

**Terminal Evaluation of the UNEP/GEF Project  
“Implementation of National Biosafety  
Framework for Lesotho”  
GEF ID # 3646  
(2011-2018)**

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**Evaluation Office of  
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This Terminal Evaluation was prepared for UNEP by Mr Camillo Risoli, as an independent consultant.

The evaluator would like to express their gratitude to all persons met and who contributed to this evaluation, as listed in Annex 3.

The evaluation team would like to thank the project team and in particular Mr Stanley Damane, Project Director, Mr Maboi Mahula, Project Coordinator, and UNEP Task Manager, Mr Alex Owusu-Biney for their contribution and collaboration throughout the Evaluation process. Sincere appreciation is also expressed to the Department of Environment of Lesotho.

The evaluation consultant hopes that the findings, conclusions and recommendations will contribute to the continuous improvement of similar projects in Lesotho and other countries and regions.

## BRIEF CONSULTANT BIOGRAPHY

Mr Camillo Risoli is a senior Monitoring & Evaluation Consultant with extensive experience in the coordination, management and evaluation of cooperation projects in the area of Capacity / Institution Building for Rural Development and Environmental Management. He has been Lead Evaluator of several GEF/UNEP Projects of Development and Implementation of National Biosafety Frameworks in more than 20 countries, as well as the Biosafety Regional Framework implementation in the Caribbean and the Final Evaluation of the Global GEF/UNEP Programme (123 countries). (Annex 8)

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## ABOUT THE EVALUATION

**Joint Evaluation:** No

**Report Language(s):** English.

**Evaluation Type:** Terminal Evaluation

**Brief Description:** This report is a Terminal Evaluation of a UNEP/GEF project implemented between 2011 and 2018. The project's overall development goal was "to make the National Biosafety Framework fully operational for the benefit of the people and environment of Lesotho consistent with the provisions of the Cartagena Protocol on Biosafety". The evaluation sought to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UNEP, and the relevant agencies of the project participating countries.

**Key words:** Biosafety, Genetically Modified Organisms (GMOs), Department of Environment (DoE) of Lesotho, Cartagena Protocol on Biosafety (CPB), Competent National Authority (CNA), Regulatory regime, Administrative System, Risk Assessment and Management, Awareness and Participation, Socio-political and Institutional Sustainability, Project Evaluation, GEF.<sup>1</sup>

**Primary data collection period:** April-June 2020

**Field mission dates:** na

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

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## LIST OF ACRONYMS

ANUBIS	A New UNEP Biosafety Information System
BCH	Biosafety Clearing House
CBD	Convention on Biological Diversity
CPB	Cartagena Protocol on Biosafety
DoE	Department of Environment
GEF	Global Environment Facility
GMO	Genetically Modified Organism
LMO	Living Modified Organism
MTEC	Ministry of Tourism, Environment and Culture
NBF	National Biosafety Framework
NBSAP	National Biodiversity Strategy and Action Plan
NEA	National Executing Agency
NEPAD	New Partnership for Africa Development (of African Union)
NGO	Non-Governmental Organisation
PoW	Programme of Work
ProDoc	Project Document
SADC	Southern Africa Community Development
ToC	Theory of Change
ToR	Terms of Reference
UNEP	UN Environment Programme

## PROJECT IDENTIFICATION TABLE

**Table 1: Project Identification Table**

<b>GEF Project ID:</b>	3646		
<b>Implementing Agency:</b>	UN Environment Programme	<b>Executing Agency:</b>	Ministry of Tourism, Environment and Culture - Department of Environment
<b>Relevant SDG(s) and indicator(s):</b>			
<b>Sub-programme:</b>	Environmental Governance	<b>Expected Accomplishment(s):</b>	<p><b>MTS 2010-2013 Expected Accomplishment (EA) (b):</b> Institutional capacities and policy and/or legal frameworks enhanced to achieve internationally agreed environmental goals</p> <p><b>MTS 2014-2017 EA2:</b> The capacity of countries to develop and enforce laws and strengthen institutions to achieve internationally agreed environmental objectives and goals and comply with related obligations is enhanced.</p>
<b>UNEP approval date:</b>	14/07/2011	<b>Programme of Work Output(s):</b>	
<b>GEF approval date:</b>	March 2011	<b>Project type:</b>	Medium-size Project
<b>GEF Operational Programme #:</b>	GEF 4	<b>Focal Area(s):</b>	Biodiversity
		<b>GEF Strategic Priority:</b>	SP 6 – SO3 Biosafety (Implement Cartagena Protocol)

			on Biosafety)	
<b>Expected start date:</b>	14/07/2011	<b>Actual start date:</b>	19/09/2011	
<b>Planned completion date:</b>	13/07/2015	<b>Actual operational completion date:</b>	13/07/2018	
<b>Planned project budget at approval:</b>	USD 1,702,145	<b>Actual total expenditures reported as of 20/12/2018:</b>	USD 1,702,145	
<b>GEF grant allocation:</b>	USD 884,806	<b>GEF grant expenditures reported as of 20/12/2018:</b>	USD 884,806	
<b>Project Preparation Grant - GEF financing:</b>	N/A	<b>Project Preparation Grant - co-financing:</b>	N/A	
<b>Expected Medium-Size Project co-financing:</b>	USD 817,339	<b>Secured Medium-Size Project co-financing:</b>	USD 817,339	
<b>First disbursement:</b>	<b>15/09/2011</b>	<b>Planned date of financial closure:</b>	<b>Not closed (pending last auditing)</b>	
<b>No. of formal project revisions:</b>	<b>8</b>	<b>Date of last approved project revision:</b>	<b>19/03/2018</b>	
<b>No. of Steering Committee meetings:</b>	<b>6 (documented in ANUBIS)</b>	<b>Date of last/next Steering Committee meeting:</b>	Last: June 2018	Next:
<b>Mid-term Review/ Evaluation (planned date):</b>	<b>March 2013</b>	<b>Mid-term Review/ Evaluation (actual date):</b>	<b>July 2013</b>	
<b>Terminal Evaluation (planned date):</b>		<b>Terminal Evaluation (actual date):</b>	March 2020	
<b>Coverage - Country(ies):</b>	<b>Lesotho</b>	<b>Coverage - Region(s):</b>	<b>Africa</b>	
<b>Dates of previous project phases:</b>	GEF/UNEP Project "Development of the National Biosafety Framework" (2003-2005)	<b>Status of future project phases:</b>	N/A	



## EXECUTIVE SUMMARY

### Project background

1. This is the final report of the Project "Implementation of National Biosafety Framework for Lesotho" (GFL/2328-2716-4C07) that was approved in July 2011 and started in September 2011 for a duration of 4 years (2011-2015). The total budget of the Project was USD 1,702,145, the 52% of which represents the GEF allocation (USD 884,806), and the remaining 48% (USD 817,339) was provided in kind by the Government of Lesotho. The Project has been granted three subsequent no-cost extensions of one year each, shifting its Official End date to 13/07/2018.
2. The project is a Medium Size Project (MSP) financed through GEF-4 mechanism and belongs to GEF Biodiversity Focal Area. It is relevant to GEF Strategic Programme 6, Biodiversity (BD-SP6) and Strategic Objective 3 (SO3): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety. The Project makes part of UNEP Biennial Programme of Work (Medium Term Strategy 2010-2013 and 2014-2017).
3. The Project Document recognised that in Lesotho the level of knowledge and practices related to the use of modern biotechnology tools and biosafety practices was quite low when the Project was drafted. More specifically, the regulatory and institutional capacity to implement the National Biosafety Framework was limited, awareness and institutional coordination among key national agencies was low, and the level of human resources and infrastructure for biosafety management was insufficient, which were considered the main issues to be tackled and improved through the Project.
4. The Project Objective as formulated in the Project Document was "to develop a workable and transparent National Biosafety Framework, in line with its national development priorities and the obligations to the Cartagena Protocol on Biosafety". The Project was actually expected to support the country to prepare, adopt and make operational a combination of policy, legal, administrative and technical instruments to manage the safe transfer, handling and use of Genetically Modified Organisms (GMOs) from modern biotechnology. This is a relevant issue for Lesotho, which shares all boundaries with South Africa that already has a biosafety regulatory framework and is producing GMO crops, on which (specifically maize) Lesotho relies to achieve its food security.

### This evaluation

5. The Evaluation took place in the period between March 2020 to January 2021 and could not include a mission to Lesotho as originally foreseen, due to the on-going pandemic situation. Consequently, skype meetings and written interviews were the main tools used to collect and share information and opinions. The Evaluation Team consisted of one consultant specialist of projects evaluation in the environmental sector working under the methodological guidance of the Evaluation Office of UN Environment.

### Key findings

6. The National Executing Agency of the Project was the Department of Environment (DoE) of the Ministry of Tourism, Environment and Culture, which is also Competent National Authority for the Cartagena Protocol on Biosafety and hosts the Biosafety Clearing House. The Project also established a National Coordinating Committee (NCC) to advise and guide the implementation of the National Biosafety Framework, which included representations of all government agencies with mandates relevant to the Cartagena Protocol on Biosafety (Ministry of Agriculture and Food Security, Min. of Health, Min. of Science and Technology, Min. of Trade), as well as representatives from the University and NGOs.

7. The Project was implemented during a difficult period of country's socio-political life. Particularly from 2014 onward, Lesotho has, in fact, experienced complex and tense political instability that has heavily reflected into the institutional framework. The Parliament has been dismissed twice and also Ministries and Principal Secretaries have abruptly changed more than once, including the Ministry of Tourism, Environment and Culture. All procurement tenders have been blocked for 10 months by the Government with a "blanket suspension" of tenders in December 2015, which has impacted very negatively on the establishment of the laboratory and the implementation of some planned activities to be executed through consultancies (postponed from 2015 to 2017).
8. Despite the low baseline situation and the unfavourable external conditions, the Project has developed a number of significant activities and delivered relevant outputs. The Biosafety Bill (2018) has been drafted, guidelines for risk assessment, risk management, monitoring and enforcement have been developed, as well as a manual for handling requests. Laboratory equipment for Living Modified Organisms (LMOs) testing have been procured and are currently stocked at the University of Lesotho. Additionally, the Project developed a broad National Biotechnology and Biosafety Awareness Strategy 2012 – 2017 and carried out outreach programmes in the form of workshops, awareness materials, newspaper, radio and TV programmes, and mainstreaming into educational curriculum.
9. Overall, Project Financial Management and Project Monitoring and Reporting have been satisfactorily implemented. However, the Project has not been time-efficient due to a very slow start and a low rate of delivery until the planned termination date (2015). This was due to concomitant factors, such as the political and institutional instability, changes in the leadership of the National Executing Agency (Ministry of Tourism, Environment and Culture) and in the Department of Environment, limited Human Resources in the Department and a certain bureaucratic inertia within and outside the National Executing Agency / Competent National Authority. The Project Design was, in retrospect, also quite overambitious and unrealistic.
10. The excessively low rate of activities implementation until 2015 asked for three subsequent no-cost extension for a total of 36 months, i.e. an increment of 75% of the planned time duration of the Project. Around 70% of the Project Budget was spent in the last two years (2017-18), during the extension period, whereas, at the planned end date (2015), only 24% of the budget had been spent.
11. As for the institutional changes and systemic effects (Outcomes) resulting in a fully operational National Biosafety Framework (Project Objective), they have not been substantially achieved. The situation of political and institutional instability of the country in recent years, coupled with lengthy procedures for laws discussion and approval, have strongly affected the smooth progression towards the approval and enactment of the Biosafety Bill. As a result, no "Regulatory regime in place, published and applied" was achieved (Outcome 2).
12. In absence of a regulatory framework, subsequent Outcomes 3, 4 and 5 (Biosafety Administrative procedures, Monitoring and Enforcement mechanisms, and forms of Public Participation were not put in place and implemented, as well. As for the mainstreaming of Biosafety in the main national strategies and plans (Outcome 1), the National Report (2020) to the Secretariat of the Convention on Biological Diversity (SCBD) has recognised that "Biosafety Policy should be reviewed to reflect the reality of resources and capacity constraints and the fact that Lesotho is surrounded by a country that has embraced use of GMOs for a while now".
13. The relevant assumptions outlined in the Theory of Change and visualised in Diagram 1 still stand mostly unfulfilled. Specialised Human Resources in the area of Biotechnology and Biosafety are not available at the suitable level within the Competent National

Authority (Department of Environment) and among other relevant Biosafety stakeholders, and the Department does not seem sufficiently empowered to play a leading and coordinating role in the implementation of the National Biosafety Framework. The socio-political environment, too, has not been overall conducive to put forward Biosafety agenda in the country and there is the need of further efforts to make Biosafety progressing in the national agenda.

14. As a matter of fact, Project Activities and Outputs delivery essentially occurred thanks to the championing role of few people of the Department of Environment, supported by UNEP through the assiduous back-stopping of the Task Manager and the technical assistance of regional consultants mobilised by the Project under the guidance of UNEP. The institutional uptake from the relevant ministries and the overall national ownership of the implementation process of the Biosafety Framework remained insufficient.

## Conclusions

15. The evaluation has concluded that the Policy, Regulatory and Administrative systems did not satisfactorily progress despite the support of the Project and a "workable and transparent National Biosafety Framework" is not yet operational, as initially foreseen. There is, therefore, the need for a more comprehensive, in-country analysis at Ministerial and Governmental level about the priority to be given to Biosafety and to the fulfilment of Cartagena Protocol requirements. The dimension and the geographical location of the country call for a regional approach and integration of the National Biosafety Framework of Lesotho within the Southern Africa institutional context and the regional mechanisms of partnership and cooperation.
16. Based on the findings from this evaluation, the project demonstrates performance at the 'Moderately Satisfactory' level. A table of ratings against all evaluation criteria is found in the Conclusions section of the Report.
17. The ToR of the Evaluation had identified two key strategic questions to be answered by the Evaluation. Answers to these questions are fully reported in Chapter VI (Conclusions) and summarised here below:

**(a)** To what extent did the project help to enhance national institutional and technical capacity and awareness amongst the key actors for effective enforcement of the Biosafety Law, decrees and sub-decrees on biosafety?

The Project has implemented several Activities and made available relevant Outputs for enhancing national institutional and technical capacities to implement the National Biosafety Framework (NBF) in Lesotho, including a Biosafety Law and subsequent Administrative and Enforcement Systems. The political commitment and responsiveness of the country, however, has been much lower than expected. Regulatory tools have not yet been adopted and inter-institutional mechanisms are not operational for further promoting and steering the NBF. Overall, the role and the capacities of the Competent National Authority (Department of Environment) have not been sufficiently strengthened to enable the institutional up-take and sustainability of Project activities and results.

**(b)** To what extent are the outcome indicators verifiable, and record progresses towards the achievement of the development objectives, as well as the obligations under the Cartagena Protocol?

The Project Document did not satisfactorily discuss the causal/logical sequence of activities and results, and the Project Results Framework also showed a certain misunderstanding and overlapping of concepts and components (outcomes, outputs, indicators, targets, etc.). The two main Terminal Documents prepared by the Project, i.e.

the Terminal Report and the Final Project Output Summary (formats provided by UNEP) basically refer to the delivery of Outputs and Activities.

### **Lessons Learned**

18. Lesson 1: A solid institutional framework and leadership are crucial to assert Biosafety as a priority issue for Sustainable Development.
19. Lesson 2: It is important to adapt project design and expected results to the baseline situation of the country, expressed needs and priorities, and to in-country real capacity of progressive national ownership and institutional up-take.
20. Lesson 3: The preparation, discussion and approval of a Biosafety Law may prove unrealistic to be achieved during the "normal" timeframe of a Project.

### **Recommendations**

21. Recommendation 1: The Evaluation recommends that UNEP Project staff communicate the following recommendation to the Department of Environment - to resume efforts to restore a Biosafety Coordinating Committee to draw a possible plan of action / road map including:
  - Assessing current priorities and identification of realistic objectives to improve country's fulfilment of Cartagena Protocol requirements, through the gradual implementation of the National Biosafety Framework (NBF);
  - Setting strong relationship with relevant Biosafety players (State and Non-state actors) in South Africa and other SADC (Southern Africa Development Community) countries and identify possible forms of joint initiatives in support of the implementation of the National Biosafety Framework (NBF) in Lesotho;
  - Design of a resources mobilization strategy at National, Regional and International level (NBSAP, SADC, NEPAD - New Partnership for Africa Development of the African Union, GEF/UN Environment, Bilateral Cooperation) to implement the NBF in Lesotho.

## I. INTRODUCTION

22. In its capacity as an Implementing Agency of the Global Environmental Facility (GEF), UNEP has been providing administrative and technical assistance to countries participating in the Cartagena Protocol on Biosafety (CPB) for the development and implementation of National Biosafety Frameworks (NBF). The frameworks are a combination of policy, legal, administrative and technical instruments enabling the countries to manage the safe transfer, handling and use of Living Modified Organisms from modern biotechnology<sup>2</sup>.
23. This is the final report of the Terminal Evaluation of the Project "Implementation of National Biosafety Framework for Lesotho" (GFL/2328-2716-4C07) that was approved in July 2011 and started in September 2011 for a duration of 4 years (2011-2015). The total budget of the Project was USD 1,702,145 the 52% of which represents the GEF allocation (USD 884,806), and the remaining 48% (USD 817,339) was provided in kind by the Government of Lesotho. The Project has been granted three subsequent no-cost extensions of one year each, shifting its Official End date to 13/07/2018.
24. The project is a Medium Size Project (MSP) financed through GEF-4 mechanism and belongs to GEF Biodiversity Focal Area. It is relevant to GEF Strategic Programme 6, Biodiversity (BD-SP6) and Strategic Objective 3 (SO3): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety. The Project makes part of UNEP Biennial Programme of Work (MTS 2010-2013 and MTS 2014-2017).
25. The National Executing Agency of the Project was the Department of Environment (DoE) of the Ministry of Tourism, Environment and Culture, which is also Competent National Authority for the Cartagena Protocol on Biosafety and hosts the Biosafety Clearing House.
26. The purpose of the Evaluation is outlined in next chapter II and its main intended audiences are the Project Team (Nat. Project Director and Project Coordinator), the Competent National Authority (Department of Environment) and relevant national stakeholders. The Evaluation took place in the period between March 2020 to January 2021 and could not include a mission to Lesotho as originally foreseen, due to the ongoing pandemic situation. Consequently, skype meetings and written interviews were the main tools used to collect and share information and opinions. Methodological limitations are discussed in next section II. The Evaluation Team consisted of one consultant specialist of projects evaluation in the environmental sector (See Annex 8) working under the methodological guidance of the Evaluation Office of UN Environment.

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<sup>2</sup> In this Report, the terms Living Modified Organism (LMO) and Genetically Modified Organism (GMO) are considered synonymous and indifferently used.

## II. EVALUATION METHODS

### Overall approach of the Evaluation

27. In line with the UNEP Evaluation Policy and Evaluation Manual, and following the Guidelines for GEF Agencies on Conducting Terminal Evaluations, the Terminal Evaluation has been undertaken upon 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 had two primary purposes:
  - (i) to provide evidence of results to meet accountability requirements, and
  - (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UN Environment, the GEF, the National Executing Agency and the national partners.
28. The report follows the format for Terminal Evaluations provided by the UNEP Evaluation Office. According to the UNEP evaluation methodology, most criteria have been rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability is rated from Highly Likely (HL) down to Highly Unlikely (HU). Ratings are provided at the end of the assessment of each evaluation criterion (Chapter V: Findings) and the complete ratings table is included under the Conclusions (Chapter VI).
29. As requested by the UNEP methodology for Terminal Evaluations, an Inception Report was produced at the beginning of the mission, containing a review of the project context, of the quality of project design, a draft reconstructed Theory of Change (ToC) of the project, the evaluation framework and a tentative evaluation schedule. The Inception Report underwent a Peer Review at the UNEP Evaluation Office and has been shared with the Biosafety Task Manager at UN Environment.
30. The Evaluation has fostered a participatory approach with key stakeholders at national level. The consultant, through the support of Biosafety Task Manager at UN Environment, has come to contact with the national Executing Agency and the Project Team and has shared with them some preliminary tools and questions to systematise and discuss main achievements.
31. The Consultant could not visit the country due the on-going COVID-19 pandemic. Written exchanges through emails and Skype meetings were extremely useful to discuss achievements, problems and perspectives with former Project Director and Project Coordinator, both staff of the National Executing Agency, i.e. the Department of Environment.
32. Throughout this evaluation process and in the compilation of the Final Evaluation Report, efforts have been made to represent the views of both mainstream and more marginalised groups. Data was collected with respect to ethics and human rights issues and Gender-disaggregated data were also examined.

### Methods and tools for data collection and analysis

33. Overall, the Terms of Reference (ToR) of the Evaluation and the methodological tools and formats provided by the UNEP Evaluation Office have proved to be a robust methodological framework for the Evaluation exercise, facilitating the systematisation and presentation of the evaluation findings.

34. The Inception phase of the Evaluation has permitted a preliminary approach to the Project and the delivery of the Inception Report, which laid the foundation for the main report in some essential aspects, by including:
- The thorough Review of the Project Design Quality (PDQ) that has highlighted strong and weak points of Project Design (see chapter V.B), particularly of the Logical Framework (Logframe);
  - The reconstruction of the Theory of Change (ToC) of the project at Inception. The ToC prepared in the Inception phase has been assessed in its coherence and consistency during the Evaluation. The final version of the ToC is discussed in chapter IV.
35. The main methods and tools used in the Evaluation can be summarised as follows:
- a) A Desk Review of all project documents and reports the consultant had access to (see Annex 4), particularly through the e-platform ANUBIS (A New UNEP Biosafety Information System), which has been most helpful to gather relevant information regarding the technical and financial performance of the Project;
  - b) Exchanges with the Project Management Team at UNEP, namely the Task Manager;
  - c) The document "Final Project Outputs" prepared by the Project Team at the end of the Project (posted in ANUBIS) was revised and discussed with the Project Coordinator. For the purpose, the Consultant prepared a matrix of Project Outputs integrated by consultant's questions and comments, which has been shared and discussed with the Project Team (National Project Director and National Project Coordinator);
  - d) Exchanges through emails and Skype with the Project Team (National Project Director and National Project Coordinator) took place during the evaluation to clarify specific points and to have a direct feedback on main issues. Unfortunately, the lack of a country visit (see next section, Limitations) has not permitted a direct and larger feedback from other stakeholders that, though contacted by email, did not react to the contact;
  - e) Preliminary Findings including proposed Recommendations were sent by email to the Project Team in Lesotho to receive feed-back before completing the Evaluation Report;
  - f) Exchanges with the Evaluation Manager of UNEP Evaluation Office and with the UNEP Task Manager / Biosafety have been constant and most useful to clarify issues of methodological and technical nature regarding the evaluation development and the project implementation.

