

## MID-TERM EVALUATION (MTR) CI GEF SCASGM-005



A GEF GOLD/Supply Chain Approach to Eliminating Mercury in Guyana's ASGM Sector: El Dorado Gold Jewelry – Made in Guyana

**“El Dorado Gold Jewelry”**



CONSERVATION INTERNATIONAL (CI)

MID TERM REVIEW

FINAL REPORT

Asesoramiento Ambiental Estratégico (AAE)

June, 2021



Asesoramiento  
Ambiental  
Estratégico

## Table of Content

Acronyms .....	4
I. Executive Summary .....	6
I.1 Project description .....	7
I.2 Summary of the project's progress .....	7
I.3 Summary concise conclusions .....	16
II. Introduction: Purpose, Scope, and Methodology.....	21
II.1 Purpose of the MTR and objectives .....	21
II.2 Scope of Evaluation.....	22
II.3 Methodology.....	24
II.4 Limitation of Methodology .....	29
III. Project Description and Background Context.....	30
III.1 Development Context .....	30
III.1.1. The Environmental Context .....	31
III.1.2. Development Context .....	32
III.1.3 Barriers to Addressing Global Environmental Problems and Root Causes.....	32
III.2 Project Strategy.....	33
III.2 Project Results Framework .....	35
III.2.3 Theory of Change .....	42
III.3 Project Geography .....	42
III.2.5 Implementation Arrangements .....	43
IV. Findings and Recommendations.....	45
IV.1 Project Justification.....	45
IV.2 Project Design and Strategy.....	47
IV.3 Progress Towards Results .....	51
IV.3.1. Overall Progress Towards Results.....	51
IV.3.2. Overall Ranking on Component 1 Delivery of Results MF Technologies in ASGM.....	57
IV.3.3. Overall Ranking on Component 2 Delivery of Results Financing Capital Investments.....	63
IV.3.4. Overall Ranking on Component 3 Delivery of Results Assessing and Growing Markets.....	65
IV.3.5. Overall Ranking on Component 4 Delivery of Results National Policies and Incentives for Mercury Free Gold. ....	70
IV.3.6. Overall Ranking on Component 5 Delivery of Results Monitoring and Evaluation.....	72

IV.3.7. Overall Ranking on Component 6 Delivery of Results Communications and Knowledge Management .....	75
V. Project Implementation and Adaptive Management .....	77
V.1. Recruitment and Staffing .....	78
<b>VI Modified Risk Assessment</b> .....	<b>81</b>
<b>VII Safeguards</b> .....	<b>92</b>
<b>VII.1. Environmental Safeguards</b> .....	<b>93</b>
VII.2 Gender .....	94
VII.3 Indigenous Affairs .....	95
VII.4 Grievance Mechanism .....	96
VII.5 Stakeholder Engagement Plan .....	96
VII Sustainability .....	97
V. Conclusions and recommendations .....	99
V.1 Conclusions .....	99
V.2 Recommendations .....	102
Annexes .....	110
Annex I. Terms of Reference .....	110
Annex II. MTR Evaluation Matrix .....	115
Annex III. Interview Guide .....	119
Annex IV. MTR Ratings .....	126
Annex V. MTR Workplan .....	127
Annex VI. List of interviewed stakeholders .....	128
Annex VII. Checklist of Documents Reviewed .....	130
Annex VIII. Co-financing Table .....	132
Annex IX: Suggested Project Results Framework .....	133
Annex X. Safeguard Screening Form .....	138
Annex XI. Summary Table of Findings, Conclusions, and Recommendations .....	144
Annex XII. UNEG Code of Conduct for Midterm Review Consultants .....	157
Annex XIII. Audit Trail .....	158

