



Mid-Term Review of FAO-GEF Project

FAO Project ID: GCP /INT/500/GFF

GEF Project ID: 10560

Fisheries and Ecosystem Based Management for the Blue Economy of the Mediterranean (FishEBM MED) project

Final Report

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

June 2026

Contents

Acknowledgements.....	3
Acronyms and abbreviations	4
Executive summary	6
1. Introduction	22
<i>Purpose and objective of the MTR.....</i>	<i>22</i>
<i>Scope of the MTR.....</i>	<i>22</i>
<i>Intended users</i>	<i>22</i>
<i>Methodology</i>	<i>23</i>
<i>Level of stakeholder engagement in the MTR.....</i>	<i>24</i>
<i>Inclusion of women in the MTR process</i>	<i>25</i>
<i>Composition of the MTR team.....</i>	<i>25</i>
<i>Limitations of the MTR process</i>	<i>25</i>
2. Project background and context.....	25
<i>Project background</i>	<i>25</i>
3. Project objective, components and Theory of Change (ToC)	28
4. MTR key findings and MTR questions	31
<i>Relevance, cohesion and ownership.....</i>	<i>31</i>
5. Conclusions and recommendations	89
5.1. <i>Conclusions.....</i>	<i>89</i>
5.2. <i>Recommended actions</i>	<i>95</i>
6. Lessons learned	101
7. Annexes	102
Annex 1. Terms of reference for the MTR.....	102
Annex 2. MTR itinerary.....	102
Annex 3. Stakeholders interviewed during the MTR	103
Annex 4. MTR matrix (review questions and sub-questions).....	105
Annex 5. List of documents consulted	116
Annex 6. Results matrix showing achievements at mid-term and MTR observations.....	117
Annex 7. Co-financing table (data received 30 July 2025)	137
Annex 8. Notes on MTR ratings and achievements summary table	139
Annex 9. Suggested reformulation for GCP Results Framework.....	141

Acknowledgements

The MTR team comprised two independent international consultants – Nigel Varty and Sima El Najjar - with Nigel Varty as lead consultant focusing mostly on technical issues related to fisheries management and marine biodiversity, and Sima El Najjar on stakeholder engagement, knowledge management and communications and gender.

The MTR was carried out with the invaluable assistance of GFCM and FAO staff at their Rome headquarters in Rome, and the UNEP-MAP staff in Athens and SPA/RAC staff in Tunis. Their insight, knowledge, advice, and comments made this MTR possible. The MTR team would particularly like to thank the Project Technical Manager/Project Coordinator (PTM/PC) – Anna Carlson– and other members of the project team as well as the FAO Lead Technical Officer – Carlos Fuentesvilla - for helping to organise the interviews and hosting the Inception Mission in November 2025 at FAO HQ and GFCM HQ in Rome, as well as Ydidiya Abera of the FAO-GEF Unit for guidance and oversight of the MTR process.

The MTR benefited from the inputs of many other stakeholders. Their contributions were critical to the MTR team's work and are deeply appreciated.

MTR team

- Nigel Varty
- Sima El Najjar

FAO GEF Unit staff

- Ydidiya Abera

Acronyms and abbreviations

AWP/B	Annual work-plan and budget
BH	Budget Holder
CSO	Civil society organization
CU	FAO-GEF Coordination Unit
EA	(GEF) Executing Agency
EBFM	Ecosystem-Based Fisheries Management
ESS	Environmental and Social Safeguards
FAO	Food and Agriculture Organization of the United Nations
FishEBM BS	Fisheries and ecosystem-based management for the Black Sea
FishEBM MED	Fisheries and ecosystem-based management for the Blue Economy of the Mediterranean
FLO	Funding Liaison Officer
GAP	Gender Action Plan
GEF	Global Environment Facility
GFCM	General Fisheries Commission for the Mediterranean
Ha	Hectare (10,000 square metres; 0.01 square kilometre)
HQ	Headquarters
IA	(GEF) Implementing Agency
IMAP	Integrated Monitoring and Assessment Programme of the Mediterranean Sea and Coast and Related Assessment Criteria
IUU	Illegal, Unreported and Unregulated fishing
IW	(GEF) International Waters (Focal Area)
LEK	Local Ecological Knowledge
LME	Large Marine Ecosystem
LTO	Lead Technical Officer
MAP	Mediterranean Action Plan
M&E	Monitoring and Evaluation
MCS	Monitoring, Control and Surveillance
MTR	Mid-term review
NFI	(FAO) Division of Fisheries and Aquaculture
NGO	Non-governmental organisation
OPIM	Operational Partnership Implementation Modality
PMU	Project Management Unit
PIF	Project Identification Form
PIR	Project Implementation Review
PPG	Project Preparation Grant
PPR	Project Progress Report
PSC	Project Steering Committee
PTF	Project Task Force
REU	FAO Regional Office for Europe and Central Asia
RFMO	Regional Fisheries Management Organization

RM	MTR Manager
RPOA-SSF	Regional Plan of Action for Small-Scale Fisheries in the Mediterranean and the Black Sea
SAC	(GFCM) Scientific Advisory Committee
SDG	Sustainable Development Goal
SEP	Stakeholder Engagement Plan
SPA/RAC	Specially Protected Areas Regional Activity Centre (of UNEP/MAP)
SSF	Small-scale fisheries
TE	Terminal Evaluation
UNEG	United Nations Evaluation Group
UNEP/MAP	UN Environment Programme Mediterranean Action Plan
VMS	Vessel Monitoring System
WGBS	GFCM Working Group on the Black Sea

Executive summary

1. This report presents the findings, conclusions, and recommendations of the independent Mid-term Review (MTR) of the 'Fisheries and Ecosystem Based Management for the Blue Economy of the Mediterranean - (FishEBM MED) project, GCP /INT/500/GFF known hereafter as the 'FishEBM Med Project'). The purpose of the MTR was to assess progress towards expected project outcomes and objectives and identify recommendations for mid-course adjustments to improve performance, results and potential impact.
2. The MTR was conducted over the period mid-October 2025 to early February 2026 by two independent consultants, one based in the UK (Nigel Varty), the other based in Rome (Sima El Najjar). The MTR was supported by the staff of the project's Project Management Unit (PMU) based at the GFCM headquarters in Rome, the UNEP-MAP headquarters in Athens, SPA/RAC office in Tunis, and FAO's GEF Coordination Unit at FAO HQ in Rome. The MTR focuses on the inception and implementation periods of the project from the official project start date (1 January 2023) up to 31 December 2025 but also includes a less intensive review of the project's design phase (2019-2022).

Introduction

3. The project's objective is *'to reverse the over-exploitation of select commercial living marine resources by enhancing the capacity of Mediterranean countries to manage fisheries, including through the application of ecosystem-based management tools, in their blue economy development pathway'*, and comprises of five components: (1) Strengthened capacity to manage commercial fisheries, with particular focus on Small Scale Fisheries (SSF); (2) Enhanced integration of emerging monitoring, control, and surveillance technologies in the fight against Illegal, Unreported and Unregulated (IUU) fishing; (3) Integrated ecosystem based management tools and ecosystem approach to biodiversity protection and sustainable fisheries; (4) Innovative blue economy solutions accounting for the fishery sector, and (5) Knowledge management and outscaling.
4. The Food and Agriculture Organization of the United Nations (FAO) is the main GEF Implementing Agency (IA) with execution carried out by the General Fisheries Commission for the Mediterranean (GFCM) through a specially established project management unit (PMU) physically based at GFCM Headquarters in Rome. The United Nations Environment Programme (UNEP) is the GEF co-Implementing Agency for the project with UNEP-MAP based in Athens, Greece as the co-executing partner which has contracted their Specially Protected Areas Regional Activity Centre (SPA/RAC) based in Tunis, Tunisia to carry out the bulk of UNEP/MAP's project activities as it is the regional centre that leads on biodiversity issues.
5. The project is a full-sized 5-year GEF-7 project with USD 7,273,973 of GEF funding comprising USD 7,000,000 of funding under the International Waters Focal Area with an allocation of USD 273,973 under the Biodiversity Focal Area (contribution from Montenegro). This was complemented by US 72,027,654 of pledged co-financing at the PPG stage principally from the private sector, GFCM and the participating governments, but interestingly no co-financing was listed from FAO or UNEP in the Project Document.
6. The MTR aimed to assess the relevance, effectiveness, efficiency, and risks to the sustainability of the project results, and factors that have affected its performance and delivery to date, as well as cross-cutting issues (including gender and Environmental and Social Safeguards). The following key review questions (RQ, summarised) guided the work of the MTR:

- **RQ1** – How and to what extent are the project’s objectives and its intended outcomes consistent with national priorities, GEF strategic programmes and FAO strategic objectives and operational programmes? What is the current level of ownership of the project and its results by the project partners and the target beneficiary groups?
 - **RQ2** – To what extent has the project delivered on its expected outputs, outcomes and objectives, in terms of their quality, quantity and timeliness?
 - **RQ3** – How efficient has the project been in its implementation and delivery of results to date?
 - **RQ4** – What have been the main factors affecting the project’s implementation to date?
 - **RQ5** - What is the likelihood of project results and benefits being sustained after the project ends and what are the key risks to the sustainability of the project results and progress towards longer-term impacts?
 - **RQ6** - To what extent has gender equality and other equity concerns been taken in account in the design and implementation of the project?
7. To address the above questions, the MTR team undertook a review of background project documentation and associated literature along with semi-structured interviews with key stakeholders guided by questions from a questionnaire. This was refined during an initial inception mission to FAO HQ in Rome in November 2025 (no other field visits were considered necessary). Interviews were held with a total of 54 individuals with c.70-75 hours¹ of interviews (November 2025 – January 2026).

Key Findings

RQ 1- Relevance, cohesion and ownership

8. The project is considered highly relevant and helps meet global and regional (GEF IW, GFCM and SPA/RAC and UNEP-MAP) agenda and priorities and complement existing initiatives e.g. Fish4Med programme. However, the picture is mixed at the national level with the importance of different elements varying by country. Unfortunately, partly due to the COVID pandemic, there was limited national stakeholder input at the project design stage, and the project was not considered sufficiently tailored to the needs/priorities of individual countries (ownership issue). Also, the ‘common ownership’ of project has not occurred at neither national nor regional levels. It is viewed as more relevant, and likely to have a greater impact, for project’s fisheries than environment aims.

RQ2 – Effectiveness – delivery of project outputs and progress towards project outcomes

Component 1 - Strengthened capacity to manage commercial fisheries, with particular focus on Small Scale Fisheries (SSF)

9. Delivery of this Component is progressing well with collection and analysis of socioeconomic data likely to be complete by mid 2026, although integration and use of such data in fisheries management nationally unclear. The data from at-sea surveys is providing valuable information on fish stocks and project activities are supporting the development and application of the Management Strategy Evaluation (MSE) approach for data poor stocks. However, there have been delays over the project’s intended value chain activities and only minimal piloting is likely before formal end of project. The project’s stakeholder mapping is still ongoing but should provide important information for better engaging local fisher groups in GFCM decision-making and improve fisheries management. However, the capacity needs assessments for SSF organisations have not been carried out.

¹ Some interviews overlapped with those of the MTR of the FishEBM Black Sea project due to some interviewees participating in both projects.

Component 2: Enhanced integration of emerging monitoring, control, and surveillance technologies in the fight against Illegal, Unreported and Unregulated (IUU) fishing

10. Collection of data on economic losses due to IUU fishing and the scale and impacts of IUU fishing has not been undertaken up to the MTR point (31 December 2025) due to significant delays on a decision by GFCM on an appropriate common methodology to collect the data. An alternative approach was being developed at the MTR point and due to be piloted in the final year of the project. However, there has been important updating and expansion of information on legal frameworks held within the GFCM-Lex database under this Component, including related to IUU fishing. There has also been continued progress on the uptake of Vessel Monitoring Systems (VMS) in Montenegro and Albania, although the development and endorsement of a National Plan of Action (NPOA) on IUU fishing (NPOA-IUU) is only likely to be achieved in two countries (Albania or Türkiye) by the end of project.

Component 3: Integrated ecosystem based management tools and ecosystem approach to biodiversity protection and sustainable fisheries

11. Whilst there have been no direct project activities within officially designated marine protected Areas (MPAs) in the mediterranean through the project, the project has provided critical support to creation of a new 270,200 hectares Fisheries Restricted Area (FRA) in the Adriatic Sea (Otranto Channel) which represents a contribution to 30x30 target, including an important stakeholder engagement process. There has also been some useful survey work on status of vulnerable benthic ecosystems with piloting of innovative eDNA metabarcoding, which may have wider potential interest and application beyond fisheries (e.g. general biodiversity surveys). In addition, a Climate Change Adaptation (CCA) workshop was delivered and well received according to interviewees, but the development of follow-up *national/local climate change adaptation strategies or action plans* seems unlikely before end of project given the timeframe and project resources available. The project's activities related to mitigating the negative effects of NIS have also been limited, although a useful workshop was held and series of 'measures' promoted which have helped to raise awareness and knowledge of potential solutions. Project activities to address fisheries tenure issues were minimal and not a priority for most countries (low ownership).

Component 4: Innovative blue economy solutions accounting for the fishery sector

12. No new fisheries sector investments have been identified and mobilised through the project but a well-received Small Scale Fisheries (SSF) workshop on addressing Non Indigenous Species (NIS) has been held although there has not been any significant targeted follow up. Up to the MTR point, no National Action Plan Plus (NAP+) with associated investment plan tested had been developed and endorsed (or even drafted), although SPA/RAC had begun some preliminary activities with the Government of Montenegro, but full NAP+ implementation is judged to be highly unlikely by end 2026. SPA/RAC was also exploring an alternative approach (to that set out in the Project Document) of integrating fisheries considerations into already existing Blue Economy planning processes in Tunisia, Libya, and Morocco.

Component 5: Knowledge management and outscaling

13. National stakeholder platforms to encourage engagement and investment have not yet been finalized. Only an outline project Knowledge Management and Communication (KMC) Plan was developed and has not been properly operationalised. It was also not linked to the Stakeholder Engagement Plan (SEP). Some communication pieces, knowledge products have been delivered although these have been limited in scope, and a clear framework for dissemination of project results and knowledge products tailored to different audiences and stakeholder groups is still lacking. However, regional and global knowledge-exchange events have been well attended by the project. Overall, KMC efforts remain at an early stage and are not yet fully systematic.

RQ2 – Effectiveness - progress towards achieving project objective

14. As expected at the MTR point, whilst there has been good delivery of some outputs (see above), the progress towards achieving meaningful change at the project outcome and objective levels has been mixed and less certain. The degree to which the project objective is being achieved is difficult to assess due to poorly formulated objective and outcome statements and associated indicators (see M&E below). The project is not addressing improvement in the effectiveness of management for MPAs but has provided important support for the establishment of an FRA (an Other Effective Area-Based Conservation Measure, OECM) in the Otranto Channel in the Adriatic Sea, contributing to meeting GEF Core Indicator 2. The project has increased the tonnage of landings from fisheries under more sustainable management contributing to GEF Core Indicator 8.
15. At the outcome level, although there has been some good data collection and helping to build a better 'data culture' in countries (Outcome 1), it is still unclear to what extent fisheries-related information (including stakeholder information and socio-economic data) generated by the project has been used or how it will be integrated into current management decision processes by the end of the project. Similarly, direct project impacts on addressing IUU fishing through the project (Outcome 2) are likely to be limited before the end of the project (mostly through support to Montenegro, Albania and Türkiye), agreement on a common regional methodology represents an important step and the information and guidance on legal frameworks addressing IUU within the updated regional GFCM-Lex database should help support national efforts. Efforts to assess the extent to which project activities have contributed to Outcome 3 – achieving 'healthier marine ecosystems' - are challenging given the poor formulation of the outcome and associated indicators, but the most significant contribution to change under this Outcome so far has been the role played by the project in the creation of the FRA Otranto Channel. There has been little progress towards Outcome 4 as no NAP+ has been developed by the MTR with no associated investment, and there was considerable confusion over what was intended, although there are opportunities to develop guidance to better promote sustainable fisheries within existing blue economy processes in Tunisia, Libya and Morocco which could have significant impact over the longer term (beyond the project's timeframe). In terms of the project's KMC activities to promote awareness and solutions (Outcome 5), some useful knowledge management products and communication pieces have been produced distributed but these remain limited in scope, and their uptake, integration and use are not well documented and consequently, the degree to which the project has changed perceptions and values through its KMC efforts are also difficult to assess. This has not been helped by a weak 'integrative' approach to KMC.

RQ3 - Efficiency

16. Overall efficiency has been mixed with both positive and negative factors contributing to the delivery of the project. Judged on delivery of project activities and results and spending of GEF funds, efficiency has been greater for GFCM than UNEP/MAP and SPA/RAC activities at the MTR point.

RQ4 - Factors affecting performance*Design and readiness*

17. The project suffers from a poorly designed Results Framework, including its project objective and some outcome statements, and associated outcome indicators (mostly outputs), with some elements notably Component 3 being particularly unclear and lacking coherence. Unfortunately, partly due to COVID restrictions, there was limited consultations during the project design phase but no revision to reduce weaknesses in the design took place at project inception. 'Readiness to start' reportedly presented a challenge at national level and there were delays over the formation of GFCM team and a very long delay before SPA/RAC activities could begin.

Project implementation and oversight

18. There has been good operational support from the FAO LTO, but FAO processes e.g. procurement were widely felt to be burdensome/time consuming by partners, and more instruction on GEF requirements could have been provided to GFCM at beginning by FAO. UNEP, the co-IA, delegated project execution to UNEP/MAP but SPA/RAC was requested to undertake most of the execution of the elements led by UNEP/MAP. Oversight by UNEP/MAP has not been as frequent as needed and there has been little oversight inputs from UNEP in Nairobi until recently. Project Steering Committee (PSC) meetings were felt to be useful by participants, especially for exchange and knowledge on the project, but not as a participatory decision-making forum.

Project management and execution

19. Execution by the GFCM project team for the project activities for which they are responsible has been good. The GFCM team has high technical capacity in most relevant areas and is led by a highly capable Technical Project Manager/Project Coordinator (TPM/PC). GFCM introduced a project management system and additional staffing to speed up and improve quality of project execution early in project execution. Both UNEP/MAP and SPA/RAC teams have competent staff, but they began project activities very late due to delays over project agreements, which has especially affected SPA/RAC execution. Although SPA/RAC has made efforts to increase the team's capacity it has still not caught up with delivery, and some activity sets are unlikely to be deliverable in their present form before the end of the project.
20. There was a lack of discussion and little detail developed during the design and early project execution stages on the structures and operational arrangements required for coordination between UNEP/MAP and SPA/RAC and GFCM on project activities, with unclear roles and responsibilities over key areas such as reporting, planning, etc, which contributed to this poor coordination.

Financial management and co-financing

21. There were no major issues with financial management. Delivery of co-financing is difficult to assess but there has been some significant additional 'leveraged' co-financing that needs to be captured.

Partnerships and stakeholder relationships

22. An initial Project Stakeholder Engagement Plan (SEP) was prepared during the design phase but not developed further at inception and remains largely descriptive and insufficiently operationalized. Stakeholder engagement has been uneven across countries and stakeholder groups (e.g. limited involvement of NGOs, women's groups, and the private sector). However, GFCM, UNEP/MAP and SPA/RAC all have well established relationships with key project partners which has supported project execution. Unfortunately, coordination between the project's fisheries and environmental National Focal Points (NFPs) has remained limited and largely ad hoc.

Communications, awareness-raising and knowledge management

23. Some project KMC products, particularly technical reports, have been delivered, but KMC have been constrained by fragmented institutional arrangements within GFCM and SPA/RAC, limited strategic guidance from FAO and UNEP/MAP, and weak project positioning within GFCM, resulting in an insufficiently coordinated KMC approach.

M&E design and implementation

24. The project follows the standard FAO-GEF M&E framework, but M&E execution has been handicapped by a poor Results Framework (outcomes, outputs, indicators) which was poorly constructed and has many weaknesses (many non-SMART indicators). Unfortunately, no changes

were made at inception, and reporting and assessment of project delivery, and especially outcome level, is questionable in many cases.

RQ5 - Sustainability of project results

25. Most threats (risks) to sustainability of the project results are likely to be addressed before the end of the project, but a No Cost Extension (NCE) will be needed to ensure some activities, particularly those led by SPA/RAC, can be completed in time. Continued support from GFCM and UNEP MedProgramme is likely (depending on their funding) for key aims of the project, and some participating Governments clearly see the value of project (notably Albania and Montenegro for fisheries, and Morocco for environmental aspects) and likely to support project results after GEF funding ends. National membership of GFCM and the UNEP MedProgramme and long-term commitments to sustainable use of the natural resources of the Mediterranean should also support project sustainability aims, and there are no significant negative environmental risks likely from the project. However, there has been no significant evidence of catalysis or replication of project results (e.g. outside of region) so far.

RQ6 - Cross-cutting dimensions (gender and ESS)

26. A very brief Gender Action Plan was produced at the design stage but not developed further during inception. Consequently, there have been few direct benefits to women through project activities (the project mostly has a technical focus). Direct support for gender has been limited and dedicated gender expertise was absent.
27. 'Low' rating for ESS was given at the project design stage and remains the case at the MTR point

Conclusions

Relevance

28. The project is highly relevant in helping to meet especially regional and global priorities but less so national priorities. Ownership of the project was not initially as high as it should have been due to limited engagement during the design phase but has improved.

Effectiveness

29. There has been mixed progress at the MTR point (not unusual), with good delivery on fisheries elements (led by GFCM), especially on technical activities and data collection (including on legislation) and VMS, and important contribution to the establishment of an FRA for the Otranto Channel in the Adriatic Sea. However, limited delivery on broader environmental activities (led by UNEP/MAP and SPA/RAC) with many activities behind schedule and some lacking clarity and what their longer-term use and impact might be. It is difficult to assess progress towards the project objective and outcomes, but some good progress has been made with uptake of new approaches and improved information and tools for fisheries and environmental management and increased promotion of these.

Efficiency

30. Overall efficiency has been mixed (typical for project at mid-term point), with both positive and negative factors contributing to efficient delivery of the project.

Factors affecting performance

Design and readiness

31. The project's design had weaknesses, particularly its results Framework, lacking coherence and clarity, which has made the execution of project activities challenging and, in some cases, it handicapped the interpretation and communication of the aims and results of the project. The 'readiness' to start implementation presented a challenge at national level due to confusion over

project aims, recovery from COVID, and inexperience of GFCM with GEF projects at start of the project.

Project implementation and oversight

32. Overall, good support from FAO as the lead GEF IA, but oversight and managerial and technical support provided by UNEP/MAP to SPA/RAC has been limited and should be increased. FAO and UNEP, as the two GEF IAs, appeared to have allowed GFCM and SPA/RAC and UNEP/MAP to largely operate independently - at the MTR point, the project can be characterised as two essentially separate projects with little alignment.

Project management and execution

33. The capable GFCM team has done a good job in delivering the project up to the MTR point. However, the SPA/RAC and UNEP/MAP teams have been less successful with delivery, largely because of delays on starting their project activities due to late signing of the funding transfer agreements, although SPA/RAC has made attempts to catch up by allocating more staffing resources and utilising consultants to deliver many activities. Consultation and coordination between UNEP/MAP and SPA/RAC and GFCM on project activities has been limited and needs to be improved, and the project does not 'showcase the GFCM/MAP approach' that is promoted in the Project Document.

Financial management and co-financing

34. Financial management appears to have been straightforward and without problems (apart from the ICA and PCA) but the picture regarding co-financing is unclear and needs to be addressed.

Partnerships and Stakeholders

35. Despite a very basic SEP, the project has created valuable opportunities for stakeholder participation but engagement of environment NFPs has been inconsistent, and coordination between the fisheries and environment NFPs has remained largely ad hoc and needs to be improved. The project aimed to 'bring together fisheries and environment sectors' to work together more closely in the Mediterranean but to date this has been limited.

Communications/knowledge management

36. Insufficient attention was given to the development and communication of key project messages at inception and the project's KMC Plan has been only minimally developed. Capacity and the required attention to undertake KMC activities effectively has been insufficient, or has suffered from overlapping roles and responsibilities within the GFCM team. Furthermore, KMC has suffered from an insufficiently coordinated approach between UNEP/MAP, SPA/RAC and GFCM, who have operating largely independently of each other.

M&E

37. M&E implementation has been generally adequate, but it has been handicapped by a confusing Results Framework with poorly formulated outcomes and associated non-SMART indicators, which need to be reviewed and revised. Reporting has focused on the activity and output rather than outcome and impact levels, and coverage of cross-cutting issues, such as gender and stakeholder engagement, remains weak. The consistency and coordination of reporting between SPA/RAC and UNEP/MAP as well as with GFCM has been limited at times.

Sustainability and replication and catalysis

38. It is considered too early to make a clear judgement on the sustainability of the project's results, but most controllable risks are likely to be addressed before the end of the project and there will be continued commitment from GFCM, UNEP/MAP and SPA/RAC which are all institutionally stable and most national partners see the value of the project results. However, a sustainability plan will need to be developed in the next year. There has no obvious replication or catalysis of project results to date, and this needs to be considered in the KMc activities over the next year.

Key recommendations (see main report for additional and sub-recommendations)**39. Recommendation 1: Streamlining, rationalising and consolidating project technical elements**

- *General (applies to overall project)* - Cut or reduce activity sets which are of lower priority and refocus on those likely to contribute most to overall aims of project and have most impacts and consider reducing some indicator targets to make the aims of the project more realistic. Following the recommended review of the above suggested activity sets, reformulate/rearrange relevant project outputs and activities in Results Framework, project workplan and budget and discuss and obtain endorsement at 2026 PSC.
- *Component 1* - (i) Clarify to stakeholders how socio-economic data collected by project will be used in fisheries management decision-making and (ii) undertake joint lesson learning workshop with FishEBM Black Sea project on the collection of (a) socio-economic and (b) stakeholder mapping data.
- *Component 2* - Consider 3-4 months No Cost Extension (NCE) for VMS work in Montenegro and Albania.
- *Component 3* - (i) Consider additional trials of eDNA barcoding if funding and time available; (ii) cut further activities to identify, develop and pilot measures to manage/ eradicate NIS due to funds, time and scale of problem; (iii) develop plan and materials to promote uptake of key messages from studies undertaken under Component 3, particularly products published by SPA/RAC under Outputs 3.2 and 3.3 (tied to KMC, Recommendation 2).
- *Component 4* – (i) discuss, agree and document a common understanding of ‘NAP+’ and whether the project should: (a) focus on just upgrading NAPs with additional fisheries inputs (NAP+), and/or (b) support early stages of the on-going (already established) processes to develop national Blue Economy Strategies/Plans in selected countries (Tunisia, Libya and Morocco); and (ii) develop clear written plan for SPA/RAC work under Component 4 for the remainder of project and consider the deliverables, targets, milestones and needs for 6-month NCE to allow SPA/RAC to deliver agreed activities.

40. Recommendation 2: Strengthening KMC (Component 5) and wider dissemination of project messages and results

- Strengthen KMC leadership and technical capacity at GFCM and designate a single overall KMC lead for the project, and strengthen institutional KMC capacity within SPA/RAC.
- Develop and implement a joint KMC strategy for the project with a better developed, more strategic vision clearly identified.
- Establish a clear and consistent narrative for the FishEBM Med project, explicitly distinguishing it from other GFCM and SPA/RAC and UNEP/MAP initiatives.
- Strengthen joint KMC activities between GFCM and SPA/RAC.
- Undertake at least one structured ‘lesson learning’ exercise covering project experiences, processes and results.
- Organize a ‘wrap up’ meeting of both the FishEBM Mediterranean and FishEBM Black Sea projects.

41. Recommendation 3: Improving project coordination and cooperation/collaboration between UNEP/MAP, SPA/RAC and GFCM and environment and fisheries agencies on project activities

- Improve collaboration and coordination between GFCM, UNEP/MAP and SPA/RAC and between environment and fisheries NFPs.
- Capture activities/frameworks to promote cooperation at national and regional levels in the project’s Results Framework through creating a new Output (or possible Outcome) with associated activities, indicators and targets, and ensure new project coordination and

management arrangements are documented in an updated project organogram.[Suggested actions at national and regional levels covered in main report].

42. Recommendation 4: Strengthening partnerships and stakeholder engagement, and addressing gender issues

- *Partnerships and stakeholder engagement* – (i) jointly review and revise project Stakeholder Engagement Plan (SEP) to reflect current set of key partners and stakeholders, and link to revised KMC plan (see above) for more effective dissemination of results; (ii) ensure key project stakeholders (listed in the SEP) are kept regularly informed of project results, developments and opportunities (again linked to the KMC plan); and (iii) explain use of data from stakeholder mapping to groups from which data was collected and their likely future involvement in fisheries management decision-making to ensure common understanding and to manage future expectations.
- *Gender* – (i) Recruit dedicated gender expert and establish clearer project responsibility for gender mainstreaming; (ii) ensure all future project activities consider opportunities to mainstream gender and fully document these activities in project reporting (PIR, PPR, etc); and (iii) review all project KMC products and identify where gender considerations can still be integrated and then, where possible, address these, particularly for issues which would impact on women, e.g., CCA workshop report and regional guidelines.

43. Recommendation 5: Improving project management and sustainability of project results

- Transfer responsibility for some technical areas covered by the GFCM PTM/PC – gender, socio-economic and KMC – to other GFCM staff - to enable the TPM/PC to focus on project management for remainder of project.
- UNEP/MAP to invest more staff time in project monitoring and oversight and providing technical support to SPA/RAC including clarifying the role of UNEP-MAP ‘Project Manager’
- Review and simplify the project reporting lines between SPA/RAC and UNEP/MAP, SPA/RAC and GFCM and UNEP/MAP and GFCM and ensure these are documented and fully identify and properly report on all co-financing (GFCM to lead on this).

44. Recommendation 6: Strengthening the project M&E and reporting framework

- Review and revise the project Results Framework to make project outcomes clearer and replace the project outcome indicators with a set of ‘SMARTer’ project outcome indicators (including 2-3 gender-related indicators) with associated baselines and targets. As part of this exercise add an additional Output to capture ‘cooperation between GFCM and SPA/RAC’ with associated indicators and targets and add another Output to cover the project’s M&E and reporting activities and include the standard set of activities (e.g. PIR, MTR, TE) to meet the request from the GEF, and update GEF Core Indicators 2 and 8 with new calculations (reported in PIR for 2026).
- Strengthen reporting in PIRs and PPRs on gender and stakeholder engagement.
- UNEP/MAP, SPA/RAC and UNEP to urgently extend the ICA and PCA as once these agreements finish no further transfers of GEF payments can occur between UNEP to UNEP/MAP and from UNEP/MAP to SPA/RAC so project activities associated with UNEP/MAP and SPA/RAC will cease.

45. Recommendation 7: Agree on No Cost Extensions for critical elements of project to ensure delivery and maximise impact and sustainability of project results

- Identify key project activities which may need No Cost Extensions (NCE) for up to 6 months (ending June 2027) with a revised Results. Activities for consideration of a NCE include: KMC, VMS, NAP+/BE Plans, piloting of IUU data collection.

46. The overall rating at the MTR point is **MODERATELY SATISFACTORY, but the project has the potential to be SATISFACTORY by end of project if changes are made.**

GEF rating table

GEF criteria/sub-criteria	Rating ²	Summary comments ³
A. STRATEGIC RELEVANCE		
A1. Overall strategic relevance	S	Highly relevant - helps meet regional (GFCM and SPA/RAC and UNEP-MAP) priorities although mixed picture of relevance for countries – some elements more important than others, e.g., important for addressing data gaps nationally (socio-economic - Lebanon), trawl selectivity trials (Tunisia), stock assessments (Lebanon), and SSF workshops on NIS (Morocco), but different context (needs) and capacity to be able to undertake project varied between countries, and MTR interviews indicated that the project was not sufficiently tailored to the needs/priorities of the countries (ownership issue), and has been more relevant for project's fisheries than environment aspects.
A1.1. Alignment with GEF and FAO strategic priorities	S	Aligns with GEF IW priorities and considered important project within FAO's NFI.
A1.2. Relevance to national, regional and global priorities and beneficiary needs	MS	Key project (along with FishEBM BS project) for GFCM and management of regional fisheries in the Mediterranean. Also considered important to UNEP-MAP and to SPA-RAC – helping to advance SAP/BIO and filling a gap addressing fisheries management in MedProgramme (complementary to programme's Child Projects), and UNEP/MAP's Sustainable Development Strategy and Blue Economy priorities. Relevance of SPA/RAC and UNEP/MAP inputs reported to vary between countries. Some countries were not significantly involved in design of the project as they would have liked but ownership (Moderately Satisfactory) improved (at least for fisheries aspects) after the project started.
A1.3. Complementarity with existing interventions	S	Complements other regional efforts to address sustainable fisheries and protection of the environment in the Mediterranean led by GFCM and UNEP-MAP, notably the MedSea4Fish programme (GFCM) and MedProgramme (UNEP-MAP), as well as existing national efforts e.g. ongoing Blue Economy strategies processes for Tunisia, Libya and Morocco, and particularly supports for SPA/RAC's activities on environmental monitoring.
B. EFFECTIVENESS		
B1. Overall assessment of project results	MS	Mixed progress at mid-term. Good delivery on fisheries elements (led by GFCM), especially on technical activities and data collection (including on legislation) and VMS, and important contribution to the establishment of a Fisheries Restricted Area (FRA) for the Otranto Channel in the Adriatic Sea. However, limited delivery on broader environmental activities (led by UNEP/MAP and SPA/RAC) with many behind schedule and some lacking clarity and what their longer-term use and impact might be.
B1.1 Delivery of project outputs	MS	Mixed at mid-term point. Component 1: Progressing well with collection and analysis of socioeconomic data likely to be complete by mid 2026, although integration and use of such data in fisheries management nationally unclear; data from at-sea surveys providing valuable information on fish stocks and activities connected with development and application of MSE

² See rating scheme at the end of the document.³ Include reference to the relevant sections in the report.

		approach for data poor stocks proceeding, but delays over value chain activities and minimal piloting likely before formal end of project; stakeholder mapping still ongoing but should provide important information for better engaging local fisher groups in GFCM decision-making and improve fisheries management. However, capacity needs assessments for SSF organisations not carried out. Component 2: Collection of data on economic losses due to IUU and the scale and impacts of IUU fishing not undertaken due to delays on agreement on a common methodology to collect the data, but alternative approach was being developed at MTR, but important updating and expansion of information on legal frameworks held within the GFCM-Lex database, including related to IUU fishing. And continued progress on uptake of VMS systems in Montenegro and Albania. However, development and endorsement of a NPOA-IUU probably only in two countries (Albania or Türkiye) by end of project. Component 3: Important support to creation of FRA for Otranto Channel but no direct project activities in MPAs, and useful survey work on status of vulnerable benthic ecosystems with piloting of innovative eDNA metabarcoding. Climate Change Adaptation (CCA) workshop was delivered but development of <i>national/local climate change adaptation strategies or action plans</i> seems unlikely before end of project, and project's activities related to mitigating negative effects of NIS have also been limited, although a useful workshop has been held. Project activities to address fisheries tenure issues were minimal and not a priority for most countries. Component 4: No new fisheries sector investments have been identified and mobilised through the project and only one factsheet on innovative solutions for fishery sector to attract blue economy investments has been produced but a well-received SSF workshop on NIS has been held although there has not been any significant targeted follow up. No NAP+ with associated investment plan tested have been endorsed (or even drafted). SPA/RAC has begun preliminary work on the NAP+ in Montenegro, but full NAP+ implementation is judged to be highly unlikely by end 2026, although there is the possibility for the project to contribute to existing Blue Economy planning processes in Tunisia, Libya, and Morocco. Component 5: National stakeholder platforms to encourage engagement and investment have not yet been finalized, and only an outline project KMC Plan was developed (and not linked to SEP) which has not been properly operationalised. Some communication pieces, knowledge products were delivered although limited in scope, and regional and global knowledge-exchange events attended. A clear framework for dissemination of project results and knowledge products tailored to different audiences and stakeholder groups is still lacking. Knowledge management and communication efforts remain at an early stage and are not yet fully systematic.
B1.2 Progress towards outcomes ⁴ and project objectives	MS	Variable achievement to date, some areas much more successful than others (as expected at the mid-term stage). Project objective difficult to measure due to poorly formulated objective statement and indicators for success at outcome and objective stage not SMART so difficult to measure real achievement (see M&E below). Project not addressing improvement

⁴ Assessment and ratings by individual outcomes may be undertaken if there is added value.

		in the effectiveness of management for MPAs, but support to establishment of an FRA (an OECM) in Otranto Channel valuable project contribution, and project has increased the tonnage of landings from fisheries under sustainable management.
Outcome 1 (data for improving fisheries management)	S	Although good data collection to date, it is not clear to what extent this information has been used or how it will be integrated into current management decision processes by the end of the project, and there is limited progress on achieving Outcome 1 – <i>‘Managers and stakeholders use sound information generated on the status of key commercial fisheries to support improved management and selected value chain interventions’</i> - which is unlikely to be reached before end of project. Nevertheless, there has been progress in strengthening national capacity and building a “data culture” to collect and analyse biological and gender disaggregated socio-economic data, particularly in countries where such systems were previously weak, and the stakeholder data collected will help identify and better involve fisher groups in future data collection and decision-making at GFCM. However, the project’s value chain aims have not been adequately addressed and would probably have been better treated as a separate, dedicated project.
Outcome 2 (measures to address IUU fishing)	MS	Information on IUU fishing (economic cost and extent and impact on IUU fishing) has not yet been collected by project so the extent of achievement of Outcome 2 – <i>‘Fisheries management better accounts for the quantity and magnitude of IUU fishing in the Mediterranean Sea and incorporates control measures, including through the use of emerging technologies’</i> – has also been limited to date. However, agreement on methodology has been reached and a trial of the new approach will take place in 2026. The most significant contributions to achieving this outcome to date have been improved information and guidance on legal frameworks addressing IUU (updated regional GFCM-Lex database) although national legislations have yet to fully reflect this (and only two NPOA-IUUs likely by end of project, and, from a practical point of view, project efforts to increase adoption of, or further support for, VMS system in Montenegro, Albania and Türkiye.
Outcome 3 (application of ecosystem-based conservation/management)	MS	Difficult to measure progress on achievement of Outcome 3 – <i>‘Healthier marine ecosystems with more productive fisheries in place, through the synergistic application of ecosystem-based conservation/ management tools and improvements in fisheries tenure governance’</i> - given the poor formulation of the outcome (and associated set of indicators). However, project support which was essential for the creation of the FRA Otranto Channel has been important. Other activities under this Outcome, such as integration of incidentally caught vulnerable species into IMAF based national monitoring plans of the Good Environmental Status of marine waters and marine ecosystem, and project activities to address fisheries tenure do not represent a significant contribution towards achieving the Outcome (as it is stated). In addition, although a CCA-themed workshop has been held it is debatable whether CCA can be viewed as a regular ‘ecosystem-based management tool’. Overall, the extent to which project activities have contributed to the outcome statement of a ‘healthier marine ecosystems’ is debatable (reflecting the poor formulation of this outcome).
Outcome 4 (Blue Economy)	MU	There has been little progress on Outcome 4 – <i>‘Blue economy at the regional and country level promoted through the identification of existing hurdles via a concerted approach among relevant stakeholders’</i> – as no NAP+ has been developed by the MTR with no associated investment, and there was considerable confusion over what was intended. However, there are opportunities to develop guidance to better promote sustainable fisheries within existing blue economy processes in Tunisia, Libya and

		Morocco which have begun to be explored and to at least begin preparatory work on the NAP+ process in Montenegro although little is likely to be achieved before the end of the project.
Outcome 5 (KMC)	MS	There has been some progress towards delivery of Outcome 5 - <i>Integrated pathways conducive of conservation and sustainable management promoted at the regional and global level</i> - through development and promotion of knowledge management products and communication pieces which have been distributed at national, regional and global levels. However, these remain limited in scope, and their uptake, integration and use are not well documented and KMC products do not really identify and highlight the ' <i>Integrated pathways</i> ' as the project has not been designed and delivered with a strong 'integrative' approach.
Overall rating of progress towards achieving objectives/ outcomes	MS	Difficult to assess achievement of project objective given associated indicator set, and similarly for some of the outcomes. Nevertheless, some good progress made with uptake of new approaches and improved information for fisheries management.
B1.3 Likelihood of impact	Not rated at MTR	
C. EFFICIENCY		
C1. Efficiency ⁵	S	The project built on existing GFCM and UNEP/MAP programmes as well as other experiences and lessons from previous initiatives in the Mediterranean, and existing partners, which has supported an efficient delivery of the project. Overall efficiency has been mixed (typical for project at mid-term point), with both positive and negative factors contributing to efficient delivery of the project. Efficiency, judged on delivery of project activities and results and spending of GEF funds, has been greater for GFCM than UNEP/MAP and SPA/RAC activities.
D. SUSTAINABILITY OF PROJECT OUTCOMES		
D1. Overall likelihood of risks to sustainability	ML	Most controllable risks likely to be addressed before the end of the project, but a NCE will be needed to ensure some activities, particularly those led by SPA/RAC, can be completed in time (or risk of non-delivery), as well as a review of project framework to revise or remove lower priority and less impactful outputs and activities.
D1.1. Financial risks	ML	Small budget poses risk to effectiveness and impact of the project results as it limits scale of activities but continued support likely from GFCM and MedProgramme (depending on their funding) for key aims of the project and some participating Governments see value of project (notably Albania and Montenegro for fisheries, and Morocco for environmental aspects) and likely to support project results after GEF funding ends.
D1.2. Socio-political risks	UA	Continued support from GFCM and UNEP/MAP to the participating countries likely (depending on future funding).
D1.3. Institutional and governance risks	L	GFCM institutionally secure and will continue to provide support to the target countries all of which except Bosnia Herzegovina are full members of GFCM so participate in regional governance of fisheries for the Mediterranean, and fisheries staff participate in GFCM fora and decision-making meetings. Similarly, all the participating countries are contracting parties to the Barcelona Convention and are committed to sustainable use of the natural resources of the Mediterranean and have an interest in conservation of its biodiversity.

⁵ Includes cost efficiency and timeliness.

D1.4. Environmental risks	L	No negative environmental risks likely from the project, except possibly related to support to development of value chains (and markets) for NIS although this has been minimal by the project. Project aims to improve status on commercial living marine resources of Mediterranean countries which, certainly for fish species, it is contributing to lowering environmental risk.
D2. Catalysis and replication	MS	Limited production of KMC products to date and no evidence of catalysis or replication so far.
E. FACTORS AFFECTING PERFORMANCE		
E1. Project design and readiness ⁶	MU	Poorly designed project framework (reflected in its Results Framework), including project objective and some outcome statements, and associated outcome indicators (mostly outputs). Component 3 has a mixed focus and is unclear, lacking coherence around the central aim. Limited consultations during project design and no revision at inception. Readiness to start reportedly presented a challenge at national level in some cases due to confusion over project and limited engagement at design stage, and inexperience of GFCM with GEF projects. There were also delays over formation of GFCM team and long delay before SPA/RAC activities could begin which impacted project 'readiness' to start.
E2. Quality of project implementation	MS	Good operational support from the FAO LTO, but FAO processes e.g. procurement felt to be burdensome/time consuming by partners, and more instruction on GEF requirements could have been provided to GFCM at beginning by FAO. UNEP, the co-IA, delegated project execution to UNEP/MAP but SPA/RAC was requested to undertake most of the execution of the elements led by UNEP/MAP. Oversight by UNEP/MAP has not been as frequent as needed and there has been little oversight inputs from UNEP in Nairobi until recently.
E2.1 Quality of project implementation by FAO (BH, LTO, PTF, etc.)	MS	Good LTO input, who had previous GEF project management experience which has helped, especially because this was the first GEF project GFCM had executed. PTF not adding any major additional value as currently constituted. Budget Holder's office in FAO NFI which houses the LTO.
E2.2 Project oversight (PSC, project working group, etc.)	S	PSC meetings felt to be useful by participants, especially for exchange and knowledge on the project, but not as a participatory decision-making forum.
E3. Quality of project execution	MS	Good execution GFCM project team which has high technical capacity in most relevant areas. Led highly capable TPM/PC, despite high demands (covers both FishEBM Black Sea and FishEBM Mediterranean projects). Introduced project management system and additional staffing to speed up and improve quality of project execution. Both UNEP/MAP and SPA/RAC also began project activities late due to delays over project agreements, which has especially affected SPA/RAC execution. Although SPA/RAC has made efforts to increase the team's capacity it has still not caught up with delivery and some activity sets may not be deliverable in their present form before the end of the project.
E3.1 Project execution and management (PMU and executing partner performance,	MS	Very competent, professional and engaged GFCM project team which has high technical capacity in most relevant areas which has supported project execution, and the team has dealt well with challenges. The SPA/RAC team comprises a group of professional, technically experienced individuals but there has been confusion over who is the team leader (which has been divided), further complicated by another layer of unclear management and reporting under UNEP/MAP. Consultation and coordination between

⁶ This refers to factors affecting the project's ability to start as expected, such as the presence of sufficient capacity among executing partners at project launch.

administration, staffing, etc.)		UNEP/MAP and SPA/RAC and GFCM on project activities has been very limited and the project does not 'showcase the GFCM/MAP approach' that is promoted in the Project Document.
E4. Financial management and co-financing	S	No major issues with financial management, but delivery of co-financing difficult to assess and not fully captured, and there has been some significant additional 'leveraged' co-financing that should be captured.
E5. Project partnerships and stakeholder engagement	S	Project Stakeholder Engagement Plan (SEP) prepared but was not expanded with necessary detail at inception and remains largely descriptive and insufficiently operationalized. The project has created multiple opportunities for stakeholder engagement, although this has been uneven across countries and stakeholder groups (for instance, there has been limited involvement of NGOs, women's groups, and the private sector), and stakeholder engagement has remained largely activity-driven rather than strategic. There was a mixed/limited involvement of key partners and stakeholders at the design stage leading to poor ownership and lack of understanding and expectations. However, GFCM, UNEP/MAP and SPA/RAC all have well established relationships with key project partners which has supported project execution. Unfortunately, coordination between the project's fisheries and environmental National Focal Points (NFPs) has varied significantly between countries but has remained limited and largely ad hoc.
E6. Communication, knowledge management and knowledge products	MS	Some project KMC products, particularly technical reports, delivered. However, there were no intensive efforts at inception stage to develop clear messaging linked to stakeholder analysis, and common understanding of aims and results of project has been lacking among participants. Knowledge management and communication have been constrained by fragmented institutional arrangements, limited strategic guidance from FAO and UNEP-MAP, and weak project positioning within GFCM, delays over KMC products generated by SPA/RAC, resulting in an insufficiently coordinated KMC approach.
E7. Overall quality of M&E	MS	Execution of M&E good but handicapped by poor Results Framework (outputs need review and revision, and associated indicator set needs replacing)
E7.1 M&E design	MS	Project follows the standard FAO-GEF M&E framework, but Results Framework (outcomes, outputs, indicators) was poorly constructed and has many weaknesses (many non-SMART indicators). Unfortunately, no changes were made at inception, and reporting and assessment of project delivery, and especially outcome level, is questionable in many cases.
E7.2 M&E plan implementation (including financial and human resources)	S	M&E carried out as in Project Document with regular reporting despite poor design of Results Framework, and human and financial resources to date have been sufficient. GFCM project monitoring system has been enhanced, specially to track and report at financial and budgetary information and at the project activity level, which has supported M&E plan implementation. SPA/RAC has more limited M&E capacity which has affected the accuracy, frequency and quality of their reporting.
E8. Overall assessment of factors affecting performance	MS	Many factors have affected performance, which has been mixed, but project is delivering some good results which are appreciated by the participating countries and key stakeholders.
F. CROSS-CUTTING CONCERNS		
F1. Gender and other equity dimensions	MS	A literature review on gender in the Mediterranean was undertaken during PPG stage but did not significantly contribute to the design of the project's gender specific activities. A one-page project GAP in Project Document is only an outline which was not developed further during inception. Consequently, there have been few direct benefits to women through

		project activities (the project mostly has a technical focus). Support for gender through GFCM has been limited: the focal point is the TPM/PC who has had very limited time for gender, and SPA/RAC lacks a focal point and the position at UNEP/MAP has not been significantly involved in the FishEBM MED project.
F2. Human rights issues	Not rated	Not relevant to project as no indigenous communities or human rights issues
F2. Environmental and social safeguards	S	'Low' rating for ESS was given at the project design stage and remains the case at the MTR point
Overall project rating	MS	Mixed progress at MTR point but some good results and likely to accelerate results (e.g. knowledge products) over next 10 months.

1. Introduction

1. This report presents the findings of the independent Mid-term Review (MTR) of the “Fisheries and Ecosystem Based Management for the Blue Economy of the Mediterranean - (FishEBM MED) project, GCP /INT/500/GFF” (known hereafter as the ‘FishEBM Med Project’).

Purpose and objective of the MTR

2. The MTR is a requirement for full-sized GEF-funded projects, as well as for FAO and UNEP project monitoring and reporting purposes and is identified as a project activity in the Monitoring and Evaluation (M&E) plan presented in the Project Document. Its purpose is principally to provide an independent, external assessment of the progress of the project towards expected project outputs, outcomes and objectives at the mid-term stage of project implementation, and to identify areas for improvement and/or corrective action to better deliver the project’s intended results by the end of the project (see the Terms of Reference (ToR) in Annex 1).
3. The MTR began data collection and interviews in early October 2025 and included a review of project activities and results up to the end of December 2025. However, some interviews took place in January and early February 2026 due to availability of interviewees. The MTR reviewed progress of all project-related activities (across all project components) from the official project start date (1 January 2023) up to 31 December 2025 but also included a review of key issues identified from the project’s design phase (2019-2022). It should be noted that this meant that the MTR examined three years of project execution (rather than the usual 2) and so was conducted rather later than is usual for MTRs, which are typically undertaken just after the mid-point for a FAO-GEF project

Scope of the MTR

4. Following OECD/DAC criteria for evaluation, the MTR focused on assessing the following areas (i) relevance, (ii) effectiveness, (iii) efficiency, (iv) risks to the sustainability of the project results, (v) factors that have affected its performance and delivery of the project to date, as well as (vi) cross-cutting dimensions (including gender, and Environmental and Social Safeguards). It also sought to identify any initial lessons learned on project design, implementation, and management at the mid-term point, and to propose mid-course corrections and/or adjustments to the project’s implementation to improve efficiency and effectiveness of delivery, sustainability, and likelihood of impact. The MTR Team paid special attention to assessing stakeholder engagement and ownership, as well knowledge management and gender issues which are special concerns for the GEF.
5. The MTR followed the guidance set out in the latest Food and Agriculture Organization of the United Nations (FAO) Global Environment Facility (GEF) Guide *FAO (2020) Guide for Planning and Conducting Mid-term Reviews of FAO-GEF projects*⁷.