### **Limitations**

36. Due to the travel restrictions associated with the COVID-19 pandemic as well as budget and time limitations, stakeholder consultations were exclusively in the form of distance consultation. Not being able to visit the country has been a limiting factor that has deprived the evaluation of a direct and intensive exchange with the Project Team and possibly with some National Stakeholders. The Project Team in Lesotho (Former Project Director and Project Coordinator) still work at the Department of Environment, yet with other assignments and priorities, beside Biosafety.
37. The Evaluation took place two years after the closure of the Project (July 2018), which has probably influenced the availability of other stakeholders in participating to the evaluation exercise. Written feedback from the various members of the National

Coordinating Committee established by the Executing Agency (see chapter III below) was very limited (only one feedback). Most of them, according to the former Project Director, may have possibly changed job, considering the staff turnover in public institutions and the time elapsed since the Project terminated (last meeting of the Committee was in June 2018).

38. The situation of the pandemic in the country may also have caused communication problems, since many people were not working at office and with problems of access to internet at home. The same also applied to the former Project Coordinator that, because of the pandemic, was only present part-time at his Office during the starting period of the evaluation exercise. The lack of a country-visit has also made impossible the contact with some civil society groups that could not be contacted through skype or emails, such as Farmers, Consumers, Women Groups.
39. All the limitations above have been minimised thanks to the large and well compiled documentation available through the platform ANUBIS.



### III. THE PROJECT

#### A. Context

40. Lesotho ratified the Cartagena Protocol on Biosafety (CPB) in 2003 and developed its National Biosafety Framework (NBF) with the support of the UNEP-GEF Project "Development of National Biosafety Framework" (2003-2005). Several preliminary activities were carried out, including surveys and databases on biotechnologies and biosafety, information and awareness campaigns, capacity building for various target groups (policy makers, teachers and researchers, lawyers, technicians, students and consumers, among others) and a biosafety website.
41. Nevertheless, the Project Document recognised that in Lesotho the level of knowledge and practices related to the use of modern biotechnology tools and biosafety practices was quite low when the Project was drafted. More specifically, the regulatory and institutional capacity to implement the NBF was limited, posing a serious threat to the country's efforts to meet its obligations to the Cartagena Protocol. Lack of awareness among key agencies, poor institutional coordination, lack of human resources and infrastructure for biosafety management were considered main issues to be tackled and improved through the Project "Implementation of National Biosafety Framework for Lesotho" currently under evaluation.
42. As rightly expressed in the Project Document, the implementation of the NBF in Lesotho was designed to prepare, adopt and make operational a combination of policy, legal, administrative and technical instruments enabling the country to manage the safe transfer, handling and use of Genetically Modified Organisms (GMOs) from modern biotechnology. This is particularly relevant in the case of Lesotho, which shares all its boundaries with South Africa, a country that already has a biosafety regulatory framework and is producing GMO crops (specifically maize), on which Lesotho relies to achieve its food security. It is, therefore, important that Lesotho can ensure the safe transboundary movement of LMOs from its only neighbouring country. This issue is also discussed in chapter V (Section: Relevance to national and regional priorities).
43. The high level of rural poverty, food insecurity and vulnerability to external conditions, particularly recent years of drought, coupled with one of the highest prevalence of HIV-AIDS in the world, represent the background picture of problems and needs that Lesotho has to face and solve, as a pressing priority to achieve a sustainable and inclusive development process. As a consequence, Biotechnology and Biosafety are developing in Lesotho within an overall challenging context.

#### B. Results framework

44. The Project Objective as formulated in the Project Document (ProDoc) is "to develop a workable and transparent National Biosafety Framework, in line with its national development priorities and the obligations to the Cartagena Protocol on Biosafety". The Project has been designed to address the five main components of a National Biosafety Framework<sup>3</sup> and to achieve five main Outcomes, summarised as follows:

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<sup>3</sup> As originally designed in UNEP-GEF, 2005, Toolkits for the Development of National Biosafety Frameworks

**Table 1: Components, Outcomes and main Outputs of the Project (according to revised Results Framework in ToR)**

<b>COMPONENT 1 To assist the Government of Lesotho to integrate Biosafety and Biotechnology into its national development plans.</b>	
Outcomes	<p>1.1. Biotechnology and biosafety recognized as a sustainable development issue in PRS, NBSAP, NEAP, Biotechnology and Biosafety Strategies and Action Plans.</p> <p>1.2. Enabling mechanisms to adapt policies to changing needs prepared</p>
Outputs	<ul style="list-style-type: none"> <li>➤ Stocktaking and inventory report</li> <li>➤ Policy document on biosafety issues, relevance and mainstreaming approaches into relevant national plans and programmes</li> </ul>
<b>COMPONENT 2: To establish a fully functional and responsive regulatory regime in line with CP and national needs on biosafety</b>	
Outcomes	<p>2.1 Regulatory regime that is consistent with CP and other domestic and international obligations in place.</p> <p>2.2. Application and enforcement of the regulatory regime</p>
Outputs	<ul style="list-style-type: none"> <li>➤ Biosafety Bill promulgated as an Act of Parliament</li> <li>➤ Revocation and cessation orders published</li> </ul>
<b>COMPONENT 3: To have a fully functional national system for handling requests and applications</b>	
Outcomes	<p>3.1. Establishment of a fully functional and workable system for handling applications, risk assessment and management, and decision making</p> <p>3.2. A fully functional administrative system established</p>
Outputs	<ul style="list-style-type: none"> <li>➤ Set of procedures for handling requests including permit and application forms developed</li> <li>➤ Risk Assessment guidelines made operational with "check lists" developed for applicants and reviewers</li> <li>➤ Two national workshops held on Risk Assessment/management and decision makers for the NBA, related agencies and applicants</li> </ul>
<b>COMPONENT 4: To set up a system for monitoring environmental effects and enforcement mechanisms for biosafety in Lesotho</b>	
Outcomes	<p>4.1. Mechanism for monitoring environmental effects and enforcement mechanisms developed</p>
Outputs	<ul style="list-style-type: none"> <li>➤ Institutional roles and responsibilities for the proposed monitoring and enforcement system established through Memorandum of Understanding (MOUs)</li> <li>➤ Methodologies for monitoring the environmental effects/ risks associated with LMOs handling, transport, use, transfer and release developed</li> <li>➤ 3 workshops on monitoring and enforcement, and 2 Courses on LMO Detection held.</li> <li>➤ Laboratory facilities developed and utilised for LMOs detection by the National Biosafety Authority, Research Institutions, Universities, Regulatory Agencies and other relevant stakeholders identified.</li> <li>➤ 10 – 20 Technicians from relevant ministries, departments and agencies trained and enabled to carry out laboratory inspection activities.</li> <li>➤ Inspection and emergency procedure manuals developed in collaboration with countries in the region for cooperative initiatives.</li> </ul>

<b>COMPONENT 5: To establish fully functional systems for Public awareness and education, Public participation in decision-making and Access to information</b>	
Outcomes	5.1 Strengthened system for public awareness and education 5.2 Regulatory regime published and made accessible to all stakeholders 5.3 A functional national system for access and sharing of information. 5.4 Strengthened public participation to facilitate decision-making
Outputs	Public Communication Strategy developed <ul style="list-style-type: none"> <li>➤ Coalition of advocacy groups established</li> <li>➤ Different stakeholders, including media and the public, trained on public information and participation related issues.</li> <li>➤ An interactive biosafety database established, accessible to the public and linked to the National Biosafety Clearing House (nBCH)</li> <li>➤ Clearly defined entry points for public participation in decision-making process for LMOs.</li> </ul>

### C. Stakeholders

45. The Department of Environment (DoE) of the Ministry of Tourism, Environment and Culture (MTEC) is the key-stakeholder for Biosafety Framework implementation in Lesotho. The DoE is the Competent National Authority (CNA) for the Convention on Biodiversity (CBD), for the Cartagena Protocol (CPB) and is also the focal point for the Biosafety Clearing House (BCH). DoE was also the National Executing Agency of the Project. Its role can be summarised as follows:

**Table 2: Role and responsibility of the Department of Environment (DoE) of the Ministry of Tourism, Environment and Culture**

<b>Role, interest and power over project results/implementation</b>	<b>Overall institutional role and responsibilities</b>	<b>Expected changes through project implementation</b>
<ul style="list-style-type: none"> <li>• Executing Agency of the Project</li> <li>• Manage the project and ensure that its objectives are met through the Project Director in DoE;</li> <li>• Responsible for reporting to UNEP</li> <li>• Developed the National Biosafety Framework (NBF) of Lesotho through the previous GEF/UNEP Project</li> </ul>	<ul style="list-style-type: none"> <li>• Lead agency for environmental management</li> <li>• Promotes socio-economic and environmentally sustainable development</li> <li>• Competent National Authority (CNA) for the CPB</li> </ul>	<ul style="list-style-type: none"> <li>• Overall institutional strengthening</li> <li>• To be further empowered (institutionally and technically) and fully operational for playing its key-role of overall coordination and management of Biosafety in the country</li> <li>• Full institutional uptake of the results of the Project</li> </ul>

46. Due to the multi-sectorial nature of Biosafety, different Ministries were expected to be involved, at a variable extent, throughout the implementation of the NBF. Some of them are foreseen in the proposed drafted law (Biosafety Bill 2018) as core members of the envisaged National Biosafety Council, namely the Ministry of Agriculture and Food Security, the Min. of Health, the Min. of Science and Technology, and the Min. of Trade. The National Biosafety Clearing House (BCH) and the drafted Biosafety Policy also indicate the Min. of Agriculture as a Competent Authority. Representatives of the

Academic sector and of Civil Society were also expected to be present in the National Biosafety Council. Parliamentarians and the Cabinet were also considered relevant stakeholders in the process of enactment of the biosafety regulatory regime and biosafety policy.

47. Whereas the National Biosafety Council has not been formally put in place due to the missing approval and enactment of the Biosafety Bill (see chapter V, Section D, Availability of Outputs for Outcome 2), all the Ministries and Institutions mentioned above have been part of the National Coordinating Committee promoted by the Project (see next Section D).

#### D. Project implementation structure and partners

48. The Department of Environment (DoE), in its role as National Executing Agency (NEA) of the Project, established a National Coordinating Committee (NCC) to advise and guide the implementation of the National Biosafety Framework. The Committee included representations of all government agencies with mandates relevant to the Cartagena Protocol on Biosafety, as well as representatives from the National University of Lesotho and NGOs.
49. The DoE has also appointed a Project Director responsible for the overall co-ordination, management and supervision of all aspects of the National Project, responding to the Committee and to UNEP. A Project Coordinator (former Project Assistant) was also in charge of the daily management of the Project, under the supervision of the Project Director. Both the Project Director and the Project Coordinator were (and are) staff of the Department (DoE).
50. The overall structure of implementation of the Project, as designed in the ProDoc, is visualised below:

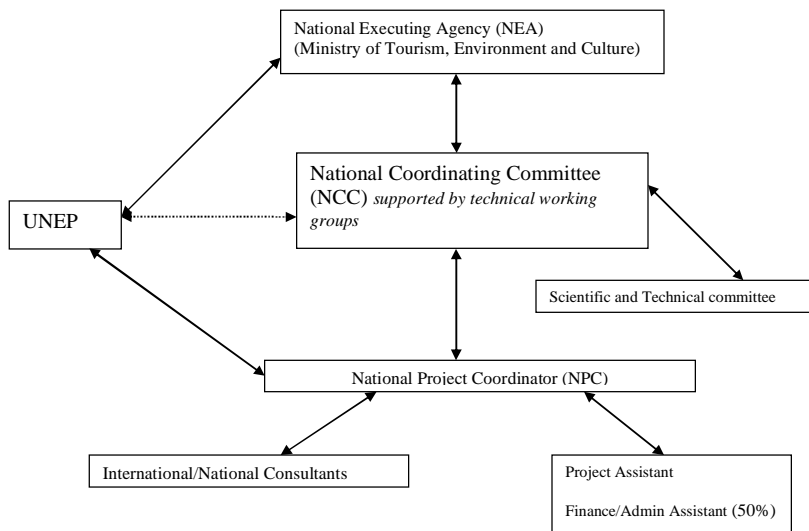


Figure 1: Organigram of the Project with project key stakeholders

51. The list of the members of the National Coordination Committee shows that in total (in different periods) 28 persons participated in the activities of the Committee, being 12 from the Ministry of Environment, 5 of the Min. of Agriculture, 2 of the Min. of Health, 2 from Min. of Trade, 1 from Min. of Science and Technology, 3 from NGOs and 3 from the University.

52. The first meeting of the National Coordinating Committee was held in November 2011 and the last one in June 2018, with two meetings held in 2012, one in 2014 and two in 2016.

### E. Changes in design during implementation

53. During its lifetime, the Project has been granted 8 budget revisions (according to ANUBIS files), which have been mainly used for re-allocating unspent money and do not have substantially changed the project design. The Project was also granted three no-cost extensions (total of 36 months of extension over an initial planned timeframe of 48 months) due to delays in project implementation (see chapter V, Section C). This increment represents a 75% additional period of execution, which can be considered a significant change of the Project Design.

### F. Project financing

**Table 3: GEF Budget at design and expenditures by Budget Line / Object of Expenditure (12/2018)**

UNEP BUDGET LINE / OBJECT OF EXPENDITURE	Estimated cost at design (USD)	Actual Cost (USD)	Expenditure ratio (actual/planned)
10 PROJECT PERSONNEL	296,070.00	250,463.30	
20 SUB-CONTRACT	0.00	3,145.55	
30 TRAINING	330,329.00	310,673.29	
40 EQUIPMENT & PREMISES	205,119.00	210,867.22	
50 MISCELLANEOUS	53,288.00	109,656.64	
<b>Total</b>	<b>884,806.00</b>	<b>884,806.00</b>	<b>100%</b>

**Table 4: Co-financing Table (Source: Project Terminal Report)**

Co-financing (Type/Source)	UNEP own Financing		Government USD		Other * USD		Total USD		Total Disbursed USD
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
Grants									
Loans									
Credits									
Equity investments									
In-kind support			817,000	817,000			817,000	817,000	817,000
Other *									
<b>Total</b>			<b>817,000</b>	<b>817,000</b>			<b>817,000</b>	<b>817,000</b>	<b>817,000</b>

\* This refers to contributions mobilized for the project from other multilateral agencies, bilateral development cooperation

#### IV. THEORY OF CHANGE AT EVALUATION

##### The reconstructed Theory of Change (ToC) of the project: overview

54. The reconstructed Theory of Change (ToC), based on projects design and logical framework, aims at mapping the possible pathways of change between the project outputs to the expected outcomes, up to the intended impact, as well as the main drivers and assumptions that have a bearing on the envisaged change.
55. At the time of Project formulation, it was not requested to present the Theory of Change (ToC) of the intervention. Moreover, the format in use for the Project Results Framework (Logical Framework, App. 4 of the ProDoc) only contemplated results at Outcome level. Outputs were defined in the App. 6 of the ProDoc (Key deliverables and benchmarks).
56. According to the analysis of the Project Design (see Chapter 5, Section B), the Project Document did not fully succeed in providing a clear and exhaustive description of its expected results at different levels, and the logical sequence between Activities, Outputs and Outcomes was not discussed. In light of that, and taking into account UNEP's definitions of different results levels, Project results have been partially reformulated or rephrased in the reconstructed Theory of Change (ToC), which is discussed in the following sections 4.2 and 4.3 and visualised in Diagrams 1 and 2.
57. Table 5 below compares the project's results as stated in the Project Documents and as formulated in the Theory of Change (ToC) at Evaluation. It also explains in the third column the rationale for reformulation. Most relevant changes refer to the definition of the Project Impact (not mentioned in the ProDoc) and of the Intermediate States between Outcome and Impact, as also visualised in Diagram 2. Outcome and Outputs have been streamlined without substantive changes.

**Table 5: Justification for Reformulation of Results Statements**

Formulation in original project document(s)	Formulation for Reconstructed ToC at Evaluation	Justification for Reformulation
<b>LONG TERM IMPACT</b>		
Not discussed	Enhanced conservation and sustainable use of biological diversity in Lesotho.	The Project Impact is the Global Environmental Benefit the Project is contributing to.
<b>INTERMEDIATE STATES (IS)</b>		

Formulation in original project document(s)	Formulation for Reconstructed ToC at Evaluation	Justification for Reformulation
<p><b>Project Goal</b> (as in ProDoc): "To make the National Biosafety Framework fully operational for the benefit of the people and environment of Lesotho consistent with the provisions of the Cartagena Protocol on Biosafety"</p> <p><b>Project Objective</b> (as in ProDoc) : "To develop a workable and transparent National Biosafety Framework, in line with its national development priorities and the obligations to the Cartagena Protocol on Biosafety"</p> <p><b>Specific Objectives:</b> (as in ProDoc)</p> <ol style="list-style-type: none"> <li>1) To assist the Government of Lesotho to integrate Biosafety and Biotechnology into its' national development plans.</li> <li>2) To establish a fully functional and responsive regulatory regime in line with CP and national needs on biosafety</li> <li>3) To have a fully functional national system for handling requests and applications.</li> <li>4) To set up a system for monitoring environmental effects and enforcement mechanisms for biosafety in Lesotho</li> <li>5) To establish fully functional systems for: Public awareness and education; Public participation in decision-making; access to information</li> </ol>	<p><b>Intermediate State 4 (IS 4):</b> Art. 1 of Cartagena Protocol fulfilled: Safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements</p> <p><b>Intermediate State 3 (IS 3):</b> Improved governance of national / regional biosafety systems based upon: Rule of law and compliance, Accountability and Liability, Equity, Transparency, Citizens' Participation</p> <p><b>Intermediate State 2 (IS 2):</b> Improved Decision-making, Effective mechanisms, Enhanced quality information and transparency</p> <p><b>Intermediate State 1 (IS 1):</b> A workable and transparent National Biosafety Framework operational in Lesotho</p>	<p>Project Goal and Project Objective are nearly the same in the ProDoc and are focused on making operational the National Biosafety Framework (NBF), which is actually the first step after the achievement of the five Project Outcomes. (Intermediate State 1).</p> <p>The pathway from the NBF to Impact is not discussed in the ProDoc.</p> <p>Intermediate States have been made explicit in the ToC between Outcomes and Impact</p> <p>The Specific Objectives are defined as Project Outcomes in App. 4 (Logical Framework). (see below)</p>
<b>PROJECT OUTCOMES</b>		
<p>1.1. Biotechnology and biosafety recognized as a sustainable development issue in PRS, NBSAP, NEAP and Biotechnology and Biosafety Strategies and Action Plans.</p> <p>1.2. Enabling mechanisms to adapt policies to changing needs prepared</p>	<p>1. Biotechnology and biosafety mainstreamed as a sustainable development issue in main national development strategies and plans (e.g. PRS, NBSAP, NEAP)</p>	<p>Outcome 1.1 has been made more explicit taking into account its indicators in the Results Framework. It becomes Outcome 1.</p> <p>Outcome 1.2 is considered an operational/methodological step towards Outcome 1.</p>
<p>2.1 Regulatory regime that is consistent with CPB and other domestic and international obligations in place.</p> <p>2.2 Regulatory regime published and made accessible to all stakeholders</p> <p>2.3 Application and enforcement of the regulatory regime</p>	<p>2. Regulatory regime in place, published and applied</p>	<p>More synthetic reformulation (no substantive changes)</p>

<b>Formulation in original project document(s)</b>	<b>Formulation for Reconstructed ToC at Evaluation</b>	<b>Justification for Reformulation</b>
3.1. Establishment of a fully functional and workable system for handling applications, their consideration and decision making 3.2. A fully functional administrative system established. 3.3. Establishment of mechanisms for information exchange.	3. A workable system for handling applications, risk assessment and management, and decision making is fully functional.	More synthetic reformulation (no substantive changes)
4.1. Monitoring and enforcement mechanisms developed	4. Monitoring and enforcement mechanisms developed and in operation.	Outcome should express use or uptake. "In operation" has been added.
5.1 Strengthened system for public awareness and education. 5.2. A functional national system for access and sharing of information. 5.3 Strengthened public participation to facilitate decision-making.	5. Fully functioning Systems for public awareness and education, for access and sharing of information and for public participation in decision-making.	The three Outcomes have been assembled and "Fully functioning" has been added (see justification above)
<b>PROJECT OUTPUTS</b>		
<b>As formulated in App. 6 of the ProDoc (Key deliverables and Benchmarks)</b>	<b>Formulation for Reconstructed ToC at Evaluation</b>	<b>Justification for Reformulation</b>
- Stocktaking and inventory report - Policy document on biosafety issues, relevance and mainstreaming approaches into relevant national plans and programs	1.1 A stocktaking report developed "on status of modern Biotechnology and Biosafety". 1.2 Policy document prepared on biosafety issues, relevance and mainstreamed into relevant national plans and programmes	-The object of the Stocktaking has been included to specify its scope (as formulated in the Outcome Indicator, in the Results Framework).
- Biosafety Bill promulgated as an Act of Parliament - Biosafety regulations gazetted - Revocation and Cessation orders published	2.1 Biosafety Bill and Regulations prepared and reviewed for subsequent submission for approval	The promulgation of the Act by the Parliament and the Regulations do not seem realistic Project Outputs. They are contemplated as a Direct Outcome in the ToC (Diagram 1) The third Output (Revoc. & Cessation orders) is not described in any part of the ProDoc
-Set of procedures designed for handling requests including permit and application forms. -Risk Assessment guidelines made operational with "check lists" developed for applicants and reviewers. -Two of National workshops held on Risk Assessment/management for decision makers, the NBC, related agencies and applicants -Inventory List of designated Laboratory facilities and utilised for LMOs detection by the National Biosafety Authority, Research Institutions, Universities, Regulatory Agencies and other relevant stakeholders	3.1 Set of procedures designed for handling requests (permit and application forms, etc). 3.2 Risk Assessment guidelines made operational with "check lists" 3.3 Two National workshops held on Risk Assessment/management 3.4 Inventory List of designated Laboratory facilities developed and available at DoE for posterior selection and upgrading as GMO Lab	Just reformulated more synthetically without substantive changes.