## Acronyms

ASGM	Artisanal Small- and Medium-Scale Gold Mining
AAE	Asesoramiento Ambiental Estratégico
AWP	Annual Work Plan
AGM	Accountability and Grievance Mechanism
CI	Conservation International
COVID	Coronavirus
EA	Executing Agency
EPA	Environmental Protection Agency
EOI	Expressions of Interest
EOP	End of Project
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
FY	Fiscal Year
GDP	Gross Domestic Product
GEF	Global Environmental Facility
GGB	Guyana Gold Board
GMP	Gender Mainstreaming Plan
GGDMA	Guyana Gold and Diamond Miners Association
GGMC	Guyana Geology and Mines Commission
GoG	Government of Guyana
GWMO	Guyana Women Miners Organization
IPV	Intimate Partner Violence
Hg	Mercury
MF MDF	Mercury-Free Mining Development Fund
MNR	Ministry of Natural Resources
MOU	Memorandum of Understanding
MoIPA	Ministry of Indigenous Peoples' Affairs
MTR	Medium-Term Evaluation Report
NAP	National Action Plan
NGO	Non-Governmental Organization

NORAD	Norwegian Agency for Development Cooperation
PIR	Project Implementation Report
PMU	Project Management Unit
PPG	Project Preparation Grant
PRODOC	Project Document
PSC	Project Steering Committee—El Dorado Gold Responsible Mining for Guyana Initiative
PTCCB	Pesticides and Toxic Chemicals Control Board
RBA	Rights Base Approach
RF	Results Framework
RMI	Responsible Mineral Initiative
SEP	Stakeholder Engagement Plan
TCG	Consultancy Group
TE	Terminal Evaluation
TIP	Trafficking in Persons
TOC	Theory of Change
TDY	The DragonFly Initiative
UNDRIP	United Nations Declaration of the Rights of Indigenous Peoples
VIP	Village Improvement Plan
WHO	World Health Organization

## I. Executive Summary

Project Name: A supply chain approach to eliminating mercury in Guyana's ASGM sector: El Dorado Gold Jewelry – Made in Guyana			
UNDP ID for the project (PIMS #):	----	PIF Date of approval:	
GEF ID for the project (PIMS #):	9713	CEO Endorsement date:	4/17/2018
ATLAS business unit, File No.; Project ID (Award # Project ID)	-----	Project Document Date of signing (project start date):	5/4/2018
Country	Guyana	Project director hiring date:	
Region		Initiation workshop date:	9/3/2018
Action area		Date of completion of the mid-term exam:	5/30/2021
Strategic Objective of the GEF's area of action:	Chemical and Waste	Expected completion date:	4/20/2022
Trust Fund (indicate GEF TF; LDCF; SCCF; NPIF):	GEF TF	In case of revision, new expected completion date	10/20/22
Executing Agency / Implementing partner:	Conservation International-Guyana		
Other executing partners:	Guyana Gold and Diamond Miners Association (GGDMA)	Guyana Geology and Mines Commission (GGMC)	
<b>Project financing</b>	<u>At the date of CEO endorsement (US \$)</u>		<u>At the date of the Mid-Term Evaluation (US \$)</u>
			*
(1) GEF financing	USD 2,652,294		USD 781,631
(2) CI contribution	USD 2,000,000		USD 1,154,767
(3) Government:	USD 649,600		USD 139,833
(4) Other partners:	USD 487,000		
(5) Total co-financed (2 + 3 + 4):	USD 3,136,600		USD 1,294,600
<b>TOTAL COST OF THE PROJECT (1 + 5):</b>	<b>USD 5,788,894</b>		<b>USD 2,076,231</b>

## I.1 Project description

Guyana's Artisanal Small and Medium-scale Gold Mining (ASGM) sector has been in existence for more than one hundred years. The Guyana Mining Act (1989) gives the ASGM sector legal status, with the scale of mining (small, medium, or large) dependent on the size of the dredging equipment and technology used. The ASGM sector accounts for 70 percent of the country's gold production.

Gold in Guyana is produced primarily by hydraulic dredging and sluices, and mercury is used in the final stage of the gold extraction process (amalgamation). Mercury is used primarily by the ASGM sector; the large-scale miners use cyanide. Mining is the largest consumer of mercury and accounts for 94 percent of Hg emissions (Ministry of Natural Resources, 2017). Between 2008 and 2010, an estimated 60,000 kg of mercury was imported annually.

Miners often do not follow safety measures when working with mercury, and the waste is released into the environment since there are usually no containment structures for the generated waste. The main barriers for shifting to mercury-free mining have been identified as lack of knowledge on the harmful effects of mercury, the demonstration of and financing for mercury-free technologies, and market incentives for producing mercury-free gold.

