

## Terminal Evaluation of the UN Environment Project “Support for Implementation of the National Biosafety Framework for Egypt”

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March 2018  
Evaluation Office of UN Environment



## Evaluation Office of UN Environment

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Title of the Project: "Support for Implementation of the National Biosafety Framework for Egypt"

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## ABOUT THE EVALUATION<sup>1</sup>

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**Joint Evaluation:** No

**Report Language(s):** English

**Evaluation Type:** Terminal Project Evaluations

**Brief Description:** This report is a terminal evaluation of a UN Environment-GEF project implemented between 2007 and 2017. The Project overall goal was to support Egypt in implementing its National Biosafety Framework and in building country's capacity for the Implementation of the Cartagena Protocol on Biosafety. The Evaluation sought to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UN Environment, the GEF and their executing partner

**Key words:** Biosafety, Genetically Modified Organisms (GMOs), Cartagena Protocol on Biosafety (CPB), Competent National Authority (CNA), National Biosafety Committee, Regulatory regime, Administrative System, Risk Assessment and Management, Awareness and Participation, Socio-political and Institutional Sustainability, Project Evaluation, GEF.

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

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## Project Identification Table

### Project “Support for Implementation of the National Biosafety Framework for Egypt”

<b>GEF project ID:</b>	2824	<b>IMIS number:</b>	GFL/2328-2716-4954
<b>UN Environment Focal Area(s):</b>	Environmental governance	<b>Project Type:</b>	MSP
<b>GEF Strategic Priority/Objective:</b>	OP: Biodiversity 5 (project prior to 2007)	<b>GEF approval date:</b>	na
<b>UN Environment approval date:</b>	30/10/2006	<b>First Disbursement:</b>	01/07/2007
<b>Actual start date:</b>	01/07/2007	<b>Planned duration:</b>	48 months
<b>Planned completion date:</b>	29/10/2010	<b>Actual completion date:</b>	Expected 29/06/2017 (80 months of extension)
<b>Planned project budget at approval:</b>	2,297,100 USD	<b>Total expenditures reported as of 30/06/2017</b>	1,952,776 USD (June 2017)
<b>GEF Allocation:</b>	908,100 USD	<b>GEF grant expenditures reported as of 30/06/2017</b>	560,035 USD (62%)
<b>Expected MSP/FSP Co-financing:</b>	1,389,000 USD	<b>Secured MSP co-financing (June 2017)</b>	1,487,442 USD
<b>Leveraged extra financing:</b>	98,442 USD (from Govt.)	<b>No. of Audits (last Audit reported)</b>	8 (last: 2013, rep. 10/2014)
<b>Mid-term review/eval. (planned date):</b>	Na	<b>Mid-term review/eval. (actual date):</b>	10/2009
<b>No. of budget revisions:</b>	16	<b>Date of last Revision:</b>	01/01/2017
<b>Date of last Steering Committee meeting</b>	October 2017	<b>Terminal Evaluation (actual date):</b>	September – November 2015 Revised (Desk review): December 2017
<b>Date of financial closure:</b>	Not yet closed		

## **List of Acronyms and Abbreviations**

ANUBIS	A New UN Environment Biosafety Information System
BCH	Biosafety Clearing House
CBD	Convention on Biological Diversity
CNA	Competent National Authority
COP-MOP	Conference of the Parties serving as the Meeting of the Parties to the Cartagena Protocol on Biosafety
CPB	Cartagena Protocol on Biosafety
GEF	Global Environmental Facility
GMO	Genetically Modified Organism
LMO	Living Modified Organism
LogFrame	Logical Framework
MoE	Ministry of Environment
NEA	National Executing Agency
NPC	National Project Coordinator
ProDoc	Project Document
TOC	Theory of Change
ToR	Terms of Reference



**Explanatory Note to the Follow-up of the Terminal Evaluation  
of the UN Environment/Global Environment Facility project:  
“Support for Implementation of the National Biosafety Framework for Egypt”**

- a) The Project “Support for Implementation of the National Biosafety Framework for Egypt” (GFL/2328-2716-4954) was approved in October 2006 for a duration of 4 years (2006-2010). The complex socio-political situation of the country, following the insurgence of the “Arab spring” in 2010, brought about considerable delays and obstacles to the implementation of the Project, which had to repeatedly postpone activities and the expected completion date.
- b) A Terminal Evaluation (TE) of the Project took eventually place in the period between September and November 2015 and included a mission to Egypt from 08/11/2015 to 14/11/2015. The TE draft Report was circulated and a final version was produced in February 2016 after receiving comments from the relevant UN Environment offices and from the Project staff.
- c) Subsequent to the TE, an activity of revision and assessment, called “Follow-up of the Terminal Evaluation”, was then planned to update the TE report. More specifically, the Follow-up of the Terminal Evaluation, according to its Terms of Reference (see Annex 2), was expected “to integrate updated information to June 2017 as relevant, particularly looking at the sections regarding Conclusions, Recommendations and Overall Scoring of the Project. The Executive Summary should also be revised accordingly”.
- d) The Follow-up of the Terminal Evaluation has been actually carried out in December 2017 by the same Consultant that had executed the Terminal Evaluation in 2015. The task has been basically developed through the Desk Review of the new Project’s documents uploaded to the Information System ANUBIS in 2016 and 2017, with emphasis on the Terminal Documents, notably the Final Project Outputs Summary and the Project Terminal Report.
- e) The Consultant has also exchanged and doubled checked information with the Project Team, particularly regarding some relevant documents recently produced by the Project and posted in ANUBIS (summary version in English available), as well as key issues highlighted at the time of the Terminal Evaluation, such as the institutional uptake and sustainability of Project’s results, and the way forward. These issues have been clarified by the National Project Coordinator in his communication to the Consultant (14/12/2017). The Financial Tables of the Terminal Report have also been updated to June 2017.
- f) The Follow -up of the Terminal Evaluation has, therefore, been a fruitful exercise that has allowed getting an accurate and updated information on the final results of the Project and has showed significant improvements in results achievement and in their institutional sustainability. Accordingly, as requested in the ToR of the Follow-up (Annex 2), the Conclusions, Recommendations and Overall Scoring of the Project of the Terminal Evaluation of 2015 have been reviewed (chapter 6), as well as the Executive Summary.
- g) The overall content of the Report has also been revised and updated to reflect and integrate new information. The format of the report has been slightly readjusted as well, taking into account the new UN Evaluation Office format that has been recently modified.

## Executive Summary

1 The Project “Support for Implementation of the National Biosafety Framework for Egypt” (GFL/2328-2716-4954) was approved in October 2006 for a duration of 4 years (2006-2010) and a total budget of USD 2.297.100, the 40% of which represents the GEF allocation (USD 908.100) being the remaining 60% (USD 1.389.000) provided by the Government of Egypt. Mainly due to the extraordinary socio-political situation of the country after 2010, the Project had to repeatedly postpone activities and the expected completion date (Current Official End 29/06/2017).

2 The Terminal Evaluation (TE) of the Project took place in the period between September and November 2015 and included a mission to Egypt from 08/11/2015 to 14/11/2015. Subsequent to the TE, an activity of revision and assessment, called “Follow-up of the Terminal Evaluation”, was then planned to update the TE report. More specifically, the “Follow-up of the Terminal Evaluation”, according to its Terms of Reference (see Annex 2), was expected “to integrate updated information to June 2017 as relevant, particularly looking at the sections regarding Conclusions, Recommendations and Overall Scoring of the Project”. The Follow-up has been actually carried out in December 2017 and this Report reflects the updated Findings, Conclusions and Recommendations.

3 As discussed in Chapters 3.1 (Context) and 5.1 (Strategic Relevance), Biosafety is a key-issue in Egypt. The development of agricultural biotechnology is regarded as a mean to overcome the limits of country’s renewable resources, namely land and water (only 3,4% of the area of the country is under irrigation) and to deal with the challenges imposed by a fast-growing population (third most populous country of Africa). In this context, Egypt has become one of the most advanced developing countries in the adoption and development of bio-technologies for agriculture.

4 The country is also strongly committed to safeguard and enhance its biodiversity and is devoting significant efforts and implementing several projects to protect the Natural Resources of its unique ecosystems. The recent Egyptian Biodiversity Strategy and Action Plan (2015-2030) is a tangible and comprehensive instrument for the purpose and has clearly pointed out the need to pursue efforts and programmes to effectively address Biosafety management in the country.

5 As a matter of fact, Egypt has ratified the Cartagena Protocol on Biosafety in 2003 and was included between the eighteen countries piloting the GEF-funded “Biosafety Enabling Activity” by implementing the Project “National Biosafety Framework for Egypt” since 1999. A draft Biosafety Law was formulated in 2004 to establish a comprehensive national regulatory regime covering all the aspects of GMOs use in the country. The Ministry of Environment (MoE) through its Egyptian Environmental Affairs Agency (EEAA) was mandated by the Parliament to revise the draft law and bring it in conformity with the Protocol, becoming the Competent National Authority (CNA) for the Protocol implementation. A national Committee of 14 members representing the main Ministries and other relevant institutions was constituted to support the CNA in this task.

6 The current Project was, therefore, conceived in those years to convey UN Environment / GEF support to complete and implement a comprehensive National Biosafety Framework (NBF) that would include the regulatory, administrative and enforcement systems, hence making fully operational the Law that was in its final steps for approval. According to the ProDoc, in fact, the draft Biosafety law was “due to be approved by the People’s Assembly during the development of the Project”.

7 As described in chapter 3.5, the Project started its operations in 2007 with an initially planned duration of four years and entered in its full implementation phase in 2008. The existing draft of the Biosafety Law prepared in 2004 became the focus of an intense discussion and

political negotiation eventually leading to a consensual Draft Law in 2010, endorsed by nine line-Ministries, to be sent to the Prime Minister Cabinet for the preliminary approval by the Government. That coincided with the uprising of the so-called “Arab Spring” and the subsequent political instability of the country, which has produced and protracted an unworkable institutional framework that has strongly affected Project’s implementation from 2010 to 2014. A new Government was formed only in 2015 and in January 2016 the Egyptian Parliament resumed its activities.

8 The political and institutional crisis has inevitably affected the smooth implementation of the Project. The country has remained without Parliament for years, Ministries and managers have frequently changed (e.g. the MoE has changed five Ministries from 2011 to 2015). As a consequence, in those years, the Project, despite pursuing some activities (preparation of the Regulations of the Law and Technical Guidelines, trainings, etc.), had to limit, to a large extent, its initiatives. Several extensions for a total of 80 months have been granted, shifting, as mentioned above, the official completion date to 29/06/2017, as well as 16 Budget Revisions, mostly to reallocate unspent money.

9 As outlined in chapter 5.4.1 (Outputs delivery), the Draft Biosafety Law was discussed again among the stakeholders and approved by the new Cabinet of Ministers in July 2015. It is currently being revised by the cabinet’s Judicial Reform Committee, prior to submission to the Parliament of Egypt for approval, which is expected to occur in 2018. The delayed approval of the Biosafety Law and of the Regulations has inevitably hampered the setting of the Biosafety Administrative, Monitoring and Enforcement Systems, i.e. the effective establishment of a comprehensive Biosafety Management System in the country.

10 The motivation and resilience of the Project Team and of the National Stakeholders have been strong driving forces for setting the Biosafety agenda in the country and for implementing it at the best of their capacities. As a matter of fact, despite the extraordinarily complex socio-political environment of Egypt from 2010 to 2014, the Project has satisfactorily delivered relevant Outputs (see chapter 5.4.1), relatively to:

- the preparation of the legal and administrative framework (Draft Biosafety Law and Executive Directive Regulation, draft Technical Guidelines for Risk Assessment and Management, among others)
- the elaboration of technical manuals and the capacity building of national stakeholders through training activities;
- the preparation and implementation of outreach activities and materials for awareness raising and information of national stakeholders and for the public in general;
- the improvement of GMOs detection capacity by the upgrading of three selected reference laboratories (two in Cairo and one in Alexandria) and the training of their technical staff.

11 Project activities and Outputs delivery have remarkably increased in the last two years (2016-2017), as confirmed by the increase of the budget expenditure rate that augmented from 34% (2015) to 62% (2017). Particular emphasis has been given in the last two years for preparing and setting-up appropriate strategies for the sustainability of the Biosafety Framework after the end of the Project, notably the Biosafety National Strategic Action Plan (2017-2022) and the Communication, Education and Public Awareness Plan. These documents provide the general “road-map” to identify Biosafety priorities and to define a strategy for resource mobilisation in the short-medium term. The overall improvement of the Effectiveness of the Project is reflected in the remarkable increase of Project rating in Effectiveness (see the Summary Table here below) from 2015 to 2017 (from Unsatisfactory to Moderately Satisfactory, due to a still lacking fully functional Biosafety Framework).

12 The improved stability of the political situation has been profitably used by the Project to focus on the consolidation of the Biosafety sector within the Ministry of Environment / Egyptian Environmental Affairs Agency and to enhance the coordination with the nine line-ministries that will be involved in Biosafety Management, once the Law is approved. Accordingly, the Sustainability of the results has significantly improved in the last few years, from Moderately Unlikely to Moderately Likely (see Summary Table below).

13 All the dimensions of the Financial Management have been satisfactorily addressed by the Project and both the Terminal Evaluation of 2015 and the Follow-up carried-out in 2017 have confirmed the capacity of the Project Team to provide, store and meaningfully discuss the financial issues regarding Project's implementation. Despite the evident delays due to external and unsurmountable impediments, which has undoubtedly challenged time-efficiency, the Project has implemented forms of adaptive and cost-effective management, by building upon existing national know-how and by upgrading existing and well-established national laboratories. Overall, Project Efficiency has been judged Satisfactory.

14 The "Follow-up of the Terminal Evaluation" has, therefore, concluded that substantive steps have been given for the setting of the four components of the National Biosafety Framework, though there is still the need to complete and consolidate it, which will only be possible within a clear and enforceable regulatory regime formally defining roles, responsibilities, management mechanisms and procedures.

15 As discussed in chapter 5.4.2, the decision-making mechanism and the overall governance system, which are crucial steps for the full operationalisation of the Framework, still have to be set and prove effective under the foreseeable challenges of future GMOs applications in Egypt for different purposes. Capacity building programmes, manuals and guidelines produced so far will have to be updated and upgraded in accordance with emerging priority and needs, as well as with next COP-MOP decisions and new technologies. Particular emphasis has to be done to the capacity building of the Judiciary system.

16 According to the UN Environment evaluation methodology, most criteria have been rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability is rated from Highly Likely (HL) down to Highly Unlikely (HU). The complete Rating table is visualised in chapter 6.1.1, while a summary of the main evaluation criteria is reported here below.

**Summary Table of the main Evaluation Criteria and Ratings**

Criterion	Summary Assessment	Evaluator's Rating	Evaluation Office (EO) Ratings and comments
<b>A. Strategic Relevance</b>	Very satisfactory in all aspects.	<b>HS</b>	EO concurs
<b>B. Quality of Project Design</b>	Project Design Quality assessed in Inception Report and found weakly developed in some relevant aspects, like Project Preparation, Intended Results and Causality, Logical Framework and Monitoring.	<b>MU</b>	EO concurs
<b>C. Nature of External Context</b>	The political events of the "Arab spring", created an extraordinary socio-political situation for years triggering extremely unworkable institutional frameworks. A significant normalisation of the political situation was registered from 2015 on.	<b>Moderately Unfavourable</b>	EO concurs

Criterion	Summary Assessment	Evaluator's Rating	Evaluation Office (EO) Ratings and comments
<b>D. Effectiveness<sup>2</sup></b>		<b>S</b>	EO concurs only on the premise that the project operated under difficult contextual circumstances
<i>1. Delivery of outputs</i>	Main Expected Outputs delivered, despite limiting external conditions that hampered Project's performance.	<b>S</b>	<b>MS</b> – •The delivery of the most important outputs to achieve outcomes was delayed, for various reasons described in the report, thus impacting on their utility in producing expected outcomes
<i>2. Achievement of direct outcomes</i>	Most Immediate Outcomes satisfactorily achieved, but in need of completion and consolidation. Main Outcome to be fully achieved.	<b>MS</b>	EO concurs
<i>3. Likelihood of impact</i>	Steps given towards Impact but still too early to indicate a steady progress towards Impact.	<b>L</b>	<b>ML</b> – A key assumption only partially holds - without the enactment of the Biosafety Law and its regulations, the realisation of the main Outcome (a fully operational NBF) will be significantly impacted, and prohibit progression towards the intended Impact
<b>E. Financial Management</b>		<b>HS</b>	EO concurs
<b>F. Efficiency</b>	Forms of adaptive management have been considered Cost-Effective. However, taking into account the protracted duration, Time-Efficiency was highly challenged.	<b>S</b>	<b>MU</b> –project has been significantly extended (80 months) against the formally approved results framework. All things considered, the over protracted duration ought not be considered satisfactory
<b>G. Monitoring and Reporting</b>		<b>MS</b>	EO concurs
<i>1. Monitoring design and budgeting</i>	The Logframe and the M&E Plan were found weak and uncoherent to one another. No budget provision for Monitoring and Evaluation.	<b>MU</b>	EO concurs
<i>2. Monitoring of project implementation</i>	Monitoring of activities was carried out by the TM, the Steering Committee and the Project Coordinator, but a comprehensive and structured Monitoring System of Results was not effectively put in place.	<b>MS</b>	EO concurs
<i>3. Project reporting</i>	GEF/UN Environment tools for Monitoring Progress Reports have been implemented, transmitted and filed.	<b>S</b>	EO concurs
<b>H. Sustainability</b>		<b>ML</b>	EO concurs

<sup>2</sup> Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together.