Formulation in original project document(s)	Formulation for Reconstructed ToC at Evaluation	Justification for Reformulation
<ul style="list-style-type: none"> <li>- Institutional roles and responsibilities for the proposed monitoring and enforcement system established through Memorandum of Understanding (MOUs)</li> <li>- Methodologies for monitoring the environmental effects/ risks associated with LMOs handling, transport, use, transfer and release developed</li> <li>- Inspection and emergency procedure manuals developed in collaboration with countries in the region for cooperative initiatives</li> <li>- 3 workshops on monitoring and enforcement</li> <li>- 2 Courses on LMO Detection held.</li> <li>- 10 – 20 Technicians from relevant ministries, departments and agencies trained and enabled to carry out laboratory inspection activities.- Laboratory facilities developed and utilised for LMOs detection by the National Biosafety Authority, Research Institutions, Universities, Regulatory Agencies and other relevant stakeholders identified.</li> </ul>	<ul style="list-style-type: none"> <li>4.1 Institutional roles and responsibilities established through MOUs between DoE and relevant national stakeholders</li> <li>4.2 Methodologies of Mon. and Enforcement developed and made available to national regulatory agencies</li> <li>4.3 Inspection and emergency procedure manuals developed also through regional initiatives</li> <li>4.4 Three workshops on monitoring and enforcement held for Enforcement Officers and Inspectors (e.g. quarantine, customs, border inspectors, etc.)</li> <li>4.5 Two Courses on LMO Detection held.</li> <li>4.6 Ten-twenty Technicians trained to carry out laboratory inspection activities.</li> </ul>	<ul style="list-style-type: none"> <li>Reformulated to specify MoUs partners</li> <li>Reformulated to be more specific</li> <li>Target groups have been specified</li> </ul>
<ul style="list-style-type: none"> <li>- Public Communication Strategy Developed</li> <li>- Coalition of advocacy groups established</li> <li>- Different stakeholders groups, including media and the public, trained on public information and participation related issues.</li> <li>- An interactive biosafety database established, accessible to the public and linked to the National Biosafety Clearing House (nBCH)</li> <li>- Clearly defined entry points for public participation in decision-making process for LMOs</li> </ul>	<ul style="list-style-type: none"> <li>5.1 Public Communication Strategy developed and approved by stakeholders</li> <li>5.2 Different stakeholders groups, including media and the public, trained on public information and participation related issues.</li> <li>5.3 An interactive biosafety database established, accessible to the public and linked to the National Biosafety Clearing House (nBCH)</li> <li>5.4 Clearly defined entry points for public participation in decision-making process for LMOs</li> </ul>	<ul style="list-style-type: none"> <li>App. 6 specifies that the Strategy has to be approved by Stakeholders</li> <li>Advocacy issue was raised by GEF SEC, saying that "GEF does not finance advocacy groups"</li> </ul>

### The pathway towards the implementation of the National Biosafety Framework

58. Diagram 1 below maps out the lower part of the reconstructed Theory of Change, from Outputs to the implementation of the National Biosafety Framework. There are five logical pathways from Outputs towards the five Project Outcomes corresponding to each of the five components of the National Biosafety Framework (NBF).
59. The ToC shows that in some of the pathways there are intermediate steps (Direct Outcomes, see diagram 1) between Outputs and Project Outcomes, as in the case of the Regulatory Regime (Outcome 2), as explained in Table 5 above, under Output 2.1. The ToC also shows that there is an "if...then..." chain (cause-effect) between Outcomes 2, 3

- and 4: if a regulatory regime is in place, then an administrative system can be set and work, and if the administrative system works and decisions are made, then a monitoring and enforcement system makes sense and has to be made functional.
60. The project design looks very ambitious when considering the Biosafety baseline situation in the country. The key-driving force of the Project was basically represented by the process of national involvement started through the previous GEF-UNEP Project that enabled the country to have a "draft National Biosafety Framework for Lesotho" in 2005. The championing role of the small Biosafety Team in the Department of Environment and of UNEP were **key-drivers** of the process. Unfortunately, the expected leading role of the Department of Environment (DoE) and of the Ministry of Tourism, Environment and Culture (see chapter III, Section C) did not materialise, due to recurrent changes of leadership in the Department and serious governmental crises during the Project timeframe, as discussed in chapter V (Sections C and D).
61. Moving from a draft Framework to its full implementation requires a number of **assumptions** to hold in different areas of action:
- a) Human Resources have to be available and made operational at a suitable level, particularly within the Competent National Authority, but also in other sectors involved in Biosafety, such as Agriculture, Health, Trade, Justice, Science & Technology and Academic Institutions;
  - b) Full institutional up-take of the Competent National Authority, able to assume the leadership and play its coordinating role in Biosafety policy and decision-making through mechanisms of coordination and inter-sectorial work;
  - c) Enabling socio-political environment at a higher and wider level, i.e. policy and decision-makers willing to make Biosafety progressing in the national agenda, as well as public opinion and civil society able to meaningfully participate in the process.
62. Under the conditionality that the main assumptions listed above are at least partially upheld, the operationalisation of the National Biosafety Framework (NBF) is possible. In the Reconstructed Theory of Change, a "workable and transparent National Biosafety Framework is operational in Lesotho" is represented by the **first Intermediate State (IS 1)**, towards Project Impact, as discussed below.

### **The pathway to Impact**

63. As previously mentioned (see Table 5 above), the intended Impact of the Project is the enhanced conservation and sustainable use of biological diversity in Lesotho. Overall, the pathway towards higher levels of results entails the continuous and progressive improvement of decision-making processes and of governance mechanisms. Schematically, the pathway from the Intermediate State 1 to the intended Impact can be simplified by identifying further transitional conditions (Intermediate States) to be fulfilled, as shown in Diagram 2.
64. Assuming that the National Biosafety Framework is achieved, implemented and maintained (Intermediate State 1 – IS 1), three other Intermediate States can be achieved, as follows:
- "Improved decision-making processes for LMOs approval, effective implementation mechanisms and enhanced quality information and transparency" (**Intermediate State 2 / IS 2**) can be achieved under the conditions that, firstly, the NBF still has the financial resources to effectively monitor all the relevant aspects of the GMOs management and, secondly, a resource mobilisation strategy is conceived and developed. Key impact drivers at that stage are the coordinating role of the Competent National Authority/CNA (DoE), effective GMOs management systems

(e.g. for detection and referral, for handling applications, for risk assessment and monitoring), active stakeholders and public participation, quality information available and timely flowing into the BCH.

- "Improved Governance of National/Regional Biosafety systems based upon: Rule of Law and Compliance, Accountability and Liability, Equity, Transparency and Citizens' Participation" (**Intermediate State 3 / IS 3**) can be achieved under the assumption that the required political will of the Governments is not missing. That should be reflected in the implementation of a National Policy on Biosafety and of an Action Plan. Improved Governance also implies that the national policy on Biosafety is streamlined into government plans and an effective strategy of resource mobilisation is put in place. The main impact drivers at that stage will be effective forms of stakeholder participation (in planning, decision making and funding), conducive to open and transparent information flows and negotiation processes at different levels.
  - The **Intermediate State 4 (IS 4)** is the "Safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements", as requested under art. 1 of Cartagena Protocol (CPB). Political will and negotiations will act as impact drivers at that level, as well as Regional Cooperation among Southern Africa Countries, taking into account regional trade. Main assumption is that decision-making of the National Biosafety Council (NBC, foreseen in the Bill) persists based on rigorous Risk Assessment and Risk Management best practices, and that financial resources flow into Biosafety programs mechanisms. Under the same assumption that internationally followed principles of Risk Assessment and Risk Management are lastingly used by the National Competent Authority, the Project Impact (Enhanced Conservation and Sustainable Use of Biological Diversity in Lesotho) can be achieved.
65. As visualised in Diagram 2, Intermediate States 2, 3 and 4 are not necessarily sequential and could be emerging simultaneously, though it is expected that IS 4 would come after the other two. IS 2 can also be a driving force to IS 3.

**Diagram 1: Pathway towards the National Biosafety Framework**

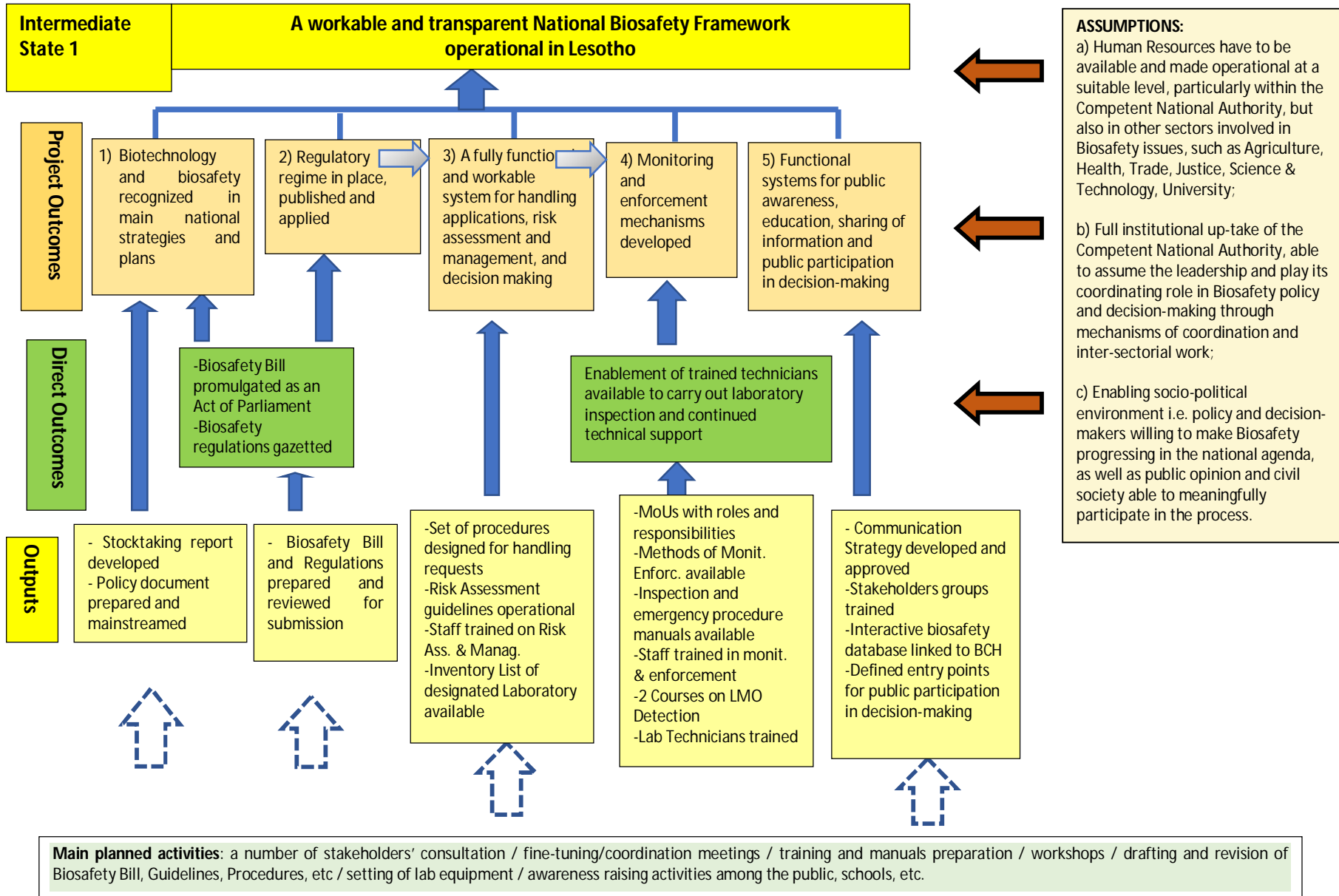
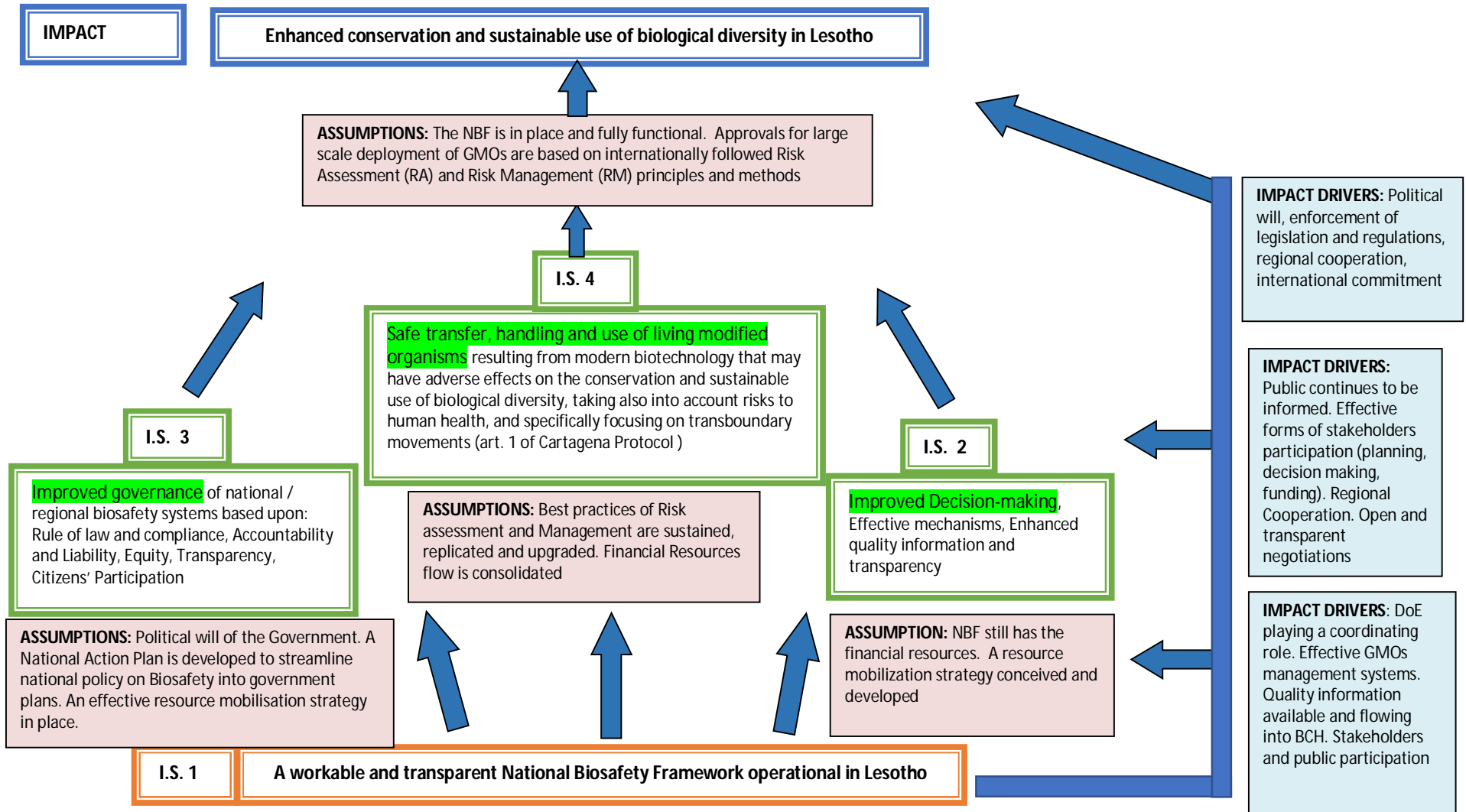


Diagram 2: Pathway from NBF to Impact



## V. EVALUATION FINDINGS

### A. Strategic Relevance

#### Alignment to MTS and POW

66. The Project spans over two UNEP Medium-Term Strategies (2010-2013 and 2014-2017) and three Biennial PoWs (Programme of Work), i.e. 2012-2013, 2014-2015 and 2016-2017, Environmental Governance Sub-Programme. Table 6 here below provides a summarised outline of the contribution of the Project to the Expected Accomplishment (EA) of the Environmental Governance Sub-Programme in the two Medium-term Strategies.

**Table 6: Contribution of the Project to the Medium-Term Strategy (MTS)**

Expected Accomplishment (EA)	Contribution of the Project
<p><b>MTS 2010-2013</b>, Sub-programme Environmental Governance, <b>EA(b)</b>: States increasingly implement their environmental obligations and achieve their environmental priority goals, targets and objectives through strengthened laws and institutions</p>	<ul style="list-style-type: none"> <li>• Overall support to the implementation of the NBF</li> <li>• Draft Biosafety Policy</li> <li>• Draft Biosafety Law and Regulations, Guidelines</li> <li>• Establishment of the National Coordination Committee (NCC)</li> </ul>
<p><b>MTS 2014-2017</b>, Sub-programme Environmental Governance, <b>EA2</b>: The capacity of countries to develop and enforce laws and strengthen institutions to achieve internationally agreed environmental objectives and goals and comply with related obligations is enhanced;</p>	<ul style="list-style-type: none"> <li>• Overall support to the implementation of the NBF</li> <li>• Draft Biosafety Policy</li> <li>• Draft Biosafety Law and Regulations, Guidelines</li> <li>• Establishment of the National Coordination Committee (NCC)</li> <li>• Capacity Building in Risk Assessment and Management</li> <li>• Capacity building and outreach activities of Public Awareness and Information</li> </ul>

#### Alignment to UNEP/GEF Strategic Priorities

67. The project is a Medium Size Project (MSP) financed through GEF-4 mechanism and belongs to GEF Biodiversity Focal Area. It is relevant to GEF Strategic Programme 6 (BD-SP6): Building Capacity for the Implementation of the Cartagena Protocol on Biosafety.
68. Given its focus on Capacity Building and, to some extent, on Technology Support (for instance training in Risk Assessment, Risk Monitoring, Laboratory upgrading) the Project is also aligned with the Bali Strategic Plan (BSP). The project has been active in addressing many of the cross-cutting issues listed in section D of the Plan, such as the strengthening of national institutions, the development of national law and regulations and the compliance with obligations under multilateral environmental agreements. Gender issues were not specifically addressed by the Project.
69. The Project has also promoted South-South Cooperation on Biosafety at regional level (Southern Africa Region) through study-tours and exchanges with neighbouring countries. A multi-country GEF-UNEP Project is currently on-going and giving continuity in the area of GMO laboratories cooperation and network in Southern Africa (including Lesotho). The Project has also benefited from the expertise of regional consultants (Southern and Eastern Africa) for capacity building activities.

### Relevance to Regional, Sub-regional and National Priorities

70. Biosafety is gaining interest and relevance in Lesotho. On the one hand, there is a growing awareness of the richness and strategic role of Lesotho Biodiversity enshrined in its mountain environment, at the heart of Southern Africa Region. This aspect is well described in the Project Document. On the other hand, there is a growing concern regarding food insecurity and vulnerability of rural population (the majority in the country), particularly in the last few years due to the effects of Climate Change and increased periods of drought. This has two relevant consequences: it implies an increased dependency of imported food by the only neighbouring country (South Africa), basically represented by staple-food Maize (likely, GMO maize) and also an increased interest of farmers for cropping GMO Maize varieties from South Africa in a regulated and transparent Biosafety framework.

### Complementarity with Existing Interventions

71. The Project was conceived to implement the Nat. Biosafety Framework (NBF) formulated through the support of the previous GEF/UNEP Project "Development of the National Biosafety Framework" (2003-2005), and actually built upon the achievements and the institutional network created in the context of the previous project. The Project has also been complementary to the GEF/UNEP Projects supporting the setting and consolidation of the BCH in Lesotho and is part of a larger portfolio of GEF projects supporting Biodiversity Conservation in the country.

<b>Rating for Strategic Relevance:</b>	<b>Highly Satisfactory (HS)</b>
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### B. Quality of Project Design

72. The Project Design Quality (PDQ) has been assessed in the Inception Report of the Evaluation, through the detailed "Template for the assessment of the Project Design Quality (PDQ)" prepared by UNEP Evaluation Office, which contemplates a rating system, based on a six-point scale: Highly Satisfactory (6), Satisfactory (5), Moderately Satisfactory (4), Moderately Unsatisfactory (3), Unsatisfactory (2), Highly Unsatisfactory (1), also in use for the main evaluation.
73. The Project Design scores satisfactorily in Relevance and in Financial Planning / budgeting. It scores partially well in some other aspects where one or more shortcomings were detected. For instance, Stakeholders participation was described very synthetically and not appropriately discussed, so that it is not fully clear the role of other national partners in Project implementation. As for Project Governance, it was not clearly explained the substantive difference between the Steering Committee and the National Coordinating Committee (both mentioned in the ProDoc). Sustainability is quite satisfactorily discussed, though, perhaps, too optimistically relying on the full institutional uptake of the project results by the NEA.
74. The Project was probably overoptimistic and unrealistic in defining its expected results. The "one-size fits all" approach used for the whole package of GEF/UNEP Projects of NBF Implementation did not adequately foster a country-tailored approach, possibly leading to the identification of results more adapted to the real country needs and baseline situation. Moreover, the ProDoc did not satisfactorily discuss the causal sequence of activities and results, and the Logical Framework shows misunderstandings of concepts and components (outcomes, indicators, etc.). Risk and Assumptions are also mixing-up concepts, and the overall Risk analysis did not appropriately discuss the causes of the risks and the way of mitigating them. The

Project was also over-optimistic on time planning: initially planned with a duration of 4 years, it has benefited from three no-cost extension for a total of additional three years of duration.

**Rating for Project Design: Moderately Satisfactory (MS).**

**C. Nature of the External Context**

- 75. The Project was implemented during a difficult period of country's socio-political life. Particularly from 2014 onward, Lesotho has experienced complex and tense political instability that has been heavily reflected into the institutional framework.
- 76. The Parliament has been dismissed twice and also Ministries and Secretaries have abruptly changed more than once, including the Ministry of Tourism, Environment and Culture. All procurement tenders have been blocked for 10 months by the Government with a "blanket suspension" of tenders in December 2015, which impacted very negatively on the establishment of the laboratory and the implementation of some planned activities to be executed through consultancies (postponed from 2015 to 2017), as also reported by the Government Auditor-General (Project Audits posted in ANUBIS).

**Rating for Nature of the external context: Highly Unfavourable (HU).**

**D. Effectiveness**

- 77. The information provided by the Project Team in the table "Final Project Output Summary" and in the "Terminal Report" posted in ANUBIS has been analysed and systematised according to the pathway designed in the Theory of Change (Chapter 4). Outputs availability is described by Components/Outcomes following the sequence described in Table 5 and in Diagram 1 of Chapter IV. While following section (Availability of Outputs) summarily describes the key-activities and the process for delivering the expected Outputs, all Project Activities implemented by the Project, as foreseen in Project Work Plan, are detailed in the List of Activities/Output of Annex 5.

