

**Terminal Evaluation of the  
UN Environment and Global Environment Facility Project  
“Peru: Implementation of the National Biosafety  
Framework under the Biosafety Program”**

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## Disclaimer Text

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

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## The Evaluator

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## ABBREVIATIONS

BCH	Biosafety Clearinghouse
CONVEAGRO	National Convention of Peru's Agro
CBS	Center for Biological Safety
CPB	Cartagena Protocol on Biosafety
DGDB	General Directorate of Biological Diversity
DIGESA	General Directorate of Environmental Health
GEF	Global Environment Facility
GM	Genetically Modified
FMO	Fund Management Officer
ICGEB	International Center for Genetic Engineering and Biotechnology
INIA	National Institute of Agrarian Innovation
LMO	Living Modified Organism
NPC	National Project Coordinator
NEA	National Executing Agency
SC	Steering Committee
TM	Task Manager
UNEP	United Nations Environment Programme
BS	Biosafety
M&E	Monitoring and Evaluation
MINAM	Ministry of Environment
MTR	Mid-term Review
NCA	National Competent Authority
PRODUCE	Ministry of Production
SANIPES	National Organism of Fisheries Health
UNCBD	U.N. Conference for the Conservation of Biological Diversity
UNOPS	United Nations Office for Project Services

## PROJECT IDENTIFICATION TABLE

<b>Sub-programme:</b>	Environmental Governance	<b>Expected Accomplishment(s):</b>	Pow Accomplishment: b) The four outputs under this expected accomplishment relate to the provision of legal and technical support to Governments to develop and enforce laws and strengthen institutions to achieve internationally agreed environment.
<b>UN Environment approval date:</b>	November 2010	<b>Programme of Work Output(s):</b>	
<b>GEF project ID:</b>	3633	<b>Project type:</b>	Medium Size Project
<b>GEF Strategic Programme #:</b>	Biodiversity 3	<b>Focal Area(s):</b>	Biodiversity
<b>GEF approval date:</b>	August 2010	<b>GEF Strategic Priority/Objective:</b>	Strategic Programme 6: Building the capacity for the effective implementation of the CPB
<b>Expected start date:</b>		<b>Actual start date:</b>	June 2012
<b>Planned completion date:</b>	November 2014	<b>Actual completion date:</b>	December 2016
<b>Planned project budget at approval:</b>	US\$ 1,879,330	<b>Actual total expenditures reported as of date:</b>	(15/12/2016) US\$ 811,804.00
<b>GEF grant allocation:</b>	US\$ 811,804	<b>GEF grant expenditures reported : 7/2017</b>	US\$ 801,143.49 <sup>1</sup>
<b>Project Preparation Grant (PPG)- GEF financing:</b>	US\$ 24,560	<b>Project Preparation Grant - co-financing:</b>	US\$ 14,000
<b>Expected Medium-Size Project/Full-Size Project co-financing:</b>	US\$1,067,526	<b>Secured Medium-Size Project/Full-Size Project co-financing:</b>	US\$ 945,011.35 (30/11/2016)
<b>First disbursement:</b>	24 November 2011	<b>Date of financial closure:</b>	December 31, 2016
<b>No. of revisions:</b>	6	<b>Date of last revision:</b>	May 2016
<b>No. of Steering Committee meetings:</b>	8	<b>Date of last/next Steering Committee meeting:</b>	16 June 2014
<b>Mid-term Review/ Evaluation (planned date):</b>	January 2014	<b>Mid-term Review/ Evaluation (actual date):</b>	May 2014
<b>Terminal Evaluation (planned date):</b>	May 2017	<b>Terminal Evaluation (actual date):</b>	July 2017
<b>Coverage (Countries):</b>	Peru	<b>Coverage - Region(s):</b>	(National) Latin America

<sup>1</sup> Payments for the terminal evaluation were pending.

## EXECUTIVE SUMMARY

1. “Peru: Implementation of the National Biosafety Framework under the Biosafety Program” was implemented over a 54 month-period between June 2012 and December 2016. The project was executed by the Government of Peru’s Ministry of Environment’s (MINAM) through the General Directorate for Biological Diversity (DGDB) with the participation of government National Competent Authorities (NCAs) with biosafety mandates and representatives of civil society organizations. UNEP provided technical guidance in its capacity as designated implementing agency. The aggregate US\$ US\$ 1,879,330 budget was funded by the Global Environment Facility (GEF) that allocated a US\$ US\$ 811,804 grant for the project’s implementation and US\$ US\$ 24,560 for its design; and by MINAM and participating government institutions and universities that contributed in US\$ 945,000 in co-financing (cash and in-kind).

2. The stated project objective was to put in place a “workable and transparent National Biosafety Framework in Peru that will contribute to the conservation and sustainable use of biodiversity by enabling full implementation of the Cartagena Protocol on Biosafety and national biosafety regulations.” The stated goal was to achieve 100% response to emergency cases by National Competent Authorities (NCAs), with requests processed and solved within the legal terms. The project was implemented through three technical components with specific outcomes and outputs. These were: (i) Completing the regulatory framework on biosafety and its integration into national policies; (ii) increasing capacity to manage LMO requests, conduct assessments and take decisions, and (iii) raising public awareness, education and participation in biosafety and LMO decisions.

3. The evaluation found the project to have strategic relevance to national and global environmental objectives. Peru is one of the 17 mega-diverse countries in the world (as classed by the World Conservation Monitoring Centre) and place of origin/domestication for food and fiber crops of global importance. The project sought to implement an operational national biosafety framework that would enable the implementation of the Cartagena Protocol on Biosafety, which is associated to global goals of the U.N. Convention for the Conservation of Biodiversity (UNCBD). The project design supported GEF 4’s Focal Area Strategies and Strategic Programs for building capacity to implement the Cartagena Protocol on Biosafety (sub-program 6) and conserving biodiversity (strategic objective 3). The project was also aligned with UN Environments sub-program for Environmental Governance, a focal area of the 2010-2013 Medium Term Strategy (MTS) and its bi-annual Programs of Work (PoWs).

4. The evaluation findings and associated ratings indicate that overall project performance was moderately satisfactory (MS) with relation to the evaluation criteria, albeit at the lower end of the MS category. Most outputs were delivered by the end of the extended project period, yet the main objective and various key outcomes were only partially achieved. This was influenced by a combination of internal and external factors: Delayed start-up, three changes of national government during the project’s cycle, the national executing agency’s transition from CONAM to MINAM, the high turnover of project coordinators and UNOPS support staff, and a shift in financial accounting systems that disrupted disbursements. Various project initiatives supported the implementation of Peru’s Moratorium Law that restricts the entry and release of LMOs, with the aim of ensuring adequate national capacity. However, the Moratorium’s extension until 2021 partly undermined the viability of approving and implementing the national biosafety system within the project timeframe. The application of acquired capacities was also limited by the Moratorium, as technical training has been extended to National Competent Authorities yet “hands on experience” is very much lacking.

5. The production of outputs was **generally** satisfactory and most were delivered in full. Some outputs are of high technical quality: A new biosafety law was drafted that will be submitted to Congress for approval this year. Sector regulations were designed and two national competent authorities have created biosafety units. Proposals for integrated administrative procedures (TUPAs) were drafted and public participation mechanisms were incorporated to the proposed biosafety law. Integrated administrative procedures for the agricultural sector have been approved. Biosafety awareness and LMO risk management capabilities within NCAs have improved through study tours and training workshops that were organized in cooperation with biosafety institutions of the region. Two laboratories have been certified to detect and analyze LMOs and two others are in process. A biosafety page was created within MINAM's website. National competent authorities have a better understanding of the Biosafety Clearinghouse mechanism (BCH) and its potential for information sharing. The implementation of baseline studies of endemic varieties of corn, potato and cotton, and the mapping of their locations, is an additional project contribution that enables the incorporation of biosafety considerations into land-use planning.

6. Despite the advances, project effectiveness and impact were below expectations. The main project objective of implementing a national biosafety system was not achieved. Only two outcomes were fully met, involving increased regional cooperation for capacity building and articulation with other biosafety initiatives. There was less progress towards more strategic outcomes that needed to be reached to generate the expected scale of impact: The establishment of a functional administrative system for LMO and decision-making processes based on scientific risk assessment, review and communication were closely connected to the project objective, yet their achievement was undermined by the lack of enabling legislation and regulations. The limited attainment of project outcomes was also influenced by the approval of Moratorium Law 298111 that restricts the entry and release of LMOs until 2021. These factors have prevented the project from reaching higher-order outputs and outcomes that were designed around an operating biosafety system, and strategically important to reach the project objective and generate impact on the scale envisioned.

7. The project was part of a broader cooperation context and built on the advances of earlier GEF-UN Environment projects. The project's design and implementation strategy were well conceived and comprehensive, addressing the systemic and institutional dimensions of biosafety; the project's technical components supported the revision of existing legal/regulatory frameworks, the development of information systems and knowledge management, while allocating a significant portion of the budget to training and capacity building activities for national competent authorities.

8. However, project design was also over-ambitious in the scale of impact that was expected in relation to the allocated time and budget. Project timelines for were inadequate to achieve key outputs and outcomes that were undermined by inconsistent levels of institutional preparedness and motivation, and by a series of legal/regulatory gaps that have required the drafting and approval of new legislation. The underestimation of the time and complexity involved in revising the national regulatory framework (Component 1) or achieving a functional administrative system that is transparent, participatory and confidence building (Components 2 and 3) ultimately weakened the likelihood of their achievement.<sup>2</sup>

9. The failure to adjust the design of project outcomes and deliverables that were affected by the Moratorium's approval was an oversight in adaptive management. In retrospect, the assumption that a broad range of activities would be accomplished in four years – with three changes of government between the project's design and conclusion – was not realistic.

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<sup>2</sup> Intermediate states are described in the Reconstructed Theory of Change section.



10. Project efficiency and financial management were among the project's weaker aspects, contributing to low levels of delivery and expenditure that were significantly raised during the final year. The project administrator periodically had to devote time to reconciling financial data received from the UNOPS Atlas system into the Anubis format used by UN Environment; there were also differences in reporting formats and timelines. The project agreement with UNOPS and the project's start-up occurred before the application of Anubis or the provision of training, according to the UN Environment Task Manager. The project had to cope with a changing environment that included CONAM's transition to ministerial status as MINAM, three changes of national government and successive changes of National Project Coordinators (including an extended vacancy in the post) and UNOPS focal points. The executive decision by UNOPS to change financial systems midway through the project (from Atlas to One UNOPS) was disruptive to project delivery and generated recurrent procurement and disbursement delays. Annual budget revisions were approved to re-program unspent funds to subsequent years. The creation of the General Directorate for Biological Diversity (DGDB) and stabilization of personnel within the Project Coordination Unit, combined with the increased functionality of the new UNOPS financial system, contributed to improvements in project efficiency and delivery towards the end of the project.

11. The sustainability of project initiatives and results is largely dependent on the approval of a new biosafety law that was drafted with project support. Although more than one year has passed since the project's termination, the draft law is under internal review and requires clearance by the national competent authorities before it is submitted to Congress by the end of this year. There are uncertainties regarding the timing for the law's approval and the consideration it will receive in view of the Moratorium's extension until 2021 and other, more immediate policy priorities. Institutional sustainability is likely as Competent Authorities with biosafety responsibilities are established by existing legislation, whereas socio-political sustainability and financial sustainability in particular are contingent on the approval of new biosafety legislation and sector regulations to succeed the Moratorium. Monitoring and evaluation activities were conducted in accordance with the current guidelines for GEF-UN Environment projects.

12. A series of contributing factors influenced project performance and the level of achievement. The level of preparation and readiness were weakened by changes in the project context between the three years that passed between design, approval and inception. There were three changes of national government in the six-year period spanning the project's design, approval and implementation. CONAM underwent an internal re-organization process as it assumed ministerial functions as MINAM. Moratorium Law 29811 restricts the entry and release of LMOs for a ten-year period that expires in 2021, which undermined the viability of several outputs and outcomes. There were inconsistent levels of project ownership and commitment among national competent authorities, and initial tensions between institutions that were reinforced by the lack of prior collaboration. The Project Coordination Unit went through three changes of national project coordinator and there was low project delivery for most of the project term. Project implementation and management improved significantly with the devolution of execution responsibilities to DGDB and the gradual stabilization of the project team, as reflected in the high delivery rate that was achieved in 2016.

13. Efforts were made to build cross-sector coordination and stakeholder participation mechanisms that are essential to a functional biosafety system. The project actively encouraged stakeholder participation and coordination through the creation of an Advisory Committee with oversight functions that was expected to evolve into the National Coordination Mechanism, and the allocation of resources for stakeholder communications and participation

under the third component. MINAM will fund and implement a Communications Plan in support of the Moratorium's implementation (drafted with project support) during the next two years. The evaluation noted a gender imbalance in the representation of female trainees (20% of the total), which may reflect on the availability of technical staff within the national competent authorities.

14. The project terminated in June 2016 and further development of Peru's national biosafety framework will depend to a high degree on the timely approval of new legislation and regulations that enable the implementation of the national biosafety system. MINAM and other national competent authorities support this process with politically savvy lobbying strategy to move the proposed biosafety law through Congress and secure its timely approval. Although the project's capacity building initiatives were well received, future training on LMO risk management should include "hands on" practical training and simulations that are based on real cases. Finally, it is important that the financial accounting and reporting systems of collaborating international agencies be compatible; this issue should be appraised at the design stage as a selection criterion.

## I. INTRODUCTION

15. The project “Peru: Implementation of the National Biosafety Framework under the Biosafety Program” was executed by the Ministry of Environment (MINAM) through its General Directorate of Biological Diversity (DGDB), with funding from the Global Environment Facility and technical guidance from UNEP as the designated UN implementing agency. The UN Office for Project Services (OPS) was contracted as international executing agency for financial and administrative services. The project’s main objective was to “have a workable and transparent National Biosafety Framework in Peru that will contribute to the conservation and sustainable use of biodiversity by enabling full implementation of the Cartagena Protocol on Biosafety and national biosafety regulations.” The stated goal was to achieve 100% response to emergency cases by National Competent Authorities (NCAs), with requests processed and solved within the legal terms.

16. The project’s implementation was based on three technical components that had the following aims:

- (i) To complete the regulatory framework on biosafety and its integration into national policies for sustainable development.
- (ii) To increase capacities to handle LMO requests, carry out assessments, and take, communicate and enforce decisions, in a transparent and effective manner.
- (iii) To raise the level of public awareness, education and participation in biosafety and decision-making for LMOs.

17. “Peru: Implementation of the National Biosafety Framework under the Biosafety Program” was implemented over a 54-month period that lasted between June 2012 and December 2016, with a US\$ 811,800 grant from the Global Environment Facility (GEF). The remainder was co-financed with cash and in-kind contributions from MINAM and participating National Competent Authorities.

18. This report presents the findings of the Terminal Evaluation (TE) of the project, in line with UNEP evaluation policy and GEF guidelines for implementing agencies. The evaluation assesses project performance in terms of its relevance, effectiveness, efficiency, sustainability, stakeholder participation, national ownership, financial management and monitoring among other criteria. The evaluation will provide evidence of results to meet accountability requirements, and aims to contribute to learning, feedback and knowledge sharing between UNEP, GEF and national partners through findings/lessons that are operationally relevant for future initiatives.

## II. EVALUATION METHODS

19. The evaluation approach combined the following methods:

- A desk review of the project documentation (*June 2017*). The review encompassed the project document, Project Implementation Reviews reports, semi-annual progress reports, minutes of Steering and Technical Committee meetings, budget revisions, the Final Project Report, the GENES.PERU webpage and communications plan. The desk review provided inputs to the elaboration of the Inception Report, which represented the first deliverable of this evaluation. The evaluator constructed a Theory of Change (ToC) framework based on the causal pathways linking outputs and outcomes, which served as an analytical tool for understanding the project’s dynamics and interpreting variations in performance. The ToC analysis is included in this report under Section IV).

- A one-week country mission to interview the National Project Director and members of the project team, focal points from the National Competent Authorities (MINAM, INIA, DIGESA, PRODUCE) and non-governmental participants (ASPEC, IIAP, CONVEAGRO). The evaluator also interviewed the UN Environment Task Manager by Skype. (*July 2017*)
- The field visit was followed by the “triangulation” of findings collected from the desk review, interviews with national executing partners and the UN Task Manager, and focal points from NCAs and other targeted beneficiaries. The purpose was to systematize stakeholder perceptions of project performance from the perspective of the main focus groups, complement these with the reported “hard” data on output and budget delivery, and articulate a set of preliminary findings that were gradually developed into substantive findings, lessons and recommendations based on the evaluation criteria in the ToRs (*July-August 2016*).

The above analysis and systematization of findings provided the foundation for the elaboration of the draft Terminal Evaluation Report, which will be submitted in draft form to UN Environment and circulated among the national executing agency and other project stakeholders for review and comments. The draft report will be adjusted as necessary based on the feedback received. (*September-October 2017*)

20. The evaluation interviews were based on questions drawn from the criteria that are listed in the ToRs. However, the volume of questions and short duration of the meetings made it difficult to ask all questions to the targeted respondents, and the evaluator streamlined the interviews by clustering questions around the fundamental issues of interest.

21. The terminal evaluation was scheduled 6 months after the project’s closure, which strengthened the *ex post* perspective they are expected to apply. The time that had lapsed helped the evaluator to understand the degree to which products and results had been consolidated, providing insight into their sustainability. On the other hand, the evaluation was limited by the high turnover of participants and corresponding lack of institutional memory; there were three changes of government, three project coordinators and three UNOPS focal points over the project period. The evaluator was unable to locate the first National Project Coordinator and none of the remaining project team had been around at the design or inception stages. Some of the most important focus groups – for example, the LMO applicants who in a sense were supposed to be the project’s clients – did not participate in the project because the system was not operationalized.

Table 1

**EVALUATION FRAMEWORK MATRIX: EVALUATION QUESTIONS, RESPONDENTS, INDICATORS AND DATA SOURCES**

<b>Respondents</b>									
<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
<b>A. Strategic Relevance</b>									
1. To what extent were project objectives and implementation strategies consistent with national and sub regional environmental issues and needs?								Respondent perceptions, level of achievement of objectives and outcomes	Interviews, Project document, Final Report
2. To what extent were project objectives and implementation strategies consistent with (i) UNEP’s mandate and policies at the time; and (ii) the GEF focal area, strategic priorities and operational programme(s).								Respondent perceptions, project design	Interviews, Project document
3. To what extent were the project outcomes aligned to the Bali Strategic Plan (BSP)?								Respondent perceptions, project delivery and level of achievement	Interviews, PIRs and Final Report
4. To what extent has the project addressed gender issues and South-South cooperation?								Respondent perceptions,	Interviews, PDF reports

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
								project delivery and level of achievement	
<b>B. Achievement of Outputs</b>									
5. How successful was the project in achieving its planned outputs, considering aspects such as quantity, quality, sequencing, timeliness and usefulness? To what extent have project outputs contributed towards the expected outcomes?								Respondent perceptions, project delivery and level of achievement	Interviews, Final Report
<b>C. Effectiveness: Attainment of Objectives and Expected Outcomes</b>									
6. To what extent has the project reinforced the National Coordination Mechanism for biosafety?								Respondent perceptions, # and outcomes of cases of liability/redress	Interviews, PIRs Final Report
7. To what extent has the project strengthened the framework for managing transboundary LMOs? Are adequate technical and human resources in place? Are import/exports of LMOs being managed effectively?								Respondent perceptions, # of LMO applications at border, communication of decisions	Interviews, PIRs Final Report, NCA certifications of border officers, documentation for handling LMO import/export
8. To what extent has the project led to the approval and funding of a national biosafety training system?								Respondent perceptions, approval of Training System by Min. Education and relevant government authorities, # of trainees/graduates	Interviews, PIRs Final Report, training curricula

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
9. To what extent did the project increase NCA capacities at different levels (technical, scientific, infrastructural) and improve information flows by through the BCH?								Respondent perceptions, trends in enforcement and compliance	Interviews, PIRs and Final Report, increase in # of BCH "hits" and materials uploaded to the BCH portal
10. To what extent has PIPE public sensitization and educational strategies been contributed to increase public awareness?								Results from any surveys conducted by project on public awareness and attitudes and changes to baseline situation	Interviews, data from Min. of Education, Havana University or other implementers
<b>D. Sustainability</b>									
11. <i>Socio-political:</i> Are there any social or political factors that influence positively or negatively the sustenance of project results and impacts?								Respondent perceptions, continuity of project-supported initiatives	Interviews, Final Report
12. To what extent did CSB and UNEP-GEF engage the participation of national biosafety stakeholders in project design, implementation, monitoring and reporting?								Respondent perceptions, workshops and consultation events during design phase	Interviews, PDF reports
13. Is there sufficient government/stakeholder commitment to apply the results and recommendations of the project?								Respondent perceptions, Government decisions and resource allocations for LMO import/export control, the Training System and the national	Interviews, PIRs, Final Report

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
								coordination mechanism	
14. <i>Financial:</i> To what extent is the continuity of project results and their impact dependent on continued financial support? Will adequate financial resources be made available to ensure the continuity of programmes, plans, agreements, monitoring systems etc. that were prepared and agreed upon under the project?								Same as above.	Same as above.
15. <i>Institutional:</i> To what extent is the sustenance of the results and progress towards impact dependent on national institutional frameworks and governance? To what extent are institutional governance structures and capacities in place to sustain processes, policies, agreements and legal/regulatory aspects that were supported by the project?								Same as above	Same as above
<b>E. Efficiency</b>									
17. Did the project apply any time or cost-saving mechanisms in order to achieve results within the approved timeframe and budget?								Project expenditure and delivery trends, project work plans and budget revisions	Interviews, signed budget revisions, PIRs, Final Report
18. Did the project face any obstacles (financial, administrative, managerial) and to what extent has this affected its efficiency?								Respondent perceptions, project expenditure and delivery trends, recruitment and procurement timelines	Interviews, MTE, PIRs