The Project Objective is to assist Guyana to meet its commitment under the Minamata Convention by involving business enterprises, with a profit motive, in leading the shift towards the development of a mercury-free ASGM supply chain, and downstream El Dorado Gold branded jewelry.

The Project comprises the following six components:

- Component 1: Appropriate mercury-free technologies mainstreamed in Guyana's ASGM sector.
- Component 2: Mechanism for financing capital investments for mercury-free technologies established and functional.
- Component 3: Markets established for branded mercury-free Gold produced in Guyana.
- Component 4: National policies and incentives for mercury-free gold established.
- Component 5: Monitoring and Evaluation.
- Component 6: Communications and Knowledge Management.

## I.2 Summary of the project's progress

During FY20, the project reached the mid-term of the implementation phase. Overall, the project is behind in establishing the demonstration sites and starting the mercury-free activities with miners. This is due to several reasons. First, there were difficulties finding concessionaires willing and able to satisfy the criteria for demonstration sites. Second, the COVID-19 global Pandemic which affected the project due to restrictions imposed in the country to contain the virus. Those restrictions prevented the project from continuing the activities in the three intervention regions due to restrictions in international and national travel. Lastly, some field

activities were scaled back in February 2020 to avoid conflicting with campaign events during the run-up to the national and regional elections on March 2, 2020.

As of June 30, 2020, a winner was still to be declared, with accusations of elections fraud, a national recount, and multiple court challenges taking place during the period. Further, the launch of a Consultancy to develop a Financing Mechanism was delayed given it would require a range of face-to-face consultations with private and public sector stakeholders that could not be arranged under the restrictions that were in place. Also because of the pandemic-related restrictions, a second visit to Guyana scheduled for consultants undertaking a Value Chain, Standards and Branding Assessment of mercury-free gold in Guyana, was postponed and the Consultancy could not be completed within FY20 as was planned.

Efforts have been made to progress in areas by adjusting implementation approaches to suit the changed circumstances. The Scope of Work for Consultancies has been revised to ensure a successful conclusion under the current conditions. These include incorporating online consultations, working sessions, and remote training into the methodologies for completing the consultancy for the Value Chain, Standards and Branding Assessment, and for developing the project's Monitoring and Evaluation Framework. Similarly, the consultancy through which the Communications Strategy is being developed was adjusted to remove the need for face-to-face stakeholder consultations. These have been replaced by online and telephone consultations. With respect to field activities, the situation is being continually assessed and plans are in place to re-mobilize quickly and efficiently to conduct preliminary assessments, prospecting activities, and environmental/social assessments as soon as it is safe to do so.

This readiness includes ensuring the appropriate post-COVID-19 actions are taken in keeping with CI Guidelines for reengagement with Stakeholders, paying strict attention to FPIC guidelines. All this unlikely to commence before Q4 of FY21. Despite the delays, some key achievements were completed in this year. Those achievements are presented by project component as follows.

Component 1: Appropriate Mercury-Free Technologies Mainstreamed in Guyana's ASGM Sector Engagement with miners working in the three project-focused Regions revealed that across all three regions, miners were aware of mercury-free technologies but few owned or used them and even less had success with the new technologies. This research also established that miners had a strong interest in learning about mercury-free mining technologies but were concerned about the cost.

The project team partnered with the Guyana Geology and Mines Commission (GGMC) to mobilize suitable mercury-free processing equipment and conduct mobile demonstrations at locations within project-focused Regions. These demonstrations provided valuable information and learning that positions the project to further strengthen capacities to ensure more effective field activities. One permanent demonstration site was identified in Region 1, but field activities to prepare the site for demonstrations were halted two days before commencement, due to the spread of COVID-19, and subsequent restrictions that are still in place. Region 1 has 3 since become one of the Region's most severely impacted by COVID-19 spread in Guyana.

Despite several advertised calls for Expressions of interest (EOI), there were no responses from suitable Concessionaires from Regions 7 and 8 for several months. However, utilizing a targeted approach, one EOI was received from Region 7 towards the end of Q4 of 2020/Q2 FY21, but the current restrictions have made it impossible to arrange the requisite preliminary visit to the area. It is expected that the use of a targeted approach is likely to also yield success in the



identification of a demonstration site in Region 8. To further strengthen national capacities and facilitate improved demonstrations of mercury-free technologies and practices, a training program has been designed in partnership with Mercer University, Georgia, USA. The soon-to-be formalized partnership will produce a curriculum and associated protocols and provide hands-on training of trainers for GGMC, the Mining School, and other partners and help improve technologies to avoid mercury emissions from gold shops. Building this capacity within relevant national partners will help support the accelerated adoption of mercury-free mining technologies and sustained reduced mercury use within the ASGM sector.