**Availability of Outputs**

Outputs related to the Component / Outcome 1 (Policy Integration)	
Rfr: Table 5 / Diagram 1	
1.1 Stocktaking developed	
1.2 Biosafety policy mainstreamed into national sustainable development agenda	

- 78. The Project has timely prepared at the beginning of its activities (2012) a "Biosafety and Biotechnology Stocktaking Analysis Report", which provides a synthetic and clear analysis of the baseline situation of the Policy, Legal and Institutional framework of Biosafety, the level of awareness regarding Biotechnology and Biosafety, and the existing institutional arrangements and planning process among main national stakeholders and international agencies present in Lesotho. The report states that a National Biosafety Policy had been adopted in 2005.
- 79. The report was based on several interviews of main stakeholders and a national survey (300 standardised questionnaires from three districts representing the country's three ecological zones) that included the academia, farmers, NGOs, regional and international organizations, government institutions, media and the private sector. The study was



useful to identify gaps and priorities and to guide Project capacity building and awareness activities.

80. The integration of Biosafety in National Policies has so far been achieved mainly through the inclusion of Biosafety in the National Biodiversity Strategy and Action Plan (NBSAP), as also documented by the 6th National Report to the CBD (2020) regarding the achievement of Biodiversity Aichi Targets. With regard to the National Biosafety Framework, the National Report highlights several achievements (as also discussed here below in this chapter), yet it recognises that the "Integration / mainstreaming of biosafety into national development plans as well as sectoral policies is slow". This is a relevant finding when considering the key-drivers and assumptions to hold for progressing towards the full operationalisation of the NBF and improved processes of decision-making and biosafety governance (see ToC, Chapter IV, Diagram 1 and 2).

Outputs related to the Component / Outcome 2 (Regulatory regime)	
Rfr: Table 5 / Diagram 1 2.1 Biosafety Bill and Regulations prepared and reviewed for subsequent submission for approval In <u>ProDoc</u> : Biosafety Bill promulgated as an Act of Parliament and Biosafety regulations gazetted (see Table 5 above)	

81. The first version of the Biosafety Bill was prepared in 2007 and was continuously discussed and reviewed, particularly during the Project timeframe, until the current version (called Biosafety Bill 2018, posted in Anubis). The Bill, however, has not been enacted so far, as originally planned (see Table 5 and Direct Outcome in Diagram 1).
82. The Project has also produced Writing Instructions for Biosafety Regulations (last reviewed in October 2018) related to the Bill to be enacted. Manuals and guidelines foreseen to operationalize the regulatory regime have not been prepared due to the lack of a Biosafety Act and Regulations.
83. Causes for the remarkable delay in setting the Biosafety Regulatory Regime are not clearly discussed in the terminal documents of the Project (Terminal Report and Final Outputs), as well as along the annual PIRs (Project Implementation Reports). It is mentioned, however, in a document produced by the Project (December 2018, posted in ANUBIS) and titled "Self-learning" (a sort of Lessons Learned) that "The Parliament of Lesotho was dissolved twice during the life of the Project, hence the Bill had to start the process again".
84. Interviews with the Project Team have confirmed that (we quote) the "Parliament Portfolio Committee was actually engaged and reviewed the Bill also providing comments, but the Parliament was dissolved before the Bill was passed". High turnover of the Principal Secretaries in the Ministry of Environment (several times during Project life) was also pointed out as highly limiting and delaying Project activities. As a matter of fact, country's political instability particularly from 2014 onward may have represented a strong challenging factor for Project implementation.

Outputs related to the Component / Outcome 3 (Handling of Applications)	
Rfr: Table 5 / Diagram 1 3.1 Set of procedures designed for handling requests 3.2 Handling requests, Risk Assessment and Decision-Making guidelines operational	

3.3 Decision-makers and staff trained on Risk Ass. & Management 3.4 Inventory List of designated Laboratory
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85. Despite the protracted delays in progressing with the regulatory regime, the project has at any rate given steps for the design and implementation of the administrative system of the Biosafety Framework. A "Manual for handling requests and applications of genetically modified organism in Lesotho" has been produced and published (April 2017). "Guidelines for risk assessment and risk management of Genetically Modified Organisms (GMOs) in Lesotho" have equally been produced (January 2018), as well as a draft of "Guidelines for socio-economic issues to consider in decision-making of genetically modified organisms" (August 2018).
86. National training workshops were also organised related to the topics covered by the Manual and the Guidelines mentioned above for a total of 50 people (27 M and 23 F). Gender balance was deliberately considered by the Project Team. The majority of the participants were from the Ministry of Tourism, Environment and Culture, with a good representation also from Min. of Agriculture and Min. of Health.
87. An initial laboratory assessment (2013) was conducted regarding existing facilities in view of their upgrading for GMO detection. Two laboratories were assessed, at the Lesotho Agricultural College and at the National University of Lesotho, the latter showing better facilities and potential for GMO detection.

Outputs related to the Component / Outcome 4 (Monitoring and Enforcement)	
Rfr: Table 5 / Diagram 1	
4.1 Inter-institutional MoUs with roles and responsibilities	
4.2 Methods of Monitoring & Enforcement developed	
4.3 Inspection and emergency procedure in place	
4.4 Staff trained in monitoring & enforcement	
4.5 Two Courses on LMO Detection	
4.6 Lab Technicians trained	

88. In order to define specific roles and responsibilities on Management and Control of risks associated with the use and release of living modified organisms, a Memorandum of Understanding (MoU) has been signed between the Ministry of Tourism, Environment and Culture and the National University of Lesotho (NUL) specifically concerning the establishment of the GMO detection laboratory at NUL. On this regard, it has to be noted that main equipment for the GMO laboratory has been purchased with delays (see chapter V, Section C) and the Laboratory is not yet operational. Further training is ongoing through a regional GEF-UNEP Project.
89. Regarding the development of appropriate methodologies for Monitoring and Enforcement mechanisms to handle GMOs use, relevant tools have been produced, such as the Guidelines for monitoring environmental effects of genetically modified organisms in Lesotho (2017), comprehensive Guidelines for emergency response, accidental release, illegal movement, transit, contained use, advance informed agreement procedure, food, feed or processing procedures, handling, packaging, and transport of genetically modified organisms in Lesotho (2017), as well as Guidelines for enforcement of licensing conditions (2018).

90. Several training activities were delivered mainly addressing officers and staff of different Ministries. A series of national workshops targeted about 267 staff of different Ministries (123 M and 144 F) on emergency response measures. Moreover, 13 (7 M and 6 F) Customs and Border Control Officers were trained on multilateral environmental agreements and on inspection of genetically modified organisms.
91. Regarding laboratory GMO detection, a Manual was produced and 11 lab personnel (7 M and 4 F) received a preliminary training on GMO detection. It is questionable, however, the utility of training lab personnel in absence of a GMO laboratory in place. In fact, the basic laboratory equipment for GMO detection was only purchased in 2017 due to the "blanket suspension" of tenders in December 2015, and is currently stocked at the University.

Outputs related to the Component / Outcome 5 (Public Awareness, Education and Public Participation)	
Rfr: Table 5 / Diagram 1 5.1 Communication Strategy developed 5.2 Advocacy groups set 5.3 Stakeholders groups trained 5.4 Interactive biosafety database linked to BCH 5.5 Defined entry points for public participation in decision-making	

92. After the Stocktaking Report mentioned under Component 1, a follow up National Biotechnology and Biosafety Awareness Strategy 2012 – 2017 was prepared in 2015. The scope of the Strategy is broad and can be considered a general frame of work for defining specific and concrete plans of action in some national priority areas.
93. Two Surveys on the level of Awareness of biotechnology and biosafety were carried out in 2012 and 2017 by the Department of Environment. The respondents across the nation (10 districts) were, respectively 1.786 (2012) and 4.005 (2017). The effort for developing such a large survey is highly commendable. It is, therefore, quite disappointing that the last survey (2017) was not given (at least not documented) the treatment and analysis it should have deserved. The methodology of the survey (notably the sampling) is not explained in the final Survey Report. The respondents are not categorised, and there is no data cross-check, making difficult to match responses with social groups (e.g. by age, sex, occupation, etc.). From information collected during the evaluation, it also appears that the definition of the target groups in the two surveys was different, which makes impossible to assess and compare changes in the level of awareness from 2012 to 2017 possibly due to Project activities.
94. Beside the training material produced for the different workshops mentioned before, the Project has produced, through an international (regional) UNEP Consultant a series of five remarkably simple, yet exemplary Technical Training Manuals, which can be considered a precious instrument for Biosafety Education. They could, for instance, be used by University students. The five manuals form a sort of "compendium" regarding (a) the Cartagena Protocol on Biosafety, (b) the Biosafety Regulatory Framework of Lesotho, (c) of South Africa; (d) of USA, (e) of EU.
95. The work done by the Project on awareness raising has been truly remarkable and addressed different target groups. We can mention, among others, workshops for the staff of the Competent National Authorities, for media practitioners, for mainstreaming biotechnology and biosafety into training courses at primary and high school levels (more than 200 participants, mainly teachers) and for a group of possible future trainers on Biosafety. There has also been a preliminary workshop for Civil Society Organizations

- on public access to information and participation in decision-making on approval of living modified organism.
96. Other kind of public events have also been organised in different districts and areas, such as a Biotechnology Fair (2013), a Biosafety Fair (2014) and a Biotech and Biosafety Fair (2015), as well as the production and dissemination of outreach materials for different audiences and communities in both languages (Sesotho and English), such as brochures, calendars, posters, banners, CD ROM, online Forum, radio and TV programmes.
  97. Interactive biosafety database linked to BCH, foreseen as an expected Output, has remained comparatively behind. The national BCH in the website of the Department of Environment (DoE) does not seem regularly updated. The last document uploaded appears to be the Biosafety Policy of 2005. The same may apply to the Lesotho page in the Global BCH.

### **Final remarks on Outputs availability**

98. With the support of the Project the Biosafety Bill 2018 has been drafted, guidelines for risk assessment, risk management, monitoring and enforcement have been developed, as well as a manual for handling requests. Laboratory equipment for Living Modified Organisms (LMOs) testing have been procured. Additionally, the Project developed a broad National Biotechnology and Biosafety Awareness Strategy 2012 – 2017 and carried out outreach programmes in the form of workshops, awareness materials, newspaper, radio and TV programmes, and mainstreaming into educational curriculum. A very large number of people have been exposed to training activities on different issues related to Biosafety, as described in this section (773 participants, 413 M and 360 F). The effectiveness of this large activity of Capacity Building is discussed in next Section.
99. The Project has taken into account the need of approaching, raising awareness and building capacities among different societal groups, as shown by the large national surveys and different outreach activities. A large effort has been done for producing main outreach materials in Sesotho language. All training activities carried out by the Project have deliberately considered the balance of gender and the gender disaggregated data provided by the Project reports show a high rate (47%) of women participation (see above).
100. Despite obvious obstacles, the National Executing Agency and its partners have been able to deliver relevant Outputs that could be useful for implementing the NBF when more conducive socio-political and institutional frameworks will be steadily in place. Despite the evident delays in Outputs delivery (discussed under Project Efficiency, Section F), everything considered, Outputs achievement has been rated Satisfactory (S).

### **Achievement of Project Outcomes**

101. The Evaluation has assessed to what extent the actual delivery of the Outputs has produced the institutional changes and systemic effects (Outcomes) resulting in a fully operational National Biosafety Framework. On this basis, this chapter presents a qualitative analysis and interpretation of the Outcomes achieved in the light of the reconstructed Theory of Change (TOC) from Outputs to Outcomes, visualised in Diagram 1.
102. Outcome 1 "Biotechnology and biosafety recognized in main national strategies and plans" has been partially achieved. Though it is true and relevant that the country has a

Biosafety Policy from 2005, it is recognised in the National Report (2020) to the Secretariat of the Convention on Biological Diversity (SCBD) that Biosafety Policy "should be reviewed to reflect the reality of resources and capacity constraints and the fact that Lesotho is surrounded by a country that has embraced use of GMOs for a while now". This seems a wise remark and shows that the Competent National Authority is doing its best to include Biosafety in the national policies and strategies regarding Biodiversity and Sustainable Development. There is, therefore, room for a substantive action of the Ministry and the Government for the implementation of a clear Plan of Action concerning the development and use of Biotechnologies in the country and their management through Biosafety measures.

103. Outcome 2 "Regulatory regime in place, published and applied" has not been achieved so far, despite all efforts deployed by the Project. As mentioned in the previous section regarding Outputs delivery, the situation of political and institutional instability of the country in recent years, coupled with lengthy procedures for laws discussion and approval, have strongly affected the smooth progression towards the approval and enactment of the Biosafety Bill.
104. Outcome 3 regarding "A fully functional and workable system for handling applications, risk assessment and management, and decision making" and Outcome 4 "Monitoring and enforcement mechanisms developed" obviously depend on the existence of a clear regulatory framework in place, as discussed in the ToC (chapter IV and diagram 1). The Project has prepared several manuals and guidelines for handling applications and decision-making, as well as for monitoring and enforcement, which did not produce tangible effects due to the lack of a Biosafety regulatory system in place for their application. In absence of enforceable guidelines and procedures, the GMO detection laboratory has not yet been established, although the equipment was bought in 2017.
105. As for Outcome 5 "Functional systems for public awareness, education, sharing of information and public participation in decision-making", it is evident the notable effort made by the Project in that direction, as substantiated by the various activities and deliverables produced. It has been highlighted in the previous chapter the relevance of the two "Surveys on the level of Awareness of biotechnology and biosafety in the country" carried out in 2012 and 2017, which can possibly provide significant elements for a more focussed communication and participation strategy for the near future, matching different target groups (e.g. decision-makers, technical officers, farmers, consumers, young people and women).

#### **Final remarks on Outcomes achievement**

106. The Biosafety Framework of Lesotho started from a very low baseline and has progressed within a highly limiting context. The scores presented by the Project Team in the Initial, Mid-Term and Final "Tracking Tools"<sup>4</sup> objectively reflect this situation. They were, respectively: 6/32, 13/32 and 19/32. Virtually all relevant assumptions outlined in the ToC and visualised in Diagram 1 still stand unfulfilled.
107. The Department of Environment (DoE) is understaffed and there is currently only one technical officer in charge of Biosafety, among other responsibilities. The effectiveness of the large Capacity Building programme implemented through the Project has been strongly challenged by the low level of institutional uptake and consolidation of the

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<sup>4</sup> The Tracking Tool is the GEF instrument used to measure progress in achieving the impacts and outcomes established at the portfolio level. It is completed by the Project Team at the beginning of the Project, at mid-term and at Project completion.

Biosafety Framework within the Competent National Authority (DoE) and the other National Stakeholders (e.g. Min. of Agriculture, Min. of Health).

108. Overall, the Department of Environment does not seem sufficiently empowered to play a leading and coordinating role in implementing the National Biosafety Framework, and the socio-political environment has not been conducive to put forward Biosafety agenda in the country. As a result, Policy, Regulatory and Administrative systems did not satisfactorily progress despite the support of the Project.
109. As discussed above, given the logical sequence between Outcomes 2, 3 and 4, failing to achieve the adoption and implementation of a Regulatory Regime (Outcome 2), has hampered the setting of the Biosafety Administrative System and of the Monitoring and Enforcement System (Outcomes 3 and 4). In retrospect, during Project Preparation and Design this issue should have been deeply analysed and discussed with the Competent National Authority, and alternative / mitigating measures could have been envisaged and explored. As discussed in chapter V (Section B, Project Design), the "one-size fits all" approach was not useful in that perspective. Also considering the unfavourable external conditions described in chapter V (Section C), the achievement of Project Outcomes has been rated Moderately Unsatisfactory (MU).

#### **Achievement of Likelihood of Impact**

110. The conditions are not yet in place to envisage a possible pathway from Project Outcomes to the intended Impact of the Project, as discussed in the ToC and visualised in Diagram 2. One has also to consider that Lesotho's HDI (Human Development Index) value is positioned at 164 out of 189 countries (2018). Strong challenges faced by the country regarding Rural Poverty, Unemployment, Health and Social sectors may also jeopardise the Government support for the implementation of the Biosafety agenda.
111. Regional and international support should, therefore, still play a substantive role in maintaining Biosafety well present in the Agenda (see Drivers in Diagram 2, Pathway to Impact). At current stage, the Likelihood of the Project results to contribute to the achievement of the expected Global Environmental Benefit (Impact), i.e. "Enhanced conservation and sustainable use of biological diversity in Lesotho" looks Moderately Unlikely (MU).

**Rating for Effectiveness: Moderately Unsatisfactory (MU) <sup>5</sup>**

#### **E. Financial Management**

112. The Project has satisfactorily managed main financial and administrative aspects. Table 7 here below is assessing the main components of the Financial Management:

- (a) Adherence to UNEP's Financial Policies and Procedures;
- (b) Completeness of Financial Information;
- (c) Communication between Finance and Project Management Staff.

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<sup>5</sup> This rating has been upgraded to **Moderately Satisfactory (MS)** according to UNEP guidelines: "Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together".

As showed in table 7, financial reports have been prepared regularly, appropriate administrative procedures for procurement have been adopted and the purchase of the main equipment (laboratory) has been carried out without major problems, except external causes that impacted negatively on tenders delays. Eight Budget Revisions have been prepared and approved, mainly for re-allocation of unspent money, without substantive changes through budget lines. Audits of the last two years of the Project (2017-18) are, however, still due.

**Table 7: Financial Management Table**

Financial management components	Rating	Evidence/ Comments
1. Adherence to UNEP's/GEF's policies and procedures	S (Satisfactory)	<ul style="list-style-type: none"> <li>- Periodic financial reports provided</li> <li>- Financial Inventory reports annually prepared from 2012 onward. Final inventory prepared and accepted (all in Anubis).</li> <li>- Project complied with UN procurement procedures</li> <li>- Tender procedures highly affected by a Government "blanket suspension" of all tenders (10 months) throughout 2016</li> <li>- Audit reports from the Auditor General of the Government presented annually from 2012 to 2016. No auditing documented in 2017 and 2018 .</li> <li>- Audit of 2015 (expected final year) raised problems in carrying out a proper auditing since the budget formats used in the initial budget and in expenditures accounting to be audited were different, one was by component and the other by category / activity (<u>this is a problem generated by GEF/UNEP Project Budget Design</u>).</li> </ul>
2. Completeness of project financial information:	S (Satisfactory)	Provision of key documents to the evaluator : <ul style="list-style-type: none"> <li>- Co-financing and Project Cost's tables at design (by budget lines) available in ANUBIS</li> <li>- Revisions to the budget posted in ANUBIS</li> <li>- All relevant project legal agreements in ANUBIS</li> <li>- Fund transfers registered in ANUBIS</li> <li>- Proof of co-financing (in-kind) declared in the Project Terminal Report, but not described and discussed</li> <li>- Summary reports on project's expenditures by budget lines regularly provided through Quarterly and Annual financial reports</li> <li>- Completed audits available in ANUBIS (lacking last audits of 2017 and 2018)</li> </ul>
3. Communication between finance and project management staff	S (Satisfactory)	<ul style="list-style-type: none"> <li>- Project Manager and Task Manager fully aware of the project's financial status</li> <li>- Fund Management Officer's aware of project progress/status when disbursements are done</li> <li>- Financial issues (remittances, approvals, etc.) timely addressed</li> <li>- Regular Contact/communication between Fund Management Officer, Project Manager/Task Manager during the preparation of financial and progress reports.</li> </ul>

**Table 8: GEF Budget at design and expenditures by Budget Line / Object of Expenditure (12/2018)**

UNEP BUDGET LINE / OBJECT OF EXPENDITURE	Estimated cost at design (USD)	Actual Cost (USD)	Expenditure ratio (actual/planned)
10 PROJECT PERSONNEL	296,070.00	250,463.30	
20 SUB-CONTRACT	0.00	3,145.55	
30 TRAINING	330,329.00	310,673.29	
40 EQUIPMENT & PREMISES	205,119.00	210,867.22	
50 MISCELLANEOUS	53,288.00	109,656.64	
<b>Total</b>	<b>884,806.00</b>	<b>884,806.00</b>	<b>100%</b>

**Table 9: Co-financing Table (Source: Project Terminal Report)**

Co-financing (Type/Source)	UNEP own Financing		Government US\$		Other * US\$		Total US\$		Total Disbursed US\$
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
Grants									
Loans									
Credits									
Equity investments									
In-kind support			817,000	817,000			817,000	817,000	817,000
Other *									
<b>Total</b>			<b>817,000</b>	<b>817,000</b>			<b>817,000</b>	<b>817,000</b>	<b>817,000</b>

\* This refers to contributions mobilized for the project from other multilateral agencies, bilateral development cooperation

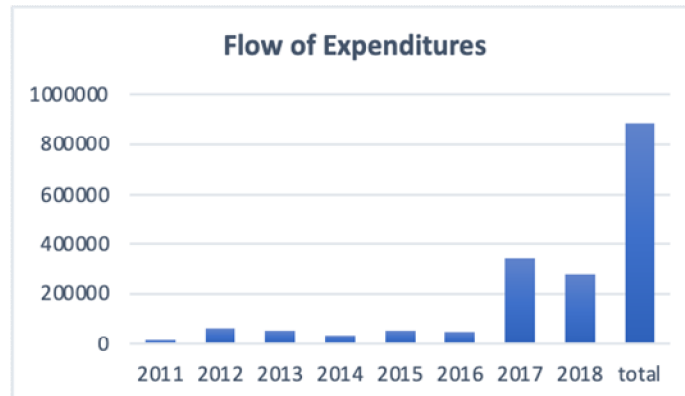
**Rating for Financial Management: Satisfactory (S)**

## F. Efficiency

113. Overall, the Project has not been time-efficient (see diagram below). There was a very slow start and a low rate of delivery until the planned termination date (2015). This was related to the problems of political and institutional instability described in Chapter V Section C, changes in the leadership of the National Executing Agency (Ministry of Tourism, Environment and Culture) and in the Department of Environment, limited Human Resources in the Department and a certain bureaucratic inertia within and outside the National Executing Agency / Competent National Authority. As discussed in Chapter B Section B, the Project Design was, in retrospect, also quite overambitious and unrealistic.
114. As a matter of fact, the Task Manager and the Auditors had repeatedly alerted the National Executing Agency regarding the excessively low rate of activities implementation until 2015. Three subsequent no-cost extension for a total of 36 months were approved, which represents an increment of 75% of the planned time duration of the Project. The diagram below shows the unbalanced flow of expenditures from the beginning of the Project (2011) to its actual end (2018). Around 70% of the Project Budget was spent in the last two years (2017-18), during the extension period, whereas, at the planned end date (2015), only 24% of the budget had been spent. This, of course,



may also raise questions related to cost-effectiveness and results sustainability. For instance, the laboratory equipment bought in 2017 has not been installed and used so far.