Criterion	Summary Assessment	Evaluator's Rating	Evaluation Office (EO) Ratings and comments
1. Socio-political sustainability	Highly depending on external factors and on the national capacity of accommodating and negotiating different, somewhat diverging, agendas	<b>ML</b>	EO concurs
2. Financial sustainability	Substantive steps have been given to mainstream Biosafety within the national strategic planning and funding.	<b>ML</b>	EO concurs
3. Institutional sustainability	Likely to happen, given the coordinating mechanisms established with the support of the Project between the main line-ministries.	<b>L</b>	<b>ML</b> - A key assumption identified in the TOC (i.e. the approval of the Biosafety Law) is critical to institutionalising and operationalising the NBF
<b>I. Factors Affecting Performance</b>			
1. Preparation and readiness	Despite some relevant weaknesses in the Project Design, the Project built coherently upon the previous Project "Development of the Nat. Biosafety Framework".	<b>MS</b>	EO concurs
2. Quality of project management and supervision	Procedures of management were up to the standards, despite the delicate socio-political phase. Relevant role of UNEP in warranting continuity.	<b>S</b>	EO concurs
3. Stakeholders participation and cooperation	Pivotal role of the Ministry of Environment and improved participation and coordination in recent years.	<b>HS</b>	EO concurs
4. Responsiveness to human rights and gender equity	Not explicitly implemented, not referred to in any Project document / report produced by the Project. Some disaggregated data by gender on participants in project's activities (e.g. training)	<b>MS</b>	EO concurs
5. Country ownership and driven-ness	Demonstrated by the involvement of national stakeholders in drafting and discussing the regulatory regime and guidelines.	<b>S</b>	EO concurs
6. Communication and public awareness	Still to be clearly set-up and consolidated	<b>S</b>	EO concurs
<b>Overall project rating</b>		<b>S</b>	<b>S</b> (overall rating has been based on a weighted scoring system used by the Evaluation Office)

17 The Follow-up of the Terminal Evaluation has formulated a single main Recommendation regarding the full operationalisation of the National Biosafety Framework, namely focussing on two aspects: the enhancement of national capacities in some key-areas (see below) and the setting of a national strategy for mobilising national and international resources for further increasing the sustainability of the Biosafety Framework in the country.

Recommendation 1: to MoE / EEAA (Min. of Environment / Egyptian Environmental Affairs Agency) and to UN Environment (regarding the full operationalisation of the National Biosafety Framework)

**Recommendation 1:**

The Evaluation recommends the implementation of the measures foreseen in the National Strategic Action Plan for Biosafety 2017-2022 and in the National Biodiversity Strategy and Action Plan / NBSAP (regarding Biosafety), through two main instruments:

- a) A comprehensive short-medium term Capacity Building Plan (2-3 years) addressing the priority areas identified in the two documents above, with emphasis on:
  - Finalization of all pending issues related to the Law, Executive Regulations and Guidelines, particularly targeting the Judiciary system;
  - Risk Assessment and Risk Management including Risk Communication;
  - Socio-economic considerations in Risk Assessment;
  - Improvement of the detection and inspection system;
  - Improvement of the National Biosafety Clearing-House;
  - Entry-points for Public Participation.
- b) The setting of a resources mobilization strategy at National and International level (e.g. NBSAP, GEF/UN Environment, NEPAD, Bilateral Cooperation) for the areas outlined above.



# 1 Introduction

1. In its capacity as an Implementing Agency of the Global Environmental Facility (GEF), UN Environment has been providing administrative and technical assistance to countries participating in the Cartagena Protocol on Biosafety (CPB) for the development and implementation of National Biosafety Frameworks (NBF). The frameworks are a combination of policy, legal, administrative and technical instruments enabling the countries to manage the safe transfer, handling and use of living modified organisms (GMOs<sup>3</sup>) from modern biotechnology.

2. This is the final report of the Terminal Evaluation of the Project “Support for Implementation of the National Biosafety Framework for Egypt” (GFL/2328-2716-4954). The Project was approved in October 2006 for a duration of 4 years (2006-2010) and a total budget of USD 2.297.100, the 40% of which represents the GEF allocation (USD 908.100) being the remaining 60% (USD 1.389.000) provided by the Government of Egypt. Mainly due to the extraordinary socio-political situation of the country after 2010, the Project had to repeatedly postpone activities and the expected completion date (Current Official End 29/06/2017).

3. The Terminal Evaluation took place in the period between September and November 2015 and included a mission to Egypt from 08/11/2015 to 14/11/2015. A “Follow-up of the Terminal Evaluation” was then planned (see the Explanatory Notes in the preliminary pages of this Report) and carried-out in December 2017 through a Desk Review of Project’s implementation, to integrate updated and relevant information. The Evaluation Team consisted of one consultant specialist of projects evaluation in the environmental sector (See Annex 8) working under the methodological guidance of the UN Environment Evaluation Office (EO).

# 2 The Evaluation

4. In line with the UN Environment Evaluation Policy and Evaluation Manual and following the Guidelines for GEF Agencies on Conducting Terminal Evaluations, the Terminal Evaluation has been undertaken upon completion of the Project to assess project performance (in terms of relevance, effectiveness and efficiency), and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The evaluation had two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UN Environment the GEF and their executing partners – the National Executing Agency (Ministry of Environment) and the national partners.

5. According to the UN Environment evaluation methodology, most criteria have been rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability is rated from Highly Likely (HL) down to Highly Unlikely (HU).

6. As requested by the UN Environment’s methodology for Terminal Evaluations, an Inception Report was produced at the beginning of the mission, containing a review of the project context, of project design quality, a draft reconstructed Theory of Change of the project, the evaluation framework and a tentative evaluation schedule.

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<sup>3</sup> In this Report, the terms LMO (Living Modified Organism) and GMO (Genetically Modified Organism) are considered synonymous and indifferently used.



7. According to the Terms of Reference (TOR) received, a participatory approach has been used since the preparation of the field mission, through a preliminary exchange of evaluation tools with the National Project Coordinator and the joint preparation of the agenda for the country visit. Once fielded, the mission, had the opportunity to meet with relevant stakeholders and to collect and discuss first-hand information, opinions and suggestions or recommendations.

8. The main methods and tools used in the Evaluation have been:

- A Desk Review of all project documents and tools the consultant has access to (see Annex 7), including the ANUBIS platform.
- Exchanges with the Project Management Team at UN Environment, namely the Task Manager.
- A Country Visit (November 2015). The interviews during the country visit included, beside the Project Team (the Nat. Project Coordinator is also CBD Focal Point), the National Executing Agency (NEA) at different levels, GEF Focal Point, CPB and BCH Focal Point, national advisors of the Project, staff of national laboratories involved in GMO detection, Civil Society representatives and representatives of academic and research institutions<sup>4</sup>;
- A supplementary Desk Review carried out in December 2017 to integrate and update information as a follow-up to the terminal evaluation.

## **3 The Project**

### **3.1 Context**

9. Egypt has limited renewable resources of land and water for agricultural purposes (only 3,4% of the area of the country is under irrigation)<sup>5</sup> and a fast-growing population of nearly 93M people (third most populous country of Africa)<sup>6</sup>. More than 20M live in the metropolitan area of El Cairo. Food Security is a relevant challenge for the country (Egypt is the world's largest wheat importer)<sup>7</sup> and the need for increased agricultural yields is impelling.

10. In this context, Egypt has become one of the most advanced developing countries in the adoption and development of agricultural biotechnology. The national AGERI (Agricultural Genetic Engineering Research Institute) was established in 1990 by the Ministry of Agriculture and Land Reclamation (MoALR) with the strong support of USA Development Aid, becoming a recognized state-of-the-art center for research activities at regional level. In 2000, it had a staff of more than 20 PhD scientists and about 60 MSc and BSc-level researchers.

11. In that context, Egypt was included as one of the eighteen countries piloting the GEF-funded "Biosafety Enabling Activity" by implementing the Project "National Biosafety Framework for Egypt" in 1999, through which a draft Biosafety Law was formulated to establish a comprehensive national regulatory regime covering all the aspects of GMOs use in the country.

12. After signing the CPB in 2000, Egypt ratified it in 2003 and the newly created (1997) Ministry of Environment (MoE), at that time Ministry of State for Environmental Affairs (MOSE), became the Competent National Authority (CNA) for the Protocol implementation<sup>8</sup>. The MoE was mandated by the Parliament to revise the draft law and bring it in conformity with the Protocol, in consultation with the relevant stakeholders.

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<sup>4</sup> See list of people met in Annex 3

<sup>5</sup> Source: FAO, 2012

<sup>6</sup> UNdata.2016

<sup>7</sup> <http://www.fao.org/giews/countrybrief/country.jsp?code=EGY>

<sup>8</sup> It has to be stressed, however, that the EEAA (Egyptian Environmental Affairs Agency) existed since 1982

13. A national Committee of 14 members representing the main Ministries and other relevant institutions was put in place and a new draft Law was prepared by early 2004. According to the ProDoc, the draft Biosafety law was “due to be approved by the People’s Assembly during the development of the Project”. The current Project was, therefore, conceived in those years to convey UN Environment / GEF support to complete and implement a comprehensive National Biosafety Framework (NBF) that would include the regulatory, administrative and enforcement systems, hence making fully operational the Law that was in its final steps for approval.

14. In 2010 the Draft Biosafety Law, approved by nine line-Ministries, was sent to the Government for approval and submission to the Parliament. That coincided with the uprising of the so-called “Arab Spring” followed by the dramatic events that characterized the prolonged socio-political instability of the country from 2010 onwards, as described in chapter 3.5.

### 3.2 Objectives and components

15. According to the ProDoc (Project Document), “The overall goal of the project is that by 2009 Egypt has a workable and transparent national Biosafety Framework in line with its national development priorities and international obligations”. The Project was conceived to achieve four (4) Outcomes, as visualised in the following Table.

**Table 1: Components and Outcomes of the Project (according to Project Document)**

<b>Components</b>	<b>Outcomes</b>
1.Strengthening the Biosafety Regulatory System	Egypt has a fully functional and responsive regulatory regime in line with Cartagena Protocol (CP) and national needs
2.Strengthening the Biosafety Administrative System	Egypt has a functional national system for handling request for permits for LMOs
3.Monitoring and Enforcement	Egypt has a functional national system for “follow-up”, namely monitoring of environmental effects and inspections
4. Public awareness and participation	Egypt has a functional national system for public awareness, education, participation and access to information

### 3.3 Stakeholders

16. The Project is essentially an Institutional & Capacity Building Project aiming at strengthening national capacities to fulfil the national and international obligations of the Cartagena Protocol on Biosafety (CPB). The ProDoc provides a very exhaustive list of the main stakeholders and their roles in implementing Biosafety related issues in the country. The main stakeholder is the Competent National Authority, i.e. the Ministry of Environment (MoE), particularly the Nature Conservation Sector (NCS) that houses the Biodiversity Department and its Biosafety Unit, as well as the Sector for Foreign Projects.

17. Other Ministries have been actively involved, such as the Ministry of Health (particularly the Central Laboratory of Public Health), the Ministry of Higher Education (mainly through the University of Cairo, Faculty of Agriculture and its Laboratories) and the Ministry of Scientific Research and Technology (mainly through its City of Science & Technology based in Alexandria).

18. The discussion and revision of the Law has deeply involved nine line-Ministries (Environment, Agriculture & Land Reclamation, Health, Justice, Foreign Affairs, Finance, International Cooperation, Higher Education and Scientific Research & Technology).

19. The Project has equally promoted partnerships with Civil Society organisations particularly active on Biodiversity and Nature Conservation, with Youth and with the Media (newspapers and TV).

20. A group of Senior National Advisors has played a pivotal role in the Project implementation by voluntarily providing their highly qualified know-how in different areas of Biosafety, some of them being recognized authorities in the national and international academic and research arena.

### **3.4 Project implementation structure and partners**

21. The National Executing Agency (NEA) was the Ministry of Environment (MoE), through its Egyptian Environmental Affairs Agency (EEAA). According to its ToR (Annex 1.e to the ProDoc), the NEA has established the National Coordinating Committee (NCC) of the Project with the main responsibility to oversee and review the implementation and achievement of the expected results, to provide overall policy advice, to mobilize national support, to ensure national ownership and to approve work plans and budget.

22. Following what initially planned in the ProDoc, the NEA has also appointed the National Project Coordinator (NPC) that, with the support of a Project Assistant and a Finance & Administration Assistant, has been responsible for the coordination and supervision of all the activities of the Project, such as the preparation of work plans and budgets, communication with authorities and stakeholders, organization and supervision of the external technical assistance, monitoring and reporting to UN Environment.

### **3.5 Changes in design during implementation**

23. The Project has been approved by UN Environment the 30/10/2006 for a duration of 48 months (4 years) and the first disbursement and starting of the activities occurred the 02/07/2007, due to procedural impediments for the transfer of funds and delays in the nomination of the National Project Coordinator.

24. In 2007 preliminary activities were implemented for the Project set-up (Appointment of Project Coordinator and Financial & Administrative officer, office setting), institutional contacts and arrangements were made, the National Coordinating Committee (NCC) composed by representatives of nine (9) Ministries was established, an inception workshop was organized (July) and the Work Plan and Budget were revised.

25. In 2008 the Project entered in its full implementation phase. The existing draft of Biosafety Law (prepared after Egypt's ratification of CPB of 2003 and finalised in March 2004) became the focus of an intense discussion and political negotiation. In 2010, a consensual Draft Law (endorsed by the nine Ministries represented in the NCC) was agreed upon and ready to be sent to the Prime Minister Cabinet for the preliminary approval by the Government. That coincided with the uprising of the so-called "Arab Spring" and the subsequent political instability of the country.

26. The political and institutional crisis from 2010 to 2013, eventually culminated with the establishment of a new Government in 2014, has inevitably affected the smooth implementation of the Project. The country has remained without Parliament for years, Ministries and managers have frequently changed (e.g. the MoE has changed five Ministries from 2011 to 2015). As a consequence, in those years, the Project, despite pursuing some activities (preparation of the Regulations of the Law and Technical Guidelines, trainings, etc.), had to limit, to a large extent, its initiatives.

27. Several extensions (seven according to ANUBIS data) for a total of 80 months have been granted, shifting the official completion date to 29/06/2017, as well as 16 Budget Revisions, mostly to reallocate unspent money. From 2014 onward the Project has renewed its activities up to now. Notwithstanding all the above, the overall Project design has not been changed and the planned Outcomes and Outputs have been maintained.

### 3.6 Project financing

**Table 3: GEF Budget at design and expenditures by components (June 2017)**

Component/sub-component	Estimated cost at design	Actual Cost	Expenditure ratio (actual/planned)
Regulatory regime	98.600	37,437	38%
Handling requests for authorizations	117.100	29,459	25%
Follow-up mechanisms	391.100	159,627	41%
Public awareness & participation	69.300	142,132	206%
Project management	162.000	96,679	60%
<b>Sub Total</b>	<b>838.100</b>	<b>465,334</b>	<b>56%</b>
UN Environment technical Support	70.000	94,701	135%
<b>Total</b>	<b>908.100</b>	<b>560,035</b>	<b>62%**</b>

\*\* The expenditure ratio was 34% in September 2015, at the time of the Terminal Evaluation

**Table 4: Co-financing Table**

Co financing (Type/Source)	IA own Financing		Government		Other		Total		Total Disbursed
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
- Grants									
- Loans									
- Credits									
- Equity investments									
- In-kind support			1.389.000	<b>1.487.442</b>			1.389.000	1.487.442	1.487.442
- Other									
<b>Totals</b>			<b>1.389.000</b>	<b>1.487.442</b>			<b>1.389.000</b>	<b>1.487.442</b>	<b>1.487.442</b>

## 4 Theory of Change (TOC) of the project

### 4.1 The reconstructed TOC of the project: overview

28. In the Inception Report of the mission, the consultant presented a reconstructed Theory of Change (TOC)<sup>9</sup> of the Project, based on the project design, other UN Environment/ GEF documents and the comments received from UN Environment Evaluation Office. The exercise of reconstruction of the Theory of Change has permitted to overcome inaccuracies and inconsistencies found in the ProDoc, where activities are listed, instead of Outputs, and in the Results Framework (Logframe), which did not define Outputs as well. Some of the Outcomes indicators in the Logframe could actually be considered as Outputs and, on that basis, a TOC was formulated.

29. The Table 5 here below presents a comparison between the Results stated in the ProDoc (including the Logframe) and the reconstructed TOC at Evaluation. As mentioned above (see 3.2),

<sup>9</sup> At the time of Project's preparation, the formulation of the Theory of Change of the Project was not requested

the project's objective "is that by 2009 Egypt has a workable and transparent national Biosafety Framework in line with its national development priorities and international obligations". Therefore, "A workable and transparent National Biosafety Framework (NBF)" can be considered as the Main Project Outcome to be achieved.

30. The four Immediate Outcomes of the TOC correspond to the four Outcomes defined in the ProDoc, while 22 Outputs have been identified, streamlined and clustered in four groups, as visualized in Diagram 1. The TOC also permits to appreciate to what extent the project has to date contributed, and is likely in the future to further contribute, to sustainable results likely to lead to the Global Environmental Benefit (Impact), as discussed in chapter 4.3 and diagram 2.