Component 2: Mechanism for Financing Capital Investments for Mercury-Free Technologies Established and Functional. Following the receipt of proposals in response to a call issued, a firm was selected to design a Long-Term Financing Mechanism to support miners in transitioning to the use of mercury-free mining technology. The consultancy commenced early in FY21 with a kick-off meeting and then desk research producing a high-quality synopsis of the economics of the sector and indicating a potential for positive and attractive returns. This activity required a significant number of in-person consultations, but ahead of that phase, as necessary, a rigorous baseline assessment of ASGM financing with two planned “round table discussions” were conducted remotely to ensure continual progress.

Component 3: Markets Established for Branded Mercury-Free Gold from Guyana. The Project applied to the Guyana Registrar for the El Dorado Gold brand trademark for mercury-free gold produced in Guyana. The application was approved in April 2020 and the Certificate was issued in June 2020 and remains in-force until March 2026. Significant progress was made by consulting firm The DragonFly Initiative (TDI) in reviewing the PlanetGOLD Criteria for Environmental and Socially Responsible Operations and to contextualizing them for Guyana’s context. Follow up engagements with stakeholders are required to fill the identified gaps and design and test the chain of custody system, which must await the lifting of travel restrictions. As TDI continued its efforts to complete work where possible, A joint assessment with CI-Guyana took place in 2020 of what remains to be achieved under the Consultancy. An agreement was reached on the best approach to having the remaining work completed under the circumstances where the Consultants are unable to travel to Guyana in the foreseeable future.

Component 4: National policies and incentives for mercury-free gold established Collaboration commenced with the Ministry of Natural Resources (MNR) on stakeholder consultations for the development of the Minamata National Action Plan (NAP). The Consultant hired to identify the gaps in Guyana’s legislation has completed the desk research which will inform amendment of policies and legislation for the reduction of mercury use in the ASGM sector. However, the arrangements for said Consultations have been placed on hold due to the existing COVID-19 restrictions.

Component 5: Monitoring and Evaluation. The project’s Monitoring & Evaluation Consultant commenced discussions with the MNR that will inform what is required for the development of a system to track and monitor and report on the use of mercury by miners in the ASGM sector. The Project has committed to supporting the MNR in this regard. A consultant was contracted to develop a Monitoring and Evaluation Framework. The Project Results Framework and a Results Management Plan are in-place.

Component 6: Communications and Knowledge Management. Several knowledge products were produced over the year, including posters highlighting the dangers of mercury and actions to reduce exposure, a video featuring a gold buyer telling his personal experience of mercury

poisoning, a video capturing work undertaken over the first year of implementation of the project, and a blog detailing the story of mining in Guyana and the importance of shifting away from mercury use in Guyana’s ASGM sector. These products have also helped profile the Planet Gold project with the videos being featured at the third Conference of Parties in Geneva and the blog featured on the “Voices” page of the PlanetGOLD website.

Safeguards: All applicable safeguards plans were updated over this past year and their implementation advanced. The Accountability and Grievance Mechanism (AGM) was designed and the development of a database to support implementation commenced. Stakeholders' 4 awareness of the safeguards was also enhanced through engagements and the production of communication materials targeting stakeholders. The Social and Gender Assessment was completed, and the findings informed a revision of the Gender Mainstreaming plan. It is intended that the Assessment Report will be peer-reviewed for publishing early in FY21.