115. Expenditures for laboratory equipment accounts for around 15% of the budget, while other significant fractions of the budget were spent for Meetings (21%), Consultants (16%), Training (14%) and Staff Travel (12%). Project staff salaries were entirely paid through the Government co-financing. Overall, the Project has been implemented through the Competent National Authority (the Department of Environment) and has fostered other stakeholders' involvement and complementarities (e.g. Min. of Agriculture, University). The international consultants that supported capacity building activities came from the Southern Africa and the Eastern Africa Regions, which minimised UNEP's carbon footprint.
116. The effectiveness of the Capacity Building activities and, more specifically, of the Regional Expertise deployed by the Project to support the implementation of the NBF (Consultants and Training represent 30% of the Budget) has been lower than expected, as also discussed in Chapter V, Section on Effectiveness. This weakness has also undermined Project Efficiency, namely its Cost-Effectiveness.

**Rating for Efficiency: Unsatisfactory (U)**

## G. Monitoring and Reporting

### Monitoring Design and Budgeting

117. The costed Monitoring and Evaluation (M&E) Plan (Appendix 7 to the ProDoc) had a budget estimated to as USD 25,000. Actually, in the approved budget, the total amount for the Plan included USD 27,000 for Mid-term (USD 15,000) and Final Evaluation (USD 12,000), plus USD 10,000 for Auditing. Monitoring was, therefore, supposed to be implemented through "no-cost" activities, such as the continuous monitoring of the UNEP Task Manager (TM), the direct exchanges between the Project Team and the TM, and the annual Project Implementation Report (PIR).

### Monitoring and Reporting of Project Implementation

118. The Project Team has regularly monitored activities implementation, though not always able to timely and effectively find solutions to make the Project more efficient and effective. Problems of leadership and governance at higher level in the Competent National Authority linked to the overall difficult socio-political environment have also strongly challenged project management and monitoring implementation.

119. Main instruments for monitoring implementation have been the workplans and the tools of the Project Implementation Report (PIR), which schematically address (through percentage of implementation) the level of progress towards the objectives and the rate of activities implementation. TM has provided continuous support and follow-up through constant communication (email, etc.) and through the participation to the annual regional meetings of the National Project Coordinators.
120. Emphasis is given, at all levels of Monitoring, on Activities and Outputs delivery, and less on Outcomes achievement. The only reporting instrument that has a valuable approach focussed on Outcomes (and specific to Biosafety Projects) is the so-called "GEF Tracking tool" (see footnote 5 in this Report) that was prepared at the beginning, at mid-term and at the end of the Project. Reporting have been regularly done through the annual PIRs, duly revised by the TM, particularly the Risk Table with relevant comments and recommendations, when needed.

**Rating for Monitoring and Reporting: Satisfactory (S)**

## **H. Sustainability**

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

### **Socio-political Sustainability**

122. Although the country has presented its 4th National Report to the Secretariat of the CPB in 2019, Biosafety does not seem to be among the priorities of policy and decision-makers in Lesotho. As already mentioned, the Biosafety Policy in place dates from 2005 and needs to be reviewed and updated, whereas the Biosafety Bill that has been reviewed and updated in recent years has not yet been enacted.
123. The NBSAP dates from 2000 and the Fourth National Report on the Implementation of Convention on Biological Diversity was produced in 2009. The country has not officially adopted National Biodiversity Targets and has recently reported (2020) its progress using the Aichi Biodiversity Targets for reference, as previously discussed in Section D. This can be regarded as a promising sign.
124. The Project has developed many activities in terms of raising awareness and information with a range of national stakeholders, including Governmental institutions, the Academic world, Schools and Youth, and the General Public. The "National Survey on the level of Awareness of Biotechnology and Biosafety" in the country carried out by the Project in 2017 (3.000 respondents) has not yet, unfortunately, been given proper treatment and data analysis. This has so far deprived Biosafety Stakeholders of valuable information for targeting different societal groups through oriented actions of sensitisation, possibly improving future socio-political sustainability of Biosafety Agenda.
125. Socio-political sustainability will also crucially depend on the setting of a sound and transparent process of discussion, decision-making and implementation of the Biosafety agenda at national level through an open and participatory approach, which has not happened so far.

### **Financial Sustainability**

126. Though the Project Documents did mention forms of financial sustainability for Biosafety through an annual budgetary provision from the Government and

complementary resources from application fees and licensing fees, all these mechanisms seem still far from being implemented in the absence of a Biosafety Regulatory Regime. Supplementary funding for the improvement and operationalisation of the GMO laboratory established through the Project has been obtained through the on-going GEF-UNEP "Multi-Country Project to Strengthen Institutional Capacity on LMO Testing in Support of National Decision-making", a Full-size Project targeting seven regional laboratories in Southern Africa Region.).

### **Institutional Sustainability**

127. The current anchorage of Biosafety within the structure of the Competent National Authority (CNA) for the CPB and the CBD (the Department of Environment / DoE of the Ministry of Tourism, Environment and Culture / MTEC) is a positive factor to be considered.
128. Nevertheless, the fact that Biosafety is just anchored to a Division of a Department (DoE) within a larger, inter-sectorial Ministry (MTEC) has obvious implications in terms of institutional relevance and robustness, which may influence Biosafety institutional sustainability. In fact, decision-making chain, as far as Biosafety is concerned, goes from the Director of Environment to the Principal Secretary and eventually to the Minister and the Government.
129. The National Coordinating Committee established to oversee the implementation of the Project, which could have represented the starting point of the National Biosafety Council foreseen in the Biosafety Bill, is no longer functional since the closure of the Project.
130. The very limited number of staff dedicated to Biosafety within the structure of the CNA has also hampered the full uptake by the national staff of the international (mainly regional) expertise made available through the Project, in terms of knowledge acquisition and of creation of sustainable national capacities. This issue had also a bearing on Project Efficiency (see Section F)

**Rating for Sustainability:** **Moderately Unlikely (MU)**

## VI. CONCLUSIONS AND RECOMMENDATIONS

### A. Conclusions

131. The Project was conceived to support Lesotho in having a workable and transparent National Biosafety Framework (NBF) through the setting and implementation of its five-core components, i.e. a Biosafety policy, a regulatory regime, an administrative system, a follow-up/monitoring/enforcement system and mechanisms for public awareness, education and participation. These five elements of the NBF coincide, in fact, with the five expected Outcomes of the Project (see Table 5 and Diagram 1 in chapter IV, Theory of Change).
132. The common approach of GEF/UNEP projects for "National Biosafety Framework Implementation" entails a similar design and expected results across countries, which may prove difficult to implement in countries where baseline situations are distant from Project targets, and the overall external conditions are unfavourable to a smooth and time-efficient progress towards expected results. The Project Document had, in fact, recognised that in Lesotho the level of knowledge and practices of biotechnology and biosafety was quite low, the regulatory and institutional capacity to implement the NBF was limited, and "lack of awareness among key agencies, poor institutional coordination, lack of human resources" were considered main issues to be tackled and improved through the Project.
133. All the above would have probably suggested a more cautious approach in defining Project Outputs and Outcomes, which, in retrospect, proved to be quite unrealistic. More so, given the particularly difficult and unexpected socio-political context in which the Project developed its activities, characterised by a tense political instability that has heavily reflected into the institutional framework. During the Project timeframe, Parliament was dismissed twice, Ministries and Principal Secretaries have changed abruptly, including in the National Executing Agency, and procurement tenders and consultant recruitment have been blocked by a long "blanket suspension".
134. Faced with these impediments, the Project has provided proof of resilience and risk adaptation. Time-efficiency, however, has been highly challenged and three subsequent no-cost extensions, of one year each, were required and obtained. Around 70% of the Project Budget was spent in the last two years (2017-18), during the extension period.
135. With the support of the Project, the Biosafety Bill has been discussed among the stakeholders, drafted and presented to the Parliament, though not formally approved and promulgated as originally foreseen, due to the two Parliament dismissions. Relevant guidelines for risk assessment, risk management, monitoring and enforcement have also been produced, laboratory equipment for GMO detection was eventually procured, trainings have been organised and a broad awareness strategy was developed through outreach programmes (workshops, awareness materials, media programmes, etc.).
136. Project Activities and Outputs delivery occurred thanks to the championing role of few people of the Department of Environment (and few members of the National Coordinating Committee established by the Project), supported by UNEP through the assiduous back-stopping of the Task Manager and the technical assistance of regional consultants mobilised by the Project. The institutional framework of Biosafety in the country, however, has proved to be too circumscribed (a Department with narrow decision-making power) and feeble to catalyse solid and sustainable effects (Outcomes) among national institutions (different Ministries, Customs, University, Private sector, etc.). As a consequence, the sustainability of Project results is weak and little progress can be registered after the termination of the Project.

137. It can be concluded that Policy, Regulatory and Administrative systems did not satisfactorily progress despite the support of the Project and a "workable and transparent National Biosafety Framework" is not operational, as initially foreseen. There is, therefore, the need for a more comprehensive, in-country analysis at Ministerial and Governmental level about the priority to be given to Biosafety and to the fulfilment of Cartagena Protocol requirements. Taking into account the dimension and geographical location of the country, regional institutions and cooperation may also help in this assessment and in finding appropriate and viable solutions.
138. Though not explicitly addressed in its activities, the Project has considered Human rights and Gender as relevant dimensions of its intervention. The Project has actually developed many outreach activities of information and awareness raising targeting different societal groups and promoting their involvement in the process of NBF implementation. All main outreach material has been produced in Sesotho language. The Project has also deliberately considered and applied a gender-balanced approach in developing its activities, particularly capacity building.
139. The Evaluation was also requested to answer two key strategic questions (see ToR):
- (a)** To what extent did the project help to enhance national institutional and technical capacity and awareness amongst the key actors for effective enforcement of the Biosafety Law, decrees and sub-decrees on biosafety?
- (b)** To what extent are the outcome indicators verifiable, and record progresses towards the achievement of the development objectives, as well as the obligations under the Cartagena Protocol?

**Answer to Question (a):**

The Project has implemented several Activities and made available relevant Outputs for enhancing national institutional and technical capacities to implement the National Biosafety Framework (NBF) in Lesotho, including a Biosafety Law and subsequent Administrative and Enforcement Systems. The political commitment and responsiveness of the country, however, has been much lower than expected. Regulatory tools have not yet been adopted and inter-institutional mechanisms are not operational for further promoting and steering the NBF. Overall, the role and the capacities of the Competent National Authority (Department of Environment) have not been sufficiently strengthened to enable the institutional up-take and sustainability of Project activities and results.

**Answer to Question (b):**

The Project Document did not satisfactorily discuss the causal/logical sequence of activities and results, and the Project Results Framework also showed a certain misunderstanding and overlapping of concepts and components (outcomes, outputs, indicators, targets, etc.). Despite these shortcomings, the Results Framework and the Monitoring & Evaluation Plan of the Project provided sufficient elements to verify and record progresses towards Project Objectives and the fulfilment of Cartagena Protocol obligations. In practical terms, however, the two main Terminal Documents prepared by the Project, i.e. the Terminal Report and the Final Project Output Summary (formats provided by UNEP) basically refer to the delivery of Outputs and Activities. The main instrument adopted to assess the achievement of Outcomes are GEF "Tracking Tools", which measures the progress of the National Biosafety Framework at the beginning of the Project (Baseline situation), at Mid-Term and at the End of the Project, in a progressive scale from 0 to 30 (see chapter V, Section D, Final remarks on Outcomes achievement, § 106).

## B. Summary of project findings and ratings

140. The following Table provides the summarised ratings and findings of the criteria established by UNEP Evaluation Office (EO) that have been discussed and assessed in Chapter V. Overall, the Project demonstrates a rating of **"Moderately Satisfactory" (MS)**.

**Table 10: Summary of project findings and ratings**

Criterion	Summary assessment	Rating
<b>Strategic Relevance</b>	<b>Highly Relevant particularly considering the regional, sub-regional and national context.</b>	<b>HS</b>
1. Alignment to MTS and POW	Well aligned with MTS 2010-2013 and 2014-2017 Sub-Programme Environmental Governance.	S
2. Alignment to UNEP/Donor strategic priorities	Project belongs to GEF Biodiversity Focal Area, Strategic Programme 6 (BD-SP6): "Building Capacity for the Implementation of the Cartagena Protocol on Biosafety".	S
3. Relevance to regional, sub-regional and national environmental priorities	Highly relevant to accommodate Biosafety concerns with Food Security and Food Safety in the country, taking into account its regional context.	HS
4. Complementarity with existing interventions	Complementary with Projects supporting BCH and part of a larger portfolio of GEF projects supporting Biodiversity.	S
<b>Quality of Project Design</b>	<b>Satisfactory in some parts. Overoptimistic and unrealistic in defining expected results. Causal sequence of activities and results not discussed. Logical Framework shows misunderstandings of concepts and components.</b>	<b>MS</b>
<b>Nature of External Context</b>	<b>Complex and tense political instability heavily reflected into the institutional framework. Parliament dismissed twice. Ministries and Secretaries changed more than once, including the Ministry of Environment. Procurement tenders blocked.</b>	<b>Highly Unfavourable</b>
<b>Effectiveness<sup>6</sup></b>	<b>Increased from MU to MS according to Foot-note 7</b>	<b>MU→MS</b>
1. Availability of outputs	Relevant Outputs delivered, despite unfavourable context.	S
2. Achievement of project outcomes	Limiting socio-political and institutional context did not permit to achieve the implementation of the Regulatory, Administrative and Monitoring/Enforcement systems.	MU
3. Likelihood of impact	Conditions not yet in place to envisage a possible pathway from Project Outcomes to the intended Impact of the Project	MU
<b>Financial Management</b>		<b>S</b>
1. Adherence to UNEP's financial policies and procedures	<b>Overall compliant</b>	<b>S</b>
2. Completeness of project financial information	Financial reporting regularly completed and filed	S
3. Communication between finance and project management staff	Smoothly in place throughout project life	S

<sup>6</sup> Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together

Criterion	Summary assessment	Rating
<b>Efficiency</b>	<b>Not time-efficient also due to external factors. Very low starting and delays. Three years of no-cost extension. Most of the budget spent during the extension period</b>	<b>U</b>
<b>Monitoring and Reporting</b>	<b>Overall satisfactory</b>	<b>S</b>
1. Monitoring design and budgeting	Monitoring Plan designed, mid-term review budgeted	S
2. Monitoring of project implementation	Through Progress Reports, regular monitoring, assiduous backstopping of TM	S
3. Project reporting	Progress Reports and PIR regularly produced and filed in ANUBIS, as well as NBC meetings' reports.	S
<b>Sustainability</b>		<b>MU</b>
1. Socio-political sustainability	Crucially depending on the setting of a sound and transparent process of discussion, decision-making and implementation of the Biosafety agenda at national level	MU
2. Financial sustainability	Mechanisms for biosafety national funding not in place	MU
3. Institutional sustainability	Biosafety just anchored to a Division of a Department (DoE) within a larger, inter-sectorial Ministry (MTEC). Long decision-making chain.	MU
<b>Factors Affecting Performance</b>		<b>S</b>
1. Preparation and readiness	Project builds upon previous project "Development of NBF". Stakeholders participation and institutional framework not well discussed. "One-size fits all" approach in Project Design not appropriate	MU
2. Quality of project management and supervision	Project appropriately managed and assiduously backstopped by UNEP TM	HS
3. Stakeholders' participation and cooperation	Assiduous participation of main stakeholders, reflected in the work of Coordinating Committee	S
4. Responsiveness to human rights and gender equity	Not explicitly implemented, not referred to in any Project document / report produced by the Project. Disaggregated data by gender on participants in project's activities (e.g. training)	MS
5. Environmental, social and economic safeguards	Environmental and socio-economic concerns taken into account in Project Design	S
6. Country ownership and driven-ness	Below expectation among decision-makers	MU
7. Communication and public awareness	Through different activities and national surveys	HS
<b>Overall Project Performance Rating</b>	<b>Moderately Satisfactory</b>	<b>MS</b>

### C. Lessons learned

<b>Lesson Learned #1:</b>	<b>A solid institutional framework and leadership are crucial to assert Biosafety as a priority issue for Sustainable Development.</b>
<b>Context/comment:</b>	NBF implementation has proved difficult in the country, mainly due to its weak institutional anchorage and support within the Competent National Authority (Department of Environment) and at higher levels (the Ministry and the Government), as discussed in Chapter V, Section D (Achievement of Outcomes), under Institutional Sustainability (Chapter H) and in Conclusions above.

<b>Lesson Learned #2:</b>	<b>It is important to adapt project design and expected results to the baseline situation of the country, expressed needs and priorities, and to in-country real capacity of progressive national ownership and institutional up-take.</b>
<b>Context/comment:</b>	GEF/UNEP Projects of NBF Implementation follow a standard design and foresee similar results (outcomes) with little room for in-country adaptation ("one-size fits all" approach). This may hamper Project implementation and results achievement in countries with low baseline situations (see also Chapter V, Section B – Quality of Project design - and Section D – Achievement of Project Outcomes).

<b>Lesson Learned #3:</b>	<b>The preparation, discussion and approval of a Biosafety Law may prove unrealistic to be achieved during the "normal" timeframe of a Project.</b>
<b>Context/comment:</b>	Countries may have an elaborate process of Laws approval and promulgation. Socio-Political situation may also interfere heavily with the process, as discussed in chapter V, Section D – Effectiveness, regarding Outcome 2.

#### D. Recommendations

<b>Recommendation #1:</b>	<p><b>The Evaluation recommends that UNEP Project staff communicate the following recommendation to the Department of Environment - <u>to resume efforts to restore a Biosafety Coordinating Committee to draw a possible plan of action / road map including:</u></b></p> <ul style="list-style-type: none"> <li>➤ <b>Assessing current priorities and identification of realistic objectives to improve country's fulfilment of Cartagena Protocol requirements, through the gradual implementation of the National Biosafety Framework (NBF);</b></li> <li>➤ <b>Setting strong relationship with relevant Biosafety players (State and Non-state actors) in South Africa and other SADC (Southern Africa Development Community) countries and identify possible forms of joint initiatives in support of the implementation of the National Biosafety Framework (NBF) in Lesotho;</b></li> <li>➤ <b>Design of a resources mobilization strategy at National, Regional and International level (NBSAP, SADC, NEPAD - New Partnership for Africa Development of the African Union, GEF/UNEP, Bilateral Cooperation) to implement the NBF in Lesotho.</b></li> </ul>
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<b>Context/comment:</b>	<p>The Project has successfully delivered relevant outputs, but socio-political and institutional limiting factors have so far hampered the effective implementation of the NBF as described and discussed in chapter V (Section D - Achievement of Outcomes) and under Socio-political and Institutional Sustainability (Chapter H).</p> <p>Conclusions from § 135 to 137 are also approaching the issue, as well as the answer to Question (a).</p> <p>Lesson 2 also calls for appropriate initiatives tailored to in-country real capacity of progressive national ownership and institutional up-take.</p>
<b>Priority Level <sup>7</sup>:</b>	Critical Recommendation
<b>Responsibility:</b>	The Competent National Authority (Department of Environment /DoE of the Ministry of Tourism, Environment and Culture) with the support of SADC and UNEP.
<b>Proposed implementation time-frame</b>	As soon as possible

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<sup>7</sup> Select priority level from the three categories below:

*Critical recommendation: address significant and/or pervasive deficiencies in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of programme objectives.*

*Important recommendation: address reportable deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance might be at risk regarding the achievement of programme objectives. Important recommendations are followed up on an annual basis.*

*Opportunity for improvement: comprise suggestions that do not meet the criteria of either critical or important recommendations, and are only followed up as appropriate during subsequent oversight activities.*



## ANNEX 1: RESPONSE TO STAKEHOLDER COMMENTS RECEIVED BUT NOT (FULLY) ACCEPTED BY THE EVALUATOR

Table 11: Response to stakeholder comments received but not (fully) accepted by the reviewers, where appropriate

Page Ref	Stakeholder comment	Evaluator(s) Response	UNEP Evaluation Office Response
	<b>TM of UNEP</b> – Mr Alex Owusu-Biney:		
11 and 48	Rating of Sustainability: From stakeholder discussions this should be MS and is likely with the passage of the law/// Same on sustainability	The Evaluation did not find any evidence supporting increasing the rating from Moderately Unlikely (MU) to Moderately Likely (ML).	
13 and 49	On Rec. n 1: UNEP made efforts for Lesotho to join a just approved project concept to strengthen NBFs in Southern Africa. That could have been extremely helpful. Usually most countries get up speed through a follow up thematic intervention.. Unfortunately the country did not endorse the requested allocation	Noted	
38	On § 109: The design was not a fully one size fits all..i the institutional arrangements in the Development Project guided by the circumstance was changed ii. The laboratory was set up at the University which usually should not be the case, but in the peculiar circumstance that was a more plausible option, there were finer or detailed focus which was peculiar to the Kingdom's peculiar situation?	The Evaluation is criticising the "one size fits all" approach (a common feature of all Projects of Biosafety Frameworks Implementation), because it may not be suitable particularly for low-baseline countries, like Lesotho. What is questionable is the Project Design (not the institutional arrangements) and the "standard" definition of Outcomes and Outputs. See also Chapter V, Section B, § 74.	
39	On § 111 (Rating of Likelihood of Impact) Basis for the rating... the Biosafety Bill is yet to be passed by as guided they can use the environment law with the developed guidelines and manuals to decide or take decisions supported by the Cartagena Protocol which is ratified, with that in mind, it is difficult to relate to the rating, and I suggest a review	A Moderately Unsatisfactory rating of Outcomes Achievement does not realistically allow to upgrade the rating of Likelihood of Impact. It is true that decisions supported by the Cartagena Protocol could be developed through guidelines and manuals, so why did the Projects pursue the formulation and approval of a National Biosafety Law? (see previous comment on the "one size fits all" design).	
49	Regarding Lesson Learnt n.1 This is not totally correct – it is broadly to implement policy, legal, administrative and technical measure the pathways and deliverables are country driven and dependent on the country, that is why some countries utilise existing Environmental rules	This objection has already been discussed above (see ref. page 38). Though it may be true that in few cases there has been an adaptation of the expected results to the specific countries situation, that did not happen in Lesotho.	

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Page Ref	Stakeholder comment	Evaluator(s) Response	UNEP Evaluation Office Response
	etc.. or carve specific institutional frameworks etc. the key challenge to delivery was the role of high level oversight?		