<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
19. To what extent have delays in implementation and disbursements affected the delivery of the project outputs and achievement of outcomes?								Respondent perceptions, project delivery trends vs. planned timelines	Same as above.
20. To what extent did the project succeed in securing the necessary funds to implement the Training Systems?								Government financing is made available.	Interviews, PIRs, Terminal Reports,
21. Were the required progress and financial reports prepared satisfactorily and submitted on schedule?								Reports submitted on time and accepted.	PIRs, financial reports
<b>F. Factors affecting Project Performance</b>									
<i>Preparation and Readiness:</i>									
22. Were the project's objectives and components clear, practicable and feasible within its timeframe? Were stakeholders involved in the project's design?								Respondent perceptions, project performance and delivery trends, positive appraisal of project document	Interviews, project document, UNEP Quality Assurance assessment
23. To what extent were the NEA and main partners prepared to assume project execution? What factors have influenced the levels of preparation and readiness?								Same as above.	Same as above, PDF reports
24. Were adequate project execution and management arrangements in place? Were the partnership arrangements properly identified and the roles and responsibilities negotiated prior to project implementation? Were counterpart resources (funding, staff, and facilities) and								Respondent perceptions, institutional arrangements and counterpart contributions clearly	Interviews, project document, PDF reports

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
enabling legislation assured?								spelt out in project document.	
<i>Project Implementation and Management:</i>									
25. To what extent were the project implementation mechanisms outlined in the project document effective in delivering project outputs and outcomes? Were adaptations made to the approaches originally proposed								Respondent perceptions, project performance and level of achievement of outputs/outcomes.	PIRs, MTE, Final Report
26. How effective and efficient was project management by the CSB? How well has the project team adjusted project execution to changes during the project lifetime?								Same as above.	Same as above.
27. To what extent did the Steering and Technical Committees provide guidance and contribute to effective project implementation?								Respondent perceptions, implementation of SC decisions/recommendations	Interviews, minutes of SC meetings
28. To what extent did the project management and national partners respond to the guidance/recommendations provided by the Steering Committee. Technical and the UNEP Task Manager?								Respondent perceptions, implementation of SC/UNEP/MTE recommendations by PMU/CNAs	Interviews, minutes of NCC meetings, PIRs, MTE
33. Identify any operational and political / institutional problems and constraints that influenced implementation, and how the project partners tried to overcome these problems.								Respondent perceptions; identified obstacles/constraints and remedial actions taken	Interviews, minutes of SC meetings, Pairs, MTE, Final Report

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
<i>Stakeholder Participation and Public Awareness</i>									
29. What approaches were used to identify and engage stakeholders in project design and implementation?								Respondent perceptions, evidence of workshops or other consultation mechanisms	Interviews, PDF reports, PIRs, MTE
30. To what extent have project partners and stakeholders collaborated/interacted effectively during project design and implementation?								Respondent perceptions, documented interactions	Same as above.
31. Did the project promote mechanisms for stakeholder participation in decision-making?								Respondent perceptions, evidence of stakeholder participation in planning and decision-making	Same as above.
<i>Country Ownership and Driven-ess</i>									
32. To what degree has CSB assumed responsibility for the project and provided adequate support to project execution, including the cooperation received from the various public institutions involved and timeliness of counterpart funding?								Respondent Perceptions, performance of CONAP and project team in implementation, timeliness of project delivery	Interviews, PIRs, MTE, Final Report
33. To what extent have the NCAs and other key partners facilitated project performance?								Respondent perceptions	Same as above
<i>Financial Planning &amp; Management</i>									
34. Were sufficient financial resources made								Respondent	PIRs, budget revisions,

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
available and disbursed in a timely manner to the project and its partners?								perceptions, timeliness of disbursements, budget revisions	financial reports
35. Were administrative processes such as staff recruitment, procurement of goods and services (including consultants), and preparation/ negotiation of cooperation agreements conducted efficiently and in a timely manner?								Same as above.	Same as above
36. Were co-financing commitments met as programmed and made available in a timely manner?								Same as above.	Same as above.
37. Were additional resources – financial, in-kind – leveraged by the project, beyond those that were already committed prior to the project’s approval?								Budget revisions, increased allocations to existing/new budget lines through co-financing	Same as above.
38. Identify irregularities (if any) in procurement, use of financial resources and human resource management, and the measures taken by CSB or UNEP to correct/prevent such irregularities.								Documented irregularities, interrupted procurement/disbursement processes	Interviews, PIRs, Final Report, MTE, audit reports
<i>UNEP supervision and backstopping:</i>									
39. Assess the quality and efficiency of UNEP’s supervision plans, outcome monitoring, PIR reporting and financial/administrative services								Respondent perceptions, timeliness and acceptance of PIR and financial reports; timeliness of disbursements and	Interviews, PIRs, Final Report

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
								administrative support services by UNEP	
<i>Monitoring and evaluation&gt;</i>									
40. Did the project's design include a viable M&E plan that is based on outcomes and includes indicators?								Monitoring Plan is included in the project document.	Project document
41. Did the project's design include a monitoring budget?								Project document includes monitoring budget line.	Project document.
42. Have monitoring findings influenced adaptive management and contributed towards resolving implementation problems?								Respondent perceptions, evidence of technical/management decisions based on monitoring findings	Interviews, monitoring reports
43. Are there specific indicators for each of the project objectives? Are the indicators measurable, attainable (realistic) and relevant to the objectives? Are the indicators time-bound?								Indicators are included in Results Framework for each objective.	Project document.
44. Have the responsibilities for M&E activities been clearly defined? Were the data sources and data collection instruments appropriate? Was the frequency of various monitoring activities specified and adequate? In how far were project users involved in monitoring?								Designated parties conduct monitoring activities periodically with inputs from project participants. The monitoring approach is considered methodologically	Interviews, monitoring reports.

<b>EVALUATION QUESTIONS</b>	<b>Project Team</b>	<b>CSB</b>	<b>Steering Committee</b>	<b>Technical Committee</b>	<b>LMO import/export</b>	<b>UNEP Task Manager</b>	<b>UN Environment</b>	<b>Indicators</b>	<b>Data Source</b>
								appropriate by the evaluator and most respondents.	

### III. THE PROJECT

#### A Context

22. Peru is one of 17 mega-diverse countries in the world according to the World Conservation Monitoring Centre, and place of origin and domestication for food crops that include potato (*Solanum* sp), tomato (*Solanum lycopersicum*), maize (*Zea mays*), sweet potato (*Ipomoea batata*), hot peppers (genus *Capsicum*) and colored cotton (*Gossypium barbadense*) among others.

23. The project was framed in the National Environmental Policy's (PNA) Policy Focus No. 1 "Conservation and Sustainable Use of Natural Resources and Biodiversity" which aims to "build and develop a regulatory system based on the application of transparent and scientific risk analysis, capable of ensuring safety and traceability of goods and/or services obtained through the application of modern biotechnology, responding to consumer demands, to our status as mega-diverse country and to the context of ongoing technological developments".<sup>3</sup>

24. The project built on previous steps taken by the Peruvian government to establish comprehensive and effective national biosafety system, a process supported by earlier GEF-UN Environment projects. Peru had played an active role in ongoing discussions under the Cartagena Protocol and one of the Latin America's most visible participants as Party to the Protocol in recent COPs. Over the years Peru had demonstrated commitment towards a transparent and functional biosafety system as reflected in the designation of National Competent Authorities under Law 27104 for the Prevention of Risks derived from Biotechnology. National authorities such as the National Environment Commission (subsequently upgraded to ministry status as MINAM) and the National Institute for Agrarian Innovation (INIA) have developed institutional capacities to protect biodiversity from the risk of genetic contamination and unregulated biotechnology. The approval of Free Trade Agreements (FTAs) with the North America and the EU, and the potential risks of releasing genetically-modified seed into the environment, led to the adoption of an Operating Biosafety Framework and approval of aforementioned Laws 27104. Moratorium Law 29811 was approved in 2011 to restrict the entry or release of LMOs until 2021, with the aim of improving national preparedness. There has been growing awareness and debate around across the country as reflected in the involvement of consumer and sector associations (ASPEC, CONVEAGRO) and the approval of local ordinances that designate 27 (more than half) of Peru's geo-administrative regions as transgenic free zones.

25. Despite advances over the years, there were continuing capacity needs and legal-regulatory gaps that required continued assistance from GEF and UN Environment. Project justification and design were based on a comprehensive analysis of threats and barriers identified at the initial design stage. The existing legislation under Law 27104 was found to have gaps and inconsistencies that prevented the implementation of a national biosafety framework in compliance with the Cartagena Protocol. Likewise, internal sector regulations that need to be approved in order to formalize NCA biosafety functions were lacking (with exception of INIA). The basic elements of a functional national biosafety framework - the approval and exercise of institutional responsibilities, the application of common standards to LMO analysis and decision-making, sanctions for non-compliance or illegal activities - were not in place. There were no mechanisms in place to monitor the circulation of transgenic corn, soybean or vegetables and prevent the use of GM grain as seed.

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<sup>3</sup> Approved through Supreme Decree No. 012-2009- MINAM, May 22, 2009

## **B Objectives and Components**

26. The project's main objective was to **"have a workable and transparent National Biosafety Framework in Peru that will contribute to the conservation and sustainable use of biodiversity by enabling full implementation of the Cartagena Protocol on Biosafety and national biosafety regulations."** The stated goal was to achieve 100% response to emergency cases by National Competent Authorities (NCAs), with requests processed and solved within the legal terms.

27. As noted earlier, the project was composed of three technical components with their respective outcomes and outputs. These were the following:

28. *Component 1:* Completing the regulatory framework on biosafety and its integration into national policies for sustainable development.

*Expected Outcomes:*

- New and revised biosafety regulations respond to national priorities and allow for full CPB compliance.
- Greater involvement in regional and sub-regional cooperation is achieved for joint capacity building, searching for synergies and generating bi/multilateral agreements.

29. *Component 2:* Increasing the capacity to handle requests, carry out assessments, and take, communicate and enforce decisions, in a transparent and effective manner for the biosafety of LMOs.

*Expected Outcomes:*

- A fully functional administrative system for handling LMO requests is in place and maintained over time.
- Biosafety decision-making is based on scientific risk assessments, and includes review and communication of decisions.
- Institutional mandates and capacity for risk management, including enforcement of decisions (compliance) and LMO monitoring, are strengthened.
- Confidence is built between applicants, stakeholders and NCAs through transparency of procedures and criteria.
- Integration is achieved with other biosafety capacity-building initiatives.

30. *Component 3:* Raising the level of public awareness, education and participation in biosafety and decision-making for LMOs.

*Expected Outcomes:*

- Sharing of biosafety information amongst NCAs, between sectors, between countries, and for public access, is strengthened.
- Public participation in biosafety and LMO decision-making is heightened and institutionalized.
- General awareness is raised regarding LMO and their use, particularly in the agricultural and food producing sectors.

## **C Stakeholders**

31. The main project stakeholders were the designated National Competent Authorities that have been assigned biosafety mandates and would manage LMO risk management and decision-making processes. Given their role as NCAs they were the main target group and had the most to benefit from the project. They included the Ministry of Environment (MINAM) and General Directorate for Biological Diversity (DGDB) in particular, the General Directorate for Environmental Health (DIGESA), the National Institute for Agrarian Innovation (INIA) and SANIPES (National



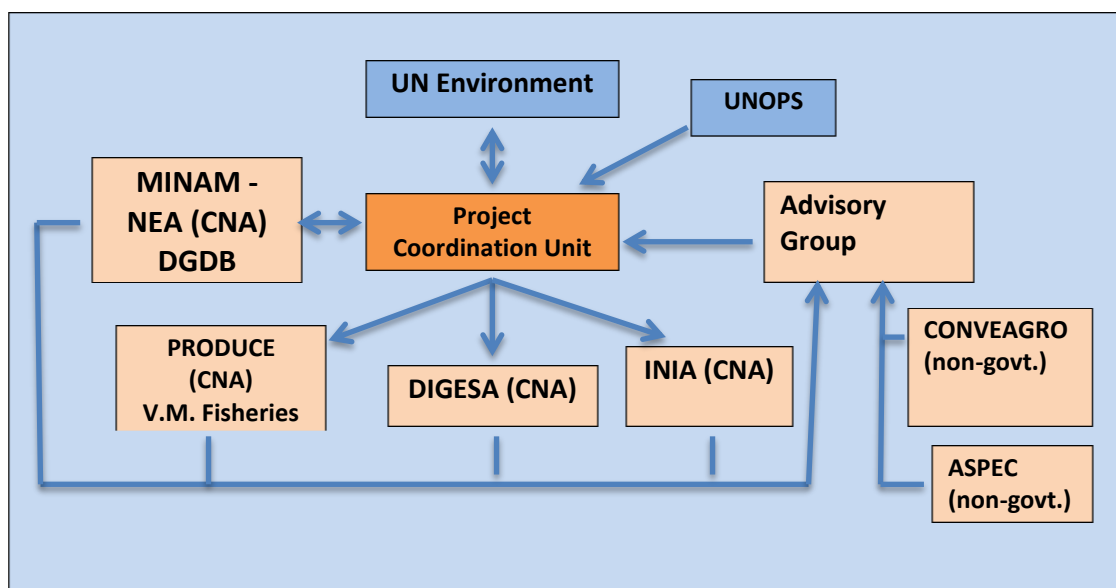
Fisheries Health) under the Ministry of Production (PRODUCE). The indirect stakeholders included the Technical Group on Biosafety, the Inter-sectoral Advisory Committee (CMA), agricultural producers, importers of grain and seed, customs and border control officials, universities and policymakers.

#### D Project Implementation Structure and Partners

32. The Ministry of Environment (MINAM) executed the project through its General Directorate of Biological Diversity (DGDB), with technical guidance from UN Environment as the designated UN implementing agency. The UN Office for Project Services (OPS) was contracted as international executing agency for financial and administrative services.

33. A Project Coordination Unit was created within DGDB that was comprised by:
- The National Project Director (appointed by the MINAM), whose function is to liaise between the MINAM and the Project, ensuring support from the institution.
  - The National Project Coordinator (NPC), responsible for the project’s operation and its technical and administrative progress. The NPC reported to the National Project Director.
  - A technical assistant, responsible for assisting the Project Coordinator in the technical aspects of the project and drafting required documents.
  - An administrative/financial assistant whose role was to implement administrative procedures and coordinate budget disbursements with UNOPS.

Figure 1: Project Institutional Arrangements



34. A project Advisory Group was formed with the oversight functions of a project steering committee. It was constituted by representatives of MINAM, the Vice-Ministry of Fishing, INIA and DIGESA in their capacity as NCAs. The Advisory Group reviewed project progress and advise on project implementation, provided feedback and coordinated actions involving its members.

This group was expected to evolve into the Inter-sectorial Working Group of NCAs in Biosafety that would implement the biosafety system. The UNEP Task Manager was also member to the Advisory Group, and assisted the project with monitoring and backstopping support on budget management and reporting. The Advisory Group met periodically, although not on a quarterly basis as initially foreseen, and reported to the National Commission on Biodiversity (CONADIB) and to the Technical Group on Biosafety (GTB).

#### **E Changes in Design during Implementation**

35. There were no changes to the project’s design during implementation. Six budget revisions were approved during the project period to re-program unspent balances into the following year, and transfer funds between budget lines. This did not entail changes to the project’s design or to its deliverables, although the Moratorium Law that was approved in 2011 altered the project context and warranted adjustments to the affected outputs and outcomes.

#### **F Project Finances**

36. The approved project budget totaled US\$1,879,330 that combined a US\$ 811,804 cash grant from GEF and US\$ 1,067,526 in government co-financing (cash and in-kind). By the end of the project US\$ 801,143.49 (98.7% of the total GEF budget) had been disbursed with a small unspent balance earmarked for the Terminal Evaluation. Government co-financing contribution had been met and the in-kind portion slightly exceeded as a result of the project’s extension.

37. The following figure breaks down the project budget according to source and type of funding.

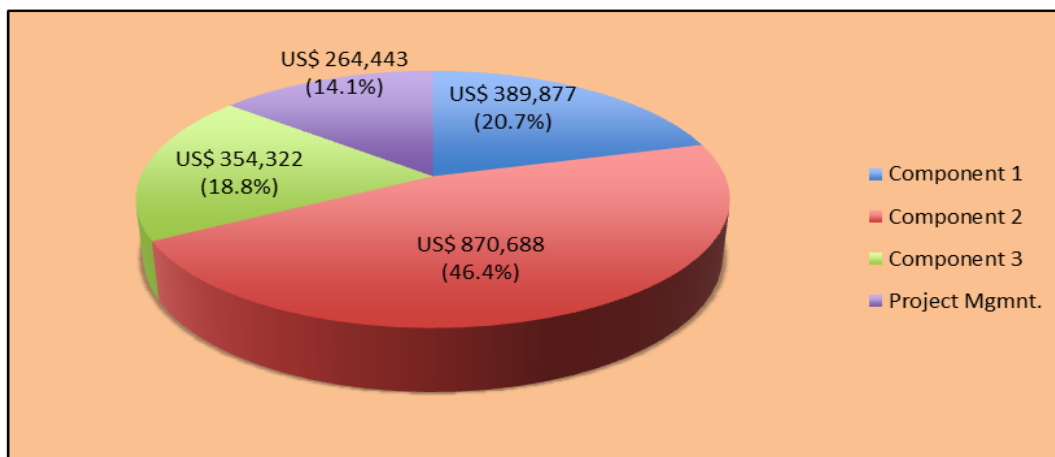
**Table 2: Distribution of Project Finances (Cash and In-Kind)**

<b>Source</b>	<b>Amount (US\$)</b>	<b>% of Total Finances</b>
<b>GEF Grant (Cash):</b>	811,804	43 %
<b>Co-financing:</b>	1,067,526	57 %
<i>Cash</i>		
MINAM	136,908	13%
PRODUCE	26,664	2.5%
<i>In-kind</i>		
INIA	149,322	14%
MINAM	160,568	15%
PRODUCE	263,396	24.5%
DIGESA	176,772	16.5%
IIAP	55,265	5%
SENASA	58,970	5.5%
IMARPE	39,661	4%
<b>Co-financing Sub-total:</b>	1,067,526	
<b>PROJECT TOTAL:</b>	<b>1,879,330</b>	<b>100%</b>

38. In terms of implementation strategy, almost half of the project budget was allocated to the second technical component that sought to increase the capacity to handle requests, carry out assessments, and take, communicate and enforce decisions. This was followed by relatively balanced allocation of funds between the first component for the completion of the biosafety regulatory framework and its integration into national policies (20.7%) and the third that aimed to

raise public awareness and participation in LMO assessments and decision-making (18.8%). Finally, project management costs absorbed 14% of the budget.

**Figure 2: Distribution of Funds by Project Component**



#### IV. RECONSTRUCTED THEORY OF CHANGE

39. As applied to evaluations, “Theory of Change” (TOC) analyzes the sequence of desired changes (called “causal” or “impact pathways”) to which the project is expected to contribute. It shows the causal linkages between changes at different results levels – i.e. outputs, outcomes, intermediate states, objectives, impact - and identifies the factors that influence those changes. The reconstruction of causal pathways helps to identify the linkages that connect outputs to outcomes, and the “intermediate states” that must be reached in order to have the intended impact. The TOC also identifies “impact drivers” that move implementation forward and “external assumptions” in project design that affect performance yet are outside the project’s influence. TOC offers a useful analytical tool both for planning project implementation and for evaluating the implementation approach utilized.

40. The project objective was to **“strengthen the NBF and implement it in a functional and transparent fashion, for the successful implementation of the Cartagena Protocol”**. The goal was to ensure that “100% of emergency cases are answered by the National Competent Authorities (NCAs), and requests are processed and solved within the legal terms”.<sup>4</sup> Although a formal impact statement was not included in the project document, the indicators of the objective include the 100% NCA responsiveness to “emergencies”, and the existence of government and civil society frameworks that address the risks of modern technology. Reaching the project objective required a strategic sequence of outputs and outcomes that needed top be delivered in order to maximize impact.

41. The project’s logical framework was analyzed according to causal pathways that indicated the extent to which complementary outputs and outcomes were connected sequentially; in many cases one output or outcome provided inputs for the achievement of another. These pathways are illustrated in Figure 5 below. The pathways show high levels of connectedness between outputs and their respective outcomes, and between outcomes linked to different components. The high degree of articulation was indicative of good design, but also

<sup>4</sup> Project document, pg. 2

underscored the importance of considering the inter-dependency of outputs and outcomes when planning implementation.