Intended users

6. The primary intended audience or users of the MTR Report are:
 - i. The Project Management Unit (PMU) staff, based at the headquarters (HQ) of the General Fisheries Commission for the Mediterranean (GFCM) in Rome, Italy which is the main executing partner for the project, and UNEP-MAP based in Athens, Greece, which is the co-executing partner and their Specially Protected Areas Regional Activity Centre (SPA/RAC) based in Tunis, Tunisia which was

⁷ FAO. 2020. Guide for planning and conducting mid-term reviews of FAO–GEF projects and programmes. Rome.

- contracted to carry out the bulk of UNEP/MAP's project activities as it is the regional centre that leads on biodiversity issues.
- ii. Staff at the FAO HQ in Rome, Italy, especially the Fisheries and Aquaculture Division (NFI) and the FAO-GEF Unit, as the GEF Implementing Agency
 - iii. Relevant staff at UNEP HQ in Nairobi, Kenya
 - iv. Other partners and main stakeholder groups (identified in the Stakeholder Engagement Plan (SEP) of the Project Document) include the the national fisheries administrations, research institutes and local fishing communities of the 9 participating countries of Albania, Algeria, Bosnia and Herzegovina, Lebanon, Libya, Montenegro, Morocco, Tunisia and Türkiye. However, Bosnia and Herzegovina has been very little involved in the project as the country currently has no fishing fleet and only a short section of coastline.
7. The initial findings and recommendations of the MTR report were particularly addressed to the project's Steering Committee (SC) during its planned third meeting, which took place on 24-25 February 2026, which was attended by representatives of many of the partners and stakeholders listed above. (A presentation on the key findings and recommendations of the MTR was presented at the SC meeting to speed up the decision-making given the MTR was occurring at the end of the third year of the project).
 8. A stakeholder analysis with a brief presentation of the roles and responsibilities of the individual groups was presented in Annex 1 of the MTR Inception Report (available from the FAO-GEF Unit on request) and representatives selected for interview included all the above groups.

Methodology

9. The MTR followed the methodology set out in its ToR (see Annex 1), namely through:
 - A review of background project documentation provided by the PMU team and the FAO-GEF Unit (the 'project information package' – see Annex 5);
 - An Inception Mission to FAO HQ Rome in November 2025 to discuss and agree key areas the MTR would focus on, identify the key individuals to be interviewed, and to hold preliminary interviews with key GFCM and FAO staff as well as initial virtual meetings with UNEP/MAP and particularly SPA/RAC staff (leading to the production of the MTR Inception Report – for itinerary see Annex 2); and
 - Semi-structured interviews with 54 individuals from the PMU, other GFCM staff, SPA/RAC, UNEP/MAP, FAO, key partners and stakeholders that totalled 70-75 hours of interviews (some people were interviewed more than once, and some interviews overlapped with the MTR for the FishEBM Black Sea Project so it is not possible to judge the exact number of hours spent on interviews for just the Fish EBM Med project).
10. Interviews were structured around a standard set of questions to determine the relevance, effectiveness, efficiency, factors affecting performance, and sustainability of project results, and assessment of the likely longer-term changes/impact of the project, together with identification of lessons learned and recommendations to improve the overall project delivery and better achieve its planned results during the remainder of the project.
11. The main review questions (RQ) are given in Box 1 below with the full set of questions and sub-questions (the 'MTR matrix') that the MTR drew from (see Annex 4). The key overall question for the MTR was 'How can the delivery, impact and sustainability of the project results be improved over the remainder of the project - what changes are needed?'. The project's Theory of Change (ToC) was also used to analyse the structure and causal logic of the project and helped identify MTR questions and potential stakeholders and interviewees.

Box 1: Main MTR review questions

RQ 1: Relevance and ownership - To what extent are the project's objectives and its intended outcomes congruent with GEF focal areas, strategic priorities and operational programmes, and FAO's and UNEP's mandate and policies and national and regional priorities? Have there been any changes in the relevance of the project since its design? To what extent have the intended beneficiaries and stakeholders been involved in the design and implementation?

RQ 2: Effectiveness - How effectively has the project delivered on its expected outputs, outcomes, and objectives to date, in terms of their quality, quantity and timeliness (against milestones)? To what extent has the project achieved its overall objective? Have there been any unintended consequences or results? To what extent can the attainment of results be attributed to the GEF-funded component (as opposed to other projects/interventions)? What would have happened without the GEF funding? What can be done to improve the likely achievement of positive longer-term impacts?

RQ3: Efficiency - To what extent has the project been successful in using available resources to deliver outputs, outcomes, and the project objective efficiently, cost-effectively, and in a timely manner? To what extent is the project making use of opportunities for collaboration with other relevant initiatives (including pooling of resources, mutual learning, and avoiding duplication)? To what extent is the pledged co-financing being delivered?

RQ 4: Sustainability (and replication/catalysis) - What is the likelihood that the project results will be useful or persist after the end of the project? What are the key risks (financial, socio-political, institutional and governance, and environmental) to the sustainability of the project results and progress towards longer-term impacts? To what extent have project results been, or could be, scaled up or replicated, or catalyse further change?

RQ5: Factors affecting performance – What factors have contributed to the effectiveness or ineffectiveness of the project, and why, including: project design and readiness; project execution and management; project oversight and supervision; financial management and co-financing; partnerships and stakeholder engagement; communication, awareness raising and knowledge management; and Monitoring and Evaluation (both in design and implementation)? More specifically: To what extent are implementing and executing agencies effectively discharging their roles and responsibilities? To what extent and how have multi-sector stakeholders at different levels been involved in project design and implementation? How is the project assessing, documenting, and sharing its results, lessons learned and experiences? Is the project's M&E system adequate, practical, and sufficient? Does the M&E system operate as per the M&E plan?

RQ6: Cross-cutting dimensions - To what extent are gender equality and empowerment and other equity issues mainstreamed in the project, both in design and implementation (including M&E)? To what extent does the project conform to GEF and FAO goals and standards on gender equity? To what extent are environmental and social concerns taken into consideration in the design and implementation of the project?

Level of stakeholder engagement in the MTR

12. An initial stakeholder analysis provided by the PMU to the MTR in October 2025 identified various potential interview groups and individuals whose views should be sought during the MTR. This initial list was reviewed by the MTR Team and expanded, based on an analysis of project documents and initial discussions with key GFCM, UNEP/MAP, SPA/RAC and FAO staff.
13. Representatives from the project team, government partners and stakeholder groups interviewed included: (i) all members of the PMU namely the Technical Project Manager/Project Coordinator (TPM/PC), Knowledge Management and Communications (KMC) Consultant, and Finance officer; (ii) other GFCM staff from GFCM HQ in Rome; (iii) FAO staff directly involved in project implementation, administration and oversight in Rome, particularly the Lead Technical Officer (LTO) based in NFI, as well as the GEF Technical Officer (GTO) and Funding Liaison Specialist (FLS) both based in the FAO-GEF

Unit; (iv) staff at the UNEP/MAP office in Athens and SPA/RAC office in Tunis involved with the project's design and execution; (v) representatives from each of the national fisheries and environmental agencies of the participating countries (except Bosnia Herzegovina which has not been involved in the project in any substantial way as it does not currently have a fishing fleet and only a short coastline), as well as (iv) other members of the project Steering Committee (SC). A list of the interviewees is given in Annex 3.

Inclusion of women in the MTR process

14. The MTR attempted to ensure that women were adequately represented in the interviews. Women represented 24 out of 54 individuals interviewed (44%). The MTR examined the extent to which the project has benefited women through its activities and any opportunities to adapt project activities to meet the unique needs of both women and men to improve outcomes.

Composition of the MTR team

15. The MTR team comprised of two independent consultants: Nigel Varty (based in UK) acting as lead consultant, who largely led on assessing issues relating to fisheries management and marine conservation and the project's institutional arrangements, management and financing; and Sima El Najjar (based in Rome) who took the lead on stakeholder engagement, KMC, and gender, and jointly contributed to analysis of the project's M&E framework design and operation. Given Ms El Najjar's language skills (fluent in French, Arabic and English) she also took the lead on conducting the interviews with the French and/or Arabic-speaking interviewees.

Limitations of the MTR process

16. The main challenges facing the MTR were: (i) the poor construction of the project's Results Framework (particularly the outcome indicators and associated mid-term targets) which limited the MTR's ability to assess the project's effectiveness and; (ii) the limited involvement of some key stakeholder groups in the MTR, particularly local fisher and women's groups, and the private sector. It was agreed with the GFCM and the FAO-GEF Unit that no field mission to the Mediterranean region was required for the MTR so interviews were either conducted face-to-face in Rome (during the inception mission in November 2025) or undertaken virtually. Some proposed interviewees identified at the inception stage were also unavailable for interviews.
17. All interviewees were given the option to be interviewed in their own language. Most of the interviewees from the North African countries chose to be interviewed in French so Ms El Najjar undertook those interviews, while some Turkish project participants were interviewed in Turkish with the help of the FAO interpretation service in Rome (the MTR team would like to thank the interpreters for their professionalism and time).

2. Project background and context

Project background

18. The MTR report only presents a summary of relevant information below. Full details of the project can be found in the Project Document.

19. The FishEBM Med project was conceived to build on the long-standing efforts of the GFCM⁸ to manage fisheries in the Mediterranean, particularly recent efforts to better integrate ecosystem-based fisheries management approaches, including the GFCM's 2030 Strategy for sustainable fisheries and aquaculture in the Mediterranean and the Black Sea (GFCM 2030 Strategy), as well as the efforts of the UNEP Mediterranean Action Plan (MAP) to integrate ecosystem-based approaches when addressing marine ecosystem stressors in the Mediterranean region. The project's formulation particularly drew upon the regional and national action plans under the Strategic Action Programme (SAP) for the conservation of Biodiversity and Sustainable Management of Natural Resources in the Mediterranean Region (Post-2020 SAPBIO) and the Protocol concerning Specially Protected Areas and Biological Diversity in the Mediterranean (SPA/BD Protocol).
20. These initiatives highlighted the 'root causes' of unsustainable practices, such as overfishing, bycatch, invasive species, habitat degradation and inadequate enforcement⁹, and underscored the need for coordinated, ecosystem-based management of marine living resources in the Mediterranean. The FishEBM MED project was launched to address these 'root causes'.
21. Various recent high-level international agreements have facilitated a favourable environment for investment in collaborative, science-based interventions in support of sustainable fisheries governance in the Mediterranean and underline the rationale for the project. These include: the Barcelona Convention and its Protocols and the Naples Ministerial Declaration adopted by the Barcelona Convention COP21 in 2019 and the Malta MedFish4Ever Ministerial Declaration on fisheries signed by Ministers and high-level representatives of 16 Mediterranean countries, the European Union and other partners in 2017, as well as the adoption of the FAO Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (SSF Guidelines) (2014) and the GFCM's ensuing Regional Plan of Action for Small-Scale Fisheries in the Mediterranean and the Black Sea (RPOA-SSF) (2018). In addition, GFCM's establishment of the MedSea4Fish capacity development programme in 2021 provided a regional framework for scientific and technical collaboration, further reinforcing the institutional foundation for change.
22. Collaboration between GFCM and UNEP-MAP to jointly address the above issues was formalized through a Memorandum of Understanding (MoU) signed in 2012, which set out concrete areas of cooperation, including promoting the ecosystem approach to conserve marine ecosystems and sustainably use living resources, mitigating the impacts of fisheries and aquaculture on marine habitats and species, harmonizing criteria for the designation of Specially Protected Areas of Mediterranean Importance (SPAMIs) and Fisheries Restricted Areas (FRAs), strengthening legal and policy frameworks, and advancing integrated maritime planning.
23. The project is being implemented in the Mediterranean region, focused on the following Mediterranean Sea riparian countries: Albania, Algeria, Bosnia and Herzegovina, Lebanon, Libya, Montenegro, Morocco, Tunisia and Türkiye. It aims to leverage the complementary mandates of the GFCM, which is the organization with the authority to adopt legally binding recommendations for the conservation and management of shared fisheries resources, and the MAP via the Barcelona Convention, as the Regional Seas Programme (RSP), which coordinates activities aimed at the protection of the Mediterranean marine environment through a regional approach. In particular, the project aims to contribute directly to the joint GFCM-MAP framework by supporting the shift from a narrow fisheries management vision to a wider, more holistic, ecosystem-based approach.
24. The causal logic of the project is based on the rationale that this can be achieved through actions to improve the enabling environment (legal/regulatory frameworks and their implementation, investment opportunities) and through building the capacity of key stakeholders (through improved

⁸ GFCM is the Regional Fisheries Management Organization (RFMO) for the Mediterranean and Black Sea region.

⁹ It should be noted that 'inadequate enforcement' is not a 'root cause'; rather it is a barrier to addressing the threat (and justifies the project's efforts to address IUU fishing). The MTR notes that there is some confusion between root causes and barriers in the Project Document.

knowledge, skills, tools and application of best practices for fisheries and marine environment management) at the regional and national levels. The project aims to encourage stakeholders to give a greater and wider focus on the development of controls, management plans, value chains and other tangible measures that have the potential to mobilize investments and break the cycle of dependence from external support that is still prominent at the national level in the GEF-eligible Mediterranean countries, and to build the capacity (including relevant information) to do so. The project differs from the usual fisheries and aquaculture development projects in that it gives greater priority to social and economic benefits (rather than single-user interests). Actions include piloting the integration of fisheries into one country's NAP+ (Montenegro)¹⁰ employing results derived from other project Components, building on the existing cooperation between the GFCM and the MAP and against the background of the MedProgramme. The 4-year Project began on 1 January 2023 with an expected NTE date of 31 December 2026 and is funded under the GEF-7 International Waters Focal Area and Biodiversity Focal Area (part of the STAR allocation from Montenegro).

25. The project has two GEF Implementing Agencies - the Food and Agriculture Organization of the United Nations (FAO) and the UN Environment Programme (UNEP). FAO, as the lead agency, is responsible for project-level reporting, evaluations and implementation processes. Day-to-day implementation is entrusted to the GFCM and the UNEP-Mediterranean Action Plan (UNEP/MAP), acting as Executing Agencies, with UNEP/MAP having delegated its role (for those project outputs backstopped by UNEP/MAP) to SPA/RAC (office in Tunis, Tunisia) via a Project Cooperation Agreement (PCA). Executing Agency responsibilities include, but are not limited to, procurement, financial management, monitoring and reporting and for GFCM are carried out through a Project Management Unit (PMU) which is physically based at GFCM Headquarters in Rome, with support from the FAO's Fisheries and Aquaculture Division (NFI). UNEP/MAP as co-executing agency has responsibility for overseeing the delivery of the SPA/RAC activities (although this was not clear to the MTR and activities are supposed to be developed and coordinated with the GFCM PMU).
26. The PMU consists of a full-time Technical Project Manager/Project Coordinator (TPM/PC, who is also the TPM/PC for the FAO-GEF 'Fisheries and ecosystem-based management for the Black Sea (FishEBM BS)' project'), supported by various staff with responsibility for Monitoring and Evaluation (M&E), Knowledge Management and Communication (KMC), and financial administration as well as GFCM technical staff with responsibility for various aspects of fisheries management and involved directly in providing technical support to the project, particularly for Components 1 and 2 and 5. The PMU is housed at the GFCM office in Rome.
27. UNEP/MAP is the official executing agency for the project on behalf of UNEP (as the joint IA) and not SPA/RAC, although SPA/RAC was given responsibility for undertaking many of the technical activities (but not all) to be led by UNEP/MAP. Management staff at UNEP/MAP's responsible for the FishEBM project include the UNEP/MAP MedProgramme Management Officer, based in Athens, Greece, and a separate project manager (understood based on UNEP/MAP feedback to be an international waters specialist), based in Rome, who provides back-stopping support¹¹. Some of the membership of the SPA/RAC team has changed during the project's duration but at the MTR point the project was supported by a SPA/RAC Technical Project Manager, a Programme Officer (Ecosystem Conservation), a

¹⁰ The section covering the ToC in the Project Document gives particular emphasis to the piloting of the NAP+, suggesting that the NAP+ for Montenegro is a major output/outcome of the Project, and indeed it is stated that *'the experience stemming from correlating the national activities, as captured in the NAP+, and the multi-country activities of the proposed project is expected to facilitate the replication of best practices in other GEF Mediterranean eligible counties and the consequent scaling up of methodologies needed to catalyze transformational change'*. However, the project only targets one country for NAP+ development, which is rather limited.

¹¹ One reviewer noted that 'The oversight guidance role was undertaken by the MedProgramme Coordinating Unit established at the UNEP/MAP Secretariat. The MedPCU has a Project Manager supported by an international expert on International Waters, a finance officer, a programme assistant. It includes also a Knowledge Management and Communications expert and a Gender expert. In their tasks, they have responsibilities regarding reporting, including financial, narrative reporting, knowledge management as well as organising travel for the attendance to the Project SCM. In particular, more concrete responsibilities were given to the MedProgramme International Waters Specialist at MedPCU to work closely with the SPA/RAC Project Management Team to close the gap in terms of a number of administrative delays related to signature and payments to SPA/RAC.' However, as noted above responses during MTR interviews did not reflect this level of input by UNEP/MAP consequently, there is a difference of opinion over the level of oversight provided to the project by the MedPCU.

Programme Specialist (previous on involved in several project components, current one focused on Blue Economy) a Communication Officer, and a Financial and Administrative Assistant. According to MTR interviews members of the team are sometimes asked to work on other SPA/RAC projects. In addition, SPA/RAC's Communication Officer while not formally part of the project team, as this position is not financed by the project and was not foreseen in the project budget has occasionally provided communication support to the project as part of her broader institutional responsibilities.

3. Project objective, components and Theory of Change (ToC)

28. The Project Objective (as stated in the Project Document) is *'to reverse the over-exploitation of select commercial living marine resources by enhancing the capacity of Mediterranean countries to manage fisheries, including through the application of the ecosystem-based management tools, in their blue economy development pathway'*. This will be achieved through provision of support for activities under five components. These are:

- **Component 1. "Strengthened capacity to manage commercial fisheries, with particular focus on SSF"**. Component 1 focuses on improving the body of technical knowledge for ecosystem-based management decision-making for key stocks at a regional level. This includes filling gaps in the collection of fisheries and non-fisheries related data in line with regional data collection protocols, including the collection and integration of gender disaggregated socio-economic data (such as information on value chains and the role and contributions of women to fisheries) into decision-making processes, along with the modelling of management scenarios (particularly of data-limited contexts) and promoting adaptive management plans. This Component also seeks to build a framework for meaningful stakeholder engagement in fisheries management, as well as promoting adequate social protection access, which is expected to support environmental sustainability, economic returns and social inclusiveness priorities.
- **Component 2. "Enhanced integration of emerging monitoring, control, and surveillance technologies in the fight against IUU fishing"**. This component is intended to focus on assessing and reducing IUU fishing in the Mediterranean, including by facilitating national action plans to address IUU fishing and supporting consideration of IUU impacts in fisheries management. Specific support includes the creation of a regional repository of legal frameworks (housed at GFCM), supported by the analysis of gaps in national legislations, and the provision of technical assistance to strengthen legislative frameworks. New monitoring, control and surveillance (MCS) technologies, such as Vessel Monitoring System (VMS) transponders, are being piloted in specific countries to assess their feasibility for national fleets and adapted to national contexts, carried out with the support of private sector. These seek to improve compliance and reduce illegal practices across all fleet segments, particularly SSF which are the dominate fisheries in the Mediterranean.
- **Component 3. "Integrated ecosystem-based management tools and ecosystem approach to biodiversity protection and sustainable fisheries"**. This component aims to support healthier and more productive marine ecosystems by promoting the application of integrated ecosystem-based management tools and approaches. It focuses on supporting the identification and implementation of area-based measures such as Fisheries Restricted Areas (FRA), integration of fisheries data into Good Environmental Status (GES) monitoring, and developing climate change adaptation strategies for coastal communities. It also aims to promote approaches to mitigating non-indigenous species (NIS) impacts, marine litter, and other stressors while promoting rights-based tenure approaches and engaging local users to encourage voluntary conservation behaviours and sustainable resource use. This Component is the least 'coherent'.
- **Component 4. "Innovative blue economy solutions accounting for the fishery sector"**. This component aims to position the fishery sector within broader blue economy strategies by analysing

hurdles to investment and identifying opportunities for sustainable diversification. It seeks to develop factsheets/experience notes to disseminate good practices and investment opportunities identified through the project and consolidate databases of relevant stakeholders to support investment in the sector. To this end, this component seeks to facilitate some proof-of-concept studies to capture emerging opportunities, such as market-based solutions for addressing NIS. Under this component, a pilot Blue Economy National Action Plans (NAP+ - the “+” reflects the enhanced contribution by sustainable and profitable fisheries at the regional level to a national blue economy strategy) with an investment plan is envisaged for Montenegro, aiming to demonstrate how fisheries can drive economic development while meeting biodiversity and climate priorities. It is expected that this experience will help inform the development of regional guidelines for replication. Like Component 3, this is a particularly challenging Component with a broad scope.

- **Component 5. “Knowledge management and outscaling”.** This component focuses on knowledge management and outscaling (catalysis and replication) of project results and identification and dissemination of lessons learned, informed by a dedicated outreach and communications strategy. Actions under this component include leveraging synergies with other GEF initiatives and FAO programmes to enhance the visibility and uptake of best practices beyond the Mediterranean Sea. This Component also seeks to build networks among stakeholders, supporting platforms for investment and engagement, and as such does not really fit well with this Component, but is cross-cutting so was presumably placed here as there is no dedicated component for stakeholder engagement and partnerships.

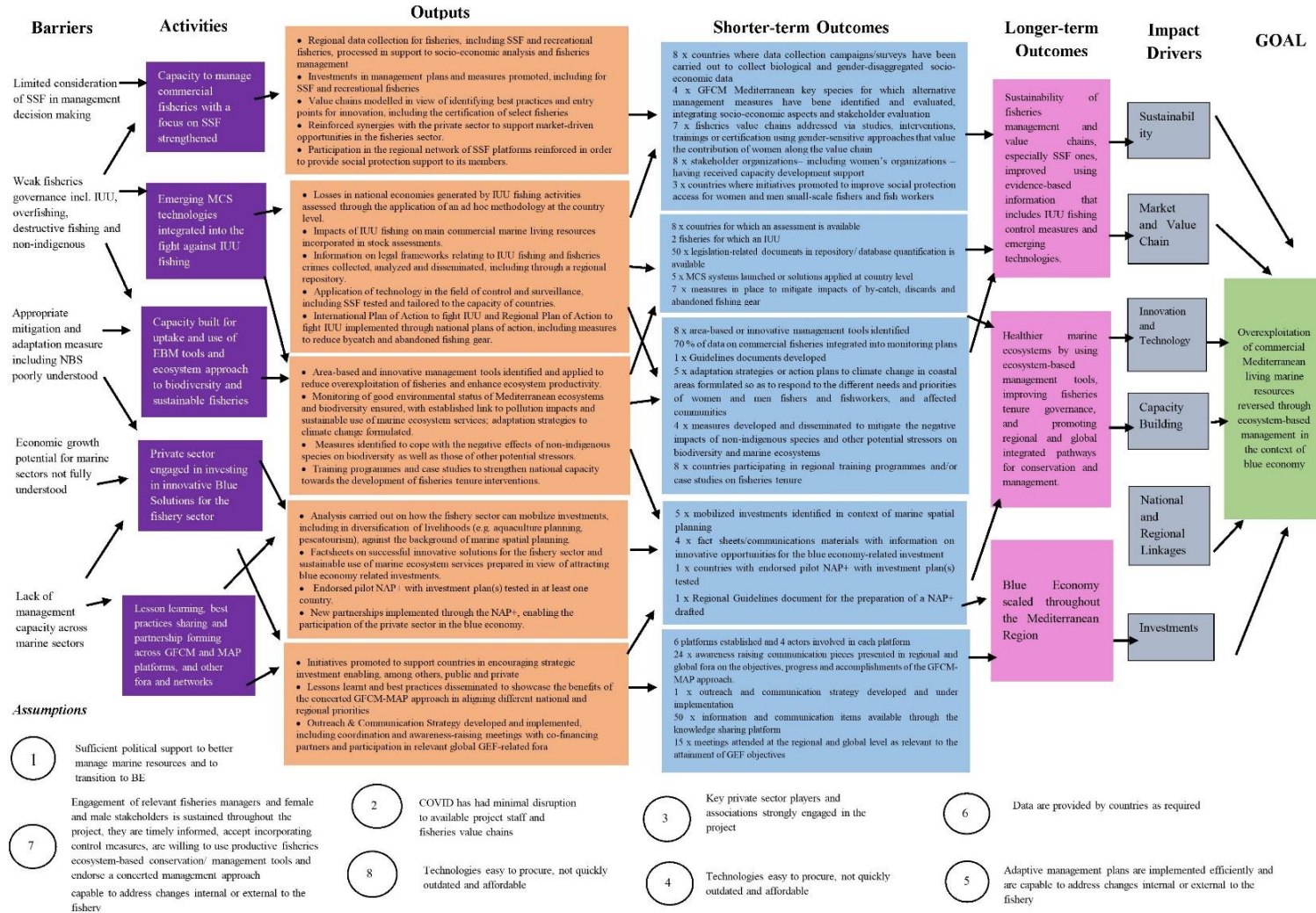
29. Combined these components comprise 21 Outputs and contribute to progress towards 5 Outcomes.

30. The project’s Theory of Change (ToC), as presented in the Project Document, depicts the immediate project outputs (direct products and services to be delivered by the project) and expected project outcomes (identified as ‘shorter term outcomes’) and sets out the project’s causal logic with assumptions and drivers on which the logic is based is shown in Figure 1 below.

31. However, the project’s ToC as presented in the Project Document is not coherent and suffers significant weaknesses. Indeed, it is best described as ‘confused’. Specifically, it presents:

- Some of the ‘longer-term outcomes’ are muddled combining the final environmental state that the project will contribute to, the means (project activities and outputs) to reach and statements of intermediate outcomes e.g. *‘healthier marine ecosystems [final environmental state] by using ecosystem-based management tools [project activities and outputs] improving fisheries tenure governance and promoting regional and global integrated pathways for conservation and management [project outcomes]’*;
- Some project outcomes are really a project output e.g. *‘regional guidelines document for the preparation of a NAP+ drafted’*;
- Some outcome indicators are largely indicators for achievement of the outputs (e.g. *‘8 x countries where data collection campaigns/surveys have been carried out to collect biological and gender-disaggregated socio-economic data’* is an indicator for output *‘regional data collection for fisheries, including SSF and recreational fisheries, processed in support to socio-economic analysis and fisheries management’*),
- Some output indicators are not well linked to output statements e.g. *Number of mobilized investments identified in context of marine spatial planning* is an indicator for output *‘Analysis carried out on how the fishery sector can mobilize investments, including in diversification of livelihoods (e.g. aquaculture planning, pescatourism), against the background of marine spatial planning’*;

Figure 1: Theory of change of the FishEBM MED project



- Some of the outputs are essentially outcomes, e.g. ‘International Plan of Action to fight IUU, and Regional Plan of Action to fight IUU implemented through national plans of action, including measures to reduce bycatch and abandoned fishing gearing (several outputs are contributing to addressing IUU);
- The ‘impact drivers’ are not explained. These are usually considered to be external forces, and it is not clear what some of those given in the ToC refer to as there is no accompanying narrative e.g. does the impact driver ‘*capacity building*’ refer to the capacity building efforts of the project or some external drive to boost capacity to address sustainable fisheries in the Mediterranean (and if so what?);
- Some of the assumptions presented in the ToC graphic are complex multiple assumptions e.g. ‘*Engagement of relevant fisheries management and female and male stakeholders is sustain(ed) throughout the project, they are timely informed, accept incorporating control measures, are willing to use productive fisheries ecosystem based conservation management tools and endorse a conservative management approach, capable to address changes internal or external to the fishery*’, or should be more accurately viewed as ‘preconditions’ for the project to operate rather than assumptions that need to be met to deliver longer-term outcomes e.g. ‘*Data are provided by countries as required*’; and
- The project also lacks a specific set of project management activities relating to Monitoring and Evaluation (M&E).

4. MTR key findings and MTR questions

32. The key findings respond to the main questions and sub-questions (see Annex 4) that address the MTR criteria of relevance, effectiveness, efficiency, sustainability, factors affecting performance, and cross-cutting dimensions, listed above (Box 1).

Relevance, cohesion and ownership

Key MTR question 1 - is the project relevant and coherent and does the project have high ownership?

Finding 1.1: The project is considered relevant by countries, GFCM and SAP/RAC and UNEP/MAP. At the national level – the project has helped fill important information gaps (e.g., on socioeconomics, fish stocks) as well as providing valuable capacity building and awareness-raising among stakeholders. At the regional level it is particularly relevant for GFCM where it fills in information gaps (notably national GFCM-Lex profiles) and addresses some of the priorities of GFCM 2030 Strategy, helps GFCM member states fulfil some of their national obligations, and it also supports UNEP/MAP’s Sustainable Development Strategy and Blue Economy priorities, and particularly supports for SPA/RAC’s focus on environmental monitoring.

Finding 1.2: However, the ‘ownership’ of the project is mixed. There was limited national stakeholder input to the project’s design, the project is not viewed as a high priority for some countries (rather seen more as addressing regional priorities of GFCM and UNEP/MAP), and there was a lack of understanding of the project among some national focal points when started. Also, the project aimed to ‘bring together fisheries and environment sectors’ to work together more closely in the Mediterranean but the ‘common ownership’ of project has not occurred at neither national nor regional levels.

(i) Relevance (Satisfactory)

33. The FishEBM Med project is highly relevant in relation to GEF, FAO and UNEP/MAP priorities and policies. It is in line with the GEF-7 International Waters Focal Area aims (it directly responds to IW Objective 1 “Strengthening Blue Economy opportunities”) and contributes to various Sustainable Development Goal (SDG) targets, especially those associated with SDG14 (Life below water) as well as the Post-2020 Biodiversity Framework.

34. The project continues to align well with FAO policies, priorities and strategies, although it mostly reflects fisheries management rather than Blue Economy (such as the FAO Blue Transformation Priority Programme Area) due to little activity to date on Blue Economy (mostly under Component 4 and largely executed by UNEP/MAP and SPA/RAC). FAO's priority was to employ the project to fill in gaps in Ecosystem Based Approach to fisheries management (although this concept is still not well understood in the region according to interviewees).
35. The project is particularly important for GFCM, helping to deliver its GFCM Regional Plan of Action for Small-Scale Fisheries in the Mediterranean and the Black Sea (2018), but also supporting delivery of the GFCM 2030 Strategy for Sustainable Fisheries and Aquaculture in the Mediterranean and the Black Sea. Importantly, it has provided a vehicle for GFCM at the regional level to better engage with more local level stakeholders, supporting local fishers through targeted actions and importantly helping to support countries' GFCM obligations.
36. The project is also considered relevant for UNEP/MAP within its overall MedProgramme, filling a gap addressing fisheries management in the SAP programme (complementary to SAP programme Child Projects), even though it is a relatively small project (UNEP/MAP budget US\$ 2,273,973 million, 31.3% of overall GEF funding). It directly responds to the UNEP/MAP Post2020 Strategic Action Programme for the Conservation of Mediterranean Marine and Coastal Biological Diversity (POST2020 SAP-BIO), UNEP/MAP Integrated Monitoring and Assessment Programme of the Mediterranean Sea and Coast and Related Assessment Criteria (IMAP), and pertinent SPA/BD Protocol Regional Action Plans. Initially, early in the design phase, the project was intended to have some activities within formally designated Marine Protected Areas (MPAs) in the Mediterranean and it aimed to support the Post-2020 Regional Strategy for Marine and Coastal Protected Areas (MCPAs) and other effective area-based conservation measures (OECMs) in the Mediterranean. However, no project activities have occurred within MPAs through UNEP/MAP and SPA/RAC led project activities but there has been some important delivery associated with Fisheries Restricted Areas (FRA, a form of OECM) so the project has been relevant for improving protected areas.
37. The project was considered highly relevant for many of the participating countries on issues of sustainable fisheries management, e.g. for filling information gaps (e.g., socio-economic - Lebanon), trawl selectivity trials (Tunisia), stock assessments (Lebanon), and SSF workshops on Non Indigenous Species (Morocco), as well as providing valuable capacity building and awareness-raising among stakeholders. Nevertheless, interviewees in Lebanon mentioned that the project is of less importance at present due to the conflict in the country. It was also clear from interviews that the project had not been sufficiently tailored to needs/priorities of individual countries due to very different contexts and capacities.
38. It may also potentially support existing national efforts e.g. ongoing Blue Economy strategies processes for Tunisia, Libya and Morocco, although the project has yet to demonstrate this. Some countries have especially benefited from the project, notably Albania and Montenegro where the project has helped to establish a Fisheries Restricted Area (FRA Otranto channel) and supported measures to address IUU fishing in Albania, Montenegro and Türkiye.
39. Fisheries elements of project are important and relevant according to the fisheries NFPs, but less clear from statements from the environmental NFPs made to the MTR. Indeed, many of the National Focal Points (NFP) for Environment were poorly informed about the project and its aims and have been little involved to date. Some environmental NFPs mentioned that the most relevant activities were the workshop on non-indigenous species and the workshop on the effects of climate change on coastal zone are relevant because both address issues that directly affect marine biodiversity and coastal ecosystems.
40. One environment NFP stated that the project was less relevant to the national agency's mandate as it was viewed more as a fishery project with little directly addressing wider marine environment issues.

Indeed, one NFP commented that the title of the project - FishEBM Mediterranean – clearly indicated it was a fisheries project. The poor delivery to date and small budget for environmental activities was also seen by the environmental NFPs as a reason for low interest and engagement by the environmental NFPs. It should also be noted that there is a difference in vision and approach over the management of fish populations in the Mediterranean between GFCM and UNEP/MAP, particularly regarding NIS. GFCM aims to ensure the conservation and sustainable use of living marine resources, whereas UNEP/MAP is more concerned with the sustainability of the overall Mediterranean marine environment particularly addressing threats to marine biodiversity. Particularly in the case of non-indigenous fish species, GFCM has an obligation to manage the species if fisheries are being used as a tool to address the NIS population, while UNEP/MAP focuses efforts on the reduction and elimination of NIS. Nevertheless, consideration of impacts on fish stocks from the wider environment, such as pollution impacts, is essential for effective fisheries management¹².

41. According to some of the MTR interviewees who had been involved in the project's design phase, UNEP/MAP and SPA/RAC were initially interested in activities to strengthen management in MPAs in the target countries, including addressing fisheries issues in MPAs. However, no specific activities were developed and there has been no focus on management on MPAs.

(ii) Ownership (Moderately Satisfactory)

42. The 'ownership' of the project, notably by the national authorities, is mixed. There was limited national stakeholder input to the project's design, and the project is not viewed as a high priority for some countries. Rather it was seen by some of the NFPs interviewed by the MTR as more addressing the regional priorities of GFCM and UNEP/MAP¹³.
43. MTR interviews revealed a widespread lack of understanding of the project among some NFPs particularly when it started, which has been largely addressed among the fisheries NFPs, but many of the environment NFPs still did not appear be familiar with the aims and details of the project. Whilst it is accepted that this may have been partly due to a turnover of NFPs, it also indicates that communication of key messages about the project especially on environmental aims and activities has been weak (see below). Several NFPs mentioned that there had not been adequate discussion at the design (PIF and PPG stages) on suggested national project activities and that the project was chiefly designed by an external team (see below). According to interviewees, countries provided 'shopping lists' of activities to be included, but there was too little discussion and agreement on these with the design team in 2019-2022, which led to different expectations on mixed understanding on what each country would receive from the project when it started.
44. The GEF was particularly keen that the project should 'bring together fisheries and environment sectors' in the Mediterranean to work together more closely but the 'common ownership' of project at neither national nor regional levels has not yet fully developed (see below).

The overall rating for relevance, coherence and ownership is **Satisfactory**.

¹² One reviewer commented that 'GFCM's mandate is for the "conservation and sustainable use of living marine resources". Economic issues come into play insofar as they influence the sustainable management of resources ("sustainable development" is only part of our mandate for aquaculture... we don't have an objective of developing/growing fisheries). Eradication of NIS is virtually impossible, which is why the GFCM doesn't use this term. Instead, commercializing edible NIS is one of the most effective adaptive strategies once a NIS is established. However, if fisheries are used as a tool to address NIS, then countries/the GFCM have an obligation to manage it (this may simply mean collecting data, without any particular catch restrictions). We promote market-based solutions for NIS because by developing a market for the species, demand increases and so does fishing pressure, contributing to controls on the NIS population, not because our objective is to maximize rent to fishers.

¹³ One reviewer noted that 'GFCM at least, does not independently establish regional priorities - it takes action on priorities established by its member countries in its various governing/technical bodies'. However, as pointed out there was a perception among some of the NFPs interviewed that the project was of more benefit to GFCM as an institution with its regional mandate (covering the whole of the Mediterranean).

4.1 Effectiveness

Key MTR question 2 - to what extent is the FishEBM MED project achieving its objectives? How effectively has the project delivered on its expected outputs to date, in terms of their quality, quantity and timeliness (against milestones)?

45. This section presents an assessment of the progress of key results for each of the five project Components up to 31 December 2025. The text below focuses on key issues and impacts for each Component identified during the MTR. A summary of the delivery of the all the outputs and outcomes is presented in Annex 6.

Component 1 - Strengthened capacity to manage commercial fisheries, with particular focus on Small Scale Fisheries (SSF)

Key findings

Finding 2.1: The collection of socioeconomic data is progressing. However, there is uncertainty over its use (although a GFCM WG is developing a 'roadmap' to address this). Other data collection, such as that from surveys-at-sea providing important information on fish stocks is helping to fill gaps, support stock assessment and to strengthen decision-making, and as a result the project's data collection activities are valued by stakeholders.

Finding 2.2: The Management Strategy Evaluation framework for data poor contexts is still being developed but has been piloted (for blackspot sea bream and is being developed for other data-limited species).

Finding 2.3: There have been significant delays with the project's value chains work due to the lack of a regionally harmonised approach and methodology, but the project has recently developed a new approach, which is being piloted (Sardinella, Lebanon and blue crab, Tunisia), although the target of 7 value chains developed before close of project is not realistic. However, the project's proposed activities relating to certification and fish handling training and product development have not been developed.

Finding 2.4: The stakeholder mapping exercise is still ongoing at mid-term, with delays in its completion. The information will be used to facilitate understanding and greater engagement of stakeholders in GFCM's management and decision-making processes, but its purpose and practical use remain unclear to participating countries.

Finding 2.5: Planned capacity needs assessments for SSF organizations were not carried out, and although some training was delivered (e.g. through SSF Forum workshop), support does not appear to be based on a systematic identification of needs.

Outcome 1: Fisheries managers and stakeholders use sound information generated on the status of key commercial fisheries to support improved management and selected value chain interventions, particularly for SSF, in view of maximizing the sustainability of production

This component which centers on standardising and gathering data in the Mediterranean Sea and developing methodologies and protocols is a major focus of the project.

Output 1.1: Regional data collection for fisheries, including SSF and recreational fisheries, processed in support to socioeconomic analysis and fisheries management (including gender-disaggregated data collection) (led by GFCM)

(i) Socioeconomic data collection

46. The collection of national socio-economic data collection has been a key focus for the project to help GFCM and its member countries better understand the social and economic context of fisheries in the Mediterranean. GFCM has developed some useful templates and guidance on the data collection to standardise the process and which will help build capacity in the participating countries in the future.
47. The socioeconomic data collection exercise has been progressing but is not yet complete, apart from Türkiye (in collaboration with Sür-Koop). It is underway in Lebanon (in collaboration with the MOA) and in Tunisia (in collaboration with INSTM).
48. Feedback from interviewees indicated that more guidance would have been valuable on how to collect the data as there were challenges over gathering financial data from individuals or information on where they were fishing as well as collecting personal economic/financial data. There was a similar response from interviewees to this activity on the FishEBM Black Sea project and suggests that sharing experience with the FishEBM Black Sea project and other countries and updating guidance on how to build trust would be valuable.
49. Interviewees also expressed confusion and uncertainty over the how the socio-economic data gathered would be integrated into fisheries management decision-making – what is process, how would data be incorporated, how much weight should be given to socioeconomic data in management decisions, etc (again this was the case for the FishEBM Black Sea project). Also, it was unclear whether the data is being provided (and will be used) in broader national socioeconomic data sets and national statistics. However, the MTR understands that the GFCM has established a WG to develop a ‘roadmap’ and guidance for the use of such data which was due to convene in April 2026 so hopefully there will be guidance provided to the fisheries agencies before the end of the project¹⁴.
50. The data collected will also be valuable for the value chain work (Output 1.3) such as on sardinella in Lebanon and blue crab in Tunisia where the associated socioeconomic studies will need to be undertaken including gathering information on potential market opportunities and social acceptance.
51. As well as the national socioeconomic data collection, the project has also collected socioeconomic data as part of its activities focused on supporting the establishment of the Otranto Channel FRA in Albania, including stakeholder discussions and collection of data as part of a Local Ecological Knowledge (LEK) study to assess the potential impacts of the proposed trawl ban to protect bamboo coral (*Isidella elongata*) habitat.

(ii) Other relevant fisheries management data collection

52. As part of the data collection the project has supported several surveys-at-sea to gain a better understanding of the regional fish stocks of commercial species. These include an exploratory survey-at-sea in Lebanon (undertaken in 2023 and 2025) and a demersal survey-at-sea in Algerian waters (in 2023). Equipment has also been installed to enable pelagic acoustic survey-at-sea surveys in Algeria (foreseen for May 2026).
53. Overall, the project has clearly improved knowledge for key fisheries management issues in the Mediterranean Sea (e.g. more reliable data for stock assessments). However, it is unclear whether there is a long-term commitment to collecting such data, e.g., demersal survey data, due to long-term funding issues. In addition, at the MTR point this information still needed to feed into management planning process (Output 1.2) which is ongoing.

¹⁴At a GFCM session held in November 2025, all countries insisted on integrating socio-economic data more effectively and not just creating and maintaining a descriptive database. The final report of the working group addressing this is expected to be ready in 2027.

54. As an indirect benefit the socioeconomic questionnaires helped raised awareness among stakeholder groups, scientists, and fisheries organisations and has helped to build capacity to undertake data collection and analysis.

(iii) Regional use of data collected through project

55. At regional level, the data collected through this Output will feed into GFCM databases and be used as part of the analysis for future State of Mediterranean and Black Sea Fisheries (SoMFi) reports¹⁵.

Output 1.2: Investments in management plans and measures promoted, including for SSF and recreational fisheries (led by GFCM)

56. The project has supported the development of a Management Strategy Evaluation (MSE) framework for management decisions on data-poor fish stocks. A tiered framework has been endorsed, with a 'MSE-lite' version developed and piloted for one species blackspot sea bream, although others are planned before the end of the project. This is seen as a useful development by MTR interviewees as data for many Mediterranean fish stocks is poor. The framework continues to be developed with expected testing for other species such as sardinella.
57. Importantly, the project has sought to engage stakeholders in the management processes where possible, although this has been limited. The most significant of these has been the socioeconomic study and stakeholder consultation undertaken as part of the support to establish the Otranto Channel FRA. Strategic guidance on stakeholder engagement in management has also been developed and presented to the GFCM SAC.
58. It is unclear at the MTR point what will be delivered through this output by the official end of the project (December 2026) and this output may need an extension to ensure full delivery.

Output 1.3: Value chains modelled in view of identifying best practices and entry points for innovation, including the certification of select fisheries (led by GFCM)

(i) Value chain work

59. The project's activities addressing fisheries value chains were delayed due to a lack of agreement on the methodology for data collection. Movement on this required authorisation from the relevant GFCM Working Group at an annual session and approval to develop a common data collection methodology (for both the FishEBM Med and Black Sea projects) and was only finally given by GFCM in November 2024. The preparation of a harmonized regional methodology for data collection and analysis of fisheries and aquaculture value chains, as well development of associated training, is currently underway. A first draft of common regional value chain data collection methodology and a concept note was discussed with GFCM Technical Advisory Group on Value Chain and Market Access (TAG-VCMA) on 5 June 2025 (online), and training on the methodology and its implementation began in mid-2025. The methodological approach was being reviewed by GFCM statutory bodies (Scientific Advisory Committee on Fisheries (SAC), Scientific Advisory Committee on Aquaculture (CAQ) and the Working group of the Black Sea as of December 2025.
60. The original methodology proposed and agreed at the PPG stage (informed by the FAO Fish4ACP project) was considered too complicated so an alternative simpler 3-phase approach. However, this will only focus on the first (data collection) and second (analysis) phases, and not the third (value chain

¹⁵ FAO. 2025. *The State of Mediterranean and Black Sea Fisheries 2025*. General Fisheries Commission for the Mediterranean. Rome. <https://openknowledge.fao.org/items/a4b60529-906f-4c6b-a671-c91f9f827564>

development plan) elements due to lack of time before the end of the project and because the methodology needs to be tested (at the MTR point).

61. Up to the MTR, only a pilot study for round sardinella in Lebanon has been carried out (other pilots may be possible before the end of the project, with possible pilots including deep water red shrimp or blue crab in Tunisia), and this was only a consumer preference study – no market development involving the private sector, distributors and investors has yet taken place. However, project activities focused on addressing the lionfish – a non-indigenous species - under Component 3 have included measures to strengthen a value chain connected with this species (see below).
62. In the MTR's opinion, the target of 7 value chains to be developed by the project set at the design stage was not realistic. Experience of fisheries value chain development in other regions (of which FAO has considerable experience) shows that such exercises require significant time and resource investment if they are to be successful. In the MTR's view the value chain element of the project should have been treated either as a much more significant element of the project (a whole component) with a much larger dedicated budget or left for a follow up project especially because the basic fisheries information, such as stock assessment data is poor or lacking for many species in the coastal waters of the participating countries.
63. It is expected that a decision on the final value chain methodology will be made in the summer of 2026. However, this will only be a few months before the official end of the project, so there will not be time to apply the methodology widely, consequently, there will not be any significant investment in value chain development by the end of the project. In addition, there is a need to clarify with national partners how to use results from value chain studies in the decision-making process for fisheries management.
64. It should be noted that GFCM has had relatively little experience of value chain analysis and development prior to the project. However, FAO does have that experience and should perhaps have provided greater dedicated technical guidance on this issue to the project design team during the PIF and PPG processes to ensure a realistic design (including realistic budget) and to GFCM once the project began.

(ii) Certification of fisheries

65. The project's proposed actions to develop and roll out a framework for catch certification schemes for selected fisheries in the Mediterranean has not been developed. Apparently, this project activity was proposed at the design stage but in the MTR's view was always unrealistic given the status and knowledge of Mediterranean fisheries, the feasibility of undertaking a recognised certification process (e.g., Marine Stewardship Certification), and the likely cost (including future costs to maintain certification status). There is also the issue of whether any costs of this project element should have been covered by the private sector.
66. The MTR suggests that this Output is revised and the certification element is dropped by the project (reflected in revised Results Framework).

Output 1.4: Reinforced synergies with the private sector to support market-driven opportunities in the fisheries sector (led by GFCM)

(i) Establishment of a stakeholder mapping

67. The project aims to map relevant stakeholder groups across the fisheries sector, including SSF producer organizations, women's organizations, and fish processing and marketing actors. Detailed

information on key stakeholders for fisheries for GFCM did not exist prior to the project, and direct engagement with stakeholders is still relatively new to GFCM.

68. According to the Project Progress Report 2025, the mapping exercise is intended to support the integration of stakeholders' information into GFCM regional-level management work and provide information to populate an expanded stakeholder database as well as supporting national agencies in their interactions with fisher groups. However, it is still ongoing at mid-term, and its practical use remains unclear to participating countries.
69. At the GFCM level, interviews indicate uncertainty over the definition and scope of "stakeholders" within the project. GFCM traditionally works through national focal points and governmental institutions rather than directly with local stakeholder groups, such as fishers or community organizations. Consequently, the project's intention to engage more directly with local fisheries actors represents a relatively new approach for the Commission. While this offers an opportunity to strengthen local engagement, it has also created some ambiguity regarding which actors should be considered key stakeholders and how they should be engaged.
70. At the country level, stakeholder identification has progressed unevenly. In several cases, project teams and national partners have a good practical understanding of key stakeholders, but this knowledge has not yet been systematically captured through the mapping exercise. In Türkiye, for instance, the structure of fisheries stakeholders is relatively well established, with national organizations representing fisher cooperatives and facilitating engagement with authorities, although questions remain regarding the inclusiveness of representation, particularly for women and less visible groups. In contrast, stakeholder identification is more complex in other countries, particularly where the fisheries sector is less formally organized and data on small-scale fisheries operators are incomplete due to the absence of reporting requirements. As noted by a key interviewee, while a stakeholder analysis was conducted, it did not fully capture these structural gaps, nor the absence or limited presence of potential partners in some country contexts.

(ii) Stakeholders' capacity assessment and adapted guidance and trainings

71. The project planned to assess the capacity development needs of selected SSF organizations, including women's organizations, and to tailor support and training accordingly. However, no systematic capacity needs assessment appears to have been conducted (it is expected after the stakeholder mapping exercise is complete), and it is unlikely that this will be completed before the end of the project. While the PPR 2025 indicates that 30 organizations received capacity development support, such as through the SSF Forum workshop on market-based solutions for non-indigenous species (NIS) (November 2023, Türkiye), these efforts do not appear to be based on a structured assessment of needs, and no detail is given on whether such 'capacity support' was used or had any impact.

Output 1.5: Participation in the regional network of SSF platforms reinforced in order to provide social protection support to its members (led by GFCM)

72. There have been no project field-based activities to address social protection in fisher communities, and no direct support has been provided to strengthen the role of the SSF platforms in securing greater access to social protection as proposed in the Project Document. Instead, social protection issues have been promoted by the project, but this has largely focused on assessing gaps in social protection programming at the national level and gathering information on related legislation (through questionnaire sent to the participating countries) under Component 2. The information received was incorporated into a section of the GFCM-Lex repository on social protection related legislation, which is nevertheless a useful contribution.
73. In addition, it should be noted that the socio-economic data collection data undertaken under Output 1.1 provides an important baseline to develop such work in the future.

74. Project activities addressing social protection was not viewed as a priority by the fisheries agencies, and this element does not appear to have been introduced to the project by the participating countries. In the MTR's opinion, this element of the project should be discontinued.

Component 2: Enhanced integration of emerging monitoring, control and surveillance technologies in the fight against IUU fishing

Finding 2.6: The collection of data on economic losses due to IUU and the scale and impacts of IUU fishing in the waters of the participating countries has not been undertaken due to delays on agreement over a common methodology to collect such data. However, a simpler 'alternative approach' was being developed at the MTR point which was to be piloted before end of project.

Finding 2.7: The project has facilitated some an important updating and expansion of information on legal frameworks held within the GFCM-Lex database. This has included assessment of legislative gaps that needs to be filled to address IUU fishing in 8 of the 9 countries (not Bosnia Herzegovina). However, all participating countries still require national amendments to ensure wider uptake of IUU measures (varies by country).

Finding 2.8: There has been good progress on rolling out VMS technology in Montenegro and Albania (where it has been piloted) and valuable support to Türkiye at the MTR point, along with capacity building for MCS through workshops and training (including in the field).