## ANNEX 2: TERMS OF REFERENCE FOR THE EVALUATION

## TERMS OF REFERENCE

**Terminal Evaluation of the UNEP/GEF project  
"Implementation of National Biosafety Framework for Lesotho"  
GEF ID # 3646**

## Section 1: PROJECT BACKGROUND AND OVERVIEW

## Project General Information

Table 1. Project summary

<b>GEF Project ID:</b>	3646		
<b>Implementing Agency:</b>	UNEP	<b>Executing Agency:</b>	Ministry of Tourism, Environment and Culture - Department of Environment
<b>Sub-programme:</b>	Environmental Governance	<b>Expected Accomplishment(s):</b>	MTS 2010-2013 Expected Accomplishment (EA) (b): Institutional capacities and policy and/or legal frameworks enhanced to achieve internationally agreed environmental goals MTS 2014-2017 EA2: The capacity of countries to develop and enforce laws and strengthen institutions to achieve internationally agreed environmental objectives and goals and comply with related obligations is enhanced.
<b>UNEP approval date:</b>	July 2011	<b>Programme of Work Output(s):</b>	Policy, Draft Bill, Administrative, technical training and Technical guidelines/Manuals with an equipped LMO Detection Laboratory to support Biosafety Decision Making [Details in Project Output Summary]
<b>GEF approval date:</b>	March 2011	<b>Project type:</b>	Medium-size Project
<b>GEF Operational Programme #:</b>		<b>Focal Area(s):</b>	Biodiversity
		<b>GEF Strategic Priority:</b>	SP 6 – Biosafety/SO3
<b>Expected start date:</b>	July 2011	<b>Actual start date:</b>	November 2011
<b>Planned completion date:</b>	July 2015	<b>Actual completion date:</b>	July 2018
<b>Planned project budget at approval (USD):</b>	\$1,702,145	<b>Actual total expenditures reported as of [date]:</b>	July 2018
<b>GEF grant allocation (USD):</b>	USD \$884,806	<b>GEF grant expenditures</b>	USD \$841,356.14 <sup>8</sup>

<sup>8</sup> Anubis

		<b>reported as of [date]:</b>	
<b>Project Preparation Grant - GEF financing:</b>	N/A	<b>Project Preparation Grant - co-financing:</b>	N/A
<b>Expected Medium-Size Project co-financing:</b>	\$817,339	<b>Secured Medium-Size Project/Full-Size Project co-financing:</b>	\$817,339
<b>First disbursement:</b>	November 2011	<b>Date of financial closure:</b>	TBD
<b>No. of revisions:</b>	6 <sup>9</sup>	<b>Date of last revision:</b>	
<b>No. of Steering Committee meetings:</b>		<b>Date of last/next Steering Committee meeting:</b>	Last: Next:
<b>Mid-term Review/ Evaluation (planned date):</b>	March 2013	<b>Mid-term Review/ Evaluation (actual date):</b>	July 2013 <sup>10</sup>
<b>Terminal Evaluation (planned date):</b>	February 2020	<b>Terminal Evaluation (actual date):</b>	TBD
<b>Coverage - Country(ies):</b>	Lesotho	<b>Coverage - Region(s):</b>	Africa
<b>Dates of previous project phases:</b>	N/A	<b>Status of future project phases:</b>	N/A

### Project rationale

1. Eighty five percent (85%) of Lesotho's population is rural and their main form of livelihood is subsistence agriculture. There has been a decline in agricultural productivity since the 1990's and as such local farmers are often dependent on seed from South Africa, which may be genetically modified because of the commercialization of maize varieties. When Lesotho acceded to the Cartagena Protocol on Biosafety (CPB) in 2003, the country lacked capacity in biosafety, specifically in terms of institutional arrangements and infrastructure. As such it was unable to track transboundary movement of Living Modified Organisms (LMOs), nor did it have mechanisms in place to detect illegal traffic of LMOs, and to monitor their effects.

2. It is critical that modern biotechnology products, including LMOs, are managed so that all concerns with respect to negative impacts to human, animal and plant health and environmental safety are addressed, and plans are put in place to minimize such risks should they occur. Since 2003 Lesotho had undertaken several initiatives designed to pave the way towards the establishment of a National Biosafety System. This includes the establishment of the National Coordinating Committee (NCC) which is in the process of formulating policies and guidelines governing biotechnology. Despite this Lesotho lacked a functional biosafety framework to regulate biosafety issues in the country, and needed to institute mechanisms to regulate and support the safe handling, use and transfer of LMOs and safe Research and Development of LMOs, including contained use and deliberate release into the environment as well as into the market.

3. The need for a regulatory framework was further accentuated by the fact that Lesotho shares boundaries with South Africa which already has a regulatory framework. As such without the introduction effective regulatory measures, Lesotho cannot ensure safe transboundary movement of LMOs.

4. The National Biosafety Frameworks Implementation Project was designed to help Lesotho strengthen the existing institutional and technical structures and infrastructures needed to meet the obligations of the CPB and develop an operational National Biosafety Framework (NBF). The establishment of a National Biosafety Framework also supports Lesotho's national priorities and goals which focus on enhancing economic growth and poverty reduction. Lesotho has also enshrined environmental conservation in the

<sup>9</sup> Anubis

<sup>10</sup> PIR FY 2013 in lieu of Mid Term Review

Constitution and has an Environment Policy and Environment Act of 2001. The project was a direct follow up to the 2003 UNEP-GEF "Development of National Biosafety Project". This project built on the baseline achieved by the previous project by putting in place a fully operational biosafety framework in Lesotho which was designed to assist the country to address and regulate intentional transboundary movement, and in-country use of LMOs. This will help to achieve the environmental goals of the CPB and protect Lesotho's rich biological diversity which includes ecosystems with biological hotspots, consisting of endemic and rare species which are of global significance.

### Project objectives and components

5. The project's main objective was to develop a workable and transparent National Biosafety Framework, for the benefit of the people and the environment of Lesotho, that was in line with Lesotho's national development priorities and ensured consistency with the provisions of the CPB.

Specific Objectives of the project (represented as 'Components' in the results table below):

- To assist the Government of Lesotho to integrate Biosafety and Biotechnology into its' national development plans
- To establish a fully functional and responsive regulatory regime in line with the CPB and national needs on biosafety
- To have a fully functional national system for handling requests and applications
- To set up a system for monitoring environmental effects and enforcement mechanisms for biosafety in Lesotho
- To establish fully functional systems for: public awareness and education; public participation in decision-making; access to information

TABLE 1: Table of Components, Outcomes and Outputs

<b>COMPONENT 1 To assist the Government of Lesotho to integrate Biosafety and Biotechnology into its national development plans.</b>	
<b>Outcomes</b>	1.1. Biotechnology and biosafety recognized as a sustainable development issue in PRS, NBSAP, NEAP, Biotechnology and Biosafety Strategies and Action Plans. 1.2. Enabling mechanisms to adapt policies to changing needs prepared
<b>Outputs</b>	<ul style="list-style-type: none"> <li>➤ Stocktaking and inventory report</li> <li>➤ Policy document on biosafety issues, relevance and mainstreaming approaches into relevant national plans and programmes</li> </ul>

<b>COMPONENT 2: To establish a fully functional and responsive regulatory regime in line with CP and national needs on biosafety</b>	
<b>Outcomes</b>	2.1 Regulatory regime that is consistent with CP and other domestic and international obligations in place. 2.2. Application and enforcement of the regulatory regime

<b>Outputs</b>	<ul style="list-style-type: none"> <li>➤ Biosafety Bill promulgated as an Act of Parliament Revocation and cessation orders published</li> </ul>
<b>COMPONENT 3: To have a fully functional national system for handling requests and applications.</b>	
<b>Outcomes</b>	<p>3.1. Establishment of a fully functional and workable system for handling applications, risk assessment and management, and decision making</p> <p>3.2. A fully functional administrative system established</p>
<b>Outputs</b>	<ul style="list-style-type: none"> <li>➤ Set of procedures for handling requests including permit and application forms developed</li> <li>➤ Risk Assessment guidelines made operational with “check lists” developed for applicants and reviewers</li> <li>➤ Two national workshops held on Risk Assessment/management and decision makers for the NBA, related agencies and applicants</li> </ul>
<b>COMPONENT 4: To set up a system for monitoring environmental effects and enforcement mechanisms for biosafety in Lesotho</b>	
<b>Outcomes</b>	4.1. Mechanism for monitoring environmental effects and enforcement mechanisms developed
<b>Outputs</b>	<ul style="list-style-type: none"> <li>➤ Institutional roles and responsibilities for the proposed monitoring and enforcement system established through Memorandum of Understanding (MOUs)</li> <li>➤ Methodologies for monitoring the environmental effects/ risks associated with LMOs handling, transport, use, transfer and release developed</li> <li>➤ 3 workshops on monitoring and enforcement, and 2 Courses on LMO Detection held.</li> <li>➤ Laboratory facilities developed and utilised for LMOs detection by the National Biosafety Authority, Research Institutions, Universities, Regulatory Agencies and other relevant stakeholders identified.</li> <li>➤ 10 – 20 Technicians from relevant ministries, departments and agencies trained and enabled to carry out laboratory inspection activities.</li> <li>➤ Inspection and emergency procedure manuals developed in collaboration with countries in the region for cooperative initiatives.</li> </ul>

**COMPONENT 5:**

**To establish fully functional systems for Public awareness and education, Public participation in decision-making and Access to information**

<b>Outcomes</b>	<p>5.1 Strengthened system for public awareness and education</p> <p>5.2 Regulatory regime published and made accessible to all stakeholders</p> <p>5.3 A functional national system for access and sharing of information.</p>
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	5.4 Strengthened public participation to facilitate decision-making
<b>Outputs</b>	<ul style="list-style-type: none"> <li>➤ Public Communication Strategy developed</li> <li>➤ Coalition of advocacy groups established</li> <li>➤ Different stakeholders, including media and the public, trained on public information and participation related issues.</li> <li>➤ An interactive biosafety database established, accessible to the public and linked to the National Biosafety Clearing House (nBCH)</li> <li>➤ Clearly defined entry points for public participation in decision-making process for LMOs.</li> </ul>

### Executing Arrangements

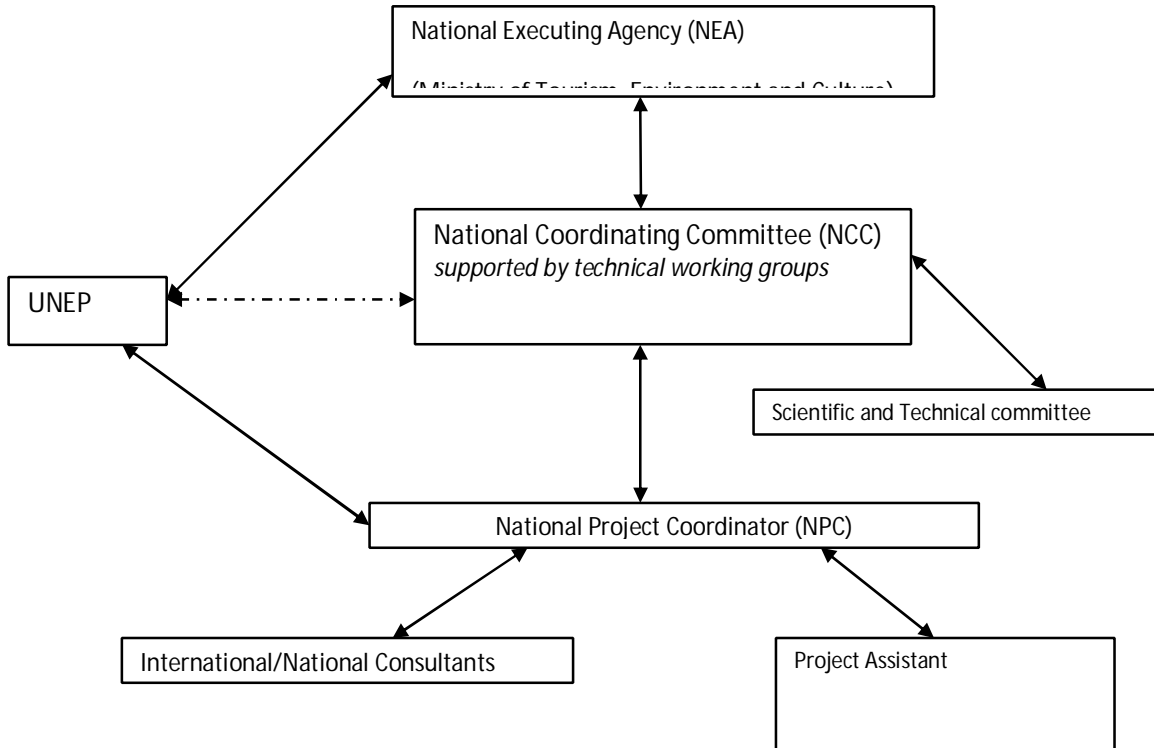
6. The GEF **Implementing Agency** for this project was UN Environment Programme (UNEP), under the Ecosystems Division. UNEP was responsible for overall project oversight vis-à-vis the GEF. The Division was to support project partners to ensure that the project met its stated objectives, operated according to the required UNEP/GEF standards, and that its outcomes were aligned with global biosafety policy - in particular with the CPB.

7. The Department of Environment of the Ministry of Tourism, Environment and Culture (MoTEC) was designated as the National Executing Agency (NEA). It was to act as the legal entity to execute the project on behalf of the government of Lesotho. The NEA was to provide the necessary scientific, technical, financial and administrative support to the work of the National Coordinating Committee (NCC), working in close co-operation with relevant government agencies, the scientific community and the public and private sectors.

8. The NCC was to be established by MoTEC to advise and guide the implementation of the NBF. This committee was to include representations of all government agencies with mandates relevant to the Cartagena Protocol on Biosafety and representations from the private and public sectors. This Committee was designed to be multi-disciplinary and multi-sectoral in fields relevant to the Cartagena Protocol on Biosafety.

9. The National Project Coordinator (NPC) was to be appointed by the NEA, after consultation with UNEP, for the duration of the Project. The NPC role was designed to be responsible for the overall co-ordination, management and supervision of all aspects of the National Project. The NPC was intended to report to the NCC and UNEP and to liaise closely with the chair and members of the NCC and NEA in order to coordinate the work plan for the National Project. The NPC role was also intended to be responsible for all substantive, managerial and financial reports from the National Project. The NPC role was also expected to provide overall supervision for any staff in the NBF Team as well as guiding and supervising all other staff appointed for the execution of National Project components.

**Figure 1. Decision making flowchart and organigram**



NCC – National Coordination Committee  
 NEA – National Executing Agency  
 NPC – National Project Coordinator

### Project Cost and Financing

10. The project falls under the medium-sized project category. The overall project budget was USD 1,702,145 comprising USD 884,806 from GEF and USD 817,339 in co-financing from the Government of Lesotho. The detailed budget according to the UNEP format and by activities can be found in the Project Document Appendices: 1 and 2.

11. The GEF contribution and Government co-financing are summarised in the table below in USD:

	Project Preparation	Project	Agency Fee	Total
GEF	0	\$884,806	\$88,480	\$973,286
Co-financing	0	\$817,339		\$817,339
Total	0	\$1,702,145	\$88,480	\$1,790,625

### Implementation Issues

12. The PIR 2018 highlights 6 revisions and three extensions based on the request of the Partner (extensions were guided by communications received – Letters for Project Extension as in ANUBIS). The reasons include un planned staff movements, long and winding procurement process, delays in receiving the project grants from the Central Government among others. The budget revisions are standard UNEP annual revisions to enable movement of funds to the next year. Whilst the two extensions also required milestone extensions which also comes with a budget revision as a standard practice.

## Section 2. OBJECTIVE AND SCOPE OF THE EVALUATION

### Key Evaluation principles

13. 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.

14. **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 consultants' minds all through the evaluation exercise and is supported by the use of a theory of change approach. This means that the consultant(s) needs 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.

15. **Baselines and counterfactuals.** In attempting to attribute any outcomes and impacts to the project intervention, the consultant(s) 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.

16. **Communicating evaluation results.** A key aim of the evaluation is to encourage reflection and learning by UNEP staff and key project stakeholders. The consultant(s) 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 Manager. There may, however, be several intended audiences, each with different interests and needs regarding the report. The Evaluation Manager will plan with the consultant(s) which audiences to target and the easiest and clearest way to communicate the key evaluation findings and lessons to them. This may include some, or all, of the following: a webinar, conference calls with relevant stakeholders, the preparation of an evaluation brief or interactive presentation.

### Objective of the Evaluation

17. In line with the UNEP Evaluation Policy<sup>11</sup> and the UNEP Programme Manual<sup>12</sup>, the Terminal Evaluation is undertaken at completion of the project to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote operational improvement, learning and knowledge sharing through results and lessons learned among UNEP and Ministry of Tourism, Environment and Culture. Therefore, the evaluation will identify lessons of operational relevance for future project formulation and implementation, especially for the second phase of the project, where applicable.

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<sup>11</sup> <http://www.unep.org/eou/StandardsPolicyandPractices/UNEPEvaluationPolicy/tabid/3050/language/en-US/Default.aspx>

<sup>12</sup> [http://www.unep.org/QAS/Documents/UNEP\\_Programme\\_Manual\\_May\\_2013.pdf](http://www.unep.org/QAS/Documents/UNEP_Programme_Manual_May_2013.pdf) . This manual is under revision.

### Key Strategic Questions

18. In addition to the evaluation criteria outlined in Section 10 below, the evaluation will address the **strategic questions** listed below. These are questions of interest to UNEP and to which the project is believed to be able to make a substantive contribution:

- (a) To what extent did the project help to enhance national institutional and technical capacity and awareness amongst the key actors for effective enforcement of the Biosafety Law, decrees and sub-decrees on biosafety?
- (b) To what extent are the outcome indicators verifiable, and record progresses towards the achievement of the development objectives, as well as the obligations under the Cartagena Protocol?

### Evaluation Criteria

19. 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 availability 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(s) can propose other evaluation criteria as deemed appropriate.

### Strategic Relevance

20. The evaluation will assess '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 UNEP's mandate and its alignment with UNEP'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 UNEP Medium Term Strategy<sup>13</sup> (MTS) and Programme of Work (POW)

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

- ii. Alignment to UNEP / Donor/GEF Strategic Priorities

22. Donor, including GEF, strategic priorities will vary across interventions. UNEP strategic priorities include the Bali Strategic Plan for Technology Support and Capacity Building<sup>14</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.

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<sup>13</sup> UNEP's Medium Term Strategy (MTS) is a document that guides UNEP's programme planning over a four-year period. It identifies UNEP's thematic priorities, known as Sub-programmes (SP), and sets out the desired outcomes, known as Expected Accomplishments (EAs), of the Sub-programmes.

<sup>14</sup> <http://www.unep.org/GC/GC23/documents/GC23-6-add-1.pdf>

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

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

iv. Complementarity with Existing Interventions

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

## A. Quality of Project Design

25. 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 ([www.unep.org/evaluation](http://www.unep.org/evaluation)). This overall Project Design Quality rating is entered in the final evaluation ratings table as item B. In the Main Evaluation Report a summary of the project's strengths and weaknesses at design stage is included, while the complete Project Design Quality template is annexed in the Inception Report.

Factors affecting this criterion may include (at the design stage):

- Stakeholders participation and cooperation
- Responsiveness to human rights and gender equity

## C. Nature of External Context

26. 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 external operating context, and/or a negative external event has occurred during project implementation, the ratings for Effectiveness, Efficiency and/or Sustainability may be increased at the discretion of the evaluation consultant and Evaluation Manager together. A justification for such an increase must be given.

## D. Effectiveness

### i. Availability of Outputs<sup>15</sup>

27. The evaluation will assess the project's success in producing the programmed outputs 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, reformulations may be necessary in the reconstruction of the TOC. In such cases a table should be provided showing the original and the reformulation of the outputs for transparency. The availability of outputs will be assessed in terms of both quantity and quality, and the assessment will consider their ownership by, and usefulness to, intended beneficiaries and the timeliness of their provision. The evaluation will briefly explain the reasons behind the success or shortcomings of the project in delivering its programmed outputs and meeting expected quality standards.

Factors affecting this criterion may include:

- Preparation and readiness
- Quality of project management and supervision<sup>16</sup>

### ii. Achievement of Project Outcomes<sup>17</sup>

28. The achievement of project outcomes is assessed as performance against the project outcomes as defined in the reconstructed<sup>18</sup> Theory of Change. These are outcomes that are intended to be achieved by the end of the project timeframe and within the project's resource envelope. As with outputs, a table can be used where substantive amendments to the formulation of project outcomes is necessary. The evaluation should report evidence of attribution between UNEP's intervention and the project outcomes. In cases of normative work or where several actors are collaborating to achieve common outcomes, evidence of the nature and magnitude of UNEP's 'substantive contribution' should be included and/or 'credible association' established between project efforts and the project outcomes realised.

Factors affecting this criterion may include:

- Quality of project management and supervision
- Stakeholders' participation and cooperation
- Responsiveness to human rights and gender equity

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<sup>15</sup> Outputs are the availability (for intended beneficiaries/users) of new products and services and/or gains in knowledge, abilities and awareness of individuals or within institutions (UNEP, 2019)

<sup>16</sup> In some cases 'project management and supervision' will refer to the supervision and guidance provided by UNEP 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 UNEP.

<sup>17</sup> Outcomes are the use (i.e. uptake, adoption, application) of an output by intended beneficiaries, observed as changes in institutions or behavior, attitude or condition (UNEP, 2019)

<sup>18</sup> UNEP 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.

- Communication and public awareness

### iii. Likelihood of Impact

29. Based on the articulation of long-lasting effects in the reconstructed TOC (i.e. from project outcomes, via intermediate states, to impact), the evaluation will assess the likelihood of the intended, positive impacts becoming a reality. Project objectives or goals should be incorporated in the TOC, possibly as intermediate states or long-lasting impacts. The Evaluation Office's approach to the use of TOC in project evaluations is outlined in a guidance note available on the Evaluation Office website, <https://www.unenvironment.org/about-un-environment/evaluation> and is supported by an excel-based flow chart, 'Likelihood of Impact Assessment Decision Tree'. Essentially the approach follows a 'likelihood tree' from project 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.

30. The evaluation will also consider the likelihood that the intervention may lead, or contribute to, unintended negative effects. Some of these potential negative effects may have been identified in the project design as risks or as part of the analysis of Environmental, Social and Economic Safeguards.<sup>19</sup>

31. The evaluation will consider the extent to which the project has played a catalytic role or has promoted scaling up and/or replication<sup>20</sup> as part of its Theory of Change and as factors that are likely to contribute to longer term impact.