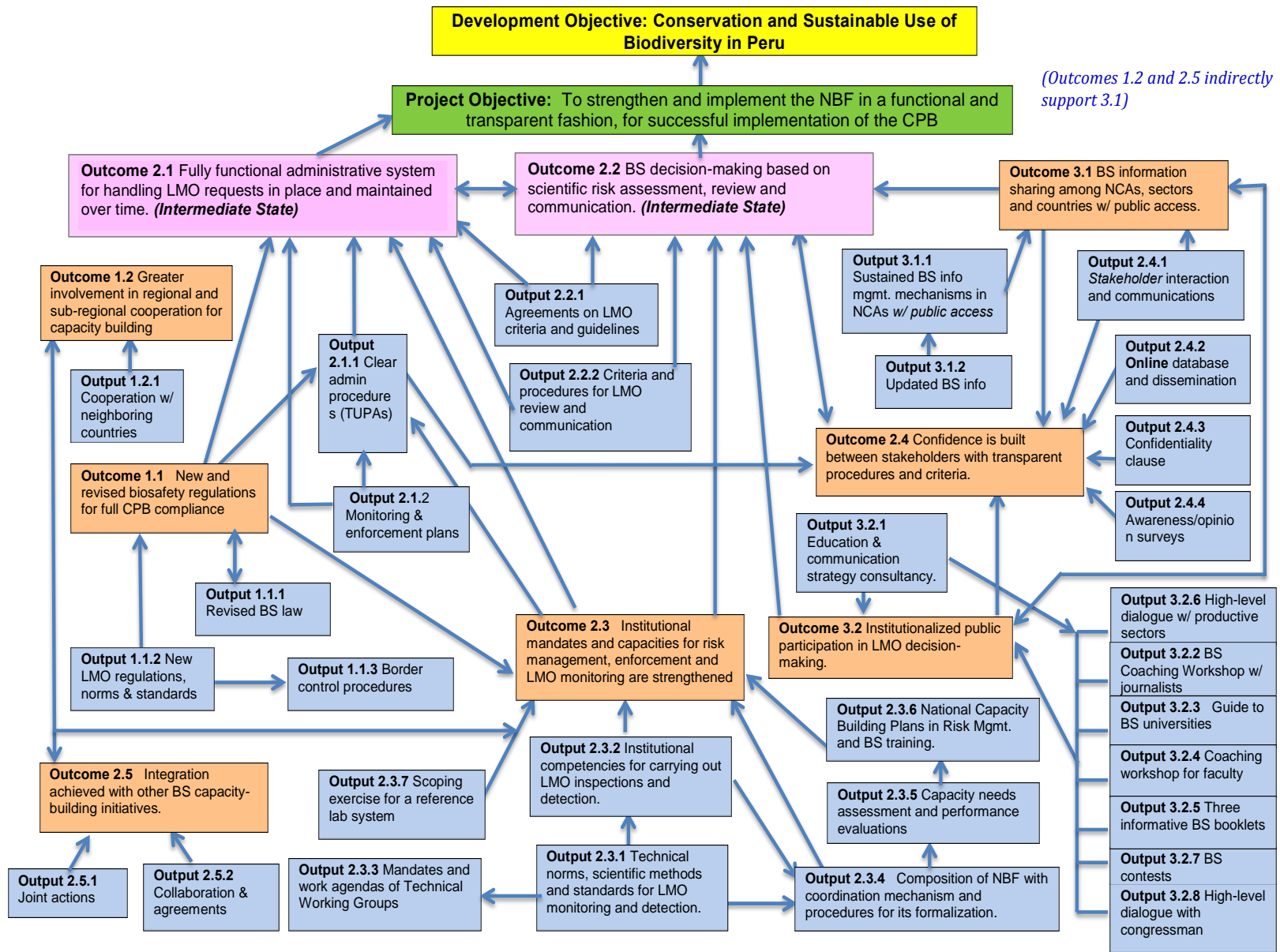
42. The project objective was to be reached through two higher-order outcomes that were the “intermediate states” that built on the achievement of the other outcomes. These intermediate states were (i) a fully functional administrative system for handling LMO requests that is in place and maintained over time (outcome 2.1) and (ii) effective, informed biosafety decision-making (outcome 2.2). Outcome 2.2 stood out in particular because five outcomes fed into it. Both were associated with the second project component of raising national capacities to handle LMO requests as well as communicate and enforce LMO decisions. Both outcomes were enabled by improvements to the biosafety regulatory/legal framework under the first component, and increased public awareness and participation in biosafety decision-making with the third component. While all outcomes led to the project objective, a functional biosafety system with effective, informed decision-making was the fundamental requisite for attaining the project objective and goal.

43. Several causal pathways emerged from the analysis: One pathway started with the revision of biosafety regulations for full CPB compliance (outcome 1.1) which enabled the formalization of NCA mandates and capacity-building (outcome 2.3), both of which directly feed into the intermediate state of a fully functional administrative system for LMO requests (outcome 2.1). The approval of revised regulations and legislation were therefore essential for this pathway to advance. This chain was reflected in the following sequences:

- *Pathway 1:* Outputs 1.1.1 (new biosafety law) > 1.1.2 (new LMO regulations) and 1.1.3 (border control procedures) > outcome 1.1 (new and revised BS regulations) > 2.1 (fully functional system) and 2.2 (effective decision making) > project objective.
- *Pathway 2:* Outcomes 1.1 (new and revised biosafety regulations) and 2.3 (institutional mandates and capacities) > outputs 2.1.1 (clear administrative procedures) and 2.1.2 (monitoring and enforcement plans) > outcome 2.1 (fully functional system) and 2.2 (effective decision-making) > project objective.
- The strengthening of institutional mandates and capacities (outcome 2.3) is a strategic outcome that feeds into several outcomes and outputs, and must be achieved early in the project’s implementation in order to enable the intermediate stages (outcomes 2.1 and 2.2).

44. There were other pathways as well that had a bearing on the scheduling of output and outcome delivery. The pathway for achieving a state of confidence between stakeholders (outcome 2.4) was complex and depended on the institutionalizing of public participation (outcome 3.2), information-sharing (outcome 3.1) and informed LMO decision-making (outcome

**Figure 3: Theory of Change: Critical Pathways linking Outputs, Outcomes and Intermediate States to the Project Objective**



2.1). As a result, confidence building was likely to require a longer-term process with continuity beyond the project term. Biosafety information sharing (outcome 3.1) on the scale that was envisioned depends on the formalizing of NCA mandates, institutionalized public participation (outcome 3.2) and cooperation agreements with other programs or countries (outcome 1.2, 2.5), in addition to having functional information management systems that enable data sharing (second and third components).

45. The analysis suggests that different clusters of outputs and outcomes should have been implemented sequentially to maximize effect and create the enabling conditions for achieving the project objective. This would have been difficult to realize within the approved four-year period. One of the project lessons suggests that the simultaneous, *ad hoc* implementation of project outputs is good for delivery and expenditure, yet may lower technical quality or override the capacity of partner institutions. The cumulative effect of a sequenced implementation approach that follows causal pathways is more likely to raise overall impact. The down side is that an incremental process of this type may be likely to involve more time than is permitted for a medium-size project.

46. Project design was also influenced by “drivers” that moved the implementation process forward, and “external assumptions” outside the project’s control. The following were identified:

47. *Drivers:*

- The upgrading of the national executing agency (CONAM) from Commission to Ministry with an expanded mandate and attributions.
- The approval of Moratorium Law 29811 that restricts the entry of genetically modified organisms (GMOs) for a ten-year period, in order to facilitate the development and implementation of a comprehensive national biosafety framework.
- The support of key sectors/stakeholders (farmers organizations, the tourism sector) for biosafety measures applied to agriculture, given the growing importance of non-transgenic crops for export markets and Peru’s gastronomic tourism industry. The representation of these stakeholders in the project Steering Committee was expected to enhance the project’s implementation.

48. *Assumptions:*

- There is political will and commitment to approve the legal and regulatory revisions that are necessary to formalize NCA mandates and establish the National Coordination Mechanism.
- Participating government institutions that are not NCAs are motivated to participate fully in the project, in spite of the existing Moratorium.
- The country is capable of coordinating the institutional activities of the NCAs in managing the national biosafety framework, so as to achieve a significant improvement over the pre-project situation.<sup>5</sup>
- There is low staff turnover within the national executing agency, project team and NCAs.

## **V. EVALUATION FINDINGS**

### **A Strategic Relevance (Evaluation Rating: Satisfactory)**

49. The project’s design supported national and global objectives for biosafety and

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<sup>5</sup> This assumption is highlighted in the project document.

biodiversity conservation, as described in the project document under sections 2.2 “Global Significance” and 3.1 “Project Rationale”. Peru had ratified the Cartagena Protocol on Biosafety in 1993, and prioritized a regulatory system for risk analysis of genetically modified organisms within its National Environmental Policy (PNA) objective under Supreme Decree No. 012-2009-MINAM (2009). Competent National Authorities were designated under Law 27104 for the Prevention of Risks derived from Biotechnology.

50. The project sought to establish an operating national biosafety framework that would enable the Cartagena Protocol’s implementation. This endeavor supported global environmental objectives associated with the broader U.N. Convention for the Conservation of Biodiversity (UNCBD). Shortly after the project’s approval in 2011, Congress approved Law 29811 that places a ten-year moratorium on the entry or release of living modified organisms (LMOs) in order to strengthen national preparedness. The project was relevant to the Moratorium, which was approved precisely to enable the development of comprehensive biosafety legislation and regulations, raising national capacities and improving levels of compliance with the Cartagena Protocol. In terms of timing, however, the project’s relevance was weakened by its early termination in relation to the Moratorium that extends until 2021; capacity improvements and other advances that were made during the project may decline over time if they aren’t put into practice.

51. Relevance to national and global biodiversity priorities was high. Peru is one of the 17 mega-diverse countries in the world (as classed by the World Conservation Monitoring Centre) and place of origin/domestication for food and fiber crops of global importance. An operational national biosafety framework is essential to protect Peru’s biodiversity, manage potential risks associated with the unintended release of LMOs, and effectively manage Free Trade Agreements with North America and the European Union.

52. The project complemented the Strategy for Financing Biosafety of Sub Program-6 (Building Capacity for the Implementation of the Cartagena Protocol on Biosafety) and Biodiversity Strategic Objective 3 (SO3) of GEF 4’s Focal Area Strategies and Strategic Program. Its design was aligned with the objectives of UN Environments sub-program for Environmental Governance, a focal area of the 2010-2013 Medium Term Strategy (MTS), and its bi-annual Programs of Work (PoWs).

53. South-south cooperation was an important aspect of project design. The capacity building approach and one-third of the project’s outcomes were built on cooperation from other countries of the region for study tours and training. The 11 training events implemented under the second component involved technical experts from Cuba, Mexico and Colombia. A joint project between Peru’s Fisheries Sanitation authority and Cuba’s Center for Biological Safety (CSB) was designed with project support, approved and expected to start this year.

54. The project was not particularly relevant to gender due to its technical-scientific focus. Gender considerations did not seem to be present in the selection of training participants – only 7 of 29 trainees were female –which also may be reflective of gender imbalances in the pool of technical staff. The project indirectly supported the Bali Strategic Plan for Technology Transfer and Capacity Building by providing training opportunities for the transfer of biosafety skills, and improving national laboratory infrastructure (and accreditation) for LMO detection.

**B. Quality of Project Design (Evaluation Rating: Moderately Satisfactory)**

55. “Implementation of the National Biosafety Framework under the Biosafety Program” was designed to operationalize biosafety management in Peru, in compliance with guidelines established by the Cartagena Protocol on Biosafety (CPB). The project was part of a broader

cooperation context and built on the advances of earlier GEF-UN Environment projects.

56. The project was well conceived. The design and implementation strategy was comprehensive and addressed the systemic and institutional dimensions of biosafety. At the systems level, the project aimed to consolidate an enabling legal-regulatory framework (outcome 1.1), establish functional mechanisms for LMO identification, decisions and communication (outcome 2.2), integrated information systems (outcome 3.1), raise public awareness and participation (3.2, 3.3) and build stakeholder confidence through transparent procedures (outcome 2.4). These initiatives were reinforced at an institutional level, by formalizing biosafety mandates and sector regulations for National Competent Authorities, and organizing training events to build institutional capacities (outcomes 2.3, 2.5). Institutional synergies were to be promoted through information sharing, greater use of the Biosafety Clearinghouse (BCH), and a National Coordination Mechanism with an overarching, cross-sector biosafety mandate.

57. If overall project design was straightforward and well-articulated, it was also over-ambitious in the scale of expected outcomes and impact in relation to the project's allocated time and budget. Time constraints were a determining factor in the project's impact. The inadequacy of project timelines for reaching major outputs and outcomes was underscored by mixed levels of institutional preparation and motivation, and by the legal and regulatory gaps that required the drafting and approval of new legislation. Key deliverables such as the revision of existing legislation and approval of sector regulations have advanced slowly and a proposed new law was being reviewed internally six months after the project's completion. The underestimation of the time and complexity involved in harmonizing the national regulatory framework (Component 1) or achieving a functional administrative system that was transparent, participatory and confidence building (Components 2 and 3) ultimately weakened the likelihood of their achievement.<sup>6</sup> In retrospect, the assumption that a broad range of activities would be accomplished in four years – with three changes of government between the project's design and conclusion – was not realistic. The project was eventually extended by six months to compensate for its late start, but this was insufficient to deliver results that ultimately depended on decisions outside the project's or MINAM's control.

58. The project foresaw the achievement of ten outcomes, a scale that in retrospect was over dimensioned for a medium-size, four-year project. Some of these outcomes were based on ambitious targets – for example, achieving 100% response and decisions to LMO applications by the project's mid-term (objective 2), approving and applying new biosafety regulations within each national authority (outcome 1.1), or systematizing public participation in LMO decision-making. Outcomes and outputs were linked by "causal pathways"<sup>7</sup> that connected the different project components. While commendable in terms of design, this arrangement called for a sequenced delivery of outputs and outcomes (based on the pathways) to maximize their achievement. For example, the approval of legislative and regulatory revisions under the first component was essential to move forward with the other two components. Several outputs and outcomes of the first and second components provided inputs to outcomes under the third component. Unfortunately, an incremental implementation process based on output-outcome linkages would have required more time than is available for these projects.

59. The project was designed in 2009, approved in 2011 and activated in 2012. There were understandable changes during this period that called for adjustments to the project's design and implementation arrangements. In particular, the approval of Moratorium Law 29811 restricting the entry and release of LMOs shifted the project context and baseline situation considerably, with significant repercussions on outputs and outcomes that were designed around an

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<sup>6</sup> Intermediate states are described in the Reconstructed Theory of Change section.

<sup>7</sup> Same as above.



operational biosafety framework. Although it was clear at an early stage that some of the planned outputs and outcomes were less feasible under the Moratorium, there were no revisions to project design or to the deliverables. The project team was understandably not in a position to downscale objectives or results that were the basis for the project's approval. However, it is surprising that adjustments were not proposed or discussed at the inception stage - or alternatively, the implementation period re-scheduled to improve timing in relation to the Moratorium and raise the impact potential.

60. The project's allocated timeframe was inadequate for delivering expected outcomes and impacts, as described in paragraphs 57-58. Due to this, the project's implementation was extended by one year without raising the budget. Resource allocations were adequate, except for the designation of the National Project Coordinator as a half-time position, which failed to recognize the levels of engagement and impact that were expected. The subsequent decision to upgrade the NPC to full-time status was necessary yet caused a budgetary shortfall that left the post vacant for the project's last six months. The under-budgeting of the project coordinator post has been a recurring constraint for GEF-UNEP biosafety projects in the region (i.e. Costa Rica, Guatemala) that lowered performance, particularly when cash co-financing was not available from the national executing agency.

### **C. Nature of the External Context**

61. Project performance was affected by externalities that were unrelated to its design and outside of its control:

- **Changes of government and staff turnover** There were three national governments in the seven-year period spanning the project's design to its conclusion. Successive changes of authorities and the lack of staff permanence have limited the impact of capacity building initiatives - for example, over half of the trained technicians of PRODUCE have since left - and made it difficult to sustain momentum. Several respondents expressed the opinion that the current government administration does not have a strong policy position on biosafety, and the approval of new legislation will largely depend on the support of the main opposition party that presently holds a majority in Congress.
- **Moratorium Law 29811** Congress approved a ten-year moratorium on the entry and release of LMOs in 2011. This has been a mixed blessing for the project. On one hand, the Moratorium recognized the lack of biosafety preparedness and provides the space to develop an integrated national biosafety framework with stronger institutional capabilities. On the other hand, the Moratorium's extension until 2021 undermined the viability of approving and implementing a national biosafety system within the project's timeframe, and limited opportunities to apply technical capacities that were acquired through the project. In this respect, the Moratorium indirectly influenced progress towards at least half of the project's expected outcomes (2.1, 2.2, 2.4, 3.1-2).
- **Continuing institutional susceptibilities:** Although one of the project outcomes envisioned confidence building between biosafety stakeholders with transparent procedures and decisions, there continue to be tensions between NCAs and other key partners. There are expected discrepancies between the entrepreneurial sectors that import genetically modified grains and processed foods (not covered by the Moratorium) and conservationists, farmer associations and consumer networks that oppose transgenic products on principle. There are also continuing distances between NCAs that are influenced by institutional issues unrelated to the project. A common vision is still lacking although there is initial agreement on the new law. Some NCA focal and CMA members support the controlled release of LMOs while others would prefer to have the Moratorium extended indefinitely. The elevation

of the National Environment Commission (CONAM) to ministerial status (MINAM, and its role as lead National Competent Authority for biosafety were viewed with reluctance by national authorities that perceived an environmentally-biased outlook, particularly during the first years of implementation. This affected institutional coordination with some NCAs.

## **D Effectiveness (Evaluation Rating: Moderately Unsatisfactory)**

### **D.1 Achievement of Outputs (Evaluation Rating: Satisfactory)**

62. Output delivery was low for most of the project's duration yet picked up considerably during the final year. By the end of the project, output delivery had reached satisfactory levels with 24 of 32 outputs (75 %) reported as fully completed by the Final Project Report. Project outputs have contributed to (i) the creation of biosafety divisions within two National Competent Authorities that are funded by institutional budgets, (ii) the establishment of a national LMO control and vigilance system that is functional and covers 24 of Peru's political-administrative regions, (iii) the approval of integrated administrative procedures for LMO risk analysis designed for the agricultural sector, and (iv) the accreditation of two laboratories for LMO detection (two more are in process of accreditation). New and more integrated biosafety legislation was drafted with the participation of NCAs and is in the final stages of clearance, before going to the National Congress for approval. These outputs have improved conditions for implementing a national biosafety system in Peru, and in doing so have also assisted the implementation of the Moratorium Law that seeks to establish an integrated policy/operational framework. However, the evaluator notes that some outputs that were considered fully completed in project reports do not meet the corresponding indicators or targets. They include agreements on biosafety complaints and illegal LMO cases (output 3.2.3) and "high level dialogues" between congress, farmers and producers (output 3.3.4). Likewise, a national biosafety system with national competent authorities led by MINAM (output 2.3.4) is recognized under law 27104 yet is not operational. Nor has the capacity to conduct LMO risk assessments (output 2.3.5) been developed outside of short training courses and study tours that generally lacked practical "hands on" exposure; capacity improvements are not being applied in most cases and within some NCAs (i.e. PRODUCE) a high proportion of trained staff have since been transferred or changed jobs. These considerations would slightly lower the number of fully completed outputs without having a significant effect on overall delivery.

63. This assessment of output achievement is consistent with the findings of the Theory of Change analysis, which examines the "causal" or "impact pathways" that link outputs to outcomes. The first component – "to complete the regulatory framework on biosafety and its integration into national policies" – was critically important because it created enabling conditions for the other project components. However, key outputs of this component - 1.1.1 "revised biosafety law" and 1.1.2 "new sectorial regulations – were ultimately not achieved. This was influenced by gaps in existing Law 27104 for the Prevention of Risks derived from Biotechnology, which has led to an extended process of drafting and approving new legislation that is in progress. Another contributing factor was the approval of a ten-year Moratorium Law that prohibits the importation and release of LMOs until 2021.

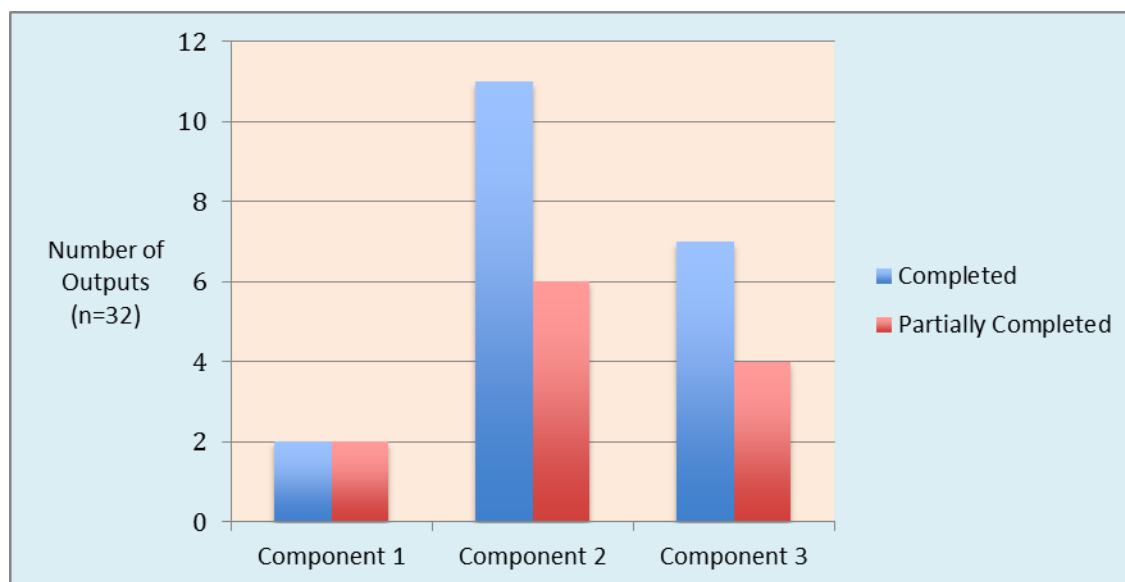
64. The low achievement of these outputs under the first component also affected progress of the second component, which sought to "increase capacities to handle requests, carry out assessments and take, communicate and enforce decisions in a transparent and effective manner for the biosafety of LMOs."<sup>8</sup> This limited the full adoption of integrated administrative procedures for handling LMO applications (output 2.1.1) - although a TUPA for the agricultural sector (the main source of LMOs) was recently approved – as well as agreed guidelines and

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<sup>8</sup> *Reporte Final IMNB Perú/Final Report*, pg. 10

protocols for LMO risk management (output 2.2.2) and interactions with LMO applicants and decision-makers (output 2.4.1). Likewise, the project was unable to implement biosafety practices on which to assess stakeholder views regarding procedures and requirements (output 2.4.4).

**Figure 4: Achievement of Outputs by Project Component**



Source: Analysis based on data from *Reporte Final IMNB Perú* (Final Report) and project indicators.

65. Although other outputs were delivered as planned, several did not progress beyond proposals or consultancy reports and is therefore unlikely to have impact unless the proposed biosafety law is approved (which is not expected to happen this year). With the exception of the National Institute for Agricultural Innovation (INIA), National Competent Authorities have yet to internally revise sector regulations to formalize biosafety mandates. Capacity building outputs (2.3.5, 1.2.1) weren't directly affected by the slow progress of the first component and were successfully implemented (both nationally and in selected countries) through courses that were led by experienced practitioners.