Finding 2.9. The development of NPOA-IUU has advanced but it is likely that only one NPOA-IUU will be formerly approved before the end of the project (probably for Albania but also possibly for Türkiye). Some planned project measures associated with addressing IUU fishing, e.g., 'buy-back' schemes for old fishing gear, have not been undertaken and are unlikely, although the project has undertaken some valuable awareness-raising activities on measures to tackle 'ghost gear' and there is a the possibility of an innovative pilot to retrieve ALDFG in Morocco working with local fisher groups.

Outcome 2: Fisheries management better accounts for the quantity and magnitude of IUU fishing in the Black Sea and incorporates control measures, including through the use of emerging technologies

75. Parts of Component 2 are considered particularly relevant for many of the countries and partners in the project.

Output 2.1: Losses in national economies generated by IUU fishing activities assessed through the application of an ad hoc methodology at the country level and Output 2.2: Impacts of IUU fishing on main commercial marine living resources incorporated in stock assessments. (both led by GFCM)

76. There has been no assessment of the national economic losses of IUU fishing activities (Output 2.1) nor direct assessment of the impacts of IUU fishing on the main commercial marine living resources (Output 2.2) in any of the participating countries through the project. This was partly due to a lack of agreement on the appropriate methodology for quantifying IUU fishing and the use of results when the project started (despite agreement at the design stage)¹⁶. The initial approach was considered too complex and difficult to apply in the region, elements were unrealistic and poorly considered at the design stage. For instance, the proposed activity to 'create an IUU spatial risk assessment framework applicable to the whole Mediterranean and obtain an independent estimate of fishing vessel activity to determine the magnitude of IUU fishing' was always unrealistic, especially given the poorly known and clandestine nature of illegal fishing.

¹⁶ According to the GFCM, the timeline for earlier discussions on the adoption of the IUU assessment and methodology to be used by the project was as follows: (i) following a request by the GFCM41 (2017), during the 2017- 2018 intersession, a workplan/roadmap and general methodology were developed towards the scientific estimation of IUU fishing in the Mediterranean and Black Sea; (ii) this workplan foresaw six activities and was presented to the SAC20, WGBS7 and the GFCM 42 in 2018 that endorsed it and the roll out of Activities 1 – 3; as a result the development of Activity 3 advanced significantly (iii) the COVID19 pandemic caused a halt in the work because the roll-out of Activity 3 required in-person workshops; (iv) to ensure its continuation, the work was included in the GEF-EBM projects; the workplan was revised and modernised and presented to the SAC24 and GFCM 46 in 2023. They both requested a complete overhaul of the methodology.

77. Following the request of the contracting parties at the GFCM SAC to revisit the originally envisaged methodology (which resulted in the Output being put on hold for the first two years of the project – it is unclear why it should have taken two years to arrive at a decision. Apparently, this was due to ‘political sensitivities associated with the activity’¹⁷, nevertheless in the MTR’s opinion, a decision could probably have been taken sooner. At the project’s 2025 Steering Committee meeting it was finally agreed that a revised, stepwise approach (‘roadmap’) that emphasizes developing capacity to quantify IUU fishing, with a view to better understanding and adapting to limitations and specificities in the region should be adopted. The training on IUU assessment methodologies was due to take place in early 2026. Consequently, the project’s target to ‘quantify IUU’ is unlikely for any of the countries before the close of the project (although it was advancing at the MTR point in Albania and Türkiye).
78. There is a proposal to pilot the approach and quantify IUU fishing for a limited number of select fisheries in 2026 to be used as a proof of concept to promote future replication, although it is uncertain what can really be achieved before December 2026 and this element of the project would benefit from a 6-month NCE. Nevertheless, an agreed methodology and capacity to undertake IUU assessment would represent important contribution towards addressing IUU fishing in the Mediterranean given the baseline.
79. The collection of data on national economic losses due to IUU has not been delivered but was probably also an unrealistic expectation as accurate information on this subject is notoriously difficult to collect anywhere in the world according to one MTR interviewee (and indeed existing estimates tend to be more ‘guesstimates’).
80. Instead, another activity is reported under this Output - an assessment of legislative gaps, contributing to IUU fishing, has been carried out by the project for 8 countries (Algeria, Albania, Lebanon, Libya, Montenegro, Morocco, Tunisia and Türkiye). However, it should be noted that assessing ‘legislative gaps’ is not the intended focus of Outputs 2.1 and 2.2 but given that assessing the scale and impacts of IUU fishing accurately is notoriously difficult, the MTR believes that as a practical alternative and as an analysis which is needed to support measures to address IUU fishing, the decision to focus on legislative information was a sensible choice (and in the MTR’s view the feasibility of Outputs 2.1 and 2.2 were probably not properly considered during the design phase and based on untested assumptions).

Output 2.3: Information on legal frameworks relating to IUU fishing and fisheries crimes collected, analyzed and disseminated, including through a regional repository (led by GFCM)

81. Delivery of this project output has been one of the most successful to date. GFCM-Lex profiles have been finalized and work has progressed towards the publication of the GFCM-Lex online platform. Some 150 legislation-related documents have been produced and are now available for the GFCM repository/database, which is three times the end-of-project target level. The project also delivered targeted capacity building such as a workshop on “Training toward strengthening national legislation in relation to GFCM recommendations” held in 2024¹⁸, including session dedicated to reviewing national legislation and identifying gaps to address IUU fishing, and a GFCM-LEX final workshop was held in 2025. The training brought together representatives from beneficiary countries to assess progress in transposing GFCM decisions into national legal frameworks, identify legislative gaps, and support the development of national plans of action (e.g. on IUU fishing). It also contributed to the development of the GFCM-Lex repository and facilitated exchanges on issues such as Abandoned, Lost, or otherwise Discarded Fishing Gear (ALDFG) and communication approaches to raise awareness among fishers. This capacity building was highly valued with one MTE interviewee commenting that “there were experts listening to you regarding legislation and these opportunities are rare”.

¹⁷ GFCM clarified that ‘The PSC waited to see if SAC would take a decision on this (to avoid that the project embarked on one approach and then the SAC took a decision on the need to go in a different direction) but the SAC kept postponing a decision on this (owing to the political sensitivities of the activity). After two years of no SAC decision, the PSC agreed to proceed with its revised approach.

¹⁸ GFCM. 2024. Back to Office report: training towards strengthening national legislation in relation to GFCM recommendations in Italy, Naples, 20 to 24 October 2024

82. However, although the benefit to GFCM is clear (updated information on which to base GFCM decisions), according to MTR interviewees it is less clear whether the countries see the value of the updated database. This uncertainty should probably be addressed by GFCM engaging more with its national partners on how this information will benefit them and through further targeted support to help them draft updated national legislation to address IUU fishing.
83. By the end of the project all participating countries will have an updated national profile on the GFCM Lex database, but feedback to the MTR suggests that there needs to be more involvement from the countries to take ownership of that profile and move forward changes in their legislation (mostly in relation to compliance requirements of GFCM membership). Gaps have been identified in national legislations and national agencies need to work on these.

Output 2.4: Application of technology in the field of control and surveillance, including small-scale fishing, tested and tailored to the capacity of countries. (led by GFCM)

84. This is another project Output which is being successfully delivered by the project at the mid-term point. The project's Monitoring Control and Surveillance (MCS) related activities have focused largely on strengthening the Vessel Monitoring Scheme (VMS) system in Montenegro, Albania and Türkiye. Eight MCS technology solutions had been piloted to assess the feasibility and performance of relevant technologies under national conditions (five were applied in Montenegro (i.e. BlueTraker, Loqus, Satlink, Succorfish and PinPoint) and, in coordination with the sister FishEBM Black Sea project, an additional three (CLS, Globalstar and OrbComm) were applied in Türkiye (Mediterranean and Black Sea). Selected VMS technologies were being finalized for Montenegro and Albania by December 2025 and hardware support was being provided to Türkiye for digital processing and data exchange facilitating MCS (strengthening of VMS system for industrial fisheries in the Black Sea has been a major focus of activities under the Fish EBM Black Sea project). Associated with this, various capacity building activities have been undertaken by the project team including the development of MCS tools for the Mediterranean (in coordination with Global Fishing Watch), and training on new MCS technology (e.g. drones). There has also been a focus on investigating the potential use of gear sensors to address some aspects of IUU fishing, including a desk study on variants of gear sensors and associated companion monitoring assets that may be appropriate for respective national scenarios, and at the MTR point a gear sensor pilot study was underway in Montenegro. One of the reasons for the success has been the high commitment from the fisheries agencies in Montenegro, Albania and Türkiye which view MCS as particularly important for sustainable fisheries management.
85. MTR interviewees commented that colleagues were very satisfied with the support and opportunities offered under this output, especially because field visits and practical demonstrations were included (viewed as the best way of learning).
86. However, there is still a question over whether all the planned upgrades can be achieved by the end of the GEF project (end 2026) and this Output would benefit from a short extension (option for 6-month No Cost Extension). Also, if possible, additional resources should be made available to ensure that devices are fully fitted and providing data that is integrated into management decision-making process, staff are fully trained and the maintenance/servicing arrangements are running smoothly, and there is a long-term funded sustainability plan in place for each country. It would also allow time for capturing important lessons and dissemination (including exchanging experiences with the FishEBM Black Sea project).

Output 2.5: International Plan of Action to Fight IUU and Regional Plan of Action to Fight IUU implemented through national plans of actions, including measures to reduce bycatch and abandoned fishing gear. (led by GFCM)

87. At the design stage, the project proposed that National Plans of Action – Illegal, Unreported and Unregulated fishing (NPOA-IUU) would be developed for 7 of the participating countries. These are considered important as adoption of such plans commits countries to develop effective measures to address all aspects of IUU fishing. However, at the MTR point, no NPOA-IUU had been approved although there was an expectation that the NPOA-IUU for Albania and possibly a draft NPOA-IUU for Türkiye would be finalised and endorsed by the end 2026.
88. To date, some relevant baseline information has been collected with a review of existing NPOA-IUUs, along with related national legislation on MCS measures (under Output 2.3), and a useful toolkit developed to support the formulation of NPOA-IUU, based on the GFCM RPOA-IUU and regional standards.
89. Other project activities carried out under this output include an assessment of the status of the management of fishing gears at national level (marking, recycling, facilities at port), and the publication of a well-received graphic novel on Abandoned, Lost or Otherwise Discarded Fishing Gear (ALDFG) impacts and gear marking to improve knowledge and raise awareness on the threats posed by IUU fishing and measures to address it. In addition, the project has promoted other measures to mitigate the impacts of bycatch, discards and ALDFG with activities launched (but not yet completed) in Türkiye on bycatch mitigation, and in Albania on discards monitoring. Furthermore, in Morocco there is an innovative initiative to retrieve ALDFG with local fisher communities, which may provide valuable lessons learned and an extensive write up, although how much can be delivered by the end of 2026 is uncertain and this element of the project would also justify a short NCE.
90. However, some planned project measures associated with this Output, such as ‘buy-back’ schemes for old fishing gear have not been undertaken and are unlikely (they were probably unrealistic at the design phase). Consequently, some of the activity sets associated with this Output need to be revised and dropped from the project.

Component 3: Integrated ecosystem-based management tools and ecosystem approach to fisheries

Finding 2.10: The project has had mixed success with applying area-based management tools. The project has provided significant and important support towards the establishment of a new FRA in the Adriatic Sea (Otranto Channel) including an important stakeholder engagement process, but there have been no direct project activities in officially designed MPAs (as envisaged at the design stage).

Finding 2.11: The project has provided valuable support for the assessment of the status of vulnerable benthic ecosystems (through survey work, e.g. in Albania and Montenegro), including the piloting of the use of eDNA metabarcoding approach (in Türkiye) to identify vulnerable species in marine systems, which is innovative.

Finding 2.12: The outputs addressing monitoring of good environmental status (Output 3.2) and measures to address negative effects of NIS on biodiversity as well as those of other potential stressors (Output 3.3) have many activities which address a wide range of issues but do not form a coherent whole. The extent of delivery of some of these activities at the MTR point is also unclear along with the likely impact and extent of follow-up in some cases. To date delivery under Output 3.2, has been mostly reports, e.g., on analysis related to IMAP and a Climate Change Adaptation (CCA) workshop was delivered but development of *national/local climate change adaptation strategies or action plans* seems unlikely. There was also initial confusion over which organisation had responsibility for some activities (e.g., SPA/RAC providing fisheries-related data for IMAP but later agreed that GFCM has the remit),

Finding 2.1.3: The project’s activities in relation to mitigate the negative effects of NIS (Output 3.3) have also been limited up to the MTR, with for instance the delivery of ‘baseline studies and monitoring and assessment programmes’ unclear (planned for 2026). Two species - Lionfish and Blue Crab - have provided a focus for NIS activities but mostly in relation to supporting potential local markets for these species.

However, a useful workshop and guidance document on potential control measures for NIS have been produced but it is unlikely that any proposed NIS control measures will be in place before end of project. Project activities to address fisheries tenure issues were minimal and not a priority for most countries.

Finding 2.1.4: The project has delivered a significant number of reports under Outputs 3.2 and 3.3, but it is unclear if the recommendations have been adopted and are being employed (integration into existing practice or reports just 'sitting on shelf'?). Also, although the integration of fisheries was intended to be a central feature of many of the activities under Outputs 3.2 and 3.3, there has been very limited involvement of either GFCM or the fisheries NFPs in some of the activity sets (e.g. the CCA workshop).

Outcome 3. Healthier marine ecosystems with more productive fisheries in place, through the synergistic application of ecosystem-based conservation/ management tools and improvements in fisheries tenure governance

91. Along with Component 4, Component 3 was considered the lowest priority of the five project Components by the participating fisheries agencies. Component 3 also has among the lowest delivery in terms of project deliverables. Indeed, relatively little had been achieved under Component 3 by the MTR point.

Output 3.1: Area-based and innovative management tools identified and applied to reduce overexploitation of fisheries and enhance ecosystem productivity. (led by GFCM)

92. Four management tools have been applied at the MTR point, supporting enhanced area-based and ecosystem-based conservation efforts. The most important project contribution delivered under this Output has been the support to the creation of a Fisheries Restricted Area (FRA) in the Otranto Channel in the Adriatic Sea, which was established in November 2024. The project supported a ROV survey, socioeconomic assessment and stakeholder consultation in assessing sensitive benthic habitats comprising *Isidella elongata* in GSA 18 (Albania) and the potential impacts of the closures. The stakeholder consultation process undertaken by the project, including assessing the value and use of the area for local fisher groups, capturing their knowledge on fishing practices, resource trends, and environmental changes and discussing the proposals to create the FRA with local fisher groups and tailoring the design based in part on their feedback, was viewed as particularly important, and contributed to a better understanding of fisheries¹⁹. In the MTR's view, the process of, and experiences and lessons gained from this exercise should be captured in a dedicated document, perhaps as an experience note for IW:Learn distribution.

93. In addition to protecting bamboo coral forests (*Isidella elongata*) which form a vulnerable marine ecosystem, the FRA also protects essential fish habitats (nurseries and spawning grounds) for deep-water red shrimp, European hake and Norway lobster, and the creation of this FRA contributes towards achieving the global 30x30 target. Based on the project experiences and results Algeria and Morocco have also expressed an interest in establishing an FRA.

94. However, there have been no project activities that have sought to strengthen the management of Marine Protected Areas (MPAs) which was proposed at the design stage (and specific MPAs were identified in the GEF Core Indicator Worksheet – see below). These project activities were to be undertaken through the UNEP/MAP led work under this Output and have been reported on in annual PIRs but UNEP/MAP and SPA/RAC have not undertaken any specific activities in these areas. It could be argued that other SPA/RAC led project activities such as the CCA workshop will potentially benefit these areas through improved guidance but at the MTR point there were no specific activities within MPAs, and indeed the Project Document does not give any detail on planned activities. Consequently, it seems that there was some confusion over this issue at the design phase which was not resolved

¹⁹ GFCM. Pilot study on *Isidella Elongata* in the southern Adriatic Sea, socioeconomic and local ecological knowledge (LEK) analysis. Albania and Italia. 29 May 2024

(the project SC did not question this for instance). Activities in MPAs were probably proposed because they are a special focus for SPA/RAC).

95. Other 'innovative' tools to inform more holistic management were also tested by the project included the piloting the use of DNA metabarcoding to qualitatively correlate eDNA to the presence and abundance of species during different fishing activities (piloted in Türkiye). Although still at an early stage (globally) the technology (particularly if linked with relevant databases) has the potential to support wider identification and assessment of vulnerable species and ecosystems (the approach can identify species (composition) but not yet abundance), and in the future may be of utility in providing key marine biodiversity data for other key stakeholders, e.g., environment ministries and national and international non-governmental organisations (NGOs). It may be especially useful for assessing vulnerable marine ecosystems and deep-water species which are challenging to survey. The project is publishing a protocol on this technique (undertaken jointly with the FishEBM Black Sea project), which among other things discusses the type of gear to use. However, it would also be worth documenting the project's experiences with eDNA metabarcoding (data collection and analysis) in a separate publication for more general audiences (again perhaps as an IW:learn Experience Note). Among the participating countries, interviewees in Türkiye and Algeria expressed most interest in the eDNA technique and the project should consider further piloting in these countries if funding is available. Unfortunately, while data collection is relatively cheap, the analysis of the eDNA collected is currently expensive, and as mentioned the technique cannot reliably assess species abundance at present so it is still limited as a survey method.
96. The project has also funded a pilot study on underwater noise impacts of commercial trawl fisheries (Albania) and a data collection exercise on sensitive benthic habitats and species in Albania and Montenegro, and the project has provided support to participation of experts to an expert group on vulnerable marine ecosystems and essential fish habitats.
97. It should be noted that several MTR interviewees commented that the pilot studies to trial gear to 'fish for litter' and the survey to evaluate the noise emitted by bottom trawlers and its propagation on the sea bottom were not considered priorities (and had little or no ownership by most participating countries). However, the proposal to undertake technical trials using innovative 'fishing for litter' gear²⁰ to collect information on the interaction between marine litter and fisheries in relevant countries would be innovative and may be worth a small pilot. Indeed, interest has been expressed by the governments of Morocco and Türkiye. The planned activity would involve local fisher groups (who are concerned about the issue) which would also support awareness-raising, sustainability of efforts, and promote relationships between the fisheries administration and the fisher community so has additional value. However, it is unclear how, if this 'fishing for litter' was successful, the litter would be disposed of in an environmentally sensitive manner, or it will just move the problem from the marine to terrestrial system (potential just to landfill sites). The MTR is not aware whether a clear plan for how (and with what resources) any litter collected would be disposed of on land has been developed if this project activity set is taken forward.

Output 3.2: Monitoring of good environmental status for commercial fisheries ensured and adaptation strategies to climate change formulated. (led by UNEP/MAP and SPA/RAC)

98. A specific activity under this Output was to integrate data on commercial fisheries into UNEP/MAP monitoring plans, specifically the Integrated Monitoring and Assessment Programme of the Mediterranean Sea and Coast and Related Assessment Criteria (IMAP) and was to be undertaken by UNEP/MAP and SPA/RAC. However, as fisheries data collection falls under GFCM exclusive mandate,

²⁰ The Project Document states that the project will 'Develop and implement pilot studies, including technical trials using innovative "fishing for litter" gear, to collect information on the interaction between marine litter and fisheries in relevant countries, including technical trials'.

this activity was judged no longer relevant when the project started (there seems to have been a misunderstanding over which organization had responsibility during the design phase). Consequently, as an alternative it was proposed to develop a Compendium of Good Practices for the environment–fisheries interface, clarifying mandates and areas of collaboration, followed by a Joint Coordination Meeting with NFPs from GFCM and SPA/RAC to align strategies and validate the Compendium (this was not undertaken during the period to the end of the MTR but has been proposed for 2026). It is also proposed to provide technical assistance to interested partner countries to improve their capacity for collecting data on incidentally caught vulnerable species. To date this has included support for 6 initiatives for data management and identification of vulnerable species in Montenegro and Albania²¹.

99. Another activity under this Output is the development of guidelines for the integration of the contribution to the Good Environmental Status of marine waters and marine ecosystem by commercial fisheries data into in national monitoring plans. These have yet to be developed, although supportive baseline assessments - *The identified relations between different Integrated Monitoring and Assessment Programme of the Mediterranean Sea and Coast and Related Assessment Criteria (IMAP) indicators: focus on interrelations with fisheries* and *Comparative analysis of the GFCM and IMAP reporting frameworks related to the contribution of commercial fisheries and incidentally caught vulnerable species to Good Environmental Status* have been produced and provide a base for future work on the Guidelines. These studies identified key areas of convergence between fisheries and environmental monitoring systems.
100. In terms of the project's proposed activities supporting '*formulating adaptation strategies for climate change*', no adaptation strategies or action plans to address climate change in coastal areas had been formulated. A preliminary regional workshop on '*Nature Based solutions and Climate Change Adaptation Strategies for Coastal and Marine Ecosystems*' was held in December 2025 in Türkiye, with the participation of 12 countries (8 of which were project beneficiary countries), but as of 31 December 2025 the outcomes of the workshop had not been published or reported on. SPA/RAC interviewees stated that five adaptation strategies and/or action plan(s) are expected to be delivered by the end of project (for Morocco, Tunisia, Libya, Lebanon, Montenegro), although in the MTR's view this seems unlikely as none have yet been drafted and they would need to have discussion, revision and the formal endorsement by national authorities which is likely to be a lengthy and uncertain process. In addition, a key feature of these CCA plans was to consider 'issues affecting the commercial fisheries sector in the Mediterranean area' but none of the fisheries NFPs were involved in the workshop and GFCM was barely consulted on the scope, design, execution, or participation of the workshop and development of the associated regional guidelines or CCA strategies. In relation to this, whilst there is a recognition that climate change is impacting fisheries in the Mediterranean and CCA strategies are needed to address this properly, none of the fisheries NFPs identified this activity sets as a current priority. Again, this seems to have been included in the project without proper discussion with the relevant authorities (in this case the national fisheries agencies).
101. In the MTR's view, this Output and its associated indicator should be reviewed to ensure alignment with implementation realities and project priorities.

²¹ A UNEP/MAP reviewer commented that 'These initiatives correspond to [six micro-projects implemented by SPA/RAC in the Adriatic region](#) with support from the Italian Ministry of Environment and Energy Security (MASE) under the UNEP/MAP 2024–2025 Programme of Work. Of these six initiatives, only two received direct support from the FishEBM MED project: Montenegro: "[Strengthening Citizen Science for Shark Conservation in Montenegro](#)", and Albania: "[Voices of the Deep](#)". These initiatives contribute to strengthening local capacities for the identification, monitoring and conservation of vulnerable species, particularly sharks and rays. However, these activities were reported to the PSC meeting only in 2026 after the MTR period. A UNEP/MAP reviewer also noted that "An additional effort was made to provide technical assistance to interested partner countries to improve their capacity for collecting data on incidentally caught vulnerable species. To date, this has included support through the FishEBM MED project to two initiatives in Montenegro and Albania aimed at strengthening local capacities for the identification and conservation of vulnerable species."

Output 3.3: Measures identified to cope with the negative effects of non-indigenous species on commercial fisheries and those of other potential stressors (led by UNEP/MAP and SPA/RAC)

102. The project has developed and disseminated nine ‘measures’ to address NIS - largely a series of suggested/recommended actions - up to the MTR. Dissemination activities include a guidelines document, and various media products on addressing NIS have also been produced including three articles published through IW:Learn and four videos to illustrate some of the proposed measures. SPA/RAC also organized a regional workshop on NIS in January 2025 bringing together scientists, fishers, civil society organizations, national institutions, and private sector actors to exchange experiences and identify solutions for the prevention, eradication, and control of NIS at priority sites in the Mediterranean²². The participants explored scalable approaches and emphasized the importance of regional cooperation and policy integration. A national representative from Tunisia highlighted to the MTR that such workshops provide valuable opportunities for exchange and peer learning across countries. The NIS workshop noted the need to better link fisheries with environmental governance on NIS as an important gap to be addressed. Altogether 16 countries participated, of which 7 were project beneficiary countries. Among others, blue crab and lionfish were discussed, the latter because of interest for high-value markets in Istanbul.
103. The project itself has not undertaken any direct activities to control or reduce NIS species in the Mediterranean (this was not the aim), but the impact of its promotion and dissemination of measures such as the videos presenting Comprehensive Biosecurity & Early Detection, the Market Valorisation & Promotion of NIS Products, and the Adaptive Harvest/Fisheries has not been measured. Blue Crab. The project itself has not undertaken any direct activities to control or reduce NIS species in the Mediterranean (this was not the aim), but the impact of its promotion and dissemination of measures such as the videos presenting Comprehensive Biosecurity & Early Detection, the Market Valorisation & Promotion of NIS Products, and the Adaptive Harvest/Fisheries has not been measured.
104. Although addressed under Component 1 and 4, GFCM hosted a SSF Forum workshop in Akyaka, Türkiye in 2023, bringing together around 50 fishers and stakeholders from 10 Mediterranean countries to enhance stakeholder engagement in NIS management and share market-based solutions to NIS in a blue economy context. The forum aimed to strengthen the capacity of small-scale fishers to manage and capitalize on the increasing presence of NIS in their catches. It provided a platform for experience sharing, peer learning, and discussion on practical solutions related to handling, marketing, and creating value from these species, including linkages to ongoing GFCM pilot studies²³. Feedback from participants from Tunisia highlighted positive outcomes, particularly in terms of knowledge transfer and hands on application. For example, one participant reported using the experience to train women’s groups on fish processing and product valorisation (e.g. blue crab), contributing to new market opportunities and increased awareness among fishers and local businesses. The forum also facilitated exchange of practical techniques (e.g. blue crab trapping methods) and discussions on establishing local processing units. However, again, it is unclear whether there has been any follow up to this workshop – whether any specific new businesses were developed or investments secured (these do not appear to have been monitored and reported on).
105. Other activities under this output addressing ‘other potential stressors on biodiversity and marine ecosystems’ have focused on producing a set of guidelines on reducing and managing solid waste discharge from fishing boats in the Mediterranean region. This was produced by SPA/RAC but had little input from GFCM (only late in the drafting process) or fisheries NFPs²⁴ and it is unclear how the

²² UNEP/MAP-SPA/RAC, 2025. Workshop to discuss and identify the appropriate measures for the reduction of new introductions and for eradication/control of NIS - Outcomes Summary Report

²³ GFCM. 2023. Small Scale Fisheries Forum: Non-indigenous species: from health and safety to marketing opportunities: This SSF Forum workshop was held in Akyaka, Türkiye, from 21 to 23 November 2023

²⁴ A reviewer from UNEP/MAP stated that ‘The guidelines on reducing and managing solid waste discharge from fishing boats in the Mediterranean and its relative desk review on state of waste management practices were developed by SPA/RAC through an internationally

resulting publication will be used. This raises a general point concerning many of the project publications, especially those produced by SPA/RAC and targeted at fisheries sector – that it is unclear how these will be mainstreamed into fisheries management process, especially as their development and production has not been coordinated with GFCM or the fisheries NFPs which have had minimal input into the activity. In addition, a graphic novel to raise awareness activities among fisher communities on how to mitigate ALDFG was produced under this Output which was well-received according to MTR interviewees.

Output 3.4: Training programmes and case studies to strengthen national capacity towards the development of fisheries tenure interventions (referring to gender-responsive training programmes and case studies) (led by GFCM)

106. According to MTR interviewees, fisheries tenure issues and co-management is not a priority under the project and there was ignorance on why this Output had been included in the project. One interviewee with knowledge of the design phase stated that this was included at the request of the GEF Secretariat; in other words, it had no ownership by any of the key national stakeholders. Nevertheless, the project held a regional meeting on fisheries tenure held during GFCM WG on SSF in 2024 at which 18 countries participated: 6 project beneficiary countries (Algeria, Lebanon, Montenegro, Morocco, Tunisia, Türkiye) with 48% female, 52% male representation.

Component 4: Blue economy at the regional and country level promoted through the identification of existing hurdles via a concerted approach among relevant stakeholders – SPA/RAC and GFCM

Finding 2.15: No new fisheries sector investments have been identified and mobilised in context of marine spatial planning through the project. To date only one factsheet on innovative solutions for fishery sector to attract blue economy investments has been produced but a well-received workshop (SSF Forum on NIS: from health and safety to marketing opportunities) was held in Türkiye in 2023 although there does not appear to have been any significant targeted follow up to this meeting.

Finding 2.16: No NAP+ with associated with investment plan tested have been endorsed (or even drafted), and there have been questions over the scope, function and ownership of the NAP+ element of the project with poor understanding and confusion over what is intended among stakeholders (including the term 'NAP+', which dates back to the project design phase). Also, although the '+' represents enhanced fisheries input to National Action Plans (NAP) to deliver on the Strategic Action Programme (SAP) for the Mediterranean, there has been little involvement of GFCM or fisheries NFPs in NAP+ related activities to date (which represents a missed opportunity for collaboration). SPA/RAC has begun preliminary work on the NAP+ in Montenegro, but full NAP+ implementation is judged to be highly unlikely by end 2026, although there is the possibility for the project to contribute to existing Blue Economy planning process plans in Tunisia, Libya, and Morocco.

Finding 2.17: No new partnerships have been implemented through NAP+ as the NAP+ had yet to be developed at the MTR point.

107. Little progress has been achieved on this Component by the MTR point, in part because of delays to UNEP/MAP and SPA/RAC being able to commence their activities related to this Component, the discontinuation of FAO's 'Blue Hope' programme which was to produce investment plans through the

recognized consultant with expertise in the subject matter. The methodology included a regional consultation process through a questionnaire that was shared with both fisheries and environment focal points across Mediterranean countries and stakeholders were encouraged to contribute. While responses were received from 19 stakeholders, only four originated from project beneficiary countries. In addition, draft versions of the guidelines and the associated desk review document were shared with GFCM for review. Comments received from GFCM were incorporated into the final versions prior to validation and publication'. However, MTR interviews contradicted some of these statements in that GFCM was only consulted late in the process (draft of guidelines) and NFPs interviewed did not feel they were significantly involved and ownership of the guidance was consequently low.

project, and due to a lack of clarity over what was intended by the National Action Plans Plus (NAP+) and who should be involved in developing these.

Output 4.1: Analysis carried out on how the fishery sector can mobilize investments, including in diversification of livelihoods (e.g. aquaculture planning, pescatourism), against the background of marine spatial planning (led by GFCM)

108. The key activity under this Output is to ‘collect and review (desk based) of information on previous and ongoing work to frame the fishery sector in the blue economy, including in the context of marine spatial planning in the Mediterranean Sea, based on consultation with regional stakeholders and experts’. This had not been done by the MTR but a ‘methodology for collecting information about good practices and disseminating the information via a standardized approach’ has been prepared. According to MTR interviewees there will be an effort to address this Output at latter stages of the project when project results are almost complete, when an analysis of what investments are needed/where/how much/and by whom will be needed (useful for any follow project).

109. The indicator for achievement of this Output is ‘Number of mobilized investments identified in context of marine spatial planning’ and the end-of-project target is 2 investments mobilised. Apart from the fact that this indicator is not a direct indicator for the Output (which only relates to the analysis of how investments can be mobilised), it is unlikely that any specific new investment will be mobilized by the end of the project. None had been identified and mobilized in the context of marine spatial planning by the project by the MTR point. Instead, MTR interviewees stated that the project has focused on liaison with partners and stakeholders to mobilize additional co-financing support (although see section below on co-financing).

Output 4.2 Factsheets on successful innovative solutions for the fishery sector and sustainable use of marine ecosystem services prepared in view of attracting blue economy related investments (led by GFCM)

110. The factsheets were to be developed based on the results of the analyses undertaken in Output 4.1, but given Output 4.1 has not yet been delivered, delivery of this Output has been limited. To date only one ‘factsheet’ has been developed which focused on market-based solutions to NIS in a Blue Economy context and was produced in association with the GFCM-organised SSF Forum on NIS: from health and safety to marketing opportunities, in Türkiye in November 2023. Feedback from participants at this event to the MTR indicated it was useful, but it had limited follow-up and there appears to have been no support to developing ‘market opportunities’ as

Output 4.3 Endorsed pilot NAP+ with investment plan(s) tested in at least one country (led by UNEP/MAP and SPA/RAC)

111. No country has yet endorsed (or even developed a draft) NAP+ and investment plan. There is considerable confusion over this Output.

112. Also, the regional guidelines document for the preparation of a NAP+ has not yet been developed and indeed can only be developed after the NAP+ (in whatever form) has been developed, as no NAP+ exists for there is no experience to draw on to capture in ‘guidelines’).

113. Up to the MTR point, the focus had been on developing a NAP+ for Montenegro (Montenegro was targeted as it had allocated some GEF Biodiversity Focal Area funding to the project budget, other countries had not). An online meeting to present a concept on the NAP+ was held with Montenegrin Focal Points (Environment and fisheries) in November 2024. However, MTR interviews revealed confusion with other ‘action plans’ (e.g. confusion with the National Biodiversity Strategy and Action Plan and climate change adaptation plans). In the MTR’s view, it appeared that the authorities in Montenegro had little

understanding of what the NAP+ was, its scope, or process and requirements for development, so it appears that national ownership was low. The Environment Ministry apparently did not have the resources to lead on this themselves so agreed for SPA/RAC to employ a consultant (using the GEF funds) to take charge (based in the Ministry) and the team of national 'experts' has been contracted, along with some 'regional experts'. Nevertheless, the environment ministry officials themselves had had little interaction in the process up to the MTR, and the fisheries agency even less.

114. A NAP+ Concept Note was developed by SPA/RAC in autumn 2025 (no date) but this was not discussed with GFCM who only became aware of it several months later. A first national consultation in Montenegro to engage with stakeholders and agree on the scope of the NAP+ and what can be achieved before the end of the project was scheduled for February 2026.
115. A key problem with this Output, apart from the late start due to delays with SPA/RAC being able to begin project activities (see below), has been that there has been no consensus on what the NAP+ is intended to be or who should be involved. The description in the PIF or the Project Document is very confusing and the explanatory text in English difficult to understand and interpret.
116. National Action Plans (NAPs) were required to be developed for each country in the Mediterranean based on the key recommendations of the Strategic Action Programme (SAP). The plus suffix of NAP+ is intended to indicate an extra dimension specifically reinforcing the economic, social and environmental importance of fisheries in the region²⁵. In other words, a NAP+ would build on existing NAPs (update and strengthen them) with a specific focus on fisheries. However, according to MTR interviews, it was not clear how many of the 9 participating countries have developed a NAP or what their present status is in each country, so they would need to be developed from scratch. In addition, there seems to have been minimal discussion with the fisheries sector during the design phase.
117. Confusingly, the Project Document indicates that a NAP+ is geared more to providing a specific contribution to national Blue Economy Strategies, which is reflected in the title of Component 4 (*Innovative blue economy solutions accounting for the fishery sector*). For instance, the Project Document states that the NAP+ will provide an '*enhanced contribution by sustainable and profitable fisheries at the regional level to a national blue economy strategy*' involving '*data collection and studies on the blue economy sectors potentialities and possible constraints, in Montenegro*'. Consequently, it seems that a NAP+ and a national Blue Economy strategy are quite distinct but a NAP+ contributes to a Blue Economy strategy or plan. Indeed, the 'Blue Economy' involves a wide range of sectors beyond those traditionally addressed by NAPs such as tourism, transport, tourism, agriculture, urban development, land use planning, and financial and economic investment, and it is difficult so see how the FishEBM Med project (with SPA/RAC leading) could properly engage with all these sectors to produce a meaningful NAP+ that is equivalent to a Blue Economy Strategy. In addition, the development of Blue Economy policies, strategies and plans are usually the remit of other ministries such as the Ministry of Economy or Transport, rather than Environment. Consequently, there is a lack of clarity over the relationship between the previous NAPs, NAP+ and national Blue Economy Strategies/Plans, who has responsibility for developing each of these, what the process is for developing each in each country is (not documented), and even the status of NAPs and BE Strategies/Plans in each target country or national processes for these is unclear (not detailed in Project Document and not clear to MTR interviewees).
118. It should be reiterated that there are significant differences between the two approaches – a NAP+ requires a significant involvement of the fisheries sector (which is not the remit of UNEP/MAP and SPA/RAC) while Blue Economy strategies and plans require involvement of multiple sectors and are

²⁵ The Project Document states that 'through the collaboration (with) GFCM-MAP to ensure that favorable conditions are created towards integrating fisheries into existing National Action Plans.'

usually led by a non-environment ministry. It is unclear whether UNEP/MAP and SPA/RAC have the leverage with these other sectors.

119. Libya, Morocco and Tunisia have expressed an interest in addressing some of the key issues within their existing and ongoing processes to develop their own blue economy strategies and plans (they do not use the term 'NAP+' and have a clear focus on blue economy), which the MTR believes represents an important opportunity to mainstream key messages and guidance on management and investment for sustainable fisheries into existing initiatives (offering 'low hanging fruit') and something to which SPA/RAC with support of the fisheries stakeholders (GFCM and fisheries NFPs and agencies) could make a valuable contribution before the end of the project. In Tunisia for example, an analysis of development opportunities for the blue economy and initial workshops have been undertaken, and work on the stakeholder platform and mapping of the sector's stakeholders to move forward has begun, so there is already interest and momentum to build on. Also, helpfully, UNEP/MAP has already prepared a strategy for sustainability development in the Mediterranean (2025-2026) that includes blue economy which could inform this exercise.
120. Given the confusion over the scope and intention of the NAP outline above, poor involvement of the fisheries or other sectors, it is highly unlikely that even a 'NAP+' for Montenegro can be developed with an investment plan developed and capitalised, endorsed by the Government of Montenegro, and under implementation by the end of December 2026 (even with a No Cost Extension). Consequently, in the MTR's view this Output needs to be reviewed and an alternative proposal put forward by UNEP/MAP and SPA/RAC that is realistic and can be delivered by the end of 2026, including relevant indicators, targets and milestones. The new proposal should be endorsed by the PSC members.
121. It should also be noted that neither SPA/RAC nor GFCM has significant experience with blue economy and the development of blue economy related planning processes which in the MTR's view presented a handicap. SPA/RAC has recently sought to remedy this by employing a new member on the team with more background in this area. UNEP/MAP, UNEP (NBO) and FAO all have greater capacity in this area and should perhaps have provided greater support (and sooner).

Output 4.4 New partnerships implemented through the NAP+, enabling the participation of the private sector in blue economy (led by UNEP/MAP and SPA/RAC)

122. No new governance partnerships have been established as no NAP+ has yet to be developed and there has been no increase in private sector engagement in the blue economy through the project activities.

Component 5: Knowledge management and outscaling

Finding 2.18: Only one national FishEBM Med/Post-2020 SAPBIO stakeholder platform has been established (for Tunisia).

Finding 2.19: An outline Knowledge Management and Communication (KMC) strategy for the overall project (covering GFCM, UNEP/MAP and SPA/RAC KMC activities) was developed at the project design stage (presented in the Project Document). However, it remains too generic and insufficiently tailored to the FishEBM Mediterranean project. GFCM and SPA/RAC further developed their KMC plans independently once project began but again these were not sufficiently detailed.

Finding 2.20: Materials to communicate project activities and results have been shared at national, regional, and global fora through various channels, including on social media, the GFCM, SPA/RAC and FAO websites, and IW:Learn, although the MedProgramme knowledge sharing platform has not been utilized. However, the project's identity and visibility remain weak, with frequent confusion between the FishEBM Med project and the MedSea4Fish programme over the GFCM elements of the project and very little awareness and understanding of the project among the environmental NFPs on the UNEP/MAP and SPA/RAC project

elements. The absence of a clear and consistent project narrative has limited the effectiveness of communicating project aims, messages and results.

Finding 2.21: The project (both GFCM and SPA/RAC) has produced some good knowledge products, including guidelines and experience notes. However, these remain limited in scope and number, and their uptake, dissemination and use have not been systematically monitored or documented, making their impact difficult to assess, and no structured guidance provided to national focal points on how to communicate project results.

Finding 2.22: Collaboration and coordination between GFCM, SPA/RAC and UNEP/MAP on the KMC elements of the FishEBM Med project has been weak, inconsistent and largely ad hoc, with KMC functions operating largely independently (in silos).

Output 5.1: Initiatives promoted to support countries in encouraging strategic investment enabling, among others, public and private partnerships (led by UNEP/MAP and SPA/RAC)

(i) Establishment of national stakeholder platforms

123. The project proposed the establishment of national FishEBM Med/Post-2020 SAPBIO stakeholder platforms in interested countries, led by UNEP/MAP and SPA/RAC, which were to include public and private actors involved in the conservation and sustainable management of marine resources and ecosystems. These platforms are intended to support the integration of activities on fisheries and activities on biodiversity protection and to be the basis for developing the NAP+s, develop national blue economy capacities, encourage participation in FishEBM Med actions, and promote joint investments. However, only one platform had been established at mid-term point (during a MedProgramme Outreach Meeting in Tunis in September 2025) and their intended role in strengthening stakeholder engagement remains unrealized.

124. MTR interviews indicated that UNEP/MAP had encouraged the establishment of these stakeholder platforms at an early stage and prior to the implementation of project activities (building on previous MedProgramme work), but there have been substantial delays to the UNEP/MAP and SPA/RAC project activities (see below) including to efforts to set up these platforms. As a result, stakeholder engagement has been constrained (at least in relation to the project's marine environment aims and activities, less so for the fisheries elements led by GFCM). As noted by a key informant, "until we establish the national platform, it will be difficult to assess whether the project is successful in fostering collaboration among stakeholders", highlighting the critical importance of this Output in the project design.

Output 5.2: Lessons learnt and best practices disseminated to showcase the benefits of the concerted GFCM-MAP approach aligning different national and regional priorities (led by GFCM, UNEP/MAP and SPA/RAC)

(i) Knowledge management and communication at GFCM and SPA/RAC level

125. The project has produced some valuable knowledge products intended to support fisheries management and raise awareness of conservation of marine biodiversity and ecosystems in the Mediterranean. Example publications developed by GFCM include the 'Acoustic footprint of bottom trawling in the Adriatic Sea' study and the 'Guardians of the Sea' graphic novel, and by SPA/RAC the 'Guidelines Document on the Identification and Introduction of Appropriate Measures for the Reduction of New Introductions and for Eradication/Control of NIS in Priority Sites in Line with Post 2020 SAPBIO'. However, the number and scope of knowledge products produced to date remain relatively limited and the project has not systematically monitored or documented how these products are

disseminated, used, or perceived by target audiences. As a result, their practical usefulness and impact remain difficult to assess.

126. GFCM and SPA/RAC have also both made efforts to strengthen the promotion and visibility of project messages and results through dedicated social media accounts on LinkedIn, Facebook, and X using the FishEBM hashtag, GFCM FishEBM Med project webpage, and the SPA/RAC and FAO websites. Examples include informative social media posts on ‘*Fight against IUU fishing in the Mediterranean*’, ‘*Survey at sea in Lebanon*’, ‘*VMS pilot in Montenegro*’, on ‘*NIS story*’ (by GFCM) and webnews on ‘*Strengthening Citizen Science for Shark Conservation in Montenegro*’ and ‘*Voices from the Deep: Protecting Sharks and Rays in Vlora Bay*’ (by SPA/RAC). Interestingly, SPA/RAC (unlike GFCM) has heavily used influencers, particularly those with a strong reputation in the sector. For example, one communication reel featured Sara El Mabrouk, a leader in citizen science initiatives for documenting marine biodiversity and raising awareness on conservation in Libya. As a key interviewee noted, this approach has helped amplify messages and encouraged wider engagement (particularly with younger audiences).
127. However, communication materials specifically dedicated to explaining the objective, expected results, participants and other details of the project at the start of the project were limited, with no standalone briefing notes or comprehensive project overview documents produced by GFCM and SPA/RAC beyond a brief description available on their webpages. Unfortunately, this has contributed to a mixed understanding of, and confusion over, the overall project aims and narrative among stakeholders. For instance, when asked to state their understanding of the project’s objective in one sentence, MTR interviewees provided a wide range of responses (each one different!). These included: “integrating biodiversity considerations into fisheries management in international waters”; “demonstrating the added value of collaboration between fisheries and environmental sectors at both regional and national levels”; and “preserving marine ecosystems and the communities that depend on them”. Whilst the project does touch on all of these, none are the actual stated objective of the project (To reverse the overexploitation of select commercial living marine resources of Mediterranean countries in support of their blue economy development pathway). As noted by a key informant, “it is very difficult to explain the project to countries and at the local level, including how it addresses key issues. It is difficult to ‘land’ it and communicate about it effectively”.
128. The diversity of responses indicates that the project’s objectives and narrative have not been consistently communicated across stakeholders. This suggests that insufficient attention was paid to basic messaging and it clearly presented a challenge for the project teams (both GFCM and SPA/RAC as well as UNEP/MAP which was supposed to provide guidance and oversight on KMC to SPA/RAC). However, it needs to be recognised that the complex, poor design of the project with multiple elements that connect only weakly (see below) does not help efforts to try and communicate a coherent project vision – it makes KMC much more difficult.

(ii) Engagement with IW:Learn

129. The project (through both GFCM and SPA/RAC) have engaged with and contributed to the IW:Learn platform, through their engagement remains limited. Published content on the project includes articles such as *Empowering women and girls for a sustainable future*, *Tackling invasive species through innovation and community*, *NIS expansion: Challenges and opportunities*, *the FishEBM approach: bridging conservation and coastal livelihoods*, and *FishEBM projects contribution to SOMFI 2025*. However, contributions have largely been undertaken independently, with no joint work.

(iii) Weak KMC coordination between GFCM and SPA/RAC

130. Some coordination on communication activities and products has taken place between GFCM and SPA/RAC, including efforts to ensure consistent messaging and the cross-sharing of KMC products posted on social media. However, this has been inconsistent and joint KMC efforts remain limited, with most communication activities carried out separately with few jointly organized events. In addition, GFCM, SPA/RAC and UNEP/MAP do not have a common shared database to store and access all KMC products: each maintains its own database and publishes knowledge and communication products on their own platforms.
131. Overall, collaboration and coordination on KMC between GFCM, SPA/RAC, and UNEP/MAP have remained largely ad hoc, with KMC functions operating in silos.

(iv) Project identity and visibility

132. Interviews and a review of KMC products revealed poor project identity and visibility among both fisheries and marine environment sector stakeholders involved in the project. Interviews with national stakeholders indicated confusion between the MedSea4Fish programme and the FishEBM Med project, with difficulties in clearly distinguishing between the two when discussing aims and results. This is also reflected in publications. For instance, some FishEBM Med project knowledge products prominently display the MedSea4Fish branding with limited or no reference to the FishEBM Mediterranean project. As one MTR interviewee noted “the project is largely overshadowed by other GFCM activities and project communication tends to focus on GFCM as a whole, with limited reference to FishEBM”.
133. A similar situation was observed with UNEP/MAP and SPA/RAC, although the challenges relate more to limited awareness of the project rather than confusion with other initiatives. While in some countries such as Algeria the project is relatively well understood, in others awareness remains low. For instance, in Montenegro, stakeholders expressed confusion regarding the project’s scope and activities related to its environmental activities, and in Albania the environmental NFP knew very little and had low awareness of the project. Similarly, in Lebanon and Libya interviewees indicated very limited awareness of the project’s objectives and activities but this is perhaps unsurprising given that neither country has not yet been involved in any significant project activities.

(v) Knowledge management and communication at country level

134. Communication and dissemination of project results at the national level have been uneven across countries. While some initial efforts were made, such as invitations by NFPs to meetings organized by the implementing and executing agencies to promote and involve them in the project, these have not translated into consistent or structured national-level communication. Interviews indicated limited visibility of the project at country level. In Tunisia and Morocco, for instance, no specific activities related to communicate about the project were reported at national level. In Lebanon, although some communication efforts were undertaken, these were not a priority due to the country context and ongoing instability, resulting in limited outreach to a wider national audience. In contrast, Türkiye has demonstrated more proactive communication efforts with support from GFCM, including coverage of the project in national newspapers (e.g., an article on the *FishEBM approach: bridging conservation and coastal livelihoods*), these differences indicate an *ad hoc* approach to national-level communication, with limited strategic guidance and support to ensure consistent dissemination of project results across countries.
135. Stakeholders interviewed emphasized the need for greater support from the project’s executing partners to support KMC activities at national and local levels (several stressed the importance of communicating about the project with fishing communities and other local actors). At mid-term, there is no indication that the project has provided any specific training or guidance to NFPs and their

institutions on how to communicate project results effectively within government or to wider stakeholder groups. Steps are being taken by GFCM to strengthen communication capacity, such as the development of a communications toolkit, but it is unclear what plans UNEP/MAP and SPA/RAC have developed to address this.

(vi) Exchanges with the FishEBM Black Sea Project

136. Interactions between the FishEBM Mediterranean and FishEBM Black Sea projects have been relatively limited, which is surprising given that the TPM/PC, PMU, and FAO LTO are shared between the projects. There have been few direct exchanges and joint learning activities on common outputs or thematic areas that are common to both initiatives (particularly related to Components 1 and 2). In the MTR's view opportunities for knowledge exchange and mutual learning should be explored much more.

Output 5.3: Outreach & Communication Strategy developed and implemented, including coordination and awareness-raising meetings with co-financing partners and participation in relevant global GEF related for a (led by GFCM, UNEP/MAP and SPA/RAC)

(i) Knowledge Management and Communication Strategy

137. The GFCM team developed a KMC strategy intended to guide the generation, dissemination, and uptake of knowledge for the overall project. The strategy provides a framework aligned with GEF IW guidance and frames KMC as a cross-cutting function supporting project implementation. The document also identifies generic target audiences (public authorities, scientific community, NGOs, private sector and the public) and proposes appropriate dissemination channels such as IW:Learn newsletter, the GFCM and FAO websites and UNEP/MAP MedProgramme platform. During its development, the UNEP/MAP MedProgramme KMC strategy was shared with GFCM to facilitate alignment²⁶, although, according to interviewees, SPA/RAC staff were not involved in the development of this strategy, as UNEP/MAP and SPA/RAC were not yet properly engaged in the project at that point (due to delays over project cooperation agreements and the transfer of GEF funding – see below).

138. However, the project's KMC strategy developed by GFCM was still largely conceptual and lacks sufficient operational detail to effectively guide implementation. For instance, it does not include clearly defined roles and responsibilities, resource allocation, or monitoring activities or clearly specify which knowledge products are intended for which users and for what purpose, and dissemination has not always been tailored to different stakeholder groups or country contexts. The strategy also lacks mechanisms to monitor the uptake and use of knowledge products beyond their production and dissemination. Finally, the strategy is not clearly linked to the stakeholder engagement plan and does not adequately integrate gender considerations into communication approaches.

139. Importantly, the KMC strategy lacks a time-bound and action plan to be delivered jointly by GFCM, SPA/RAC and UNEP/MAP that sets out shared activities and a coordination structure for how the three organisations would collaborate to ensure consistent messaging and KMC activities. As a result, KMC activities led by GFCM and those led by SPA/RAC and UNEP/MAP have been implemented largely independent of each other and there is a lack of a combined coherent effort on project KMC.