**Table 5: Comparison of Results**

<b>Results as stated in the ProDoc</b>	<b>Results as stated in the TOC at Evaluation</b>
	<b>Impact</b>
	Enhanced Conservation and Sustainable Use of Biological Diversity in Egypt
<b>Purpose of the Project as stated in the ProDoc (mentioned in chapter 2.5 of the ProDoc)</b>	<b>Intermediate States to Impact</b>
To support Egypt in its current effort to conform as Party to the Cartagena Protocol	1) Safe transfer, handling and use of living modified organisms resulting from modern biotechnology that may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health, and specifically focusing on transboundary movements, as requested under art. 1 of Cartagena Protocol (CPB); 2) National Biodiversity Strategy and Action Plan (NBSAP) fully operational, including Biosafety
<b>Overall Objective (in the ProDoc)</b>	<b>Main Project Outcome</b>
By 2009 Egypt has a workable and transparent national Biosafety Framework in line with its national development priorities and international obligations	A workable and transparent National Biosafety Framework (NBF) in Egypt
	<b>Intermediate States to Project Outcome</b>
	1) Improved Decision-making processes for LMOs approval, effective implementation mechanisms and enhanced quality information and transparency 2) Improved Governance of National Biosafety systems based upon: Rule of Law and Compliance, Accountability and Liability, Equity, Transparency and Citizens' Participation
<b>Outcomes (in the ProDoc)</b>	<b>Immediate Outcomes</b>
Egypt has a fully functional and responsive regulatory regime in line with Cartagena Protocol (CP) and national needs	A fully functional and responsive regulatory regime
Egypt has a functional national system for handling request for permits for LMOs	An administrative system for handling applications, Risk Assessment and Risk Management

Egypt has a functional national system for “follow-up”, namely monitoring of environmental effects and inspections	A follow-up system in place to monitor environmental effects and enforcement
Egypt has a functional national system for public awareness, education, participation and access to information	A functional system for public awareness, education and participation
<b>Outputs (ProDoc and Logframe)</b>	<b>Outputs</b>
<ol style="list-style-type: none"> <li>1) A survey of the current status of relevant existing laws and regulations, trials and release of LMOs and products thereof in Egypt</li> <li>2) Draft Biosafety Law on use handling release and placing on the market of locally produced or imported genetically engineered organisms and products into the environment adopted and in place;</li> <li>3) Executive Directive Regulations drafted, finalised, adopted and in place;</li> <li>4) Four workshops organised for 75 technical, administrative and legal experts, government stakeholders, legislators, managers and administrators to examine and discuss the Biosafety Law and Executive Directive Regulations.</li> <li>5) Clearly defined entity for decision-making with clearly defined roles and responsibilities</li> <li>6) Responsibilities assigned for emergency responses, accidental release and illegal movement</li> <li>7) Clear definition of procedures for handling notification</li> <li>8) Technical guidelines on Risk Assessment and Risk Management protocols agreed by mid-2007</li> <li>9) An internal “Manual on procedures for handling requests of LMOs in Egypt” produced and finalised by end 2007</li> <li>10) Organisation of four five-day training courses for 30 participants/course (administrative officers from Ministries, implementing bodies, including representatives of civil society and private sector) on handling requests for permits, including RA/RM</li> <li>11) Procedures for monitoring of environmental effects and enforcement actions are finalised by 2007</li> <li>12) A manual on monitoring for environmental releases is finalised by 2007</li> <li>13) Manual on procedures/ methodologies for monitoring of environmental effects and inspections prepared finalised and published;</li> <li>14) A five-day training course organised for 40</li> </ol>	<ol style="list-style-type: none"> <li>1) Baseline Survey (existing laws and regulations, record of research, trials and release of LMOs and products, etc.);</li> <li>2) Draft Biosafety Law reviewed and approved;</li> <li>3) Draft Executive Directive Regulations prepared;</li> <li>4) 75 officers and experts trained on the implementation of the Law and Regulations.</li> <li>5) Clearly defined entity for decision-making with clearly defined roles and responsibilities</li> <li>6) Responsibilities assigned for emergency responses, accidental release and illegal movement</li> <li>7) Clear definition of procedures for handling notification</li> <li>8) Technical Guidelines for RA/RM drafted;</li> <li>9) Draft Manual on procedures for handling requests prepared</li> <li>10) 120 administrative officers of Ministries, implementing bodies, civil society and private sector trained on handling requests for permits including RA/RM</li> <li>11) Procedures for monitoring of environmental effects and enforcement actions are finalised by 2007</li> <li>12) A manual on monitoring for environmental releases finalised</li> <li>13) Manual on procedures/ methodologies for monitoring of environmental effects and inspections published</li> <li>14) 40 custom officials and inspectors trained on LMOs investigation and inspection techniques</li> <li>15) Two reference laboratories established and supplied with additional material;</li> <li>16) Training guide for LMOs detection in laboratories, including sampling and analysis published;</li> <li>17) Two senior scientists and 10 selected staff of the two laboratories trained in LMO detection;</li> <li>18) Public education and involvement plan prepared and approved;</li> <li>19) Outreach material on biosafety prepared and disseminated;</li> <li>20) Biosafety committee web site set up and</li> </ol>

<p>custom officials and inspectors on LMOs investigation and inspection techniques;</p> <p>15) Survey of existing facilities at universities and research centres for designation of reference laboratories; Criteria/procedure for the selection and certification of two reference laboratories established; additional equipment purchased for the laboratories certified for LMOs detection, including post-release monitoring and enforcement,</p> <p>16) Training guide for LMOs detection in laboratories, including sampling and analysis drafted finalised and published;</p> <p>17) Two senior scientists trained for 10 days at a well- established laboratory in procedures for analysis and detection; Two training programs (2 weeks each) for 10 selected staff of the two reference laboratories in LMO detection carried out;</p> <p>18) Public education and involvement plan prepared and approved;</p> <p>19) Materials on biosafety prepared and disseminated;</p> <p>20) The biosafety committee web site set up and data entry protocols formulated and operational</p> <p>21) Two one-day workshops organised for 35 participants, including parliamentarians, media and NGO representatives on the Legislation and its implementing Directive</p> <p>22) Two two-day information workshops organised for 40 local administrators on public awareness education and involvement in biosafety.</p>	<p>data entry protocols formulated and operational</p> <p>21) 35 participants, including parliamentarians, media and NGO representatives informed on the Legislation and its implementing Directive</p> <p>22) 40 local administrators informed on public awareness education and involvement in biosafety.</p>
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## 4.2 The causal logic from Outputs to Outcome

31. As mentioned above, the exercise of reconstruction of the Theory of Change has permitted to identify and streamline the results framework of the Project, by grouping 22 Outputs in four clusters and identifying four Immediate/Direct Outcomes that contribute to the main Project Outcome (Diagram 1).

32. The setting and implementation of the National Biosafety Framework involves complex institutional changes and this complexity also reflects into the expected results of the Project. Actually, not only the Outcomes, but also some Outputs are of institutional nature, entailing regulatory measures (law, regulations and guidelines), mechanisms and procedures of participation, negotiation, coordination and institutional uptake (see, for instance, Outputs 2 to 7, 11 and 18). Evidently, these results may not strictly depend on Project's performance, since many other external factors are playing, and actually played, a crucial role, as previously described in chapter 3.5.

33. Moreover, due to their inherent institutional feature, some Immediate Outcomes are preliminary to others. It is difficult to implement a coherent administrative system (Outcome 2) and a follow-up, monitoring and enforcement system (Outcome 3), when the regulatory regime

(Outcome 1) is not in place (for instance, in absence of enforceable Law, Regulations and Guidelines). This is visualised by the traced horizontal arrows in Diagram 1.

34. **Key-drivers** in the pathway from Outputs to Immediate Outcomes have been the previous achievements of countries' stakeholders in defining the National Biosafety Framework (NBF), particularly the Draft National Law prepared since 2005, their championing role and resilience in an increasingly complex socio-political environment, as well as the incessant support of UN Environment in the whole process (see diagram 1).

35. The resilience of the national stakeholders has to be especially highlighted. Under difficult external circumstances, they have been able to catalyse and championing the Biosafety agenda in the country, by specifically supporting the participatory elaboration of the draft Biosafety Law and Regulations, the assessment of existing legal, procedural and technical gaps and needs and subsequently planning and implementing Capacity Building actions. Ad hoc committees and working groups have also played a relevant role, for instance in drafting technical guidelines and manuals.

36. The design of the Project was, nevertheless, based on a **key-assumption**, i.e. the approval of the Biosafety Law during Project life-time, which, did not materialize for the exceptional socio-political situation triggered by the "Arab Spring" and became an inescapable conditionality that has deprived the whole Project's design of its supposed corner-stone.

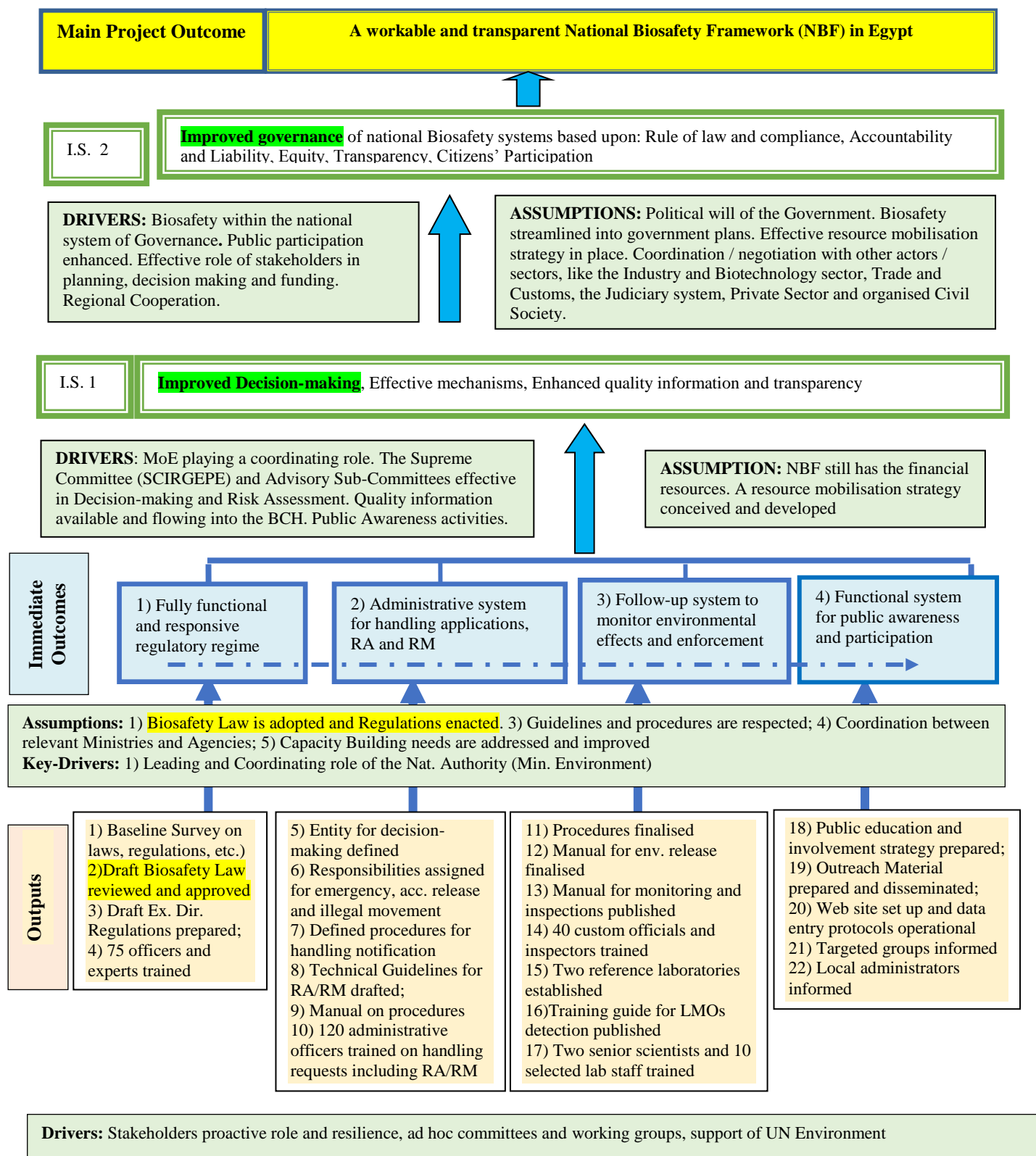
37. The four operational systems identified as Project's Immediate Outcomes can jointly contribute to improve the decision-making processes for LMOs approval (defined as the Intermediate State 1 to the Main Project Outcome). (IS 1). The clearness and solidity of the regulatory regime and the existence of effective participatory mechanisms for decision-making (Immediate Outcomes 1 and 4) are particularly relevant at this stage.

38. This Intermediate State is a crucial and demanding step for the operationalisation of the National Biosafety Framework (NBF), by requiring, on the one hand, the capacity to effectively carry-out the Risk Assessment exercise, which is a technically complex task, and, on the other hand, the willingness and capacity to consider the wider effects of the decision on the economic, social, cultural and political spheres.

39. Effective decision-making processes can lead to Intermediate State 2, i.e. the "Improved Governance of National Biosafety Framework", based upon rule of law and compliance, accountability and liability, equity, transparency and citizens' participation. This is also a complex and demanding stage that requires not only the full operationalisation of the four Immediate Outcomes, but also the coordination / negotiation with other actors / sectors that have their own agenda and system of governance, like the Industry and Biotechnology sector, Trade and Customs, the Judiciary system and the organised Civil Society sector. At this stage, the attitude, willingness, governance capacity and political agenda of decision-makers (Ministries, Government, Parliament) play a substantive role.



**Diagram 1: Reconstructed Theory of Change (TOC) from Outputs to Outcomes**



### 4.3 The pathway from Outcome to Impact

40. The intended impact of the project is the Global Environmental Benefit (GEB)<sup>10</sup> to which it contributes: the enhanced conservation and sustainable use of biological diversity in Egypt. The pathway from Outcome to Impact also contemplates Intermediate States (IS).

41. The full operationalisation of the National Biosafety Framework (Main Project Outcome) will allow the country to fulfil its obligations pursuant to the Cartagena Protocol on Biosafety (CPB), as expressed in Art. 1 of the Protocol (see diagram 2), which has been identified as the Intermediate State 3 (IS 3). This step implies that the country has the capacity to sustain and gradually upgrade its operational National Biosafety Framework (NBF) as a response to new challenges and priorities emerged at country level, and in accordance with COP-MOP11 decisions and recommendations regarding any specific subject contemplated in the Protocol. Regional and International cooperation may play a relevant role at this level.

42. Biosafety has also to be meaningfully integrated in the strategy and plans that the country has identified for the sustainable use of its natural resources, including Biodiversity. The National Biodiversity Strategy and Action Plan (NBSAP) is currently the main strategic instrument for the purpose. This is reflected in the Intermediate State 4 (IS 4) of Diagram 2 here below. Intermediate States 3 and 4 are not sequentially linked, but jointly contributing to Impact. Main key-driver for Int. State 4 is the Biosafety National Strategic Plan 2017-2022 that has been prepared and is being finalised.

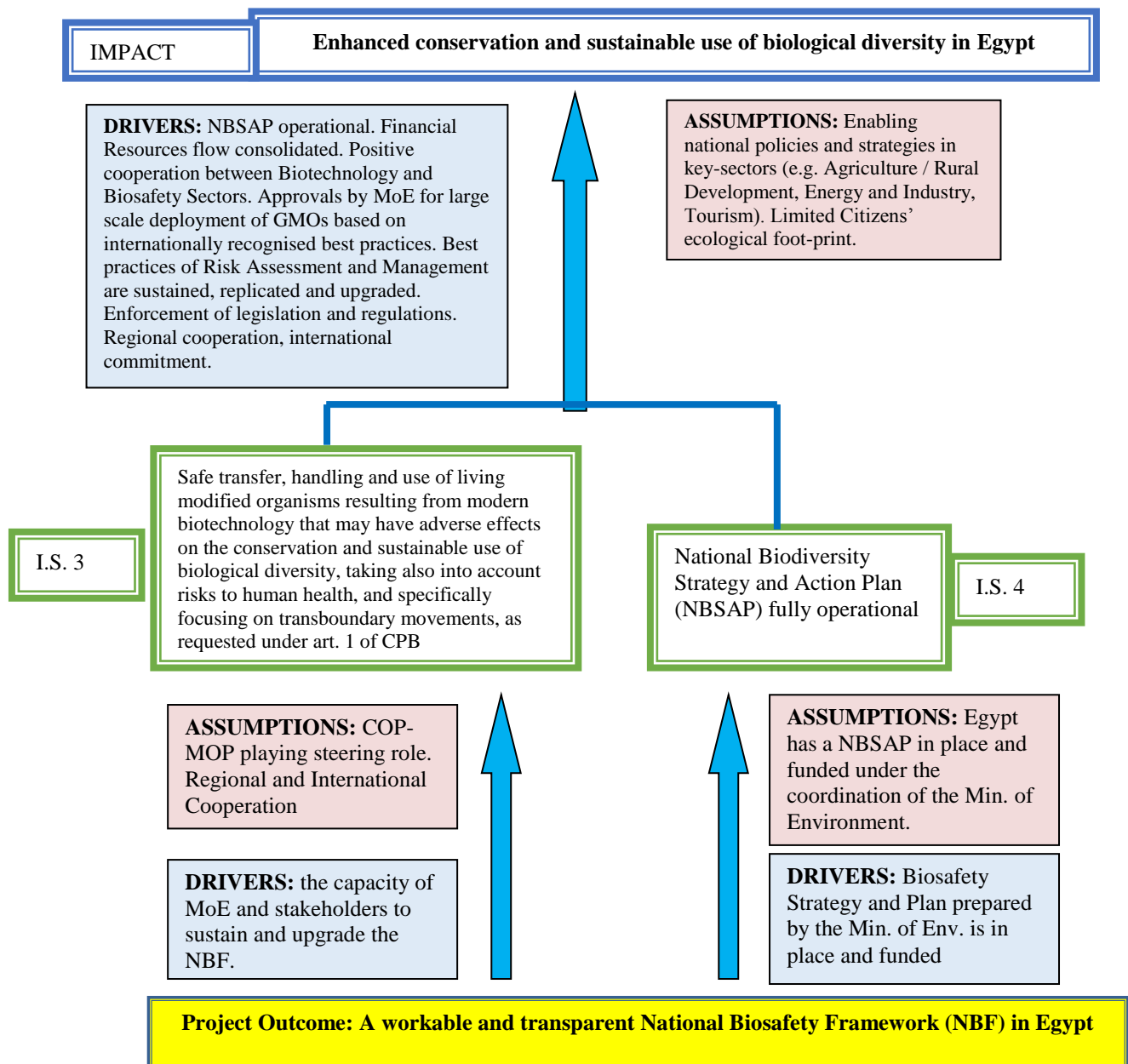
43. Biodiversity conservation depends also on the impact that other actors / sectors have on the Environment, such as, among others, Agriculture/Rural Development policies, Energy and Industry sectors and Tourism development, as well as on Citizens' foot-print caused by their behaviour. This aspect is also reflected in Diagram 2.

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<sup>10</sup> The primary aim of the GEF, and of GEF projects, is to achieve a specific category of impacts that are often referred to as —Global Environmental Benefits (GEB). GEB can be defined as the “Lasting improvements in the status of an aspect of the global environment that safeguards environmental functioning and integrity as well as benefiting human society” (GEF Eval. Office, 2009).

<sup>11</sup> Conference of the Parties serving as the Meeting of the Parties to the Cartagena Protocol on Biosafety

**Diagram 2: Reconstructed TOC from Main Project Outcome to Impact**



## 5 Findings

### 5.1 Strategic relevance

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

44. At the time of Project design, UN Environment was playing a strategic role of Implementing Agency of the Global Environment Facility (GEF) by supporting more than 120 countries worldwide in developing and implementing their National Biosafety Frameworks, among them Egypt. Nonetheless, Biosafety was not yet formally and explicitly recognized as thematic priority in any of UN Environment's instruments of strategic planning that were, in those years, also in a phase of progressive restructuring.

45. Eventually, Biosafety was contemplated in the Biennial PoW 2010-11, Sub-Programme Environmental Governance, Expected Accomplishment (EA) B: "The capacity of States to implement their environmental obligations and achieve their environmental priority goals, targets and objectives through strengthened laws and institutions is enhanced". As a matter of fact, the Project, despite being conceived and formulated prior to that date, perfectly fits in the Sub-Programme and has largely contributed to the Programme of Work 2010-11, as visualised in the following table.