66. The outputs of the third component focused on information sharing between national authorities, raising public awareness and promoting public participation in biosafety risk management. The delivery of several outputs was clearly restricted by the lack of internal biosafety regulations for most National Competent Authorities (Component 1), and in particular the lack of a functioning biosafety system on which to build information-sharing practices, build confidence between stakeholders and promote public participation.

67. The following table lists the project's outputs and their level of achievement:

**Table 3: Achievement of Individual Outputs**

Output	Final Achievement Level	Comments
1.1.1 Revised biosafety law	Partially Completed	A new biosafety law was drafted and is being internally reviewed by MINAM. The proposed law needs to be cleared by the NCAs before going to Congress towards the end of this year. It is not known when Congress would consider the draft law or when/if it would be approved as the Moratorium will continue in effect until 2021.
1.1.2 New sector regulations for LMOs	Partially Completed	Regulations were proposed that fill gaps of current Law 27104, and shared with NCAs. However, they cannot be approved during the Moratorium unless the proposed new law (1.1.1) is approved to replace it.
1.1.3 Border control procedures for regulated LMOs	Completed	Existing regulations under Law 29811 were adjusted by a MINAM decree, defining institutional responsibilities and stipulating the control of LMOs entering Peru. Guides on border control procedures were issued and a list of products requiring LMO analysis was published.
1.2.1 Cooperation with neighboring countries for capacity building	Completed	The project attended regional biosafety Project Coordinator meetings in Ecuador and Guatemala. Cooperation relations were built between SANIPES and Cuba's National Center for Biological Safety, leading to a separate project that will start this year.
2.1.1 Clear administrative procedures and channels for handling LMO requests and approvals.	Partially Completed	The procedures of INIA have served as a model on which to build similar regulations for NCAs. A proposal was discussed for integrating institutional administrative procedures (TUPA) but the absence of sectorial biosafety regulations for NCAs and to some extent the Moratorium have prevented this process from moving forward.
2.1.2 Monitoring and enforcement plans and emergency response procedures for LMO risk assessment.	Completed	Procedures and a multi-sector plan for vigilance and early warning were designed and approved by MINAM decree in 2016. These describe the procedures to be taken and institutional functions. This output benefitted from participation in regional meetings and workshops on LMO risk analysis.
2.2.2 Procedures and criteria for reviewing and communicating biosafety procedures	Partially Completed	This is being considered in the proposed new law.

Output	Final Achievement Level	Comments
2.3.1 Technical norms for LMO monitoring and detection	Completed	The Compendium of Peruvian Technical Norms and Guides for its application were published by the Technical committee for the Normalization of GMO Biosecurity under INDEFOP, the national institute for competitiveness and protection of intellectual property.
2.3.2 Agreements on institutional competencies for LMO inspection and detection.	Completed	Institutional roles were agreed on by consensus of the Multi-sectorial Advisory Committee (CMA). Institutional competencies for the control and vigilance of LMOs were approved by government decree (DS 006-2016-MINAM).
2.3.3 Defined mandates and work agendas for Technical Working Groups	Completed	The Biosafety Technical Group of CONADIB has met every two months on relevant biosafety issues. Likewise, the technical group associated with the CMA has biosafety vigilance and early warning functions, and is elaborating a technical guide on bioethics.
2.3.4 Composition of the National Biosafety System with a national coordination mechanism, and procedures to formalize its legalization.	Completed	A draft law was prepared and is presently being reviewed by MINAM, after which it is expected to be submitted to the other National Competent Authorities and ultimately Congress for approval.
2.3.5 Capacity needs assessments for LMO detection capacity and performance evaluations	Completed	A consultant was contracted to develop a capacity development plan for biosafety that was submitted towards the end of the project, and proposes actions over a two-year term in different regions of Peru. The evaluator was told that MINAM intends to fund and implement the plan during this period.
2.3.6 National Capacity Building Plan for risk management.	Completed	Same as above.
2.3.7 Scoping exercise to formalize a reference laboratory system.	Completed	MINAM has designated four laboratories (two public, two private) for LMO detection; official certification is pending for three of these. Laboratory materials including reagents were purchased by the project for the INIA laboratory. A laboratory capacity building plan was elaborated and is expected to be implemented at some point.

Output	Final Achievement Level	Comments
2.4.1 Interaction and communication with key stakeholders – LMO applicants and decision-makers	Partially Completed	Three workshops were held on Genetic Resources, Biotechnology and Biosecurity with participation of NCAs and universities.
2.4.2 Dissemination materials and information available online.	Completed	Several informative materials were elaborated and are available on the BCH, MINAM and SENASA web pages. There are also hard-copy booklets, pamphlets and posters.
2.4.3 Confidentiality clauses for LMO applications.	Completed	Confidentiality clauses were established under Law 27104 (Title V, Chapter 4, Art. 47-50)
2.4.4 Assessment of awareness and opinions of stakeholders on LMO decision procedures and approval requirements.	Completed	A survey was conducted with NCAs to determine institutional perceptions and awareness levels regarding LMOs.
2.5.1 Joint actions with other biosafety initiatives.	Completed	The project collaborated in organizing the workshops on genetic materials, biotechnology and biosafety in the cities of Huánuco and Huancayo between 2012-2014, with San Martin National University, Valdivian National University and the regional government of Huanuco. There was also a workshop on Synthetic Biology in 2016, organized with Ricardo Palma University.
2.5.2 Collaboration for biosafety capacity building, including institutional agreements.	Complete	A Plan for Vigilance and Early Warning of liberated LMOs was implemented in the city of Chiclayo with participation of DGDB- MINAM, INIA and OEFA. A similar exercise was held in the southern section of Lima.
3.1.1 Sustained BS information management in NCAs with channels for public access	Partially Completed	This output was rated as “complete” in the project’s Final Report. Information management improvements have taken place through MINAMs website and the BCH, and can be accessed by the public. However, this has not developed into NCA network and information management processes related to LMOs are not operational at present. The evaluator considers that the output could merit a “partially completed” rating.

Output	Final Achievement Level	Comments
3.1.2 Updated and official BS information and databases, including expert lists.	Partially Completed	A list of experts has been elaborated but this needs to be officially approved. There is also a list of applicants to the official list that requires analysis in line with the requisites contained in Decision BS-IV/4.
3.2.1 Guidelines published for formulating and dealing with BS complaints and illegal LMO cases	Partially Completed	A proposal was developed by a project consultant but guidelines not been published officially due to the Moratorium and will require the approval of new legislation. The evaluator considers that this output could be considered "partially completed"
3.2.2 Regulation on Public Participation in Biosafety	Partially Completed	A proposal was developed by a project consultant. However, the approval of the proposed regulation is also affected by the Moratorium and will require the adoption of new legislation.
3.2.3 Agreements on reaching a more balanced representation of different sectors and stakeholders.	Completed	There is representation of relevant public/private stakeholders within the Multi-sector Advisory Committee (CMA) and technical working groups .
3.2.4 Dissemination of BS complaints and illegal case procedures to consumer associations and productive sectors.	Completed	The full achievement of this output as initially planned was affected by the Moratorium. The project supported MINAM and INIA in organizing 12 workshops on the importance of biosafety in selecting seed and ensuring vigilance towards LMOs, at different locations of the country.
3.3.1 Journalists, congressmen and university professors coached and briefed on biosafety.	Completed	The project participated in several workshops both internationally and nationally, and has organized meetings with the media. The project has also met with Congressional commissions dealing with biosafety, and send annual reports on the status of the Moratorium's implementation to Congress.
3.3.2 Communication and Education Strategy on Biosafety for MINAM	Completed	A communication strategy was developed on LMOs associated with agriculture, fisheries, medicine and human health. The communication strategy would be implemented over a two-year period with funding by MINAM.
3.3.3 Communication and educational	Completed	The project participated in several workshops both internationally and nationally, and has organized meetings with the media. The project has also met with Congressional commissions dealing with

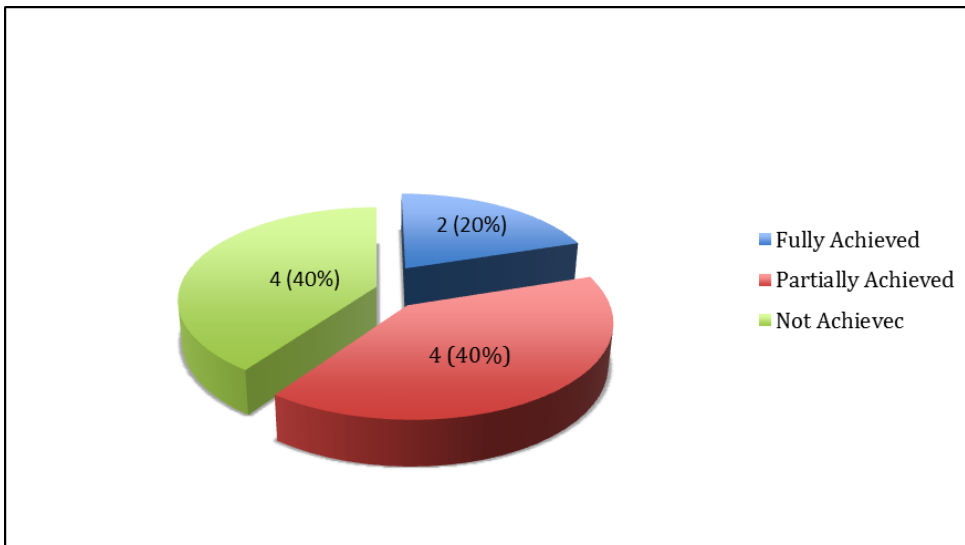


Output	Final Achievement Level	Comments
materials.		biosafety, and send annual reports on the status of the Moratorium’s implementation to Congress.
3.3.4 High level dialogues with agricultural producers and members of Congress on the importance of BS to the national economy.	Completed	There were meetings with farmers and Congress, as noted under outputs 3.3.1 and 3.2.4. The criteria for “high level” dialogue is not clear, however. The National Agricultural Convention (CONVEAGRO) has assisted the project in reaching its constituency of farmers. While the output is considered complete, several respondents feel that the dialogue initiatives should have been taken further.

**D.2 Achievement of Direct Outcomes (Evaluation Rating: Moderately Unsatisfactory)**

68. Levels of outcome achievement were generally below expectations. The direct outcomes considered most important to attain the intermediate states that precede impact were not achieved; the progression from outputs to outcomes (as described in the Theory of Change analysis) along the impact pathways did not always follow, and the drivers needed to support this transition are only partly in place. Only two outcomes were fully met, both involving increased regional cooperation for biosafety capacity building and information exchange. There was less progress towards more strategic outcomes that were situated at higher levels of the impact pathways and represented the “intermediate states” that needed to be reached to generate impact: The achievement of a fully functional administrative biosafety system (outcome 2.1) and decision-making practices based on scientific risk assessment, review and communication (outcome 2.2) were closely connected to the project objective yet their achievement was undermined by the lack of enabling regulations and legislation (outcome 1.1) and the absence of approved public participation mechanisms for biosafety decision-making.

**Figure 5: Achievement of Expected Outcomes**





69. The limited attainment of project outcomes was also influenced by the approval of Moratorium Law 298111 shortly after the project's approval, which restricts the entry or release of LMOs until 2021. The Moratorium superseded project objectives and outcomes that were associated with the implementation of an operational national biosafety framework with risk assessments and LMO decisions. Although several outcomes were unlikely to be achieved within the project timeframe following the Moratorium's approval, the project's design was not revised.

70. It is possible that GEF and UN Environment would not have accepted a substantive downscaling of expected outcomes and deliverables on which the project's approval was based. However, the issue should have been discussed at the inception stage or during the Mid-Term Review, and alternatives considered (including re-scheduling the project). The failure to adjust project design to changes in the national context at the inception stage was an oversight in adaptive management that necessarily influences this assessment, which is based on the outcomes and indicators contained in the project document.

***Component 1:***

Completing the regulatory framework on biosafety and its integration into national policies for sustainable development.

71. ***Outcome 1.1:*** New and revised biosafety regulations respond to national priorities and allow for full CPB compliance. ***Indicator:*** Actual legislation is revised. Gaps that affect compliance with the Cartagena Protocol on Biosafety are analyzed, improvements recommended and adopted. ***Evaluation Rating:*** Unsatisfactory.

72. The first outcome was not achieved due to factors that were external to the project. The analysis of existing legislation (Law 27104) revealed a number of gaps and inconsistencies that prevented full compliance with the Cartagena Protocol on Biosafety. In response, the project opted to propose new legislation that would replace Law 27104. This has involved an extended process of consultations that are still ongoing: The review of the proposed new biosafety law is currently in the final stage of internal review within MINAM and will subsequently be analyzed by other national authorities, adjusted accordingly and submitted to Congress for approval by the end of 2017. However, it is unlikely that the new law will be considered this year and there are uncertainties regarding the timing of its approval given other policy priorities. As noted earlier, the approval of a Moratorium on the importation and release of LMOs until 2021 lowered the urgency of approving a new legal-regulatory framework within the project's timeframe.

73. The slow progress in consolidating an enabling legal-regulatory framework has in turn lowered the delivery of other outputs and outcomes that were connected by causal pathways (as described in Section IV « Reconstructed Theory of Change »). Among the National Competent Authorities, only the National Institute for Agrarian Innovation (INIA) has approved internal biosafety regulations, whereas the Ministry of Production (PRODUCE) that is responsible for the fisheries sector recently approved internal regulations (ROFs) that formalize its role as NCA.

74. ***Outcome 1.2:*** Greater involvement in regional and sub-regional cooperation is achieved for joint capacity building, searching for synergies and generating bi/multilateral agreements. ***Indicator:*** Another country is willing to develop a joint project or harmonize criteria with Peru. ***Evaluation Rating:*** Satisfactory.

75. The project was instrumental in broadening Peru's access to technical cooperation for biosafety. In this respect, the project design foresaw South-South cooperation activities that benefitted from the network of GEF-UN Environment biosafety projects in the region. The project brokered the establishment of biosafety cooperation relations between Peru and other countries of the region. There were study tours and training courses on LMO detection and risk

management that involved national biosafety authorities and experienced practitioners from Cuba, Mexico, Colombia and Italy (including the International Center for Genetic Engineering and Biotechnology/ICGEB, based in Trieste). A joint project between Peru's Fisheries Sanitation authority (linked to PRODUCE) and Cuba's Center for Biological Safety (CSB) was approved and is expected to start this year. The initial proposal of harmonizing biosafety criteria with another country was discarded due to current gaps in the existing legislation, and due to the Moratorium that will remain in effect until 2021. Several interviewed trainees consider that Mexico's national biosafety framework offers a model that could be adjusted to Peru's needs.

**Component 2:**

Increasing the capacity to handle requests, carry out assessments, and take, communicate and enforce decisions, in a transparent and effective manner for the biosafety of LMOs.

76. **Outcome 2.1:** A fully functional administrative system for handling LMO requests is in place and maintained over time. **Indicator:** Integrated Texts of Procedures (TUPAs) for at least 3 NCAs covering mechanisms for presenting and responding to LMO applications. **Evaluation Rating:** Unsatisfactory.

77. A project consultancy proposed integrated administrative procedures for national authorities associated with the agricultural sector, based on the current regulations of Law 27014. A Compendium of Peruvian Technical Norms and Guides for its application were published. However, TUPAs have not been adopted because the NCAs (with exception of INIA) have not yet approved the internal sector regulations that are required to enable biosafety functions. Integrated guidelines are reportedly being applied by SENASA and SANIPES at ports and other points of international entity under the *Ventanilla Unica de Comercio Exterior* (a "one stop" window service for external trade), yet are not part of a "fully functional" administrative system for handling LMO requests.

78. **Outcome 2.2:** Biosafety decision-making is based on scientific risk assessments, and includes review and communication of decisions. **Indicators:** (i) Agreements on minimum technical-scientific requirements for LMO risk evaluations. (ii) Each NCA has defined the entity responsible for reviewing LMO decisions. (iii) Approved LMOs are communicated to the BCH Focal Point and communicated online. **Evaluation Rating:** Moderately Unsatisfactory.

79. Moratorium Law 29811 suspends the importation or release of LMOs until 2021. With the exception of INIA, National Competent Authorities lack the internal sector regulations needed to assume biosafety functions. Hence there is not an operational biosafety framework in place to review applications, analyze risks or take decisions on LMOs. This has undermined the outcome's achievement. However, there were partial advances in relation to some indicators: (i) A proposed guide for LMO risk analysis was prepared that is based on INIA's practices and is currently under technical review. (ii) In addition to the existing trans-sectorial Technical Biosafety Group (GTB, also known as the *Comité Multi-sectorial Asesor* or CMA), each National Competent Authority has its own GTS (Technical Sectorial Group) formed by experts in biosafety issues. INIA and DIGESA have defined their GTS, yet only INIA's GTS is active and meets regularly. Because sectorial regulations are still under development, LMO analysis and decisions are not taking place. (iii) MINAM has the capacity to communicate LMO decisions on food and processed products through the BCH. There have not been any requests to communicate LMO decisions thus far. Unfortunately, the progress that was achieved is insufficient to reach the expected outcome.

80. **Outcome 2.3:** Institutional mandates and capacity for risk management, including enforcement of decisions (compliance) and LMO monitoring, are strengthened. **Indicators:** (i) LMO control and detection procedures are standardized and quality control is assured. (ii) Training needs are identified and start to be addressed. (iii) Institutional competencies are

identified and decision-making responsibilities are clearly defined. (iv) The first steps are taken to formalize the National Biosafety System. (v) The first steps are taken to implement a system for LMO detection. *Evaluation rating:* Moderately Satisfactory.

81. This outcome was partially achieved. Biosafety mandates and risk management capabilities were strengthened among national authorities yet are not being applied in most cases, pending internal sector regulations (RIS) and the approval of integrated procedures (TUPAs) among NCAs. A “Compendium of Peruvian Technical Norms” and guides for its application were published by the Technical committee for the Normalization of GMO Biosecurity under INDEFOP, the national institute for competitiveness and protection of intellectual property. This is an official document that was adopted by MINAM and will be applied to the four laboratories selected for LMO detection (two of which have been accredited). In addition, procedures for detecting trans-boundary LMOs at points of entry and a cross-sector plan for vigilance and early warning were approved through Supreme Decrees 010-2014-MINAM and 011-2016.

82. Institutional capacity needs have been assessed and training activities (workshops, study tours) implemented, improving NCA capabilities for LMO risk management. Under this outcome, 12 courses were provided on LMO detection ( 2 courses), LMO decision-making (2 courses), vegetable biotechnology (1 Master’s Degree), bio-information (1 course), risk assessments (2 courses), application of LMO regulations (2 courses) and general overviews on biosafety (2 courses), benefitting a total of 29 trainees selected from the various Competent National Authorities.<sup>9</sup> However, the acquired capacity improvements are likely to decline over time if they are not applied and/or there continues to be high turnovers of technical staff.

83. **Outcome 2.4** Confidence is built between applicants, stakeholders and NCAs through transparency of procedures and criteria. *Indicators:* (i) Decision-makers are conscious of LMO approval procedures and consider them to be appropriate. (ii) Potential applicants understand procedures for approval of LMOs and consider the requirements to be appropriate and viable. *Evaluation Rating:* Unsatisfactory.

84. The requirement to approve LMOs is established by Law 27104. However, the outcome was not reached due to the absence of an operational biosafety system on which to base stakeholder interaction and build confidence. The Theory of Change analysis indicates that the achievement of this outcome depended to a large extent on the delivery of a “fully functional administrative system for handling LMO requests in place and maintained over time” (outcome 2.1) and “information-sharing among national authorities, sectors and countries” (outcome 3.1), neither of which were fully achieved. The project organized meetings to discuss LMO approval procedures and has formulated proposed guidelines for LMO risk assessment. However, these advances were insufficient to achieve the outcome.

85. While communications improved between National Competent Authorities as a result of the project, there continue to be polarized views on LMOs that range from their controlled release to the indefinite extension of Moratorium Law 29811. Twenty-seven of Peru’s 45 political-administrative regions have approved ordinances declaring transgenic-free territories. The Communication Plan to implement the Moratorium, which has been approved by MINAM, contains an analysis of institutional positions on biosafety that indicates high levels of polarization and reinforces the continuing need for consensus and trust building. While differing institutional/sector views are to be expected, confidence building is an incremental process that will require actual interaction under a functional biosafety framework.

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<sup>9</sup> Detailed information on the training courses and trainees is provided under Annex 4.

86. **Outcome 2.5:** Integration is achieved with other biosafety capacity-building initiatives. *Indicator:* Joint actions with other biosafety initiatives and the scientific community, with emphasis on capacity building. *Evaluation rating:* Satisfactory.

87. There were training workshops on genetic resources, biotechnology and biosafety in the cities of Huánuco and Huancayo with the participation of regional universities and the Peruvian Institute of Amazonian Research (IIAP). There was also collaboration with DGDB for an international workshop on synthetic biology, and a pilot plan for vigilance and early warning has been co-implemented with INIA and OEFA. Finally, there was collaboration for capacity building with biosafety authorities from Italy (ICGEB), Cuba, Mexico and Colombia.

**Component 3:**

Raising the level of public awareness, education and participation in biosafety and decision-making for LMOs.