(ii) Project positioning

140. The project's positioning and identity within the GFCM portfolio remains unclear, contributing to confusion among stakeholders. Interviews indicated confusion with the MedSea4Fish 'programme',

²⁶ FishEBM Mediterranean KMC strategy mentions integration and dissemination of expected project's results within UNEP/MAP KMC strategy.

which is an overarching framework rather than a distinct programme or project, which has diluted the visibility and identity of the FishEBM Med project.

141. As mentioned above, limited effort has been devoted by GFCM, SPA/RAC and UNEP/MAP to developing clear, stakeholder-specific messaging and linking communication efforts to the stakeholder engagement plan. This contributed to an initial lack of shared understanding of the project's objectives among stakeholders, including NFPs, and the visibility of the project.

(iii) Use of the UNEP/MAP MedProgramme platform

142. At design stage, it was intended that the UNEP/MAP's MedProgramme knowledge-sharing platform would serve as a central tool for the communication, dissemination and outscaling of project results, including a portal to showcase progress and results, a database for storing project data, and visualization tools to support analysis and dissemination. In practice, however, the platform has not been utilized. Although it includes references to the FishEBM Mediterranean project, it does not provide comprehensive or up-to-date information on results from SPA/RAC and GFCM activities.

143. There have been delays over the use of the platform by the project with only five information and communication items on the project available through the platform up to MTR point, and the platform was reportedly on hold until mid-2025, which further constrained its use during a significant part of project implementation. Although it includes references to the FishEBM Mediterranean project, it does not provide comprehensive or up-to-date information on results from SPA/RAC and GFCM activities. (The PPR 2025 provides a list of communication items supposedly available in the MedProgramme knowledge management platform. However, these are published in UNEP or IW:learn websites). As a result, opportunities to centralize information, enhance visibility of project achievements, and facilitate knowledge sharing across stakeholders have not been realized.

(iv) Participation in global and regional knowledge-sharing platforms

144. To disseminate project results, the project team (both GFCM and SPA/RAC) have participated in several regional and global knowledge-sharing events during the reporting period. Among other events, the GFCM project team has participated in the Meeting of the Ecosystem Approach Correspondence Group on Monitoring (CORMON) Biodiversity and Fisheries (April 2025), the launch of the 2025 edition of SoMFi (November 2025) and the 10th GEF International Waters Conference (IWC10, September 2024), and SPA/RAC has participated in the National MedProgramme Outreach Workshop (2025), the 17th Meeting of the SPA/Biological Diversity Focal Points (2025), and the Third MedProgramme Annual Stocktaking Meeting (2025). These events provided opportunities to showcase the FishEBM Med project results, experiences and lessons learned, to enhance project visibility, capitalize on experiences, and inform future actions, as well as contributing to broader discussions on ecosystem-based fisheries management and sustainable use of marine resources. They also brought together and helped inform country representatives and observers to discuss future biodiversity conservation efforts in the Mediterranean. In addition, SPA RAC organized a workshop bringing together a diverse range of stakeholders, including scientists, managers, institutional representatives, and field actors (fishers and entrepreneurs). The workshop featured a presentation on how blue crab shells are being processed to produce a material that can serve as a plastic substitute, which triggered discussions among the different stakeholder groups and some countries are trying to replicate this experience.

145. In addition, both GFCM and SPA/RAC teams have presented results at the same events including the Large Marine Ecosystems Consultation Meeting (2023, 2024, 2025), the annual sessions of the GFCM (2023, 2024, 2025) and the Project Steering Committees providing opportunities for exchange.

146. The IW:Learn platform has to date provided the main channel for out-scaling key project messages and results and both GFCM and SPA/RAC have engaged. For example, GFCM participated in a knowledge sharing event such as the UN Ocean Conference in June 2025 sharing the FishEBM experience in advancing innovative approaches to sustainable ecosystem-based fisheries management in the Mediterranean and Black Sea; and both GFCM and SPA/RAC participated in a workshop on communication approaches such as storytelling where SPA/RAC presented a story on blue crabs in Tunisia, showing how fishers are turning the threat of an invasive species into a sustainable fishery. According to interviews, these interactions facilitated exchanges with other IW projects and organizations, allowing the project to showcase its achievements and learn from experiences across the GEF portfolio. An example is contacts established through these events which led to the presentation of GFCM work on underwater noise from trawl vessels in the Adriatic Sea to the International Maritime Organization (IMO) who expressed interest. However, while participation in such events has supported external visibility and learning within the IW community, evidence of how these exchanges have been systematically captured and translated into project learning or improvements in management of fisheries and the marine environment, opportunities to consolidate lessons learned and facilitate knowledge sharing across countries, the wider region and beyond remain limited.
147. It should also be noted that there has been limited exchange and coordination with the FishEBM Black Sea project, despite similarities in approach and potential synergies, which has limited opportunities for learning and joint communication.

4.2 Degree of attainment of the project objectives and likelihood of longer-term impacts

Finding 2.23: The poorly formulated project objective and outcome statements and associated indicators (not SMART) make assessment of project changes and impacts problematic.

Finding 2.24: The current target for the first indicator – *Marine Protected Areas created or under improved management for conservation and sustainable use* – has been wrongly reported on as UNEP/MAP and SPA/RAC do not have any project activities seeking to improve management in MPAs (this seems to have been based on a ‘misunderstanding’ of where the project would focus, made during the early design phase but was not noticed until the MTR). Nevertheless, the end-of-project target (125,845 ha) has been exceeded (593,618 ha) by considering the project’s contribution to establishment of an FRA in the Otranto Channel.

Finding 2.25: The mid-term target (100,000 tonnes) for the second indicator - *Globally over-exploited marine fisheries moved to more sustainable levels (metric tons)* – has been achieved (142,180 tonnes of landings from fisheries under sustainable management) but the end-of-project target (238,000 tonnes) is also considered too ambitious given the natural fluctuations in fish stocks and should be recalculated.

Finding 2.26: According to the 2025 PPR report, the mid-term target for the third project objective – 8 x countries with gender disaggregated fisheries-dependent employment data (only vessel-based employment) as reported in the SoMFi 2025 – has been reached but the extent to which the FishEBM project activities actually contributed to these figures is unclear.

(i) Progress meeting the project objective and GEF Core Indicator targets

148. The project objective is to ‘reverse the overexploitation of select commercial living marine resources of Mediterranean countries in support of their blue economy development pathway’. However, it is difficult to assess the degree to which this has been achieved because the project has a set of poorly formulated outcome statements and associated indicators (not SMART – see project design and M&E sections below). In addition, it should be also noted that the objective as stated is difficult to assess

and achievement is beyond project's ability to deliver as the project cannot '*reverse the overexploitation of select commercial living marine resources*' on its own but only as part of a much greater effort involving many other initiatives targeting sustainable fisheries, and dependent on external circumstances (e.g. climate change effects).

149. The Results Framework in the Project Document gives three indicators with associated targets for demonstrating progress on reaching the project objective, two of which represent GEF Core Indicators. These are:

- i. Number of hectares of marine protected areas, fisheries restricted areas and/or other effective area-based conservation measures (OECMs) created or under improved management for conservation and sustainable use;
- ii. Landings from fisheries under sustainable management; and
- iii. Number of countries having complete data on fisheries-dependent employment, disaggregated by gender, along the value chain.

150. The first indicator target for the mid-term point, which corresponds to GEF Core Indicator 2 - *Marine protected areas created or under improved management for conservation and sustainable use (Hectares)* - has been met. However, not in the manner expected. According to interviewees, initially, at the PIF stage, it was proposed that the FishEBM Med project would have a suite of activities within MPAs in the target countries, which would be led by UNEP/MAP and SPA/RAC²⁷. However, there have been no specific activities under the project targeted at improving management effectiveness within MPAs (and no new MPAs were expected to be created through the project) and this has been wrongly reported on by UNEP/MAP and SPA/RAC in successive project reports (e.g. PIRs). The initial proposal to undertake specific project activities in target MPAs appears to have been abandoned during the later design but does not seem to have been communicated effectively across all parties. Instead, there seems to have been an understanding (or misunderstanding) that this Core Indicator would be addressed through project activities related to establishing Fisheries Restricted Areas (FRAs). This does not seem to have been noticed until the MTR. The PIR for 2025 reported a total of 593,618 ha for this target but that was based on information provided by SPA/RAC and UNEP/MAP which presumably considered MPAs, which as noted above have not received project activities, so the 2025 PIR figure is considered incorrect. However, even though the project has not directly targeted activities within MPAs, the project's end-of-project target (125,845 ha) has been exceeded by considering the project's contribution to establishment of an FRA in the Otranto Channel (270,200 ha – see Box 2 below).

Box 2: The Otranto Channel Fisheries Restricted Area (FRA)

In November 2024 the GFCM adopted [a Recommendation](#) establishing a FRA in the Otranto Channel (Southern Adriatic Sea, GSA 18), which covers 270,200 hectares – one of the largest FRAs in the Mediterranean. The Recommendation entered into force in April 2025 and so the FRA is now active. The adoption of this FRA is a direct result of FishEBM MED activities, namely: the ROV survey to study the bamboo coral forests (*Isidella elongata*) which form a vulnerable marine ecosystem to be protected, which are essential fish habitats (nurseries and spawning grounds) for deep- water red shrimp, European hake and Norway lobster; a socioeconomic study

²⁷ The Project Document notes that 'The 125,845 hectares were calculated at the PIF stage on the basis of the percentage (%) of the nationally designated MPAs for the whole Mediterranean Sea. This is reported to be 1.31 % (3,297,200 Hectares) (source: MedPAN and SPA/RAC, 2019). Of these 3,297,200 Hectares, 90.05 % is located in European waters (not eligible for GEF). The GEF Mediterranean eligible countries cover roughly 10% of the total Mediterranean surface under designation (i.e. 0.13 %) of the whole Mediterranean Sea. During the project preparation phase, it was decided that FishEBM Med will aim at least to target 38% of the nationally designated MPAs for GEF Eligible countries. This was estimated at: 3,297,200 Hectares * 0.1 = 329,720 * 0.38 = 125,845 hectares expected at PIF stage. Following further elaborations on the basis of more precise data on the MPAs that may benefit from FishEBM Med, of the endorsement by GEF eligible Mediterranean countries of the project proposal and of their preliminary manifestation of interest on specific MPAs, we are confirming the CI2 target 125,845 hectares and providing a list of targeted MPAs in the GEF 7 Core Indicators Worksheet. The project will anyway take any possible action to increase this target if feasible'. A total of 20 MPAs were included in the calculation (within 14 protected areas: Butrinti (Albania), Karaburun-Sazan (Albania), Cap Lindles (Algeria), Habibas Islands (Algeria), Farwa lagoon (Libya), Ain Al Ghazala (Libya), Palm Islands Nature Reserve (Lebanon), Al-Hoceima National Park (Morocco), Kotorsko, Risanski Zaliv (Montenegro), Platamuni (Montenegro), La Galite Archipelago (Tunisia), Îles, Kneiss (Tunisia), Fethiye-Gocek (Turkey), and Foça (Turkey)).

to assess the impacts of the potential closure; a stakeholder consultation meeting to review the outcomes of scientific and socioeconomic studies.

151. Progress on meeting the targets for the second indicator, which corresponds to GEF Indicator 8: *Globally over-exploited marine fisheries moved to more sustainable levels (metric tons)* – is more problematic. The indicator target was calculated on the basis that the tonnage indicated is the tonnage of landings from stocks that are relevant to project beneficiary countries and under a management plan, in sustainable exploitation and biomass around target reference point, or possibly sustainably exploited.

152. Interviews with GFCM personnel revealed that the Core Indicator table in the Project Document was also filled incorrectly at the design phase, based on a misunderstanding over the values entered in the Core Indicator worksheet table (Annex F of Project Document). The value indicated (238,000 tonnes) is the expected target value at the end of the project, not the value (baseline) at the time of project adoption (CEO Endorsement and given in the Project Document). This misunderstanding can be clearly seen in the project's Results Framework in the Project Document where the objective-level indicator is given as follows:

Indicator	Baseline	Mid-term milestone	Final Target
Landings from fisheries under sustainable management	27 000 tonnes of landings from fisheries under sustainable management	100 000 tonnes of landings from fisheries under sustainable management or currently sustainable.	238,000 tonnes of landings from fisheries under sustainable management or currently sustainable.

153. The target value (238,000 tonnes) was calculated based on the landings from species for which advances in terms of management plans or implementation of management measures were expected over the course of the project and stemming from project activities. The status of progress in meeting the original Core Indicator target at the MTR in Table 1 below:

Fishery Details	Globally over-exploited fisheries moved to more sustainable levels (metric tons)					
	PIF stage (2021)	Endorsement (2022)	PPR (Dec 2023)	PIR (Jun 2024)	MTR (PIR Jun 2025)	TE (expected)
<i>Sardina pilchardus</i>			50,537	43,731	33,533	145,000
<i>Engraulis encrasicolus</i>			28,665	38,967	54,691	45,000
<i>Merluccius merluccius</i>	7,922	7,922	6,903	8,136	14,763	23,000
<i>Parapenaeus longirostris</i>	12,658	12,658	11,598	11,617	16,625	8,000
<i>Solea solea</i>	1,282	1,282	1,583	1,422	1,548	5,000
<i>Mullus barbatus</i>	4,632	4,632	3,378	5,578	8,058	4,000
<i>Nephrops norvegicus</i>	648	648	436	858	723	4,000
<i>Squilla mantis</i>					2,713	2,000
<i>Aristeus antennatus</i>			914		561	1,600
<i>Aristaeomorpha foliacea</i>				1,367	2,701	200
<i>Pagellus bogaraveo</i>			122	70	58	100
<i>Coryphaena hippurus</i>				2,692	1,531	
<i>Corallium rubrum</i>					4	
<i>Eledone cirrhosa</i>					763	
<i>Mullus surmuletus</i>					861	
<i>Octopus vulgaris</i>					24	
<i>Raja clavata</i>					36	
<i>Sardinella aurita</i>					2,985	
<i>Saurida lessepsianus</i>					1	
TOTAL	27,142	27,142	104,136	114,439	142,180	237,900

Table 1: Globally over-exploited fisheries moved to more sustainable levels (metric tons) by date

154. Discussions with key project technical staff at both GFCM and FAO NFI indicated that the GEF Core Indicator 8 as stated is not a good indicator for the following reason:

- An indicator that reflects an increase in tonnes of landings “under a management plan, in sustainable exploitation and biomass around target reference point, or possibly sustainably exploited” may not be an optimal indicator because management actions included in management plans and sustainable exploitation will, in most cases (but not all), result in a decrease in the number of tonnes fished. This means that this indicator may increase, decrease or stay the same over the years, irrespective of the positive impacts of the project on fisheries management. The quality of change is as important as the quantitative change, whose direction of change can be irrelevant.²⁸ Consequently, in the MTR’s opinion, the original end-of-project target for the first indicator – 238,000 tonnes of landings from fisheries under sustainable management – was set too high and should be recalculated.

155. While the project may not reach the target value for the current indicator based on landings, the MTR believes that the project has made considerable progress in line with its overarching project objective (*‘To reverse the over-exploitation of select commercial living marine resources by enhancing the capacity of Mediterranean countries to manage fisheries, including through the application of ecosystem-based management tools, in their blue economy development pathway’*). This is supported by the fact that the 2025 edition of SOMFI reported overexploitation levels of 52 percent (i.e. 52 percent of assessed stocks was overexploited or in overexploitation), marking a 6 percent decrease from the 2023 edition, when the overexploitation levels were 58 percent. The advances made are expected to continue along this trajectory through to project-end, demonstrated by the consistent improvement in overall stock status from the 2016 edition of SOMFI when the overexploitation levels were 85 percent.

156. The third indicator for the project objective is the *‘Number of countries having complete data on fisheries-dependent employment, disaggregated by gender, along the value chain’*. According to the 2025 PPR, the project has met both the mid-term and end of project target for this indicator, reporting that 8 countries have estimates of gender-disaggregated fisheries-dependent employment data along the value chain, and that this is reported in the SoMFI 2025. However, the extent to which the FishEBM Med project has contributed to this achievement is not detailed- so whether all the data for the 9 project countries came from the project or was a mixture with other sources. The PPR 2025 also reports that ‘further data collection is underway in the context of relevant socioeconomic surveys being implemented through the project’ which suggests that the project’s collection of socioeconomic data under Component 1 has been only a partial source. It should be noted that this indicator is not directly linked to the project’s objective but is more appropriate to the Outcome 1 which addresses socio-economic data and value chains – indeed is more at output level and should be removed or added as an indicator to Outcome 1.

(ii) Other non-measurable benefits from the project

157. Interviewees also reported several other less-tangible benefits gained from the project, project results that are not measured and captured specifically in the project’s Results Framework, but which nevertheless represent important results delivered by the project and contribute to creating the

²⁸ Other more adequate (SMARTer) indicators could be: (i) the number of relevant Mediterranean priority stocks whose stock status has improved over the course of the project; (ii) the number of relevant Mediterranean priority stocks that transitioned in sustainable exploitation/sustainably exploited or possibly in sustainable exploitation/sustainably exploited; and (iii) overexploitation levels as reported in the GFCM flagship publication ‘The State of Mediterranean and Black Sea Fisheries (SoMFI): an overall percentage that takes into account all stocks assessed in the Mediterranean and the Black Sea and is a reflection of general improvement. However, this could not be by basin.

conditions for the nine participating countries attaining in sustainable fisheries. These other reported benefits include:

- Technical support and capacity building, particularly in relation to fisheries, e.g. guidance on selectivity of fishing gear in Morocco and other technical services (collaboration between fisheries authority and the National Institute of Fisheries Research (INRH));
- The opportunity to improve understanding of different stakeholder's positions and learning what is happening in other countries helped to build trust between national fisheries agencies and fisher groups leading to stronger collaboration and partnership between fisheries agencies, e.g. in Türkiye, Montenegro and Albania (e.g. as part of stakeholder process to establish the Otranto Channel). Several interviewees highlighted the importance of peer learning and to exchange experiences, particularly on technical matters, with other countries which helped broaden their regional perspective. Similarly, representatives from Lebanon underscored the importance of such workshops as rare platforms for dialogue, allowing them to share legislative frameworks, identify gaps, and benefit from direct support from GFCM experts and exchanges with peers (the GFCM-LEX workshop was given as example of where this was particularly useful).
- Increased data and representation from national and local fisher organisations and non-government groups into data considered by GFCM Working Groups and the GFCM Scientific Advisory Committee and feeding into decision making - so more representative of the key target audience for fisheries management, the fishers themselves. This was identified as an especially important benefit from the project by senior GFCM staff.
- Increased trust between national fisheries authorities and local fisher groups – one government interviewee commented that "It's now easier to collect data from fishermen as they now know they need better management".
- Cooperation and communication between experts and national authorities has been valuable and helped build and strengthen national and regional networks.
- Helping to build increased awareness and a better understanding among fisheries sector actors on the need for sustainable fisheries and what needs to be done to move towards these (address gaps), with adoption of common approaches and systems, standardisation of data collection and improved data across the region, providing a foundation to manage the stock (supporting sustainable management).
- Increased capacity to manage fisheries more effectively (e.g. through new data to fill gaps and a better understanding of what is needed to move towards sustainable fisheries) which has been highly valued by participants.

The overall rating for effectiveness is **Moderately Satisfactory**.

4.3 Efficiency

Key MTR question 3 – To what extent is the project being implemented efficiently and cost effectively?

Finding 3.1: The project built on existing GFCM and UNEP/MAP programmes notably GFCM's MedSea4Fish initiative and UNEP/MAP's MedProgramme as well as other experiences and lessons from previous initiatives in the Mediterranean, and particularly with the GFCM Med4Fish initiative, which has supported an efficient delivery of the project.

Finding 3.2: Overall efficiency has been mixed, with both positive and negative factors contributing to efficient delivery of the project. Efficiency, judged on delivery of project activities and results and spending of GEF funds, has been greater for GFCM than UNEP/MAP and SPA/RAC activities.

158. Overall, the efficiency of the project in delivering its results and its management has been mixed. Whilst some factors have supported efficiency, these have varied depending on the executing agency, and there have been several issues that have worked against efficiency.

159. In terms of factors which have promoted efficiency these include:

- GFCM's substantial institutional and technical capacity for fisheries management and established relationships with national fisheries agencies in Mediterranean region and similarly SPA/RAC's status as a regional centre for biodiversity and MPAs for UNEP/MAP and its long-standing relationships with government partners, especially in North African countries.
- Good commitment, capacity and technical expertise within the GFCM project team (the fisheries element was probably not deliverable without GFCM expertise) but less capacity among the UNEP/MAP and SPA/RAC team (and less than expected engagement/commitment by UNEP/MAP office in Athens). However, SPA/RAC staff time was increased in 2024/2025 to try and make up lost time due to delays over cooperation agreements between UNEP (NBO) and UNEP/MAP and between UNEP/MAP and SPA/RAC to begin the project (see below) and consultants contracted to speed up delivery (e.g., embedding a consultant in the Environment Ministry in Montenegro to aid NAP+ work).
- Very efficient, capable GFCM PTM/PC who leads the GFCM project team and is considered a good communicator by the stakeholders and keeps partners regularly updated.
- GFCM's status as Article 14 body of FAO which has helped in the partnership with the GEF Implementing Agency (FAO) and supported its role as the project executing body in part because it has had the ability to call on FAO resources if needed.
- Development of a specific GFCM project monitoring and tracking dashboard and two additional staff joining the project team to support operations and reporting.

160. Factors that have worked against efficiency include:

- Confused weak project design, especially Components 3 and 4, which made interpreting the project a challenge.
- Delays over the International Cooperation Agreement (ICA) between UNEP in Nairobi and UNEP/MAP in Athens, and subsequently between UNEP/MAP in Athens and SPA/RAC in Tunis, which meant that the project elements to be undertaken by SPA/RAC started c.15 months late.
- Delays over appointment of NFPs for environment in some countries (still an issue at the MTR for Morocco).
- GFCM weaknesses in some technical areas e.g. gender, value chain, blue economy, which would have benefitted from more outside support, and SPA/RAC small staff initially coping with multiple projects.
- Slow burdensome FAO procurement processes which have had a particular impact on whether field surveys can be conducted in time (which are very dependent on timing)
- Initial GFCM inexperience with GEF and generally not used to project frameworks with limited initial understanding of GEF rules and FAO budget categories by the GFCM team (there seems to have been an assumption by FAO that GFCM were fully familiar with undertaking projects, but GFCM, being a Commission, does not usually operate on a project basis. This lack of experience was not properly considered at the design stage in the MTR's view. However, FAO gave support when requested).
- Force majeure in Lebanon which caused the project to be on hold for a year in the country. The biggest component of the project in Lebanon has been the survey-at-sea and there was a risk of cancelling it due to the situation (war). However, funding was reallocated from 2024 to 2025, and the survey was able to be undertaken in October 2025. The conflict has also caused delays to SPA/RAC led activities in the country notably on training for addressing NIS and CCA.

161. The delays due to the FAO procurement processes came in for special criticism particularly from non-FAO interviewees. Timing of contracting and procurement can be critical for purchase of field equipment and effective field activities (e.g., at sea surveys). The delays generally relate to the need to have a competitive bid process, but where there are few, perhaps only one, suitable business which can deliver the contract. Both the LTO, based in Rome, and staff at the individual FAO Country Offices have tried to provide support to speed up the procurement process the MTR was told that “there are no shortcuts” and delays are inevitable. Unfortunately, the MTR understands that FAO offers no flexibility over the process, so such delays are likely to occur again in future and affect other FAO-GEF projects (something the GEF should consider in terms of FAO’s efficiency and effectiveness as a GEF IA). This is a weakness of FAO as an Implementing Agency for the GEF.

UNEP/MAP and SPA/RAC delays

162. UNEP/MAP could only begin their activities once ICA was signed with UNEP in Nairobi (signed 08 March 2023). During this period, the PCA could not be signed. However, even when the ICA was approved there was still a delay over the signing of the PCA. According to MTR interviewees, the delay over the PCA was due to ‘a mix up in the budgets’ (budgetary errors, misallocation), which required (although the MTR heard various versions of this and various claims for who was responsible) several exchanges between SPA/RAC and UNEP/MAP to address the issues. The PCA with SPA/RAC was eventually signed 08 April 2024. However, there was a further delay on the transfer of GEF funds so several of the key staff were not assigned to the project until later (including the UNEP-MAP Project Manager who the MTR was informed only took on the project fully in September 2024). This meant that the SPA/RAC activities started 15-18 months after the official start of the project (1 January 2023).

163. Despite questions by the MTR team, it remains unclear why there were delays over both the ICA and PCA, especially as UNEP (NBO), UNEP/MAP and SPA/RAC were all aware that the project was to start on 1 January 2023 and should have been prepared for this.

Efficiency of expenditure

164. Expenditure of GEF budget started very slowly – 19.19% of the GEF funds reportedly spent in the first year (27.92% of the GEF funds allocated to GFCM and none allocated to UNEP/MAP), partly due to delayed recruitment of key project staff (the GFCM TPM/PC was not on board until autumn 2023) and the failure to have a PCA between UNEP/MAP and SPA/RAC in place for the first 18 months of the project (no transfer of funds to SPA/RAC, so no official recruitment of staff or spending of GEF funds by SPA/RAC before then).

165. Expenditure has increased and by the end of December 2025 GFCM had spent 66.75% of its GEF allocation which is respectable at the MTR point. However, spending by UNEP/MAP and SPA/RAC was only 3.5% of its budget by the end of the second year and remains very low at just 18.21% of its GEF budget at the MTR point- see Table 2 above. Spending below 30-35% of the GEF budget at the MTR point is considered a concern, which signifies that UNEP/MAP and SPA/RAC has been very inefficient in their delivery of the project.

The overall rating for efficiency is **Satisfactory**.

Table 2: Expenditure of GEF project budget for 2023-2025 inclusive (figures as of 31 December 2025)

Project component	FAO/GFCM	UNEP/UNEP-MAP	Project budget	2023 delivery		2024 delivery		2025 delivery	
				FAO/GFCM	UNEP/UNEP-MAP	FAO/GFCM	UNEP/UNEP-MAP	FAO/GFCM	UNEP/UNEP-MAP
Component 1: Fisheries/SSF	1,620,767		1,620,767	696,244		126,499		453,300	
Component 2: IUU/MCS	1,408,007		1,408,007	29,187		242,192		452,616	
Component 3: EBM tools	685,676	735,000	1,420,676	432,573		106,095	30,089	38,481	143,885
Component 4: Blue economy	422,808	1,112,000	1,534,808	171,772		20,987	28,734	131,699	104,593
Component 5: KM-Outscaling	273,097	241,689	514,786	6,247		85,326	17,761	77,701	42,556
Sub-total components 1-4	4,410,354	2,088,689	6,499,043	1,336,023	-	581,100	76,584	1,153,797	291,034
M&E: Monitoring & Evaluation	351,550	77,000	428,550	3,548		39,374	-	92,865	23,048
PMC: Project management cost	238,096	108,284	346,380	56,646		35,731	4,051	38,271	19,444
Project total	5,000,000	2,273,973	7,273,973	1,396,217	-	656,205	80,635	1,284,932	333,526

Project Component	2023-2025 delivery			% of total budget spent	Project balance as of 31/12/2025		
	FAO/GFCM	UNEP/UNEP-MAP	Total delivery		FAO/GFCM	UNEP/UNEP-MAP	Total
Component 1: Fisheries/SSF	1,276,043		1,276,043	78.73	282,396		282,396
Component 2: IUU/MCS	723,995		723,995	51.42	583,535		583,535
Component 3: EBM tools	577,149	173,974	751,123	52.87	165,741	561,026	726,767
Component 4: Blue economy	324,458	133,327	457,785	29.83	122,417	978,673	1,101,090
Component 5: KM-Outscaling	169,274	60,317	229,591	44.60	189,645	181,372	371,017
Sub-total components 1-4	3,070,919	367,618	3,438,537	52.91	1,343,734	1,721,071	3,064,805
M&E: Monitoring & Evaluation	135,787	23,048	158,835	37.06	175,964	53,952	229,916
PMC: Project management cost	130,648	23,495	154,143	44.50	142,947	84,789	227,736
Project total	3,337,354 (66.75%)	414,161 (18.21%)	3,751,515	51.57	1,662,645	1,859,812	3,522,457

4.4 Factors affecting performance

Key MTR question 4 - To what extent are implementing and executing agencies effectively discharging their roles and responsibilities? To what extent and how have multi-sector stakeholders at different levels been involved in project design and implementation? How is the project assessing, documenting, and sharing its results, lessons learned and experiences? Is the project's M&E system adequate, practical, and sufficient?

4.4.1 Design and readiness

Finding 4.1: The project's design and framework, as captured in its Results Framework, is complex, lacks coherence, and was poorly designed which has made the execution of project activities challenging and, in some cases, handicapped the interpretation and communication of the aims and results of the project.

Finding 4.2: The formulation of the project objective, outcome statements and the outcome indicators and especially Components 3 and 4 is particularly weak and confused, and some activity sets were not priorities of the participating countries but 'wishes' of external stakeholders. As a result, parts of the project can be characterised as a 'Christmas tree project'. Unfortunately, the description of the project activities in the Project Document is poor in many cases, and many of the activity sets were overly ambitious at the design stage compared to the allocated budget (several activity sets in Components 1-4 are not realistic). Consequently, there has been some 'interpretation' of activities, especially by GFCM, that can deliver results which were feasible and have some impact (viewed as sensible by MTR).

Finding 4.3: There was no clear leadership during design phases, and limited opportunities to meet with stakeholders to discuss the proposed project during its design due to COVID restrictions. Unfortunately, there was also no revision of the Results Framework at inception (a missed opportunity).

Finding 4.4: The 'readiness' of national partners to start the project was not ideal due to lack of engagement during design period (in part due to COVID restrictions on holding meetings), and the UNEP/MAP and SPA/RAC activities were significantly delayed due to issues with cooperation agreements and the transfer of GEF funds. In addition, the GFCM had little experience (and initially limited understanding) of GEF projects, and inadequate consideration was given to context and capacity of countries to engage in project (countries were all at different stages and some still recovering from effects of COVID pandemic).

(i) Project design

166. The project's framework, as captured in its Results Framework set out in Annex A1 of the Project Document, is complex, lacks coherence, and was poorly designed. The formulation of the project objective, outcome statements and the outcome indicators and especially Components 3 and 4 is particularly weak and confused. Unfortunately, the description of the project activities in the Project Document is poor in many cases, and national project participants reportedly found the Project Document confusing and the project viewed as complicated and difficult to understand.

167. Many of the activity sets were overly ambitious at the design stage compared to the allocated budget (several activity sets in Components 1-4 are not realistic). This was due in part to the design of the Results Framework and formulation of the objective, outcomes and outputs and associated indicators. Some activity sets were not priorities of the participating countries but 'wishes' of external stakeholders. As a result, the project can be characterised as a 'Christmas tree project' representing multiple interests and not built around a coherent vision.

168. The project objective - *'to reverse the overexploitation of select commercial living marine resources of Mediterranean countries in support of their blue economy development pathway'* – is outside the reach of the project itself – it cannot 'reverse overexploitation of commercial living marine resources', rather (if successful) it contributes to achieving this in the longer-term along with many other contributing projects and programmes. Another example of poor formulation is Outcome 3 - 'Healthier marine

ecosystems with more productive fisheries in place, through the synergistic application of ecosystem-based conservation/ management tools and improvements in fisheries tenure governance', the phrase '*Healthier marine ecosystems*' relates to a higher aim in the Theory of Change (to which the project will contribute to but cannot itself achieve), '*more productive fisheries*' relates more to the project objective level, and '*through the synergistic application of ecosystem-based conservation/ management tools and improvements in fisheries tenure governance*' again addresses the means to achieve the outcome. Component 4, targeting blue economy actions, is still very unclear to the project staff and partners, and it still needs clear definition of what the scope of the work should be and what the specific activities it should include.

169. Also, some of the outputs (which the project should be completely deliverable by a project), are closer to outcomes (to which a project contributes and represents a change in status, systems or behaviours), or are worded vaguely. For example, Output 1.4 '*Reinforced synergies with the private sector to support market-driven opportunities in the fisheries sector*' (and it is not clear what the specific deliverable here is, and 'synergies' is not defined) and Output 2.5 - '*International Plan of Action to fight IUU, and Regional Plan of Action to fight IUU implemented through national plans of action, including measures to reduce bycatch and abandoned fishing gearing (several of the project outputs are contributing to addressing IUU)*' is more an outcome-level result as it cannot be achieved by the project itself but only through a wider Government-led process.
170. In addition, many of the outcome indicators are either very complex with multiple dimensions, or restatements of outputs linked to the outcome, rather than outcome-specific indicators or have little if any connection with their associated outcome. For example, for Outcome 1 ('*Fisheries managers and stakeholders use sound information generated on the status of key commercial fisheries*'), the first indicator - '*Number of countries where data collection campaigns/surveys have been carried out to collect biological and gender-disaggregated socio-economic data*' – does not indicate whether that information is being used in fisheries management (or how), just that some information has been collected, and the fourth indicator - '*Number of stakeholder organizations – including women's organizations – having received capacity development support*' is very non-specific - it doesn't define what kind of capacity is being built, (or even if it is related to fisheries) and this formulation could apply to many projects where capacity is being built. And the final indicator for Outcome 1 - '*Number of countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers*', does not relate to the outcome at all which addresses data to improve fisheries management.
171. The design of Component 3 is particularly confused and not very coherent with poor explanation and detail in the Project Document, and it is unclear particularly what was intended as there is a mix of quite different activity sets. For instance, monitoring of environmental parameters and development of CCA strategies (both included under Output 3.2) address quite different issues and should have been treated under different components and outputs. Also as mentioned above, Component 4 with its focus on 'NAP+' can be said to lack clarity. Consequently, it is not surprising that the project's aims, outputs and associated activities were unclear to many MTR interviewees.
172. According to an MTR interviewee involved in the design of the project, some elements such as Output 1.5 '*Participation in the regional network of SSF platforms reinforced in order to provide social protection support to its members*' and Output 3.4 '*Training programmes and case studies to strengthen national capacity towards the development of fisheries tenure interventions (referring to gender-responsive training programmes and case studies)*' were apparently 'added' to the project at the request of FAO (Output 1.5), the GEF Secretariat (notably Output 3.4) or other external actors rather than coming from the countries themselves. According to MTR interviewees, several quite separate activity sets were added to meet different interest groups who were keen to secure funding for their activities. This is particularly concerning given the overall GEF budget is relatively low given

the project's ambition and number of issues to be addressed which has meant many individual activity sets have inadequate funding to make a real difference. Again, this especially applies to Components 3 and 4.

173. The poor, confused design of the project has made the execution of project activities challenging and, in some cases, also handicapped the interpretation and communication of the aims and results of the project, and meant that there has had to be some 'interpretation' of activities, especially by GFCM that can deliver results which were feasible and have some impact - given the circumstance, the MTR agrees with this pragmatic approach (UNEP/MAP and SPA/RAC appear to have tried to execute the project even if their teams recognised that some elements were not clear or coherent).
174. Overall, many of the key elements of the project were poorly formulated and indicators to measure their achievement are not SMART²⁹ and the project is less coherent than it should have been (and an example of what is commonly called a 'Christmas tree project'), reflecting multiple interests at the design stage. The responsibility for this lies firmly with the project design team, and FAO and UNEP as the IAs. In the MTR's view, especially given that some project activity sets were not feasible (see above section on Effectiveness) the outcomes statements and associated indicators and contributing outputs should be reviewed and revised or replaced. Unfortunately, this did not happen at the inception stage.
175. Unfortunately, key individuals involved in the design process were not available to the project team when the project started, and the Project Document appears to have been submitted to the GEF Secretariat without a thorough review and errors corrected. Indeed, the design phase was characterised by several interviewees as 'messy' or 'confused', and does not appear to have had sufficient discussion, inputs and engagement from the national fisheries agencies. This resulted in some initial disagreement and confusion during the inception phase over the scope and budget of the project. The TPM/PC and FAO LTO had little or no involvement in the project design and have similarly struggled to understand the rationale behind inclusion of some activity sets and outputs.
176. MTR interviews revealed that SPA/RAC had relatively little input to the design of environmental elements of the project, rather this was led by UNEP-MAP. SPA/RAC undertook the bulk of the project activities relating to marine conservation and biodiversity on behalf of UNEP/MAP, who played a largely oversight role. It is not clear to the MTR why UNEP/MAP with its capacity did not undertake the work themselves as SPA/RAC had low capacity and has needed to contract out much of the activities to external consultants (which UNEP/MAP could have done itself). With hindsight this may have been a better arrangement (and avoided delays over the PCA). Instead, UNEP/MAP's focus has been on their own GEF-funded projects under the MedProgramme. The FishEBM MED project was seen as a small 'add on' project to address the missing fisheries element. Consequently, it probably did not receive the attention it needed by the UNEP/MAP office in Athens.
177. The original idea – championed by the GEF Secretariat - was to bring a Regional Fisheries Body (RFB), in this case GFCM, and a Regional Seas Body, in this case UNEP-MAP, representing the fisheries and environment sectors respectively to work collaboratively on fisheries management in the Mediterranean that better integrated fisheries activities in general management of the marine environment (by UNEP/MAP) and conversely gave greater attention to key environmental/biodiversity issues in fisheries management (by GFCM), based around the Ecosystem Approach. This would, for instance, introduce fisheries as a major use of natural resources in the Mediterranean to the UNEP/MAP MedProgramme, and GFCM would integrate considerations on wider environmental influences, such as pollution hotspots into fisheries management.
178. Unfortunately, there was a large design team involved in designing both the complex mix of FAO-GFCM and UNEP/MAP-SPA/RAC project activities, but according to MTR interviewees it was not clear

²⁹ Specific, Measurable, Achievable, Realistic, Time-bound.

who was really leading the process and had the decision-making authority, and nobody appears to have provided a clear strategic and unified vision for the project, marrying both the fisheries and environment elements. As a result, the two separate groups largely designed activities independent of each other, who saw opportunities to fund elements of their own existing programmes. This is reflected in the project's (poor) Theory of Change where linkages and relationships between core elements of the project (Outputs and Outcomes) are simply depicted as a series of arrows and not explained (see above). Consequently, the causal logic linking the two different sets of project activities – those led by GFCM and those by UNEP/MAP and SPA/RAC – and how combined they might lead to higher level impacts, such as 'Healthier marine ecosystems with more productive fisheries in place', is unclear.

179. The FAO-GEF Unit had overall responsibility for shepherding the project through the review process. In the MTR team's opinion, the GEF Unit could have paid more attention to ensuring the design was coherent, much more integrated, and joint activities and partnership arrangements between GFCM and UNEP-MAP and SPA/RAC were more clearly designed and practically implementable. However, the MTR accepts that the 'patchiness' of the design of the project was heavily influenced by the main project design phase (development of the ProDoc) taking place during the COVID pandemic, which was an extraordinary period and presented exceptional challenges for the design team and associated stakeholders.

(ii) Choice of executing partner for specific fisheries management related project activities

180. It is surprising that the study 'State of waste management practices on fishing vessels in the Mediterranean Sea: Review of common sources, regulatory frameworks, and port waste reception facilities' was undertaken by SPA/RAC (UNEP/MAP-SPA/RAC 2025), without greater and earlier involvement by GFCM since it is a clearly a fisheries management issue that overlaps with the remit of GFCM. Indeed, the text of the document references GFCM and key issues for which it has a concern, e.g. ALDFG, throughout the document, but only mentions a single previous SPA/RAC study (which was presumably the justification for why UNEP/MAP-SPA/RAC should lead on this activity). It is especially puzzling (to the MTR) since GFCM and FAO do not appear to have been heavily involved in producing this study. This highlights that some of the project's fisheries management activities were assigned specifically to UNEP/MAP-SPA/RAC rather than jointly with GFCM.

(iii) Involvement of stakeholders in the design of the project

181. Stakeholder and partner involvement at the project design stage was mixed, with some countries reporting limited or no engagement during project formulation. The national fisheries and environment agencies, as the main recipients and beneficiaries of the project were reportedly not adequately consulted in many cases during the design stage. Indeed, when the project started some countries, such as Türkiye, had very little knowledge or understanding of why some activities identified for their country have been included in the project. Consultation tended to focus on the more reactive countries, such as Morocco and especially Montenegro which has separate GEF Biodiversity Focal Area funding allocated to the project and is targeted for a specific activity set (the NAP+ under Component 4).
182. This has been explained as due to COVID restrictions which limited the usual face-to-face design-phase meetings, although there was still very limited discussion over drafts of the PIF and Project Document documents (outline of project components and activities were shared with the national partners as they were developed) which were not shared widely among stakeholders for detailed comment before submission (apparently encouraged by the GEF Secretariat to shorten the consultation process). Whilst the MTR understands the rationale the consequence is that the project did not have the level of

stakeholder participation and inputs and quality assurance oversight it required, which has resulted in many of the issues that have negatively affected its execution.

183. This contributed to initial challenges over ownership, alignment, and understanding of the project's objectives and scope. According to interviewees the Turkish authorities, for instance, were dissatisfied with the selection of project activities as they were not properly considered during the design phase and did not reflect national views and priorities. However, stakeholder engagement and ownership improved during implementation as elaborated above.

(iv) Readiness of partners

184. The 'readiness' (ability to begin the project and carry out project activities) of national partners to start the project was also not ideal due to lack of engagement and ownership during design period (in part due to COVID restrictions on holding face-to-face meetings). In addition, the GFCM had little experience (and initially limited understanding) of GEF projects. Also, the PMU team was not fully in place until October 2023, some 10 months after the official start of the project (1 January 2023) and PCA between UNEP/MAP and SPA/RAC meant that the SPA/RAC team could not begin work until June 2024 so neither executing partner was 'ready' to undertake the project when it began.
185. Furthermore, no capacity assessments of national partners' ability to engage in the project were undertaken either during the design phase or later at the beginning of the project. An assessment at the project inception stage would have been valuable given that all 9 countries were recovering from COVID in early 2023, and all have quite different levels of capacity to implement the diverse mix of project activities requested of them.

4.4.2 - Project implementation and oversight

Finding 4.5: FAO provided adequate operational and technical support, especially through the LTO, but the GFCM team would have benefited from more instruction on GEF requirements at the beginning of the project. The FAO project procurement process was felt to be burdensome and time-consuming and not very adaptive by partners - it introduced delays, particularly in relation to approval for funding for field missions and purchase of related equipment.

Finding 4.6: Oversight and managerial and technical support provided by UNEP/MAP to SPA/RAC has been limited and should be increased, with responsibilities and reporting lines unclear at times which need to be better clarified and documented.

Finding 4.7: The Project Steering Committee (PSC) was viewed as most useful for participants to learn about progress on project activities but was not seen as a very participatory, decision-making forum by most interviewees.

Finding 4.8: FAO and UNEP, as the two GEF IAs, appeared to have allowed GFCM and SPA/RAC and UNEP/MAP to largely operate independently, and the PSC, as the project's ultimate oversight body, does not appear to have questioned whether the intended overall integrated approach of the project was being delivered, and has been unable to bring the UNEP/MAP and SPA/RAC and GFCM groups closer together into a more unified project.

(i) Oversight by FAO

186. FAO, in its role as the GEF IA, has generally provided good operational support to the project particularly through the Lead Technical Officer (LTO). The LTO's contribution has been particularly helpful as he has previous experience of managing GEF projects and has provided more strategic

guidance and advised the GFCM project team on GEF rules, requirements and processes, but he has facilitated connections to specific people within FAO and beyond.

187. According to interviewees, it was felt that FAO has needed to provide generally less technical assistance than usual as GFCM already had high technical capacity in fisheries management (a major strength and one of the reasons for choosing GFCM as executing partner for this project). Also, GFCM is an FAO Article 14 body which gives it strong governance and operational capacity (with strong accountability to its members), and part of the FAO system similar processes and procedures which benefits transparency and responsible stewardship/supervision of the GEF grant. However, this also means that the project was tied to what many interviewees considered 'burdensome' FAO procurement practices.
188. However, GFCM lacked the experience of GEF projects and FAO probably could have provided more support at the inception stage on GEF requirements and given the GFCM team acknowledged weaknesses in the areas of KMC, gender and stakeholder engagement, FAO should have provided greater support in these areas as well. There seems to have been an assumption by FAO that because GFCM has high fisheries management capacity, it also had high capacity in these other more generic and project-associated areas.
189. Project execution was carried out under the OPIM modality with FAO, and under the OPIM agreement, FAO's Division of Fisheries and Aquaculture (NFI) at Rome HQ provides support to GFCM, with the FAO Budget Holder (BH) residing in NFI, and to which the project's LTO is attached. Although FAO has Country Offices across the Mediterranean, they have been little involved with the project, mostly supporting the FAO procurement process when needed (mostly done through FAO HQ).
190. The FAO-GEF Unit has also provided support over the life of the project, principally through a GEF Technical Officer (GTO, appointed in August 2020) and a Funding Liaison Officer (FLO). However, there was less support from the FAO-GEF Unit available during the design phase of the project due to COVID, when its focus was on shepherding the draft Project Document through the GEF review process. Since implementation began, the FAO-GEF Unit has largely provided support through review and inputs to draft PPRs and PIRs through the FAO-GEF Unit's M&E team, and the GTO has attended key meetings including the PSC meetings, given regular feedback on the project, and helped promote the project such as at IW:Learn meetings.
191. UNEP, headquartered in Nairobi, Kenya, is the junior GEF Implementing Agency for the project, so most of the oversight responsibility falls on FAO. UNEP does provide inputs on reporting (notably financial) but has not played a significant role in other project oversight aspects. For instance, a UNEP International Waters Task Manager is recorded as having attended only one PSC meeting (the combined inception and PSC meeting in February 2023), although UNEP/MAP representatives have attended them all.

(ii) Project Steering Committee

192. There has been three project Steering Committee (SC) meetings up to 31 December 2025, held annually on 8-9 February 2023, 19 February 2024 and 24-26 February 2025, with an additional informal online mid-year SC meeting held on 18 September 2024, at the request of the earlier SC meeting participants so that there were more regular updates on the status of the project's work plan implementation throughout the year. Documentation and minutes of these meetings are comprehensive and informative. The PMU briefs individual project partners on planned activities and budgets prior to each SC meeting which makes the meetings more effective.
193. Some interviewees characterised the PSC meetings as 'formal' and not a venue for exploring ideas and joint decision-making. It was felt that the PSC was not important as a decision-making forum, which

was not viewed as especially participatory (rather budgets and workplans which had been discussed beforehand were presented for endorsement and had few changes). One issue raised by one MTR interviewee was whether the meetings included all relevant voices (the MTR recognises that there is limit to stakeholder representation), particularly fisher groups (as opposed to government representatives).

194. National participants mostly valued the PSC meetings as an opportunity to learn about progress on the on the project (KMC) and for networking with other participants. Some NFPs interviewed highlighted that the annual PSC committee meetings were often the largest interaction between fisheries and environment NFPs on the project and consequently identified these meetings as a valuable platform for exchange, enabling countries to share experiences, benefit from technical expertise, and adapt practical solutions to their own national contexts.

4.4.3. Project management and execution

Finding 4.9: There has been good execution by a very competent, professional and engaged GFCM project team which has high technical capacity in most relevant areas and stakeholders interviewed by the MTR universally praised the support from the team. The GFCM team is led by very efficient and highly capable PTM/PC. However, she is the PTM/PC for both the FishEBM Mediterranean and Black Sea projects so has less dedicated time available for technical support for the gender and socio-economics areas of the project for which she is the lead.

Finding 4.10: There was a slow start to project execution by GFCM (partly due to lack of experience of GEF and day-to-day project management and late appointment of key project personnel) but GFCM introduced a dedicated project management system and employed two additional staff (shared with the FishEBM Black Sea project) to support operations and speed up delivery, monitoring and reporting, which has enhanced project delivery and efficiency, and has been good execution by GFCM project team since. Risk monitoring and mitigation has been adequate, and the overall risk for the project remains 'low', but the risk analysis needs to be regularly revisited as several potential risks could impact on the work of the project.

Finding 4.11: There have been very significant delays in both UNEP/MAP and especially SPA/RAC starting their project activities, largely due to delays over the signing of the International Cooperation Agreement (ICA) between UNEP in Nairobi and UNE/MAP in Athens, and then over the Project Cooperation Agreement (PCA) between UNEP/MAP and SPA/RAC in Tunis, which determine the transfer and availability of the GEF finding for project activities. This meant that SPA/RAC could not start their activities (mostly related to Components 3, 4 and 5) until June 2024, some 18 months after the project officially started. To try and address this, SPA/RAC introduced additional human resources (although it has had to rely heavily on consultants) but has not yet caught up.

Finding 4.12: The SPA/RAC team comprises a group of professional, technically experienced individuals but there has been confusion over who is the team leader (which has been divided), further complicated by another layer of unclear management and reporting under UNEP/MAP. In addition, support from UNEP/MAP has been inadequate and at times confusing.

Finding 4.13: Consultation and coordination between UNEP/MAP and SPA/RAC and GFCM on project activities has been very limited and the project does not 'showcase the GFCM/MAP approach' that is promoted in the Project Document. The project design did not have an adequate structure for coordination and reporting between UNEP/MAP, SPAR/RAC and GFCM, and few common activity sets were developed (some limited coordination on KMC).

(i) Project team composition and execution - GFCM

195. The GFCM project team consists of the Technical Project Manager/Program Coordinator (TPM/PC), supported by a financial administrator and two operations support personnel, along with a consultant

who leads on the project KMC. All these positions are shared with the FishEBM Black Sea project. In addition, a variety of other GFCM staff provide support and/or lead on various technical aspects of the project associated with Components 1-3.

196. The very competent, professional GFCM team, led by a dedicated and very capable TPM/PC, has coped well with the challenges posed by delivering a complex regional project (while also delivering the sister FishEBM Black Sea project) despite its relatively small project budget relative to the tasks assigned to GFCM and overall ambition of the project. The MTR noted that there was wide praise for the support provided by the GFCM team from fisheries sector interviewees.
197. In some respects, having same TPM/PC for both the FishEBM Mediterranean and Black Sea projects has helped deliver each project more effectively due to the sharing of personnel and activities, covering areas such as KMC and M&E and reporting. However, the TPM/PC also backstops specific technical areas, including socio-economic surveys, small scale fisheries engagement, and gender for both projects as she is the focal point for these areas within GFCM, but due to the high demands of being the TPM/PC for both EBM projects, has had relatively little time to spend on these areas, which require additional support. In the MTR's view, the TPM/PC's time would be better spent if she could delegate the more technical aspects of her work - KMC, gender, socio-economics - to others for the remainder of the project as it would improve efficiency (and for Black Sea project as well). A project coordinator position is usually challenging just for a single FAO-GEF project, but the TPM/PC is responsible for two projects.
198. There was limited experience of operating on a project basis within GFCM when the project started, and no experience of GEF project management within current project team. This led to delays, so GFCM sensibly introduced a dedicated project management system – a GFCM 'project dashboard' - and employed two additional staff to support operations and speed up delivery, monitoring and reporting, which has supported project delivery and efficiency. This will be useful for future projects at GFCM.