**Table 6: Contribution of the Project to the Programme of Work**

Programme of Work 2010-11	Contribution of the Project
<u>Output 2 of the PoW 2010-11</u> : "Legal and policy instruments are developed and applied to achieve synergy between national and international environment and development goals".	<ul style="list-style-type: none"><li>- Overall support to the implementation of the NBF</li><li>- Draft Biosafety Law and Regulations</li><li>- Guidelines</li></ul>
<u>Output 3 of PoW 2010-11</u> : "Countries' legislative and judicial capacity to implement their international environmental obligations is enhanced through implementation of policy tools". More specifically: 1) "The capacities of countries in risk assessment and management of modern biotechnology products under the biosafety programme is enhanced" and 2) "Capacity-building and support are provided to developing country Parties to enable their participation in the Cartagena Protocol's Biosafety Clearing House".	<ul style="list-style-type: none"><li>- Overall support to the implementation of the NBF</li><li>- Guidelines on different issue related to Biosafety, including Risk Assessment and Management</li><li>- Capacity Building in Risk Assessment and Management</li><li>- Capacity building and outreach activities of Public Awareness and Information</li><li>- National website linked to BCH</li></ul>
<u>Output 4 of PoW 2010-11</u> : "Capacity of government officials and other stakeholders for effective participation in multilateral environmental negotiations is enhanced".	<ul style="list-style-type: none"><li>- Overall support to the implementation of the NBF</li><li>- Capacity Building in Risk Assessment and Management</li><li>- Capacity building and outreach activities of Public Awareness and Information</li></ul>

#### 5.1.2 Alignment to UN Environment /GEF Strategic Priorities

46. The Strategy for Financing Biosafety was approved by the GEF Council on an interim basis in December 2006 and became part of the GEF Focal Area Strategies and Strategic Programming for GEF-4 approved by the GEF Council in June 2007 (Focal Area 3: Biodiversity; Strategic

Programme 6: Biosafety). The current Project was therefore elaborated and funded prior to that date, under the Operational Programme “Biodiversity”.

47. According to data in GEF web site, Biodiversity sector represents around 11% of GEF portfolio in the country, which is highly focussed on Climate Change (65% of GEF portfolio). International Waters is another relevant sector (13% of the portfolio). During the GEF-5 replenishment period (July 2010 – June 2014), Egypt received an indicative allocation to formulate and execute projects for about USD 4.6 Million in biodiversity, USD 14.5 Million in climate change, and USD 1.5 Million in land degradation. The Project under current evaluation, which makes part of the Biodiversity Portfolio, is therefore also strategically relevant to current GEF priorities.

48. Given its focus on Capacity Building and, to some extent, on Technology Support (for instance training in Risk Assessment, Risk Monitoring, Laboratory), the Project is also surely aligned with Bali Strategic Plan (BSP). The project has been active in addressing many of the cross-cutting issues listed in Section D of the Plan, such as the Strengthening of national institutions, the Development of national law and regulations and the Compliance with obligations under multilateral environmental agreements.

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

49. Egypt is among the most advanced developing countries in the adoption and use of agricultural biotechnology. A recent survey (posted by the Project onto ANUBIS)<sup>12</sup> refers that the National Biosafety Committee has “treated” so far “67 permits to different institutions and private companies. They are 34 permits for release in bio-containments experiments, 32 permits to open field experiments and one permit for marketing”. These data show the relevance of the problem to be addressed and the impelling need of a Regulatory and Administrative System for Biosafety in Egypt.

50. Transboundary movements for placing into the market GMOs Food and Feed is also a crucial issue taking into account that Egypt is a net food-importer country and has a huge potential market of consumers. It has also to be mentioned that neighbouring Sudan has already authorised the deliberate release (cultivation) of three GMOs varieties of cotton. This is why a fully operational Biosafety Framework is absolutely needed, to allow Egypt complying with its national and international obligations in the field of safe transfer, handling and use of living modified organisms.

### **5.1.4 Complementarity with Existing Interventions**

51. As mentioned before, Egypt is devoting significant efforts and implementing several projects to protect its Natural Resources of its unique ecosystems. The recent Egyptian Biodiversity Strategy and Action Plan (2015-2030) is a tangible and comprehensive instrument for that purpose.

52. The implementation of the National Biosafety Framework is a significant opportunity to create synergies and to contribute to the Sustainable Development of the country, particularly to the Strategic Goal 3 of the mentioned Action Plan 2015-2030: “Access to genetic resources and Benefit sharing (Nagoya protocol, indigenous knowledge and traditions)”, namely Target 10: “By 2020, Effective operational biosafety and ABS mechanism (measures and legislation) in place, in accordance with national laws and relevant international obligations and serving national priorities

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<sup>12</sup> Executive Summary available in English

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

## **5.2 Quality of Project Design**

53. The Project Design Quality (PDQ) was assessed in the Inception Report of the Evaluation, through the detailed "Template for the assessment of the Project Design Quality (PDQ)" prepared by UN Environment Evaluation Office, which contemplates a rating system, based on a six-point scale: Highly Satisfactory (6), Satisfactory (5), Moderately Satisfactory (4), Moderately Unsatisfactory (3), Unsatisfactory (2), Highly Unsatisfactory (1), also in use for the main evaluation.

54. The Project Document provides a quite exhaustive description of the various national stakeholders, yet lacks a more analytic approach, making difficult to understand needs and priorities of the actors involved, as well as links, dynamics, actual and potential synergies and / or conflicts between them and their respective agendas for OGMs and Biosafety.

55. The Relevance of the Project to National, GEF and UN Environment mandate is fairly discussed. However, crucial aspects like the Results Causality, the Logical Framework and Risk Identification are not very consistent. At the time of Project formulation, the definition of the Outputs was not requested and the Logframe essentially presents a list of Activities. There is also misinterpretation of terms between outcomes, outputs, indicators, targets and activities. Appendix 6 of the ProDoc (Results Framework) and App. 4 (Key deliverables and milestones) present contradicting elements. Some crucial risks were identified, such as "the regulatory regime cannot be easily finalised because of lack of government support", yet, the publication of the Law in the Official Gazette was optimistically put as a target in the first year of the Project. The measures for risk reduction or mitigation were also insufficient (e.g. training, manuals, etc.). Overall, the Quality of Project Design was rated, at that time, Moderately Unsatisfactory (MU).

## **5.3 Nature of the External Context**

56. As discussed in chapter 3.5, the Project has been extremely challenged by the political events of the so-called "Arab spring", which created an extraordinary socio-political situation for years, which, in turn, triggered extremely unworkable institutional frameworks. A significant normalisation of the political situation was registered from 2015 on. Overall, the external context of the Project has been evaluated Moderately Unfavourable.

## **5.4 Effectiveness**

### **5.4.1 Outputs delivery**

57. The delivery of Outputs described in the Final Report of the Terminal Evaluation carried out in 2015 has been updated through the table "Final Project Output summary" recently produced by the Project Team and posted in ANUBIS (December 2017). Main findings can be summarized as follows:

*Outputs 1, 2, 3 and 4 (Diagram 1, Theory of Change) related to the Immediate Outcome 1 (A fully functional and responsive regulatory regime)*

58. After an exhaustive baseline assessment, the Draft Biosafety Law was prepared, largely discussed and reviewed in the first years of the Project (2008-2010). The uprising of the so-called "Arab Spring" (2010) has then created an extraordinary socio-political situation, also paralysing the activity of the Parliament that resumed its activities only in January 2016. The draft Law was

eventually approved by the Cabinet of Ministers in July 2015 and is currently being revised by the cabinet's Judicial Reform Committee, prior to submission to the parliament of Egypt for endorsement, which is expected to occur in 2018.

59. The Final Draft Executive Directive Regulations, also prepared and thoroughly reviewed by all relevant stakeholders, have been recently revised in line with the new country constitution and will be adjusted to the final law after promulgation. A significant number of governmental stakeholders have been matched by training and awareness activities regarding the content of the Law.

60. The Competent National Authority (Ministry of Environment), is a consolidated institution and is fully operational, though waiting for formal mandate on Biosafety under the new Law to be approved. A Biosafety Unit has been established in the structure of the Ministry to follow the implementation of the Cartagena Protocol.

61. To support the enactment of the Law and Regulations by the new Parliament, the Project has produced two relevant surveys, one regarding the "Current status of trials and releases of LMO material in closed and open environments in Egypt" (mentioned in chapter 5.1.3 above) and the other regarding "Current practices of the National Biosafety Committee and its impact on Biosafety in Egypt".

62. The Project has recently prepared a National Strategic Action Plan (2017-2022) for Biosafety to implement activities and ensure sustainability and flow of work of the National Biosafety Framework in place, which can be a relevant tool for progressing towards Impact, as outlined in chapter 4.3 and visualised in Diagram 2 (Pathway to Impact).

*Outputs 5 to 10 (Diagram 1, Theory of Change) related to the Immediate Outcome 2 (A functional national system for handling request for permits for LMOs)*

63. Procedures, roles and responsibilities for handling requests of GMOs authorisations and for decision-making are clearly defined in the Biosafety Law to be approved. The Competent National Authority for Biosafety (the Ministry of Environment, MoE)<sup>13</sup>, namely the Nature Conservation Sector, is the "single window" responsible for receiving, reviewing and preparing the GMOs applications' dossier, to be delivered to the Supreme Committee on Intentional Release of Genetically Engineered Products into the Environment (SCIRGEPE), which is the decision-making body. The Supreme Committee is composed by representatives of eight line-ministries involved in biosafety framework, eight experts and the chairman, and is supported by sub-committees.

64. Technical Guidelines / Protocols for Risk Assessment and Risk Management have been reviewed and approved by the National Coordinating Committee (NCC) of Biosafety stakeholders and a Ministerial decree has been prepared to endorse them. A Roster of Experts (including 70 national experts) has also been prepared.

65. The Draft of a Risk Assessment Manual has been prepared in alignment with COP-MOP8 decisions, to be approved and declared an official instrument for the purpose. A draft of a technical Manual on procedures for handling requests has been prepared as well, and largely discussed through consultation meetings with legal and administrative authority.

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<sup>13</sup> Ministry of State for Environmental Affairs / Egyptian Environmental Affairs Agency (EEAA)

66. Several trainings on risk assessment and risk management have been carried out beyond the planned targets, including one training organized in Austria for six senior administrative officers from the Executing Agency (Min. of Environment) on the administrative processing related to the handling of requests. High-level members of Egyptian delegations have participated in COP-MOP8 to follow actions and discussions related to risk assessment and risk management, socio-economic considerations, unintentional transboundary movements and emergency measures.

*Outputs from 11 to 17 (Diagram 1, Theory of Change) related to the Immediate Outcome 3 (Follow-up system in place to monitor environmental effects and enforcement)*

67. The establishment of GMOs detection reference laboratories has been a priority for the country. A survey of existing facilities for reference laboratories at universities and research centres was carried out, four centres were shortlisted and finally three were selected. The three Reference Laboratories have been chosen (instead of the two initially planned) to cover different and complementary sectors and have been matched by upgrading activities (training, additional equipment and material). The Ministry of Environment has signed a Protocol of collaboration with each of them. They are:

- The Central Lab. of the Min. of Health, which is the only one accredited in the country for Food analysis and coordinates a network of 27 satellite-lab throughout the country;
- The Laboratory of the Faculty of Agriculture (University of Cairo), a well-equipped laboratory supporting researchers and students in different areas (microbiology, genetics, biotechnology, etc.);
- The Laboratory of Alexandria (in the City of Science & Technology) that will permit to decentralise inspections and analyses, particularly addressing the need for a lab in the major import sea ports.

68. Capacity building included the production of a Training Guide for LMOs detection in laboratories, one international training workshop organized in Austria for senior scientists from the reference laboratories and three training workshops for 12 specialists of the three laboratories.

69. A manual on procedures/methodologies for monitoring of environmental effects was prepared to guide inspectors during inspection missions, which are performed through cooperation of the Competent National Authority with Ministry of Agriculture, Ministry of Health and Customs. Inspection officers have been trained on investigation and inspection techniques.

*Outputs from 18 to 22 (Diagram 1, Theory of Change) related to the Immediate Outcome 4 (A functional national system for public awareness, education, participation)*

70. A plan for public education, awareness, participation and access to information has been formulated and is being implemented at different levels. Under the umbrella of this action plan, a Communication, Education and Public Awareness programme is being developed for raising the capacities of administrators and stakeholders of involving Civil Society sector and the Public in general on issues related to biosafety, including the decision-making process. The National website (National Biosafety Clearing-House)<sup>14</sup> has been set, as well as a data entry protocol.

71. Several information workshops for different target groups have been organised, such as governmental agencies, members of the Parliament, the Media, Universities and high-schools' students, as well as the Private Sector including Farmers. Fact sheets and other kind of outreach

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<sup>14</sup> [www.egbch-eg.com](http://www.egbch-eg.com)



material have also been prepared and disseminated. Particular attention has been devoted to events addressing youth (page Facebook already in place, links with Egyptian Federation for Scouts and Girl Guides), journalists and environmental NGOs.

### ***Final remarks on Outputs delivery***

72. Relevant Outputs have been produced in a difficult institutional context. They represent a valuable, ready-to-use asset that will enable the implementation of the NBF, once the institutional conditions are in place, particularly the approval of the Law. All the above considered, Outputs achievement is rated **Satisfactory (S)**.

### **5.4.2 Achievement of Outcomes**

73. The work of the Project along ten years has undoubtedly produced the progressive creation of the main “building blocks” of the Framework, as also reflected in the satisfactory delivery of the expected Outputs. The Evaluation has to assess to what extent the actual delivery of the Outputs has produced, or have the potential to produce in the short-medium term, the institutional changes and systemic effects (Immediate Outcomes) resulting in a “workable and transparent National Biosafety Framework” (Main Outcome).

74. As visualised in Diagram 1 of the TOC, the pathway from Project Outputs to the Main Project Outcome is a complex process with different stages of implementation and of results’ achievement. Complexity is increasing when proceeding upwards in the pathway to Outcome and that is also evident in the case of Egypt for two main and inter-related reasons:

- a) the complexity of the overall socio-political situation of the country, as discussed in chapter 3.5, which has put an extraordinary burden on the Project;
- b) the controversy around the GMOs issue, which brought about a prolonged consensus building among the various stakeholders.

75. The delays in the discussion and approval of the Regulatory regime (Law and Regulations) are an evident example of the result of these two limiting factors. As a consequence, the consistency between the binding timeframe of the Project and the dynamics and timing of governance processes of the country, has been strongly challenged.

76. As a matter of fact, in 2015, the Egypt National Biodiversity Strategy and Action Plan 2030 (NBSAP) had pointed out some relevant weaknesses to be addressed for the full implementation of the National Biosafety Framework, among them (we quote): “No legislation to control the national, or international movement of GMOs and give the rights to public to monitor these GMOs; little capacity to assess the risks of biotechnology use; poor understanding of how to prevent the accidental release of GMOs in to the environment, and low capacity of how to respond in this situation; lack of participation of local communities.” The same year, the Terminal Evaluation of the project had rated “unsatisfactory” the effectiveness of the Project (Outcomes achievement).

77. Two years later, although the approval and setting of the Regulatory regime remains an unfulfilled preliminary assumption, relevant drivers for the progress of the National Biosafety Framework (NBF) towards the Immediate Outcomes and Intermediate State 1 (Improved Decision-making, see Diagram 1) are tangible, such as:

- the enhancement of the role of the Competent Nat. Authority (the Min. of Environment);
- the long and steady involvement of a number of key-stakeholders in the whole process of definition of the Regulatory regime (law, regulations, guidelines, etc.). They

will be key-players in the Supreme Committee for GMOs Decision-making (SCIRGEPE, see previous chapter);

- the involvement and capacity building of a significant group of national experts that will assess the Committee in Risk Assessment and Decision-making;
- the increased Public Awareness, Information and transparency on Biosafety.

78. The improvement of Project's performance in the last two years can be ascribed to two main factors:

- the stabilisation of the socio-political and institutional context of the country;
  - the progress of the Project in the formulation of some strategic documents, like the Biosafety National Strategic Action Plan (2017-2022), the Communication, Education and Public Awareness programme and a resource mobilisation strategy, which have provided the Project with a clearer vision on the "way forward", than it was two years ago.

79. Once the Biosafety Law is approved, the drafted Executive Regulations, as well as the technical guidelines and institutional arrangements prepared so far, should be reviewed for fully adhering to the Law. That will entail renewed Capacity Building actions addressing national stakeholders with emphasis on the Judiciary sector, for the smooth implementation of the Law.

80. Once the whole Regulatory regime is in place, the Biosafety Framework could progress towards its full operationalisation (Main expected Outcome). As visualised in Diagram 1, that will entail the setting of the Decision-making process established by the Law and Regulations (Intermediate State 1), as well as the setting and functioning of mechanisms of Biosafety Governance within the overall Governance system of the Country (Intermediate State 2), including the coordination and negotiation with other sectors and a strategy for resources mobilisation. Capacity building programme, manuals and guidelines produced so far will have to be updated and upgraded in accordance with emerging priority and needs, as well as with next COP-MOP decisions and new technologies.

81. Given the strong interest of different private and public actors in introducing GMOs in the country, also for environmental release (see Chapter 5.1.3), these two intermediate steps will be crucially challenging for the operationalisation of the Framework, as also discussed in chapter 5.8 (Sustainability). Relevant assumptions exist, as discussed in chapter 4.2 and visualised in Diagram 1, such as the Political will of the Government, the need to streamline Biosafety within government plans, to conceive and implement an effective resource mobilisation strategy, and the coordination and transparent negotiation with a range of actors / sectors that have their own agenda and system of governance, like the Biotechnology sector, Trade and Customs, the Judiciary system and the organised Civil Society sector, among others.

82. As discussed here above and visualised in Diagram 1, the Project has remarkably progressed towards the achievement of its expected Immediate Outcomes, with the exception of the key-outcome regarding the Regulatory regime. The achievement of the Main Outcome has still to be proved under the concrete challenges of the Decision-making process and the overall Governance of the Framework. Everything considered, Outcomes achievement can be rated, so far, **Moderately Satisfactory (MS)**.

#### **5.4.3 Likelihood of impact**

83. The possible pathway from the Project Outcome to the intended Impact of the Project has been visualised in Diagram 2 (Chapter 4.3). Despite the Main Project Outcome has not been fully achieved so far, there are encouraging signs, pointing out that the country is giving significant steps towards Impact. On the one hand, a National Strategic Action Plan (2017-2022) for Biosafety

is being prepared and finalised to ensure sustainability and flow of work of the National Biosafety Framework in place (see Driver for Int. State 4 in Diagram 2).