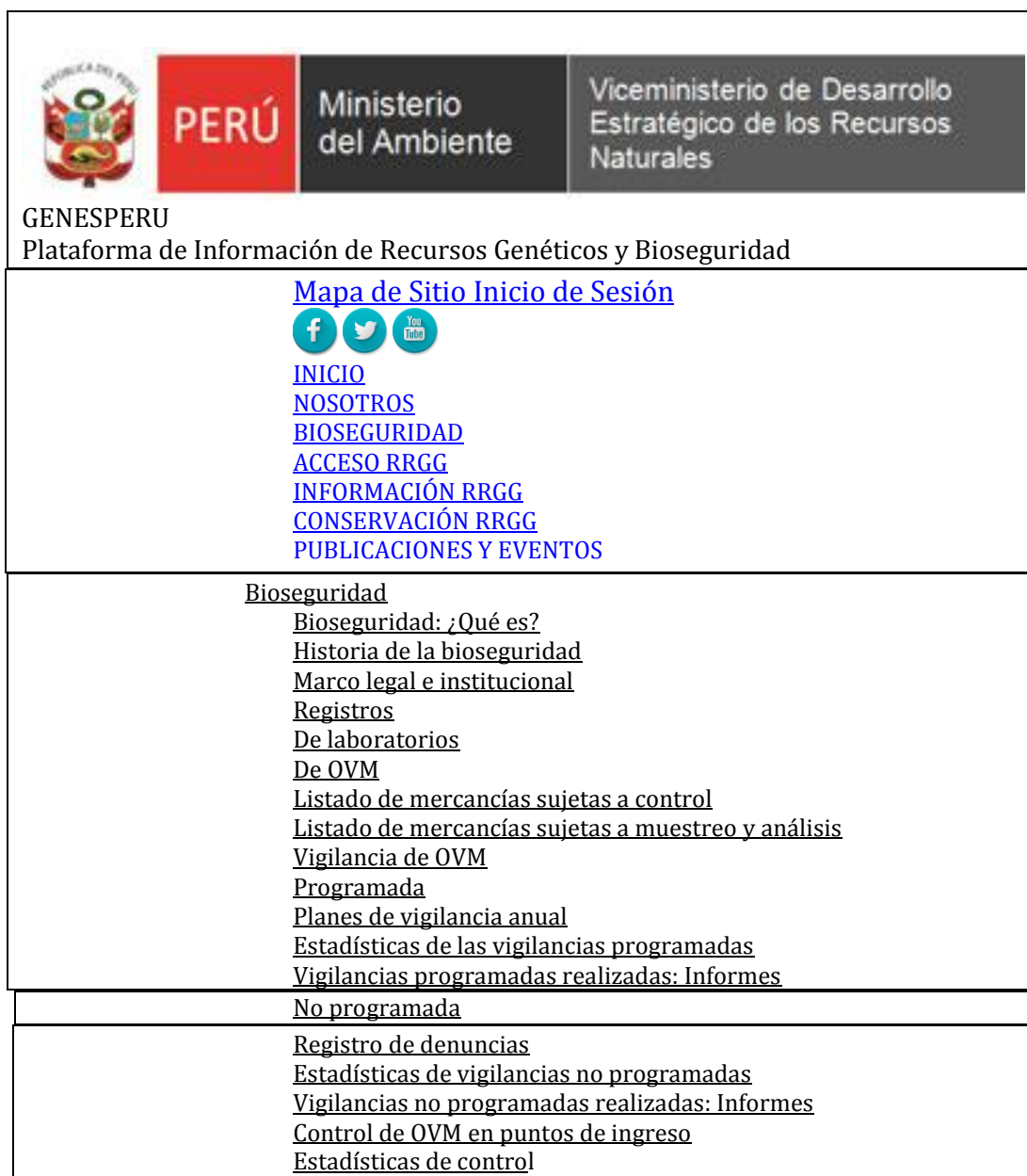
88. **Outcome 3.1:** Sharing of biosafety information amongst NCAs, between sectors, between countries, and for public access, is strengthened. *Indicators:* (i) Incremented administration of biosafety information between National Competent Authorities. (ii) Official list of biosafety experts. (iii) Peru shares biosafety information with other countries of the region. *Evaluation Rating:* Moderately Satisfactory.

89. There was partial progress towards this outcome. A biosafety information platform – GENESPERU - was designed and uploaded to the MINAM and BCH websites. The LMO monitoring and vigilance plan connects SENASA authorities at different points of control. National Competent Authorities are connected to the BCH and have been trained on its use. The list of biosafety experts is pending and candidates must meet international requirements to receive accreditation. Although NCA capacities for information sharing have improved, requests to communicate LMO decisions (for confined research) have yet to be received. The ongoing Moratorium and lack of an operational biosafety framework have lowered the demand for information.

90. **Outcome 3.2:** Public participation in biosafety and LMO decision-making is heightened and institutionalized. *Indicators:* (i) Procedures are initiated for managing biosafety complaints and cases of illegal LMOs. (ii) Regulation on participation is approved. (iii) The Inter-sectoral Technical Group agrees on the way to more effective biosafety representation in key sectors of society and regional governments. *Evaluation Rating:* Unsatisfactory.

91. The project developed a proposal for civil society participation that is based on existing legislation for public consultations on environmental matters. This has been incorporated to the proposed new biosafety law that is presently under review and will be submitted to Congress. The Inter-sectoral Advisory Committee (CMA) that was established under Moratorium Law 29811 combines public and private representation for the discussion of national biosafety policies and related issues. However, public participation mechanisms for biosafety have not been approved nor are they likely to be institutionalized in the near future - which was the fundamental aim of the third component. Again, the Moratorium's duration until 2021 may have lowered the perceived urgency of formalizing participatory mechanisms.

Figure 6: GENES-PERU: Biosafety Web Page



Source: MINAM.GOB.PE

92. **Outcome 3.3:** General awareness is raised regarding LMO and their use, particularly in the agricultural and food producing sectors. *Indicators:* (i) Increased number of research projects applying for biosafety prize. (ii) More frequent media coverage of biosafety topics. (iii) Journalists and reporters have a better understanding of biosafety concepts and university professors have raised their understanding of the new biosafety framework. *Evaluation Rating:* Moderately satisfactory.

93. The project supported baseline research on native cotton, peppers and corn varieties (for which Peru is place of origin). The project has organized workshops with agricultural producers,

the Peruvian Association of Seed Producers and Importers (APPIS), and the National Agricultural Convention (CONVEAGRO) that sits on the Multi-sector Advisory Committee (CMA) that was created to implement the Moratorium. Although the expected scale of awareness raising and media coverage was not quantified, the project increased the dissemination of biosafety information during its implementation. MINAM is likely to continue supporting public awareness through the “Communications Plan to Implement the LMO Moratorium” that was approved for the 2017-2018 period. However, broader and more sustained processes are needed to effectively reach the targeted sectors.

### **D.3 Likelihood of Impact (Evaluation Rating: Moderately Unlikely)**

94. The likelihood of impact is influenced by the degree to which “intermediate states” – the changes that are required between project outcomes and impact - were achieved at the time of the evaluation. These intermediate states are associated with higher-order outcomes (i.e. 2.1 and 2.2) that connect directly to the project objective, and are therefore essential to generate the expected impacts described in the project document.

95. The fundamental objective of the project was to “have a workable and transparent National Biosafety Framework in Peru that will contribute to the conservation and sustainable use of biodiversity by enabling full implementation of the Cartagena Protocol on Biosafety and national biosafety regulations.” The evaluation findings confirm that this objective was not achieved. However, the project did improve the enabling conditions for this to happen. Interviewed NCA participants and other stakeholders coincide in recognizing the project’s contribution towards (i) facilitating engagement and articulated work between sectors, placing national authorities on a more balanced level; (ii) raising the level of preparedness to manage a biosafety framework in accordance with the Cartagena Protocol on Biosafety; and (iii) positioning MINAM as the leading national authority on biosafety with over-arching coordination responsibilities. The approval of the proposed biosafety law and enabling sector regulations (including provisions for sanctions and enforcement) are essential to move forward beyond this point.

96. There is a low likelihood of impact in terms of achieving full responsiveness to LMO requests within the framework of the Cartagena Protocol. Likewise, there is a moderately low likelihood of impact associated with improvements to the legal and regulatory frameworks (at least in the short term). The likelihood of impact is affected by changes to the national context that include the approval of Moratorium Law 298111, successive changes of government with high turnovers of counterpart staff, and the present political juncture in which the main opposition party holds a majority in Congress.

97. The likelihood of impact depends to a large extent on the approval of proposed biosafety legislation that is currently being reviewed by MINAM and requires clearance from the other NCAs before it can be submitted to Congress for approval. The present situation has not changed substantially from that described by the 2014 Mid-Term Review, which concluded that “the lack of sectorial regulations is considered the major constraint to achieve the future implementation of the national biosafety framework”.<sup>10</sup> Without approved regulations it will be difficult to carry out all processes related to the implementation of laws 27104 and 29811. While the draft law is expected to reach Congress by the end of this year, the timeframe for the law’s discussion and approval is uncertain given the Moratorium’s duration until 2021. The

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<sup>10</sup> “Peru: Implementation of the National Biosafety Framework under the Biosafety Program: Mid Term-Review » pg. 14 (M. Araya, 2014)

uncertainties are reinforced by the current political juncture, in which biosafety is not a policy priority and the main opposition party holds a majority in Congress.

98. The following chart considers the likelihood of impact according to the project objectives and their indicators:

**Table 4: Likelihood of Impact**

Overall Objective:	Indicators/Targets	Likelihood of Impact	Comments
To have a workable and transparent national biosafety framework in place in Peru that will contribute to the conservation and sustainable use of biodiversity by enabling full implementation of the Cartagena Protocol of Biosafety (CPB) and of national biosafety regulations	100% of requests and emergencies are answered by the NCA. These requests are processed and resolved within the time limits of the law, and in accordance with the Cartagena Protocol on Biosafety (CPB)	Unlikely (U)	This will require the approval of new legislation to replace or succeed the present Moratorium Law, and the approval of internal sector regulations (RIS) and unified procedures (TUPAs) that are pending for most NCAs. This requires Congressional approval and sector policy decisions that are outside the control of the national executing agency.
<b>Specific Objectives:</b>			
1. To complete the regulatory framework on biosafety and its integration into national policies for sustainable development	1. A new-and- improved regulatory framework is adopted through correcting and supplementing the existing framework.	Moderately Unlikely (MU)	The likelihood of impact will depend on the approval of proposed new biosafety legislation that is currently being reviewed within MINAM, prior to submittal to other NCAs and Congress for approval. This is considered unlikely to happen in the near future given the political juncture and the Moratorium’s duration until 2021. A lobbying strategy is needed to guide the approval process.
2. To increase the capacity to handle requests, carry out assessments, and take,	NCAs are able to coordinate biosafety decisions, and resolve LMO applications within the time-limits set by law	Moderately Likely	Capacities were increased to an extent yet are not being applied. The likelihood of impact again depends on the timely approval of proposed biosafety legislation and internal sector regulations to



Overall Objective:	Indicators/Targets	Likelihood of Impact	Comments
<p>communicate and enforce decisions, in a transparent and effective manner for the biosafety of LMOs</p>	<p>NCA's are able to monitor authorized LMOs, and apply emergency plans</p> <p>NCA's are able to communicate decisions taken on LMOs, and facilitate risk assessment information</p>	<p>(ML)</p>	<p>replace or succeed the present Moratorium. If the national biosafety framework is not operationalized under the new law, capacity improvements are likely to decline over time.</p>
<p>3. To raise the level of public awareness, education and participation in biosafety and decision-making for LMOs</p>	<p>The frequency of visits to national BCH node increases.</p> <p>Each NCA has included biosafety in its own webpage and keeps the contents updated</p> <p>New information available, including NCA information released publically</p> <p>Different stakeholder groups are empowered to participate in, or promote, biosafety</p> <p>Policy instruments, regulations and incentives for promoting education, public participation and research in biosafety are adopted</p>	<p>Moderately Unlikely (MU)</p>	<p>There were advances in the delivery of planned outputs for this component, albeit not on the scale required to generate expected levels of impact. The BCH web page was updated and the DGDB is the designated national BCH node. A biosafety information system was designed that is planned to connect LMO entry points across the country and improve vigilance/ control. There were informational events targeting agricultural producers, the media and politicians. MINAM plans to implement a communications strategy to assist the Moratorium's implementation during the 2017-2019 period.</p> <p>The absence of an operating national biosafety system has limited potential impacts under this component, by lowering NCA engagement, the type of data uploaded to the BCH (no requests to communicate LMO decisions), and discouraging the approval of biosafety policies and regulations for public participation and education. The approval of the new biosafety law will be critically important to move awareness raising and participation processes forward.</p>



#### **E. Financial Management (Evaluation Rating: Moderately Unsatisfactory)**

99. Financial management was among the weaker aspects of the project's performance. It was affected by the different guidelines and formats used by UNOPS and UN Environment (despite both being part of the UN system). The difficulties encountered in financial accounting and reporting underscored the importance (and limited progress) of the "Delivering as One" and "One UN" policies that have been promoted over the past years. Financial performance was further affected by delays and delivery problems, both on the part of the national executing agency and UNOPS.

100. UNOPS was a logical candidate for providing administrative support services. MINAM had identified the need for an external institution to manage GEF funds, process payments and procure/contract goods and services. This is a common arrangement for government-executed projects that sidesteps bureaucratic procedures and other constraints that are often found in public sector budget systems. The Peru representation of the UN Office for Project Services (UNOPS) was contracted to manage GEF funds, receiving 6.4% of the total budget as an administrative overhead. UNOPS disbursed funds and provided reports of expenditure to the national project coordinator, who forwarded the data to UN Environment's Fund Manager. UNOPS also managed procurement and contracting for the project. These services were part of a broader agreement with MINAM that covered other activities as well.

101. Financial management was affected by reporting difficulties that stemmed from the different formats and criteria used by UNOPS and UN Environment. From past experience<sup>11</sup> it was known that both entities use different accounting systems, and their compatibility should have been analyzed before UNOPS was invited to join the project. MINAM entered the project without an understanding of Anubis, the reporting system used by UNEP for its biosafety portfolio, or the ATLAS format used by UNOPS.<sup>12</sup> The project team therefore had to translate the financial data received from UNOPS into UNEP's Anubis format for every financial report. This was time-consuming and detrimental to the project's efficiency.

112. The following incompatibility issues were brought to the evaluator's attention:

- The figures reported by the monthly expenditure reports often differed from those listed in the quarterly and annual reports. This occurred because some expenditures were not recorded until a month or more after the transaction's date.
- Annual audits were not applied because UNOPS is part of the UN system. Had audits been conducted they might have noted the incompatibility of financial reporting systems and suggested alternative arrangements.
- UNOPS closes its financial year in November. As a result, some end-of-year disbursements were not processed beyond this point and were sometimes delayed until to the next year.

113. Financial management was influenced by staff changes within UNOPS, and three program officers were assigned to the project during its implementation. An aggravating factor was the shift in accounting systems from ATLAS to "One UNOPS" in 2015 that stalled support services for several months. The combination of factors led to administrative delays that affected project implementation. This issue was raised at a joint MINAM-UNOPS meeting in August 2016 at which the project administrator documented 19 delayed payments for contracted

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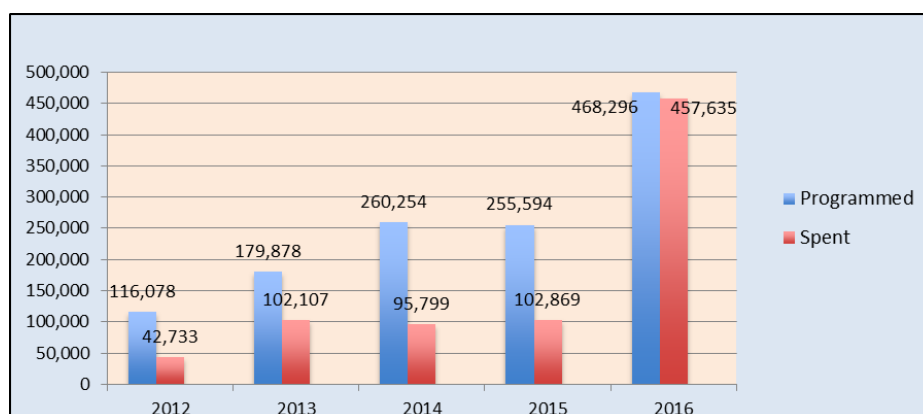
<sup>11</sup> UNOPS was contracted to manage the GEF grant under the UN Environment-GEF Project "Development of Mechanisms to Strengthen the Implementation of the Cartagena Protocol in Guatemala"

<sup>12</sup> ANUBIS was presented by the UN Environment Focal Point at the second meeting of the Project Advisory Committee in November, 2012.

services, 7 delayed procurements, unpaid tickets for workshop participants, and 10 delayed administrative actions on the part of UNOPS.

114. There were financial management issues on both sides. Project implementation was very slow and budget delivery well below the planned targets for most of its duration. The institutional change from CONAM to MINAM and vacancies of the project coordinator post contributed to this situation. Overall budget delivery was inconsistent and generally low over time until the final year (see Figure 7). Financial delivery increased drastically during the final year of project implementation, after the transition from ATLAS to One UNOPS was completed, with a corresponding increase in service demands.

**Figure 6: Financial Delivery 2012-2016: Planned vs. Actual Expenditure**



Source: Based on data from *Apéndice IV "Insumos de las Actividades de Proyecto y Servicios"* (UNOPS, no date) and *Estados Financieros y Reporte de Gastos, UNOPS* (July 2017).

Note: The accumulated unspent budget was re-programmed to 2016 following the approval of the project's extension and spent for the most part, reaching a final delivery rate of 98.7%.

115. It is important to recognize that many of the problems that undermined project performance were mitigated over time, as reflected in its 2016 budget delivery. At the time of the project's administrative closure US\$ 801,143.49 (98.7% of the total GEF budget) had been spent, of which more than half was disbursed in 2016.<sup>13</sup> Government co-financing contributions were fully disbursed and slightly exceeded the initially programmed amount. UNOPS agreed to extend support services during the project's one-year extension without charging an additional fee; the UN Environment Task Manager was important in encouraging this decision. At the project's end the assigned UNOPS staff documented lessons learned from the project<sup>14</sup> with recommendations for improving future services; this was a commendable initiative that should be replicated by other projects as well.

#### **F. Efficiency (Evaluation Rating: Moderately Unsatisfactory)**

116. Efficiency was the weakest aspect of project performance. This was influenced by factors both internal and external to the project. Shortly after the project's approval the national executing agency was upgraded from national commission (CONAM) to ministerial status

<sup>13</sup> *Estados Financieros y Reporte de Gastos, UNOPS* (July 2017)

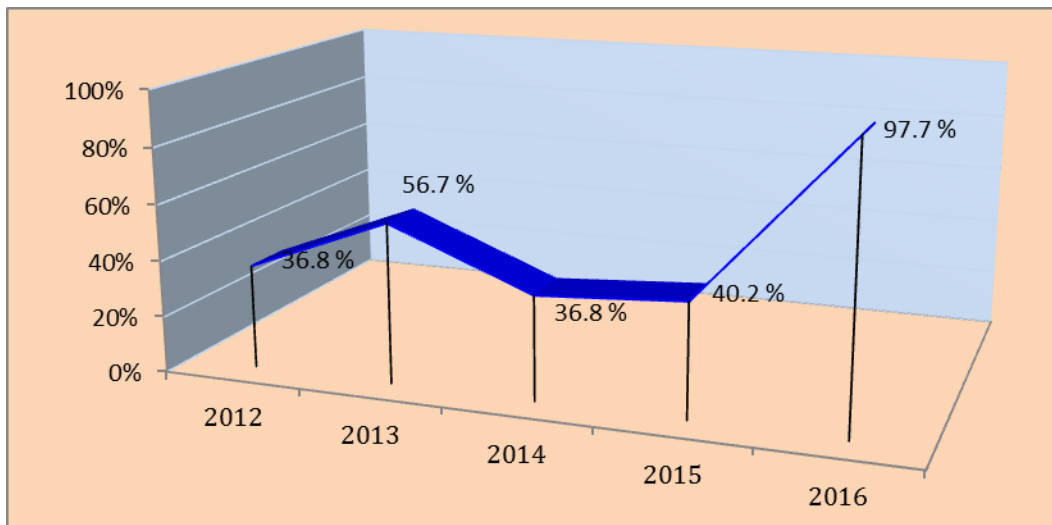
<sup>14</sup> *Lecciones Aprendidas Proyecto 80992 "Implementación del Marco Nacional de Bioseguridad en Perú – IMNB Perú"*, UNOPS (no date)

(MINAM), requiring a process of institutional re-structuring that was initially disruptive to implementation. The application of Moratorium Law 298111 undermined the feasibility of fully achieving several outputs and outcomes within the project period.

117. Low delivery was aggravated by the turnover of government partners – there were three changes of national government over the project cycle – and various technical staff who were trained by the project have since left their positions. Likewise, there changes of UNOPS staff and National Project Coordinators (three in each case) with under-budgeting and extended vacancies in the latter case. The designation of the NPC as a half-time position was intended to improve cost-effectiveness yet was counterproductive given the type and scale of deliverables that were expected. According to interviewed participants, the task of coordinating the participation of National Competent Authorities and other project partners, and translating their support needs into specific budgetary actions, was demanding and time-consuming during the initial project period.

118. Timesaving mechanisms were not apparent during implementation, and one of the key limiting factors to achieving impact was the lack of synchronization between project timelines and the Moratorium that expires in 2021.<sup>15</sup> Capacity improvements and policy proposals that were generated with project support are likely to lose momentum if they aren't applied in the near future. To a large extent this is contingent on the approval of a new biosafety law that is still being reviewed internally and requires approval by Congress.

**Figure 7: Annual Budget Delivery Rates: 2012-2016**



Source: Based on data from *Apendice IV "Insumos de las Actividades de Proyecto y Servicios"* (UNOPS, no date) and *Estados Financieros y Reporte de Gastos, UNOPS (July 2017)*.

119. Administrative delays were a recurrent issue and more so when UNOPS changed its financial accounting systems from ATLAS to "One UNOPS". In August 2016 the project team documented 19 delayed payments for contracted services, 7 delayed procurements, unpaid tickets for workshop participants and 10 delayed administrative actions on the part of UNOPS. Guidelines and formats were not synchronized between the UNOPS and UN Environment, despite

<sup>15</sup> An amendment to the logframe deliverables would have offered an opportunity for more efficient use of funds and other resources.

being part of the UN system. Each has different financial accounting systems and budget lines, which required the project team to translate the quarterly and annual expenditure data that was provided by UNOPS to the Anubis format. MINAM received the Final Expenditure report from UNOPS in July 2017, more than six months after the project was closed.