(ii) International Cooperation Agreement (ICA) and Project Cooperation Agreement (PCA)

199. There have been very significant delays in both UNEP/MAP and especially SPA/RAC starting their project activities, largely due to delays over the signing of the International Cooperation Agreement (ICA) between UNEP in Nairobi and UNE/MAP in Athens, and then over the Project Cooperation Agreement (PCA) between UNEP/MAP and SPA/RAC in Tunis, which determine the transfer and availability of the GEF finding for project activities. This meant that SPA/RAC could not start their activities (mostly related to Components 3, 4 and 5) until June 2024, some 18 months after the project officially started. To try and address this, SPA/RAC introduced additional human resources (although it has had to rely heavily on consultants) but has not yet caught up.
200. Both the ICA and PCA are due to lapse in 2026 (the MTR was given different dates by different people), so UNEP/MAP, SPA/RAC and UNEP need to urgently extend these two agreements as the MTR understands that once they finish no further transfer of GEF payments can occur between UNEP to UNEP/MAP and from UNEP/MAP to SPA/RAC so project activities associated with UNEP/MAP and SPA/RAC would cease³⁰.

(iii) Project team composition and execution – UNEP/MAP and SPA/RAC

³⁰ A UNEP (NBO) reviewer commented that 'The technical completion date of the original ICA was 31 August 2026, and it was extended in December 2025 to 31 December 2026, and will be further extended following the MTR recommendations.'

201. The UNEP/MAP management and technical team comprise a MedProgramme Project Manager who provides technical as well as operational guidance (although his role and level of involvement was unclear to a number of interviewees, suggesting that roles and responsibilities had not been adequately communicated), with support from a staff member who advises on gender for the MedProgramme and overseen by the MAP Coordinator.
202. The SPA/RAC team consists of a Technical Project Manager, Programme Officer (ecosystem conservation), a Programme Specialist, Communication Officer, an additional SPA/RAC member with Blue Economy experience, and a Financial and Administrative Assistant, overseen by the Director of SPA/RAC, although the number in the team, its composition and time allocated to the FishEBM project has varied.
203. The MTR found confusion over roles and responsibilities among both the SPA/RAC and UNEP/MAP groups and their interaction with each other. The FishEBM project only officially became part of the Terms of Reference for the UNEP/MAP Project manager in September 2025 (shortly before the MTR interview), yet he had been involved in the design phase and several interviewees stated he had been responsible for advising the SPA/RAC team since they started activities, mostly on KMC but also other areas as well as monitoring progress and reporting. Also, within the SPA/RAC team, confusingly, there appear to be two leads – the Technical Project Manager and Programme Officer (ecosystem conservation). It would have been useful if a clear description of roles and responsibilities with a specific organogram showing relationships between the key individuals had been included in the Project Document.

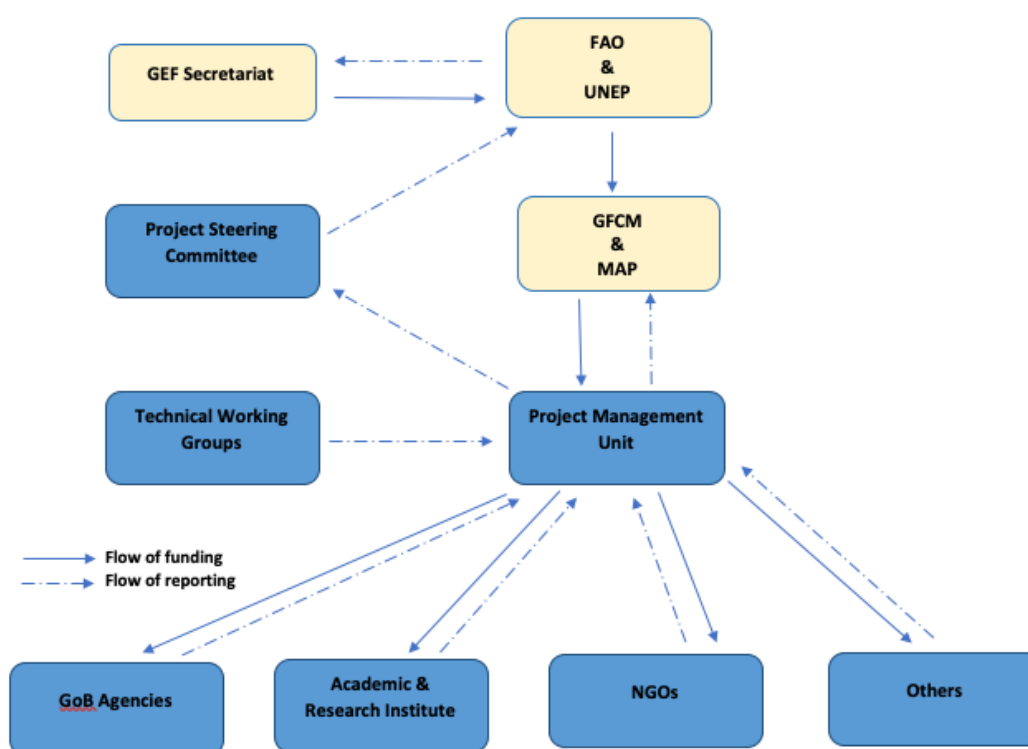


Figure 2: Project organization structure (from FishEBM Project Document)

204. Unfortunately, details on the project's execution arrangements were only sketchy at the design stage, and the relationship between GFCM and UNEP/MAP as the two executing bodies was not adequately explained (e.g., which organisation had responsibility for what and how they should coordinate on project management, such as on reporting). According to an interviewee with knowledge of the design phase there was to be a single joint Project Management Unit (housed at GFCM and with some SPA/RAC staff) but this has not happened as the UNEP/MAP and SPA/RAC team members involved in

the project are housed in Athens or Tunis respectively. In the MTR's opinion, management and delivery of the project would probably have been more effective and efficient if there had been a single PMU office with key SPA/RAC staff (at least the SPA/RAC lead team member) housed in the PMU with the rest of the team. The MTR notes that the UNEP/MAP Project Manager is actually based in Rome but does not operate out of the GFCM office.

205. In addition, SPA/RAC, although mentioned in the text, is not included in the organogram given in the Project Document (see Figure 2). There is no written agreement between GFCM, UNEP/MAP and SPA/RAC on who leads, who manages and/or reports to whom, etc. There is an old MoU between GFCM and UNEP/MAP signed in 2012 but this very general and not specific for the FishEBM project, and although the MTR was informed that overall responsibility rested with GFCM, the GFCM TPM/PC has no official role in overseeing any of the SPA/RAC (indeed the MTR noted resistance to having any of the UNEP/MAP or SPA/RAC overseen by a single coordinator). As a result, the two groups have largely operated separately which has been a weakness in the project's design and execution.
206. One advantage the project has had is that the FAO GTO with responsibility for the project previously worked in the UNEP-MAP office in Athens, had been involved in the early design of the project, and later took up a position at FAO as the GTO in the FAO-GEF Coordination Unit. He had responsibility for shepherding the draft Project Document through the GEF review process on behalf of FAO. Nevertheless, when it came to implementation, the two sets of parties – FAO and GFCM and UNEP-MAP and SPA/RAC – have not worked closely together.
207. At the MTR point, the project can be characterised as two essentially separate projects with little alignment – a larger fisheries management project led by GFCM and a (separate) marine environment management, with fisheries elements independent of GFCM or FAO, led by UNEP/MAP and SPA/RAC. Indeed, interviewees commonly described the two sets of partners as “each just doing their own thing”.

(iv) National Focal Points

208. There are two national focal points (NFPs) for each country one covering fisheries and the other covering environment, representing their respective ministries - GFCM identified national focal points in the fisheries agencies, and UNEP/MAP and SPA/RAC for national focal points in environment ministries. When these are both under the same government ministry there was greater collaboration and cooperation on project activities, but when they are in different ministries there has generally been considerably fewer joint activities. This was illustrated during one interview when the MTR learnt that the fisheries and environment NFPs, under different ministries in the country, had only met by accident in the corridor the week before which was the first time they had met in the nearly three years of the project!
209. Another issue has been that SPA/RAC has its own focal points in most of the Mediterranean countries (as does UNEP/MAP) and there was interest in selecting these as the project NFPs but this did not happen in every case, as it was up to the countries to nominate them. This introduced delays in identifying and nominating some of the environment NFPs, which further delayed some SPA/RAC activities. There has also been a turnover of some NFPs, with the replacement needed time to get up to speed with the project, and some of the environment NFPs seemed particularly uninformed about the project (or not uninterested). There was also apparently some confusion over whether and/or to what extent the national GEF Operational Focal Points should be included in the project.

(v) Risk management

210. Risk identification and management is adequately reported in the PIRs. Risks were reviewed again as a group exercise during the MTR and an updated risk assessment and mitigation produced (see Table

3). The project will need to continue to monitor for evolving risks that could impact the delivery of the project in the next 2-3 years.

211. An increasing risk that could have negative consequences for the medium to long term support (notably financial) for sustainability and continued impacts of the project results is due to recent changes in the global political and economic arenas (e.g., reduced engagement in international development and environment policy and funding processes by many governments, introduction of trade barriers, etc).

Table 3: Risks to achieving Outcomes (GEF table)

RISK CATEGORIES	RATINGS	ASSESSMENT AND MITIGATION MEASURES
CONTEXT		
Climate	Low	Climate-related risks are not expected to significantly influence the project's overall outcomes, and the ability to mitigate these risks lies only partially within the project's direct control. Nonetheless, the project is actively advancing the integration of climate-related considerations into fisheries management and management of the marine environment in the Mediterranean. In particular, it is improving knowledge on non-indigenous species (NIS) which are increasingly present due to warming sea temperatures, including by exploring market-based solutions for these species (although not a major part of the project), supporting the sector's capacity to adapt to climate change, e.g. SPA/RAC led workshop to better address climate change in fisheries particularly in relation to MPAs.
Environment and Social	Low	At the PIF stage, the project underwent an environmental and social safeguards screening and was categorized as presenting <i>low</i> overall environmental and social risk. This classification reflected the limited likelihood of significant adverse impacts and the project's restricted footprint. Continuous monitoring over the course of project implementation has not identified any additional environmental or social risks. The MTR considers the environmental and social risks to the project have not changed significantly and remain low. Indeed, it can be argued that the project's efforts to improve fisheries management and marine biodiversity conservation efforts in the Mediterranean Sea to move towards more sustainable fisheries reduces environmental risk as well as improving social sustainability through supporting more sustainable fisheries livelihoods.
Political and Governance	Low	Overall, the project has benefited from a robust governance framework (underpinned by GFCM, which is a FAO Article 14 body, and UNP/MAP as long-standing institutions with member consistencies and strong governance), supported by strong political commitment to its objectives across participating countries. Improved coordination between environmental and fisheries administration could support further mitigation of any risks that may emerge. Also, regional governance is becoming more important with greater support at regional level and interest, and the G7 declaration on IUU fishing also highlights the role and importance of RFMOs.
INNOVATION		
Institutional and Policy	Moderate	The project benefits from strong existing institutional frameworks, as its Executing Agencies are the Regional Fisheries Management Organization (RFMO) and the Regional Seas Programme (RSP)

		responsible for the Mediterranean region. However, there are no new 'innovative' institutional frameworks have been created through the project (or were intended to be). However, the project does have some relatively untested policy and planning related aims. The most notable relates to the NAP+s which have not been developed previously. Unfortunately, there was considerable confusion among MTR interviewees over the scope and process to develop these with very low ownership, which constitutes a risk to their delivery by the project and raises questions about the potential impact of this project activities. Consequently, this is rated as 'Moderate' by the MTR. There is a particular risk with the delivery of a NAP+ in Montenegro given the very limited time available before the end of the project (December 2026). The MTR understands that this will receive additional attention by SPA/RAC in 2026 to ensure progress. In addition, the Ecosystem Approach is still relatively new for the region and there is a risk that the scientific results and guidance produced through the project may not be understood or accepted. However, whilst some uncertainty always exists regarding political uptake of scientific advice, this risk is reduced by the involvement of national administration focal points (i.e. officials directly engaged in policy decision-making) in the Project Steering Committee, which facilitates project alignment with national priorities, as well as GFCM's SAC guidance on EAFM, strengthens ownership of project activities and increases the likelihood that project recommendations will be adopted.
Technological	Moderate	The project has introduced several new technologies and innovative methodologies (e.g., VMS transponders, eDNA metabarcoding, gear sensors, fishing technology modifications, etc.), each carrying an inherent risk that they may not fully deliver the expected outcomes. To mitigate this risk, the project has adopted a phased piloting approach to assess technical feasibility and operational suitability before any large-scale deployment (i.e. full procurement of equipment or the development of regional application protocols). In addition, a sustainability plan will be developed in the last 6 months of the project which will address long-term financing of these issues. This is likely to be supported given national government interest in the project results (especially for the project's fisheries-related results). Uptake and sustainability of the project results is judged more likely in some countries notably those seeking EU accession (Albania and Montenegro).
Financial and Business Model	Not rated	Again, the project has not developed any new, untried or 'innovative' financial or business models, so this category of risk is not relevant. Rather the innovative aspects of the are largely technical in nature.
EXECUTION		
Capacity for Implementation	Moderate	The project benefits from executing agencies with strong institutional systems, experienced technical staff, a strong network of national institutions and experts, and effective coordination mechanisms. Its proven operational capacity and robust monitoring arrangements provide a solid foundation for successful project delivery. However, UNEP-MAP/SPA-RAC experienced significant delays in signing their Project Cooperation Agreement (PCA), which in turn postponed the start of activities under their responsibility. This has increased the risk associated with their capacity to implement the project in a timely manner. To try and mitigate this SPA/RAC has increased the staff capacity available to the project and both UNEP/MAP and SPA/RAC

		were to focus more on ensuring adequate resources to ensure delivery in 2026.
Fiduciary	Low	The project benefits from a strong M&E team that has developed effective management instruments, including detailed financial-tracking tools that link budget commitments directly to the monitoring of progress toward project outputs and objectives. FAO also checks budgets and payments and financial records as part of its responsibility as lead IA (OCB and BH office in NFI), and the project follows FAO (UN approved) procurement practices to ensure transparency and value-for money. Similarly, SPA/RAC and UNEP/MAP have mechanisms in place to ensure financial management and oversight.
Stakeholder	Low	The project has been highly effective in engaging stakeholders at all levels, from institutions to scientific experts and fishers and local groups (both by GFCM and SPA/RAC). Notably, it has reinforced technical-scientific capacity on select topics, building strong collaborative networks among scientific experts and strengthening their contribution to regional knowledge exchange.
Other	< Select rating >	< Insert text >
Overall Risk Rating	Moderate	Overall, the project continues to be assessed as low risk, with no significant new risks emerging during implementation. Delays in implementation by UNEP-MAP/SPA/RAC have increased the project risks with respect to capacity for implementation. The rating reflects the weight of moderate risks

4.4.4. Financial management and co-financing

Finding 4.14: There were no reported significant major issues with financial management within the project, although it took GFCM time to understand how the GEF project budget had been organised, and the delays over the ICA and PCA meant that SPA/RAC did not receive its budget, and could not start project activities until the middle of the second year of project implementation, the transfer of funds from UNEP/MAP to SPA/RAC was often slow which further complicated delivery.

Finding 4.15: The extent of co-financing is difficult to assess, although the mix of original co-financiers has changed and it not clear what individual co-financier's contribution has been provided (e.g. the stated amount by UNEP/MAP is questionable). However, significant additional 'leveraged' project co-financing that has not been reported on (both SPA/RAC and GFCM have additional 'leveraged' co-financing).

(i) Management of project finances

212. There have been no major issues with financial management of the project, with 75.8% of the GEF funds spent up to 31 December 2025. However, as noted above, disbursement by the end of the second year which was closer to when the MTR should have taken place, was only 18.27% of the GEF funds.

213. Interviewees (both regional and national, and with the project team) reported that they struggled to understand the FAO project budget at the start of the project, so at the second project steering committee (19 February 2024) it was agreed to reorder the budget and adopt a budget broken down according to outputs and activities making it more comprehensible to the project partners. Consequently, given the level of confusion over the budget, it may be helpful if the FAO-GEF Unit could

prepare a briefing document and standard support package that could be provided to FAO-GEF project teams at the inception stage (indeed developing a comprehensive 'FAO-GEF project manual' would be helpful for project teams which the FAO-GEF Unit should consider as such a document is currently lacking).

214. One area where there has been an issue in terms of financial management has been the delays to transfer of funds created by the late signing of the ICA between UNEP and UNEP/MAP and the PCA between UNEP/MAP and SPA/RAC which meant that the GEF funding did not reach SPA/RAC until some 15-18 months after the project officially began and most of those project activities led by SPA/RAC could not begin until mid 2024.
215. The MTR was also informed that there have been delays over the transfer of the GEF funds from UNEP/MAP to SPA/RAC, and a claim was made to the MTR that UNEP/MAP deducts 13% of the funds transferred to SPA/RAC for 'administrative purposes' so SPA/RAC does not receive the full amount.³¹ The original project budget did not have a dedicated UNEP/MAP PMC element, but this was re-examined shortly after the project began and the total amount assigned to UNEP/MAP constitutes 5% of project budget which UNEP/MAP stated covered costs of a M/E expert (assigned to the IW expert), KM expert (to be recruited for Q4/2026 to Q2/2027, management of the KM platform to be assigned to the KM expert, and travel to meetings of US\$ 8000. However, it should also be noted that UNEP/MAP is listed as a provider of co-financing to the project (see below) which would be expected to cover at least some of the PMC costs.

(ii) Co-financing

216. The latest figures on co-financing available to the MTR were those presented in the 2025 PIR. No information was available on the breakdown spending of co-financing according to Component.
217. Some of the co-financing pledged at the PPG stage appears not have been delivered, such as the in-kind co-financing from the private sector company Catapult CX for US\$ 11,150,000 pledged at the project's CEO endorsement stage (Catapult has not been involved in the project). In another case, an error was made in the UNEP/MAP co-financing reported in the 2025 PIR which showed combined totals for 2024 and 2025 by mistake – a total of US\$ 3,567,493. Unfortunately, the error was included in the 2025 PIR report which has already been sent to the GEF in the 2025 PIR report). It is suggested that UNEP/MAP send a note to GEFSEC explaining the error and a note made in the 2026 PIR explaining the error'.
218. On the other hand, there has been some significant new 'leveraged' co-financing that has not been reported on or fully captured, including in-kind contributions made by local stakeholder groups and individuals participating in the project (mostly through their time in attending project events and meetings, providing information for surveys, etc). For instance, the Government of Italy (through its fisheries agency) provided support to the project for the assessments in the Adriatic to help establish the FRA (Otranto Channel – see section on Component 3 above) but this has not been captured and reported on as cofinancing³².
219. Consequently, the mix of co-financiers and level of co-financing have changed since the project design period and needs to be updated, and a more detailed breakdown and analysis of the co-financing should be provided for the 2026 PIR. Greater guidance on how to identify and capture co-financing also needs to be provided to the project team by the FAO GEF Unit.

³¹ A UNEP/MAP reviewer commented that it 'was not clear where the figure came from'. The figure was communicated during an MTR interview. However, as this was a confidential interview details therefore cannot be provided.'

³² The under reporting in this case may be because Italy's contribution is considered under general EU co-financing to GFCM and Italy is a partner in GFCM's MedSea4Fish programme which is funded separately.

4.4.5. Stakeholder engagement and partnerships

Finding 4.16: A project Stakeholder Engagement Plan (SEP) was prepared at the design stage and is well aligned with relevant frameworks, but this was not expanded with necessary detail at inception and remains largely descriptive and insufficiently operationalized.

Finding 4.17: The project created multiple opportunities for stakeholder engagement, although this has been uneven across countries and stakeholder groups (for instance, there has been limited involvement of NGOs, women's groups, and the private sector), and stakeholder engagement has remained largely activity-driven rather than strategic. There was a mixed/limited involvement of key partners and stakeholders at the design stage leading to poor ownership and lack of understanding and expectations. However, GFCM, UNEP/MAP and SPA/RAC all have well established relationships with key project partners which has supported project execution.

Finding 4.18: Coordination between the project's fisheries and environmental National Focal Points (NFPs) has varied significantly between countries but has remained limited and largely ad hoc.

(i) Stakeholder Engagement Plan

220. An outline Stakeholder Engagement Plan (SEP) was developed during the design phase, which was intended to guide engagement with actors relevant for the management of fisheries and the marine environment in the Mediterranean. The SEP aligns with key policy frameworks, including FAO and UNEP's Human Rights-Based Approach (HRBA) and its PANTHER principles (Participation, Accountability, Non-discrimination, Transparency, Human dignity, Empowerment and Rule of law), the Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries (SSF Guidelines), and the GFCM 2030 Strategy and its Regional Plan of Action for Small-Scale Fisheries in the Mediterranean and the Black Sea (RPOA-SSF). It also reflects UNEP/MAP principles, which emphasize the central role of civil society, the private sector, and other stakeholders in environmental governance, as well as the importance of inclusive and participatory decision-making processes. The SEP identifies a broad range of relevant stakeholder groups, including government administrations, research institutes, fishers and fish workers, NGOs and civil society organizations, private sector actors, and intergovernmental organizations. The plan does acknowledge the often-invisible role of women in fisheries, particularly in post-harvest activities, consistent with the SSF Guidelines' emphasis on gender equality and social inclusion in the fisheries sector³³ but gender considerations are not operationalized through specific actions, targets, or monitoring indicators.

221. However, the SEP remains largely descriptive and insufficiently operational to guide systematic stakeholder engagement during implementation. Although the document identifies broad categories of stakeholders, it does not clearly identify the specific institutions, organizations, or stakeholder groups to be engaged in each country or at regional level. The stakeholder mapping referred to in the document has not been translated into a clear engagement strategy identifying priorities. Engagement approaches are described in generic terms (e.g. workshops, meetings, exchanges) with limited differentiation by stakeholder type, level of influence, or purpose of engagement. The plan also provides limited clarity on how stakeholder inputs feed into fisheries or marine environment management decisions or GFCM and UNEP/MAP and SPA/RAC governance processes. Monitoring indicators mainly track the number of activities and stakeholders engaged rather than the quality, inclusiveness, or influence of engagement. In addition, the SEP is not clearly linked to the Knowledge Management and Communications (KMC) plan. As a result, while the project team (GFCM and UNEP/MAP and SPA/RAC) often has practical knowledge of key actors, stakeholder engagement

³³ FishEBM Mediterranean Stakeholder Engagement Plan. Internal document.

continues to rely largely on ad hoc interactions rather than on a fully operational stakeholder engagement strategy or platform.

(ii) Partnerships - engagement with national institutions

222. The project's key participating national government institutions have been involved in various project activities across countries, but this has varied enormously. In some cases, the project has supported improvements in national data collection and analytical capacity. For example, in Lebanon, the project has contributed to strengthening the capacity of national institutions to collect and analyze fisheries data as part of surveys-at-sea conducted and handled by the National Council for Scientific Research Lebanon (CNRS). Interviews indicate that these generated high-quality and reliable data on fish stocks, providing a strong scientific basis for decision-making within the Directorate of Fisheries. The activity also contributed to significant capacity building, with the Ministry staff improving skills in data collection and species identification, and CNRS teams gaining valuable experience through close collaboration with GFCM experts.³⁴ In other cases, capacity building has supported national fisheries legislation. For example, participation of Tunisian representatives in the workshop on strengthening national legislation in line with GFCM recommendations provided practical insights on reviewing legislation and identifying gaps. Stakeholders reported that the knowledge gained is being used to inform ongoing revisions of fisheries legislation.

223. However, engagement of environmental ministries, principally through their environmental NFPs has been inconsistent and, in some cases, very limited to date. This is largely due to the very delayed start to the UNEP/MAP and SPA/RAC project activities (see X.X), but also a lack of clarity regarding roles and expectations, combined with competing priorities, high workloads, and inter-ministerial coordination challenges, which has reduced the effective involvement of some environmental NFPs in the project up to the MTR.

(iii) Relationship between GFCM and UNEP/MAP and SPA/RAC

224. As mentioned, although there was a previous agreement between GFCM and UNEP/MAP, there was no specific written partnership agreement developed for this specific project. It was assumed that the two partners would work closely together and collaborate on project activities, but coordination between the groups has been limited.

225. It was initially envisaged that a joint work plan with shared budgets would be developed for a sub-set of common activities and there would be regular consultation on activities by each party, especially because many of the SPA/RAC related activities were to include fisheries perspectives.

226. Unfortunately, although there has been contact between the GFCM PMU in Rome and the SPA/RAC team in Tunis and vice versa, the lines of responsibility were unclear and cooperation and collaboration did not happen to any meaningful extent. For instance, the CCA workshop organised by SPA/RAC (under Component 3) only involved GFCM late in planning when the agenda, format and dates had already been decided (even though it involved a fisheries element), and as a result few fisheries sector individuals were able to attend, and the workshop's outcomes are unlikely to be taken up by fisheries agencies (due to low/no ownership). Based on MTR interviews, UNEP/MAP staff did not seem to be aware of this poor collaboration between SPA/RAC and GFCM. Similarly, GFCM was unaware of UNEP/MAP project activities except for those reported to the TPM/PC when the PPRs or annual PIRs

³⁴ Reports from 2024 and 2025 have not yet been published by CNRS, and the reasons for this remain unclear.

were being put together³⁵. The limited communication and coordination between the three key bodies involved – GFCM (Rome), UNEP/MAP (Athens) and SPA/RAC (Tunis) – is probably partly a reflection of a design weakness which has lacked sufficiently detailed coordination mechanisms, consultation procedures or reporting arrangements between the executing partners. The limited visibility of certain activities partly due to broader project governance arrangements affecting all partners rather than being attributed to any single institution.

227. Part of the problem appears to be that UNEP/MAP believed that since SPA/RAC were to carry out much of the UNEP/MAP funded project activities, coordination and collaboration should be between GFCM and SPA/RAC with UNEP/MAP ‘taking a back seat’ - despite being the official executing partner and having overall responsibility for the delivery of the GEF funds provided to UNEP/MAP. However, MTR interviews with SPA/RAC staff indicated that they understood they were managed by and reported to UNEP/MAP and not by GFCM. In other words, as highlighted above, there was confusion among UNEP/MAP and SPA/RAC staff over roles and responsibilities and who was in charge, and the arrangement for collaboration and coordination between UNEP/MAP and GFCM, including management of different elements of the FishEBM Med project was not clear.
228. Unfortunately, cooperation, collaboration, joint planning and exchange between the key parties was not specifically written into the project at the design stage - it was just assumed that this would occur, which did not happen as they operated largely independently and the assumption was clearly an error of judgement at the design stage. With hindsight the arrangement should have been set out formally in an expanded section of the Project Document (and should be for any future FAO/GFCM and UNEP/MAP ventures). The MTR also suggests that a new output and indicator is added to a revised Results Framework that specifically addresses these cooperation and collaboration issues, so that these are formalised, measured and tracked to ensure they occur.
229. Another issue mentioned to the MTR which may have affected collaboration between UNEP/MAP and GFCM was a question over who has the higher responsibility for fisheries management in the Mediterranean. Clearly this rests with GFCM as the Regional Fisheries Management Organisation for the Mediterranean (and Black Sea). However, fish are an integral part of the larger marine ecosystem, and their management needs to be considered in the wider context (and fisheries are addressed under Barcelona Convention), and environmental impacts such as pollution and invasive species (more the remit of UNEP/MAP) will affect fisheries management. Consequently, UNEP-MAP can provide contributions to fisheries management governance.

(iv) Coordination and collaboration between fisheries and environment NFPs

230. The project aimed to promote coordination and collaboration between fisheries and environment administrations on the management of fisheries and the marine environment in the Mediterranean. However, no structured joint activities were planned to foster coordination and collaboration, and engagement remains limited although varies by country. In some cases, most collaboration and exchange between NFPs occurred during annual PSC meetings. In Lebanon, for example, collaboration between environmental and fisheries administrations is weak, reflecting existing institutional fragmentation, duplication of mandates, and competition between ministries. Consequently, project activities were largely implemented separately by each NFP. For instance, apparently only the environmental NFP was invited to the project’s NIS workshop (Output 3.3), while the fisheries counterpart was not. Similarly in Libya and Albania there have been little or no collaboration between the two NFPs, and communication between the two focal points in Tunisia occurs but remains limited,

³⁵ A UNEP/MAP reviewer commented that: ‘the issue should be considered as a two-way communication and coordination challenge rather than a situation in which one partner was systematically informed while the other was not. While coordination between GFCM and UNEP/MAP-SPA/RAC was indeed less structured than originally envisaged, information sharing did take place through PSC meetings, bilateral exchanges, reporting processes and reviews of selected technical outputs.

as each has developed its own vision of project activities. In contrast, Morocco and Montenegro have much closer relations between the fisheries and environmental authorities (even though there have been delays over designation of the environmental NFP for the project), although collaboration has not been extensive to date, in part due to the delays over beginning the SPA/RAC led project activities.

231. Unfortunately, there were limited opportunities built into the project's design to ensure joint actions between the environment and fisheries NFPs and their respective agencies, with 'activity sets were very much divided up between UNEP/MAP and GFCM' during the design period according to one interviewee. Overall, MTR interviews indicated that, while communication channels between NFPs were functional, collaboration under the project has been ad hoc and limited.
232. A related issue which has affected the project (and the FishEBM Black Sea project) is that knowledge of the GEF and GEF processes is generally poor in national fisheries agencies (as opposed to environmental agencies). In such cases it is useful to ensure the national GEF Operational Focal Points, which are usually based within national environmental agencies, are involved in the project. Interviews indicated that they have largely remained disengaged despite consistent efforts to involve them³⁶.

(v) Engagement with local-level stakeholders including SSF and fisher groups

233. Local stakeholder engagement has varied across countries depending on institutional contexts and internal constraints.
234. Small-scale fisheries (SSF) dominate the Mediterranean fisheries sector in terms of employment, providing livelihoods for most fishers in the region. However, they remain underrepresented in revenue generation and policy making, including within the regional GFCM decision-making processes. These communities often face limited access to markets, social services, and alternative livelihood opportunities, making them particularly vulnerable to environmental and economic shocks. Furthermore, participatory processes for engaging community level stakeholders in fisheries management decision-making are uncommon, which has reduced the effectiveness of past fisheries management efforts. Small scale fisher groups are a particular focus for the project by GFCM, which has had relatively little direct contact previously and the project's stakeholder mapping exercise (Output 1.4), is intended to gain a much better understanding of this group for more informed and participatory decision-making at internal GFCM. One of the benefits of the project is that it should enable greater representation of the views and needs of local fisher groups in GFCM decisions on the management of Mediterranean fish stocks which directly affect them, which has not occurred to any extent before (largely through a single national government representative who may or may not have consulted SSF groups).
235. The project has sought to engage small-scale fishers (SSF) primarily through regional knowledge exchange and capacity-building activities, notably under the SSF Forum (Output 1.4), and the collection of socioeconomic data (under Output 1.1), led by GFCM. In Türkiye, for example, stakeholder engagement has been relatively strong, facilitated by existing relationships between fisher associations and national fisheries agencies (Sür-Koop (national fisheries cooperative in Türkiye) supporting stakeholder engagement and national socioeconomic survey in Türkiye). Organizations such as Sur Koop have played an active role in the project's implementation, particularly in the collection of socioeconomic data, awareness-raising, and information exchange. MTR interviews indicated that fisher stakeholder groups have become more receptive to participating in surveys and sharing data, reflecting

³⁶ One GFCM reviewer commented that 'They have always been invited to PSC meetings and invited to provide input to project reports, 'A UNEP/MAP reviewer commented that it 'was not clear where the figure came from'. The figure was communicated during an MTR interview. However, as this was a confidential interview details therefore cannot be provided', very few (if any) ever respond. Only the Libyan GEF OFP has taken a more specific interest in the project, participating (online) in a couple PSC meetings and also holding a dedicated meeting (with the GFCM PTM/PC) mid-way through the project to better understand Libya's activities under the project.'

growing trust and awareness of the benefits of improved fisheries management. In Tunisia, engagement has centred more around participation in project workshops and forums, particularly the SSF Forum and capacity-building activities. These have provided practical support to fishers in addressing emerging challenges. The NIS workshop for instance enabled participants to share firsthand experiences, learn how to manage and valorise NIS, and explore new market opportunities, including through value chain development.³⁷ As noted by an interviewee in Türkiye, engaging in project activities such as the SSF Forum, contributed to a better understanding of the negative effects of NIS, and options for how to address them including development of potential new markets (e.g. for lionfish). Similarly, in Albania, fishers were engaged in the collection and analysis of socioeconomic and local ecological knowledge (LEK) as part of the process to establish the FRA in the southern Adriatic Sea (Output 3.1).

236. The project has also included workshops aimed at strengthening collaboration between scientists and fishers, such as participation in a workshop on the European eel, which contributed to improving dialogue, knowledge sharing, and the dissemination of scientific advice on fisheries management. The Forum also supported the development of regional networks among fishers and promoted the exchange of best practices based on country experiences.³⁸ Direct involvement of local fisher groups has also included the project's gear selectivity testing activities. Several countries have participated in project workshops to date and reported positive experiences of the SSF groups to the MTR, including Lebanon, Türkiye, Morocco and Tunisia. Representation of local fisher groups appears to have been particularly strong in Morocco.
237. On the other hand, stakeholder engagement has been relatively unstructured, with limited systematic involvement of local actors in project design and decision-making processes. For instance, consultation with many stakeholder groups during the project design phase was very limited – even with national agencies - with many interviewees indicating that their involvement was mainly indirect through a national representative. In addition, barriers such as language barriers and availability of translation/interpretation, particularly for Turkish, has limited access to information and the technical complexity of materials and further affected the depth and effectiveness of stakeholder participation.
238. Up to the MTR there had been little opportunity for local groups to engage with the SPA/RAC and UNEP/MAP activities due to the late start of their project activities. Most interaction has occurred in relation to inputs to: (i) various technical reviews by consultants, e.g., review of '*State of waste management practices on fishing vessels in the Mediterranean Sea: Review of common sources, regulatory frameworks, and port waste reception facilities*' (UNEP/MAP-SPA/RAC 2025) where relevant groups were asked to fill in a questionnaire; (ii) attendance at regional workshops such as that on CCA held in Türkiye in December 2025, although the extent of direct inputs from local stakeholder groups is unclear (national government agencies were more directly involved in these workshops; (iii) and initial moves to establish national stakeholder platforms intended to support the development of the proposed 'NAP+' process in some countries (which had not been formerly established with a first meeting by the MTR).

(vi) Private sector engagement

239. Opportunities for direct engagement with larger private sector commercial fisheries have been relatively limited. In the Mediterranean most fisheries are small-scale, multi-species and multi-fleet, and private sector engagement primarily relates to fishers and their organizations rather than large commercial industrial companies. While some commercial actors were indirectly involved in project

³⁷ GFCM. SSF forum workshop on non-indigenous species: from health and safety to marketing opportunities", a capacity building exercise for small-scale fishers from the Mediterranean region.

³⁸ GFCM. Back To Office Report: SSF Forum meeting "Connecting scientists and fishers in the process towards data collection and management of European eel in the Mediterranean – Second Workshop" 27 Feb 2023 - 2 Mar 2023

activities, such as commercial vessels participating in surveys and the provision of fisheries equipment (e.g. VMS and monitoring systems and for gear selectivity trials), private sector engagement has not been a central component of the project, although there are entry points for connection with the project, e.g. through interest in markets for blue crab (an NIS). Unfortunately, it was not possible for the MTR to interview any commercial fisheries operators and stakeholders so the extent to which this group is committed to adopting new practices promoted by the project remains unclear.

(vii) Engagement with European Commission and EU member countries

240. Although many of the countries bordering the Mediterranean Sea are EU member countries and active in its fisheries with concerns about the environmental status of the Sea, the European Commission has not been directly involved in the project, and neither have EU member countries had direct involvement (although indirectly through support for some external multiple partner initiatives that the project has been involved with, such as the Italian fisheries agency support for the surveys to establish the Otranto Channel FRA). The MTR was informed that there was little interest from the European Commission before and immediately after the project started and did not wish to be associated with the project. However, the MTR was unable to interview the relevant person from the Commission to get their views.

4.4.6. Knowledge management and communications – institutional arrangements

Finding 4.19: Knowledge management and communication have been constrained by fragmented institutional arrangements, limited strategic guidance from FAO and UNEP-MAP, and weak project positioning within GFCM, delays over KMC products generated by SPA/RAC, resulting in an insufficiently coordinated KMC approach.

(i) Institutional arrangements for KMC

241. This is the first GEF project to be executed by GFCM whose communication practices have traditionally focused on overall institutional and more ‘programme-level’ KMC activities rather than specifically designed for individual projects. Consequently, understanding and identification of project-specific KMC approaches, means, relevant stakeholders, capacity needs and activities has not been clearly defined, creating challenges in positioning and consistently communicating the FishEBM Mediterranean project aims, results and key messages.

242. While a KMC specialist was recruited by GFCM, implementation of project KMC activities has remained highly dependent on the GFCM institutional communications team, whose members are organized by thematic areas and cover multiple GFCM programmes and lack experience of project-level KMC. This arrangement has resulted in a fragmented approach to KMC, with no single point of leadership. In practice, the KMC specialist has worked closely with the TPM/PC to identify communication priorities but has had to rely on multiple thematic focal points within the communications team for sources of information, stories, etc, for project KMC and dissemination.

243. KMC capacity support for the project has also been limited at UNEP/MAP and SPA/RAC. At SPA/RAC responsibilities have been largely concentrated in a single individual staff member working across multiple projects, which has constrained effective implementation of KMC activities (as noted by interviewees “one person at SPA/RAC, working across multiple projects, is not sufficient”). In addition, SPA/RAC lacks a dedicated budget for FishEBM project communications, further limiting its ability to support visibility and outreach efforts with one SPA/RAC interviewee stressing that “we are doing what we can given the limited resources”.

244. FAO has provided support to align KMC products with corporate communication standards and dissemination of selected materials through FAO platforms (e.g. IUU-related content³⁹) but review of or guidance on KMC activities, materials or products has been limited (apart from technical inputs from the FAO LTO).
245. Institutional support for project KMC by UNEP/MAP has also been limited up to the MTR, and in the MTR's view uncertain and confusing. As mentioned above, up to the MTR the MedProgramme platform had not been properly available to the FishEBM project for distribution of KMC products and guidance on technical KMC issues has not been consistent as the UNEP/MAP Project manager only had Terms of Reference for his involvement in the FishEBM project confirmed in September 2025.
246. Overall, KMC approaches have evolved gradually rather than being clearly defined at inception ("KMC is being built with time"). Although some ad hoc support has been provided through different channels, KMC efforts have remained fragmented and have not constituted a structured or coordinated KMC support framework. As a result, both GFCM and SPA/RAC have sought support elsewhere. For instance, SPA/RAC participated in an IW:Learn workshops on journalism and storytelling, as well as MedProgramme workshops on constructive journalism.

4.4.7. M&E design and implementation

Finding 4.20: The project has followed the standard FAO-GEF M&E framework, but a specific project M&E-related Output is missing from its Results Framework.

Finding 4.21: The project's M&E framework suffers from a complex and poorly designed Results Framework with a set of confusingly worded outcomes and outputs, and many non-SMART indicators, and associated targets (see above). This has constrained effective monitoring of the project's performance and impacts, particularly at the outcome level. Unfortunately, there was no review and revision of the Results Framework and its indicator set at inception.

Finding 4.22: Reporting on project progress has occurred on time mostly through the PIRs and PPRs and resources for M&E up to the MTR point have been sufficient, although again with reporting focused on activities and outputs rather than able to demonstrate changes/impacts created through the project, and there has been no structured, rigorous lesson learning to date as part of M&E implementation. GFCM coordinates the reporting for the annual PIRs and PPR reports but there have been delays in providing information to GFCM from UNEP/MAP and SPA/RAC.

Finding 4.23: M&E implementation by GFCM has been generally adequate, with regular reporting and strengthened monitoring systems. However, SPA/RAC has more limited M&E capacity which has affected the accuracy, frequency and quality of their reporting.

(i) M&E framework design

247. The project's M&E framework is significantly constrained by weaknesses in the design of its Results Framework. As mentioned above, the project's design is complex with poorly formulated project objectives and outcomes, and an associated set of largely non-SMART⁴⁰ indicators that largely monitor outputs rather than outcomes. As no revisions were made during the inception phase, the project has continued to rely on a framework that, in the MTR's view, is not fit for purpose and should be revised. As a result, reporting has focused primarily on activities and outputs, while the extent to which the project has contributed to meaningful changes or results (e.g., changes in behaviour and practices of key stakeholder groups, endorsement of national policies and plans, adoption of new approaches and

³⁹ <https://www.fao.org/gfcm/news/detail/en/c/1730406/>

⁴⁰ Specific, Measurable, Achievable, Realistic, Time-bound

technologies), remains difficult to assess. In some cases, reported results cannot be demonstrated due to a lack of clear, measurable indicators.

(ii) M&E implementation and reporting

248. The project has followed the standard FAO–GEF M&E framework. The main sources of information to support the M&E have been the project inception report, FAO Project Progress Reports (PPRs), annual GEF Project Implementation Reports (PIs), results-based annual work plan and budget, back to office reports of site visits and missions and technical studies and reports, and in the case of SPA/RAC additional quarterly Project Cooperation Agreement (PCA) reports to UNEP/MAP (although the MTR heard contradictory statements that these had yet to be produced).

249. GFCM has ensured regular reporting and adequate human and financial resources allocated to M&E. A dedicated internal project monitoring system was introduced early on in project implementation, improving the tracking of financial, budgetary, and activity-level progress, through internally developed tools (dashboards) and additional staffing dedicated to the task. However, reporting in some areas (e.g. gender and stakeholder engagement) remains weak, and some project implementation reports lack sufficient detail or accuracy.

250. In contrast, M&E and reporting capacity and resources at SPA/RAC and UNEP/MAP is more limited, where it is largely reliant on time-pressed project staff and older reporting systems provided through UNEP/MAP (e.g., financial data management system). MTR interviews also identified a lack of clarity and agreement regarding roles and reporting lines between SPA/RAC and GFCM, and UNEP/MAP and SPA/RAC which need to be clarified urgently. This has resulted in gaps in information sharing and coordination on monitoring and reporting, and affected the accuracy, frequency and quality of monitoring and reporting. For instance, GFCM is not always fully aware of activities implemented by SPA/RAC or UNEP/MAP, and UNEP/MAP is not always aware of what activities SPA/RAC has undertaken in the previous months.

The overall rating for factors affecting performance is **Moderately Satisfactory**.

4.5. Sustainability and replication and catalysis

Key MTR question 5 – What is the likelihood that the project results will be useful or persist after the end of the project?

Finding 5.1: It is difficult to judge the likelihood of sustainability at the MTR point as many GFCM project activities are still on-going but the presence of strong partnerships is encouraging and if dissemination and mainstreaming of key messages and knowledge products (lessons learned, best practices, guidelines, recommendations, policy guidance, etc.) can be strengthened then the likelihood of sustainability will be improved.

Finding 5.2: In the case of SPA/RAC and UNEP/MAP led activities, SPA/RAC has only recently begun some of its activities, e.g. those addressing the ‘NAP+’ and whether results will be achieved before the official end of the project (December 2026) and the sustainability of those results is highly questionable.

Finding 5.3: There are several potential risks to sustainability of project results: institutional and financial (small budget limiting project activities, especially for SPA/RAC and there is yet no clear source of funding to continue key project activities). There are also potential socio-political risks (changes in global political arena) to project results becoming embedded.

Finding 5.4: At the MTR there was no clear sustainability plan, and no significant replication or catalysis has been demonstrated (there has been potential influence through meetings although it is difficult to assess). Routes for dissemination and scaling up (lessons, best practices, etc) have not yet been properly explored.

(i) Sustainability and replication and catalysis

251. At the MTR point it is difficult to judge the likelihood of sustainability of results generated by the project continuing beyond the GEF funding as many activities are still on-going, especially those for which SPA/RAC and UNEP/MAP have responsibility. Relatively little attention has been paid to sustainability issues to date, and a sustainability plan as not yet been developed (sustainability issues are only marginally addressed in the Project Document), although this is not unusual at the MTR point.
252. However, most controllable risks to sustainability are likely to be addressed before the end of the project, at least for those activities led by GFCM (less certain for SPA/RAC). For instance, if dissemination and mainstreaming of key messages and knowledge products (lessons learned, best practices, guidelines, recommendations, policy guidance, etc.) can be achieved and integrated into partner and wider stakeholder processes there is a good chance that results will outlive the project. Some project products are likely to be more sustainable than others, including the updating of GFCM's legal database (GFCM Lex) with the integration of information on the national status of fisheries policy and regulations in the 9 countries, as well as production of the IW:Learn Experience Notes which will be distributed through the IW:Learn website, and other KMC material which is likely to continue to be available through the GFCM, UNEP/MAP, SPA/RAC and FAO and UNEP websites. Some project activities will require a short extension to increase the likelihood of their sustainability of their results and the processes and systems put in place by the project, particularly those led by SPA/RAC such as the NAP+ activities in Montenegro.
253. *Financial:* The current relatively small project budget, especially for SPA/RAC and UNEP/MAP, poses a risk to effectiveness and impact of the project results as it limits scale of activities. Some of the more expensive project activities such as the at-sea-surveys (which also rely on in-kind contributions from fishing vessels which also poses a risk as it cannot be guaranteed), will need agreement and future (non GEF) funding to ensure future essential data collection that can inform fisheries management but at present it is unclear what the source(s) would be (no government MTR interviewee mentioned this).
254. *Institutional:* there is a potential risk to project results from reduced future institutional support due to government resources being directed elsewhere. GFCM will continue to provide support to the nine countries, but this will depend on future funding. However, one of the advantages of using GFCM as the executing partner is the binding requirements of its membership - once a Recommendation is adopted by the Commission it must be transposed into national legislation by the member countries which supports sustainability. Similarly, if parties to the Barcelona Convention adopt a priority action it will be incorporated into the MedProgramme and support should be given to individual countries.
255. However, given that SPA/RAC largely operates on a project basis using project funds to employ and allocate staff and other resources, MTR interviewees were unsure whether project results generated by SPA/RAC could be continued beyond the GEF project, and although UNEP/MAP has a focus on blue economy in its most recent regional strategy on sustainable development⁴¹ it is also unclear whether it will continue to support SPA/RAC efforts to promote integration of fisheries into NAPs+ (blue economy strategies, or their equivalent national policies and plans) especially as fisheries is the remit of GFCM beyond the project.

⁴¹ <https://wedocs.unep.org/rest/api/core/bitstreams/85ca5407-b7ad-4451-834f-464de306846e/content>, and more generally UNEP has a focus on blue economy under its Regional Sea Programme - <https://www.unep.org/topics/ocean-seas-and-coasts/regional-seas-programme/sustainable-blue-economy>

256. *Socio-political*: there has been a significant recent reduction in the engagement of some countries in the global development and environment agendas, with realigned priorities and reduced funding, including in relation to ocean governance. The European Union countries for instance are increasing public funds for defence, with national budgets for environment and fisheries likely to be affected. This may mean less investment through the EU countries of the Mediterranean in the region.

257. At the MTR point (3 years into the 4-year project) the project had not developed a sustainability and exit plan. This needs to be addressed in next 3-4 months as the NTE is Dec 2026. The plan needs to particularly consider how to fund long-term programmes e.g., data collection (will countries pay for this) to ensure that the systems and processes and momentum the project has generated towards encouraging and supporting the target countries to move to more sustainable fisheries is maintained for the long term.

(ii) Replication/scaling up and catalysis

258. At the MTR point there had been no significant replication or catalysis. There has been potential outscaling through meetings although it is difficult to assess. For instance, while there have been a significant number of presentations on project aims and results at global and regional events and publications on global platforms such as IW:Learn by GFCM, UNEP/MAP and SPA/RAC, and UNEP/MAP has promoted the FishEBM MED project at meetings of its other MedProgramme projects and by GFCM at MedSea4Fish events, there is no strong evidence of replication or catalysis of project results yet. Routes for dissemination and scaling up (lessons, best practices, etc) have not yet been properly explored and indeed the initial KMC Plan did not identify a clear strategy for replication or catalysis or specific targets. Replication and catalysis could initially be supported if the FishEBM Mediterranean and Black Sea projects held a joint knowledge sharing and lessons learning meeting.

The overall rating for Sustainability is **Moderately Likely** and for replication and catalysis **Moderately Satisfactory** (for the MTR stage)

4.6. Cross-cutting issues, equity (gender, youth, vulnerable groups) and environmental and social safeguards

Key MTR question 6 – To what extent are gender equality and empowerment and other equity issues mainstreamed in the project, both in design and implementation (including M&E)? To what extent are environmental and social concerns taken into consideration in the design and implementation of the project?

Finding 6.1: Gender was considered at the project design stage. However, the gender analysis and the project's Gender Action Plan (GAP) remained largely conceptual and had little influence on the design of project activities, resulting in limited integration of gender considerations in the project.

Findings 6.2: The GAP was not further developed at project inception and remains insufficiently operationalized. The project has few targeted actions to provide gender benefits and specific gender activities has not been systematically developed and mainstreamed in the project.

Finding 6.3: Institutional capacity to develop and promote gender-related activities has been limited, with gender expertise and responsibilities largely resting with the TPM/PC (as the gender focal point for GFCM) for the GFCM-led activities, and, until recently, for SPA/RAC resting with the whole project team (which lacks a designated gender focal point, and the UNEP/MAP gender focal point had been little involved up to the MTR). The lack of dedicated gender expertise has constrained systematic gender mainstreaming across project components.

4.6.1 Gender

(i) Gender design

259. Outline gender considerations were included at the design stage based on a gender analysis (literature review, largely reliant on secondary data and analysis of broader rural/agricultural contexts, with limited fisheries-specific evidence) and a brief Gender Action Plan (GAP) outlined in the main part of the Project Document (not the usual separate, more developed GAP as an annex). However, these elements were not sufficiently developed into a clear and operational gender strategy and plan of activities from project inception. The proposed actions in the GAP for each component were not translated into concrete, operational activities, resulting in very limited integration of gender considerations across the project. For instance, the project has largely lacked defined gender indicators and targets, clear gender-relevant responsibilities, and a dedicated budget for gender activities required to effectively guide gender integration. However, some actions were partially taken forward, such as the integration of gender considerations in socio-economic data collection, value chain analysis, and support to SSF organizations.

(ii) Limited integration of gender in implementation

260. While the project acknowledges that fisheries in the Mediterranean are male-dominated, gender considerations have not been systematically integrated into the project, and the project has created limited targeted opportunities to actively engage women. Women's involvement in fisheries in the Mediterranean is marginal and largely informal (e.g., in post-harvest processing, distribution, marketing and sales, manufacture and repair of fishing gear), but these were not targeted under the FishEBM project.

261. Women's participation in the management of the wider marine environment issues, such as biodiversity, is greater but even the UNEP/MAP and SPA/RAC element of the project lacks focus on gender. This was confirmed by the MTR by both fishery and environment NFPs stating that gender considerations were largely absent from the project (one interviewee even stated that "women's inclusion is not a priority"), although women are relatively well represented at the level of the administration and as project NFPs, and both the GFCM and SPA/RAC teams have a high proportion of women, including the most senior position, that of the TPM/PC.