32. UNEP 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 UNEP's Expected Accomplishments, the Sustainable Development Goals<sup>21</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 management)
- Stakeholders participation and cooperation
- Responsiveness to human rights and gender equity
- Country ownership and driven-ness
- Communication and public awareness

## E. Financial Management

33. Financial management will be assessed under two themes: completeness of financial information and communication between financial and project management staff. 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 Project/Task Manager and the Fund Management Officer as it relates to the

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<sup>19</sup> Further information on Environmental, Social and Economic Safeguards (ESES) can be found at <http://www.unep.org/about/eses>

<sup>20</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>21</sup> A list of relevant SDGs is available on the EO website [www.unep.org/evaluation](http://www.unep.org/evaluation)

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 UNEP'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
- Quality of project management and supervision

## **F. Efficiency**

34. The evaluation will assess the extent to which the project delivered maximum results from the given resources. This will include an assessment of the cost-effectiveness and timeliness of project execution. Focussing on the translation of inputs into outputs, cost-effectiveness is the extent to which an intervention has achieved, or is expected to achieve, its results at the lowest possible cost. Timeliness refers to whether planned activities were delivered according to expected timeframes as well as whether events were sequenced efficiently. The evaluation will also assess to what extent any project extension could have been avoided through stronger project management and identify any negative impacts caused by project delays or extensions. The evaluation will describe any cost or time-saving measures put in place to maximise results within the secured budget and agreed project timeframe and consider whether the project was implemented in the most efficient way compared to alternative interventions or approaches. The evaluation will give special attention to efforts by the project teams to make use of/build upon pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc. to increase project efficiency. The evaluation will also consider the extent to which the management of the project minimised UNEP's environmental footprint. The factors underpinning the need for any project extensions will also be explored and discussed. As management or project support costs cannot be increased in cases of 'no cost extensions', such extensions represent an increase in unstated costs to implementing parties.

Factors affecting this criterion may include:

- Preparation and readiness (e.g. timeliness)
- Quality of project management and supervision
- Stakeholders participation and cooperation

## **G. Monitoring and Reporting**

35. 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**

36. Each project should be supported by a sound monitoring plan that is designed to track progress against SMART<sup>22</sup> indicators towards the provision of the project's outputs and achievement of project outcomes, including at a level disaggregated by gender, vulnerability or marginalisation. 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 of Project Implementation**

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<sup>22</sup> SMART refers to indicators that are specific, measurable, assignable, realistic and time-specific.



37. The evaluation will assess whether the monitoring system was operational and facilitated the timely tracking of results and progress towards projects objectives throughout the project implementation period. This should include monitoring the representation and participation of disaggregated groups (including gendered, vulnerable and marginalised groups) in project activities. 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

38. UNEP has a centralised Project Information Management System (PIMS) in which project managers upload six-monthly status reports against agreed project milestones. This information will be provided to the Evaluation Consultant(s) by the Evaluation Manager. Some projects have additional requirements to report regularly to funding partners, which will be supplied by the project team (e.g. the Project Implementation Reviews and Tracking Tool for GEF-funded projects). The evaluation will assess the extent to which both UNEP and donor reporting commitments have been fulfilled. Consideration will be given as to whether reporting has been carried out with respect to the effects of the initiative on disaggregated groups.

Factors affecting this criterion may include:

- Quality of project management and supervision
- Responsiveness to human rights and gender equity (e.g disaggregated indicators and data)

## H. Sustainability

39. Sustainability is understood as the probability of project 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 project outcomes (ie. 'assumptions' and 'drivers'). 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 project outcomes may also be included.

### i. Socio-political Sustainability

40. The evaluation will assess the extent to which social or political factors support the continuation and further development of project 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

41. Some project 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 project 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 project outcomes of a project have been extended into a future project phase. Even where future funding has been secured, the question still remains as to whether the project outcomes are financially sustainable.

### iii. Institutional Sustainability

42. The evaluation will assess the extent to which the sustainability of project outcomes (especially those relating to policies and laws) 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. In particular, the evaluation will consider whether institutional capacity development efforts are likely to be sustained.

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
- Country ownership and driven-ness

## **I. Factors and Processes Affecting Project Performance**

(These factors are rated in the ratings table, but are discussed within the Main Evaluation Report as cross-cutting themes as appropriate under the other evaluation criteria, above. Where the issues have not been addressed under other evaluation criteria, the consultant(s) will provide summary sections under the following headings.)

### **i. Preparation and Readiness**

43. This criterion focuses on the inception or mobilisation stage of the project (ie. the time between project approval and first disbursement). 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 included in the template for the assessment of Project Design Quality).

### **ii. Quality of Project Management and Supervision**

44. In some cases 'project management and supervision' will refer to the supervision and guidance provided by UNEP 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 UNEP.

45. 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 UNEP colleagues; risk management; use of problem-solving; project adaptation and overall project execution. Evidence of adaptive management should be highlighted.

### **iii. Stakeholder Participation and Cooperation**

46. 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 UNEP. 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**

47. 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 UNEP's Policy and Strategy for Gender Equality and the Environment.

48. In particular the evaluation will consider to what extent project design, implementation and monitoring 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; and (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**

49. The evaluation will assess the quality and degree of engagement of government / public sector agencies in the project. While there is some overlap between Country Ownership and Institutional Sustainability, this criterion focuses primarily on the forward momentum of the intended projects results, ie. either a) moving forwards from outputs to project outcomes or b) moving forward from project outcomes towards intermediate states. 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 of interest of all gendered and marginalised groups.

**vi. Communication and Public Awareness**

50. 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 gendered or marginalised groups, and whether any feedback channels were established. Where knowledge sharing platforms have been established under a project the evaluation will comment on the sustainability of the communication channel under either socio-political, institutional or financial sustainability, as appropriate.

### **Section 3. EVALUATION APPROACH, METHODS AND DELIVERABLES**

51. The Terminal Evaluation will be an in-depth evaluation using a participatory approach whereby key stakeholders are kept informed and consulted throughout the evaluation process. Both quantitative and qualitative evaluation methods will be used as appropriate to determine project achievements against the expected outputs, outcomes and impacts. It is highly recommended that the consultant(s) maintains close communication with the project team and promotes information exchange throughout the evaluation implementation phase in order to increase their (and other stakeholder) ownership of the evaluation findings. Where applicable, the consultant(s) should provide a geo-referenced map that demarcates the area covered by the project and, where possible, provide geo-reference photographs of key intervention sites (e.g. sites of habitat rehabilitation and protection, pollution treatment infrastructure, etc.)

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

(a) **A desk review of:**

- Relevant background documentation inter alia UNEP, SCBD 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 as listed in the results framework:

- Mid-Term Review or Mid-Term Evaluation of the project (if one was undertaken);
- Evaluations/reviews of similar projects.

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

- UNEP Task Manager (TM) - Alex Owusu-Biney;
- Project management team, including the Project Manager within the Executing Agency;
- UNEP Fund Management Officer (FMO) - Martin Okun;
- Portfolio Manager (Johan Robinsion) and Sub-Programme Coordinator, Yassin Ahmed (Environment Governance Sub-Programme), Marieta Sakalian (Healthy and Productive Ecosystem);
- Project partners, including the Ministry of Tourism, Environment and Culture
- Relevant resource persons.

(c) **Surveys**, where applicable

(d) **Other data collection tools** as may be deemed useful for evaluation by the consultant

### **Evaluation Deliverables and Review Procedures**

52. The evaluation team will prepare:

- **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.
- **Preliminary Findings Note:** Typically in the form of a PowerPoint presentation, the sharing of preliminary findings is intended to support the participation of the project team, act as a means to ensure all information sources have been accessed and provide an opportunity to verify emerging findings. In the case of highly strategic project/portfolio evaluations or evaluations with an Evaluation Reference Group, the preliminary findings may be presented as a word document for review and comment.
- **Draft and Final Evaluation Report:** (see links in Annex 1) containing an executive summary that can act as a stand-alone document; detailed analysis of the evaluation findings organised by evaluation criteria and supported with evidence; lessons learned and recommendations and an annotated ratings table.
- **Evaluation Bulletin:** a 2-page summary of key evaluation findings for wider dissemination through the EOU website.

53. **Review of the draft evaluation report.** The evaluation team will submit a draft report to the Evaluation Manager and revise the draft in response to their comments and suggestions. Once a draft of adequate quality has been peer-reviewed and accepted, the Evaluation Manager will share the cleared draft report with the Task Manager and Project Manager, who will alert the Evaluation Manager in case the report contains any blatant factual errors. The Evaluation Manager will then forward revised draft report (corrected by the evaluation consultant(s) where necessary) to other project stakeholders, for their review and comments. Stakeholders may provide feedback on any errors of fact and may highlight the significance of such errors in any conclusions as well as providing feedback on the proposed recommendations and lessons. Any comments or

responses to draft reports will be sent to the Evaluation Manager for consolidation. The Evaluation Manager will provide all comments to the evaluation consultant(s) for consideration in preparing the final report, along with guidance on areas of contradiction or issues requiring an institutional response.

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

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

56. 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.

### **Evaluation Consultant**

57. For this evaluation one consultant will work under the overall responsibility of the Evaluation Office represented by an Evaluation Manager (Myles Hallin) in consultation with the UNEP Task Manager (Alex Owusu-Biney), Fund Management Officer (Martin Okun) and the Sub-programme Coordinators of the Environment Governance Sub programme (Yassin Ahmed) and the Healthy and Productive Ecosystem Sub programme (Marieta Sakalian). The consultant will liaise with the Evaluation Manager on any procedural and methodological matters related to the evaluation. It is, however, each consultant's individual responsibility to plan meetings with stakeholders, organize online surveys, obtain documentary evidence and any other logistical matters related to the assignment. The UNEP Task Manager and project team will, where possible, provide logistical support (introductions, meetings etc.) allowing the consultants to conduct the evaluation as efficiently and independently as possible.

58. The consultant will be hired for 9 months spread over the period February 2020 to October 2020 and should have: an advanced university degree in environmental sciences, or another relevant political or social sciences area; evaluation experience, preferably using a Theory of Change approach; a minimum of 15 years; experience in environmental management or a related field, with a preference for specific expertise in the area of biosafety and biodiversity. English and French are the working languages of the United Nations Secretariat. For this consultancy, fluency in oral and written English is a requirement, along with excellent writing skills in English. Working knowledge of the UN system and specifically the work of UNEP is an added advantage. The work will be home-based.

59. The consultant will be responsible, in close consultation with the Evaluation Office of UNEP for overall management of the evaluation and timely provision of its outputs, described above in Section 11 Evaluation Deliverables, above. The consultant will make substantive and high-quality contributions to the evaluation process and outputs. The consultant will ensure that all evaluation criteria and questions are adequately covered.

60. In close consultation with the Evaluation Manager, the evaluation consultant will be responsible for the overall management of the evaluation and timely provision of its outputs, data collection and analysis and report-writing. More specifically:

**Inception phase** of the evaluation, including:

- preliminary desk review and introductory interviews with project staff;
- draft the reconstructed Theory of Change of the project;
- prepare the evaluation framework;
- develop the desk review and interview protocols;
- draft the survey protocols (if relevant);
- develop and present criteria for country and/or site selection for the evaluation mission;

- plan the evaluation schedule;
- prepare the Inception Report, incorporating comments until approved by the Evaluation Manager

**Data collection and analysis phase** of the evaluation, including:

- Conduct a desk review and in-depth interviews with project implementing and executing agencies, project partners and project stakeholders;
- Ensure independence of the evaluation and confidentiality of evaluation interviews.
- regularly report back to the Evaluation Manager on progress and inform of any possible problems or issues encountered and;
- Keep the Project/Task Manager informed of the evaluation progress and engage the Project/Task Manager in discussions on emerging findings throughout the evaluation process.

**Reporting phase**, including:

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

**Managing relations**, including:

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

### Schedule of the evaluation

61. The table below presents the tentative schedule for the evaluation.

**Table 3. Tentative schedule for the evaluation**

Milestone	Tentative Dates
Inception Report	March 2020
Desk based review and telephone interviews, surveys etc.	April/May 2020
PowerPoint/presentation on preliminary findings and recommendations	June 2020
Draft report to Evaluation Manager (and Peer Reviewer)	June/July 2020
Draft Report shared with UNEP Task Manager and team	July 2020
Draft Report shared with wider group of stakeholders	August 2020
Final Report	September/October 2020
Final Report shared with all respondents	October/November 2020

### Contractual Arrangements

62. Evaluation consultants will be selected and recruited by the Evaluation Office of UNEP under an individual Special Service Agreement (SSA) on a "fees only" basis (see below). By signing the service contract with UNEP /UNON, the consultant(s) 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.

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

**Schedule of Payment for the Consultant:**

<b>Deliverable</b>	<b>Percentage Payment</b>
Approved Inception Report (as per annex document 7)	30%
Approved Draft Main Evaluation Report (as per annex document 13)	40%
Approved Final Main Evaluation Report	30%

64. Fees only contracts: Air tickets will be purchased by UNEP and 75% of the Daily Subsistence Allowance 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 Manager and on the production of acceptable receipts. Terminal expenses and residual DSA entitlements (25%) will be paid after mission completion.

65. The consultants may be provided with access to UNEP's Programme Information Management System (PIMS) and if such access is granted, the consultants agree not to disclose information from that system to third parties beyond information required for, and included in, the evaluation report.

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

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

ANNEX 3: LIST OF PEOPLE MET
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**Due to COVID-19 pandemic, the country visit did not take place. Communication and exchange of information took place through e-mails or / and skype with following people:**

NAME	POSITION & INSTITUTION
Mr Stanley Damane <a href="mailto:stanleydamane@gmail.com">stanleydamane@gmail.com</a>	National Project Director / Department of Environment, Min. of Tourism, Environment and Culture
Mr Maboi Mahula <a href="mailto:maboi.mahula@gmail.com">maboi.mahula@gmail.com</a>	Project Coordinator / Department of Environment, Min. of Tourism, Environment and Culture
Mr Gerard Mahloane <a href="mailto:grmahloane@gmail.com">grmahloane@gmail.com</a>	Former Chairman of the Project Steering Committee / Director Of Theriogenology at Department of Livestock Services / Min of Agriculture



## ANNEX 4: LIST OF DOCUMENTS CONSULTED

### Project:

- Terms of Reference of the Terminal Evaluation (2020)
- Evaluation Criteria and Ratings Table (UNEP, 2019)
- Use of Theory of Change in project evaluations (UNEP, 2016)
- ROTI - Review of Outcomes to Impact: Practitioners Handbook, 2009, GEF
- Project Document "Implementation of National Biosafety Framework for Lesotho" and its Annexes (in Anubis)
- From Anubis:
  - PIRs 2015, 2016, 2017 and 2018
  - Tracking Tools (Initial, Mid-term and Final)
  - Eight (8) Budget Revisions
  - Two Steering Committee minutes
  - Technical reports, Audit Reports, etc.

### Global:

- Cartagena Protocol on Biosafety (CPB)
- Nagoya – Kuala Lumpur Supplementary Protocol on Liability and Redress to the Cartagena Protocol on Biosafety
- Proposed biennial programme of work and budget for 2012–2013
- Bali Strategic Plan for Technology Support and Capacity- building
- Status of capacity-building activities, UNEP/CBD/BS/COP-MOP/5/INF/9, September 2010
- UNEP Medium-term Strategy 2010–2013, "Environment for Development"
- Strategic plan of CPB 2011-20
- A Comparative Analysis of Experiences and Lessons from the UNEP-GEF Biosafety Projects, 2006, UNEP-GEF Biosafety Unit
- Guidance towards Implementation of National Biosafety Frameworks: Lessons Learned from the UNEP Demonstration Projects, 2008, UNEP-GEF Biosafety Unit
- Learning from experience, the global UNEP-GEF BCH Capacity building project, 2008, UNEP-GEF
- Public Participation and the Cartagena Protocol on Biosafety, A review for DfID and UNEP-GEF (IDS)
- An Explanatory Guide to the Cartagena Protocol on Biosafety, IUCN, 2003
- Genetically Modified Organisms and Biosafety: A background paper for decision-makers and others to assist in consideration of GMO issues, IUCN, 2004

### **c) Websites to be consulted during the main evaluation phase**

- <http://www.unep.org/evaluation/>
- <https://bch.cbd.int/about/countryprofile.shtml?country=ls>
- <https://www.thegef.org/project/bs-support-implementation-national-biosafety-framework-lesotho>
- <http://environment.gov.ls/biosafety/default.php>
- <http://lestimes.com/concerns-over-dearth-of-biosafety-regulations/>
- <https://www.cbd.int/doc/nr/nr-06/ls-nr-06-en.pdf> (6th report CBD/2019)

## ANNEX 5: LIST OF ACTIVITIES / OUTPUT

- The following Table is extracted from the Terminal Report of the Project (uploaded into ANUBIS on July 2018 and accepted by the UNEP Task Manager).

- During the evaluation, key activities have been discussed with the Project Coordinator and the most relevant are described and discussed in the Evaluation Report (chapter V, Section D - Availability of Outputs).

Activities/Outputs (as listed in the project document)	Status (complete/ongoing)	Results / Impact (measured against the performance indicators stated in the project document)
<b>Output 1: Policy Integration</b>		
Stocktaking analysis report	Completed	Policy document developed on biosafety issues mainstreaming into relevant national plans and programmes
Biosafety priority needs workshops report		
<b>Output 2: Establishment of a fully functional and national needs on biosafety responsive regulatory regime in line with Cartagena Protocol</b>		
Biosafety Bill 2018	Completed	Regulatory Tools developed for national regulation of LMO activities
Biosafety Regulations writing instructions		
Suspension and Revocation Order for cases of non-compliance		
Identification of public concerns about regulatory matters		
Study tour to South Africa	Completed	A study tour for members of the regulatory institution and members of the National Coordination Committee was undertaken to the Republic of South Africa
Technical training manuals on enforcement of biosafety regulatory regime in Lesotho	Completed	Technical training manuals for "enforcement of biosafety regulatory regime" prepared
Training of personnel on inspection of genetically modified organisms activities in Lesotho	Completed	Inspection skills enhanced through training of 34 inspectors from relevant institutions (Environment, Health, Police, Customs, Agriculture, non-Governmental Organisations, Trade) on LMO inspection activities
<b>Output 3: Establishment of a fully functional national system for handling requests and applications</b>		
Manual for handling requests and applications of genetically modified organism in Lesotho.	Completed	Procedural Manuals "for handling requests and applications" prepared for use by the regulator and applicants

Guidelines for risk assessment and risk management of genetically modified organisms in Lesotho.	Completed	Procedural Guidelines "for risk assessment and risk management of genetically modified organisms in Lesotho" prepared for use by the regulator
Training of personnel on risk assessment and risk management of genetically modified organisms in Lesotho	Completed	"Risk assessment and risk management of genetically modified organisms in Lesotho" skills enhanced through one training workshop for personnel from relevant institutions
Training of personnel on handling requests and applications of genetically modified organisms in Lesotho.	Completed	"Handling applications" skills enhanced through one training workshop for personnel from relevant institutions
Laboratories assessment report	Completed	Minimum level of competence in the designated LMO testing achieved to make informed decisions
Memorandum of Understanding between Ministry of Tourism, Environment and Culture and National University of Lesotho on Management and Control of risks associated with the use and release of living modified organisms		
Setting up necessary facilities for LMO detection		
Training of national scientist on LMO detection	Completed	Biosafety decision making process enhanced through one hands-on training on LMO detection organized for national scientists
National workshops report on emergency response measures	Completed	Nine consultative workshops conducted for District Disaster Management Teams on emergency response measures on activities on LMO
Training of personnel on emergency response, accidental release, illegal movement, transit, contained use, advance informed agreement procedure, food, feed or processing procedures, handling, packaging, and transport of genetically modified organisms in Lesotho	Completed	"Emergency response, accidental release, illegal movement, transit, contained use, advance informed agreement procedure, food, feed or processing procedures, handling, packaging, and transport of genetically modified organisms in Lesotho" skills enhanced through one training workshop for personnel from relevant institutions
Guidelines for emergency response, accidental release, illegal movement, transit, contained use, advance informed agreement procedure, food, feed or processing procedures, handling, packaging, and transport of genetically modified organisms in Lesotho	Completed	Procedural Guidelines "for emergency response, accidental release, illegal movement, transit, contained use, advance informed agreement procedure, food, feed or processing procedures, handling, packaging, and transport of genetically modified organisms in Lesotho" prepared for use by the regulator

Guidelines for socio-economic issues to consider in decision-making of genetically modified organisms	Completed	Procedural Guidelines "for socio-economic issues to consider in decision-making of genetically modified organisms" prepared
Training on socio-economic issues to consider in decision-making of genetically modified organisms	Completed	"Socio-economic issues to consider in decision making of genetically modified organism" skills enhanced through one training workshop for personnel from relevant institutions
Procedures for Review of Decisions	Completed	Procedural Manuals "for reviewing decisions" prepared for use by the regulator and applicants or permitholders
<b>Output 4: System for monitoring environmental effects and enforcement mechanisms for biosafety in Lesotho</b>		
Guidelines for monitoring environmental effects of genetically modified organisms in Lesotho	Completed	Procedural Guidelines "for monitoring environmental effects of genetically modified organisms in Lesotho" prepare for use by the regulator
Training of personnel on monitoring environmental effects of genetically modified organisms in Lesotho	Completed	"Monitoring of environmental effects of genetically modified organisms" skills enhanced through one training workshop for personnel from relevant institutions
Guidelines for enforcement of licensing conditions	Completed	Procedural Guidelines "for enforcement of licensing conditions" prepared for use by the regulator
<b>Output 5: To establish fully functional systems for decision-making and access to information public awareness and education, public participation</b>		
National Biotechnology and Biosafety Awareness Strategy 2012– 2017	Completed	National Biotechnology and Biosafety Strategy 2012-2017 prepared for use for awareness raising initiatives
Report on training of biosafety awareness task team	Completed	Personnel trained on the implementation of the National Biotechnology and Biosafety Strategy 2012 — 2017
Customs and Border Control Officers' training on multilateral environmental agreements	Completed	Biosafety campaign conducted for customs and border control officers on "transboundary inspection and enforcement of activities of LMOs"
Civil Society Organisations' training On public access to information and participation in decision-making on approval of living modified organism	Completed	Biosafety campaign conducted for civil society organisations on "public participation and the decision making process of living modified organisms"

Workshop for media practitioners on effective communication of biotechnology and biosafety and the decision-making process on genetically modified organism	Completed	Biosafety campaign conducted for media practitioners on "communication biotechnology and biosafety and the decision making process of living modified organisms"
Report on Public Awareness Survey 2012 and 2017 survey to evaluate level of public awareness on biotechnology and biosafety	Completed	Surveys were done to assess the level of awareness and the effectiveness of implementation of National Biotechnology and Biosafety Strategy 2012 — 2017
Mainstreaming of biotechnology and biosafety into training courses "primary and high school"	Completed	Bio safety issues mainstreamed into curricula for primary and high school.
Setting up national information exchange network among Competent Authorities	Completed	Information exchange mechanisms established internally and among Competent Authorities

## ANNEX 6: FINANCIAL TABLES

**Table 1. Project Funding Sources Table (non-GEF Projects only)**

<b>Funding source</b>	<b>Planned funding</b>	<b>% of planned funding</b>	<b>Secured funding</b>	<b>% of secured funding</b>
All figures as USD				
Cash				
Funds from the Environment Fund				
Funds from the Regular Budget				
Extra-budgetary funding (listed per donor):				
Sub-total: Cash contributions				
In-kind				
Environment Fund staff-post costs				
Regular Budget staff-post costs				
Extra-budgetary funding for staff-posts (listed per donor)				
Sub-total: In-kind contributions				
Co-financing*				
Co-financing cash contribution				
Co-financing in-kind contribution				
Sub-total: Co-financing contributions				
<b>Total</b>				

\*Funding from a donor to a partner which is not received into UN Environment accounts, but is used by a UN Environment partner or collaborating centre to deliver the results in a UN Environment – approved project.