120. The evaluation recognizes that project delivery picked up considerably during the final year (2016), reflecting both the efforts made to expend the unspent portion of the budget before the project's finish, and improved performance by the new One UNOPS system as it became fully operational. In terms of cost-effectiveness, the evaluation recognizes that the project was able to extend implementation by an additional year with the approved budget.

**G. Monitoring and Reporting (Evaluation Rating: Moderately Satisfactory)**

121. The project followed the standard UN Environment monitoring processes and procedures. A Monitoring and Evaluation Plan was included in the project document (Section 6) and the Logical Framework (Annex 4) contained SMART indicators for each outcome. These indicators were viable for the most part and enabled the tracking of results. However, several of the indicators associated with awareness raising, public participation and communications under the third component were not quantified and were therefore hard to measure.

122. The project team prepared the various project reports – annual Project Implementation Reviews (PIRs), semi-annual Progress Reports, quarterly and annual expenditure reports – with financial data provided by UNOPS as co-executing agency. The PIRs however did not track the progress of outputs towards their targets, and only outcomes and activities were considered. Project oversight was to be provided by a project Steering Committee that would review progress reports and make recommendations for improving project implementation, and by the UN Environment Task Manager who is based at the Panama regional office. The Task Manager visited the project on monitoring visits and conducted the 2013 Mid-Term Evaluation.

123. M&E activities were assigned to responsible parties and reasonably costed, absorbing approximately 7% of the total project budget:

**Table 5: Monitoring and Evaluation Plan; Budgeted M&E activities**

<b>M &amp; E Task</b>	<b>Responsible Party</b>	<b>Estimated Cost (USD)</b>
Collecting baseline data in PY1: Investigation (Outcome 3.2)	MINAM, National Project Coordinator	3,000
Public surveys (Outcomes 2.4 and in part 3.3).		8,000
01 Inception workshop	MINAM, UN Environment	9,100
08 Steering Committee meetings	MINAM, National Project Coordinator	3,200
Coordination meetings with other initiatives	MINAM, National Project Coordinator	1,500
Annual Audits	MINAM, UN Environment	9,000

<b>M &amp; E Task</b>	<b>Responsible Party</b>	<b>Estimated Cost (USD)</b>
External evaluations: Mid term	MINAM, UN Environment	12,000
End of term		12,000
<b>TOTAL:</b>		<b>57,800</b>

124. The project performed satisfactorily in the design of a budgeted M&E Plan with suitable indicators, and in providing periodic progress and financial reports. The Mid-Term Review signaled the need to focus on raising delivery for the second and third components in particular.

125. Monitoring findings were expected to influence adaptive management and contribute to the mitigation of implementation problems. The project faced significant changes in the national context shortly after its approval. Institutional changes and the approval of the LMO Moratorium have had repercussion on project outcomes that envisioned a fully functional +biosafety system with LMO decision-making processes and public participation (i.e. 2.1, 2.2, 2.4, 3.2).

126. The Moratorium altered the project's baseline situation and called for revisions to the affected outcomes, outputs and indicators. There was need to adjust deliverables and expectations or alternatively, re-schedule the project's implementation for closer alignment to the Moratorium's timeline. This was not done; and in any case GEF or UN Environment might not have approved the downscaling of outcomes and other deliverables that were the basis of the project's approval. As a result, the project was unable to fully achieve several outcomes and outputs that were no longer viable yet remained in the Logical Framework. The oversight had an opportunity cost in terms of the level of impact that could reasonably be expected. The difficulties of achieving outputs and outcomes that were affected by the Moratorium should have been discussed at an early stage by the Steering Committee or considered by Mid-Term Review, and adjustments suggested to the project's design and work plans.

## **H. Sustainability**

### **H.1 Socio-political Sustainability (Evaluation Rating: Moderately Unlikely)**

127. The sustainability of project outcomes has a high degree of dependency on external factors. Socio-political sustainability depends to a large extent on the approval of the proposed new biosafety law that is being reviewed by MINAM and requires clearance by the other NCAs before it is submitted to Congress for approval. There are uncertainties regarding the timeframe for the approving the new legislation or level of political commitment to move the draft law through Congress. Until this happens, the existing laws - Law 27104 for the Prevention of Risks derived from Biotechnology and Law 29811 for the Moratorium on LMOs – remain in effect, in spite of the various legal gaps that prevent implementing at the national biosafety framework in line with the Cartagena Protocol. The approval of legislation on liability and redress for damages resulting from trans-boundary movements of LMOs (based on the Nagoya-Kuala Lumpur Supplementary Protocol) is also pending. One year after the project's termination, there are inconsistent levels of ownership, interest and commitment among government and among other stakeholders to sustain the project outcomes. According to various respondents, biosafety is not high on the policy agenda of the current government and it is likely that consideration of the new legislation would be postponed until that time.

128. Social sustainability is nurtured by ongoing debates on LMOs and transgenic crops that are led by NGOs and associations such as CONVEAGRO and the ASPEC consumer network.

This appears to be an active debate: 27 of Peru's 45 political-administrative regions have approved ordinances declaring themselves as transgenic-free territories. Another factor to consider is the need for increased continuity and scale in awareness raising and communication activities. The execution of the 2017-2018 Communications Plan for the Implementation of the Moratorium will be essential to inform targeted focus groups – farmers, the media, politicians and policymakers - on LMO issues and sensitize sectors of society on the importance of an operational biosafety system. MINAM has approved and earmarked funds to implement the Communications Plan during its two-year period.

## **H.2 Financial Sustainability (Evaluation Rating: Unlikely)**

129. Financial sustainability is weak. National Competent Authorities need to approve internal sector regulations (RIS) to assume biosafety functions and request budget allocations. The Moratorium and lack of integrated cross-sector administrative procedures (TUPAs) have delayed this process. In the absence of an operating system for LMO risk analysis and decisions, national authorities cannot charge for services; nor will they earmark funds or receive allocations until new legislation is in effect. The most tangible options for financial sustainability at present are the proposed legislation that is expected to be submitted to Congress by the end of this year, and the follow-up project proposal that is being prepared by MINAM for continued GEF and UN Environment support. However, another medium-size project cannot in itself address longer-term financial sustainability issues until enabling legislation is in place.

## **H.3 Institutional Sustainability (Evaluation Rating: Moderately Likely)**

130. Institutional biosafety mandates are established by Law 27104 for the Prevention of Risks derived from Biotechnology, and are expected to remain in place until new legislation is approved. New biosafety units were established within MINAM and PRODUCE. INIA has technical capacity and laboratory facilities to conduct confined LMO research. Four laboratories have been selected for LMO analysis and two have obtained accreditation. The Inter-sectorial Advisory Committee (CMA) created by the Moratorium continues to meet on a regular basis. Perspectives for institutional sustainability are high given the biosafety functions of MINAM, INIA, PRODUCE and DIGESA as National Competent Authorities. On the other hand, capacity improvements are likely to decline to the extent that they aren't applied. And there continue to be high turnovers of government staff with elections. Sustaining institutional capacities for biosafety risk management will depend (once again) on the approval of the new legislation that enables an operating biosafety framework.

## **I. Factors affecting Performance**

131. Institutional arrangements were adequate for the project's implementation: National Competent Authorities with biosafety mandates were designated under Law 27104 for the Prevention of Risks derived from Biotechnology. Each sector had a Technical Biosafety Group to assist the development of biosafety operations in NCAs. The Inter-sectorial Advisory Committee (CMA) established by Moratorium Law 29811 would assist the project's implementation. Biosafety capacities varied considerably between National Competent Authorities. However, the National Institute for Agrarian Innovation (INIA) already had internally approved biosafety functions and experience in LMO analysis that potentially offered a model for other NCAs.

132. However, preparation and readiness levels were weakened by changes in the project context that took place between the project's design and inception: The approval of Moratorium

Law 29811 prohibits the importation and release of LMOs for a ten-year period that expires in 2021. This development undermined the viability of several project outputs and outcomes that assumed functioning administrative systems for LMO risk analysis and decision-making. The effects of the Moratorium on specific project results did not lead to adjustments to the project's design. Nor was re-scheduling the project considered as an option to improve synchronization with the post-Moratorium period and raise the impact potential. As a result, important outcomes and outputs (including the "intermediate states" that link outcomes to impact) were not met and the ratings of impact achievement are what would have been the case had the deliverables or timelines been adjusted to more realistic levels. By the end of 2014 – three years into implementation - the project had spent about 25% of the GEF grant.

133. Low delivery was reinforced by administrative delays from the change of financial accounting systems within UNOPS. Another factor that weakened preparedness for the project was the transition of the National Environment Commission (CONAM) into the Ministry of Environment (MINAM). This led to a process of institutional re-structuring and expanded mandates that were initially disruptive to the project's implementation and institutional coordination. The project was executed by a Project Coordination Unit consisting of the National project director (from the national executing agency), national project coordinator and administrative assistant. This team was based at the General Directorate of Biological Diversity and assisted by DGDB's technical staff. As noted earlier, management performance was affected by CONAM's transition into MINAM and the successive changes of national project coordinators between 2011-2013 that included a six-month vacancy.

134. The budgeting of the national project coordinator post as a half-time position lowered the engagement and commitment of the project coordinator at the critical inception stage, and was eventually resolved by re-classifying the position as full-time. However, the duration of the post had to be shortened by six months to compensate for the additional budgetary cost. According to some project participants, the performance of the first National Project Coordinator was flawed by an anti-LMO stance that was inconsistent with the neutral position that was expected and generated tensions with some NCA participants.<sup>16</sup>

135. The *quality of project management and supervision* appeared to improve with the creation of the General Directorate for Biodiversity (DGDB) that directly assumed execution responsibilities, and the consolidation of a stable project team. These factors contributed to the significant improvement in budget delivery that took place during 2016. The supervision provided by UN Environment was competently managed an experienced Task Manager who advised the project on a regular basis. The Task Manager was instrumental in negotiating the extension of UNOPS services for the project's extension without raising the original fee. The evaluation's only critical observation regarding UN Environment's supervision was not encouraging discussions on adjustments to project design after the Moratorium Law was approved.

136. The project's design and institutional arrangements explicitly encouraged *stakeholder participation and coordination*. Efforts were made to build the cross-sector linkages and participatory dynamics that are essential to a functional biosafety system. The project foresaw the participation of National Competent Authorities and other partners (including the UN Environment Task Manager) in a Biosafety Advisory Group that functioned as a Steering Committee and met annually. The nucleus of the Biosafety Advisory Group was expected to evolve into an Inter-sectoral Advisory Group of NCAs in Biosafety with direct responsibility for LMO risk management and decisions.

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<sup>16</sup> This statement is based on respondent perceptions and the findings of the MTR. The evaluator was unable to interview the first National Project Coordinator, who could not be located.



137. One of the project's three technical components - raising the level of public awareness, education and participation in biosafety and LMO decision-making – explicitly sought to inform targeted groups such as farmers, media, and members of Congress, and propose mechanisms for public participation based on existing environmental norms. MINAM has approved and will fund a Communications Plan for implementing Moratorium Law 29811 during the 2017-2018 period. Interviewed participants were generally very positive on the level of consultation and participation exercised by the project.

138. In practice, however, the scale and depth of participation were below expectations due to the limited opportunities for implementing a functional administrative system with integrated procedures for LMO detection, risk assessment and decisions. Current restrictions on LMOs have lowered opportunities for the participation of national authorities and other stakeholders in detection and risk assessment activities. The level of institutional interest and commitment varied among NCAs, influencing their levels of participation. The project's design was highly technical and did not explicitly apply the *UN Common Approach to human rights or gender*. Only 7 of 29 training participants were female, although this may have reflected imbalances in the supply of technical experts who met the selection criteria. The project's concern for biosafety was in itself supportive of the human right to be informed and have access to safe foods and other products.

139. The project's national execution modality and institutional arrangements enabled high levels of *country ownership and driven-ness*. As noted above, the level of institutional interest determined actual ownership levels. MINAM demonstrated high levels of ownership as reflected in the creation of the General Directorate for Biological Diversity (DGDB). Several project deliverables such as the biosafety pages on the GENES-PERU website and the 2017-2018 Communications Plan have been appropriated by MINAM and are being implemented. The government co-financing contribution was slightly exceeded.

140. Not surprisingly, the levels of motivation and engagement varied among national authorities and project participants. Several CNAs fell short of their planned co-financing contributions, which were nevertheless balanced by increased in-kind contributions by MINAM, INIA and IIAP. The evaluator perceived high levels of ownership from representatives of the National Agrarian Convention (CONVEAGRO), Peruvian Consumers Association (ASPEC) and Ministry of Production (PRODUCE), which has approved internal regulations (ROFs) that establish NCA functions and created an internal biosafety unit under the National Authority for Fisheries Health (SANIPES). The biosafety attributions of the National Institute for Agrarian Innovation (INIA) were already defined under the existing legislation and the institute has conducted confined LMO research for some time. The proposed biosafety law does not address LMOs in processed foods for animal or human consumption (nor their labeling) and is therefore less relevant to DIGESA as representative for the health sector. According to several interviewed officials the level of institutional ownership and "buy in" to the project was weakened by tensions and lingering distrust between National Competent Authorities that were unaccustomed to working together.

141. Having *communications and public awareness* strategies in place are essential components of a national biosafety framework. These aspects were emphasized in the project's design and implementation strategy. One of the three immediate objectives (and its associated outcomes and outputs) aimed to raise the level of public awareness, education and participation in biosafety and LMO decision-making. Workshops and informational events were organized in Lima and several provinces in collaboration with CONVEAGRO, regional universities and other entities. Mechanisms for public participation were proposed and are contemplated under the proposed new biosafety law. MINAM has approved and will fund the implementation of a 2017-18 Communications Plan for implementing the Moratorium.



## VI. CONCLUSIONS, LESSONS AND RECOMMENDATIONS

### A. Conclusions

142. **Conclusion 1: The project has improved the enabling environment for approving and implementing a national biosafety framework, and has raised the understanding of LMO risk management by National Competent Authorities.** The project's main contributions were (i) facilitating engagement and coordinated work between National Competent Authorities of different sectors, in a manner that placed them on a more balanced level; (ii) raising institutional capacities to manage a biosafety framework in accordance with the Cartagena Protocol on Biosafety; and (iii) positioning MINAM as the leading national authority on biosafety with overarching coordination responsibilities. Internal sector units with biosafety responsibilities were created within MINAM and PRODUCE. A national Control and Vigilance system to mitigate the unauthorized entry of LMOs has been approved and is presently being implemented. Two laboratories have been accredited for LMO detection and risk analysis, and two more are in process of accreditation. International cooperation relations were expanded with biosafety institutions in the region. The progress that was achieved needs to be sustained and expanded under an operational national biosafety framework, or capacity improvements and other project contributions will decline over time.

143. **Conclusion 2: Progress was made towards an operational biosafety system and overall project performance was rated as moderately satisfactory. However, the main objective of implementing the national biosafety system was not achieved and key outcomes weren't reached or were only partially reached.** Overall project results were below expectation, in part due to changes in the project context that affected the viability of key deliverables. The fundamental objective of having a functioning biosafety system with integrated procedures for LMO risk assessments and decision-making could not be reached for factors that were often external to the project. The gaps in the existing legislation do not presently allow for the implementation of a biosafety framework in accordance with the Cartagena Protocol, and the new legislation that was drafted is still under review. The approval of a Moratorium Law on the importation and release of LMOs until 2021 lowered the viability of outputs and outcomes that foresaw operational LMO risk management and decision-making processes within the project timeframe.

143. While all outcomes ultimately led to the project objective, having a functional biosafety system with informed decision-making was the fundamental requisite for attaining the project objective and goal. As a result (and in the absence of design adjustments) insufficient progress was made towards strategic outcomes that were directly connected to the project objective and represented intermediate states that precede impact. The achievement of objective and intermediate states required the approval of revised legal-regulatory frameworks linking National Competent Authorities and sectors. However, this required political decisions that were largely outside the project's attributions or ability to influence.

145. **Conclusion 3: The likelihood of impact depends on the approval of a proposed new biosafety law and the approval of sector regulations that formalize biosafety mandates among National Competent Authorities.** The achievement of objective and intermediate states requires approval of revised legislation and regulatory framework among sectors, which is going to Congress and requires political decisions that are largely outside the project's ability to control. While all outcomes ultimately led to the project objective, having a functional biosafety system with informed decision-making was the fundamental requisite for attaining the project objective

and goal. Limited progress was made towards strategic outcomes that were directly connected to the project objective and, according to the Theory of Change analysis, represented “intermediate states” that had to be reached to have the expected impact. Achieving the objective and these intermediate states required the approval of revised legislation and sector regulations, which involves political decisions that are largely outside the project’s (or MINAM’s) influence.

146. **Conclusion 4: Project timelines were insufficient for some of the expected deliverables, despite the approved extension.** A recurrent bottleneck that affects biosafety projects in the region is the inadequacy of project timelines allocated for the revision or approval of new legislation. As noted earlier, this involves dynamics and timing that is outside the project’s control and have tended to surpass the project’s duration, which is based on GEF guidelines. Project time and real time tend to vary, particularly when legal or other systemic changes are sought. The extended time needed to draft and build consensus around a new biosafety law that continues under internal review and will hopefully be submitted to Congress by the end of year, was detrimental to the achievement of other outcomes that were built around a functioning biosafety system.

147. **Conclusion 5: Project performance was affected by a changing and at times difficult operating environment.** The project was executed by the Ministry of Environment (MINAM) and subsequently through the General Directorate for Biological Diversity (DGDB). The project faced several challenges over the 8 years spanning design to implementation. These included the approval of a ten-year LMO Moratorium in 2011 that weakened the viability of several outcomes, the internal change processes associated with CONAM’s shift from commission to ministerial status as MINAM, three changes of national government between the project’s design, approval and implementation, three changes of National Project Coordinator with an extended vacancy, three changes of UNOPS project officer, the disruptive change of accounting systems by UNOPS, and high staff turnover within Peru’s public sector. Implementation was difficult under these conditions and required considerable adaptive management. As the DGDB and Project Coordination Unit achieved stability, project performance improved and reached high delivery levels during the final year.

148. The final performance ratings for the various evaluation criteria are given below:

**Table 6: Evaluation Ratings**

Criterion	Comments	
<b>A. Strategic relevance</b>	<p>The project was highly relevant to the Cartagena Protocol on Biosafety and UN Conference for Conservation of Biodiversity. It was consistent with GEF 4’s Strategy for Financing Biosafety of Sub Program-6 (Building Capacity for the Implementation of the Cartagena Protocol on Biosafety) and Biodiversity Strategic Objective 3 (SO3), as well UN Environment’s for Environmental Governance sub-program under the 2010-2013 Medium Term Strategy (MTS) and bi-annual Programs of Work (PoWs).</p> <p>Likewise, the project directly supported Moratorium Law 28911 by working towards the development of an operational and effective biosafety system. However, the Moratorium’s programmed expiration in 2021 lowered the urgency to develop a functional biosafety framework within the project timeframe. Capacity building activities were based on South-south cooperation. Peru is one of 17 mega-diverse countries in the world according to the World Conservation Monitoring Centre, and place of origin and domestication for food crops.</p>	<p>S (5)</p>

Criterion	Comments	
<b>B. Achievement of outputs</b>	Output delivery was low for the most of the project's duration yet increased significantly during the final year. By the end of the project most of the project's outputs had been fully achieved.	S (5)
<b>C. Effectiveness: Attainment of project objectives and results</b>	The project's overall effectiveness is rated as moderately unsatisfactory.	MU (4)
1. Achievement of direct outcomes	Two of ten outcomes were fully reached and four outcomes were partially reached. The most important outcomes that represented intermediate states preceding impact were not achieved, largely due to the absence of enabling legislation and sector regulations to enable an operational biosafety system with LMO risk assessment and decision-making mechanism.	MU (3)
2. Likelihood of impact	The likelihood of impact on the expected scale is dependent on the timely approval of proposed new biosafety legislation and internal sector regulations to formalize a functional system. Improved NCA capacities and preparedness are likely to decline if they are not applied. The Moratorium Law prohibits the entry of listed products containing LMOs. A national LMO Control & Vigilance system has been approved and is being applied to prevent the entry of LMO grain, seed and other products.	MU (3)
3. Achievement of project goal and planned objectives	The project objective of establishing a functional and effective national biosafety system was not achieved although conditions for implementing this have improved as a result of the project. Two NCAs have created internal divisions with biosafety responsibilities, and a national LMO Control & Vigilance mechanism has been introduced.	U (2)
<b>D. Sustainability</b>	Overall sustainability is rated as moderately likely at present, although this will depend to a large extent on the approval of proposed biosafety legislation by Congress.	ML (4)
1. Financial	Biosafety activities cannot be budgeted until new legislation is approved and internal sector regulations (RIS) are adopted by all NCAs. However, two internal biosafety units created within MINAM and PRODUCE have received funding from internal budgets. The Moratorium Law mandates national preparedness for a functional biosafety system by 2021.	ML (4)
2. Socio-political	Peru subscribes to the Cartagena Protocol and NCAs with biosafety mandates are designated under existing Law 27104. Moratorium law 29811 mandates the establishment of national capacities and policies to effectively manage LMO risks by 2021. A national LMO control and vigilance program is approved and being implemented. Proposed legislation has been drafted and is in process of receiving clearance by Competent Authorities, after which it will be submitted to Congress.	ML (4)
3. Institutional framework	Peru subscribes to the Cartagena Protocol and NCAs with biosafety mandates are designated under existing Law 27104. MINAM is recognized as the lead NCA for biosafety. The Moratorium Law expires in 2021 by which time legal and institutional arrangements will need to be in place. MINAM and PRODUCE have created internal units that would biosafety functions once these are formally approved and operational.	L (5)