262. However, there have been a small number of project activities which have sought to provide benefits to women. These include the inclusion of women in the NIS workshop, and it was reported to the MTR that those participating later applied knowledge on NIS (e.g., blue crab valorisation), organized training sessions for women, and promoted more sustainable fishing practices within their communities. One interviewee reported being inspired by a woman restaurateur who demonstrated how NIS (e.g. blue crab) can be used in food recipes, and this experience encouraged her to experiment in her own restaurant. The project has also addressed gender issues less directly through its socio-economic surveys under Output 1.1 (although it is unclear to what extent this data is used to inform gender-responsive programming in fisheries management), and on value chain analysis and stakeholder engagement processes. Unfortunately, a key activity set proposed by the project which would have directly benefited women – Output 1.5: Participation in the regional network of SSF platforms reinforced in order to provide social protection support to its members – has been poorly delivered by the project and not led to any noticeably increased social protection for women in target countries.

(iii) Limited institutional capacity and absent coordination between GFCM and SPA/RAC

263. There is little coordinated or joint project work between GFCM and SPA/RAC on gender-related aspects. Institutional support for gender has been constrained on both sides: within GFCM,

responsibility has largely rested with the TPM/PC, with no dedicated gender expertise available and FAO did not provide specific gender support to GFCM; and SPA/RAC does not have a designated gender focal point for the project or specific gender expertise in house, and the UNEP/MAP gender focal point was not aware of the project and had not been actively engaged with it at the MTR point. This probably partly explains the absence of a structured and proactive approach on gender.

4.6.2 Environmental and social safeguards

264. The project was rated as 'low' risk during the design phase. As a result, no Environmental and Social Risk Analysis and Environmental and Social Management Plan was attached to the Project Document. There have been no significant changes to either the design or operation of the project since it was approved by the GEF, consequently in the MTR view, the risk rating remains 'low'.

The overall rating for gender is **Moderately Unsatisfactory**, and for Environmental and Social Safeguards is **Satisfactory**.

5. Conclusions and recommendations

5.1. Conclusions

265. **Conclusion 1 - Relevance.** The project is highly relevant, helping to meet regional (GFCM, SPA/RAC and UNEP-MAP priorities) and global priorities (GEF IW and FAO priorities), and particularly important in helping to meet GFCM's objectives for the achieving sustainable fisheries in the Mediterranean Sea). However, there is mixed relevance among countries with some elements more important than others and varying by country, e.g., for addressing data gaps nationally (socio-economic - Lebanon), trawl selectivity trials (Tunisia), stock assessments (Lebanon), and SSF workshops on NIS (Morocco), reflecting country context and needs. Considered more relevant for fisheries than its environment aspects. Ownership of the project was not initially as high as it should have been due to limited engagement during the design phase but has improved, again, especially for fisheries-related GFCM-led aspects of the project; it is less easy to judge for the UNEP/MAP and SPA/RAC led elements of the project.

266. **Conclusion 2 - Effectiveness – Delivery of project outputs.** Overall, mixed progress at mid-term. Under Component 1, there has been some useful collection of socio-economic data and good progress in building a "data culture" and capacity to collect and analyse biological and gender disaggregated socio-economic data among the countries. However, it is unclear to what extent socio-economic information has been used by, or can be integrated into, current fisheries management decision processes (either regionally or nationally) by the end of the project, and the stakeholder mapping information is not yet complete and platform not fully populated so has also not yet fed into fisheries decision making, and its practical use unclear to participating countries. The planned capacity needs assessments for SSF organizations have not been conducted, and training delivered to date has not been based on a systematic analysis of needs. There have also been some delays over reaching agreement on regionally harmonized approaches, e.g. value chain and IUU assessment methodologies, but the new approaches should be piloted before the end of the project, although these project elements will not be completed as proposed at the design stage and the associated activities and targets should be reviewed and revised. The budget for the project's value chain activities was not enough to properly deliver this element of the project, especially given the target of developing value chains for at least 7 fisheries (experience shows that developing fisheries value chains is time-consuming, requires significant commitment and requires substantial budgets if these are to be

successful and sustainable). In addition, GFCM does not have strong expertise in this area (although FAO NFI does) this so there is a question over why this element was included in project. It would be more appropriate as a dedicated follow-up project. Other Component 1 related activities, including certification and fish handling training and product development have also not been delivered, are of lower priority (and there are insufficient resources) and should be cut.

267. Some of the project activities to address IUU fishing (under Component 2) have not been implementable due to the lack of an agreed methodology for collecting IUU related data. However, the updating and expansion of information on national legal frameworks, particularly information relevant to IUU fishing, and its uploading to the GFCM-Lex database has been an important contribution by the project. There has also been very good progress on the introduction of VMS systems in Montenegro and Albania, and support for upgrading and expansion of the VMS system in Türkiye, but in MTR's view these are unlikely to be complete before the end of the project and would benefit from a 3-4-month No Cost Extension to ensure their full operationalisation. In addition, at least one NPOA-IUU is likely to be formerly approved before the end of the project (probably for Albania but also possibly for Türkiye).
268. Component 3 is considered the least coherent of the five project Components by MTR interviewees and has had mixed success on delivering its outputs. The project has provided significant and important support towards the establishment of a new FRA in the Adriatic Sea (Otranto Channel) which represents a contribution to 30x30 target, including an important stakeholder engagement process, but there have been no project activities in officially designed MPAs as envisaged at the design stage. There has been some interesting and innovative work to pilot the use of eDNA metabarcoding approach to identify vulnerable species in marine systems, but the output addressing monitoring of good environmental status (Output 3.2) has many activities which address a wide range of issues but do not form a coherent whole, and it is unclear what the likely use and impacts of some results will be (for instance, the outputs of the Climate Change Adaptation (CCA) workshop). Because many of the activities associated with this Component are led by SPA/RAC whose project activities only began 15-18 months after official start of the project, many results have been delayed and can probably not be delivered without an NCE.
269. The focus of Component 4 was to be largely on greater promotion of fisheries within the blue economy of the Mediterranean through the development of National Action Plans (NAP) for implementing the SAP that better integrated fisheries into existing NAPs - creating a 'NAP+'. However, there has been confusion and a lack of understanding and ownership among stakeholders over the nature and scope of these Plans, largely due to a poor design and confusing presentation in the PIF and Project Document, and none had been developed by the MTR point (there was also delays as this element is led by SPA/RAC). Initial discussions had begun in Montenegro, but it is unclear what the scope of the work would be, and how much can be achieved by the end of the project given that the project calls for the adoption by Government of a NAP+ with an associated funded investment plan, and with the NAP+ under implementation. An alternative approach, where the project provides guidance on the benefits of sustainable fisheries for the blue economy which could be integrated into existing national blue economy planning processes in Tunisia, Morocco and Libya, may be a more effective use of project resources, and offers a 'quick win'.
270. The KMC elements of project (under Component 5) have been underdeveloped with only an outline KMC Plan produced (not linked to the Stakeholder Engagement Plan) and not been sufficiently operationalized, and no clear management of KMC activities. Despite GFCM and SPA/RAC producing some good knowledge products and undertaking awareness-raising activities with positive results at the national level, communication of key project messages and the overall narrative for the project has not been as successful as it should have been. This has led to poor project visibility and a weak identity, with confusion with other GFCM and UNEP/MAP initiatives, and generally, KMC efforts remain at an

early stage and are not yet fully systematic. Development, coordination and implementation of KMC activities and products have been largely conducted independently by UNEP/MAP, SPA/RAC and GFCM.

271. **Conclusion 3 - Effectiveness – progress towards outcomes and project objective.** The poorly formulated project objective and outcome statements and associated indicators (not SMART) make assessment of real achievement problematic. In addition, for the first indicator – *Marine Protected Areas created or under improved management for conservation and sustainable use* – has been wrongly reported on as the project does not have any activities seeking to improve management in MPAs and therefore previous reported figures needs to be discounted from future PIRs and PPRs. Nevertheless, the end-of-project target (125,845ha) has been exceeded (270,200ha) by considering the project's contribution to establishment of an FRA in the Otranto Channel. The mid-term target for the second indicator - *Globally over-exploited marine fisheries moved to more sustainable levels (metric tons)* – has been achieved (142,180 tonnes of landings from fisheries under sustainable management) but the end-of-project target (238,000 tonnes) is considered too ambitious given the natural fluctuations in fish stocks and should be recalculated.
272. In terms of the extent of achievement of Outcome 1, although good data collection to date, it is not clear to what extent this information has been used or how it will be integrated into current management decision processes by the end of the project, so the outcome – *'Managers and stakeholders use sound information generated on the status of key commercial fisheries to support improved management and selected value chain interventions'* is not yet being met (and unlikely to be reached before end of project. Nevertheless, there has been progress in strengthening national capacity and building a "data culture" to collect and analyse biological and gender disaggregated socio-economic data, particularly in countries where such systems were previously weak, and the stakeholder data collected will help identify and better involve fisher groups in future data collection and decision-making at GFCM. However, the project's value chain aims have not been adequately addressed and would probably have been better treated as a separate, dedicated project.
273. Progress on Outcome 2 – *'Fisheries management better accounts for the quantity and magnitude of IUU fishing in the Mediterranean Sea and incorporates control measures, including through the use of emerging technologies'* – has also been limited as information on IUU fishing (economic cost and extent and impact on IUU fishing) has not yet been collected by project. However, agreement on methodology has been reached and a trial of the new approach will take place in 2026. The most significant contributions to achieving this outcome to date have been improved information and guidance on legal frameworks addressing IUU (updated regional GFCM-Lex database) although national legislations have yet to fully reflect this (and only one NPOA-IUU likely by end of project, and, from a practical point of view, project efforts to increase adoption of, or further support for, VMS system in Montenegro, Albania and Türkiye.
274. Assessment of Outcome 3 is more problematic. It is difficult to measure progress on achievement of Outcome 3 – *'Healthier marine ecosystems with more productive fisheries in place, through the synergistic application of ecosystem-based conservation/ management tools and improvements in fisheries tenure governance'* - given the poor formulation of the outcome (and associated set of indicators). However, project support which was essential for the creation of the FRA Otranto Channel has been important. Other activities under this Outcome, such as integration of incidentally caught vulnerable species into IMAF based national monitoring plans of the Good Environmental Status of marine waters and marine ecosystem, and project activities to address fisheries tenure do not represent a significant contribution towards achieving the Outcome (as it is stated). In addition, although a CCA-themed workshop has been held it is debatable whether CCA can be viewed as a regular 'ecosystem-based management tool'. Overall, the extent to which project activities have

contributed to the outcome statement of a 'healthier marine ecosystems' is debatable (reflecting the poor formulation of this outcome).

275. Progress on achieving Outcome 4 – *'Blue economy at the regional and country level promoted through the identification of existing hurdles via a concerted approach among relevant stakeholders'* – has similarly been limited as no NAP+ has been developed with no associated investment by the MTR, and there was considerable confusion over what was intended. However, there are opportunities to develop guidance to better promote sustainable fisheries within existing blue economy processes in Tunisia, Libya and Morocco which have begun to be explored and to at least begin preparatory work on the NAP+ process in Montenegro although little is likely to be achieved before the end of the project.
276. In terms of progress on Outcome 5 - *Integrated pathways conducive of conservation and sustainable management promoted at the regional and global level* – the project has developed and promoted knowledge management products and communication pieces which have been distributed at national, regional and global levels. However, these remain limited in scope, and their uptake, integration and use are not well documented and KMC products do not really identify and highlight the *'Integrated pathways'* as the project has not been designed and delivered with a strong 'integrative' approach.
277. **Conclusion 4 - Efficiency.** Overall efficiency has been mixed, with both positive and negative factors contributing to efficient delivery of the project. Efficiency, judged on delivery of project activities and results and spending of GEF funds, has been greater for GFCM than UNEP/MAP and SPA/RAC activities. Choosing GFCM as the executing body for the project with its well-established relationships with the fisheries agencies in the participating countries certainly supported project delivery, as did GFCM's status as an Article 14 FAO body. The advantage of contracting SPA/RAC to undertake most of the activities on behalf of UNEP/MAP is less clear (as opposed to UNEP/MAP undertaking the activities itself), as it has limited capacity and a focus on biodiversity, environmental monitoring and MPAs which are not substantial areas for the project, although SPA/RAC does have good relationships with national environmental agencies. The addition of a specific project monitoring and tracking dashboard system and two additional staff members by GFCM, following an early review of progress, has helped support GFCM project operations and was a sensible decision. However, several issues created delays, including a confused weak project design, especially Components 3 and 4, which made interpreting the project a challenge, and force majeure in Lebanon which caused the project to be on hold for a year in the country.
278. **Conclusion 5 - Sustainability and replication and catalysis.** It is considered too early to make a clear judgement on the sustainability of the project's results, but most controllable risks are likely to be addressed before the end of the project. Both GFCM and UNEP/MAP have long-term institutional commitments to the goals of the project and will continue to support participating countries (depending on funding), and, at least for fisheries, the national governments see value in maintaining the project results. If key messages and knowledge products (lessons learned, best practices, guidelines, etc.) can be effectively disseminated and mainstreamed into partner and wider stakeholder processes there is a good chance results will outlive the project. However, there has been little focus on scaling up or catalysis of project activities or results which needs to be addressed.
279. **Conclusion 6 - Factors affecting performance - design and readiness.** The project's design and framework, as captured in its Results Framework, is complex, lacks coherence, and was poorly designed which has made the execution of project activities challenging and, in some cases, handicapped the interpretation and communication of the aims and results of the project. The formulation of the project objective, outcome statements and the outcome indicators and especially Components 3 and 4 is particularly weak and confused, and some activity sets were not priorities of the participating countries but 'wishes' of external stakeholders. As a result, parts of the project can be characterised as a 'Christmas tree project' and some activities 'interpreted' as meaning, intention,

ownership and priority were unclear. This was probably largely the result of a lack of clear leadership during the design phase, and limited opportunities to meet with stakeholders due to COVID restrictions, and no revision at inception, so the Results Framework remained unchanged. This has meant the project has not been as coherent as it could have been and has hindered understanding and communication of the project among stakeholders. The 'readiness' to start implementation presented a challenge at national level due to confusion over project aims, recovery from COVID which affected some countries more than others, and inexperience of GFCM with GEF projects at start of the project.

280. Conclusion 7 - Factors affecting performance - Project implementation and oversight. Overall, FAO in its role as the GEF IA has provided good operational support to the project, particularly by the LTO, but oversight and managerial and technical support provided by UNEP/MAP to SPA/RAC has been limited and should be increased, with responsibilities and reporting lines unclear at times which need to be better clarified and documented. FAO and UNEP, as the two GEF IAs, appeared to have allowed GFCM and SPA/RAC and UNEP/MAP to largely operate independently - at the MTR point, the project can be characterised as two essentially separate projects with little alignment – a larger fisheries management project led by GFCM and a (separate) marine environment management, with fisheries elements independent of GFCM or FAO, led by UNEP/MAP and SPA/RAC. Unfortunately, the PSC, as the project's ultimate oversight body, does not appear to have questioned whether the intended overall integrated approach of the project was being delivered, and has been unable to bring the UNEP/MAP and SPA/RAC and GFCM groups closer together into a more unified project.

281. Conclusion 8 - Factors affecting performance - Project management and execution. Despite a slow start, the capable GFCM team have done a good job in delivering the project up to the mid-term point aided by availability of high quality technical GFCM staff and the introduction of a dedicated project management system and employed two additional staff to support operations and speed up delivery, monitoring and reporting. However, the SPA/RAC and UNEP/MAP teams have been less successful with delivery, largely because of delays on starting their project activities due to late signing of the ICA between UNEP (NBO) and UNEP/MAP (Athens) and between UNEP/MAP and SPA/RAC, although SPA/RAC has made attempts to catch up by allocating more staffing resources and utilising consultants to deliver many activities. Although the SPA/RAC team is very experienced and capable, it is unlikely they will be able to complete some major activities before project end, e.g., NAP+, due to the short time left and SPA/RAC and UNEP will need to revise and reduce its activities even with the option of a No Cost Extension (NCE). There has also been a lack of clarity over roles and responsibilities in the UNEP/MAP and SPA/RAC teams which needs to be resolved, and the support from UNEP/MAP has been inadequate at times and needs to be improved.

282. Consultation and coordination between UNEP/MAP and SPA/RAC and GFCM on project activities has been very limited and the project does not 'showcase the GFCM/MAP approach' that was intended to be promoted in the Project Document. Unfortunately, the project design did not have an adequate structure for coordination and reporting between UNEP/MAP, SPA/RAC and GFCM, and few common activity sets (some limited coordination on KMC) which did not encourage collaboration.

283. Conclusion 9 - Factors affecting performance - Financial management and co-financing. There have been no significant issues with financial management, with levels of actual and committed expenditure high for the mid-term point (combined 75.8%), although this was only 18.27% after the first two years due to delays on the GEF funding being unavailable to UNEP/MAP and SPA/RAC to begin activities until the ICA and PCA were signed. Delivery of co-financing is difficult to assess as it has not been fully captured, but there has been some significant additional 'leveraged' co-financing sources which were not identified as potential co-financiers at the design stage, so the true picture on co-financing is not clear.

284. Conclusion 10 - Factors affecting performance - Partnerships and Stakeholders. The A basic Stakeholder Engagement Plan (SEP) was developed at the PPG stage but unfortunately not expanded

at inception, not linked to the project's KMC Plan, and has not been sufficiently operationalized since and should be addressed. However, the project has created valuable opportunities for stakeholder participation.

285. National institutions have been actively involved in project activities, with positive contributions to data collection and revision of national legislation and engagement of SSF has also been notable, through socio-economic surveys, the SSF Forum, and awareness-raising activities. However, private sector engagement has been minimal, largely confined to the indirect involvement of commercial vessels in surveys and the direct participation of fishers through cooperatives, but without a structured approach. Engagement of environment NFPs has been inconsistent, and coordination between the fisheries and environment NFPs has remained largely ad hoc, with joint activities limited mainly to PSC meetings. Overall, stakeholder engagement has remained largely activity-driven rather than strategic (due to lack of well-developed and operationalised SEP).

286. The project aimed to 'bring together fisheries and environment sectors' to work together more closely in the Mediterranean but the 'common ownership' of project has not occurred at neither national nor regional levels.

287. **Conclusion 11 - Communications/knowledge management.** GFCM had limited prior experience in managing project-specific KMC alongside its institutional-level communication practices which has presented a challenge for its KMC activities. The project's unclear positioning within the GFCM portfolio has diluted its identity and weakened the coherence of the project's communication and stakeholder engagement efforts. Unfortunately, insufficient attention was given to communication of key messages at inception and the project's KMC Plan was only minimally revised and not sufficiently developed with sufficient detail to communicate a common understanding of aims and results of project to stakeholders. Within SPA/RAC, KMC capacity for the project has been concentrated in a single individual covering multiple projects, with no dedicated budget for communications, which again has limited the effectiveness of the project's KMC efforts. Having both UNEP/MAP and SPA/RAC and GFCM operating largely independently of each other has further undermined the coherence and effectiveness of the project. It is clear from interviews with the GFCM, UNEP/MAP, SPA/RAC project teams and key stakeholders that much greater attention needs to be given to KMC within the project.

288. **Conclusion 12 - Factors affecting performance - M&E.** M&E implementation has been generally adequate but the project's M&E has been handicapped by a confusing Results Framework with poorly formulated outcomes and associated non-SMART indicators, which were not revised at inception. The project has undertaken regular reporting and strengthened its internal project monitoring systems (both GFCM and SPA/RAC). However, reporting has focused on activities and outputs rather than outcomes and impacts, and coverage of cross-cutting issues, such as gender and stakeholder engagement, remains weak. M&E and reporting capacity at SPA/RAC is more limited than at GFCM, which has affected the consistency and coordination of reporting with GFCM as well as UNEP/MAP.

289. **Conclusion 13 - Cross-cutting concerns.** Although gender was considered at design stage and some gender-disaggregated data has been collected, gender has not been systematically mainstreamed in implementation by either GFCM or SPA/RAC. The outline Gender Action Plan in the Project Document has not sufficiently operationalized and no dedicated gender expertise has been in place. The UNEP/MAP gender focal point was not engaged, and FAO provided limited specific support. As a result, targeted gender-responsive actions have been limited and there have been few direct benefits to women through project activities as most are technical in nature. Overall, gender has been poorly sufficiently considered by the project.

290. **Overall conclusion** - the project has made mixed progress towards its objective '*to reverse the over-exploitation of select commercial living marine resources by enhancing the capacity of Mediterranean countries to manage fisheries, including through the application of the ecosystem-based management*

tools, in their blue economy development pathway’, and **the overall rating at the MTR point is Moderately Satisfactory**. For breakdown of ratings of individual components and evaluation criteria see Annex 8. However, progress is likely to accelerate over next 10-11 months, although the project needs streamlining and some adjustments to improve project delivery, the likelihood of project impact and sustainability of project results. Some elements will need to be extended to be completed (especially SPA/RAC activities).

5.2. Recommended actions

Recommendation 1: Streamlining, rationalising and consolidating project technical elements

General (applies to overall project)

- Cut or reduce activity sets which are of lower priority and refocus on those likely to contribute most to overall aims of project and have most impacts and consider reducing some indicator targets to make the aims of the project more realistic. Suggestions are to: (i) cut the value chain target from 7 to 2 (functional and sustainability analyses as part of two pilot studies may yet be possible before the formal end of the project but it will not be possible to upgrade and/or develop new value chains); (ii) cut certification and fish handling activities, baseline studies on NIS/IAS and their impacts, activities involving ‘Investment plans’, national IUU data collection, and the SAPBIO stakeholder platform; (iii) minimise further work on social protection, marine litter, CCA; (iv) rethink NAP+/Blue Economy activities (see below). *Responsibility: GFCM, SPA/RAC, UNEP/MAP with endorsement by PSC members. Timescale: May – July 2026.*
- Following the recommended review of the above suggested activity sets, reformulate/rearrange relevant project outputs and activities in Results Framework, project workplan and budget and discuss and obtain endorsement at 2026 PSC. *Responsibility: GFCM, SPA/RAC, UNEP/MAP with endorsement by PSC members. Timescale: May – July 2026.*

Component 1

- Clarify to stakeholders how socio-economic data collected by project will be used in fisheries management decision-making - feedback to those who provided data. *Responsibility: GFCM. Timescale: May – June 2026.*
- Undertake joint lesson learning workshop with FishEBM Black Sea project on the collection of (i) socio-economic and (ii) stakeholder mapping data, especially as GFCM has little experience of direct interaction at local level. *Responsibility: GFCM. Timescale: October-November 2026.*

Component 2

- Consider piloting revised IUU approach in 1-2 areas before end of project (NCE if needed) with a plan that clearly identifies targets and deliverables (so how far to go with this activity) *Responsibility: GFCM. Timescale: May – December 2026.*
- Consider 3-4 months No Cost Extension (NCE) for VMS work in Montenegro and Albania to ensure it is properly piloted, systems fully operational and sustainability plan in place and funded. *Responsibility: GFCM. Timescale: extension up to April 2027.*

Component 3

- Consider additional trials of eDNA barcoding if funding and time available. *Responsibility: GFCM. Timescale: July-December 2026, and up to March 2027 if NCE agreed.*
- Cut further activities to identify, develop and pilot measures to manage/ eradicate NIS due to funds, time and scale of problem. *Responsibility: SPA/RAC and UNEP/MAP. Timescale: from June 2026.*

- Develop plan and materials to promote uptake of key messages from studies undertaken under Component 3, particularly products published by SPA/RAC under Outputs 3.2 and 3.3 (tied to KMC, Recommendation 2). *Responsibility: SPA/RAC and UNEP/MAP, with inputs from GFCM. Timescale: July-August 2026.*

Component 4

- Discuss, agree and document a common understanding of 'NAP+' and whether the project should: (i) focus on just upgrading NAPs with additional fisheries inputs (NAP+), and/or (ii) support early stages of the process of developing Blue Economy Strategy/Plans in selected countries. If (i) agree with Government of Montenegro on the scope and process for development of 'NAP+' and deliverables before end of project (Dec 2026) and document this officially; if (ii) consider development of guidance materials to mainstream into on-going (already established) processes to develop national Blue Economy Strategies/Plans in Tunisia, Libya and Morocco, e.g., mainstreaming SAPBIO priorities/MPAs for SPA/RAC and UNEP/MAP and EBFM/SSF for GFCM in these national Blue Economy processes (**Note:** given this involves fisheries any guidance should be developed jointly with GFCM, not by SPA/RAC alone and without consultation with GFCM and the fisheries NFPs). *Responsibility: SPA/RAC and UNEP/MAP, with inputs from GFCM. Timescale: July-December 2026.*
- Develop clear written plan for SPA/RAC work under Component 4 for the remainder of project and consider the deliverables, targets, milestones and needs for 6-month NCE to allow SPA/RAC to deliver agreed activities. *Responsibility: SPA/RAC and UNEP/MAP, with inputs from GFCM. Timescale: July-August 2026.*

Recommendation 2: Strengthening KMC (Component 5) and wider dissemination of project messages and results

291. *Issue:* KMC have been constrained by a lack of a clear framework, fragmented and weak institutional arrangements, and limited guidance from FAO and UNEP/MAP. In addition, there has been an absence of a coordinated and project-specific approach, with GFCM and SPA/RAC developing and implementing KMC activities largely independently. The KMC strategy remains largely conceptual and not operationalized, resulting in ad hoc implementation and limited targeting of key stakeholders. Weak project positioning and the absence of a clear and consistent narrative have further affected project visibility and stakeholder understanding. In addition, limited monitoring of knowledge uptake, use and impact further constrains the effectiveness of KMC efforts.

Recommended actions:

- Strengthen KMC leadership and technical capacity at GFCM, including clearly defining roles and responsibilities across the GFCM project team, and designate a single overall KMC lead for the project *Responsibility: GFCM. Timescale: May-June 2026.*
- Strengthen institutional KMC capacity within SPA/RAC ensuring sufficient resources and dedicated support from UNEP/MAP KMC Unit. *Responsibility: SPA/RAC and UNEP/MAP. Timescale: May-June 2026.*
- Develop and implement a joint KMC strategy for the project with a better developed, more strategic vision clearly identified with key messages, target stakeholder groups/individuals (including project 'champions'), dissemination channels, timelines, budget/resource needs and monitoring framework, and link KMC efforts to an updated joint project Stakeholder Engagement Plan. *Responsibility: GFCM, SPA/RAC, FAO and UNEP/MAP. Timescale: May-December 2026 (and into 2027 depending on a NCE for some project activities).*
- Establish a clear and consistent narrative for the FishEBM Med project, explicitly distinguishing it from other GFCM and SPA/RAC and UNEP/MAP initiatives such as MedSea4Fish and FishEBM Black Sea project. *Responsibility: GFCM, SPA/RAC and UNEP/MAP. Timescale: May-June.*

- Strengthen joint KMC activities between GFCM and SPA/RAC, including: (i) establishing joint project communication mechanisms, e.g., dedicated single project webpage to host co-branded project communication pieces, knowledge products, lessons learned, etc.; (ii) Increasing organization of joint knowledge-sharing events and awareness-raising activities. *Responsibility: GFCM, SPA/RAC and UNEP/MAP. Timescale: May 2026 onwards.*
- Introduce mechanisms to track the uptake and use of knowledge products and events by GFCM, SPA/RAC and UNEP/MAP, e.g., follow-up surveys and qualitative reporting, to determine how project generated knowledge has informed decisions or practices. *Responsibility: GFCM, SPA/RAC and UNEP/MAP. Timescale: May 2026 onwards.*
- Undertake at least one structured ‘lesson learning’ exercise covering project experiences, processes and results and to highlight innovative aspects/results of project, including consideration of the project’s experiences with eDNA, FRA and marine litter and possibly capture results in an IW:Learn Experience Note. *Responsibility: GFCM and SPA/RAC. Timescale: December 2026.*
- Organize a ‘wrap up’ meeting of both the FishEBM Mediterranean and FishEBM Black Sea projects to exchange results on common areas (e.g., VMS, social economic data, bycatch solutions, awareness-raising), discuss challenges, identify synergies and potential follow up activities. *Responsibility: GFCM, SPA/RAC and UNEP/MAP, key stakeholders for both the FishEBM med and Black Sea projects. Timescale: May 2027.*

Recommendation 3 - Improving project coordination and cooperation/collaboration between UNEP/MAP, SPA/RAC and GFCM and environment and fisheries agencies on project activities

292. *Issue.* Although there are competent teams at UNEP/MAP, SPA/RAC and GFCM responsible for project execution and management MTR interviews revealed several areas where the effectiveness of the team could be improved, particularly on coordination, collaboration and communication and greater clarity on the division of roles and responsibilities between these teams, with a more formal framework/mechanisms to input into each other’s work. In addition, there is a need to improve communication with, and the involvement of, the NFPs, especially the environment NFPs.

Recommended actions:

- Improve collaboration and coordination between GFCM, UNEP/MAP and SPA/RAC and between environment and fisheries NFPs (to ‘link environment and fisheries agencies more tightly’ and improve the ‘culture of cooperation’).
- Capture activities/frameworks to promote cooperation at national and regional levels in the project’s Results Framework through creating a new Output (or possible Outcome) with associated activities, indicators and targets, and ensure new project coordination and management arrangements are documented in an updated project organogram.
- At the national level, suggested actions are to:
 - Hold initial workshop to establish framework for environment and fisheries NFPs to jointly undertake some project activities with deliverables, timetable/workplan, budget, roles, responsibilities, coordination mechanism, etc, (suggested areas for joint work could include: (i) environmental and fisheries data exchange; (ii) monitoring and management of vulnerable species (e.g., elasmobranchs); (iii) NAP+/BE plans; (iv) stakeholder information/ mapping; (v) KMC; (vi) gender).
 - Hold a joint online group meeting of the NFPs and the GFCM and SPA/RAC project teams every three months to present and discuss progress, challenges and follow up in each of the countries (and invite national GEF Operational Focal Points).
- At the regional level, suggested actions are to:
 - Identify and agree to a common set of joint GFCM-SPA/RAC activities for the remainder of project and the process for GFCM to contribute to SPA/RAC activities which have a

fisheries element (suggested areas for joint work could include: (i) NAP+/BE plans; (ii) remaining CCA-related work (fisheries element); (iii) monitoring and management of vulnerable species (e.g., elasmobranchs); (iv) sharing information from stakeholder mapping).

- Suggested actions to improve coordination between GFCM, SPA/RAC and UNEP/MAP are to:
 - Nominate a single lead (Project Coordinator) for the project who is given responsibility for overall coordination and to whom all project staff report (it is suggest that this is the TPM/PC at GFCM as FAO is the IA).
 - Develop a framework/mechanisms to ensure coordination, communication and inputs into each other's work such as establishing online monthly meetings of the GFCM and SPA/RAC project teams (including FAO LTO and UNEP/MAP equivalent) to discuss each team's progress, challenges, monthly work plan for remainder of project and explore, develop and coordinate on joint work/areas of overlap and needs.
 - Ideally, select a single lead for KMC and gender for the project (not separate leads for GFCM and SPA/RAC and UNEP/MAP)

Responsibility for both regional and national actions list above rests with UNEP/MAP, SPA/RAC and GFCM, with additional responsibility for the national actions to include the fisheries and environmental NFPs. Timescale: June 2026 onwards

Recommendation 4 - Strengthening partnerships and stakeholder engagement, and addressing gender issues

Stakeholder engagement and partnerships

293. *Issue.* Stakeholder engagement has been constrained by a lack of an operational Stakeholder Engagement Plan (SEP) that has remained largely descriptive. Engagement has been uneven across countries and stakeholder groups and has remained largely activity-driven rather than systematic. Limited clarity on stakeholder roles, and a lack of mechanisms to regularly inform and update stakeholders, and insufficient integration with KMC have reduced effectiveness. In addition, stakeholder mapping and platforms remain incomplete, further limiting structured and sustained engagement.

Recommended actions:

Partnerships and stakeholder engagement

- Explain use of data from stakeholder mapping to groups from which data was collected and their likely future involvement in fisheries management decision-making to ensure common understanding and to manage future expectations. *Responsibility: GFCM. Timescale: June-December 2026.*
- Jointly review and revise project Stakeholder Engagement Plan (SEP) to reflect current set of key partners and stakeholders, and link to revised KMC plan (see above) for more effective dissemination of results. *Responsibility: GFCM, SPA/RAC and UNEP/MAP. Timescale: June-July 2026.*
- Ensure key project stakeholders (listed in the SEP) are kept regularly informed of project results, developments and opportunities (again linked to the KMC plan), and NFPs should particularly be enabled to be 'champions' for the project where there is interest by provision of targeted project KMC products. *Responsibility: GFCM, SPA/RAC. Timescale: Ongoing.*
- Undertake lesson learning exercise to capture experiences of national and local stakeholder engagement to help inform future GFCM and SPA/RAC efforts. *Responsibility: GFCM, SPA/RAC. Timescale: October-November 2026.*

Gender

294. *Issue.* Gender integration has been constrained by a weak gender assessment and Gender Action Plan (GAP). Gender considerations have not been systematically mainstreamed across project activities, with limited targeted actions and weak reporting. In addition, institutional capacity for gender integration is limited at both GFCM and SPA/RAC, with no dedicated expertise and unclear responsibilities, reducing the effectiveness of gender-responsive interventions.

Recommended actions:

- Recruit dedicated gender expert and establish clearer project responsibility for gender mainstreaming. *Responsibility: GFCM, SPA/RAC and UNEP/MAP. Timescale: June-July 2026.*
- Jointly conduct a new gender assessment to identify opportunities for women's participation and benefits within both fisheries and environment sectors in Med (e.g., value chains, blue economy, co-management, research, fisheries and environmental management, public and private sector) and to inform project's gender-responsive actions for the remainder of the project, and any follow up project. *Responsibility: GFCM, SPA/RAC. Timescale: August-October 2026.*
- Ensure all future project activities consider opportunities to mainstream gender and fully document these activities in project reporting (PIR, PPR, etc). *Responsibility: GFCM, SPA/RAC. Timescale: June 2026 for PIR, November 2026 for PPR.*
- Review all project KMC products and identify where gender considerations can still be integrated and then, where possible, address these, particularly for issues which would impact on women, e.g., CCA workshop report and regional guidelines. *Responsibility: GFCM, SPA/RAC. Timescale: June 2026.*

Recommendation 5 - Improving project management and sustainability of project results

295. *Issue.* The GFCM and SPA/RAC teams have very competent staff however MTR interviews revealed some areas where the project management could be improved, including better division of roles and responsibilities, project monitoring and reporting on co-financing.

Recommended actions:

- Transfer responsibility for some technical areas covered by the GFCM PTM/PC – gender, socio-economic and KMC – to other GFCM staff - to enable the TPM/PC to focus on just project management for remainder of project, with all project leadership on KMC and gender devolved to separate leads. *Responsibility: GFCM. Timescale: May 2026.*
- UNEP/MAP to invest more staff time in project monitoring and oversight and providing technical support to SPA/RAC e.g. KMC, gender including clarifying the role of UNEP-MAP 'Project Manager' (technical advisor) in terms of his authority and inputs to SPA/RAC activities (also the title of his position within the project as that is also not clear). *Responsibility: UNEP/MAP and SPA/RAC. Timescale: May-June 2026.*
- Review and simplify the project reporting lines between SPA/RAC and UNEP/MAP, SPA/RAC and GFCM and UNEP/MAP and GFCM and ensure these are documented. *Responsibility: UNEP/MAP, SPA/RAC and GFCM. Timescale: May-June 2026.*
- Fully identify and properly report on all co-financing (GFCM to lead on this) and update accounting software used by SPA/RAC (provided by UNEP/MAP). *Responsibility: GFCM, UNEP/MAP and SPA/RAC, with guidance from FAO-GEF Unit. Timescale: May-June 2026.*
- Develop sustainability and exit plan for project in next 3-4 months, including follow up plans with potential funding identified. *Responsibility: UNEP/MAP, SPA/RAC and GFCM, and endorsed by PSC members. Timescale: May-June 2026.*

Recommendation 6 - Strengthening the project M&E and reporting framework

296. *Issue.* The project's M&E and reporting framework is constrained by weaknesses in the design of the results framework, including poorly formulated objectives, outcomes and non-SMART indicators, which limit effective performance assessment. Reporting has focused mainly on activities and outputs rather than outcomes and impacts. While M&E implementation has been generally adequate, limited attention to monitoring and reporting of cross-cutting areas (e.g. gender and stakeholder engagement) has been weak.

Recommended actions:

- Review and revise the project Results Framework to make project outcomes clearer (within the limits set by GEF) and replace the project outcome indicators with a set of 'SMARTer' project outcome indicators (including 2-3 gender-related indicators) with associated baselines and targets. *Responsibility: GFCM, SPA/RAC, UNEP/MAP, FAO and UNEP, and endorsed by the PSC members. Timescale: by June 2026.*
- Add an additional Output to capture 'cooperation between GFCM and SPA/RAC' with associated indicators and targets and add another Output to cover the project's M&E and reporting activities and include the standard set of activities (e.g. PIR, MTR, TE) to meet the request from the GEF. *Responsibility: GFCM, SPA/RAC, UNEP-MAP. Timescale: May 2026.*
- Update GEF Core Indicators 2 and 8 with new calculations. *Responsibility: GFCM, SPA/RAC, UNEP-MAP. Timescale: May 2026.*
- Strengthen reporting in PIRs and PPRs on gender and stakeholder engagement e.g., report against activities in revised GAP and SEP and gender-specific and stakeholder-engagement indicators. *Responsibility: GFCM, UNEP/MAP, SPA/RAC. Timescale: June 2026 for PIR, November 2026 for PPR.*
- UNEP/MAP, SPA/RAC and UNEP to urgently extend the ICA and PCA as once these agreements finish no further transfers of GEF payments can occur between UNEP to UNEP/MAP and from UNEP/MAP to SPA/RAC so project activities associated with UNEP/MAP and SPA/RAC will cease. *Responsibility: UNEP (NBO), UNEP/MAP, SPA/RAC. Timescale: new ICA and PCA or extension of existing ones by end of June 2026*
- Ensure PPG team are available to project management team during inception stage to explain project activities. *Responsibility: FAO. Timescale: first 3 months at beginning of each FAO-GEF project*

Recommendation 7 - Agree on No Cost Extensions for critical elements of project to ensure delivery and maximise impact and sustainability of project results

297. *Issue.* There have been some significant delays in delivery of project results, particularly in relation to the project activities undertaken by SPA/RAC due to the 15-18 month delay over the signing of the PCA with UNEP/MAP. Several project activities cannot be completed before the official end of the project in December 2026. Consequently, there is a need to consider whether a No Cost Extension (NCE) should be available to the project for up to an additional 6 months (to June 2027) to enable key project activities to be completed and the likely sustainability of these results increased.

Recommended actions:

- Identify key project activities which may need No Cost Extensions (NCE) for up to 6 months (ending June 2027) with a revised Results Framework to ensure delivery and maximise impact and sustainability of project results, agree on which activities should receive an extension and produce a plan for the NCE. Activities for consideration of a NCE include: KMC, VMS, NAP+/BE Plans, piloting of IUU data collection. *Responsibility for the above proposed actions rest with SPA/RAC,*

UNEP/MAP, GFCM and any plan for a NCE (for whatever elements) will need to be endorsed by members of the PSC and FAO and UNEP. Timescale: plan and endorsement by June 2026

Note: A NCE should only be considered for the SPA/RAC work if/when the extension to the PCA between UNEP/MAP and SPA/RAC and ICA between UNEP (NBO) and UNEP/MAP are finalised – they must be complete by the end of May 2026 or there will be insufficient time for any NCE to be effective. Also, any NCE will require reorganisation of budgets and has consequences for the GFCM, UNEP/MAP and SPA/RAC teams as there will be financial costs maintaining some or all the core team.

6. Lessons learned

298. Several lessons covering various aspects of the project's design and operation can already be drawn by the mid-term stage.

- If a project is not coherent – it is designed with elements that 'do not fit' with the overall objective and a weak causal logic – then the project will be difficult to understand and communicate and there will be confusion over the project's aims and planned results which will lead to less engagement by the main stakeholders.
- It is essential that projects are designed in full consultation (partnership) with participating stakeholders and that it reflects key national priorities to ensure full ownership of project activities or stakeholders will not fully engage with the project and commit important resources.
- Where a project is seeking an integrated approach involving thematic areas led by different GEF IAs with different executing partners (in this case FAO and GFCM for fisheries and UNEP with UNEP/MAP and SPA/RAC for marine environment management) it is important that joint activities are built into the project framework with clear targets, deliverables and indicators to measure progress, collaboration and success, along with mechanisms to ensure coordination and communication on joint activities, set out in the project document with a budget and roles and responsibilities for joint work clearly identified. Without these, the two groups will undertake their activities independently, leading to 'silos' within the project and reduced opportunities for 'integration'.
- The continued presence of project personnel between the project formulation stage and implementation (at least during the inception stage) would support communication and understanding of the key elements of a project, supporting efficiency and quick results. This is particularly important if the project team is new to the project (not involved in the design stage) and unfamiliar with FAO or GEF processes, as they may not understand the rationale for some project activities and/or need explanation on how to undertake some project activities. Consequently, FAO should consider retaining a proportion of the PPG funds (or of GEF IA fee) to pay for the involvement of key members of the project design team during the project inception period to act as advisors during the first few months of the project's execution and allow for a 'handover' to the new project team.
- Demanding FAO institutional processes and bureaucracy – notably FAO procurement processes - can be a drain on project personnel and cause significant (and unfortunate) delays with project activities. FAO needs to take a more flexible attitude and make allowances to accommodate particularly projects with field activities that are critically dependent on timing.

7. Annexes

Annex 1. Terms of reference for the MTR



Annex 2. MTR itinerary

Task	When/duration	Responsibility
Terms of reference preparation	June to July 2025	BH/RM, LTO, FLO and FAO GEF Unit MTR focal point, with input from UNEP/MAP
Terms of reference finalization	July 2025	BH/RM
Team identification	August and September 2025	BH/RM, LTO, FLO and FAO GEF Unit MTR focal point, with input from UNEP/MAP
Team recruitment	September and October 2025	BH with input from the FAO GEF Unit for international and national consultants
Briefing of MTR team	September-October 2025	BH/RM, supported by PTF and FAO GEF Unit as necessary
Reading initial background documentation	Mid-late October 2025	MTR team in preparation for the MTR
MTR inception report	By 7 November 2025	MTR team
Quality assurance and clearance of the MTR inception report	10-14 November 2025	BH/RM and the FAO GEF Unit MTR focal point
MTR interviews, meetings and visits	17 November 2025 - 9 January 2026	MTR team with the support of the PMU and UNEP/MAP
Presentation on initial findings and recommendations to key project team	4 February 2026	MTR team
Presentation on initial findings and recommendations to the Project Steering Committee of the FishEBM Mediterranean project	24 February 2026	MTR team
Production of first draft report for circulation	By 10 May 2026	MTR team
Circulation and review of first draft MTR report	5–10 working days for review	BH/RM, PMU, FAO GEF Unit MTR focal point, LTO for comments and quality control (organized by BH/RM)
Production of final MTR report	By late-May/early June 2026	MTR team
Management Response	1 month after the final report is issued	BH
Follow-up reporting in FAO PPR or GEF PIR	Maximum 6 months after the MR is issued	BH

Annex 3. Stakeholders interviewed during the MTR

First name	Last name	Position	Organization/ location
Lorenzo	Galbiati	Technical Officer, GEF Coordination Unit	FAO, Rome
Marco	Sacchetta	Funding Liaison Specialist, GEF Coordination Unit	FAO, Rome
Carlos	Fuentevilla	Fishery Officer – Blue Transformation, Lead Technical Officer for the project	FAO, Rome
Anis	Zarouk	Fishery Officer	FAO, Rome
Miguel	Bernal	Executive Secretary	GFCM, Rome
Nicolas	Ferri	Senior Liaison Specialist	GFCM, Rome
Anna	Carlson	Project Coordinator	GFCM, Rome
Andrea	Leone	Finance and Project-Cycle Officer	GFCM, Rome
Giulia	Chakkalakal	Monitoring and Evaluation Expert	GFCM, Rome
Guray	Dellal	Monitoring and Evaluation Expert	GFCM, Rome
Eleonora	Corsale	Knowledge Management Specialist	GFCM, Rome
Elisabetta	Morello	Senior Fishery Officer	GFCM, Rome
Paolo	Carpentieri	Fishery Resources Monitoring Officer	GFCM, Rome
Ahmed	Siliman	Compliance Officer	GFCM, Rome
Adèle	Peenaert	Communication Officer	GFCM, Rome
Claudette	Spiterri	IW Learn Manager	IWLearn, Paris
Tatjana	Hema	MAP Coordinator	UNEP
Mohamad	Kayyal	MedProgramme Management Officer	UNEP-MAP
Alessandro	Candeloro	Project Manager	UNEP-MAP
Senem	Elcin Berber	MedProgramme Gender Expert	UNEP, Athen
Mahmoud	Elyes Hamza	Director, SPA/RAC	SPA/RAC
Emna	Derouiche	SPA/RAC Technical Project Manager	SPA/RAC
Atef	Ouerghi	SPA/RAC Programme Officer	SPA/RAC
Tarek	Laccheb	Financial and Administrative Assistant	SPA/RAC
Cyrine	Bouafif	Programme Specialist	SPA/RAC
Syrine	Mosleh	Supports Blue Economy recently onboard	SPA/RAC
Dorra	Maaoui	Communication Officer	SPA/RAC
Alda	Ndoj	PSC member – Albania (environment)	Albania
Marco	Kule	PSC member – Albania (fisheries, alternate)	Albania
Chadi	Mohanna	PSC member – Lebanon (fisheries)	Lebanon
Lara	Samaha	PSC member – Lebanon (environment)	Lebanon
Hisham	Ghmati	PSC member – Libya (fisheries)	Libya
Igor	Vujovic	PSC member – Montenegro (fisheries, alternate)	Montenegro
Deniz	Frljuckic	PSC member – Montenegro (fisheries)	Montenegro
Tamara	Brajović	PSC member – Montenegro (environment)	Montenegro
Djurdjina	Bulatovic	PSC member – Montenegro (environment, alternate)	Montenegro
Fatima	Zohra Hassouni	PSC member – Morocco (fisheries)	Morocco
Bouchra	Haoujar	PSC member – Morocco (fisheries, alternate)	Morocco
Malouli Mohammed	Idrissi	PSC member – Morocco (fisheries, alternate)	Morocco
Ali Cheikh	Sboui	PSC member – Tunisia (fisheries)	Tunisia
Hajer	Ben Dhiab	PSC member – Tunisia (fisheries, alternate)	Tunisia
Samia	Kchouck	PSC member – Tunisia (environment)	Tunisia
Esra Fatma	Denizci Çakmak	PSC member – Türkiye (fisheries)	Türkiye
Esin	Karacaoğlu	PSC member – Türkiye (environment)	Türkiye

First name	Last name	Position	Organization/ location
Ramazan	Özkaya	President	Sür-Koop, national fisheries cooperative, Türkiye)
Ercan	Erdem	Senior Fisheries Engineer	Sür-Koop, national fisheries cooperative, Türkiye
Mehmet	Can Görgün	Member	Akyaka, national fisheries cooperative, Türkiye
Sevinç	Üksüplü Konkus	Member	Women in Fisheries society, Türkiye
Mehrez	Ben Hassen	Fisher	Tunisia
Ibtissem	Gobba	Member	Women-led group, Tunisia
Mariagrazia	Graziano	Senior Manager, Europe and the Mediterranean, Global Programs	Global Fishing Watch
Simone	Niedermueller	Regional manager, Wildlife	WWF Mediterranean programe (MMI)
Luca	Eufemia	Small-scale fisheries Manager	WWF Mediterranean programe (MMI)

Annex 4. MTR matrix (review questions and sub-questions)

MTR questions	Indicator	Sources	Method
1. Relevance, coherence, and ownership			
Overall questions (from MTR ToR)			
Is the project relevant and coherent?			
To what degree do the project stakeholders feel ownership of the project and its results?			
1. <i>Relevance and coherence</i> - To what extent are the project’s objectives and its intended outcomes congruent with GEF focal areas, strategic priorities and operational programmes, and FAO’s mandate and policies? - To what extent is the project in line with the needs and priorities of targeted global, regional and national stakeholders? - Have there been any changes in the relevance of the project since its formulation, such as new global, regional or national policies, plans or programs that affect the relevance of the project objectives and goals)? - If relevance has changed since project design, are there any changes that need to be made to the project to make it more relevant? - To what extent is the project addressing the real barriers preventing effective action to address unsustainable fisheries in the Mediterranean? - To what extent is the project design appropriate and coherent in addressing the identified issues at national and regional levels?	- Level of coherence with GEF and FAO objectives and policies - Alignment with FAO Country Programming Framework - Level of coherence between the project design and implementation and the global, regional and national priorities and existing capacity - Level of involvement of stakeholder in the design and implementation of the project - Public and private sector contributions to the project activities - Degree to which project results built on clearly identified global regional and national priorities and have been adopted by key stakeholders	- GEF and FAO policy and strategy documents - Project document - Project progress reports - Regional and national fisheries, environment and development policies and plans - FAO staff and project team - Key government officials - Key stakeholder representatives, including from private sector representatives - Representatives of other relevant donor-funded projects	Desk review
<i>Ownership</i> - To what extent have the intended beneficiaries and stakeholders been involved in the design and implementation? - What is the overall view about the degree to which the project and its results are ‘owned’ by the key stakeholders at regional, national and local levels?			Interviews
2. Effectiveness – progress towards results			
Overall questions (from MTR ToR)			

MTR questions	Indicator	Sources	Method
To what extent is the project achieving its objectives? To what extent is the project delivering on its indicator targets? To what extent has the project achieved wider results and impacts?			
<i>Delivery of activities and outputs</i> - How effectively has the project delivered on its expected outputs to date, in terms of their quality, quantity and timeliness (against milestones)? - Are there any additional activities that need to be added? - Have there been any unintended consequences or results? - To what extent have the financial and other resources been used by the PMU and other implementing partners? (actual disbursement versus planned) - How did the actual Project costs by activity vary compared to budget (variances)? Could financial resources have been used more efficiently?	- Degree to which the project met relevant milestones and indicator targets set out in the project's Results Matrix (logframe) and monitoring plan and other relevant indicators as appropriate - Disbursement according to work plans and associated budget sheets - Feedback derived from the project stakeholders on the delivery and quality of the project activities and outputs achieved to date	- Result matrix (logframe) - Project progress reports, especially PIR and FAO PPRs - Financial and budget reports - Project stakeholders from the regional, national and local levels - FAO staff and project team - PSC members	Desk review Interviews
<i>Attainment of outcomes</i> - To what extent has the project delivered on each its expected outcomes? - How would you rate the quality of the project's outcomes to date? - Have there been any unintended or wider changes due to the project? - To what extent can the attainment of results be attributed to the GEF-funded component (as opposed to other projects/interventions)? What would have happened without the GEF funding?	- Degree to which the project met relevant milestones and indicator targets set out in the project's Results Matrix (Logframe) and monitoring plan and other relevant indicators as appropriate - Feedback derived from the project stakeholders on the delivery and quality of the project outcomes achieved to date	- Result matrix (logframe) - Progress reports, especially progress reports e.g. PIR, PPRs - PSC reports - FAO staff and project team - Project partners and stakeholders	Desk review Interviews
<i>Achievement of project objective and likelihood of longer-term impact</i> - To what extent has the project achieved its overall objective? - Is there any evidence of environmental stress reduction e.g. in IUU fishing, and environmental status change e.g. improvement in target fish stocks, through the project reflecting Global Environmental Benefits? - What can be done to improve the likely achievement of positive longer-	- Assessment of the achievement of the project's results in relation to the project's causal logic as defined in the Theory of Change - Feedback from stakeholders on likely longer-term impacts, including evidence of uptake of new	- Project documents including PIR and PPR reports - Minutes of PSC meetings - FAO staff and project team - Project stakeholders	Desk review Interviews

Mid Term Review of the FishEBM Mediterranean Project

MTR questions	Indicator	Sources	Method
term impacts?	knowledge/ideas		
3. Efficiency Overall questions (from MTR ToR) To what extent is the project being implemented efficiently and cost effectively? To what extent is the pledged co-financing being delivered?			
- To what extent has the project been designed and implemented efficiently, cost-effectively, and in a timely manner and in relation to the levels of secured funding? - To what extent has the project put in place measures for cost and time sharing? - Where there any delays? If so why, and how have these affected project execution, costs and effectiveness? What efforts were made to overcome these problems? - Have financial resources been utilized efficiently? - How can efficiency be improved? - To what extent has management been able to adapt to any changing conditions to improve the efficiency of project implementation? - To what extent has the project succeeded in coordinating its work with other GEF and non-GEF projects (see list in Project Document)? And with the executing agencies?	- Level of utilization and rate of delivery of project budget (degree of difference in planned and actual expenses) - Availability and the quality of the financial and progress reports - Quality of the delivered outputs - Comparison of delivery of project's activities/results with its defined timeline in project document (and comparison with similar interventions) - Degree to which project made use of or built on related pre-existing data sources, initiatives/projects, institutions, agreements and partnerships, etc. - Level of coordination between executing agencies - Level of satisfaction of partners in the responsiveness of the project (adaptive management)	- Project budget and financial documents - Procurement plans - Work plans - Meeting reports/ minutes - Monitoring data - Progress reports - FAO staff and project team - Beneficiaries and key implementing partners	Desk review Interviews
4. Factors affecting performance Overall questions (to be addressed through analysis of specific issues presented below) To what extent are the implementing and executing agencies effectively discharging their roles and responsibilities? What have been the main challenges the project team has faced in delivering the project to date? How can the delivery be improved in the second half of the project - what changes are needed?			