84. On the other hand, the Egypt National Biodiversity Strategy and Action Plan 2030 (NBSAP), in its Strategic Goal 3, under the theme “Access to genetic resources and sharing of benefits (Nagoya protocol and Cartagena Protocol)” has, in fact, identified the following relevant challenges (we quote):

- Carry out stock-taking and assessment of existing biotechnologies application and use;
- Building the capacity of National Conservation Sector (MoE) as the entity responsible for the management and control of biotechnology and biosafety issues;
- Build up National Biosafety Database and operational BCH;
- Normalize, manage or control the risks associated with the use and release of LMOs. (unquote)

85. The Project has, in fact, already delivered relevant Outputs regarding some of the priorities outlined above, such as the survey on the “Current status of trials and releases of LMO material in closed and open environments in Egypt”, the capacity building of the Competent National Authority (MoE), the roster of Biosafety Experts and the setting of the national BCH.

86. According to its TOR, the Evaluation has to assess the likelihood of the Project to achieve the expected Impact, by using the rating scales of Table 7 and 8 that follow, which basically combines Project Outcome achievement with the progress towards superior levels, the so-called Intermediate States towards Impact (see Diagram 2 in chapter 5.4.2). Based on the analysis presented in the previous chapter (5.4.2), Option D looks the most appropriate (because of the lack of a key-Outcome, the Regulatory regime).

87. The progress towards Impact has started, since some significant steps have been given, particularly in the area of strategic planning (the Biosafety Plan and the inclusion of Biosafety in the NBSAP), yet, it is too early to assess whether they will steadily progress towards the intended long-term Impact. The evaluation deems that the most appropriate rating is “B”. As a result, the aggregate rating is DB, which, according to following Tables 7 and 8, would indicate that the Project is **Likely to achieve the intended Impact (L)**.

**Table 7: Rating scale for outcomes and progress towards ‘intermediate states’**

Outcome Rating	Rating on progress toward Intermediate States
D: The project’s intended outcomes were not delivered	D: No measures taken to move towards intermediate states.
C: The project’s intended outcomes were delivered, but were not designed to feed into a continuing process after project funding	C: The measures designed to move towards intermediate states have started, but have not produced results.
B: The project’s intended outcomes were delivered, and were designed to feed into a continuing process, but with no prior allocation of responsibilities after project funding	B: The measures designed to move towards intermediate states have started and have produced results, which give no indication that they can progress towards the intended long-term impact.
A: The project’s intended outcomes were delivered, and were designed to feed into a continuing process, with specific allocation of responsibilities after project funding.	A: The measures designed to move towards intermediate states have started and have produced results, which clearly indicate that they can progress towards the intended long-term impact.

**Table 8. ‘Overall likelihood of impact achievement’ on a six-point scale.**

Highly Likely	Likely	Moderately Likely	Moderately Unlikely	Unlikely	Highly Unlikely
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AA AB BA CA BB+ CB+ DA+ DB+	BB CB DA <b>DB</b> AC+ BC+	AC BC CC+ DC+	CC DC AD+ BD+	AD BD CD+ DD+	CD DD
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## 5.5 Financial management

88. All the dimensions of the financial management have been satisfactorily addressed by the Project (see table below). Information about actual project costs and co-financing used have been supplied “on the spot” by the Project Administrative Assistant (see financial tables in chapter 3.6) during the country visit and updated during the Follow-up exercise in December 2017.

89. As a result of the delays in the implementation of the activities, as described in chapter 3.5, the rate of expenditure of the budget allocated has been 62% until June 2017 (see Table in chapter 3.6), corresponding to 560.035 USD. The total of the advances already received by the Project from UN Environment amounts to 643.702 USD.

90. The rate of expenditure of the budget up to 2015, at the time of the Terminal Evaluation, was 34%, confirming the significant increase of activities in the last two years.

**Table 9: Financial Management Table**

Financial management components:		Rating *	Evidence/ Comments
<b>Questions relating to financial management across the life of the project:</b>			
Compliance with financial requirements and procedures of UN Environment and all funding partners (including procurement rules, financial reporting and audit reports etc)		S	- Financial reports have been regularly provided (quarterly) and are filed in ANUBIS platform. - Final Inventory has been prepared and uploaded in ANUBIS (December 2017). - Audit Reports have been regularly carried-out up to 2013.
Timeliness of project financial reports and audits		S	
Quality of project financial reports and audits		S	Up to the standard
Contact/communication between the PM/TM & FMO		HS	Through Periodic Progress Reports, Financial Reports, field visits of the Task Manager and constant communication (email). Participation to the annual meetings of the NPCs.
PM/TM & FMO responsiveness to addressing and resolving financial issues		S	
<b>Questions relating to financial information provided during the evaluation:</b>			
Provision of key documents to the evaluator (based on the provision of A-F below)		S	
A.	An up-to-date 'Co-financing and Project Cost's table	Yes	Produced in real time by the Administrative Assistant of the Project during the Evaluation (2015) and updated in December 2017
B.	A summary report on the project's annual financial expenditures during the life of the project.	Yes	Produced in real time by the Administrative Assistant of the Project during the Evaluation
C.	Financial documents from Mid-Term Evaluation/Review (where appropriate)	Not appl	
D.	All relevant project legal agreements (e.g. SSFA, PCA, ICA) – where appropriate	Yes	In ANUBIS and at the Project Office, during the Evaluation
E.	Associated financial reports for legal agreements (where applicable)	Not appl	

Financial management components:		Rating *	Evidence/ Comments
F.	Copies of any completed audits	Yes	Available in ANUBIS
Demonstrated knowledge by the PM/TM & FMO of partner financial expenditure		HS	
PM/TM & FMO responsiveness to financial requests during the evaluation process		HS	
<b>Overall rating</b>		<b>HS</b>	

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

PM/TM Project Manager/Task Manager

FMO Financial Management Officer

## 5.6 Efficiency

91. The Projects has made large use of existing national expertise and have built upon previous achievements. Project's Assistants (for Operations and for Administration) have been shared with another GEF / UN Environment Project and this solution has to be considered efficient, both in terms of allocation of financial and of human resources. All the senior scientific advisors that have greatly contributed to the setting of the regulatory regime (draft law and regulations), the preparation of technical guidelines and to the process of survey and selection of the laboratories, have been hired by the Project only once for the initial baseline-surveys and have successively granted their technical assistance on a voluntary basis.

92. The exhaustive survey of existing facilities for GMOs detection (laboratories) has permitted to identify three national laboratories with high installed capacities for that task, just in need of some supplementary equipment and capacity building. That has brought about a remarkable cost saving, since the expenditures for that component of the Project have been 16% of the GEF allocated budget.

93. From all the above, the form of adaptive management adopted by the Project can be considered highly Cost-Effective. Of course, due to the protracted extensions (80 months), Time-Efficiency has been hugely challenged. Overall, Project Efficiency is rated **Satisfactory (S)**.

## 5.7 Monitoring and Reporting

94. As mentioned in chapter 5.2 (Project Design), the Logframe of the Project and the other methodological tools for the Monitoring and Evaluation of the Project (e.g. the "M&E Plan" and the "Key deliverables and milestones") were not properly coherent to one another. The Monitoring and Evaluation (M&E) Plan was not costed and the Project budget did not include provisions for this component.

95. The Project Document did not clearly identify and foresee the setting of a comprehensive Monitoring System, except: a) the Mid-term Review carried out by the Task Manager (TM); b) the follow-up and supervision of the TM, which was actually very assiduous, and c) the monitoring of the Project's activities by the Project Team and the Steering Committee. However, a comprehensive Project Monitoring system by results was not conceived and implemented.

96. GEF/UN Environment tools for Progress Reporting have been regularly implemented, transmitted and filed in ANUBIS, along with a number of technical documents and other information regarding Project implementation. GEF Tracking Tools concerning Outcomes achievement have not been implemented (not requested at the time of Project formulation).

97. National stakeholders consider UN Environment supervision and backstopping of high quality, for three main reasons:

- The technical and administrative backstopping of the Task Manager has been constant and effective, through prompt replies (through skype and email) to any doubt or question on financial issues, on the use of the platform ANUBIS, as well as by providing technical advice on substantive issues related to project execution;
- The constant support received through the field missions of UN Environment Task Manager, particularly the Mid-term Review, the in-site visit to laboratories in Alexandria and the peer review of training on GMO Detection;
- The organization of the yearly meetings at regional level that have allowed the technical and administrative updating and information exchange of both the Project Assistant and the Financial Assistant, as well as providing opportunities to learn about new trends in Biosafety, developments under the Cartagena Protocol on Biosafety and the GEF as a funding mechanism.

98. As visualised in the Rating Table in Chapter 6.1.1, the rating of the components of the System is uneven, and the overall rating is, everything considered, **Moderately Satisfactory (MS)**.

## 5.8 Sustainability

99. Three aspects of sustainability have been addressed: a) Socio-political sustainability, b) Financial sustainability and c) Institutional sustainability.

### 5.8.1 Socio-political sustainability

100. The development of Biotechnology sector in Egypt is significant and the need for boosting agricultural development and coping with a rapidly increasing demand for food and feed is high. Socio-political sustainability of the Biosafety agenda in the country will largely depend on the national capacity to establish and enhance the dialogue and cooperation between Biotechnology and Biosafety sectors, as well as with different societal sectors, particularly with Private sector (Commercial and Small farmers) and with Civil Society.

101. It is the opinion of the Project Team<sup>15</sup> that challenges exist for the socio-political sustainability of the Framework, regarding, namely, the long procedures for the law endorsement, bureaucratic delay at several levels, unforeseen circumstances (political situation) and conflicts that may arise among stakeholders. That notwithstanding, Socio-political Sustainability is considered **Moderately Likely (ML)**, under the conditions that transparency, information availability, accessibility and sharing, as well as civil society and private sector engagement, will be fostered and promoted by the Competent National Authority.

### 5.8.2 Financial sustainability

102. The National Biodiversity Strategy and Action Plan ("NBSAP to 2030") has been finalised in 2015 and includes Biosafety as a priority area. The National Environmental Action Plan (2002-2022) also includes Biosafety. That means that national planning instruments are in place allowing the Government to introduce Biosafety programmes in its Medium-Term Budget Planning. Of course, financial sustainability will depend on the effective allocation of funds to Biosafety.

103. The Competent National Authority (MoE) has also formulated the Biosafety Strategic Action Plan including a Resource Mobilisation programme that should be the main instrument to

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<sup>15</sup> Communicated to the Consultant on occasion of the Follow-up of the Terminal Evaluation (14/12/2017)

plan and negotiate internal and external financial resources. Limited availability of the required financial resources, according to the National Project Coordinator, remains a concern. Overall, Financial Sustainability is rated **Moderately Likely (ML)**.

### 5.8.3 Institutional sustainability

104. The final adoption and entry into force of the Biosafety Law will produce the legal framework that will help building up institutional arrangements and procedural mechanisms that the Project has been preparing during its lifetime. Reasons for optimism exist, because the coordinating mechanisms established with the support of the Project (for instance, the National Coordinating Committee) have been so far successful in overcoming technical, procedural and institutional problems related to Biosafety and have included nine line-Ministries (Environment, Agriculture & Land Reclamation, Health, Justice, Foreign Affairs, Finance, International Cooperation, Higher Education and Scientific Research & Technology).

105. The Law to be approved foresees the creation of the Supreme Committee on Intentional Release of Genetically Engineered Products into the Environment (SCIRGEPE), which is the decision-making body on GMOs applications and is composed by representatives of the nine line-ministries that have been involved through the Project in defining and implementing the National Biosafety Framework. Institutional Sustainability is rated **Likely (L)**.

## 6 Conclusions and Recommendations

### 6.1 Conclusions

106. Egypt, one of the most advanced developing countries in the adoption and use of agricultural biotechnology, was included as one of the eighteen countries piloting the GEF-funded “Biosafety Enabling Activity” since 1999. The country ratified the Cartagena Protocol on Biosafety in 2003 and the Ministry of Environment (MoE), through the Egyptian Environmental Affairs Agency (EEAA), became the Competent National Authority (CNA) for the Protocol implementation.

107. Under the coordination of the new CNA, a National Committee representing the main Ministries and other relevant institutions was put in place and a draft Biosafety Law was prepared by early 2004. In fact, the Project “Support for Implementation of the National Biosafety Framework (NBF) for Egypt” was conceived in those years to complete and implement a comprehensive National Biosafety Framework that would include the regulatory, administrative and enforcement systems, hence making fully operational the Law to be approved. According to the Project Document, the draft Biosafety Law was “due to be approved by the People’s Assembly during the development of the Project”.

108. As described in chapter 3.5, the Project started its operations in 2007 with an initially planned duration of four years and entered in its full implementation phase in 2008. The existing draft of the Biosafety Law prepared in 2004 became the focus of an intense discussion and political negotiation eventually leading to a consensual Draft Law in 2010, endorsed by nine line-Ministries, to be sent to the Prime Minister Cabinet for the preliminary approval by the Government. That coincided with the uprising of the so-called “Arab Spring” and the subsequent political instability of the country, which has produced and protracted an unworkable institutional framework that has strongly affected Project’s implementation from 2010 to 2014. A new Government was formed in 2015 and in January 2016 the Egyptian Parliament resumed its activities.

109. As outlined in chapter 5.4.1 (Outputs delivery), the Draft Biosafety Law was discussed again among the stakeholders and approved by the new Cabinet of Ministers in July 2015. It is currently being revised by the cabinet's Judicial Reform Committee, prior to submission to the Parliament of Egypt for approval, which is expected to occur in 2018.

110. As a result of all the above, several extensions for a total of 80 months have been granted, shifting the official completion date to 29/06/2017, as well as 16 Budget Revisions, mostly to reallocate unspent money. The option of going to a Project Suspension by "*force majeure*" was not taken into consideration by the Project Team and this issue is discussed in following chapter "Lessons Learned".

111. As described in the Explanatory Note at the beginning of this report, a Terminal Evaluation (TE) of the Project was planned and carried out at the end of 2015 and a TE Report was circulated in February 2016. It was then agreed that a "Follow-up of the Terminal Evaluation", should be planned to update the TE report produced at that time, to permit the integration and updating of relevant information regarding Project's performance. On that basis, the Project was further extended until June 2017 and a Desk Review of Project's achievement has been eventually carried out in December 2017, which is reflected in the current report.

112. As already pointed out in the TE Report (February 2016), the Project, despite the highly unfavourable context, has satisfactorily delivered relevant Outputs relatively to the preparation of the legal and administrative framework (Draft Biosafety Law and Executive Directive Regulation, draft Technical Guidelines for Risk Assessment and Management, technical manuals and outreach material, among others), the improvement of GMOs detection capacity by the upgrading of three selected reference laboratories and the capacity building of national stakeholders through training and awareness activities (see chapter 5.4.1). Project activities and Outputs delivery have remarkably increased in the last two years (2016-2017), as confirmed by the increase of the budget expenditure rate that augmented from 34% (2015) to 62% (2017).

113. The motivation and resilience of the Project Team and of the National Stakeholders have been strong driving forces for setting the Biosafety agenda in the country and for implementing it at the best of their capacities, considering the extraordinarily complex socio-political environment of Egypt from 2010 to 2014. As mentioned above, the approval of the Biosafety Law and of the Regulations is still pending, but the stabilisation of the political context makes it likely to be attained in the short-term, according to the Project Team.

114. As discussed in chapter 5.4.2 (Outcomes achievement), the Project has, during the last two years, prepared relevant documents for the strategic planning of Biosafety, namely the National Strategic Action Plan (2017-2022) and the Communication, Education and Public Awareness Plan. These documents provide the general "road-map" to identify Biosafety priorities and to define a strategy for resource mobilisation in the short-medium term.

115. Particular attention has been devoted to the capacity building of key-institutions, namely the Ministry of Environment/Egyptian Environmental Affairs Agency (MoE/EEAA) and the three reference laboratories, which are anchored to different Institutions (Ministry of Health, University/Faculty of Agriculture and the City of Scientific Research and Technological Applications of Alexandria). The improved stability of the political situation has also been profitably used by the Project to enhance the coordination with the nine line-ministries that will be involved in Biosafety Management, once the Law is approved.

116. It can, therefore, be concluded that substantive steps have been given for the setting of the four components of the National Biosafety Framework (visualised in Diagram 1 of the TOC). They need, however, to be completed and consolidated, which will only be possible within a clear and



enforceable regulatory regime formally defining roles, responsibilities, management mechanisms and procedures.

117. As discussed in chapter 5.4.2, the decision-making mechanism and the overall governance system, which are crucial steps for the full operationalisation of the Framework, still have to be set and prove effective under the foreseeable challenges of future GMOs applications in Egypt for different purposes. Capacity building programmes, manuals and guidelines produced so far will have to be updated and upgraded in accordance with emerging priority and needs, as well as with next COP-MOP decisions and new technologies. Particular emphasis has to be done to the capacity building of the Judiciary system.

118. As a whole, the Follow-up of the Terminal Evaluation has registered a significant improvement of Project Effectiveness and of its Socio-political and Institutional Sustainability, comparably with two years ago. This is reflected in the following Rating Table (Table 10) that shows an increase of the score in virtually all the evaluation criteria and in the overall Project rating.

### 6.1.1 Evaluation Criteria and Rating Table

119. The following Table provides the summarized rating of the different criteria established by UN Environment Evaluation Office (EO) that have been assessed all along the Report.

**Table 10: Evaluation Criteria and Ratings Table**

Criterion	Summary Assessment	Evaluator's Rating	Evaluation Office (EO) Ratings and comments
<b>A. Strategic Relevance</b>	Very satisfactory in all aspects.	<b>HS</b>	EO concurs
<b>B. Quality of Project Design</b>	Project Design Quality assessed in Inception Report and found weakly developed in some relevant aspects, like Project Preparation, Intended Results and Causality, Logical Framework and Monitoring.	<b>MU</b>	EO concurs
<b>C. Nature of External Context</b>	The political events of the "Arab spring", created an extraordinary socio-political situation for years triggering extremely unworkable institutional frameworks. A significant normalisation of the political situation was registered from 2015 on.	<b>Moderately Unfavourable</b>	EO concurs
<b>D. Effectiveness<sup>16</sup></b>		<b>S</b>	EO concurs only on the premise that the project operated under difficult contextual circumstances
<i>1. Delivery of outputs</i>	Main Expected Outputs delivered, despite limiting external conditions that hampered Project's performance.	<b>S</b>	<b>MS</b> – •The delivery of the most important outputs to achieve outcomes was delayed, for various reasons described in the report, thus impacting on their utility in producing

<sup>16</sup> Where a project is rated, through the assessment of Project Design Quality template during the evaluation inception stage, as facing either an Unfavourable or Highly Unfavourable external operating context, the overall rating for Effectiveness may be increased at the discretion of the Evaluation Consultant and Evaluation Manager together.