Criterion	Comments	
4. Environmental	Environmental sustainability is likely given the project's support for implementing the Cartagena Protocol on biosafety and protecting Peru's biodiversity. The baseline mapping of native corn, potato and cotton species with project support contributes to environmental sustainability of Peru's biodiversity.	HL (5)
Catalytic role and replication	The present levels of achievement and consolidation of results do not strongly encourage replication and are unlikely to catalyze changes without further support and/or the approval of new legislation.	MU (3)
<b>E. Efficiency</b>	Delivery was very low for most of the project term and the project had to be extended. Output and budget delivery improved during the final year. Efficiency was undermined by successive turnovers of national project coordinators and UNOPS officers, the absence of a project coordinator for an extended period, the process of re-organizing CONAM (the national executing agency) into MINAM, three changes of government and the introduction of a new UNOPS financial management system.	MU (3)
<b>F. Factors affecting project performance</b>		
1. Preparation and readiness	Preparation was weakened by the institutional transition of CONAM to MINAM, the change of government at the inception stage, high turnovers of staff within the project and NCAs, mixed levels of NCA interest and commitment, and the incompatibility of UN Environment and UNOPS reporting systems.	MU (3)
2. Project implementation and management	The project was initially affected by the institutional shift from CONAM to MINAM, the designation of the National Project Coordinator as a half-time position, and successive changes in NPCs with an extended vacancy. As the new DGDB and Project Coordination Unit gradually stabilized, management performance improved as reflected in higher project delivery during the final year.	MS (4)
3. Stakeholders participation and public awareness	The project design and implementation arrangements supported stakeholder participation. One of the project components was devoted to participation and awareness raising. A mechanism for public participation in LMO decision-making processes was drafted and incorporated to a proposed new biosafety law. MINAM will implement a Communications Plan in support of the Moratorium's implementation during 2017-2018. NCAs were exposed to the Biosafety Clearinghouse and a biosafety page was created within the MINAM website (GENES	S (5)
4. Country ownership and driven-ness	MINAM and DGDB demonstrated high levels of country ownership as national executing agencies, whereas ownership and commitment levels varied among other NCAs. Government co-financing commitments were met.	MS (4)
5. Financial planning and management	The financial reporting systems used by UN Environment and UNOPS were incompatible and required considerable revising by the project team. The shift in financial accounting and tracking systems (Atlas to One UNOPS) by UNOPS led to recurrent delays in procurement and disbursements. Financial management performance improved during the final year	MU (3)
6. UNEP supervision and backstopping	The UNEP Task Manager provided guidance and backstopping when requested. However, the possible need to adjust the project's design and deliverables in view of the Moratorium Law on LMOs was not	MS (4)

Criterion	Comments	
	addressed.	
7. Monitoring & evaluation	The project met the standard M&E requirements. Backstopping and guidance were provided by the Task Manager when requested. The status of outputs was not reported in the PIRs, which were focused instead on activities. The effect of the Moratorium's approval on the viability of several outputs and outcomes was understood, yet adjustments to the affected deliverables and indicators were not considered viable at thMe time.	MS (4)
a. M&E Design	The standard requirements were met.	S (5)
b. Budgeting and funding for M&E activities	Same as above.	S (5)
c. M&E Plan Implementation	Overall implementation was moderately satisfactory. The Task Manager conducted monitoring visits. The need to adjust the project's design and deliverables to the Moratorium Law does not appear to have been detected or discussed.	MS (4)
<b>Overall Rating</b>	<b>Overall project performance is considered Moderately Satisfactory (MS) based on the evaluation criteria and rating scores.</b> The project did not achieve its general objective and partially reached most of its expected outcomes. However, the project has directly contributed to (i) the creation of two biosafety divisions within National Competent Authorities, (ii) the establishment of a national LMO control and vigilance system that is operational, (iii) the approval of integrated administrative procedures for LMO risk analysis for the agricultural sector, and (iv) the accreditation of two laboratories for LMO detection (with two more in process of accreditation). These achievements represent advances towards a functional national biosafety framework. Comprehensive biosafety legislation has been drafted with the participation of NCAs and is in process of being cleared for submittal to the National Congress for approval. However, general project performance was barely satisfactory and the final score is at the lower end of the MS rating scale.	<b>Moderately Satisfactory (4.0)</b>

*Performance Rating Scale: Highly Satisfactory (HS): 6, Satisfactory (S): 5, Moderately (MS): 4, Moderately Unsatisfactory (MU): 3, Unsatisfactory (U): 2, Highly Unsatisfactory (HU): 1  
The ratings for the sustainability criteria are Highly Likely (HL): 6, Likely (L): 5, Moderately Likely (ML): 4, Moderately Unlikely (MU): 3, Unlikely (U): 2 and Highly Unlikely (HU): 1.*

## **B. Lessons Learned**

149. **Lesson 1: Projects have a strategic implementation sequence based on their design, that should be followed in order to maximize results and impact.** The strategic implementation sequence of this project started within the first project component and culminated in the higher order outcomes of the second component. The revision of the legal and regulatory frameworks (outcome 1.1) fed into the formalization of institutional mandates and integrated procedures (outcome 2.3) that in turn enabled a fully functional administrative system with informed LMO decisions and transparent procedures (outcomes 2.1-2). The inter-linkages of outputs and outcomes, both within and between the project's technical components, should

have been considered when planning their implementation sequence. The simultaneous and *ad hoc* implementation of project outputs can raise project delivery, yet can also lower technical quality or exceed the absorptive capacity of recipient institutions. A sequenced implementation approach based on causal pathways is likely to take more yet ultimately raise aggregate impact.

150. **Lesson 2: The difficulties faced in revising the legal and regulatory frameworks within the planned timeframe are a recurrent problem that affects the performance of other biosafety projects.** The project's four-year period and one-year extension were insufficient to approve and implement new legislation, or to establish an operating and efficient biosafety system. This is a common situation that is encountered by other projects as well. The dynamics of legislative and policy change processes fall outside the linear logic that guides project design, and tend to be compressed within short timelines or budgets. In such cases time limitations are reinforced by the inherent complexity of the tasks and the expectations that are generated. The recurrence of similar situations in other biosafety and environmental governance initiatives suggests the need to consider new options, such as the anticipated approval of successive project phases that are based on a ten-year horizon and require the achievement of periodic benchmarks to enable continued funding.

151. **Lesson 3: Adaptive management is necessary to cope with changing project contexts.** The failure to adjust planned outputs and outcomes following the approval of Moratorium Law 29811 affected their level of achievement. The Moratorium supported the project objective by mandating an integrated legal and regulatory framework with enhanced institutional capabilities. However, it also affected the viability of achieving the objective and other key outcomes that foresaw an operational biosafety system - with risk assessment and decision-making functions - within the approved project timeframe. Institutional capacity improvements have not been applied, in part because LMO detection and analysis are restricted under the Moratorium (except for confined research), and are likely to decline over time unless they are put to practice.

152. The evaluation considers that the lack of adjustments to project deliverables and timelines following the Moratorium Law's approval was an oversight in adaptive management. It might not have been possible to downscale outcomes or other deliverables that were the basis for the project's approval. However, the issue should have been discussed and actions considered at the project inception stage or during the Mid-Term Review. The alternative of re-scheduling the project to align implementation with the Moratorium period should have been considered. Because the evaluation of project achievement is necessarily based on the approved logical framework and impact indicators, the failure to adjust deliverables and expectations to changing circumstances can be detrimental to their assessment

153. **Lesson 4: Politically-informed lobbying strategies are needed to ensure the timely approval of enabling legislation and policies.** Six years after the project's approval, a proposed new biosafety law is being reviewed by MINAM and will require clearance from other NCAs before it is submitted to Congress. Changing national legal or regulatory environments involve different dynamics that are often removed from the linear processes that are assumed in project planning. When these situations are anticipated, project design should consider technical and budgetary support to assist lobbying efforts, public relations and information events that are directed at congressional commissions and other government decision-makers. This requires another dimension of technical assistance that is politically savvy and attuned to decision-making processes.

**C. Recommendations:**

154. **Recommendation 1: The fundamental priority for the national executing agency and Competent National Authorities is to secure the approval of new biosafety legislation by Congress.** The project assisted the drafting of a new biosafety law, sector regulations and integrated procedures for LMO risk management. Institutional capacities were raised with the cooperation of biosafety institutions from the region. At present, the development of Peru's national biosafety framework cannot advance further – and will gradually lose momentum - until enabling legislation and regulations are approved. This has required an extended process. A proposed new law is being reviewed and would be submitted to Congress by the end of this year. However, there is uncertainty regarding the timing of its approval or the attention the draft law will receive, given the Moratorium's extension until 2021 and other policy priorities. Another factor to consider is the main opposition party's majority in Congress. It is therefore essential that MINAM and DGDB track the draft law's progress and take time to inform legislators, organize promotional events and seek lobbying support.

155. **Recommendation 2: MINAM and the National Competent Authorities need to articulate a lobbying strategy to ensure the approval of the proposed new biosafety law by Congress in coming sessions.** The need for such a strategy is supported by the evaluation findings. Relations need to be built with the congressional commissions that view environmental and health policy. The biosafety message needs to be expanded to emphasize economic benefits – i.e. enhanced market opportunities and prices for non-transgenic crops, the importance of non-transgenic foods to Peru's gastronomy and tourism sectors – in addition to the environmental risks of not having a system in place.

156. **Recommendation 3: Further project support from GEF and UN Environment should be synchronized with the approval of the new biosafety law and/or the Moratorium's expiration in 2021.** Having a coherent legal and regulatory framework in place is essential to move forward in developing Peru's national biosafety framework. To a large extent, the capacity improvements and other advances that were achieved with project support are likely to lose momentum and decline over time, unless the Moratorium is replaced by new legislation and sector regulations are approved. While the evaluator agrees that continued GEF-UN Environment support is still needed to achieve the project objective, there is little point in investing additional resources prematurely for technical proposals and capacity improvements that are unlikely to be used. For this reason, the approval of a follow-up project should be contingent on the approval of a new law and regulations that enable the implementation of a national biosafety system with LMO risk management mandates (and liability provisions) in accordance with the Cartagena Protocol. Alternatively, further support should be scheduled to succeed the Moratorium.

157. **Recommendation 4: Future capacity building for LMO risk management should include "hands on" practical training and simulations that are based on real cases.** The technical training offered by the project was provided by recognized experts, yet was theoretical and lacking in practical exposure. Most of the trainees have not had an opportunity to apply knowledge that was gained more than a year ago. Although the LMO Moratorium restricts opportunities for LMO analysis and risk management, it does not address the confined LMO research that is practiced by the National Institute for Agrarian Innovation (INIA), which also has laboratory facilities. Future training initiatives should be designed to include in-country "hands on" components that follow actual LMO assessments, through agreement with INIA or other laboratories that have applied for accreditation.

158. **Recommendation 5: Future biosafety initiatives in Peru should seek alignment of biosafety policies with neighboring countries in order to monitor trans-boundary LMO movements.** This was included as an indicator for one of project's expected outcomes, but

wasn't feasible in the absence of an approved and viable legal-regulatory framework. Once new legislation and sector regulations are approved, the harmonizing of biosafety guidelines and formats at the main points of entry will be increasingly necessary to control the flow of transgenic grains and other GM crops.

159. **Recommendation 6: GEF and UN Environment need to ensure that the financial accounting and reporting systems of collaborating international agencies are compatible. This issue should be appraised at the design stage and incorporated as a selection criterion.** The differing budget lines, formats and accounting criteria used by the Anubis and Atlas (now One UNOPS) systems generated additional workload demands, led to delays and lowered project efficiency as is documented in this report. In particular the use of incompatible systems between collaborating UN entities weakens their comparative advantages as GEF partners, and undermines the "One UN" and "Delivering as One" corporate goals. Demonstrated administrative competence and compatible financial accounting/reporting practices should be adopted as criteria for the appraisal of potential partner agencies.



## **ANNEXES**

## Annex 1

### TERMS OF REFERENCE

**Terminal Evaluation of the UN Environment/Global Environment Facility project:**

**“Implementation of the National Biosafety Framework under the Biosafety Program - Peru”**

#### Section 1: PROJECT BACKGROUND AND OVERVIEW

##### 1. Project General Information

2.

**Table 1. Project summary**

Sub-programme:	Environmental Governance	Expected Accomplishment(s):	Pow Accomplishment: b) The four outputs under this expected accomplishment relate to the provision of legal and technical support to Governments to develop and enforce laws and strengthen institutions to achieve internationally agreed environment.
UN Environment approval date:	November 2010	Programme of Work Output(s):	
GEF project ID:	3633	Project type:	Medium Size Project
GEF Strategic Programme #:	Biodiversity 3	Focal Area(s):	Biodiversity
GEF approval date:	August 2010	GEF Strategic Priority/Objective:	Strategic Programme 6: Building the capacity for the effective implementation of the CPB
<i>Expected</i> start date:	February 2011	Actual start date:	June 2012
<i>Planned</i> completion date:	November 2014	Actual completion date:	December 2016
<i>Planned</i> project budget at approval:	US\$ 1,879,330	Actual total expenditures reported as of date:	(15/12/2016) US\$ 811,804.00
GEF grant allocation:	US\$ 811,804	GEF grant expenditures reported as of [date]:	
Project Preparation Grant (PPG)- GEF financing:	US\$ 24,560	Project Preparation Grant - co-financing:	US\$ 14,000
<i>Expected</i> Medium-Size Project/Full-Size Project co-financing:	US\$1,067,526	Secured Medium-Size Project/Full-Size Project co-financing:	USD 945,011.35 (30/11/2016)
First disbursement:	24 November 2011	Date of financial closure:	TBD
No. of revisions:	6	Date of last revision:	May 2016

No. of Steering Committee meetings:	8	Date of last/next Steering Committee meeting:	16 June 2014
Mid-term Review/Evaluation (planned date):	January 2014	Mid-term Review/Evaluation (actual date):	May 2014
Terminal Evaluation (planned date):	May 2017	Terminal Evaluation (actual date):	May 2017
Coverage (Countries):	Peru	Coverage - Region(s):	(National) Latin America

### 3. Project rationale

Peru is a center of origin of genetic diversity and of several species, many of which are agricultural. The reconciliation of food security, imminent trade agreements, and a growing internal biotechnology sector with biosafety and the conservation of traditional use of land races, are of great importance to Peru.

Following the development of a National Biosafety Framework (NBF) in Peru and the creation of a Biosafety Clearing House (BCH), both through former UN ENVIRONMENT-GEF projects executed by CONAM (National Council for the Environment), Peru established the basic foundations needed to implement a NBF and ensure an adequate level of protection to the environment in the use of Living Modified Organisms (LMOs). The challenge that remained following these initiatives however was to finish what was started with respect to implementing the Cartagena Protocol on Biosafety (CPB) at the national level. The need for increased capacity within National Competent Authorities (NCAs) as well as greater awareness on biosafety issues among authorities and the public was highlighted as being a key requirement for the effective implementation of the NBF in Peru.

Given that there already is a strategic Government decision to promote modern biotechnology as well as its transboundary trade, the implementation of a biosafety framework was seen as a counterbalance measure if constructed in a participatory and responsible manner. By implementing such a framework in line with CPB objectives and through a UN ENVIRONMENT-GEF project, the balance between the use of, and safeguards for, modern biotechnology would become evident.

Through the project "Implementation of the National Biosafety Framework for Peru", the Government anticipated to continue its capacity building efforts, targeted in particular at the human and institutional levels, in order to enable Peru to act in accordance with its priorities for sustainable development, and to take coherent technical decisions concerning LMOs. This project was primarily designed to strengthen the capacities of National Competent Authorities (NCAs) on biosafety issues - particularly in legal, procedural, technical and communications. It would endeavor to identify the needs of each institution to implement the NBF and provide resources to assist with this purpose.

### 4. Project objectives and components

The objective of the project in Peru is: "To have a workable and transparent NBF in place in Peru that will contribute to the conservation and sustainable use of biodiversity by enabling full implementation of the CPB and national biosafety regulations". The target (or indicator) for this objective is that "100% of emergency cases are answered by the National Competent Authorities (NCAs), and that requests are processed and solved within the legal terms". The project has 3 technical components, with a 4th relating to Project Management.

Table 2 – Project components and expected outcomes

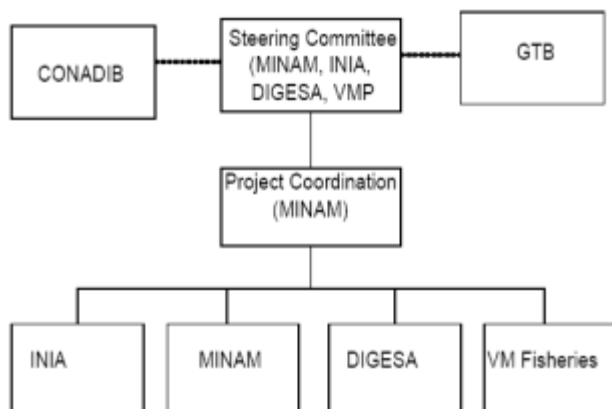
Project component	Outcomes
Component 1: Completing the regulatory framework on biosafety and its integration into national policies for sustainable development.	<ul style="list-style-type: none"> <li>○ New and revised biosafety regulations respond to national priorities and allow for full CPB compliance.</li> <li>○ Greater involvement in regional and sub-regional cooperation is achieved for joint capacity building, searching for synergies and generating bi/multilateral agreements.</li> </ul>
Component 2: Increasing the capacity to handle requests, carry out assessments, and take, communicate and enforce decisions, in a transparent and effective manner for the biosafety of LMOs.	<ul style="list-style-type: none"> <li>○ A fully functional administrative system for handling LMO requests is in place and maintained over time.</li> <li>○ Biosafety decision-making is based on scientific risk assessments, and includes review and communication of decisions.</li> <li>○ Institutional mandates and capacity for risk management, including enforcement of decisions (compliance) and LMO monitoring, are strengthened.</li> <li>○ Confidence is built between applicants, stakeholders and OSC through transparency of procedures and criteria.</li> <li>○ Integration is achieved with other biosafety capacity-building initiatives.</li> </ul>
Component 3: Raising the level of public awareness, education and participation in biosafety and decision-making for LMOs	<ul style="list-style-type: none"> <li>○ Sharing of biosafety information amongst OSC, between sectors, between countries, and for public access, is strengthened.</li> <li>○ Public participation in biosafety and LMO decision-making is heightened and institutionalized.</li> <li>○ General awareness is raised regarding LMO and their use, particularly in the agricultural and food producing sectors.</li> </ul>

### 5. Executing Arrangements

The GEF Implementing Agency for the project was UN Environment acting as intermediary between the GEF and the executing agency in Peru. In this capacity, UN Environment had overall responsibility for the implementation of the project, project oversight, technical support and coordination with other GEF project

In Peru, the Executing Agency was the Ministry of the Environment of Peru (MINAM) through the General Directorate for Biodiversity (DGDB). UNOPS provide support in the development of contracts, hiring of personnel, amongst other duties. MINAM was responsible for the supervision of activities undertaken during project implementation, and DGDB was responsible for book keeping and preparation of all reports to UN Environment. There was a Project Coordination Unit comprised of: a National Project Director (appointed by the MINAM) whose function was to liaise between the MINAM and the Project; a Project Coordinator responsible for the operation of the Project; technical and administrative/financial assistants responsible for assisting the Project

Coordinator in the technical and administrative aspects of the project to ensure timely project operations; and a project Advisory Group that acted as the Project Steering Committee and whose role was to review project progress and advise on project implementation, by providing feedback and coordinating actions that imply joint interventions. The Advisory Group was constituted on the basis of the Intersectoral Working Group of NCAs in Biosafety. The UNEP Task Manager was invited to join the Advisory Group, and was an important member for all project monitoring and evaluation processes. The project's overall organizational chart is presented below:



#### 6. Project Cost and Financing

The project falls into the medium-size project (MSP) category. The project budget was US\$ 1,879,330 of which US\$ 811,804 was requested from the GEF and US\$ 1,067,526 was to be derived from national counterpart funds. Peru's co-financing contribution would consist in 100% local contribution from the entities participating in the project. See Table 3 below.

Table 3 - Estimated project cost in Peru

Financing source	Amount (USD)
GEF Trust Fund	811,804
Co-financing (National counterpart funding, comprising 163,572 in cash (15%) and 903,954 in kind (85%))	1,067,526
Total	1,879,330

#### 7. Implementation Issues

In Peru, the project is making progress towards the accomplishment of its main objective, which is to have an operational biosafety system that will bring benefits for biodiversity conservation. In this regard, improvements to the current biosafety framework have been useful. With regard to the completion of a regulatory framework on biosafety and its integration into national policies for sustainable development, the proposal of a new law on Biosafety and its regulation, according with the Cartagena Protocol, is still pending revision and approval from the NCA. There has been a notable increase in capacity in Biosafety for LMOs; many specialists of Peru have been trained in early detection and monitoring of GMO, risk evaluation and risk analysis, and also in GMO Detection. Four laboratories for the detection of LMOs analysis have also been approved. With regard to raising public awareness, education and participation in biosafety for LMOs, several biosafety activities related to Law N° 27104 and N° 29811 have been postponed because these laws are still being revised and adjusted. There was a Mid Term Review (MTR) completed in in March 2014 to assess project performance (in terms of relevance, effectiveness and efficiency), and determine the likelihood of the project achieving its intended outcomes and impacts,

including their sustainability. Some of the challenges identified included: difficulty in engaging decision-makers and NCAs in the project activities; limited in-country technical expertise in biosafety matters; and slow rate of pledged counterpart funding.

## Section 2. OBJECTIVE AND SCOPE OF THE EVALUATION

### 8. 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 a follow-up project is likely [or 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 consultant’s minds all through the evaluation exercise and is supported by the use of a theory of change approach. This means that the consultant 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 and needs regarding the report. The Evaluation Manager will plan with the consultant 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.