**Table 2. Expenditure by Outcome/Output** (for both GEF and non-GEF projects)

<b>Component/sub-component/output</b> All figures as USD	<b>Estimated cost at design</b>	<b>Actual Cost/ expenditure</b>	<b>Expenditure ratio (actual/planned)</b>
Component 1 Policy Integration	60,669.	NA (*)	
Component 2 Regulatory Regime	159,240.	NA (*)	
Component 3 GMOs Handling Application / Notification	376,536.	NA (*)	
Component 4 Monitoring of Environmental Effects and Enforcement	45,385.	NA (*)	
Component 5 Public awareness, education and participation	129,576.	NA (*)	

Project Coordination, Monitoring & Evaluation	113,400.	NA (*)	
<b>TOTAL</b>	<b>884,806</b>		<b>100 %</b>

(\*) Project Financial Reports and Final Financial Statement (posted in ANUBIS) are presented following UNEP Budget Lines (Objects of Expenditures), not by Project Outcomes / Components (see Table 4 in Chapter 3.6 and here below in Table 2.1)

**Table 2.1: GEF Budget at design and expenditures by Budget Line / Object of Expenditure (12/2018)**

UNEP BUDGET LINE / OBJECT OF EXPENDITURE	Estimated cost at design (USD)	Actual Cost (USD)	Expenditure ratio (actual/planned)
10 PROJECT PERSONNEL	296,070.00	250,463.30	
20 SUB-CONTRACT	0.00	3,145.55	
30 TRAINING	330,329.00	310,673.29	
40 EQUIPMENT & PREMISES	205,119.00	210,867.22	
50 MISCELLANEOUS	53,288.00	109,656.64	
<b>Total</b>	<b>884,806.00</b>	<b>884,806.00</b>	<b>100%</b>

**Table 3: Co-financing Table** (GEF projects only)

Co-financing (Type/Source)	UNEP own Financing (US\$1,000)		Government (US\$1,000)		Other* (US\$1,000)		Total (US\$1,000)		Total Disbursed (US\$1,000)
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
- Grants									
- Loans									
- Credits									
- Equity investments									
- In-kind support			<b>817</b>	<b>817</b>			<b>817</b>	<b>817</b>	<b>817</b>
- Other (*)									
<b>Totals</b>			<b>817</b>	<b>817</b>			<b>817</b>	<b>817</b>	<b>817</b>

\* This refers to contributions mobilized for the project from other multilateral agencies, bilateral development cooperation agencies, NGOs, the private sector and beneficiaries.

**Table 4: Financial Management Table**

Financial management components:	Rating ***	Evidence/ Comments
<b>1. Adherence to UNEP's/GEF's policies and procedures</b>	<b>S</b>	- Periodic financial reports provided  - Financial Inventory reports annually prepared from 2012

			<p>onward. Final inventory prepared and accepted (all in Anubis).</p> <p>- Project complied with UN procurement procedures</p> <p>- Tender procedures highly affected by a Government "blanket suspension" of all tenders (10 months) throughout 2016</p> <p>- Audit reports from the Auditor General of the Government presented annually from 2012 to 2016. No auditing documented in 2017 and 2018 .</p> <p>- Audit of 2015 (expected final year) raised problems in carrying out a proper auditing since the budget formats used in the initial budget and in expenditures accounting to be audited were different, one was by component and the other by category / activity (this is a problem generated by GEF/UNEP Project Budget Design).</p>
<b>2. Completeness of project financial information:</b>			
Provision of key documents to the evaluator (based on the responses to A-H below)			<b>S</b>
A.	Co-financing and Project Cost's tables at design (by budget lines)	Yes	Provided (in ANUBIS)
B.	Revisions to the budget	Yes	All documented in ANUBIS
C.	All relevant project legal agreements (e.g. SSFA, PCA, ICA)	Yes	In ANUBIS
D.	Proof of fund transfers	N/A	



E.	Proof of co-financing (cash and in-kind)	No	Co-financing in kind
F.	A summary report on the project's expenditures during the life of the project (by budget lines, project components and/or annual level)	Yes	All periodic (Quarterly and Annual) financial reports in ANUBIS (by budget lines)
G.	Copies of any completed audits and management responses ( <i>where applicable</i> )	Yes	Provided (in ANUBIS)
H.	Any other financial information that was required for this project (list)	Yes	
<b>3. Communication between finance and project management staff</b>		<b>S</b>	
Project Manager and/or Task Manager's level of awareness of the project's financial status.		HS	Aware and efficient in tackling financial issues
Fund Management Officer's knowledge of project progress/status when disbursements are done.		S	
Level of addressing and resolving financial management issues among Fund Management Officer and Project Manager/Task Manager.		S	Financial issues (remittances, approvals, etc.) timely addressed
Contact/communication between by Fund Management Officer, Project Manager/Task Manager during the preparation of financial and progress reports.		S	Regular
<b>Overall rating</b>		<b>S</b>	

\*\*\* Ratings given on a 6-point satisfactory scale from 'Highly satisfactory' (HS) to Highly Unsatisfactory.

## ANNEX 7: EVALUATION BRIEF

**Implementation of National Biosafety Framework for Lesotho****Duration:** 84 months (14/07/2011 to 13/07/2018)**GEF Allocation:** USD 884,806**Nat. Executing Agency:** Department of Environment (DoE) of the Ministry of Tourism, Environment and Culture**RELEVANCE and OBJECTIVES**

- The implementation of a **National Biosafety Framework (NBF)** implies to prepare, adopt and make operational a combination of policy, legal, administrative and technical instruments enabling the country to manage the safe transfer, handling and use of Genetically Modified Organisms (GMOs) from modern biotechnology.
- This seems particularly relevant in the case of Lesotho, which shares **all boundaries with South Africa** that already has a biosafety regulatory framework and is producing GMO crops, on which (specifically maize) Lesotho relies to achieve its food security. It is, therefore, important that Lesotho can ensure the safe transboundary movement of LMOs from its only neighbouring country.



- The Project focussed on **five main Outcomes**:
  1. **Biotechnology and biosafety mainstreamed** as a sustainable development issue in main national development strategies and plans.
  2. **Regulatory regime** in place, published and applied.
  3. **A workable system for handling applications**, risk assessment and management, and decision making is fully functional.
  4. **Monitoring and enforcement mechanisms** developed and in operation.
  5. **Fully functioning Systems for public awareness** and education, for access and sharing of information and for public participation in decision-making.
- The Biosafety Framework of Lesotho started from a very low baseline and has progressed within a **highly unfavourable socio-political context during the timeframe of the Project**, that has heavily reflected into the institutional and operational framework of the country.
- **Relevant Outputs** have been, nevertheless, delivered, such as:

- ✓ Biosafety Bill 2018 has been drafted (not approved by the Parliament that was dismissed twice during the Project), guidelines for risk assessment, risk management, monitoring and enforcement have been developed, as well as a manual for handling requests.
- ✓ Laboratory equipment has been procured and is available at the University for the setting

of the GMO lab.

- ✓ A broad National Biotechnology and Biosafety Awareness Strategy 2012 – 2017 has been developed and an outreach programmes has been implemented (workshops, awareness materials, newspaper, radio and TV programmes, etc.).

### ASSUMPTIONS AND CHALLENGES

- Relevant assumptions to hold for implementing the Biosafety Framework (NBF) were only partially fulfilled if at all:
  - Human Resources are still not available and operational at the suitable level within the Competent National Authority (the Department of Environment), but also in other sectors involved in Biosafety (e.g. Agriculture, Health, Trade, Justice, Science & Technology and Academic Institutions);
  - The Competent National Authority is not in the institutional position to assume the leadership and play its coordinating role in Biosafety policy and decision-making through mechanisms of coordination and inter-sectorial work;
  - Socio-political environment at a higher and wider level is not sufficiently conducive to make Biosafety agenda progressing in an effective and participatory way.



### LESSONS LEARNED

**Lesson 1.** *A solid institutional framework and leadership are crucial to assert Biosafety as a priority issue for Sustainable Development.*

**Lesson 2.** *It is important to adapt project design and expected results to the baseline situation of the country, expressed needs and priorities, and to in-country real capacity of progressive national ownership and institutional up-take.*

**Lesson 3.** *The preparation, discussion and approval of a Biosafety Law may prove unrealistic to be achieved during the "normal" timeframe of a Project.*

## ANNEX 8: BRIEF CV OF THE CONSULTANT

**Camillo Risoli** (Italy, 1953) is a seasoned international expert in rural development and environmental management. He has a long experience (more than 30 years) in the implementation, coordination and management of projects and programs in Africa and Latin America, with different donors and agencies. Capacity and Institution Building for Rural Development is his main area of expertise.

Camillo has worked as an expert, a chief technical adviser and an independent consultant for UN agencies (FAO, UNEP), Bi-lateral Cooperations (SDC – Swiss Cooperation, Italian cooperation, EC Delegations) and for International NGOs. He has been Team Leader in Long-Term Missions in Nicaragua (1980-82), Cape Verde (1986-96), Mozambique (1996-99) and Zimbabwe (2003-2005).

Food Security and Poverty Reduction have been at the core of his professional commitment, through Community-based projects and participatory actions, Organization & training of rural associations, Sustainable land use and agriculture, Partnership strengthening and networking (Public, Private, Civil Society) for decentralised and participatory local development.

Mainstreaming Environmental issues in Pro-Poor Strategies has been a main component of his action, through Soil & water conservation projects, Reforestation and agro-forestry initiatives, Watershed management and land use planning, Sustainable management of natural resources (soil, water, forests and bio-diversity).

Camillo has acquired a robust experience in advising on national policies and strategic planning for rural development, a solid background in PCM (Programme Cycle Management) and strong skills in Project Monitoring & Evaluation (M&E).

Since 2005, he works as an Independent Consultant and has carried out and led relevant Evaluation missions, such as the Mozambique National Action Plan for Food Security (FAO), the LADA Project - Land Degradation Assessment in Drylands (FAO/UNEP-GEF) in Argentina and China, the Post-Conflict Rural Development in Ivory Coast (FAO/ADB), the setting of the M&E System for FAO/CLCPRO Program (Commission for Locust Control in Western Africa and Maghreb Region), the terminal evaluation of the FAO Programme of Food Security through Commercialization in West Africa (Gambia, Guinea, Liberia, Senegal, Sierra Leone) and the Evaluation of FAO's Decentralization in Latin America & the Caribbean (2013).

From 2012 on, Camillo has carried-out the Biosafety National Frameworks Evaluation (UNEP-GEF) in Kenya, Namibia, Poland, Lithuania, Czech Republic and Slovakia (2012), Bhutan, Lao PDR and Mongolia (2014), Albania, Macedonia and Egypt (2015), Ghana, Liberia and Nigeria (2017), the Final Evaluation of the Global GEF/UNEP Programme (123 countries) "Development of National Biosafety Frameworks" (2016), the ABS-Nagoya Protocol Project in Guatemala (2018) and the Biosafety Regional Framework implementation in the Caribbean (2019). He has also evaluated the IFAD Agricultural Service Support Project (ASSP) in Botswana (2019) and the FAO WaPOR Project in Ethiopia (2020). He has participated to the Evaluation of FAO's Contribution to SDG2 as Consultant for the Country Case Study in Cabo Verde (2020).

Camillo has a graduate degree in Agricultural Sciences, a Post-Graduate Diploma in Environmental Management at London University and a PhD in Adult Education. He has published with FAO training manuals and methodological guides for trainers and extensionists.

Camillo is currently engaged in the creation of a small private company in partnership with farmers' associations (out-growing scheme) for the development of a profitable value-chain of Aloe Vera in Cape Verde.

## ANNEX 9: QUALITY ASSESSMENT OF THE EVALUATION REPORT

### Quality Assessment of the Evaluation Report

Evaluand Title:

**Implementation of National Biosafety Framework for Lesotho - GEF ID # 3646**

All UNEP 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.

	UNEP Evaluation Office Comments	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>Final report:</b></p> <p>Includes all aspects required but not well structured as a narrative. Lessons learned and Recommendations not incorporated into the text.</p>	4
<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>Final report:</b></p> <p>Complete and concise section that highlights purpose of the Evaluation. Doesn't include a concise statement of the purpose of the evaluation and the key intended audience for the findings</p>	5
<p><b>II. Evaluation Methods</b></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>Methods to ensure that potentially excluded groups (excluded by gender, vulnerability or marginalisation) are reached and their experiences captured effectively, should be made explicit in this section.</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; gaps in documentation; extent to</p>	<p><b>Final report:</b></p> <p>Detailed description of the approach taken.</p> <p>Methods to ensure that potentially excluded groups are reached was included.</p> <p>Limitations comprehensively acknowledged</p>	5

<p>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. Is there an ethics statement?</p>		
<p><b>III. The Project</b></p> <p>This section should include:</p> <ul style="list-style-type: none"> <li>Context: 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>Results framework: Summary of the project's results hierarchy as stated in the ProDoc (or as officially revised)</li> <li>Stakeholders: Description of groups of targeted stakeholders organised according to relevant common characteristics</li> <li>Project implementation structure and partners: A description of the implementation structure with diagram and a list of key project partners</li> <li>Changes in design during implementation: Any key events that affected the project's scope or parameters should be described in brief in chronological order</li> <li>Project financing: Completed tables of: (a) budget at design and expenditure by components (b) planned and actual sources of funding/co-financing</li> </ul>	<p><b>Final report:</b></p> <p>Comprehensive section all elements are covered</p>	5
<p><b>IV. Theory of Change</b></p> <p>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>This section should include a description of how the TOC at Evaluation<sup>23</sup> was designed (who was involved etc.) and applied to the context of the project? Where the project results as stated in the project design documents (or formal revisions of the project design) are not an accurate reflection of the project's intentions or do not follow UNEP's definitions of different results levels, project results may need to be re-phrased or reformulated. In such cases, 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. 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'.</p>	<p><b>Final report:</b></p> <p>The TOC section is well described, including how the results framework was re-aligned to form the reconstructed TOC, TOC diagram and drivers and assumptions</p>	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 UNEP's mandate and its alignment with UNEP's policies and strategies at the time of project approval. An assessment of the</p>	<p><b>Final report:</b></p> <p>Clear and concise.</p>	5

<sup>23</sup> During the Inception Phase of the evaluation process a TOC at Evaluation Inception is created based on the information contained in the approved project documents (these may include either logical framework or a TOC or narrative descriptions), formal revisions and annual reports etc. During the evaluation process this TOC is revised based on changes made during project intervention and becomes the TOC at Evaluation.

<p>complementarity of the project at design (or during inception/mobilisation<sup>24</sup>), 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>i. Alignment to the UNEP Medium Term Strategy (MTS) and Programme of Work (POW)</li> <li>ii. Alignment to Donor/GEF Strategic Priorities</li> <li>iii. Relevance to Regional, Sub-regional and National Environmental Priorities</li> <li>iv. Complementarity with Existing Interventions</li> </ul>		
<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>Final report:</p> <p>Good summary of assessment of project design.</p>	<p>5</p>
<p><b>C. Nature of the External Context</b></p> <p>For projects where this is appropriate, key <u>external</u> features of the project's implementing context that limited the project's performance (e.g. conflict, natural disaster, political upheaval<sup>25</sup>), and how they affected performance, should be described.</p>	<p>Final report:</p> <p>Requirement met</p>	<p>5</p>
<p><b>D. Effectiveness</b></p> <p><b>(i) Outputs and Project Outcomes:</b> How well does the report present a well-reasoned, complete and evidence-based assessment of the a) availability of outputs, and b) achievement of project outcomes? How convincing is the discussion of attribution and contribution, as well as the constraints to attributing effects to the intervention.</p> <p>The effects of the intervention on differentiated groups, including those with specific needs due to gender, vulnerability or marginalisation, should be discussed explicitly.</p>	<p>Final report:</p> <p>The justification for ratings is laid out and the assessment is transparent and credible.</p>	<p>5</p>
<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>Any unintended negative effects of the project should be discussed under Effectiveness, especially negative effects on disadvantaged groups.</p>	<p>Final report:</p> <p>The justification for ratings is laid out and the assessment is transparent and credible.</p>	<p>5</p>
<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</p>	<p>Final report:</p>	

<sup>24</sup> A project's inception or mobilization period is understood as the time between project approval and first disbursement. Complementarity during project implementation is considered under Efficiency, see below.

<sup>25</sup> Note that 'political upheaval' does not include regular national election cycles, but unanticipated unrest or prolonged disruption. The potential delays or changes in political support that are often associated with the regular national election cycle should be part of the project's design and addressed through adaptive management of the project team.

<p>management' table.</p> <p>Consider how well the report addresses the following:</p> <ul style="list-style-type: none"> <li>• Adherence to UNEP's financial policies and procedures</li> <li>• completeness of financial information, including the actual project costs (total and per activity) and actual co-financing used</li> <li>• communication between financial and project management staff</li> </ul>	<p>A concise section supported by information on expenditures under Project Finance</p>	<p>5</p>
<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 during project implementation of/building on pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc.</li> <li>• The extent to which the management of the project minimised UNEP's environmental footprint.</li> </ul>	<p><b>Final report:</b></p> <p>A clear section in which the assessment of efficiency is made evident.</p>	<p>5</p>
<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 (including SMART results with measurable indicators, resources for MTE/R etc.)</li> <li>• Monitoring of project implementation (including use of monitoring data for adaptive management)</li> <li>• Project reporting (e.g. PIMS and donor reports)</li> </ul>	<p><b>Final report:</b></p> <p>Clear and concise discussion, however 3 sections combined into 2 because of lack of information on project reporting</p>	<p>4</p>
<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 project outcomes including:</p> <ul style="list-style-type: none"> <li>• Socio-political Sustainability</li> <li>• Financial Sustainability</li> <li>• Institutional Sustainability</li> </ul>	<p><b>Final report:</b></p> <p>Adequate section.</p>	<p>5</p>
<p><b>I. Factors Affecting Performance</b></p> <p>These factors are <u>not</u> discussed in stand-alone sections but are <b>integrated in criteria A-H as appropriate</b>. Note that these are described in the Evaluation Criteria Ratings Matrix. To what extent, and how well, does the evaluation report cover the following cross-cutting themes:</p> <ul style="list-style-type: none"> <li>• Preparation and readiness</li> <li>• Quality of project management and supervision<sup>26</sup></li> <li>• Stakeholder participation and co-operation</li> </ul>	<p><b>Final report:</b></p> <p>All elements are addressed to some extent, however not a lot of attention is paid throughout the report to cross-cutting issues in general. Institutional learning could be increased with more emphasis on Human Rights</p>	<p>4</p>

<sup>26</sup> In some cases 'project management and supervision' will refer to the supervision and guidance provided by UNEP 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 UNEP.



<ul style="list-style-type: none"> <li>• Responsiveness to human rights and gender equity</li> <li>• Environmental and social safeguards</li> <li>• Country ownership and driven-ness</li> <li>• Communication and public awareness</li> </ul>	(Right to Food in particular) been addressed within the scope of the project.	
<b>VI. Conclusions and Recommendations</b>		
<p><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. Human rights and gender dimensions of the intervention (e.g. how these dimensions were considered, addressed or impacted on) should be discussed explicitly. Conclusions, as well as lessons and recommendations, should be consistent with the evidence presented in the main body of the report.</p>	<p>Final report:</p> <p>Section complete and strategic questions addressed.</p>	5
<p><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 are intended to be adopted any time they are deemed to be relevant in the future and must have the potential for wider application (replication and generalization) and use and should briefly describe the context from which they are derived and those contexts in which they may be useful.</p>	<p>Final report:</p> <p>Section complete.</p>	5
<p><b>iii) Quality and utility of the recommendations:</b></p> <p>To what extent are the recommendations proposals for specific action to be taken by identified people/position-holders to resolve concrete problems affecting the project or the sustainability of its results? (i.e. points of corrective action). 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.</p> <p>At least one recommendation relating to strengthening the human rights and gender dimensions of UNEP interventions, should be given.</p> <p>Recommendations should represent a measurable performance target in order that the Evaluation Office can monitor and assess compliance with the recommendations.</p> <p>In cases where the recommendation is addressed to a third party, compliance can only be monitored and assessed where a contractual/legal agreement remains in place. Without such an agreement, the recommendation should be formulated to say that UNEP project staff should pass on the recommendation to the relevant third party in an effective or substantive manner. The effective transmission by UNEP of the recommendation will then be monitored for compliance.</p> <p>Where a new project phase is already under discussion or in preparation with the same third party, a recommendation can be made to address the issue in the next phase.</p>	<p>Final report:</p> <p>The recommendation relates, broadly, to how project can continue to improve in the future, and address important aspects of the project, however lacks feasibility in terms of realistic implementation and specifics in terms of who would do what and when.</p> <p>Recommendation relating to strengthening the human rights and gender dimensions is not present.</p>	4
<b>VII. Report Structure and Presentation Quality</b>		
<p><b>i) 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?</p>	<p>Final report:</p> <p>Now follows UNEP's Evaluation Office guidelines.</p>	5

<p>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?</p>	<p>Final report:                   Quality of report writing and formatting has improved to be adequate</p>	<p>4</p>
<p><b>OVERALL REPORT QUALITY RATING</b></p>		<p><b>4.75                  Moderately Satisfactory</b></p>

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.