Criterion	Summary Assessment	Evaluator's Rating	Evaluation Office (EO) Ratings and comments
			expected outcomes
2. Achievement of direct outcomes	Most Immediate Outcomes satisfactorily achieved, but in need of completion and consolidation. Main Outcome to be fully achieved.	<b>MS</b>	EO concurs
3. Likelihood of impact	Steps given towards Impact but still too early to indicate a steady progress towards Impact.	<b>L</b>	<b>ML</b> – A key assumption only partially holds - without the enactment of the Biosafety Law and its regulations, the realisation of the main Outcome (a fully operational NBF) will be significantly impacted, and prohibit progression towards the intended Impact
<b>E. Financial Management</b>		<b>HS</b>	EO concurs
<b>F. Efficiency</b>	Forms of adaptive management have been considered Cost-Effective. However, taking into account the protracted duration, Time-Efficiency was highly challenged.	<b>S</b>	<b>MU</b> –project has been significantly extended (80 months) against the formally approved results framework. All things considered, the over protracted duration ought not be considered satisfactory
<b>G. Monitoring and Reporting</b>		<b>MS</b>	EO concurs
1. Monitoring design and budgeting	The Logframe and the M&E Plan were found weak and uncoherent to one another. No budget provision for Monitoring and Evaluation.	<b>MU</b>	EO concurs
2. Monitoring of project implementation	Monitoring of activities was carried out by the TM, the Steering Committee and the Project Coordinator, but a comprehensive and structured Monitoring System of Results was not effectively put in place.	<b>MS</b>	EO concurs
3. Project reporting	GEF/UN Environment tools for Monitoring Progress Reports have been implemented, transmitted and filed.	<b>S</b>	EO concurs
<b>H. Sustainability</b>		<b>ML</b>	EO concurs
1. Socio-political sustainability	Highly depending on external factors and on the national capacity of accommodating and negotiating different, somewhat diverging, agendas	<b>ML</b>	EO concurs
2. Financial sustainability	Substantive steps have been given to mainstream Biosafety within the national strategic planning and funding.	<b>ML</b>	EO concurs
3. Institutional sustainability	Likely to happen, given the coordinating mechanisms established with the support of the Project between the main line-ministries.	<b>L</b>	<b>ML</b> - A key assumption identified in the TOC (i.e. the approval of the Biosafety Law) is critical to institutionalising and operationalising the NBF
<b>I. Factors Affecting Performance</b>			
1. Preparation and readiness	Despite some relevant weaknesses in the Project Design, the Project built coherently upon the previous Project "Development of the Nat. Biosafety	<b>MS</b>	EO concurs

Criterion	Summary Assessment	Evaluator's Rating	Evaluation Office (EO) Ratings and comments
	Framework".		
2. Quality of project management and supervision	Procedures of management were up to the standards, despite the delicate socio-political phase. Relevant role of UNEP in warranting continuity.	<b>S</b>	EO concurs
3. Stakeholders participation and cooperation	Pivotal role of the Ministry of Environment and improved participation and coordination in recent years.	<b>HS</b>	EO concurs
4. Responsiveness to human rights and gender equity	Not explicitly implemented, not referred to in any Project document / report produced by the Project. Some disaggregated data by gender on participants in project's activities (e.g. training)	<b>MS</b>	EO concurs
5. Country ownership and driven-ness	Demonstrated by the involvement of national stakeholders in drafting and discussing the regulatory regime and guidelines.	<b>S</b>	EO concurs
6. Communication and public awareness	Still to be clearly set-up and consolidated	<b>S</b>	EO concurs
<b>Overall project rating</b>		<b>S</b>	<b>S</b> (overall rating has been based on a weighted scoring system used by the Evaluation Office)

## 6.2 Lessons Learned

**Lesson 1:** The Project has been implemented under exceptional socio-political circumstances and its binding timeframe has been highly challenged (80 months of extension). Recurrent extensions are usually regarded as an indicator of weak project efficiency and effectiveness. However, the Project Team considered the extensions as a wiser and more adaptive management solution than the adoption of an extraordinary mitigation measure (e.g. Project Suspension by "force majeure", as implied by the Terminal Evaluation Report of February 2016).

In retrospect, the choice of the Project's Team has proved effective, because, on the one hand, it has maintained an open channel of communication and a platform of coordination between national stakeholders (in absence of a clear institutional framework due to the exceptional socio-political situation) and, on the other hand, it has avoided supplementary administrative and procedural steps (for the suspension and the re-opening of the Project).

## 6.3 Recommendations

**Recommendation 1:** to MoE / EEAA (Min. of Environment / Egyptian Environmental Affairs Agency) and to UN Environment (regarding the full operationalisation of the National Biosafety Framework)

### **Recommendation 1:**

The Evaluation recommends the implementation of the measures foreseen in the National Strategic Action Plan for Biosafety 2017-2022 and in the National Biodiversity Strategy and Action Plan / NBSAP (regarding Biosafety), through two main instruments:

- c) A comprehensive short-medium term Capacity Building Plan (2-3 years) addressing the priority areas identified in the two documents above, with emphasis on:

- Finalization of all pending issues related to the Law, Executive Regulations and Guidelines, particularly targeting the Judiciary system;
  - Risk Assessment and Risk Management including Risk Communication;
  - Socio-economic considerations in Risk Assessment;
  - Improvement of the detection and inspection system;
  - Improvement of the National Biosafety Clearing-House;
  - Entry-points for Public Participation.
- d) The setting of a resources mobilization strategy at National and International level (e.g. NBSAP, GEF/UN Environment, NEPAD, Bilateral Cooperation) for the areas outlined above.

## **Annexes**

1. Response to stakeholder comments received but not (fully) accepted by the evaluators
2. Evaluation ToR (without annexes)
3. List of people met
4. Summary co-finance information and a statement of project expenditure by activity
5. Evaluation Brief
7. List of documents consulted
8. Brief CV of the consultant
9. Quality assessment of the evaluation report

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

<b>Stakeholder comments</b>	<b>Evaluator response</b>
<b>From National Project Coordinator (Prof. M. Fouda)</b>	
<b>Chapter 5.2 (Quality of Project Design)</b>	
<p><i>As stated in the document, Egypt was among the first countries for piloting the GEF-funded “Biosafety Enabling Activity” in 1999. At the time of project formulation, the definition of the output, was not requested, and some crucial risks were identified, etc (para 55 page 14), hence the project design was rated in 2015 as Moderately Unsatisfactory (MU). How can you explain the considerable efforts made based on the implementation of TOC. The implementing team has nothing to do with the project design which was formulated more than 15 years. We did the best to accomplish what we were asked to do; therefore, we appreciate very much changing evaluation of the final products Moderately Unlikely (MU) rate to be Moderately Satisfactory (MS).</i></p>	<p>The Terminal Evaluation is requested to assess the Project from its Formulation (Preparation and Design) up to its End. The Project Design is assessed as it was originally formulated (Project Document). This assessment is reported in Chapter 5.2 and the Project Design was rated Moderately Unsatisfactory (MU) (for the reasons explained in Chapter 5.2).</p> <p><u>It is clear therefore that the MU rating has to be attributed to the Project Designers, not to the Project Team that implemented the Project.</u></p> <p>The considerable efforts of the Project Team in the Project Implementation are fully recognised in the Report and, as rightly pointed out by the NPC in his comments, “the implementing team has nothing to do with the project design which was formulated more than 15 years before”.</p>
<b>Chapter 5.3 (Nature of the external context )</b>	
<p><i>Nature of external context. It was stated that the project has been extremely challenged with the political events of the “Arab Spring”, which created an extraordinary socio-political situation for years after the evaluation made in 2015, this is not the case now. We have now new constitution which calls for sustainable development, and conservation of natural resources. The Egyptian Parliament is currently in the final stage of approving the institutional reform, where Nature Conservation Sector will be a spate entity from EEAA, and the New Nature Conservation Agency will be responsible for its financial sustainability through new partnerships with civil society and other relevant stakeholders. This will be followed by the Biosafety Law. Therefore, we request rating to be changed from highly unfavorable (HU) to Favorable (F).</i></p>	<p>The assessment of the external context refers to those factors (e.g. climatic events, security conditions, political context, etc.) that may have hindered Project implementation, <u>along the whole lifespan of the Project.</u> While it is true that the political events of the “Arab spring” have represented for years a Highly Unfavourable context for the Project (as discussed in chapter 3.5), the Evaluator would agree that the situation has significantly changed in the last two-three years. <u>The overall rating has therefore been increased from Highly to Moderately Unfavourable.</u></p> <p>(it has to be noticed that this criterion does not contribute to the overall score of the Project)</p>
<b>Chapter 5.4.3 (Likelihood of Impact)</b>	
<p><i>In para 82 and Para 86, it was stated that there are encouraging signs, pointing out the country is giving significant Impact, which is enhancing conservation and sustainable use of biological diversity in Egypt. Based on that, Egypt has made significant efforts and succeeded in hosting CBD COP14, MOP 9 on Biosafety and MOP3 on ABS in November this year. Egypt is pioneered in many aspects of biodiversity conservation (e.g. marine program, alien invasive species, Protected Areas, etc. In addition, when we presented our work on Biosafety project in Swaziland in July 2017, we were requested to have the</i></p>	<p>The Likelihood of Impact has been reviewed and the rating has been <u>upgraded to Likely (L).</u></p> <p>(as a result, the overall score for Effectiveness has improved to Satisfactory).</p>

<p><i>next 23rd NCP in Egypt which will be held in April 2018 in Sharm El-Sheikh. Egypt will also host African Summit on Biodiversity, Biosafety and ABS, to prepare African positions on relevant issues related to Africa to COP14. The same will be for Arab countries when the next Arab Ministers of Environment will meet very soon to discuss the arrangements for preparation of CBD COP14 and its MOPs in Sharm El-Sheikh, November 2018. CBD secretariat visited Egypt 3 times, and very pleased with progress made for COP14. Therefore, we request changing rating of this item from Moderately Likely (ML) to Highly Likely (HL).</i></p>	
<p><b>Chapter 5.8 (Sustainability)</b></p>	
<p><i>Sustainability was rated as Moderately Likely (ML). We feel this is not fair, as considerable progress was made during the last 3 years; socio-political situation is stable and very safe, where many national projects were implemented. Financial and institutional have improved significantly. For example, Government of Egypt has allocated more than 10 million US \$ to host COP14 and its MOPs, in Sharm El-Sheikh, November 2018, and we have a very active national committee chaired by former Executive Secretary of CBD, to prepare all technical, logistic, communication, etc for COP14. The institutional reform is happening now, and the new legislation of a separate agency for Nature Conservation is in the final stage and will be adopted very soon by the Egyptian Parliament. Therefore, rating should be changed to Satisfactory (S) or at least Moderately Satisfactory (MS).</i></p>	<p>Sustainability is rated through a six-points scale from Highly Unlikely (HU) to Highly Likely (HL).  <u>The score ML (Moderately Likely) corresponds to the MS (Mod. Satisfactory) of the other criteria.</u>  ML is retained.</p>
<p><b>Chapter 6.1.1 (Table10, Criterion I4: Factors Affecting Performance / Responsiveness to human rights and gender equity.</b></p>	
<p><i>It is true that we did not report on this issue but it goes without saying as I strongly believe on this issue, and we have implemented it very successfully, after the new constitution in 2014. Human right is a must, demonstrated by many workshops and relevant stakeholders who are the key pressure group to achieve institutional reform in Egypt. Regarding the gender equity, it is enough to say that I have two female full-time assistants that are in charge of all administrative, financial, and technical matters, and are responsible for the significant progress made. 7 females out of 13 persons joined me to Austria (not only training but also to be familiar with recent trends of GMOs). In addition, I have to be sure that all workshops we held, the gender equity was evident where sex ratio was almost 1:1. As a matter of fact, females have proven, in this project, and demonstrated objectively that they are more valuable than males, in many cases. Therefore, rating should change from moderately unlikely (MU) to Satisfactory (S) or at least Moderately Satisfactory (MS).</i></p>	<p><u>The rating has been upgraded to Moderately Satisfactory (MS)</u></p>





## ANNEX 2: TERMS OF REFERENCE FOR THE EVALUATION

### TERMS OF REFERENCE

**Follow up to finalise the Terminal Evaluation of the UN Environment/Global Environment Facility project: “Support for Implementation of the National Biosafety Framework for Egypt”**

#### **Section 1: PROJECT BACKGROUND AND OVERVIEW**

##### **Project General Information**

**Table 1. Project summary**

<b>GEF project ID:</b>	2824	<b>IMIS number:</b>	GFL/2328-2716-4954
<b>UNEP Focal Area(s):</b>	Environmental governance	<b>Project Type:</b>	MSP
<b>GEF Strategic Priority/Objective:</b>	OP: Biodiversity 5 (project prior to 2007)	<b>GEF approval date:</b>	
<b>UNEP approval date:</b>	April 2005	<b>First Disbursement:</b>	July 2007
<b>Actual start date:</b>	October 2006	<b>Planned duration:</b>	48 months
<b>Planned completion date:</b>	September 2010	<b>Expected completion date:</b>	June 2017
<b>Planned project budget at approval:</b>	2,297,100 USD	<b>Total expenditures reported as of [latest data]:</b>	
<b>GEF Allocation:</b>	908,100 USD	<b>GEF grant expenditures reported as of [latest data]:</b>	
<b>Expected MSP/FSP Co-financing:</b>	1,389,000 USD	<b>Secured MSP co-financing</b>	1,399,492 USD
<b>Leveraged extra financing:</b>		<b>No. of Audits (last Audit reported)</b>	8 (last: 2013, rep. 10/2014)
<b>Mid-term review/eval. (planned date):</b>	N/A	<b>Mid-term review/eval. (actual date):</b>	October 2009
<b>No. of budget revisions:</b>	13	<b>Date of last Revision:</b>	01/01/2015
<b>Date of last Steering Committee meeting</b>	15th of February 2015	<b>Terminal Evaluation (actual date):</b>	Initial: February 2016 Follow-up: June 2017
<b>Date of financial closure:</b>	Not yet closed		

#### **Project rationale**

**Egypt** - Egypt hosts one of the oldest agricultural communities in the world and is among the centres of origin/diversity for important crop plants. In its quest for increasing food production, overcoming significant constraints of agricultural productivity and releasing pressure on natural ecosystems, the country embarked on the development and application of relevant biotechnologies as well as acquisition of biotechnologies and biotechnology products developed elsewhere. Egypt subsequently ratified the Cartagena Protocol on Biosafety in December 2003 and was in need to develop a workable and transparent biosafety framework to comply with international standards. This project intended to support the establishment of a fully functional biosafety framework.

A terminal Evaluation of the project was undertaken between September and November 2015 and included a mission to Egypt from 08/11/2015 to 14/11/2015. The evaluation team consisted of one consultant specialist working under

the methodological guidance of the Evaluation Office of UN Environment (EOU). The uprising of the “Arab Spring” created an extraordinary socio-political situation for years, which, in turn, triggered extremely unworkable institutional frameworks. The complex socio-political situation of the country, following the insurgence of the Arab spring in 2010 brought about considerable delays and obstacles to the implementation of the Project. Not less than six extensions (and 14 budget revisions) were approved, resulting in a shift in the official completion date to June 2017. The evaluation therefore concluded in its recommendations, that an additional no-cost extension of six (6) months from the date of the evaluation be effected in order to accommodate the technical completion of the on-going and short-term planned activities. Another terminal evaluation was also recommended to assess the achievements obtained at the end of this 6-month extension; this task would comprise of an updating of the terminal evaluation report that was previously developed.

The revision will integrate updated information to June 2017 as relevant, particularly looking at the sections regarding ‘Conclusions’, ‘Recommendations’ and ‘Overall Scoring of the Project’. The ‘Executive Summary’ will also be revised accordingly. A short explanatory note on this supplementary revision (max. 1 page) will be also prepared and included in the report as a Preamble to the Report that places the findings in their correct perspective.

### Project objectives and components

The project objective was that by 2009 (now 2017) Egypt would have a workable and transparent national biosafety framework, in line with its national development priorities and international obligations. The project comprises 4 outcomes as shown in Table 2 below:

**Table 2. Project components and expected outcomes**

Project outcome	Outputs
Egypt has a fully functional and responsive regulatory regime in line with Cartagena Protocol (CP) and national needs	<ul style="list-style-type: none"> <li>Survey of the status of relevant existing laws and regulations, research and trials and release of LMOs and products thereof in Egypt carried out;</li> <li>Legal translation of the Biosafety Law into English carried out;</li> <li>One four-day workshop organised for 24 technical, administrative and legal experts to examine the Biosafety Law and provide draft Executive Directive Regulations based on an outline of options;</li> <li>One four-day consultative workshop carried out for 25 government stakeholders (representatives of the nine ministries involved in biosafety, legal experts) to discuss the first draft Executive Directive Regulations of the Biosafety Law and the revision of the existing ministerial decrees;</li> <li>One four-day workshop organised for 25 legal, technical and trade specialists, legislators, managers and administrators to discuss, advise and provide inputs to the second draft Executive Directive Regulations and its administrative structure;</li> <li>Finalisation of the Executive Directive Regulations and its administrative structure and the revision to the existing ministerial decrees relating to biosafety for presentation to Prime Minister for approval and translation into English;</li> <li>Four-day training workshop carried out for 24 legal officers/experts on the application and implementation of the biosafety law and the executive directive regulations;</li> <li>Analysis on the legal steps to be taken to regulate the interaction of the Biosafety Law with the contained use and confined release of potentially hazardous genetically modified related organisms is carried out and steps for legal actions indicated.</li> </ul>
Egypt has a functional national system for handling request for permits for LMOs	<ul style="list-style-type: none"> <li>A five-day technical workshop for 8 specialists carried out to draft and finalise implementation procedures for risk assessment and risk management for LMOs organised; technical guidelines on methodologies for RA/RM protocols drafted and published; an internal “Manual on procedures for handling requests of LMOs in Egypt prepared;</li> <li>Two five-day training courses organised for 30 participants/course (members of the NBC, Ministries, including representatives of civil society and private sector) on handling requests for permits, including RA/RM;</li> <li>Two five-day training courses organised for 30 administrative officers/course from the biosafety office and relevant Ministries, on the administrative processing related to the handling of requests (including administrative aspects related to monitoring and inspections, a training manual is published)</li> </ul>
Egypt has a functional national system for “follow-up”, namely monitoring of environmental effects and inspections	<ul style="list-style-type: none"> <li>Manual on procedures/ methodologies for monitoring of environmental effects and inspections prepared finalised and published;</li> <li>Survey of existing facilities at universities and research centres for designation of operational reference laboratories carried out; Criteria/procedure for the selection and certification of two reference laboratories established; additional equipment purchased</li> </ul>

	<p>for the laboratories certified for LMOs detection, including post-release monitoring and enforcement, a training guide for LMOs detection in laboratories, including sampling and analysis drafted finalised and published;</p> <ul style="list-style-type: none"> <li>• Two senior scientist trained for 10 days at a well established laboratory in procedures for analysis and detection;</li> <li>• Two training programs (2 weeks each) for 10 selected staff of the two reference laboratories in LMO detection carried out;</li> <li>• A five-day training course organised for 40 custom officials and inspectors on LMOs investigation and inspection techniques; a guide for legal personnel on enforcement, settlement of disputes and handling of court cases is produced;</li> <li>• Two - day training workshops for 8 selected judges held.</li> </ul>
Egypt has a functional national system for public awareness, education, participation and access to information	<ul style="list-style-type: none"> <li>• Public education and involvement plan prepared and approved;</li> <li>• Materials on biosafety prepared and disseminated;</li> <li>• The biosafety committee web site set up and data entry protocols formulated and operational;</li> <li>• Two two-day information workshops organised for 40 local administrators on public awareness education and involvement in biosafety;</li> <li>• Two one-day workshops organised for 35 participants, including parliamentarians, media and NGO representatives on the Legislation and its implementing Directives.</li> </ul>

## Executing Arrangements

The GEF **Implementing Agency** for the project is the UN Environment acting as intermediary between the GEF and the executing agency in Egypt. In this capacity, UN Environment has overall responsibility for the implementation of the project, project oversight, technical support and co-ordination with other GEF projects.