MTR questions	Indicator	Sources	Method
<i>Project design and readiness</i> - Does the project document present a clear rationale for the project with coherent problem and barrier analysis? - Is the project's causal logic (set out in its Theory of Change) robust, coherent and clear? - To what extent are the project's objectives and components, clear, practical and feasible/realistic within the timeframe? - What were the key challenges faced in designing the project and how can the process be improved for future projects? - To what extent was the 'readiness' of the project partners and stakeholders assessed to enable the project to begin quickly?	- Level of coherence between project expected results and project design - Quality of the project design, result matrix and project indicators - Evidence that necessary "preparation and readiness" factors, conditions and other processes were considered in Project design	- Project document - Project design stage documents including PIF, GEFSEC and STAP reviews of project - Project progress reports - Steering Committee reports	Desk review Interviews
<i>Project execution and management</i> - What have been the main challenges in relation to the management and administration of the project? - Are all the administrative (including contractual) procedures operating well? - To what extent have FAO and UNEP (as the two GEF IAs) administrative processes such as recruitment of staff, procurement of goods and services (including consultants), preparation and negotiation of cooperation agreements etc. influenced the project's performance? - Are staffing arrangements adequate to deliver the project in the remaining timeframe? - What changes to project administration and management are needed to improve delivery for the remainder of the project? - Has execution by GFCM led (or is likely to lead) to specific benefits which if GFCM had not been the execution agency would not have occurred? If so what?	- Extent of delivery of the desired results - Evidence of approaches and adaptive management used in the implementation of the project to ensure the attainment of project results - Extent to which project partners committed time and resources to delivery of the project	- Project document - Results Matrix - Project progress reports (PIRs, PPRs) - FAO staff and project team - Key stakeholders and beneficiaries from the regional, national, and local levels - PSC members and minutes of meetings	Desk review Interviews
<i>Risk identification and management</i> - Have potential risks to the project been identified and is the mitigation strategy adequate? - Has the risk identification and mitigation table been completed and reviewed with the MTR? - How well have risks been managed by the project?	- Quality of risk identification - Quality of strategies taken to mitigate risks	- Progress reports - Results framework - Risk assessment reports, meeting reports/ minutes, monitoring data, progress reports - FAO MTR risk assessment	Desk review Interviews

Mid Term Review of the FishEBM Mediterranean Project

MTR questions	Indicator	Sources	Method
		- table - FAO staff and project team - Minutes of PSC meetings - Key stakeholders and beneficiaries	
<i>Financial management and co-financing</i> - What have been the financial management challenges of the project to date? - Are the budgets/financial planning adequate to complete the project and deliver the expected results? - Are financial resources well managed and accountable? Any irregularities? <i>Co-financing</i> - To what extent has co-financing materialized as expected? - Has there been any additional co-financing leveraged during project implementation and how has this contributed to the project's objectives? - How has any shortfall in the co-financing or unexpected additional funding affected project results	- Evidence that financial resource levels and cash flow management were adequate to support effective project management - Evidence that recruitment/procurement practice, use of financial resources and financial reporting followed proper standards - Level of transparency in the funds used - Evidence that co-financing levels were delivered	- Financial reports and audits - Workplans - Project progress reports - Completed GEF co-financing table - FAO staff (e.g. FLO) and project team - Key implementing partners (for co-financing)	Desk review Interviews
<i>Project oversight</i> - How effective is the coordination and decision-making among the Project Steering Committee (PSC) and Project Task Force? - To what extent has FAO delivered oversight and supervision and backstopping (technical, administrative and operational) during the project design and implementation phases? - Are there any changes needed to the project oversight arrangements e.g. change to membership of PSC?	- Evidence of effective project supervision and backstopping provided by FAO - Views of PSC and Project Task Force members - Views of key implementing partners	- FAO staff (e.g. LTO) and project team - Key implementing partners - PSC and Task Force members and meeting minutes	Desk review Interviews
<i>Partnerships and stakeholder engagement</i> <i>Key project partnerships</i> - To what extent has the project been successful in establishing effective relationships with key project partners, and how efficient are the various cooperation and collaboration arrangements (MoU, etc.)? - Is there sufficient capacity within key partners to enable them to be able to properly participate in the project? - To what extent have the project activities developed new and enhanced	- Existence of a stakeholder engagement plan - Existence of a stakeholder database - Evidence of approaches used to identify and engage stakeholders in project design and implementation - Analysis of strengths and	- FAO staff and project team - Main partner organizations - Key stakeholders from the national, provincial and municipal level - Other international donors - Progress reports - Meeting minutes	Desk review Interviews

MTR questions	Indicator	Sources	Method
partnerships/ relationships across relevant agencies, project partners, private sector, and stakeholders? - Are there any additional opportunities for linkage and partnerships that the project could take advantage of? <i>Stakeholder engagement</i> - Has the project fully identified and engaged with all relevant stakeholders, including civil society and private sector? - How has the project promoted collaboration among all relevant stakeholders? - To what extent have stakeholders been involved in project formulation and implementation? - How do the various stakeholder see their own engagement with the project? - Have stakeholders been made aware of the ESS plan and the grievance mechanism? - How can stakeholder engagement be improved?	weaknesses of partnership strategy and arrangements - The degree of effectiveness of partnership and collaboration arrangements with stakeholders - Quality of the utilization of partnerships	Monitoring data	
<i>Knowledge Management, Communication, Awareness raising/outreach</i> - Does the project have a structured system for capturing project results (knowledge) and communicating experiences and lessons learned – if so, how is the project assessing, documenting and sharing its results, lessons learned and experiences? - To what extent have the experiences and lessons learned from the project been identified and captured and communicated? - How effective has the project been in communicating and promoting its key messages and results to partners, stakeholders and a general audience? How can this be improved? - Are project communication and awareness-raising/outreach materials clear and comprehensible? - How visible has the project been to partners and stakeholders – what is their general opinion of the profile of the project to date?	- Existence of a knowledge management and communication strategy - Existence of a KM dedicated personnel for the project. - Degree of effectiveness of a system put in place to develop tools to capture results, generate, disseminate and document knowledge. - Degree of effectiveness of awareness-raising activities and strategies applied in project implementation - Review and analysis of project communication and awareness-raising/outreach materials e.g. online presence, project reports	- FAO staff and project team - Main partner organizations - Key stakeholders - Project documents - Progress reports - Project communication materials, including online presence (including social media)	Desk review Interviews

Mid Term Review of the FishEBM Mediterranean Project

MTR questions	Indicator	Sources	Method
<i>Monitoring and Evaluation (M&E)</i> <i>M&E - design</i> - To what extent is the project's M&E framework well-designed, robust and being applied? What are the tools put in place to assess the project? - To what extent are the project indicators specific, measurable, attainable (realistic), and relevant to the objectives, and time-bound (SMART)? - Are the targets and milestones in project's monitoring plan appropriate, realistic and sufficient to track progress and facilitate management towards outputs and outcomes? - Does the project's M&E framework consider women and men separately, e.g. in gender-disaggregated reporting data and indicators? - How could the M&E design be improved?	- Evidence and review of M&E plan to monitor results and track progress towards achieving project objectives - SMART indicators identified and used, adequate baselines set - Ring-fenced M&E budget allocated	- Results matrix - FAO staff and project team - Main partner organizations - Key project stakeholder - Project documents - Project progress reports, especially PIRs and PPRs - Other project M&E documents - Relevant correspondence related to FAO's and partners' design and management of the project	Desk review Interviews
<i>M&E implementation</i> - To what extent is the project M&E system operational and contributing to provide systematic information on the project outcomes and outputs targets? - Are roles and responsibilities for monitoring and reporting activities clear? - Are monitoring reports (e.g. GEF PIR, FAO PPR) sufficiently informative, produced in a timely manner and used for adaptive management? - How have project stakeholders been engaged in the design and implementation of monitoring? - To what extent has information generated by the M&E system during project implementation been used to adapt and improve project planning and execution, achievement of outcomes and ensure sustainability? Give examples. - How can the operation of the M&E system be improved?	- M&E arrangements made - Timing and implementation of M&E activities - Degree and timeliness of completion of M&E reports e.g. PIRs - Use of the project's Result Matrix as a management tool	- M&E reports - Project progress reports, especially PIRs and PPRs - Other project M&E documents - Key stakeholder groups	Desk review Interviews
5. Sustainability of project results Overall questions (from MTR ToR) What is the likelihood that the project results will be useful or persist after the end of the project? What are the key risks that may affect the sustainability of the project results and benefits?			
<i>General</i> To what extent is sustainability embedded in project activities and	Evidence of written exit and sustainability strategy	Project documents, project reports including PIRs	Desk review

MTR questions	Indicator	Sources	Method
results? - Does the project have a clear, credible sustainability strategy to ensure continuation of project results? - What is the likelihood that the project results will persist after the end of the project? - What does the project need to do to increase sustainability of its results		- FAO staff and project team - Key partners	Interviews
<i>Financial sustainability</i> - Are there any financial risks that may jeopardize the sustainability of the project results and progress towards impacts? - How dependent is the continuation of the project results and initiatives on continued financial support? In other words, what will happen when the GEF funding stops?	- Evidence of generated or leveraged funds that helped in project implementation - Evidence of follow-up funding of project results from global, regional or national partners after their integration into policy and institutional systems - Evidence of funding from donors and private sector to continue project activities	- Progress reports, especially financing and co-financing reports - Project documents - Key beneficiaries - Key stakeholders from the national and local levels - Key partners, e.g. GFCM, UNEP-MAP, national government policy statements and institutional workplans - Private sector annual reports	Desk review Interviews
<i>Socio-political sustainability</i> - Are there any social, legal or political factors that may influence (positively or negatively) the sustainability of project results and its progress towards impacts? If so, what are they? - To what extent are the key stakeholders committed to ensuring continued project results? To what extent did the project contribute to long-term social sustainability? - What is the level of engagement, participation and ownership of fisheries associations? - Is there any evidence of further commitment of the relevant global, regional or national stakeholders? - Which partnership/linkage are considered sustainable? - To what extent is the private sector likely to support project aims and results after the project ends and how critical is the private sector to the sustainability of the project results?	- Level of stakeholder ownership - Level of political commitment - Evidence of legislative and policy change supporting results of project - Promotion of project results and recommendations within GFCM and UNEP-MAP development and planning processes	- Progress reports - Project document - PSC members and meeting minutes - FAO staff and project team - Key partners and stakeholders - Other key beneficiaries	Desk review Interviews

Mid Term Review of the FishEBM Mediterranean Project

MTR questions	Indicator	Sources	Method
<i>Institutional and governance</i> - To what extent is the sustainability of project results and progress towards impact dependent on supportive institutional frameworks and governance? - To what extent does the project rely on continued development of partner's individual and organization capacities for sustainable delivery of outputs and outcomes? - To what extent did the project contribute to long-term institutional sustainability? - What is the level of engagement, participation and ownership of the government?	- Evidence of sufficient capacity to sustain results built at institutional levels among target participating institutions (both public and private sector) - Integration of project results into national institutional systems and practices (both public and private sector)	- FAO staff and project team - Key partners institutions - Other beneficiaries - Progress reports - Project document - PSC members and meeting minutes	Desk review Interviews
<i>Environmental risk</i> - Are there any external environmental factors (positive or negative) that could affect the sustainability of the projects? If so, what? - What risk do predicted climate change effects pose to the sustainability of project results?	Degree of impact of project on environment in project target areas	- FAO staff and project team - Key partners - PSC members - Project reports - Global, regional and national environmental reports	Desk review Interviews
<i>Replication and catalysis</i> - Does the project have a clear approach and strategy to promote and support scaling up, replication and/or catalysis of project results? - What project results, lessons and experiences generated by the project have been replicated⁴² or scaled up⁴³? - Has the project catalysed any policy, behavioural or institutional change to support more sustainable use and management of fisheries resources and the environment in the Mediterranean? - Has the project developed any incentives (social, economic, market-based, competencies, etc) that should help catalyse future support for more sustainable use and management of fisheries in the Mediterranean? - To what extent has the project created opportunities (and provided support) for specific individuals or institutions ("champions") to promote the aims and results of the project?	- Evidence of global, regional and national stakeholder awareness, interests, commitment and incentives to execute, enforce and pursue follow-up replication or catalysis of the project's results – plan for up-scaling of results - Evidence of wider uptake of key project messages - Evidence of incentives provided by project that have catalyzed behavioral changes - Evidence of changes to policy or increased institutional	- FAO staff and project team - Key project stakeholders especially GFCM, UNEP-MAP, government agencies and private sector - PSC members and minutes of their meetings - Project documents - Progress reports - Other project M&E documents	Desk review Interviews

⁴² Experiences that are repeated and lessons applied in different geographic areas

⁴³ Experiences are repeated and lessons applied in the same geographic area but on a much larger scale and funded by other sources

MTR questions	Indicator	Sources	Method
	programmes/projects and capacity among partners to address sustainable use and management of fisheries in the Mediterranean - Evidence of increased and sustained private sector financing for sustainable use and management of fisheries in the Mediterranean - Evidence of opportunities created for individuals or institutions ("champions") to promote the traditional more sustainable use and management of ABNJ		
6. Cross-cutting issues equity issues (e.g. gender, youth, vulnerable groups) and environmental and social safeguards Overall questions To what extent are gender equality and empowerment and other equity issues mainstreamed in the project, both in design and implementation (including M&E)? To what extent are environmental and social concerns taken into consideration in the design and implementation of the project? To what extent does the project conform to GEF and FAO goals and standards on gender equity?			
<i>Gender⁴⁴ and minority groups</i> - To what extent are gender equality considerations reflected in the project design and integrated into its implementation? - What were the project's achievements in terms of promoting gender equality and women's empowerment? - What targeted efforts have been made by the project and the implementing partners to ensure that women can participate in the project? - Does the project document include a clear and adequate analysis of relevant gender concerns? - To what extent do women take leadership roles and participate in decision-making processes and frameworks within the project? - Has the project had any impact on gender equality and economic empowerment for women and other marginalized groups?	- Evidence that sensitivity in gender has been observed in project design, implementation and monitoring and evaluation activities, including level of gender participation in project activities and events - Existence of a gender assessment - Existence of a gender dedicated personnel for the project - Disaggregated data routinely collected and analysed by project team as part of M&E	- Progress reports - Project document - Key beneficiaries and stakeholders - FAO gender group - FAO staff and project staff	Desk review Interviews

⁴⁴ Particular attention will be devoted to the four FAO's Gender Equality Objectives attainable at the level of initiative or thematic area: i) Equal decision-making; ii) Equal access to productive resources; iii) Equal access to goods, services and markets; iv) Reduction of women's work burden

Mid Term Review of the FishEBM Mediterranean Project

MTR questions	Indicator	Sources	Method
How can gender mainstreaming and the project's work to advance gender equality and women's empowerment be improved			
Environmental and social safeguards - To what extent have environmental and social concerns been taken into consideration in the design and implementation of the project? - Have all requirements of the Environmental and Social Safeguards Plan being complied with?	- Degree of impact of project activities and results on local environment and society at project sites and region - Review of ESS analysis from the PPG stage	Project Document Project progress reports (PIRs and PPRs) FAO staff and project team ESS document	Desk review Interviews
7. Final questions			
<i>No specific key question but useful to summarise main views of interviewee and further help identify recommendations</i>			
- What for you personally are the top 2 or 3 successes and the top 2 or 3 failures of the project to date? What are you most pleased the project has done, and what are you most disappointed the project has failed to do? - What do you ultimately hope the project will achieve? - If you were involved in the project again, what would you do differently? In other words, what lessons have you learned to date from the project? - Are there any specific recommendations for the remainder of the project you think the MTR team should consider to improve the impact of the project?			

Annex 5. List of documents consulted

1. GEF PIF
2. Comments from the GEF Secretariat, the GEF Scientific and Technical Advisory Panel (STAP) and GEF Council members on project design, plus FAO responses
3. Request for GEF CEO Endorsement
4. GEF-approved Project Document
5. Project inception report
6. Annual GEF PIR reports
7. Six-monthly FAO PPRs
8. Annual workplans and budgets (including budget revisions)
9. Documentation detailing any changes to the project framework or components, such as changes to originally designed outcomes and outputs
10. List of stakeholders
11. Execution agreements under Letters of Agreement
12. Relevant technical, backstopping and project-supervision mission reports, including back-to-the-office reports by relevant project and FAO staff, including any reports on technical support provided by FAO headquarters or regional office staff
13. Minutes of the meetings of the PSC and M&E and KMC Working Groups, and Program Coordination Meetings
14. ESS analysis and mitigation plans produced during the project design period and online records on FPMIS
15. Various KMC materials produced by the project, including website materials, leaflets, etc,
16. Finalized GEF-7 core indicators for GEF-7-approved projects, as defined in the Core Indicators Worksheet (GEF, 2019a)
17. Financial management information, including an up-to-date co-financing table (provided on 30 July 2025), a summary of any financial revisions made to the project and their purpose
18. The GEF Gender Policy (GEF, 2017), GEF Gender Implementation Strategy (GEF, 2018a), GEF Guidance on Gender Equality (GEF, 2018b) and the GEF Guide to Advance Gender Equality in GEF Projects and Programmes (GEF, 2018c)
19. FAO Policy on Gender Equity and the Guide to Mainstreaming Gender in FAO's Project Cycle (FAO, 2017a)
20. CEO endorsement/approval of child projects under the programme

Annex 6. Results matrix showing achievements at mid-term and MTR observations

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
Project Objective: To reverse the overexploitation of select commercial living marine resources of Mediterranean countries in support of their blue economy development pathway.	1) Number of hectares of marine protected areas, fisheries restricted areas and/or other effective area-based conservation measures (OECMs) created or under improved management for conservation and sustainable use	1) 0 million hectares Marine Protected Areas created or under improved management for conservation and sustainable use	17 million hectares	1) 60,000 hectares Marine Protected Areas created or under improved management for conservation and sustainable use	1) 125,845 hectares Marine Protected Areas created or under improved management for conservation and sustainable use	S	Target achieved. Claim that '593,618 hectares of Marine Protected Areas created or under improved management for conservation and sustainable use' in PIR, but no direct activities in MPAs through project. However, target reached by considering the project's contribution to establishment of an FRA in the Otranto Channel (220,000 ha) which means even end of target achieved.
	2) Landings from fisheries under sustainable management	2) 27 000 tonnes of landings from fisheries under sustainable management	114 400 tonnes of landings from fisheries under sustainable management (i.e. covered by multiannual management plans) or currently sustainable	2) 100 000 tonnes of landings from fisheries under sustainable management or currently sustainable.	2) 238 000 tonnes of landings from fisheries under sustainable management or currently sustainable.	S	142 180 tonnes of landings from fisheries under sustainable management (i.e. covered by multiannual management plans) or currently sustainable
	3) Number of countries having complete data on fisheries-dependent employment, disaggregated by	3) 8 x countries with fisheries-dependent employment data (not gender disaggregated and only vessel-based employment)	8 countries with fisheries-dependent employment data (not gender disaggregated and only vessel-based employment) and advances made to revise data submission platform	3) 8 x countries with gender disaggregated fisheries-dependent employment data (only vessel-	3) 8 x countries with gender disaggregated fisheries-dependent employment data (along the full value chain)	S	8 countries with estimates of gender-disaggregated fisheries-dependent employment data along the value chain, as reported in SoMFi 2025. Further data collection underway in the context of relevant socioeconomic surveys being implemented through the project. Decision taken at annual session of the GFCM in November 2024 to revise the GFCM's data submission platform (the DCRF) to facilitate submission of gender disaggregated data. The data is summarized in the 2025 publication of SoMFi

⁴⁵ Self-reported in PIR report for June 2023

⁴⁶ Colour-coded red, yellow or green

Green = Achieved	Yellow = On target to be achieved	Red = Not on target to be achieved
------------------	-----------------------------------	------------------------------------

⁴⁷ Use the six-point progress-towards-results rating scale: (HS); **satisfactory (S)**; **moderately satisfactory (MS)**; **moderately unsatisfactory (MU)**; **unsatisfactory (U)**; **highly unsatisfactory (HU)**

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	gender, along the value chain		to facilitate gender disaggregated data.	based employment)			
Component 1: Strengthened capacity to manage commercial fisheries, with particular focus on SSF.							
Outcome 1 Fisheries managers and stakeholders use sound information generated on the status of key commercial fisheries to support improved management and selected value chain interventions, particularly for SSF, in view of maximizing production sustainability	1) Number of countries where data collection campaigns/surveys have been carried out to collect biological and gender-disaggregated socio-economic data	1) 0 x countries where data collection campaigns/surveys have been carried out to collect biological and gender-disaggregated socio-economic data	2 countries	1) 4 x countries where data collection campaigns/surveys have been carried out to collect biological and gender-disaggregated socio-economic data	1) 8 x countries where data collection campaigns/surveys have been carried out to collect biological and gender-disaggregated socio-economic data	MS	Data collection campaigns, surveys-at-sea and/or socioeconomic surveys have been carried out in 5 countries (Albania, Algeria, Lebanon, Montenegro and Türkiye), with activities underway (not yet completed) in an additional 1 country (Tunisia) and foreseen to start in an additional 2 countries (Libya and Morocco). However, there is uncertainty over its use in fisheries management decision-making processes.
	2) Number of GFCM Mediterranean key fisheries for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation	2) 0 x GFCM Mediterranean key species for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation	0 alternative management measures identified		2) 4 x GFCM Mediterranean key species for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation	MS	Alternative management measures, incorporating socioeconomic aspects and stakeholder input, have been identified for 2 key species (Bamboo coral and blackspot sea bream). Work is underway for an additional 2 species (round sardinella and deep-water red shrimp), including in the context of developing a framework for data poor Management Strategy Evaluations.
	3) Number of fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain	3) 0 x fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain	0 fisheries value chains addressed	3) 2 x fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain	3) 7 x fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain	MU	1 fisheries value chains (round sardinella) has been addressed. Delays on regionally harmonised approach and training, and target of 3 VCs not realistic. In November 2024, the annual session of the GFCM endorsed the need for a common regional value chain methodology. A first draft of this methodology has been prepared (with a value chain study for round sardinella conducted), with additional pilots under discussion, and training on the methodology commenced in mid-2025.

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	4) Number of stakeholder organizations – including women's organizations – having received capacity development support	4) 0 x stakeholder organizations – including women's organizations – having received capacity development support	30 stakeholder organizations, including women's organizations, have received capacity development support	4) 4 x stakeholder organizations – including women's organizations – having received capacity development support	4) 8 x stakeholder organizations – including women's organizations – having received capacity development support	MS	Ongoing. End target achieved. 30 organizations have received capacity development support in relation to enhancing market-based solutions for non-indigenous species (SSF Forum workshop, 21-23 November 2023, Gökova Bay, Türkiye). However, questions remain regarding the inclusiveness of representation, particularly for women and less visible groups which is unclear and not clearly reported and the limited involvement of wider stakeholder groups, e.g. NGOs (although high interest) or direct involvement of private sector. A stakeholder mapping exercise, based on a common framework, is underway in view of better facilitating stakeholder integration into GFCM management work, which will also facilitate better quantifying direct and indirect stakeholder capacity development work being carried out.
	5) Number of countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	5) 0 x countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	0 countries where initiatives promoted for social protection access	5) 0 x countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	5) 3 x countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	S	Initiatives promoted for social protection access in 0 countries (Mid term target is 0). The project originally foresaw for the Year 2 work plan data collection activities to support social protection access for fisheries in Lebanon, however in consultation with the Lebanese focal point it was agreed not to proceed with this activity as data would be biased due to the current geopolitical situation. An alternative approach, consisting of a workshop on enhancing socially sustainable blue crab fisheries was foreseen to be held instead in Tunisia during Q4 of Year 3, however this faced administrative issues in Tunisia for holding this meeting.
Component 2: Enhanced integration of emerging monitoring, control and surveillance technologies in the fight against IUU fishing							
Outcome 2 Fisheries management better accounts for the quantity and magnitude of IUU fishing in the Mediterranean Sea and incorporates control measures, including through the use	1) Number of countries for which an assessment is available	1) 0 countries for which an assessment is available	0 countries	1) 4 x countries for which an assessment is available	1) 8 x countries for which an assessment is available	MU	PPR 2025 claims end target achieved but no assessment has been made on socio-economic impacts of IUU fishing in any target country. Instead, an assessment of legislative gaps, contributing to IUU fishing, has been carried out for 8 countries (Algeria, Albania, Lebanon, Libya, Montenegro, Morocco, Tunisia and Türkiye).
	2) Number of fisheries for which an IUU quantification is available	2) 0 fisheries for which an IUU quantification is available	0 fisheries for which an IUU quantification is available		2) 2 fisheries for which an IUU quantification is available	U	0 fisheries for which an IUU quantification is available. The activity was reformulated by the 2025 PSC, following the request from contracting parties at the GFCM SAC to revisit the methodology. The new approach emphasizes training on IUU assessment methodologies and the contract for executing this activity was awarded in December 2025 (with work initiating in Q1 2026).
	3) Number of legislation- related documents in repository/database	3) 0 x legislation-related documents in repository/database	15 legislation-related documents in repository/database	3) 25 x legislation-related documents in	3) 50 x legislation-related documents in	HS	Target achieved. 150 legislation-related documents in repository/database.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
of emerging technologies				repository/ database	repository/ database		
	4) Number of MCS system launched or solutions applied at country level	4) 0 x MCS systems launched or solutions applied at country level	0 MCS systems launched / solutions applied at country level	4) 2 x MCS systems launched or solutions applied at country level	4) 5 x MCS systems launched or solutions applied at country level	HS	Target achieved. 8 MCS technology solutions were applied to assess the feasibility and performance of technologies under national conditions. 5 were applied in Montenegro (i.e. BlueTraker, Loqus, Satlink, Succorfish and PinPoint) and, in coordination with the sister FishEBM BS project, an additional 3 were applied in Türkiye (Mediterranean and Black Sea) (i.e. CLS, Globalstar and OrbComm).
	5) Number of measures in place to mitigate the impacts of by-catch, discards and abandoned fishing gear.	5) 0 x measures in place to mitigate impacts of by-catch, discards and abandoned fishing gear	0 measures in place	5) 3 x measures in place to mitigate impacts of by-catch, discards and abandoned fishing gear	5) 7 x measures in place to mitigate impacts of by-catch, discards and abandoned fishing gear	S	1 measure in place to mitigate impacts of abandoned fishing gear (via a graphic novel on ALDFG raising awareness about the implementation of the GFCM gear marking recommendation). Activities were launched during the reporting period (not yet completed) in Türkiye (bycatch mitigation), Albania (discards monitoring) and Morocco (retrieval of ALDFG) which are expected to lead to an additional 3 measures
Component 3: Integrated ecosystem-based management tools and ecosystem approach to biodiversity protection and sustainable fisheries.							
Outcome 3 Healthier marine ecosystems with more productive fisheries in place, through the synergistic application of ecosystem-based conservation/ management tools and improvements in fisheries tenure governance	1) Number of area-based or innovative management tools identified	1) 0 x area-based or innovative management tools identified	0 area-based management tools identified	1) 4 x area-based or innovative management tools identified	1) 8 x area-based or innovative management tools identified	S	4 management tools identified, supporting enhanced area-based and ecosystem-based conservation efforts. A FRA was established in November 2024 in the Otranto Channel in the Adriatic Sea, based on project work carried out (ROV survey, socioeconomic assessment and stakeholder consultation) to assess sensitive benthic habitats comprising <i>Isidella elongata</i> in GSA 18 (Albania) and potential impacts of the closures. Additional tools to inform more holistic management were identified via a study finalized in the reporting period to assess the impacts of underwater noise from trawl vessels in the Adriatic Sea and sensitive benthic data collection in Albania and in Montenegro.
	2) Percent of data on commercial fisheries and incidentally caught vulnerable species integrated in IMAP based national monitoring plans of the Good Environmental Status of marine waters and marine ecosystem, in	2) 0 percent of data on commercial fisheries integrated into monitoring plans	0 percent of data on commercial fisheries integrated into monitoring plans.	2) 35 percent of data on commercial fisheries integrated into monitoring plans	2) 70 percent of data on commercial fisheries integrated into monitoring plans	MU	0 percent of data on commercial fisheries integrated into monitoring plans. Since fisheries data collection falls under GFCM exclusive mandate, this activity is no longer relevant in its current form. In close consultation with GFCM, it is proposed to revise the activities to better reflect the current context and foster collaboration between GFCM, UNEP/MAP, and SPA/RAC. The new proposed action (to be discussed by the PSC) is: Technical assistance to interested Partner Countries to improve their capacity for collecting data on incidentally caught vulnerable species.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	interested countries						
	3) Number of developed Guidelines document for the integration in national monitoring plans of the contribution to the Good Environmental Status of marine waters and marine ecosystem by commercial fisheries data	3) 0 x Guidelines documents developed	0 Guidelines developed	3) 0 x Guidelines documents developed	3) 1 x Guidelines documents developed	NA	0 guidelines developed. Since fisheries data collection falls under GFCM exclusive mandate, this activity is no longer relevant in its current form. In close consultation with GFCM, it is proposed to revise the activities to better reflect the current context and foster collaboration between GFCM, UNEP/MAP, and SPA/RAC. The set of new proposed action (to be discussed by the PSC) is to: 1- Develop a Compendium of Good Practices for the environment–fisheries interface, clarifying mandates and areas of collaboration, followed by 2- Joint Coordination Meeting with national focal points from GFCM and SPA/RAC to align strategies and validate the compendium.
	4) Number of national/local adaptation strategies or action plans to climate change in coastal areas formulated that respond to the different needs and priorities of women and men fishers and fishworkers, and affected communities	4) 0 x adaptation strategies or action plans to climate change in coastal areas formulated so as to respond to the different needs and priorities of women and men fishers and fishworkers, and affected communities	0 adaptation strategies or action plans to climate change in coastal areas formulated	4) 2 x adaptation strategies or action plans to climate change in coastal areas formulated so as to respond to the different needs and priorities of women and men fishers and fishworkers, and affected communities	4) 5 x adaptation strategies or action plans to climate change in coastal areas formulated so as to respond to the different needs and priorities of women and men fishers and fishworkers, and affected communities	MU	0 adaptation strategies or action plans to climate change in coastal areas formulated. At the MTR point. A draft guideline was prepared and presented during a workshop on climate change adaptation in coastal areas to introduce the guidelines. 5 adaptation strategies and/or action plan(s) are expected for the end of project (Morocco, Tunisia, Libya, Lebanon, Montenegro)
	5) Number of measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors	5) 0 x measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors on	0 measures developed and disseminated	5) 2 x measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential	5) 4 x measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential	S?	9 measures developed and disseminated. 1 workshop held, 1 guideline published and disseminated, 4 short videos realised and published on social media, 2 stories published on IW-Learn newsletter.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	on biodiversity and marine ecosystems	biodiversity and marine ecosystems		stressors on biodiversity and marine ecosystems	stressors on biodiversity and marine ecosystems		
	6) Number of countries with an equal representation of men and women participating in regional training programmes and/or case studies on fisheries tenure	6) 0 x countries participating in regional training programmes and/or case studies on fisheries tenure	18 countries (of which 6 are project beneficiary countries) participating in regional workshop on fisheries tenure	6) 0 x countries participating in regional training programmes and/or case studies on fisheries tenure	6) 8 x countries participating in regional training programmes and/or case studies on fisheries tenure	S	6 beneficiary countries participated in a regional workshop on fisheries tenure
Component 4: Innovative blue economy solutions accounting for the fishery sector							
Outcome 4 Blue economy at the regional and country level promoted through the identification of existing hurdles via a concerted approach among relevant stakeholders	1) Number of mobilized investments identified in context of marine spatial planning	1) 0 x mobilized investments identified in context of marine spatial planning	0 mobilized investments	1) 2 x mobilized investments identified in context of marine spatial planning	1) 5 x mobilized investments identified in context of marine spatial planning	MU	0 investments mobilized. Advances in terms of investments mobilized foreseen principally in the final part of the project after activity results emerge. Investments mobilized foreseen principally in the final part of the project after activity results emerge. Not part of Year 3 work plan.
	2) Number of fact sheets/communications materials with information on innovative opportunities for the blue economy-related investment	2) 0 x fact sheets/communications materials with information on innovative opportunities for the blue economy-related investment	1 communication material produced on market-based solutions to non-indigenous species	2) 2 x fact sheets/communications materials with information on innovative gender sensitive opportunities for the blue economy-related investment	2) 4 x fact sheets/communications materials with information on innovative opportunities for the blue economy-related investment	U	1 communication material produced on market-based solutions to non-indigenous species.
	3) Number of countries with endorsed pilot NAP+ with investment plan(s) tested	3) 0 x countries with endorsed pilot NAP+ with investment plan(s) tested	0 countries with endorsed pilot NAP+ with investment plans tested	3) 0 x countries with endorsed pilot NAP+ with investment plan(s) tested	3) 1 x countries with endorsed pilot NAP+ with investment plan(s) tested	MS	0 countries with endorsed pilot NAP+ with investment plans tested. The Terms of Reference for recruiting national blue economy experts have been finalized and launched. The experts will conduct a study on the potentialities and possible constraints of blue economy sectors across the nine beneficiary countries. The national expert team for Montenegro has been contracted. The regional experts have also been hired. The current process is leading to supporting the process of endorsement in the following countries: Montenegro, Tunisia, Morocco and Libya

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	4) Number of Regional Guidelines document for the preparation of a NAP+ drafted	4) 0 x Regional Guidelines document for the preparation of a NAP+ drafted	0 regional guidelines documents drafted for the preparation of a NAP+	4) 0 x Regional Guidelines document for the preparation of a NAP+ drafted	4) 1 x Regional Guidelines document for the preparation of a NAP+ drafted	MS	0 regional guidelines documents drafted for the preparation of a NAP+. The regional experts were hired, to assist the NAP+ process in Montenegro, Tunisia, Morocco and Libya and draft the regional guidelines document for the preparation of a NAP+.
	5) Number of actors participating in new governance partnerships	5) 0 x actors participating in new governance partnerships	0 actors participating in new governance partnerships	5) 5 x actors participating in new governance partnerships and 25% of actors representing or represented by women	5) 10 x actors participating in new governance partnerships	MU	0 actors participating in new governance partnerships. The process is ongoing in Montenegro, the national coordinator and the national expert were hired, and supported by the regional expert.
Component 5: Knowledge management and outscaling							
Outcome 5 Integrated pathways conducive of conservation and sustainable management promoted at the regional and global level.	1) Number of national FishEBM Med/Post 2020 SAPBIO stakeholders platform established and number of public and private actors involved in each platform	1) 0 x platforms established and 0 x actors involved	0 platforms established	1) 3 platforms established and 4 actors involved in each platform	1) 6 platforms established and 4 actors involved in each platform	U	Ongoing. 1 platform established. The PPR states that during the MedProgramme Outreach Meetings organized in September 2025 in Tunis, the national FishEBM Med stakeholders were invited, a dedicated session was organised and the national platform was launched. The process is ongoing in Montenegro, and CFCs in the other countries are launched and the selection process is underway.
	2) Number of awareness raising communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.	2) 0 x awareness raising communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.	14 awareness raising communication pieces presented in regional and global fora on objectives, progress and accomplishments of the GFCM-MAP approach.	2) 12 x awareness raising communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.	2) 24 x awareness raising communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.	MS	Ongoing. 72 awareness raising communication pieces presented in regional and global fora on objectives, progress and accomplishments of the GFCM-MAP approach. The PPR 2025 states the following communication pieces under this outcome: • 48 social media posts (LinkedIn, X, Facebook) • 23 webnews (FAO, GFCM, IWlearn webpages) • 1 publication These communication efforts demonstrate attempts to raise visibility of project activities and results. However, communication materials specifically dedicated to explaining the FishEBM Mediterranean project itself at its initiation, was limited. Stakeholders revealed inconsistencies in the understanding of the project's overall objectives showing a lack of a shared and common understanding of the project's purpose. Also, confusion persists between activities conducted under the FishEBM Mediterranean project and those implemented under the MedSea4Fish

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
							programme. In addition, some knowledge products display the MedSea4Fish branding with limited or no reference to the FishEBM Mediterranean project, which further dilutes the project's identity and visibility.
	3. Number of outreach and communication strategies developed and under implementation	3. 0 x outreach and communication strategy developed and under implementation	1 outreach and communication strategy developed and under implementation.	3. 1 x outreach and communication strategy developed and under implementation	3. 1 x outreach and communication strategy developed and under implementation	S	Finalized but to be revised. 1 outreach and communication strategy developed and under implementation following an adaptive approach regularly revised with the PSC. The project developed a KMC strategy intended to guide the generation, dissemination, and uptake of knowledge produced. However, the strategy remains largely conceptual and lacks sufficient operational detail to effectively guide implementation. It does not include a time-bound and joint action plan developed by both GFCM and SPA/RAC, clearly defining roles and responsibilities, resource allocation, or monitoring activities. It also does not clearly specify which knowledge products are intended for which users and for what purpose.
	4) Number of information and communication items available through the knowledge sharing platform	4) 0 x information and communication items available through the knowledge sharing platform	0 information and communication items for the project available through the MedProgramme Knowledge Management Platform	4) 20 x information and communication items available through the knowledge sharing platform	4) 50 x information and communication items available through the knowledge sharing platform	HU	5 information and communication items for the project available through the MedProgramme Knowledge Management Platform. The PPR 2025 provides a list of communication items supposedly available in the MedProgramme knowledge management platform. However, these are published in UNEP or IWlearn websites. At design stage, the platform was intended to serve as a central tool for project management and communication, including a portal to showcase progress and results, a database for storing project data, and visualization tools to support analysis and dissemination. In practice, however, the platform has not been utilized. Although it includes references to the FishEBM Mediterranean project, it does not provide comprehensive or up-to-date information on results from SPA/RAC and GFCM activities. • Inspiring Impact: Mediterranean Coast Day 2025 Celebrates Shared Action for Resilient Shores (published 30-Oct-2025) • The urgency of integrated approaches: FishEBM Med Workshops on non-indigenous species (published 30-Oct-2025) • The Blue Crab Success Story: How Fishers Turned an Ecological Threat into a Model of Sustainable Fishing and Community Resilience in Tunisia (published 30-Oct-2025) • Third MedProgramme Annual Stocktaking, Istanbul 8–10 April 2025 (published 25-Jun-2025) • مصايد الأسماك والإدارة القائمة على النظم الإيكولوجية للاقتصاد الأزرق في البحر الأبيض المتوسط (published 10-Jun-2025) • Fisheries and Ecosystem Based Management for the Blue Economy of the Mediterranean (published 10-Jun-2025)

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
							Pêche et Gestion Écosystémique pour l'Économie Bleue en Méditerranée (published 10-Jun-2025)
	5) Number of meetings attended at the regional and global level as relevant to the attainment of GEF objectives	5) 0 x meetings attended at the regional and global level as relevant to the attainment of GEF objectives	4 regional and global meetings attended to disseminate project outcomes	5) 7 x meetings attended at the regional and global level as relevant to the attainment of GEF objectives	5) 15 x meetings attended at the regional and global level as relevant to the attainment of GEF objectives	MS	Ongoing. 18 regional and global meetings attended to disseminate project outcomes and lessons learned, including: To disseminate project outcomes, the GFCM and SPA/RAC participated in several regional and global knowledge-sharing events during the reporting period. These include the 22nd Large Marine Ecosystems Consultation Meeting (LME22, July 2023), 46th annual session of the GFCM (November 2023), the World Fisheries Congress (March 2024), the 23rd Large Marine Ecosystems Consultation Meeting (LME23, June 2024), the 10th GEF International Waters Conference (IWC10, September 2024), the 4th meeting of the SOI Global Dialogue (October 2024), 47th annual session of the GFCM (November 2024); Workshop to discuss and identify the appropriate measures for the reduction of new introductions and for eradication/control of NIS (January 2025), Meeting of the Ecosystem Approach Correspondence Group on Monitoring (CORMON) Biodiversity and Fisheries (April 2025), the MedProgramme ASM (April 2025), 11th Meeting of the Post-2020 SAPBIO National Correspondents (April 2025), the 24th Large Marine Ecosystems Consultation Meeting (LME24, May 2025), 17th meeting of SPA/BD Focal Points (May 2025), the UN Oceans Conference (June 2025), 12th meeting of EcAP Coordination Group (September 2025), Meeting of the MAP Focal Points (September 2025), the 48th annual session of the GFCM (November 2025) and the launch of the 2025 edition of SoMFi (November 2025). However, while participation in such events has supported external visibility and learning within the International Waters community, non were organised by GFCM and SPA/RAC together. Also, evidence of how these exchanges have been systematically captured and translated into project learning or operational improvements remains limited. Opportunities to consolidate lessons learned and facilitate knowledge sharing across countries is limited.
OUTPUTS (not rated)							
Component 1: Strengthened capacity to manage commercial fisheries, with particular focus on SSF.							
Output 1.1: Regional data collection for fisheries, including SSF and recreational fisheries,	1) Number of countries where data collection campaigns/surveys have been carried out to collect biological and	1) 0 x countries where data collection campaigns/surveys have been carried out to collect biological and gender-	A demersal survey-at-sea was carried out in Algeria and an exploratory survey-at-sea was carried out in Lebanon Preparatory work (onboarding of	1) 4 x countries where data collection campaigns/surveys have been carried out to collect biological	1) 8 x countries where data collection campaigns/surveys have been carried out to collect biological		Data collection campaigns, surveys-at-sea and/or socioeconomic surveys have been carried out in 5 countries (Albania, Algeria, Lebanon, Montenegro and Türkiye), with activities underway (not yet completed) in an additional 1 country (Tunisia) and foreseen to start in an additional 2 countries (Libya and Morocco). However uncertainty over its use in fisheries management decision-making processes.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
processed in support to socio-economic analysis and fisheries management	gender-disaggregated socio-economic data	disaggregated socio-economic data	consultants, preparation of sampling plans and questionnaires, etc.) was carried out for national fleet socioeconomic surveys in Tunisia and Türkiye, with data collection starting in Türkiye A socioeconomic survey of Albanian trawl vessels potentially fishing in the Otranto Channel was carried out in view of assessing the potential socioeconomic impacts of declaring a Fisheries Restricted Area (FRA) in the Otranto Channel.	and gender-disaggregated socio-economic data	and gender-disaggregated socio-economic data		Some surveys-at-sea were delayed: Algeria (pelagic survey-at-sea) due to equipment damage; Lebanon (exploratory demersal survey-at-sea) due to geopolitical situation.
Output 1.2: Investments in management plans and measures promoted, including for SSF and recreational fisheries	2) Number of GFCM Black Sea key fisheries for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation	2) 0 x GFCM Mediterranean key species for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation	Priority coastal species identified during the PPG phase by the GFCM's Working Group on Small-Scale Fisheries (WGSSF) Consultants contracted and advances made towards future data poor MSEs for 3 key species (deep-water red shrimp, round sardinella and blackspot seabream). Regional workshop on "Connecting scientists and fishers in the process towards data collection and management of European eel in the Mediterranean" (March 2023) held, engaging European eel fishers from beneficiary countries and serving as a model for future stakeholder	2) 0 x GFCM Mediterranean key species for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation	2) 4 x GFCM Mediterranean key species for which alternative management measures have been identified and evaluated, integrating socio-economic aspects and stakeholder evaluation		Alternative management measures, based on harvest control rules, integrating socioeconomic aspects and stakeholder evaluation, have been identified for Blackspot seabream <i>Pagellus bogaraveo</i> , resulting in the discussion of potential catch limits for the fishery in the Alboran Sea. Work is underway to develop a framework for data poor Management Strategy Evaluation (MSE) for an additional three species (deep-water red shrimp, round sardinella and blackspot seabream). A tiered framework has been endorsed and MSE-lite version piloted for blackspot sea bream, with continued development of a framework for other data-limited MSE (e.g. for blackspot sea bream, sardinella, dwrs)

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
			meetings to provide feedback on scientific work. Consultant contracted to begin preparations for an Ecosystem Approach to Fisheries Management (EAF) case study, advancing participatory/co-management principles.				
Output 1.3: Value chains modelled in view of identifying best practices and entry points for innovation, including the certification of select fisheries	3) Number of fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain	3) 0 x fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain		3) 2 x fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain	3) 7 x fisheries value chains addressed via studies, interventions, trainings or certification using gender-sensitive approaches that value the contribution of women along the value chain		Value chain work was delayed as the project awaited the SAC/GFCM annual session to decide on methodological approach to value chain data collection. The Commission approved, in November 2024, to proceed with developing a common regional data collection methodology. A workshop for methodology on value chain analysis data collection was held in June 2025 and the methodological approach reviewed and agreed by the GFCM Scientific Advisory Committee on Fisheries (SAC). Delays on regionally harmonised approach and training, and target of 7 VCs not realistic. Only 1 fisheries value chain (round sardinella) has been addressed up to the MTR. A study on lionfish, including interventions and trainings to encourage marketing and consumption of this new NIS (treated under Component 3), was also completed in southwest coast of Türkiye, although this does not appear to be progressed any further.
Output 1.4: Reinforced synergies with the private sector to support market-driven opportunities in the fisheries sector	4) Number of stakeholder organizations – including women’s organizations – having received capacity development support	4) 0 x stakeholder organizations – including women’s organizations – having received capacity development support	A common framework for gathering stakeholder information was prepared and work initiated to begin populating it. Over 30 organizations received capacity development support to develop market-based solutions for NIS via a dedicated SSF Forum workshop (21-23 Nov 2023, Gökova Bay, Türkiye)	4) 4 x stakeholder organizations – including women’s organizations – having received capacity development support	4) 8 x stakeholder organizations – including women’s organizations – having received capacity development support		Ongoing. End target achieved. 30 organizations have received capacity development support in relation to enhancing market-based solutions for non-indigenous species (SSF Forum workshop, 21-23 November 2023, Gökova Bay, Türkiye). However, questions remain regarding the inclusiveness of representation, particularly for women and less visible groups which is unclear and not clearly reported and the limited involvement of wider stakeholder groups, e.g. NGOs (although high interest) or direct involvement of private sector. Planned capacity needs assessments for SSF organisations under this output have not been carried out.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
Output 1.5: Participation in the regional network of SSF platforms reinforced in order to provide social protection support to its members	5) Number of countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	5) 0 x countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	Preparatory work underway towards the development of an actuarial study for the extension of social protection to fishers (Lebanon)	5) 0 x countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers	5) 3 x countries where initiatives promoted to improve social protection access for women and men small-scale fishers and fish workers		Initiatives promoted for social protection access in 0 countries but (Mid Term target is 0). However, GFCM-LEX profiles (see Component 2) are being updated to include a section on social protection-related legislation. Initially it was envisaged to support the development of an actuarial study for the extension of social protection to fishers in Lebanon however, in agreement with the Lebanese national focal point, the activity was canceled due to the potential unreliability of the information collected due to the current geopolitical situation.
Component 2: Enhanced integration of emerging monitoring, control and surveillance technologies in the fight against IUU fishing							
Output 2.1: Losses in national economies generated by IUU fishing activities assessed through the application of an ad hoc methodology at the country level	1) Number of countries for which an assessment is available	1) 0 countries for which an assessment is available	Preparatory work carried out to identify relevant partners and legal experts to support the collection and analysis of national legislation, including the recruitment of select national experts (e.g. Albania), as well as to establish a network of national stakeholders to support the assessment of IUU fishing activities	1) 4 x for which an assessment is available	1) 8 x for which an assessment is available		No assessment of the 'Losses in national economies generated by IUU fishing activities' undertaken in any of the participating countries. However, assessments of legislative gaps contributing to IUU fishing has been carried out in Albania, Algeria, Lebanon, Libya, Montenegro, Morocco, Tunisia and Türkiye. Activity is in collaboration with the sister FishEBM Black Sea project.
Output 2.2: Impacts of IUU fishing on main commercial marine living resources incorporated in stock assessments	2) Number of fisheries for which an IUU quantification is available	2) 0 fisheries for which an IUU quantification is available	Advances on this activity were put on hold, following the request of the GFCM Scientific Advisory Committee on Fisheries (SAC) to revisit the methodology. Liaison is underway with national experts in view of proposing a work plan to advance on this output.	2) 0 fisheries for which an IUU quantification is available	2) 2 fishery for which an IUU quantification is available		No agreement over common methodology to collect such data when project started so 0 fisheries for which an IUU quantification is available (unrealistic expectation). However, the activity was reformulated by the 2025 PSC, following the request from the GFCM Working Group to revisit the methodology. A revised concept note was produced and the new approach focusing on developing capacity to work with FAO IUU assessment methodologies emphasizing training. The contract for executing this activity was awarded in December 2025 (with work due to begin in Q1 2026).
Output 2.3: Information on legal frameworks relating to IUU fishing and fisheries crimes	3) Number of legislation- related documents in repository/databas e	3) 0 x legislation- related documents in repository/database	Coordination was carried out with relevant experts/partner organizations towards cooperation in the framework of the GFCM- Lex, including finalizing a	3) 25 x legislation- related documents in repository/ database	3) 50 x legislation- related documents in repository/ database		Some 100 GFCM-Lex profiles have been produced and work has progressed towards the publication of the GFCM-Lex online platform with IT tools procured, information migrated to platform, and workshops and training provided to participating countries (GFCM-LEX final workshop, 12-14 September 2025, Naples, Italy; Workshop on "Training toward strengthening national legislation in relation to

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
collected, analysed and disseminated, including through a regional repository			methodology and work plan to compile national legislations and related documents for select beneficiary countries as well as signing a relevant letter of agreement to conduct the work. It was decided to postpone the implementation of trainings with national authorities in order for the trainings to consider advances from other project activities. A bilateral meeting with UNODC was held.				GFCM recommendations ⁴⁷ held (October 2024), including dedicated session for reviewing national legislation and identifying gaps)
Output 2.4: Application of technology in the field of control and surveillance, including small-scale fishing, tested and tailored to the capacity of countries	4) Number of MCS system launched or solutions applied at country level	4) 0 x MCS systems launched, or solutions applied at country level	An assessment of MCS needs was carried out in Türkiye and roadmap developed towards upgrading Türkiye's VMS. VMS transponders potentially applicable to Türkiye's needs were acquired and preparatory work is underway to carry out a pilot study to assess the feasibility and performance of these transponders. A regional workshop on MCS tools for the Mediterranean was organized in April 2023)	4) 2 x MCS systems launched, or solutions applied at country level	4) 5 x MCS systems launched, or solutions applied at country level		Pilot of VMS technologies finalized in Montenegro and Albania, and hardware support provided to Türkiye for digital processing and data exchange facilitating MCS. Various MCS workshops have been held including one on MCS tools for the Mediterranean in coordination with Global Fishing Watch, and training on MCS new technology (e.g. drones), with visit to Spanish FMC and Guardia Civil for inspections at sea. There has also been some project support for assessing gear sensors and a gear sensor pilot study underway in Montenegro.
Output 2.5: International Plan of action to fight IUU and Regional Plan of Action to fight	5) Number of measures in place to mitigate the impacts of by-catch, discards and	5) 0 x measures in place to mitigate impacts of by-catch, discards and abandoned fishing gear	Experts identified. An assessment of the level of compliance with relevant GFCM decisions related to by-catch and the	5) 3 x measures in place to mitigate impacts of by-catch, discards and	5) 7 x measures in place to mitigate impacts of by-catch, discards and		The project has provided support to the development of National Plans of Action against IUU fishing (NPOA-IUU), including the development of a toolkit for the formulation of NPOA-IUU, based on the GFCM RPOA-IUU and regional standards, as well as existing NPOA-IUU available in FAO-LEX.