### 9. Objective of the Evaluation

In line with the UN Environment Evaluation Policy<sup>17</sup> and the UN Environment Programme Manual<sup>18</sup>, 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

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<sup>17</sup> <http://www.UN Environment.org/eou/StandardsPolicyandPractices/UN ENVIRONMENTEvaluationPolicy/tabid/3050/language/en-US/Default.aspx>

<sup>18</sup> [http://www.UN Environment.org/QAS/Documents/UN ENVIRONMENT\\_Programme\\_Manual\\_May\\_2013.pdf](http://www.UN Environment.org/QAS/Documents/UN ENVIRONMENT_Programme_Manual_May_2013.pdf) . *This manual is under revision.*

accountability requirements, and (ii) to promote operational improvement, learning and knowledge sharing through results and lessons learned among UN Environment and the main project partners (Vice ministry of Fisheries (VMP-PRODUCE), National Institute for Agrarian Innovation (INIA), General Direction for Environment Health (DIGESA), Peruvian Amazonia Research Institute (IIAP), National Service for Agricultural Health (SENASA) and Peruvian Sea Institute (IMARPE)). Therefore, the evaluation will identify lessons of operational relevance for future project formulation and implementation, especially for the additional phases of biosafety projects, if applicable.

#### 10. Key Strategic Questions

In addition to the evaluation criteria outlined 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:

To what extent was the project able to assist Peru to establish and consolidate a fully functional and responsive regulatory regime that responds to their obligations under the Cartagena Protocol, as well as their 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 in Peru to ensure that biosafety becomes part of their permanent action?

To what extent was the project able to assist Peru to establish and consolidate a functional national system that can monitor and follow up the LMO releases and their possible effects on the environment?

#### 11. 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.

##### 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:

##### i. *Alignment to the UN Environment Medium Term Strategy<sup>19</sup> (MTS) and Programme of Work (POW)*

The evaluation should assess the project's alignment with the MTS and POW under which each 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.

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<sup>19</sup> 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.

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

GEF strategic priorities will vary across interventions. UN Environment strategic priorities include the Bali Strategic Plan for Technology Support and Capacity Building<sup>20</sup> (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 interventions are suited, or responding to, the stated environmental concerns and needs of the countries, sub-regions or regions where they are being implemented. Examples may include: national or sub-national development plans, 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 each 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. 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 are 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 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.

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<sup>20</sup> <http://www.UN Environment.org/GC/GC23/documents/GC23-6-add-1.pdf>



#### 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 each 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 supervision<sup>21</sup>.

##### *ii. Achievement of Direct Outcomes*

The achievement of direct outcomes is assessed as performance against the direct outcomes as defined in the reconstructed<sup>22</sup> Theory of Change. These are the first-level outcomes expected to be achieved as an immediate result of project outputs. As in (i) above, a table can be used where substantive amendments to the formulation of direct outcomes are 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://web.unep.org/evaluation/working-us/theory-change>) 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.

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

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<sup>21</sup> 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.

<sup>22</sup> 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 project design as risks or as part of the analysis of Environmental, Social and Economic Safeguards.<sup>23</sup>

The evaluation will consider the extent to which the project has played a catalytic role or has promoted scaling up and/or replication<sup>24</sup> 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 Goals<sup>25</sup> 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.

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<sup>23</sup> Further information on Environmental, Social and Economic Safeguards (ESES) can be found at <http://www.UNEnvironment.org/about/eses/>

<sup>24</sup> *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.

<sup>25</sup> A list of relevant SDGs is available on the EO website [www.UNEnvironment.org/evaluation](http://www.UNEnvironment.org/evaluation)

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.

#### 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 SMART<sup>26</sup> indicators towards the achievement of the project's 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 project's 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 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.

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<sup>26</sup> SMART refers to indicators that are specific, measurable, assignable, realistic and time-specific.

*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*

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 socio-political, institutional or financial sustainability, as appropriate.

### 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 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-3 and GEF-4 policies, strategies and programmes pertaining to biosafety at the time of the project's approval;  
Project design documents (including minutes of the project design review meeting at approval);  
Annual Work Plans and Budgets or equivalent, revisions to the project (Project Document Supplement), the logical framework and its budget;  
Project reports such as six-monthly progress and financial reports, progress reports from collaborating partners, meeting minutes, relevant correspondence and including the Project Implementation Reviews and Tracking Tool etc.;

Project outputs

Mid-Term Review of the project implementation in Peru;

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

UN Environment Task Manager (TM);

Project management team;

UN Environment Fund Management Officer (FMO);

Project partners (see Section 8 para. 21) , including national executing agencies, project coordinators, members of the national coordinating committees and advisory group/steering committee;

Other relevant resource persons.

Field visits of 4-5 days in each country to be scheduled in consultation with the project team and the Evaluation Office of UN Environment;

Other data collection tools as may be deemed useful.

#### 12. Evaluation Deliverables and Review Procedures

The consultant will prepare and submit the following deliverables for each project:

- 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 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 standalone 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 Bulletin: a 2-page summary of key evaluation findings for wider dissemination through the EOU website.

Review of the draft evaluation report. The consultant 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 consultant 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 consultant 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 consultant 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 consultant. 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.

### 13. 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 (Marianela Araya), Fund Management Officer (Lydia Eibl-Kamolleh) 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 team 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 May/2017 to November/2017 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 is required. Knowledge of Spanish language along with excellent writing skills in English is required. Experience in managing partnerships, knowledge management and communication is desirable for all evaluation consultants.

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 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>).

#### 14. Schedule of the evaluation

The table below presents the tentative schedule for the evaluation.

Table 3. Tentative schedule for the evaluation

Milestone	Tentative timeline
Kick-off meeting	May 2017
Inception Report	June 2017
Evaluation Mission – 4-5 days in each country (based on meeting arrangements and available budget)	July 2017
Presentation on preliminary findings post-mission	July 2017
Telephone interviews, surveys etc.	May – July 2017
Draft report to Evaluation Manager (and Peer Reviewer)	August 2017
Draft Report shared with UN Environment Project Manager and team	September 2017
Draft Report shared with wider group of stakeholders	October 2017
Final Report	November 2017
Final Report shared with all respondents	November 2017

#### 15. Contractual Arrangements

Evaluation Consultant 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 certify 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:

Schedule of Payment for the [Consultant/Team Leader]:

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) or to ANUBIS, and if such access is granted, the consultant agree 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 consultant 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 consultant's fees by an amount equal to the additional costs borne by the Evaluation Office to bring the report up to standard.

## Annex 2

### Evaluation Itinerary

Institution	Name	Date and Time
MINAM	Hernán Tello	10 July – 09:30
	Miriam Cerdán	10 July – 15:00
INIA	Jorge Alcántara	11 July – 10:00
IIAP	Luís Campos / Fausto Hinostraza	11 July – 15:00
PRODUCE	Elba Prieto	12 July – 10:00
ASPEC	Flora Luna	12 July – 15:00
DIGESA	Mirtha Rosario Trujillo / Carmen Galeno	13 July – 10:00
CONVEAGRO	Luis Málaga	13 July – 15:00
UNOPS	Fernando Cotrim/Humberto Gore/Julia Melina Urbano	13 July – 14:30
MINAM	Miriam Cerdán / Hernán Tello	14 July – 10:00

### **Annex 3**

#### **Evaluation Bulletin**

The project contributed improved the enabling conditions for the approval and implementation of Peru's national biosafety framework, and has raised the understanding of biosafety and LMO risk management among National Competent Authorities. Although progress that was made, the main project objective of implementing the national biosafety system was not achieved and key outcomes were either not reached or partially reached. Overall project results were below expectations, in part due to changes to the project context that affected the viability of key deliverables. Project timelines were insufficient for some of the expected deliverables, despite an approved extension. Project performance was additionally affected by a changing and at times difficult operating environment.

The project terminated activities in June 2016. The sustainability and the likelihood of impact of project-supported initiatives depend largely on the approval of a proposed new biosafety law and the approval of sector regulations that formalize biosafety mandates among National Competent Authorities.

## Annex 4

### Listing of Project Training Courses and Trainees

N°	Fechas		Título de la Capacitación	Profesional	Institución
	Inicio	Final			
	01/07/2013	05/07/2013	Curso Strategic Approaches in the Evaluation of the Science Underpinning GMO Regulatory Decision-making, ICGEB, Italia	David Castro	DGDB-MINAM
1	09/12/2013	20/12/2013	Master Internacional en Bioseguridad en Biotecnología Vegetal de la Universita Politecnica Delle Marche, Italia	Francisco Villamón	IMARPE
2	23/06/2014	28/06/2014	Bioinformática en el ICGEB, Italia	André Rosado	Proy. IMNB
3	10/09/2015	11/09/2015	Primer Taller Internacional sobre evaluación de riesgos ambientales de peces transgénicos organizado - CONABIO México	David Castro	DGDB-MINAM
				Julio Frisancho	DGDB-MINAM
5	28/09/2015	02/10/2015	Curso Taller Detección de OGM organizado por la CIBIOGEM de México	Jorge Alcántara	INIA
				Yeny Aquino	INIA
				Juan Martos	SENASA
	13/10/2015	19/10/2015	III Taller Científico Bioseguridad 2015 y Visitas a Autoridades de Regulación de los OVM en Cuba	Jorge Alcantara	INIA
				Carmen Galeno	DIGESA
10	19/10/2015	23/10/2015	Taller Internacional Scientific and Technical Approaches in GMO Decision Making Trieste, Italia	Carlos Scotto	UNFV
7	18/01/2016	20/01/2016	Taller Teórico Práctico de Capacitación en Análisis de Riesgo organizado por CIBIOGEM, México	Jorge Alcántara	INIA
				Alvaro Aparicio	MINAGRI
				Carmen Galeno	DIGESA
4	14/03/2016	18/03/2016	Tercer Curso Regional para el Fortalecimiento de capacidades en Bioseguridad de Organismos Genéticamente Modificados - CIBIOGEM México	Dora Pariona	DGDB-MINAM
				Julio Frisancho	SANIPES
	11/05/2016	13/05/2016	Misión Técnica a Cuba	Diana Garcia Julio Frisancho Alfredo Rebaza	SANIPES
				Giovanna Sotil	IMARPE
				Elba Prieto	PRODUCE
				Hernan Tello	DGDB-MINAM
8	01/07/2016	05/07/2016	Curso Análisis de Riesgo del ICGEB, Italia"	David Castro	DGDB-MINAM
	29/10/2016	05/11/2016	Capacitación y Visita Técnica Bioseguridad para OVM en ICA-Colombia	Claudia Gonzalez Carmen Galeno Rafael Huapaya	DIGESA
				Alfredo Rebaza	SANIPES
				Omar Caceres	INS
				Jorge Alcantara	INIA

Source: Reporte Final Proyecto IMNB Peru (12/2016)

**Annex 5**

**Project Cost and Co-financing Table**

Component/sub- component/output	Estimated cost at design	Actual Cost	Expenditure ratio (actual/planned)
1-4	US\$ 1,879,330	US\$ 1,880,927.78 <sup>27</sup>	1.01 <sup>28</sup>

Co-financing (Type/Source)	UNEP own Financing (US)		Government (US)		Other* (US)		Total (US\$)	Total Disbursed (US\$)	
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Planned	Actual
-Grants	811,804	811,804	163,572	163,572			975,376	975,376	975,376
-Loans									
-Credits									
-Equity investments									
-In-kind support			903,954	905,551,78				903,954	905,551,78
-Other(*) - -									

<sup>27</sup> Difference reflects additional co-financing contributions by MINAM, INIA and IIAP

## Annex 6

### Documents Consulted

GENES.PERU Biosafety Webpage ([www.minam.gob.pe](http://www.minam.gob.pe))

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”:  
Project document and annexes

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”:  
Project Implementation Review (PIR) reports 2013-2016

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”:  
Semi-Annual Progress Reports 2013-2016

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”: Mid-  
Term Review

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”:  
Quarterly Expenditure Reports 2014-2016

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”:  
Budget Revisions A-F

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”: Mid-  
Term Review (if available, to be confirmed)

“PERU: Implementation of the National Biosafety Framework under the Biosafety Program”:  
Final Project Report (*Informe de Proyecto Final*)

Minutes of the meetings of the *Comite de Asesoramiento* (Inter-sectorial Working Group)

*“Plan Nacional de Comunicaciones para la Implementación de la Moratoria”* (MINAM, 2016)

## **Annex 7**

### **Consultant Biodata**

Hugo Navajas is an independent consultant in environmental conservation and sustainable development who is based in Bolivia. Much of his work over the past 20 years has involved environmental project/program design and evaluation for international agencies, foundations and global NGOs. Hugo's clients have included the United Nations Environment Programme (UNEP), United Nations Development Programme (UNDP), UN-Habitat, the Global Environment Facility (GEF), the GEF Small Grants Programme (GEF-SGP), the World Bank, the Gordon and Betty Moore Foundation, and the International Center for Local Environmental Initiatives (ICLEI) among others.

To date he has conducted environment-related consultancies in over 45 countries around the globe. Hugo also serves on the Board of Directors of PROMETA, an environmental NGO devoted to environmental conservation, sustainable development and protected area management in southern Bolivia.

## Annex 8: Quality Assessment of the Evaluation Report

Evaluation Title: Peru: Implementation of the National Biosafety Framework under the Biosafety Program

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	Draft Report Rating	Final Report Rating
<b>Substantive Report Quality Criteria</b>			
<p><b>Quality of the Executive Summary:</b></p> <p>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.</p>	<p><b>Draft report:</b> Not rated</p> <p><b>Final report:</b> It is adequately summarised and captures the main highlights of the evaluation</p>	5	5
<p><b>I. Introduction</b></p> <p>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.)</p> <p>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?</p>	<p><b>Draft report:</b> The introduction is satisfactory and covers the required detail.</p> <p><b>Final report:</b> No further comment</p>	5	5



<p><b>II. Evaluation Methods</b></p> <p>This section should include a description of how the <i>TOC at Evaluation</i><sup>29</sup> 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.</p> <p>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><b>Draft report:</b></p> <p>The section is satisfactorily done.</p> <p><b>Final report:</b></p> <p>No further comment</p>	<p>5</p>	
<p><b>III. The Project</b></p> <p>This section should include:</p> <ul style="list-style-type: none"> <li>• <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).</li> <li>• <i>Objectives and components:</i> Summary of the project's results hierarchy as stated in the ProDoc (or as officially revised)</li> <li>• <i>Stakeholders:</i> Description of groups of targeted stakeholders organised according to relevant common characteristics</li> <li>• <i>Project implementation structure and partners:</i> A description of the implementation structure with diagram and a list of key project partners</li> <li>• <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</li> <li>• <i>Project financing:</i> Completed tables of: (a)</li> </ul>	<p><b>Draft report:</b></p> <p>The section has been dealt with satisfactorily. Required detail is sufficiently covered</p> <p><b>Final report:</b></p> <p>Requested changes have been made</p>	<p>5</p>	<p>5</p>

29 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*.

budget at design and expenditure by components (b) planned and actual sources of funding/co-financing			
<p><b>IV. Theory of Change</b></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><b>Draft report:</b></p> <p>The TOC is presented clearly in both diagrammatic and narrative forms.</p> <p><b>Final report:</b></p> <p>The TOC diagram is clear, logical and it sufficiently depicts the project's causal pathways.</p>	5	5
<p><b>V. Key Findings</b></p> <p><b>A. Strategic relevance:</b></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"> <li>v. Alignment to the UN Environment Medium Term Strategy (MTS) and Programme of Work (POW)</li> <li>vi. Alignment to UN Environment/GEF/Donor Strategic Priorities</li> <li>vii. Relevance to Regional, Sub-regional and National Environmental Priorities</li> <li>viii. Complementarity with Existing Interventions</li> </ul>	<p><b>Draft report:</b></p> <p>The section is covered in accordance with the TOR and includes the requested relevance aspects.</p> <p><b>Final report:</b></p> <p>Same comment as above</p>	5	
<p><b>B. Quality of Project Design</b></p> <p>To what extent are the strength and weaknesses of the project design effectively <u>summarized</u>?</p>	<p><b>Draft report:</b></p> <p>This section and provides a clear and detailed analysis of the project design. The rating provided is however not well justified. the initiative has suffered a loss of strategic relevance at national level because it was affected by the moratorium</p> <p><b>Final report:</b></p> <p>Requested amendments have made</p>	4.5	5

<p><b>C. Nature of the External Context</b></p> <p>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.</p>	<p><b>Draft Report:</b></p> <p>This section is very well analysed. The findings show adverse implications of the moratorium on relevance to national priorities, level of ownership, effectiveness and sustainability of outcomes</p> <p><b>Final report:</b></p> <p>No further comment</p>	6	6
<p><b>D. Effectiveness</b></p> <p><b>(i) Outputs and Direct Outcomes:</b> 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.</p>	<p><b>Draft report:</b></p> <p>Effectiveness section is discussed in detail and objectively. The achievement of outputs is very well analysed and gives an account of the status of each planned output. The assessment is cross-referenced to the TOC analysis as well.</p> <p><b>Final report:</b></p> <p>Further improvements have been made to the chapter in the final draft</p>	5	6
<p><b>(ii) Likelihood of Impact:</b> 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?</p> <p>How well are change processes explained and the roles of key actors, as well as drivers and assumptions, explicitly discussed?</p>	<p><b>Draft report:</b></p> <p>Likelihood of impact is objectively assessed. Cross referencing has been made to other relevant sections to further the arguments made</p> <p><b>Final report:</b></p> <p>Section has been improved in the final draft following the incorporation of review comments received</p>	5	6
<p><b>E. Financial Management</b></p> <p>This section should contain an integrated analysis of all dimensions evaluated under financial management. And include a completed 'financial management' table.</p> <p>Consider how well the report addresses the following:</p> <ul style="list-style-type: none"> <li>• <i>completeness</i> of financial information, including the actual project costs (total and per activity) and actual co-financing used</li> <li>• <i>communication</i> between financial and project management staff and</li> <li>• <i>compliance</i> with relevant UN financial</li> </ul>	<p><b>Draft report:</b></p> <p>Section is covered adequately.</p> <p><b>Final report:</b></p> <p>No further comments</p>	5	5

management standards and procedures.			
<p><b>F. Efficiency</b></p> <p>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"> <li>• Implications of delays and no cost extensions</li> <li>• Time-saving measures put in place to maximise results within the secured budget and agreed project timeframe</li> <li>• 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.</li> </ul>	<p><b>Draft report:</b></p> <p>Section is covered adequately. Minor suggestions have been provided</p> <p><b>Final report:</b></p> <p>No further comments</p>	5	5
<p><b>G. Monitoring and Reporting</b></p> <p>How well does the report assess:</p> <ul style="list-style-type: none"> <li>• Monitoring design and budgeting (<i>including SMART indicators, resources for MTE/R etc.</i>)</li> <li>• Monitoring implementation (<i>including use of monitoring data for adaptive management</i>)</li> <li>• Project reporting (<i>e.g. PIMS and donor report</i>)</li> </ul>	<p><b>Draft report:</b></p> <p>The section covers the issues required by the TOR satisfactorily. Consultant has been requested to look more critically at results monitoring than on reporting</p> <p><b>Final report:</b></p> <p>Distinction between reporting and monitoring has been clearly made. The analysis is detailed and relevant lessons learned and recommendations formulated around the importance of results based monitoring</p>	5	6
<p><b>H. Sustainability</b></p> <p>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"> <li>• Socio-political Sustainability</li> <li>• Financial Sustainability</li> <li>• Institutional Sustainability (<i>including issues of partnerships</i>)</li> </ul>	<p><b>Draft report:</b></p> <p>All the sub-criteria have been adequately assessed. Assessment is consistent with findings in related criteria. Some amendments have been suggested in the rationale for ratings given since the ratings are not very consistent with the findings.</p> <p><b>Final report:</b></p> <p>Some improvement on the rationalizing of ratings has</p>	5	5

	been noted in the final draft		
<b>I. Factors Affecting Performance</b> To what extent, and how well, does the evaluation report cover the following cross-cutting themes: <ul style="list-style-type: none"> <li>• Preparation and readiness</li> <li>• Quality of project management and supervision<sup>30</sup></li> <li>• Stakeholder participation and co-operation</li> <li>• Responsiveness to human rights and gender equity</li> <li>• Country ownership and driven-ness</li> <li>• Communication and public awareness</li> </ul>	<b>Draft Report:</b> All the required factors affecting performance have been covered in the report in a satisfactory manner.  <b>Final report:</b> No further comment	5	5
<b>VI. Conclusions and Recommendations</b>  <b>i. Quality of the conclusions:</b> 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.	<b>Draft report:</b> Conclusions section is well drafted and focusses on the main highlights to avoid duplication  <b>Final report:</b> The conclusions will highlight the main strengths and weaknesses of the project, and connect them in a compelling story line	5	5
<b>ii) Quality and utility of the lessons:</b> 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.	<b>Draft report:</b> The lessons are based on actual findings and are derived from both positive and negative experiences. Their formulation is not robust in some cases i.e. not formulated in a way that would make them applicable to other contexts  <b>Final report:</b> Requested changes have been made	4.5	5
<b>iii) Quality and utility of the recommendations:</b>  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	<b>Draft report:</b> Recommendations are anchored on findings and indicate who they are directed at. Suggestions have been made to make them more "actionable by clearly identifying: who the action is directed at, when (what timeline) it should be done and with what intention	4.5	5

<sup>30</sup> 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.

with the recommendations.	Final report: Improvements noted in the final report		
<b>VII. Report Structure and Presentation Quality</b>			
i) <b>Structure and completeness of the report:</b> To what extent does the report follow the Evaluation Office guidelines? Are all requested Annexes included and complete?	Draft report: Report structure is complete and adheres to TOR guidelines  Final report: No further comment	6	6
ii) <b>Quality of writing and formatting:</b> 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?	Draft report: The report is generally well written and easy to comprehend. It follows the guidelines given in the TOR. The tone is professional. Formatting is problematic  Final report: Same comments as above and formatting significantly improved in the final report	5	6
<b>OVERALL REPORT QUALITY RATING</b>		<b>S</b>	<b>S</b>

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.