The National **Executing Agency** (NEA) is the Ministry of Environment (MoE), through its Egyptian Environmental Affairs Agency (EEAA). According to its ToR (Annex 1.e to the ProDoc), the NEA has established the **National Coordinating Committee** (NCC) of the project with the main responsibility to oversee and review the implementation and achievement of the expected results, to provide overall policy advice, to mobilize national support and ensure national ownership, and to approve work plans and budgets. A **Project Steering Committee** was also formed. The NEA has also appointed the **National Project Coordinator** (NPC) that, with the support of a Project Assistant and a Finance & Administration Assistant, has been responsible for the coordination and supervision of all the activities of the Project, such as the preparation of work plans and budgets, communication with authorities and stakeholders, organization and supervision of the external technical assistance, monitoring and reporting to UNEP. Progress in implementation were monitored against the work plan, the half yearly project progress reports and quarterly expenditure reports.

## Project Cost and Financing

The Project had an estimated cost of USD 2.297.100, the 40% of which was represented by the GEF allocation (USD 908.100), while the remaining 60% (USD 1.389.000) was to be provided by the Government of Egypt, in kind. No other sources of funding were foreseen. Summary in table 3 below.

**Table 3. Planned project cost and co-financing**

### Project Costs (USD)

Component/sub-component	Estimated cost at design	Actual Cost	Expenditure ratio (actual/planned)
Regulatory regime	98.600	37.437	
Handling requests for authorizations	117.100	25.935	
Follow-up mechanisms	391.100	63.312	
Public awareness & participation	69.300	46.807	
Project management	162.000	68.841	
<b>Sub Total</b>	<b>838.100</b>	<b>242.332</b>	<b>29%</b>
UNEP technical Support	70.000	na	
<b>Total</b>	<b>908.100</b>		

### Co-financing (at 30/09/2015)

Co financing (Type/Source)	IA own Financing		Government		Other		Total		Total Disbursed
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	

– In-kind support			1.389.000	1.399.000			1.389.000	1.399.000	1.399.000
<b>Totals</b>			<b>1.389.000</b>	<b>1.399.000</b>			<b>1.389.000</b>	<b>1.399.000</b>	<b>1.399.000</b>

## Implementation Issues

After signing the Cartagena Protocol on Biosafety (CPB) in 2000, Egypt ratified it and a national Committee representing the main Ministries and other relevant institutions was put in place and a new draft Law was prepared by early 2004. The Project was conceived in those years to convey UNEP/GEF support to complete and implement a comprehensive National Biosafety Framework (NBF) that would include the regulatory, administrative and enforcement systems, hence making fully operational the Law that was in its final steps for approval. According to the ProDoc, the draft Biosafety law was “due to be approved by the People’s Assembly during the development of the Project”.

The Project, initially planned for a duration of four years (2006-2010), has however suffered from several delays and challenges over the course of its implementation. An initial delay of eight (8) months, between the Expected Start Date (October 2006) and the Actual Start Date (July 2007) occurred due to procedural impediments for the transfer of funds and the nomination of the NPC.

In October 2009 a Mid-term Review found that the Project was not keeping pace with the targets and as a management response, the Review undertook a risk analysis concluding that the risk of not achieving the expected Outputs within the established timeframe was “High”. The recommendation turned to be absolutely unviable due to the political events.

Following the insurgence of the “Arab spring” in 2010, further delays in the implementation of the Project were experienced. The political and institutional crisis from 2010 to 2013, culminated with the establishment of a new Government in 2014, which inevitably affected the smooth implementation of the Project. In those years, the Project pursued, to a certain extent, some activities (e.g. preparation of the Regulations of the Law and Technical Guidelines, and some training); nevertheless the sharp fall of activities is notable.

Based on the findings of the terminal evaluation that was previously undertaken (report dated February 2016, authored by Camillo Risoli), the approval and promulgation of the Law was still pending, and the draft Executive Directive Regulation and technical guidelines, though prepared, also remained ineffective. Project Outputs have been delivered in a much-extended timeframe. As a result, not only the Biosafety Regulatory Regime, but also the subsequent Administrative Systems, were yet in place. Therefore, notwithstanding the highly challenging context, it was uncontroversial that the main Project Outcome (i.e. a workable and transparent National Biosafety Framework (NBF) for Egypt), had not become operational.

## Section 2. OBJECTIVE AND SCOPE OF THE EVALUATION

### Objective of the Evaluation

A terminal evaluation of the project had previously been undertaken in the period between September and November 2015, and included a mission to Egypt from 08/11/2015 to 14/11/2015 (refer to Annex 1). The consultant evaluator recommended a no-cost extension of six (6) months from the date of the evaluation, to allow for the technical completion of the Project, to be urgently and definitely agreed upon between NPC, UNEP Task Manager and the Executing Agency (MoE), and speedily implemented by the project. Such an extension was also deemed necessary for the adequate transfer of responsibility from the project to the MoE by the end of the period of extension.

The objective of this evaluation, therefore, is: to finalise the terminal evaluation report that was completed in February 2016, by providing an update of evaluation findings based on verifiable evidence, revisiting the performance ratings of the various evaluation criteria presented in the report, and revising the recommendations as appropriate.

### Key Evaluation principles

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

**The “Why?” Question.** As this is a terminal evaluation and a follow-up project is likely [or similar interventions are envisaged for the future], particular attention should be given to learning from the experience. Therefore, the “Why?” question should be at the front of the consultant’s mind all through the exercise and is supported by the use of a theory of change approach. This means that the consultant needs to go beyond the assessment of “*what*” the project performance was, and make a serious effort to provide a deeper understanding of “*why*” the performance was as it was. This should provide the basis for the lessons from the project.

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

**Communicating evaluation results.** A key aim of the evaluation is to encourage reflection and learning by UN Environment staff and key project stakeholders. The consultant should consider how reflection and learning can be promoted, both through the evaluation process and in the communication of evaluation findings and key lessons. Clear and concise writing is required on all evaluation deliverables. The Evaluation Manager will plan with the consultant which audiences to target and the easiest and clearest way to communicate the key evaluation findings and lessons to them.

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

This exercise will comprise of a desk based assessment of the project in a bid to determine what additional activities, outputs and outcomes have been achieved since the previous evaluation was undertaken in 2015, and update the terminal evaluation report accordingly. There will be no additional field missions required for this exercise. It is highly recommended that the consultant maintains close communication with the project team and promotes information exchange in order to increase their (and other stakeholder) ownership of the evaluation findings.

The consultant will prepare and submit the following deliverable:

- **Draft and Final Evaluation Report Update:** containing an executive summary that can act as a standalone document; detailed analysis of the evaluation findings organised by evaluation criteria and supported with evidence; lessons learned and recommendations and an annotated ratings table.

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

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

The Evaluation Manager will prepare a **quality assessment** of the main evaluation report, which acts as a tool for providing structured feedback to the evaluation consultant. The quality of the report will be assessed and rated against the criteria specified in the template listed in Annex 3.

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

## The Consultant

For this evaluation, one consultant will work under the overall responsibility of the Evaluation Office represented by an Evaluation Manager (Pauline Marima) and in consultation with the UN Environment Task Manager (Alex Owusu-Biney). The consultant will liaise with the Evaluation Manager on any procedural and methodological matters related to the evaluation.

The consultant will be hired over the period May/2017 to June/2017 during which time the evaluation deliverables listed in Section 3 above should be submitted. S/he should have: an advanced university degree in sciences, evaluation experience preferably using a Theory of Change approach, at least 15 years' experience in environmental management or a related field, with a preference for specific expertise in the area of biosafety and biodiversity is required. Excellent writing skill in English is required.

The consultant will be responsible, in close consultation with the Evaluation Office of UN Environment, for overall management of the evaluation and timely delivery of its outputs. Detailed guidelines for the Evaluation Consultant can be found on the Evaluation Office of UN Environment website: (<http://web.unep.org/evaluation/working-us/working-us>).

## Schedule of the evaluation

The table below presents the tentative schedule for the evaluation.

**Table 4. Tentative schedule for the evaluation**

Milestone	Tentative timeline
Desk based reviews, telephone/online interviews, etc.	May – June 2017
Draft updated TE Report to Evaluation Manager (and Peer Reviewer)	June 2017
Draft updated TE Report shared with UN Environment Task Manager and project team	June 2017
Final updated TE Report	June 2017

## Contractual Arrangements

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

**Table 5. Schedule of Payment for the Consultant**

Deliverable	Percentage Payment
Approved draft of the updated TE Report	60%
Approved final version of the updated TE Report	40%

**Fees only contracts:** The consultant will be provided with access to UN Environment's ANUBIS document repository, and if such access is granted, the consultant agree not to disclose information from that system to third parties beyond information required for, and included in, the evaluation report.

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

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

### ANNEX 3: LIST OF PEOPLE MET

NAME	POSITION & INSTITUTION	E-mail
Dr. Moustafa Fouda	National Project Coordinator, MoE Advisor Project EPASP (Strengthening Protected Areas Financing and Management Systems), CBD National Focal Point	<a href="mailto:drfoudamos@gmail.com">drfoudamos@gmail.com</a> <a href="mailto:foudamos@link.net">foudamos@link.net</a>
Dr. Ossama El-Tayeb	Project Advisor, CPB and BCH National Focal Point	<a href="mailto:omtayebom@gmail.com">omtayebom@gmail.com</a>
Dr. Adel Soliman	Project Assistant, also Project Manager of GEF-UNDP Project EPASP	<a href="mailto:adelnbu@yahoo.com">adelnbu@yahoo.com</a>
Mr. Ahmed Abd elmaksoud	Project Financial & Admin Assistant, also Administrative Assistant of EPASP	<a href="mailto:abdelmaksoud76@gmail.com">abdelmaksoud76@gmail.com</a>
Eng. Ahmed Abou El-Seoud Ahmed	Chief Executive Officer Cabinet of Minister MoE	<a href="mailto:eeaa@eeaa.gov.eg">eeaa@eeaa.gov.eg</a>
Dr. Ahmed Salama	Director Dept. of Protected Areas MoE	<a href="mailto:maazaparks@hotmail.com">maazaparks@hotmail.com</a>
Mrs. Tahra El-Hefnawy	Director of Follow-up of Foreign Projects MoE	<a href="mailto:tahra_elhefnawy@hotmail.com">tahra_elhefnawy@hotmail.com</a>
Dr. Khaled Allam	Manager of Biological Resources Office, Nature Conservation Sector (NCS) , MoE	<a href="mailto:khaledallam4@hotmail.com">khaledallam4@hotmail.com</a>
Dr. El-Bialy Hatab	Manager of Technical Office (NCS), MoE	<a href="mailto:bialy.hatab@yahoo.co.uk">bialy.hatab@yahoo.co.uk</a>
Dr. Hamdy Abdel Aziz	Project Advisor	<a href="mailto:Azzahamdy239@hotmail.com">Azzahamdy239@hotmail.com</a>
Dr. Mohamed Ali Saber	Project Advisor	<a href="mailto:maasaber@yahoo.com">maasaber@yahoo.com</a>
Dr. Ahmed Safwat A. Abdelaal	Director General at Central Public Health Laboratory, Min. of Health	<a href="mailto:centralhealthlabs@yahoo.com">centralhealthlabs@yahoo.com</a>
Dr. Samira S. Nakla and technical staff of Laboratory	Manager Head of Controlling, Central Public Health Lab.	<a href="mailto:centralhealthlabs@yahoo.com">centralhealthlabs@yahoo.com</a>
Dr. Hany A. El-Shemi and Technical Staff of Laboratory	Dean of Faculty of Agriculture, Cairo University	<a href="mailto:dean@agr.cu.edu.eg">dean@agr.cu.edu.eg</a>
Mrs Hala Rahmy	Office Manager Project EPASP	<a href="mailto:hala_rahmy@hotmail.com">hala_rahmy@hotmail.com</a>
Mrs Dina Zulficar	Civil Society Organisation	<a href="mailto:dinazulficar@yahoo.com">dinazulficar@yahoo.com</a>
Mrs Samia Zeitoun	Civil Society Organisation	<a href="mailto:zeitouns@gmail.com">zeitouns@gmail.com</a>
Mrs Asmaa Halwagy	Civil Society Organisation	<a href="mailto:asmaahalwagy@yahoo.com">asmaahalwagy@yahoo.com</a>

## ANNEX 4: SUMMARY CO-FINANCE INFORMATION AND STATEMENT OF PROJECT EXPENDITURE BY ACTIVITY

### GEF Budget at design and expenditures by components (June 2017)

Component/sub-component	Estimated cost at design	Actual Cost	Expenditure ratio (actual/planned)
Regulatory regime	98.600	37,437	38%
Handling requests for authorizations	117.100	29,459	25%
Follow-up mechanisms	391.100	159,627	41%
Public awareness & participation	69.300	142,132	206%
Project management	162.000	96,679	60%
<b>Sub Total</b>	<b>838.100</b>	<b>465,334</b>	<b>56%</b>
UN Environment technical Support	70.000	94,701	135%
<b>Total</b>	<b>908.100</b>	<b>560,035</b>	<b>62%**</b>

\*\* The expenditure ratio was 34% in September 2015, at the time of the Terminal Evaluation

### Co-financing Table

Co financing (Type/Source)	IA own Financing		Government		Other		Total		Total Disbursed
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
- Grants									
- Loans									
- Credits									
- Equity investments									
- In-kind support			1.389.000	<b>1.487.442</b>			1.389.000	1.487.442	1.487.442
- Other									
<b>Totals</b>			<b>1.389.000</b>	<b>1.487.442</b>			<b>1.389.000</b>	<b>1.487.442</b>	<b>1.487.442</b>



## ANNEX 5: EVALUATION BRIEF

### Terminal Evaluation of GEF/UN Environment Project "Support for Implementation of the National Biosafety Framework for Egypt" (2007-2017)

#### Biodiversity and Biosafety in Egypt: Relevance of the Project

Egypt, home of a variety of terrestrial and aquatic ecosystems, has a unique biodiversity that contributes to its economy, supports human wellbeing and provides regulating services.



Sustainable natural resources management, genetic resources protection and equitable sharing of benefits from their use are at the core of the "Biodiversity Strategy and Action Plan of Egypt to 2030".

The country, however, has limited renewable resources of land and water for agricultural purposes and a fast-growing population (third most populous country of Africa). In this context, Egypt has become one of the most advanced developing countries in the adoption and development of agricultural biotechnology.

A fully operational Biosafety Framework is, therefore, absolutely needed to allow Egypt complying with its national and international obligations in the field of safe transfer, handling and use of living modified organisms.

#### The setting and implementation of the National Biosafety Framework (NBF) in Egypt

After signing the Cartagena Protocol on Biosafety in 2000, Egypt ratified it in 2003 and the Ministry of Environment (MoE) became the Competent National Authority (CNA) for the Protocol implementation.

The overall objective of the Project was to support the country to achieve a workable and transparent National Biosafety Framework (NBF) encompassing:

- A fully functional and responsive regulatory regime;
- An administrative system for handling applications, Risk Assessment and Risk Management;
- A follow-up system in place to monitor environmental effects and enforcement;
- A functional system for public awareness, education and participation.

Under the coordination of the MoE, a national Committee was put in place and prepared a draft Law by early 2004, which was largely discussed and revised, and eventually approved by nine line-Ministries in 2010 and sent to the Government for approval and submission to the Parliament.

The uprising of the so-called "Arab Spring" followed by the dramatic events that characterized the prolonged socio-political instability of the country from 2010 to 2014, has created an unworkable institutional environment that hampered the progress of the Biosafety Framework for years.

With the establishment of a new Government, the draft Law was eventually approved by the Cabinet of Ministers in July 2015 and is currently being revised by the cabinet's Judicial Reform Committee, prior to submission to the parliament of Egypt for endorsement, which is expected to occur in 2018.

#### Institutional context

- The Competent National Authority and National Executing Agency of the Project has been the Ministry of Environment / Egyptian Environmental Affairs Agency (MoE / EEAA), through its Nature Conservation Sector (NCS) that houses the Biodiversity Department and the Biosafety Unit.
- Nine line-Ministries (Environment, Agriculture & Land Reclamation, Health, Justice, Foreign Affairs, Finance, International Cooperation, Higher Education and Scientific Research & Technology) have been involved in the drafting and revision of the Regulatory regime and will be part of the Supreme Committee on Intentional Release of Genetically Engineered Products into the Environment (SCIRGEPE), which is the decision-making body on GMOs applications foreseen by the future Law.
- MoE / EEAA has signed MoUs with three GMOs reference laboratories upgraded in three different institutions: the Central Lab. of the Min. of Health, the

Laboratory of the Faculty of Agriculture (University of Cairo) and the Laboratory of Alexandria (in the City of Science & Technology).



## Performance

The Project, despite operating within an unfavourable socio-political context for years, has satisfactorily delivered relevant Outputs:

- Preparation of the legal and administrative framework (Draft Biosafety Law and Executive Directive Regulation, draft Technical Guidelines for Risk Assessment and Management);
- Technical manuals and outreach material;
- Capacity building through training and awareness activities;
- Upgrading of three selected GMOs reference laboratories;
- Preparation of the National Strategic Action Plan (2017-2022) and the Communication, Education and Public Awareness Plan. These two documents provide the general “road-map” to identify Biosafety priorities and to define a strategy for resource mobilisation in the short-medium term.