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
IUU implemented through national plan of actions, including measures to reduce bycatch and abandoned fishing gear	abandoned fishing gear.		marking of fishing gear was carried out.	abandoned fishing gear	abandoned fishing gear		Related to this, the project has supported an assessment of the status of fishing gear management at national level (e.g. practices in marking fishing gear, recycling of gear, port facilities, etc.), and production of well-received ALDFG awareness raising materials and has initiated an innovative pilot project in Morocco to work with local communities to retrieve ALDFG. Other project activities under this Output include bycatch mitigation trials in Türkiye and a discards monitoring programme in Albania.
Component 3: Integrated ecosystem-based management tools and ecosystem approach to biodiversity protection and sustainable fisheries							
Output 3.1: Area-based and innovative management tools identified and applied to reduce overexploitation of fisheries and enhance ecosystem productivity	1) Number of area-based or innovative management tools identified	1) 0 x area-based or innovative management tools identified	Participation of relevant experts was facilitated to the GFCM expert group on vulnerable marine ecosystems and essential fish habitats to advance discussions on a framework for the identification of priority areas for the establishment of new FRAs. A ROV survey was carried out in the Otranto Channel (GSA 18 – Southern Adriatic Sea) in view of assessing the presence of bamboo coral (<i>Isidella elongata</i>). In connection with Output 1.1 a socioeconomic survey of Albanian trawl vessels potentially fishing in the Otranto Channel was carried out in view of assessing the potential socioeconomic impacts of declaring a Fisheries Restricted Area (FRA) in the Otranto Channel.	1) 4 x area-based or innovative management tools identified	1) 8 x area-based or innovative management tools identified		4 management tools identified, supporting enhanced area-based and ecosystem-based conservation efforts. A Fisheries Restricted Area (FRA) for the Otranto Channel in the Adriatic Sea (Geographical Sub-area 18, Albania) was established and entered into force in April 2025, informed by work from the project (ROV survey to assess presence of <i>Isidella elongata</i> [bamboo coral] forests, socioeconomic assessment of potential impacts of the FRA and stakeholder consultation). The project has also undertaken additional work informing more holistic management (including the consideration of area-based management approaches) including a study in the Adriatic Sea to assess the impacts of underwater noise from trawl vessels and some interesting and innovative piloting of the eDNA metabarcoding for potential use in surveying vulnerable marine species.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
			Pilot project on underwater noise impacts of commercial trawl fisheries carried out in Albania Preparatory administrative work carried out to conduct fishery selectivity trials in Morocco (to be executed during the next reporting period).				
Output 3.2: Monitoring of good environmental status for commercial fisheries ensured and adaptation strategies to climate change formulated	2) Percent of data on commercial fisheries and incidentally caught vulnerable species integrated in IMAP based national monitoring plans of the Good Environmental Status of marine waters and marine ecosystem, in interested countries	2) 0 percent of data on commercial fisheries integrated into monitoring plans		2) 35 percent of data on commercial fisheries integrated into monitoring plans	2) 70 percent of data on commercial fisheries integrated into monitoring plans		There was confusion over which agency had responsibility for delivery of this output. This was identified as the responsibility of UNEP/MAP + SPA/RAC. However, since fisheries data collection falls under GFCM exclusive mandate, this activity was felt not to be relevant for SPA/RAC. Consequently, in consultation with GFCM, a revision of the activities under this Output has been proposed to better reflect the situation and foster collaboration between GFCM, UNEP/MAP, and SPA/RAC. The new proposed action (to be approved by the PSC) is to provide technical assistance to interested partner countries to improve their capacity for collecting data on incidentally caught vulnerable species.
	3) Number of developed Guidelines document for the integration in national monitoring plans of the contribution to the Good Environmental Status of marine waters and marine ecosystem by commercial fisheries data	3) 0 x Guidelines documents developed		3) 0 x Guidelines documents developed	3) 1 x Guidelines documents developed		A report on 'The identified relations between different Integrated Monitoring and Assessment Programme of the Mediterranean Sea and Coast and Related Assessment Criteria (IMAP) indicators: focus on interrelations with fisheries' has been published, and another report on the 'Comparative analysis of the GFCM and IMAP reporting frameworks related to the contribution of commercial fisheries and incidentally caught vulnerable species to Good Environmental Status' drafted and is under review. Guidelines have still to be developed.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	4) Number of national/local gender sensitive adaptation strategies or action plans to climate change in coastal areas formulated that respond to the different needs and priorities of women and men fishers and fish workers, and affected communities	4) 0 x gender sensitive adaptation strategies or action plans to climate change in coastal areas formulated so as to respond to the different needs and priorities of women and men fishers and fish workers, and affected communities		4) 2 x gender sensitive adaptation strategies or action plans to climate change in coastal areas formulated so as to respond to the different needs and priorities of women and men fishers and fish workers, and affected communities	4) 5 x gender sensitive adaptation strategies or action plans to climate change in coastal areas formulated so as to respond to the different needs and priorities of women and men fishers and fish workers, and affected communities		Delivery of this output is behind schedule due to delays in signing the project cooperation agreement between UNEP-MAP/SPA/RAC and thus mid-term targets have not been achieved. Work was to be started after finalization of the regional document on the state of the art of national/local climate change adaptation strategies in coastal areas and the organization of a joint regional training workshop to introduce and support the utilization of this regional document (November 2025). However, in the MTR's view no national CCA strategy can be developed and endorsed by SPA/RAC before the end of the project, especially as the fisheries element has not involved either GFCM or the fisheries NFPs in any significant way.
Output 3.3: Measures identified to cope with the negative effects of non-indigenous species on commercial fisheries and those of other potential stressors)	5) Number of measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors on biodiversity and marine ecosystems	5) 0 x measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors on biodiversity and marine ecosystems	NIS experts identified to support NIS monitoring and assessment programmes and NIS data management. LoAs for NIS data management with concerned countries are under preparation.	5) 2 x measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors on biodiversity and marine ecosystems	5) 4 x measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors on biodiversity and marine ecosystems		9 'measures' have been developed but to date it is unclear whether they have been applied. A regional workshop on the identification and introduction of appropriate measures for the reduction of new introductions and for eradication/control of NIS in priority sites was held on 23 January 2025 (Rome, Italy) with the participation of 16 countries (of which 7 are project beneficiary countries), and a guideline document has been developed and published. In terms of 'other potential stressors on biodiversity and marine ecosystems', a set of guidelines on reducing and managing solid waste discharge from fishing boats in the Mediterranean region has been developed, although with little input from GFCM or fisheries NFPs.
Output 3.4: Training programmes and case studies to strengthen national capacity towards the development of fisheries tenure interventions	6) Number of countries with an equal representation of men and women participating in regional training programmes and/or case studies on fisheries tenure	6) 0 x countries participating in regional training programmes and/or case studies on fisheries tenure	A dedicated workshop on fisheries tenure was held in the context of the GFCM Working Group on Small-Scale Fisheries (WGSSF) (20-21 March 2024), where the role of tenure rights in the context of advancing good participatory management practices for SSF was discussed by participants.	6) 0 x countries participating in regional training programmes and/or case studies on fisheries tenure	6). 8 x countries participating in regional training programmes and/or case studies on fisheries tenure		A dedicated workshop on fisheries tenure was held in the context of the GFCM Working Group on Small-Scale Fisheries (WGSSF) (20-21 March 2024), where the role of tenure rights in the context of advancing good participatory management practices for SSF was discussed by participants.

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
Component 4: Innovative blue economy solutions accounting for the fishery sector							
Output 4.1 Analysis carried out on how the fishery sector can mobilize investments, including in diversification of livelihoods (e.g. aquaculture planning, pescatourism), against the background of marine spatial planning	1) Number of mobilized investments identified in context of marine spatial planning	1) 0 x mobilized investments identified in context of marine spatial planning	Methodology prepared for collecting information about good practices and disseminating the information via a standardized approach. Further advances are foreseen at latter stages of the project after technical activities begin producing results.	1) 2 x mobilized investments identified in context of marine spatial planning	1) 5 x mobilized investments identified in context of marine spatial planning		No new investments have been identified and mobilized in the context of marine spatial planning by the project. Methodology prepared for collecting information about good practices and disseminating the information via a standardized approach. Further advances are foreseen at latter stages of the project, although what investment is needed/where/how much/and by whom has not been identified and it is unlikely that any specific new investment will be mobilized by the end of the project.
Output 4.2 Factsheets on successful innovative solutions for the fishery sector and sustainable use of marine ecosystem services prepared in view of attracting blue economy related investments	2) Number of fact sheets/communications materials with information on innovative gender sensitive opportunities for the blue economy-related investment	2) 0 x fact sheets/communications materials with information on innovative gender sensitive opportunities for the blue economy-related investment	Collaboration established via a Letter of Agreement (LOA) with Akdeniz Koruma Derneği, an NGO partner, for the implementation of "NIS uplifting the Blue Economy" action to develop market-based solutions for non-indigenous species. In the context of this action, a dedicated SSF Forum event on "NIS: from health and safety to marketing opportunities" (21-23 Nov 2023, Akyaka, Gökova bay, Türkiye) to share best practices among small-scale fishers for developing new markets for NIS. Work carried out to start populating a database of key stakeholders.	2) 2 x fact sheets/communications materials with information on innovative gender sensitive opportunities for the blue economy-related investment	2) 4 x fact sheets/communications materials with information on innovative gender sensitive opportunities for the blue economy-related investment		Only one communication material produced on market-based solutions to non-indigenous species by MTR. Publication of the factsheets is foreseen in the next reporting period.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
Output 4.3 Endorsed pilot NAP+ with investment plan(s) tested in at least one country	3) Number of countries with endorsed pilot NAP+ with investment plan(s) tested	3) 0 x countries with endorsed pilot NAP+ with investment plan(s) tested		3) 0 x countries with endorsed pilot NAP+ with investment plan(s) tested	3) 1 x countries with endorsed pilot NAP+ with investment plan(s) tested		No countries have endorsed (or even developed a draft) NAP+ and investment plan. There is considerable confusion over this Output. An online meeting to present a concept on the NAP+ was held with Montenegrin Focal Points (Environment and fisheries) in November 2024. However, MTR interviews revealed a lack of understanding and/or confusion with other 'action plans' (e.g. NBSAP). There is some interest from other countries. Nevertheless, preparatory work has been completed and some of the concerned stakeholder groups begun to be engaged. Other countries - Libya, Morocco, Tunisia - have expressed an interest in addressing some of the issues within their ongoing processes to develop their own blue economy strategies and plans.
	4) Number of Regional Guidelines document for the preparation of a NAP+ drafted	4) 0 x Regional Guidelines document for the preparation of a NAP+ drafted	Terms of Reference under development for national Blue Economy consultant(s) to identify the blue economy sectors potentialities and possible constraints, in Montenegro and other interested countries.	4) 0 x Regional Guidelines document for the preparation of a NAP+ drafted	4) 4 x Regional Guidelines document for the preparation of a NAP+ drafted		No regional guidelines yet developed and indeed can only be developed after the NAP+ (in whatever form) has been developed, as no NAP+ exists as there is no experience to draw on to capture in 'guidelines'. Work to be started after finalization of the NAP+ in Montenegro, but 'regional experts' have been hired to assist the process in Montenegro, Tunisia, Morocco and Libya and draft the regional guidelines document for the preparation of a NAP+
Output 4.4 New partnerships implemented through the NAP+, enabling the participation of the private sector in blue economy	5) Number of actors participating in new governance partnerships and percentage of actors representing or represented by women	5) 0 x actors participating in new governance partnerships		5) 5 x actors participating in new governance partnerships and 25% of actors representing or represented by women	5) 10 x actors participating in new governance partnerships and 25% of actors representing or represented by women		No new partnerships have been implemented through a NAP+ as no NAP+ have been developed yet.
Component 5: Knowledge management and outscaling							
Output 5.1: Initiatives promoted to support countries in encouraging strategic investment enabling, among others, public	1) Number of national FishEBM Med/Post 2020 SAPBIO stakeholders platform established and number of public and private actors involved in each platform	1) 0 x platforms established and 0 x actors involved	Preparatory work carried out towards recruiting Fisheries and blue economy experts (NAP+) to support the establishment of new national/local partnership enabling the participation of the fisheries sector to the Blue Economy and the establishing national	1) 3 platforms established and 4 actors involved in each platform and 25% of actors representing or represented by women	1) 6 platforms established and 4 actors involved in each platform and 25% of actors representing or represented by women		Only one platform established. A national platform was launched during the September 2025 MedProgramme Outreach Meeting in Tunis. The process is ongoing in Montenegro.

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
and private partnerships			FishEBM Med stakeholder platforms is underway.				
Output 5.2 Lessons learnt, and best practices disseminated to showcase the benefits of the concerted GFCM-MAP approach in aligning different national and regional priorities	2) Number of awareness raising communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.	2) 0 x awareness raising gender sensitive communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.	In line with the knowledge management strategy, which was developed and approved by PSC, dedicated news pieces and project stories were submitted to IW Learn bulletin and disseminated via relevant social media channels	2) 12 x awareness raising gender sensitive communication pieces presented in regional and global fora on the objectives, progress and accomplishment s of the GFCM-MAP approach.	2) 24 x awareness raising gender sensitive communication pieces presented in regional and global fora on the objectives, progress and accomplishments of the GFCM-MAP approach.		Ongoing. At the MTR point there were 72 awareness raising communication pieces presented in regional and global fora on objectives, progress and accomplishments of the GFCM-MAP approach. This included: • 48 social media posts (LinkedIn, X, Facebook) • 23 webnews (FAO, GFCM, IWlearn webpages) • 1 publication These communication efforts demonstrate attempts to raise visibility of project activities and results. However, communication materials specifically dedicated to explaining the project itself was limited at the beginning of implementation. Stakeholders revealed inconsistencies in the understanding of the project's overall objectives and results indicating a lack of a shared and common understanding of the project's purpose. Also, confusion persists between activities conducted under the FishEBM Med project and those under the MedSea4Fish programme. In addition, some knowledge products display the MedSea4Fish branding with limited or no reference to the FishEBM Mediterranean project, which further dilutes the project's identity and visibility.
Output 5.3 Outreach & communication strategy developed and implemented, including coordination and awareness-raising meetings with co-financing partners and participation in relevant global GEF-related fora	3) Number of gender sensitive outreach and communication action plans developed and under implementation	3. 0 x gender sensitive outreach and communication action plan developed and under implementation	Following the onboarding of a KM specialist, the knowledge management and communication strategy was developed and was approved by the PSC in early 2024. In this context, a visual ID for the project has been prepared	3. 1 x gender sensitive outreach and communication action plan developed and under implementation	3. 1 x gender sensitive outreach and communication action plan developed and under implementation		KMC Strategy and plan - is intended to guide the generation, dissemination, and uptake of knowledge produced. – has been developed and is under implementation. However, the strategy remains largely conceptual, lacks sufficient operational detail to effectively guide implementation, lacks clearly defining roles and responsibilities, resource allocation, or monitoring activities. It also does not clearly specify which knowledge products are intended for which users and for what purpose. It needs to be revised.
	4) Number of gender sensitive information and communication items available through the knowledge sharing platform	4) 0 x gender sensitive information and communication items available through the knowledge sharing platform	Dissemination of the flyer in order to present the project to SPA/RAC Focal Points	4) 20 x gender sensitive information and communication items available through the knowledge sharing platform	4) 50 x gender sensitive information and communication items available through the knowledge sharing platform		There have been delays over the use of the UNEP/MAP's MedProgramme Knowledge Management Platform by the project. Only 5 information and communication items on the project available through the platform up to MTR point, and although it includes references to the FishEBM Mediterranean project, it does not provide comprehensive or up-to-date information on results from SPA/RAC and GFCM activities. (The PPR 2025 provides a list of communication items supposedly available in the MedProgramme knowledge management platform. However, these are published in UNEP or IWlearn websites).

Mid Term Review of the FishEBM Mediterranean Project

Results chain	Indicators	Baseline	Level at PIR 2023-2024 ⁴⁵	Mid-term target	End-of- project target	Mid-term assessment ⁴⁶	Justification for rating & Achievement rating ⁴⁷ (based on latest data from PPR 2025 and MTR interviews)
	5) Number of meetings attended at the regional and global level as relevant to the attainment of GEF objectives	5) 0 x meetings attended at the regional and global level as relevant to the attainment of GEF objectives	GFCM and MAP staff participated in the 22nd and 23rd GEF Large Marine Ecosystems Consultation Meeting (France, July 2023/June 2024) to disseminate lessons learned from the project, as well as the 46th session of the GFCM (Croatia, November 2023) and the World Fisheries Congress (USA, March 2024)	5) 7 x meetings attended at the regional and global level as relevant to the attainment of GEF objectives	5) 15 x meetings attended at the regional and global level as relevant to the attainment of GEF objectives		Ongoing. To date, 18 regional and global meetings attended to disseminate project outcomes and lessons learned. To disseminate project outcomes, the GFCM and SPA/RAC participated in several regional and global knowledge-sharing events during the reporting period. These include the 22nd Large Marine Ecosystems Consultation Meeting (LME22, July 2023), 46th annual session of the GFCM (November 2023), the World Fisheries Congress (March 2024), the 23rd Large Marine Ecosystems Consultation Meeting (LME23, June 2024), the 10th GEF International Waters Conference (IWC10, September 2024), the 4th meeting of the SOI Global Dialogue (October 2024), 47th annual session of the GFCM (November 2024); Workshop to discuss and identify the appropriate measures for the reduction of new introductions and for eradication/control of NIS (January 2025), Meeting of the Ecosystem Approach Correspondence Group on Monitoring (CORMON) Biodiversity and Fisheries (April 2025), the MedProgramme ASM (April 2025), 11th Meeting of the Post-2020 SAPBIO National Correspondents (April 2025), the 24th Large Marine Ecosystems Consultation Meeting (LME24, May 2025), 17th meeting of SPA/BD Focal Points (May 2025), the UN Oceans Conference (June 2025), 12th meeting of EcAP Coordination Group (September 2025), Meeting of the MAP Focal Points (September 2025), the 48th annual session of the GFCM (November 2025) and the launch of the 2025 edition of SoMFi (November 2025). However, while participation in such events has supported external visibility and learning within the International Waters community, non were organised by GFCM and SPA/RAC together. Also, evidence of how these exchanges have been systematically captured and translated into project learning or operational improvements remains limited. Opportunities to consolidate lessons learned and facilitate knowledge sharing across countries is limited.

Annex 7. Co-financing table (data received 30 July 2025)

Sources of co-financing ⁴⁸	Name of co-financer	Type of co-financing ⁴⁹	Amount confirmed at CEO endorsement/ approval ⁵⁰	Actual amount materialized as of June 2025	Actual amount materialized at mid-term	Expected total disbursement by the end of the project	Comments
Recipient country government	Albania	Public investment	1,500,000.00	-	-	1,500,000.00	Did not respond to request for information on their contribution
Recipient country government	Albania	In-kind	4,522,757.00	-	-	4,522,757.00	Did not respond to request for information on their contribution
Private sector	Catapult CX	In-kind	11,150,000.00	-	-	-	Co-financier identified at CEO endorsement no longer involved in project
Other	CBD Secretariat	In-kind	1,650,000.00	-	-	412,500.00	Did not respond to request for information on their contribution
Other	CIHEAM Bari	Grant	13,678,937.00	13,678,937.17	13,678,937.17	13,678,937.17	
Other	CIHEAM Bari	In-kind	2,400,000.00	2,400,000.00	2,400,000.00	2,400,000.00	
Private sector	CLS	Grant	27,000.00	-	-	-	Co-financier identified at CEO endorsement no longer involved in project
Private sector	CLS	In-kind	37,200.00	215,500.00	215,500.00	215,500.00	
Other	CNRS	Grant	125,000.00	-	-	125,000.00	Did not respond to request for information on their contribution
Other	COMHAFAT	In-kind	1,300,000.00	-	-	-	Co-financier identified at CEO endorsement no longer involved in project
Other	GFCM	In-kind	4,000,000.00	2,688,815.00	2,688,815.00	4,000,000.00	
Other	GFCM	Grant	6,000,000.00	3,731,939.00	3,731,939.00	6,000,000.00	
Other	Global Fishing Watch	In-kind	2,300,000.00	2,300,000.00	2,300,000.00	2,300,000.00	
Others	IUCN	Grant	1,633,340.77	1,225,000.00	1,225,000.00	1,633,340.77	
Beneficiaries	Libya	In-kind	500,000.00	5,000.00	5,000.00	5,000.00	

⁴⁸ Sources of Co-financing may include: Bilateral Aid Agency(ies), Foundation, GEF Agency, Local Government, National Government, Civil Society Organization, Other Multi-lateral Agency(ies), Private Sector, Beneficiaries, Other.

⁴⁹ Grants, loans, equity participation by beneficiaries (individuals) in the form of cash, guarantees, in kind or material contributions and other (please explain).

⁵⁰ The type of co-financing whether cash or in-kind should be indicated separately

Mid Term Review of the FishEBM Mediterranean Project

Sources of co-financing ⁴⁸	Name of co-financer	Type of co-financing ⁴⁹	Amount confirmed at CEO endorsement/ approval ⁵⁰	Actual amount materialized as of June 2025	Actual amount materialized at mid-term	Expected total disbursement by the end of the project	Comments
Private sector	MetOcean Telematics	In-kind	105,400.00	-	-	-	<i>Co-financier identified at CEO endorsement no longer involved in project</i>
Recipient Country Government	Montenegro	Public Investment	1,500,000.00	2,461,096.28	2,461,096.28	2,461,096.28	
Recipient Country Government	Morocco	In-kind	10,048,434.00	143,678.16	143,678.16	10,048,434.00	<i>Did not respond to request for information on their contribution</i>
Other	SPNI	In-kind	1,008,000.00	-	-	-	<i>Co-financier identified at CEO endorsement no longer involved in project</i>
Private sector	Studio Lasso d.o.o	In-kind	195,000.00	-	-	40,000.00	<i>Did not respond to request for information on their contribution</i>
Recipient Country Government	Türkiye	Public Investment	2,000,000.00	1,525,000.00	1,525,000.00	2,000,000.00	
Other	UNEP/MAP	In-kind	1,779,115.00	3,567,493.00	3,567,493.00	1,779,115.00	
Other	University of Alicante	In-kind	800,000.00	800,000.00	800,000.00	800,000.00	
Other	WWF MMI	Grant	3,767,470.00	1,799,369.00	1,799,369.00	3,767,470.00	
TOTAL			72,027,654	36,541,828	36,541,828	57,689,150	

Annex 8. Notes on MTR ratings and achievements summary table**Notes on GEF evaluation criteria rating table**

The MTR team is required to rate the above MTR criteria for the purposes of reporting to GEF and FAO on progress to date. Most criteria will be 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 and the likelihood of impact are rated from **likely (L)** down to **highly unlikely (HU)**.

Overall outcome ratings

MTRs should use mid-term targets per the project's log frame to assess outcome delivery. If no mid-term indicator targets are available, the MTR should base outcome ratings on an assessment of the delivery of results to date against milestones in workplans and delivery compared with end-of-project targets.

Table: A8.1 : How to assess ratings for specific criteria

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

Source: GEF (2017c)

In line with similar guidance on the assessment of ratings for GEF evaluations (GEF, 2017c), the overall rating of the outcomes of the project should be based on performance on the criteria of relevance, effectiveness and efficiency. The calculation of the overall outcome rating will consider all three criteria, of which relevance and effectiveness are critical. The relevance rating will determine whether the overall outcome rating is in the unsatisfactory range (MU to HU = unsatisfactory range). If the relevance rating is unsatisfactory, the overall outcome will be unsatisfactory as well. However, where the relevance rating is satisfactory (HS to MS), the overall outcome rating could, depending on its effectiveness and efficiency rating, be either satisfactory or unsatisfactory.

Table A8.2 Factors affecting performance (assess each element separately; M&E is treated differently)

Rating	Description
Highly satisfactory (HS)	There were no shortcomings and quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder engagement/communication and knowledge management and results exceeded expectations.
Satisfactory (S)	There were no or minor shortcomings and quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder engagement/communication and knowledge management and results meet expectations.
Moderately satisfactory (MS)	There were some shortcomings and quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder

	engagement/communication and knowledge management and results more or less meet expectations.
Moderately unsatisfactory (MU)	There were significant shortcomings and quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder engagement/communication and knowledge management and results were somewhat lower than expected.
Unsatisfactory (U)	There were major shortcomings and quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder engagement/communication and knowledge management and results were substantially lower than expected.
Highly unsatisfactory (HU)	There were severe shortcomings in quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder engagement/communication and knowledge management.
Unable to assess (UA)	The available information does not allow an assessment of the quality of design and readiness/project implementation/project execution/co-financing/partnerships and stakeholder engagement/communication and knowledge management.

Table A8.3 Monitoring and evaluation design or implementation ratings (*Overall M&E design, design and implementation assessed separately*)

Rating	Description
Highly satisfactory (HS)	There were no shortcomings and quality of M&E design or M&E implementation exceeded expectations.
Satisfactory (S)	There were no or minor shortcomings and quality of M&E design or M&E implementation meets expectations.
Moderately satisfactory (MS)	There were some shortcomings and quality of M&E design or M&E implementation more or less meets expectations.
Moderately unsatisfactory (MU)	There were significant shortcomings and quality of M&E design or M&E implementation somewhat lower than expected.
Unsatisfactory (U)	There were major shortcomings and quality of M&E design or M&E implementation substantially lower than expected.
Highly unsatisfactory (HU)	There were severe shortcomings in M&E design or M&E implementation.
Unable to assess (UA)	The available information does not allow an assessment of the quality of M&E design or M&E implementation.

Table A8.4 Sustainability

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

Annex 9. Suggested reformulation for GCP Results Framework

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
Project Objective: to reverse the overexploitation of select commercial living marine resources of Mediterranean countries in support of their blue economy development pathway.	1) Number of hectares of Marine Protected Areas (MPAs), fisheries restricted areas (FRAs) and/or other effective area-based conservation measures (OECMs) created or under improved management for conservation and sustainable use	1) 0 hectares of Marine Protected Areas (MPAs), fisheries restricted areas (FRAs) and/or other effective area-based conservation measures (OECMs) created or under improved management for conservation and sustainable use	1) 270,200 hectares of Marine Protected Areas (MPAs), fisheries restricted areas (FRAs) and/or other effective area-based conservation measures (OECMs) created or under improved management for conservation and sustainable use	1) 270,200 hectares of Marine Protected Areas (MPAs), fisheries restricted areas (FRAs) and/or other effective area-based conservation measures (OECMs) created or under improved management for conservation and sustainable use	Government statistics RFB reports Project reports Project reports Gender assessment report SoMFi Report	Sustained political support from countries throughout the project Adaptive management plans are implemented efficiently and are capable to address changes internal or external to the fishery	Government agencies International/regional Executing Agencies and Implementing Agency
	2) Landings from fisheries under sustainable management	2) 27 000 tonnes of landings from fisheries under sustainable management	2) 100 000 tonnes of landings from fisheries under sustainable management or currently sustainable.	2) 180 000 landings from fisheries under sustainable management or currently sustainable.			
	3) Percentage of relevant ⁵¹ Mediterranean priority stocks whose stock status has improved over the course of the project	3) 0% of relevant Mediterranean priority stocks	3) 41% of relevant Mediterranean priority stocks whose stock status has improved over the course of the project.	3) At least 50% of relevant Mediterranean priority stocks whose stock status has improved over the course of the project.			
	3) Number of countries having improved data on fisheries-dependent employment, disaggregated by gender, along the value chain	3) 8 countries with fisheries-dependent employment data	3) 8 countries with gender disaggregated fisheries-dependent employment data	3) 8 countries with gender disaggregated fisheries-dependent employment data			
Component 1: Strengthened capacity to manage commercial fisheries, with particular focus on SSF.							

⁵¹ Species found in the Geographical Subareas (GSAs) corresponding to the project beneficiary countries.

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
Outcome 1 Fisheries managers and stakeholders use sound information generated on the status of key commercial fisheries to support improved management and selected value chain interventions, particularly for SSF, in view of maximizing production sustainability	1) Number of pieces of robust advice ⁵² containing enhanced information for fisheries management endorsed by the GFCM's Scientific Advisory Committee on Fisheries (SAC)	1) 0 pieces of robust advice containing enhanced information for fisheries management endorsed by the GFCM's Scientific Advisory Committee on Fisheries (SAC)	1) 36 pieces of robust advice containing enhanced information for fisheries management endorsed by the GFCM's Scientific Advisory Committee on Fisheries (SAC)	1) At least 50 pieces of robust advice containing enhanced information for fisheries management endorsed by the GFCM's Scientific Advisory Committee on Fisheries (SAC)	GFCM annual session or statutory body reports Project progress reports Project evaluations Project training reports National policies Management Plans Project reviews Reports of meetings, workshops and trainings Technical elements for management	Engagement of relevant fisheries managers and female and male stakeholders is sustained throughout the project Relevant fisheries managers and female and male stakeholders are properly/timely informed about the availability of sound information generated though the project. For 2: Data are provided by countries as required	Government agencies International/ regional Executing Agencies and Implementing Agency
	2) Number of countries with increased information from fisher-stakeholders feeding into management processes	2) 0 countries with increased information from fisher-stakeholders feeding into management processes	2) 7 countries with increased information from fisher-stakeholders feeding into management processes	2) At least 7 countries with increased information from fisher-stakeholders feeding into management processes			
Output 1.1: Regional data collection and analysis required to strengthen fisheries management increased, including collection of socioeconomic data Indicator: Number of countries where data collection campaigns/surveys have been carried out to collect biological data and/or gender-disaggregated socioeconomic data (Target = 7) Activities: 1.1.1 Socioeconomic data collection, including capturing the contribution of women to fish harvesting 1.1.2 Implementation of surveys-at-sea in relevant countries 1.1.3 Stock assessment capacity development							
Output 1.2: New approaches developed for the identification of fisheries management plans and measures, including for SSF Indicator: Number of new approaches endorsed for the identification of management measures integrating socioeconomic aspects and stakeholder evaluation (Target = 2) Activities: 1.2.1 Identification of priority coastal species							

⁵² In the context of the GFCM's Scientific Advisory Committee on Fisheries (SAC), 'advice' refers to comprehensive, science-based recommendations, developed through rigorous analysis and review by national experts from GFCM countries. 'Advice' typically includes stock assessments (e.g. evaluations of the status of populations of marine resources, including biomass, fishing mortality, and trends over time), proposals for management measures (e.g. catch limits, effort controls, gear restrictions, spatial/temporal closures, etc.), socioeconomic considerations (e.g. insights on how proposed measures may affect fishing communities and economies), aspects related to the ecosystem, habitat and vulnerable species (e.g. identification and protection of vulnerable marine ecosystems and essential fish habitats as well as mitigation of impacts on vulnerable species groups) and/or suggestions for improving data quality and research. Advice is a critical point in the GFCM's [fisheries advisory process](#), representing the culmination of the scientific-technical work on a given topic, and is intended to guide political decision-making for the conservation and sustainable use of marine resources in the GFCM area of application, thus directly supporting the adoption of binding recommendations and non-binding resolutions.

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
<i>1.2.2 Management Strategy Evaluation (MSE) framework, including for data-poor contexts</i> <i>1.2.3 Strategic guidance for SSF participatory management</i> Output 1.3: Value chain data collection, analysis and modelling improved and integrated in the fisheries management advisory process Indicator: Number of fisheries value chains addressed via studies using gender-sensitive approaches that value the contribution of women along the value chain (Target = 3) Activities: <i>1.3.1 Development of a regional value chain data collection methodology</i> <i>1.3.2 Value chain pilot studies</i> Output 1.4: Increased participation of stakeholders (including private sector) in the fisheries management process to support effective fisheries management advice and implementation of management measures Indicator: Number of stakeholder organizations – including women’s organizations – having engaged in fisheries management processes (Target = 50) Activities: <i>1.4.1 Development of a regional stakeholder engagement framework supporting the fisheries advisory process</i> <i>1.4.2 Stakeholder consultations on technical/scientific work and awareness raising supporting the implementation of management measures</i> Output 1.5: Good practices identified for promoting socially sustainable fisheries, including through social protection coverage Indicator: Number of background documents prepared identifying good practices for improving gender-responsive and meaningful social protection coverage among women and men small-scale fishers and fish workers within a select fishery (Target = 1) Activities: <i>1.5.1 SWOT analysis of socially sustainable blue crab fisheries</i>							
Component 2: Enhanced integration of emerging monitoring, control and surveillance technologies in the fight against IUU fishing							
Outcome 2 Fisheries management better accounts for the quantity and magnitude of IUU fishing in the Mediterranean Sea and incorporates control measures, including through the use of emerging technologies	1) Number of countries where enhanced normative (legislative and/or policy) frameworks to combat IUU fishing have been drafted, submitted for approval and then endorsed at national level	1) 0 countries where enhanced normative (legislative and/or policy) frameworks to combat IUU fishing have been drafted, submitted for approval and then endorsed at national level	1) 0 countries where enhanced normative (legislative and/or policy) frameworks to combat IUU fishing have been drafted, submitted for approval and then endorsed at national level	1) 2 countries where enhanced normative (legislative and/or policy) frameworks to combat IUU fishing have been drafted, submitted for approval and then endorsed at national level	Project progress reports Project evaluations Project training reports National policies / regulations Stock Assessment reports Regional strategies Project reviews	Relevant fisheries managers and female and male stakeholders are properly/timely informed about the quantity and magnitude of IUU fishing in the Mediterranean Sea Relevant fisheries managers and female and male stakeholders accept incorporating control measures, including with	Government agencies Implementation partners
	2) Number of countries with improved Monitoring, Control and Surveillance (MCS) tools to combat IUU fishing adopted by national fisheries agencies	2) 0 countries with improved Monitoring, Control and Surveillance (MCS) tools to combat IUU fishing adopted by national fisheries agencies	2) 0 countries with improved Monitoring, Control and Surveillance (MCS) tools to combat IUU fishing adopted by national fisheries agencies	2) 2 countries with improved Monitoring, Control and Surveillance (MCS) tools to combat IUU fishing adopted by national fisheries agencies			

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
						emerging technologies.	
Output 2.1: National authorities trained on IUU fishing assessment methodologies Indicator: Number of national representatives participating in IUU assessment trainings and demonstrating increased knowledge (Target = 12) Activities: 2.1.1 IUU assessment capacity development Output 2.2: Information on legal frameworks relating to IUU fishing and fisheries crimes collected, analyzed and disseminated, including through a regional repository. Indicator: Number of legislation-related documents within repository/database (Target = At least 115) Activities: 2.2.1 Retrieve, collect, analyse and disseminate national legislation related to fisheries management in the scope of an online Regional Repository (GFCM Lex) 2.2.2 Support national authorities on strengthening national legislation, including addressing fisheries crime Output 2.3: Monitoring, Control and Surveillance technology tested and tailored to the capacity of countries Indicator: Number of MCS solutions trialed at country level (Target = 8) Activities: 2.3.1 Streamline the identification and deployment of tracking devices (e.g. VMS, gear sensors, etc.) in line with regional standards in place while bearing in mind the specificities of respective national fleets and related priorities, including for SSF 2.3.2 Conduct a background study on the use of maritime domain awareness technology for performing IUU risk analysis 2.3.3 Organization of technical trainings on MCS and related technologies addressing key personnel of relevant fisheries control institutions Output 2.4: Implementation of International Plan of Action to fight IUU and Regional Plan of Action to fight IUU facilitated through the development of National Plans of Action to fight IUU (NPOA-IUU), also supporting provisions to address unreported and unregulated fishing from bycatch, discards and abandoned fishing gear Indicator: Number of national administration representatives engaged in NPOA-IUU trainings (Target = 15) Activities: 2.4.1 Combat abandoned fishing gear by supporting awareness and understanding of the GFCM recommendation on gear marking 2.4.2 Facilitate normative work to address unregulated and unreported fishing by improving knowledge on bycatch and discarding activities 2.4.3 Support countries in drafting national plans of action for the fight against IUU fishing							
Component 3: Integrated ecosystem-based management tools and ecosystem approach to biodiversity protection and sustainable fisheries.							
Outcome 3 Healthier marine ecosystems with more productive fisheries in place, through the synergistic application of ecosystem-based conservation/management tools and improvements	1) Number of spatial management measures adopted through an EBFM process to protect vulnerable marine ecosystems	1) 0 spatial management measures adopted through an EBFM process to protect vulnerable marine ecosystems	1) 1 spatial management measure adopted through an EBFM process to protect vulnerable marine ecosystems	1) 1 spatial management measure adopted through an EBFM process to protect vulnerable marine ecosystems	Toolboxes of management measures Area-based or innovative technical elements for management Monitoring plans Environment reports	Relevant fishery governance mechanisms are willing to use productive fisheries ecosystem-based conservation/management tools throughout the project	Government agencies Implementation partners Regional fisheries and environment agencies
	2) Number of novel approaches for ecosystem-based management (e.g. application of EBFM approach for management of sensitive habitats, eDNA metabarcoding, underwater	2) 0 novel approaches for ecosystem-based management endorsed by the GFCM's SAC and/or the UNEP-MAP's CORMON or SPA/BD Focal Points meetings	2) At least 2 novel approaches for ecosystem-based management endorsed by the GFCM's SAC and/or the UNEP-MAP's CORMON or SPA/BD Focal Points meetings	2) At least 5 novel approaches for ecosystem-based management endorsed by the GFCM's SAC and/or the UNEP-MAP's CORMON or SPA/BD Focal Points meetings			

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
in fisheries tenure governance	noise considerations, marine litter, NIS management, selectivity innovations, etc.) endorsed by the GFCM's Scientific Advisory Committee on Fisheries (SAC) and/or the UNEP-MAP's Meeting of the Ecosystem Approach Correspondence Group on Monitoring (CORMON) Biodiversity and Fisheries or the SPA/BD Focal Points Meeting				Adaptation strategies Project progress reports Project evaluations Working group reports		
Output 3.1: Protection of vulnerable marine ecosystems supported through the identification and application of area-based management tools for fisheries <u>Indicator:</u> Number of trials and/or pilot studies conducted to identify area-based management tools and/or essential fish habitats (Target = At least 3) <u>Activities:</u> 3.1.1 Identification of vulnerable marine ecosystems, facilitating technical elements for appropriate area-based management measures 3.1.2 Trial eDNA metabarcoding to inform the development of a standardised protocol for its use in assessing catch composition and understanding interactions between fisheries, vulnerable marine ecosystems, and vulnerable species Output 3.2: Common areas of interest between environment and fisheries identified and guiding documents developed to support coherence and progress toward Good Environmental Status (GES) in the Mediterranean <u>Indicator:</u> Number of guiding documents developed to support coordination and coherence between environment and fisheries administrations on areas of common interest (Target = 1) <u>Activities:</u> 3.2.1 Interlinkages between fisheries data and environment (i.e. IMAP) indicators identified and alignment between GFCM and UNEP-MAP reporting frameworks for fisheries and vulnerable species enhanced 3.2.2 Joint regional workshop to present the regional document defining common areas of interest and coordination among representatives from fisheries and environment administrations to foster dialogue and cooperation on shared issues. 3.2.3 Capacity building workshop on the GFCM-IMAP reporting framework for data collection, data management and identification of vulnerable species Output 3.3: Measures identified to cope with the negative effects of non-indigenous species on biodiversity, as well as to support climate change adaptation and mitigation <u>Indicator:</u> Number of measures developed and disseminated to mitigate the negative impacts of non-indigenous species and other potential stressors on biodiversity and marine ecosystems (Target = 9) <u>Activities:</u> 3.3.1 Update/elaborate monitoring programmes, identify national lists of NIS/IAS and their pathways of introduction in project countries, and identify which species should be used for monitoring 3.3.2 Support in identifying appropriate measures to reduce new NIS introductions and to manage or eradicate NIS in priority sites 3.3.3 Training on sharing data on NIS/IAS through the georeferenced online platform MAMIAS 3.3.4 Produce a regional synthesis of existing national and local climate change adaptation strategies for coastal areas in the Mediterranean, including fisheries communities, support its uptake through a regional training workshop, and facilitate integration of climate risk adaptation within the NAP+ Output 3.4: Innovative approaches developed and trialed to mitigate the negative interactions of fisheries with the marine environment <u>Indicator:</u> Number of studies, technical trials and/or guidance documents produced to improve fisheries' interactions with the marine environment (Target = 4) <u>Activities:</u> 3.4.1 Trial gear modifications to support the development of new approaches for improving fishing gear selectivity							

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
<i>3.4.2 Evaluate the impact of underwater noise from bottom trawlers and other vessel types, contributing to ongoing global discussions on noise-mitigation approaches</i> <i>3.4.3 Pilot innovations in ‘fishing for litter’ gear as an approach to enhance the contribution of fisheries to improving marine environmental health</i> <i>3.4.4 Provide guidance on reducing discharge of solid waste from fishing boats</i> Output 3.5: Strengthened regional capacities for fisheries tenure interventions <u>Indicator:</u> Number of countries participating in regional workshop on fisheries tenure (Target = 6) <u>Activities:</u> <i>3.5.1 Workshop on best practices in fisheries tenure in the Mediterranean</i>							
Component 4: Innovative blue economy solutions accounting for the fishery sector							
Outcome 4 Blue economy at the regional and country level promoted through the identification of existing hurdles via a concerted approach among relevant stakeholders	1) Number of regional political/strategic processes considering strategic guidance documents on leveraging Blue Economy opportunities for the fisheries sector	1) 0 regional political/strategic processes considering strategic guidance documents on leveraging Blue Economy opportunities for the fisheries sector	1) 0 regional political/strategic processes considering strategic guidance documents on leveraging Blue Economy opportunities for the fisheries sector	1) 1 regional political/strategic processes considering strategic guidance documents on leveraging Blue Economy opportunities for the fisheries sector	Project progress reports developed. Investment plans/proposals	Relevant female and male stakeholders are willing to identify existing hurdles via a concerted approach at national level	Government agencies Implementation partners Industry groups
	2) Number of countries where a NAP+ with investment plan was developed, including with at least one pilot activity initiated	2) 0 countries where a NAP+ with investment plan was developed, including with at least one pilot activity initiated	2) 0 countries where a NAP+ with investment plan was developed, including with at least one pilot activity initiated	2) At least 1 country where a NAP+ with investment plan was developed, including with at least one pilot activity initiated	Action Plan Meeting reports Project evaluations Project training reports		
Output 4.1: Strategic guidance prepared to support alignment of fisheries sector priorities and needs with emerging Blue Economy opportunities in the Mediterranean region. <u>Indicator:</u> Number of strategic guidance documents produced on integrating and promoting fisheries within a Blue Economy context (Target = 1) <u>Activities:</u> <i>4.1.1 Prepare a strategic guidance document that identifies information and data needs, as well as relevant stakeholders, to facilitate better positioning the fisheries sector within regional Blue Economy strategies</i> <i>4.1.2 Pilot the promotion of new market opportunities for fisheries within a Blue Economy context, with particular attention to the valorization of edible non-indigenous species (NIS)</i> Output 4.2: NAP+ with investment plan developed and pilot activity initiated <u>Indicator:</u> Number of countries advancing a NAP+ (Target = At least 1) <u>Activities:</u> <i>4.2.1 Carry out data collection and national analytical studies on biodiversity-based blue economy opportunities and constraints in interested Partner Countries.</i> <i>4.2.2 Develop a NAP+ with investment plan adapted to country contexts</i> <i>4.2.3 Implement pilot actions demonstrating NAP+ and supporting readiness for innovative finance mechanisms.</i> <i>4.2.4 Develop regional guidance documenting lessons learned from NAP+ processes and pilot actions.</i>							
Component 5: Knowledge management and outscaling							

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
Outcome 5 Integrated pathways conducive of conservation and sustainable management promoted at the regional and global level	1) Number of subnational, national and regional institutions that are applying ecosystem-based fisheries management approaches in their work (e.g. official policies, strategies, work plans, fishing activities) due to project activities	1) 0 subnational, national and regional institutions that are applying ecosystem-based fisheries management approaches in their work (e.g. official policies, strategies, work plans, fishing activities) due to project activities	1) 6 subnational, national and regional institutions that are applying ecosystem-based fisheries management approaches in their work (e.g. official policies, strategies, work plans, fishing activities) due to project activities	1) At least 6 subnational, national and regional institutions that are applying ecosystem-based fisheries management approaches in their work (e.g. official policies, strategies, work plans, fishing activities) due to project activities	Project progress reports Project evaluations Project training reports National and regional meeting reports Project reports. Strategies	Project's partners cooperate in identifying and sharing lessons learned and successful policies and practices on conservation and sustainable fishery management. Growing international attention to conservation and sustainable fishery management and political stability in the Mediterranean Basin	Government agencies Implementation partners
	2) Number of project communication and knowledge products that are produced, shared, or actively promoted by project stakeholders across national, regional and global platforms	2) 0 project communication and knowledge products that are produced, shared, or actively promoted by project stakeholders across national, regional and global platforms	2) 14 project communication and knowledge products that are produced, shared, or actively promoted by project stakeholders across national, regional and global platforms	2) 32 project communication and knowledge products that are produced, shared, or actively promoted by project stakeholders across national, regional and global platforms			
Output 5.1: Coordination mechanisms created or strengthened to support NAP+ processes <u>Indicators:</u> Number of countries where coordination mechanisms have been created or strengthened to support NAP+ (Target = 4) <u>Activities:</u> <i>5.1.1 Promotion and support to national coordination mechanisms related to NAP+, involving public and private actors, through coordination meetings</i>							
Output 5.2: Learning and uptake of ecosystem-based fisheries management approaches promoted <u>Indicator:</u> Number of participants supported by project trainings, workshops or other learning opportunities (Target = 225, disaggregated male/female) <u>Activities:</u> <i>5.2.1 Participation of project stakeholders in relevant expert groups, regional and global meetings to advance or disseminate project results</i> <i>5.2.2 Project wrap-up meeting to assess the impact of learning generated by the project, document lessons learned and identify future priorities</i>							
Output 5.3: Lessons learned and good practices disseminated to showcase project impact, including the benefits of the concerted GFCM-MAP approach <u>Indicator:</u> Number of lessons learned, good practice and communications products published through FAO-GFCM, UNEP-MAP/SPA/RAC, IW:Learn and/or project beneficiaries' platforms (Target = 64) <u>Activities:</u> <i>5.3.1 Framework and repository for the collection of information on project activities, progress and achievements</i> <i>5.3.2 Development and implementation of the FishEBM MED Outreach & Communication Strategy</i> <i>5.3.3 Creation of communications content tailored to the various stakeholders in the region to disseminate project achievements, including IW:Learn experience notes</i> <i>5.3.4 Preparation and population of a project website</i> <i>5.3.5 Preparation and implementation of national KM toolkits targeting project beneficiary countries</i>							
Output 5.4: Participation in relevant global GEF-related fora <u>Indicator:</u> Number of IW:Learn global meetings attended (Target = 6) <u>Activities:</u> <i>5.4.1 Participation in IW:Learn Annual Large Marine Ecosystems Consultative Meetings</i>							

Mid Term Review of the FishEBM Mediterranean Project

Results Chain	Indicators	Baseline	Mid-term milestone	Final Target	Means of Verification (MOV)	Assumptions	Responsible for data collection
<i>5.4.2 Participation in IW:Learn International Waters Conferences</i>							
Monitoring and Evaluation							
An operational project M&E system implemented	Number of project reports produced, in line with FAO and GEF requirements and the project M&E plan.	0	9	At least 13	Inception report, PSC reports, PPRs, PIRs, MTR report, Terminal Evaluation	Continued project implementation through NTE date	PMU
Project management coordination framework established	Project management unit TORs defined, including organigramme and regular coordination mechanism	0	0	1	PSC reports	Project IAs and EAs collaborate jointly on project implementation	PMU