*Preparation of the National Strategic Action Plan (2017-2022)*

## ANNEX 6: LIST OF DOCUMENTS CONSULTED

### Egypt:

- Terms of Reference of the Terminal Evaluation
- Project “Support for Implementation of the National Biosafety Framework for Egypt”: (GFL/2328-2716-4954) and Annexes
- “Egypt and the GEF”, from GEF Website, 2013
- GEF website (Egypt page) [https://www.thegef.org/gef/country\\_profile/EG](https://www.thegef.org/gef/country_profile/EG)
- BCH <https://bch.cbd.int/about/countryprofile.shtml?country=eg>
- EPASP Project website [www.epasp.org](http://www.epasp.org)
- “Biosafety Egypt” Facebook page <https://www.facebook.com/pages/Biosafety-Egypt/102195149873964>
- National BCH website <http://www.egbch.com/contacts.html>
- “Protected Areas of Egypt: Towards the Future”, MoE, 2006
- “Biotechnology and Genetic Engineering in Egypt: Principal Research findings of the Science and Technology Project”, USAID, 1995
- “Analysis of a National Biosafety System: Regulatory Policies and Procedures in Egypt” ISNAR/AGERI, 2000
- “Biosafety Studies in Egypt and Argentina: Two Pathways to Implementation” in “A Framework for Biosafety Implementation”, ISNAR, 2001
- “Restrictions on Genetically Modified Organisms: Egypt”, in Library of Congress, 2014  
[http://www.loc.gov/law/help/restrictions-on-gmos/egypt.php#\\_ftn5](http://www.loc.gov/law/help/restrictions-on-gmos/egypt.php#_ftn5)
- “Egypt’s legal battle to regulate Monsanto’s GMOs” in Egypt Independent 21/07/2012  
<http://www.egyptindependent.com/news/egypt-s-legal-battle-regulate-monsanto-s-gmos-0>
- Environmental Justice Atlas “Monsanto GM crops, Egypt” <https://ejatlas.org/conflict/monsanto-gm-crops-egypt>
- <http://www.fao.org/giews/countrybrief/country.jsp?code=EGY>

### Global:

- Cartagena Protocol on Biosafety (CPB)
- Nagoya – Kuala Lumpur Supplementary Protocol on Liability and Redress to the Cartagena Protocol on Biosafety
- Bali Strategic Plan for Technology Support and Capacity- building
- Status of capacity-building activities, UNEP/CBD/BS/COP-MOP/5/INF/9, September 2010
- Environment Fund budgets: proposed biennial programme and support budget for 2008–2009, UNEP
- Proposed biennial programme and support budgets for 2010–2011, UNEP
- UNEP Medium-term Strategy 2010–2013, “Environment for Development”
- Proposed biennial programme of work and budget for 2012–2013
- Strategic plan of CPB 2011–20
- A Comparative Analysis of Experiences and Lessons from the UNEP-GEF Biosafety Projects, 2006, UNEP-GEF Biosafety Unit
- Guidance towards Implementation of National Biosafety Frameworks: Lessons Learned from the UNEP Demonstration Projects, 2008, UNEP-GEF Biosafety Unit
- Learning from experience, the global UNEP-GEF BCH Capacity building project, 2008, UNEP-GEF
- Public Participation and the Cartagena Protocol on Biosafety, A review for DfID and UNEP-GEF (IDS)
- An Explanatory Guide to the Cartagena Protocol on Biosafety, IUCN, 2003
- ROI - Review of Outcomes to Impact: Practitioners Handbook, 2009, GEF
- UNEP Programme Manual, May 2013
- “Legal Aspects of Implementing the Cartagena Protocol on Biosafety “, Cordonier Segger, Perron-Welch, C. Frison, Cambridge Univ. Press, 2013

## ANNEX 7: BRIEF CV OF THE CONSULTANT

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

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

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

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

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

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

From 2012 on, Camillo has carried-out the Biosafety National Frameworks Evaluation (UNEP-GEF) in Kenya, Namibia, Poland, Lithuania, Czech Republic and Slovakia (2012), Bhutan, Lao PDR and Mongolia (2014), Albania, Macedonia and Egypt (2015), Ghana, Liberia and Nigeria (2017) and the Final Evaluation of the Global GEF/UNEP Programme (123 countries) "Development of National Biosafety Frameworks" (2016).

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

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

## Quality Assessment of the Evaluation Report

Evaluation Title:

Terminal Evaluation of the Project “Support for Implementation of the National Biosafety Framework for Egypt”

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

	UN Environment Evaluation Office Comments	Draft Report Rating	Final Report Rating
<b>Substantive Report Quality Criteria</b>			
<b><i>Quality of the Executive Summary:</i></b> The Summary should be able to stand alone as an accurate summary of the main evaluation product. It should include a concise overview of the evaluation object; clear summary of the evaluation objectives and scope; overall evaluation rating of the project and key features of performance (strengths and weaknesses) against exceptional criteria (plus reference to where the evaluation ratings table can be found within the report); summary of the main findings of the exercise, including a synthesis of main conclusions (which include a summary response to key strategic evaluation questions), lessons learned and recommendations.	<b>Draft report:</b> <i>(Exec Summaries are not always provided at draft stage)</i>  <b>Final report:</b> Executive covers the most pertinent issues/highlights of the evaluation findings	Not Rated	5
<b><i>I. Introduction</i></b> A brief introduction should be given identifying, where possible and relevant, the following: institutional context of the project (sub-programme, Division, regions/countries where implemented) and coverage of the evaluation; date of PRC approval and project document signature); results frameworks to which it contributes (e.g. Expected Accomplishment in POW); project duration and start/end dates; number of project phases (where appropriate); implementing partners; total secured budget and whether the project has been evaluated in the past (e.g. mid-term, part of a synthesis evaluation, evaluated by another agency etc.) Consider the extent to which the introduction includes a concise statement of the purpose of the evaluation and the key intended audience for the findings?	<b>Draft report:</b> Precise, well written and captures the main introductory points  <b>Final report:</b> Same as draft	5	5
<b><i>II. Evaluation Methods</i></b> This section should include a description of how the <i>TOC at Evaluation</i> <sup>17</sup> was designed (who was involved etc.) and applied to the context of the project? A data collection section should include: a description of evaluation methods and information sources used, including the number and type of respondents; justification for methods used (e.g. qualitative/quantitative; electronic/face-to-face); any selection criteria used to identify respondents, case studies or sites/countries visited; strategies used to increase stakeholder engagement and consultation; details of how data were verified (e.g. triangulation, review by stakeholders etc.).	<b>Draft report:</b> This section is complete, concise, and it covers the required sub-topics satisfactorily  <b>Final report:</b> Same as draft	6	6

<sup>17</sup> During the Inception Phase of the evaluation process a *TOC at Design* is created based on the information contained in the approved project documents (these may include either logical framework or a TOC or narrative descriptions). During the evaluation process this TOC is revised based on changes made during project intervention and becomes the *TOC at Evaluation*.



	UN Environment Evaluation Office Comments	Draft Report Rating	Final Report Rating
<p>The methods used to analyse data (e.g. scoring; coding; thematic analysis etc.) should be described.</p> <p>It should also address evaluation limitations such as: low or imbalanced response rates across different groups; extent to which findings can be either generalised to wider evaluation questions or constraints on aggregation/disaggregation; any potential or apparent biases; language barriers and ways they were overcome.</p> <p>Ethics and human rights issues should be highlighted including: how anonymity and confidentiality were protected and strategies used to include the views of marginalised or potentially disadvantaged groups and/or divergent views.</p>			
<p><b>III. The Project</b></p> <p>This section should include:</p> <ul style="list-style-type: none"> <li>• <i>Context</i>: Overview of the main issue that the project is trying to address, its root causes and consequences on the environment and human well-being (i.e. synopsis of the problem and situational analyses).</li> <li>• <i>Objectives and components</i>: Summary of the project's results hierarchy as stated in the ProDoc (or as officially revised)</li> <li>• <i>Stakeholders</i>: Description of groups of targeted stakeholders organised according to relevant common characteristics</li> <li>• <i>Project implementation structure and partners</i>: A description of the implementation structure with diagram and a list of key project partners</li> <li>• <i>Changes in design during implementation</i>: Any key events that affected the project's scope or parameters should be described in brief in chronological order</li> <li>• <i>Project financing</i>: Completed tables of: (a) budget at design and expenditure by components (b) planned and actual sources of funding/co-financing</li> </ul>	<p><b>Draft report:</b> This section is also complete and covers all the required sub-topics in a concise and clear manner.</p> <p><b>Final report:</b> Same as draft</p>	6	6
<p><b>IV. Theory of Change</b></p> <p>A summary of the project's results hierarchy should be presented for: a) the results as stated in the approved/revised Prodoc logframe/TOC and b) as formulated in the TOC at Evaluation. <i>The two results hierarchies should be presented as a two column table to show clearly that, although wording and placement may have changed, the results 'goal posts' have not been 'moved'.</i> The TOC at Evaluation should be presented clearly in both diagrammatic and narrative forms. Clear articulation of each major causal pathway is expected, (starting from outputs to long term impact), including explanations of all drivers and assumptions as well as the expected roles of key actors.</p>	<p><b>Draft report:</b> The TOC diagram is coherent. The narrative is clear and provides a suitable explanation of the causal pathways depicted in the diagrammatic representation. Drivers and Assumptions, as well as stakeholders/change agents in the pathways are described.</p> <p><b>Final report:</b> Same as draft</p>	6	6
<p><b>V. Key Findings</b></p> <p><b>A. Strategic relevance:</b></p> <p>This section should include an assessment of the project's relevance in relation to UN Environment's mandate and its alignment with UN Environment's policies and strategies at the time of project approval. An assessment of the</p>	<p><b>Draft report:</b> Section is well done and covers all the main aspects of relevance prescribed in the TOR</p> <p><b>Final report:</b></p>	6	6

	UN Environment Evaluation Office Comments	Draft Report Rating	Final Report Rating
<p>complementarity of the project with other interventions addressing the needs of the same target groups should be included. Consider the extent to which all four elements have been addressed:</p> <ol style="list-style-type: none"> <li>1. Alignment to the UN Environment Medium Term Strategy (MTS) and Programme of Work (POW)</li> <li>2. Alignment to UN Environment/GEF/Donor Strategic Priorities</li> <li>3. Relevance to Regional, Sub-regional and National Environmental Priorities</li> <li>4. Complementarity with Existing Interventions</li> </ol>	Same as draft		
<p><b>B. Quality of Project Design</b> To what extent are the strength and weaknesses of the project design effectively <u>summarized</u>?</p>	<p>Draft report: The strengths and weaknesses of the design are sufficiently described. Where relevant, references to the PDQ assessment that was completed at the inception phase have been used to further support the rating of this criterion.</p> <p>Final report: Same as draft</p>	5	5
<p><b>C. Nature of the External Context</b> For projects where this is appropriate, key external features of the project's implementing context that may have been reasonably expected to limit the project's performance (e.g. conflict, natural disaster, political upheaval) should be described.</p>	<p>Draft report: The TE sufficiently describes the key external issues that are most likely to affect the project's performance. This is also cross referenced in other sections of the report as appropriate</p> <p>Final report: Same as draft</p>	5	5
<p><b>D. Effectiveness</b> (i) <b>Outputs and Direct Outcomes:</b> How well does the report present a well-reasoned, complete and evidence-based assessment of the achievement of a) outputs, and b) direct outcomes? How convincing is the discussion of attribution and contribution, as well as the limitations to attributing effects to the intervention.</p>	<p>Draft report: Outputs are described by component, and with sufficient evidence provided to support a detailed assessment of the delivery of outputs. The chapter also presents a qualitative analysis and interpretation of the Outcomes achieved in the light of the reconstructed Theory of Change (TOC) from Outputs to Outcomes.</p> <p>Final report: Well done, as in the draft. Minor difference in opinion with the consultant over the ratings</p>	5	5
<p>(ii) <b>Likelihood of Impact:</b> How well does the report present an integrated analysis, guided by the causal pathways represented by the TOC, of all evidence relating to likelihood of impact? How well are change processes explained and the roles of key actors, as well as drivers and assumptions, explicitly discussed?</p>	<p>Draft report: The narrative provides an adequate and considered analysis of the causal pathways from outcomes to intermediate states through to impact. Cross referencing to the TOC has also</p>	5	5

	UN Environment Evaluation Office Comments	Draft Report Rating	Final Report Rating
	<p>been used.</p> <p>Final report: Well done, as in the draft. Minor difference in opinion with the consultant over the ratings</p>		
<p><b>E. Financial Management</b></p> <p>This section should contain an integrated analysis of all dimensions evaluated under financial management. And include a completed ‘financial management’ table. Consider how well the report addresses the following:</p> <ul style="list-style-type: none"> <li>• <i>completeness</i> of financial information, including the actual project costs (total and per activity) and actual co-financing used</li> <li>• <i>communication</i> between financial and project management staff and</li> <li>• <i>compliance</i> with relevant UN financial management standards and procedures.</li> </ul>	<p>Draft report: The section has been covered relatively well and a table summarizing financial management performance is included. Issues of completeness, communication and compliance are addressed</p> <p>Final report: Same as draft</p>	5	5
<p><b>F. Efficiency</b></p> <p>To what extent, and how well, does the report present a well-reasoned, complete and evidence-based assessment of efficiency under the primary categories of cost-effectiveness and timeliness including:</p> <ul style="list-style-type: none"> <li>• Implications of delays and no cost extensions</li> <li>• Time-saving measures put in place to maximise results within the secured budget and agreed project timeframe</li> <li>• Discussion of making use of/building on pre-existing institutions, agreements and partnerships, data sources, synergies and complementarities with other initiatives, programmes and projects etc.</li> <li>• The extent to which the management of the project minimised UN Environment’s environmental footprint.</li> </ul>	<p>Draft report: This section has been covered sufficiently.</p> <p>Final report: Same as draft though there are minor differences of opinion with the consultant over the rating given</p>	5	5
<p><b>G. Monitoring and Reporting</b></p> <p>How well does the report assess:</p> <ul style="list-style-type: none"> <li>• Monitoring design and budgeting (<i>including SMART indicators, resources for MTE/R etc.</i>)</li> <li>• Monitoring implementation (<i>including use of monitoring data for adaptive management</i>)</li> <li>• Project reporting (e.g. <i>PIMS and donor report</i>)</li> </ul>	<p>Draft report: This section is well covered. Assessment looks beyond reporting considers the project’s performance in results-based monitoring as well as how this has been used for adaptive management.</p> <p>Final report: Same as draft</p>	6	6
<p><b>H. Sustainability</b></p> <p>How well does the evaluation identify and assess the key conditions or factors that are likely to undermine or contribute to the persistence of achieved direct outcomes including:</p> <ul style="list-style-type: none"> <li>• Socio-political Sustainability</li> <li>• Financial Sustainability</li> <li>• Institutional Sustainability (<i>including issues of</i></li> </ul>	<p>Draft report: The assessment of sustainability does identify the most pertinent issues likely to undermine sustenance of outcomes. The analysis is satisfactory and some suggestions have been made to clarify some minor contradictions</p>	5	5



	UN Environment Evaluation Office Comments	Draft Report Rating	Final Report Rating
<i>partnerships)</i>	Final report: Same as draft though there are minor differences of opinion with the consultant over the rating given		
<b>I. Factors Affecting Performance</b> These factors are <u>not</u> discussed in stand-alone sections but are <b>integrated in criteria A-H as appropriate</b> . To what extent, and how well, does the evaluation report cover the following cross-cutting themes: <ul style="list-style-type: none"> <li>• Preparation and readiness</li> <li>• Quality of project management and supervision<sup>18</sup></li> <li>• Stakeholder participation and co-operation</li> <li>• Responsiveness to human rights and gender equity</li> <li>• Country ownership and driven-ness</li> <li>• Communication and public awareness</li> </ul>	Draft report: The required sub-criteria are all covered sufficiently. Cross referencing has been done appropriately.  Final report: Same as draft	6	6
<b>VI. Conclusions and Recommendations</b>  <b>i. Quality of the conclusions:</b> The key strategic questions should be clearly and succinctly addressed within the conclusions section? It is expected that the conclusions will highlight the main strengths and weaknesses of the project, and connect them in a compelling story line. Conclusions, as well as lessons and recommendations, should be consistent with the evidence presented in the main body of the report.	Draft report: The conclusions section is very well developed and clearly presents the most critical findings of the evaluation.  Final report: Same as draft though there are minor differences of opinion with the consultant over the rating given	5	5
<b>ii) Quality and utility of the lessons:</b> Both positive and negative lessons are expected and duplication with recommendations should be avoided. Based on explicit evaluation findings lessons should be rooted in real project experiences or derived from problems encountered and mistakes made that should be avoided in the future. Lessons must have the potential for wider application and use and should briefly describe the context from which they are derived and those contexts in which they may be useful.	Draft report: The lessons are relevant and based on findings. The context is summarized well and crossreferences have been used adequately. Some amendments are however needed to phrase the lessons in a way that they can have wider application and that are more instructive.  Final report: Improved formulation of lessons learned	5	5.5
<b>iii) Quality and utility of the recommendations:</b> To what extent are the recommendations proposals for specific actions to be taken by identified people/position-holders to resolve concrete problems affecting the project or the sustainability of its results. They should be feasible to implement within the timeframe and resources available (including local capacities) and specific in terms of who	Draft report: The recommendations are relevant and identify the action and who should implement it. Final report: Same as draft	5	5

<sup>18</sup> In some cases 'project management and supervision' will refer to the supervision and guidance provided by UN Environment to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UN Environment.

	UN Environment Evaluation Office Comments	Draft Report Rating	Final Report Rating
would do what and when. Recommendations should represent a measurable performance target in order that the Evaluation Office can monitor and assess compliance with the recommendations.			
<b><i>VII. Report Structure and Presentation Quality</i></b>			
i) <b>Structure and completeness of the report:</b> To what extent does the report follow the Evaluation Office guidelines? Are all requested Annexes included and complete?	Draft report: Well done. Follows the EO guidelines  Final report: Same as draft	6	6
ii) <b>Quality of writing and formatting:</b> Consider whether the report is well written (clear English language and grammar) with language that is adequate in quality and tone for an official document? Do visual aids, such as maps and graphs convey key information? Does the report follow Evaluation Office formatting guidelines?	Draft report: Clear, well formatted document  Final report: Same as draft	6	6
<b>OVERALL REPORT QUALITY RATING</b>		<b>S</b>	<b>S</b>

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