**Table 1 Summary of MTR Valuations and Achievements**

Parameter	MTR valuation	Description of achievement
<b>Project strategy</b>	Satisfactory	<p>The GEF Project Document did not have a Theory of Change (TOC). The TOC is important to align the project architecture to the project context. It is essential for the Minamata process and for Implementing Agencies to align all projects around a viable TOC. The TOC must incorporate the issue of trust because without it, market incentives might not matter because technology could be rejected. If we focus on the intended result of technology adopted as an integral part of the Theory, AAE suggests that the TOC is two related hypotheses: that the technology will perform to the stakeholder’s expectation and that a branded marketing scheme will create added value.</p> <p>The Results Framework is overly dependent on Component 1, which therefore becomes a pre-requisite for Components 2 (financing), 3 (Branding and marketing) and 5 (monitoring). This creates an internal risk. A specific achievement was adding a dedicated mining technician to the team and maintaining and developing further relationships with sector organization.</p> <p>The regions have shifted. Region 9 was eliminated due to government priority actions. Region 1 fell to intense COVID pressure. Samples were taken in Region 7. Full exploration is underway at that site. A second promising site in region 8 is under consideration for exploration. The project Regions are now 7, 8 and possibly 1 if the COVID-19 situation improves, as compared to 1, 8 and 9 at the start of the project.</p> <p>Another achievement was a consultancy to define the M&amp;E Framework in component 5, which provided insight to changes needed in several indicators of the project.</p> <p>The project context and strategy are however complete, and 2 key roundtable discussions have shed light on key assumptions that were missing from the project context and therefore enabling a response.</p>

<p><b>Progress in achieving results.</b></p>	<p>Objective: <b>Satisfactory</b></p>	<p>To achieve the objective, progress must be made mainly, on component 1 of the project. Component 1 is the most critical component to the project but had only 21% budget execution at the time of the MTR. The performance on the delivery of the outputs contributing to the outcomes was rated as “S,” or <i>Satisfactory</i> because the management team demonstrated their ability to keep moving forward despite 2 incredibly significant challenges: Political Change and lockdown due to COVID. Individual ratings for each Project Management and for Each component are also in that range, except for Component 6 (Communication and Knowledge Management) which garnered a Highly Satisfactory or (HS) rating. Most importantly, the team seems to be on-track to complete all but 2 of the outputs and performance is trending positively.</p>
	<p>Result 1.1: <b>Satisfactory</b></p>	<p>Engagement with miners working in the three project-focused Regions revealed that across all three regions, miners were aware of mercury-free technologies, but none owned or used them. This research also established that miners had a strong interest in learning about mercury-free mining technologies but were concerned about the cost. The project team partnered with the Guyana Geology and Mines Commission (GGMC) to mobilize suitable mercury-free processing equipment and conduct mobile demonstrations at locations within project-focused Regions. These demonstrations provided valuable information and learning that positions the project to further strengthen capacities to ensure more effective field activities.</p> <p><u>One permanent demonstration site was identified in Region 1</u>, but field activities to prepare the site for demonstrations were halted two days before commencement, due to COVID-19 restrictions. Despite several calls for Expressions of interest (EOI), there were no responses from suitable Concessionaires from Regions 7 and 8 for several months. Subsequently, one sites, in Region 7 has been identified sampled and exploration is underway. One site in region 8 has been identified but the quality of the site is yet unconfirmed.</p> <p>The follow-up visits to conduct prospecting activities and a rapid environmental and social assessment were organized and scheduled but then postponed due to the occurrence of COVID-19 in Guyana. These assessments were conducted in early 2021, after field activities were approved with COVID-19 protocols in place.</p> <p>All preparatory procurement steps were taken inclusive of sourcing quotations from suppliers, awaiting the ease of COVID-19 related restrictions to execute final purchase and secure equipment for the establishment of the first demonstration site.</p> <p>The identification of gold shop owners, beyond those in Region 1, who are willing to work with the project has been stymied by the impact of COVID-19 in the project-focused Regions. The project has generated interest among concessionaires and initiated discussions, that has not been the case with gold shop owners.</p>

		<p>The Project remains optimistic that gold shop owners in Region 7 will work with CI-Guyana to improve their Mercury Capture Systems. However, this identification process leading to the signing of Agreements is dependent on the resumption of project activities. Quotations were sourced for the air testing equipment to be used for testing the levels of mercury emissions in gold shops. Procurement will be done as soon as the resumption of such activities is approved.</p> <p>A draft Grant Agreement was prepared and shared with Mercer University for their consideration. Mercer had proposed that the Agreement be revised to have remote training of trainers conducted using a series of 10 videos followed by 10 online sessions, as an initial period of collaboration. A second Agreement that includes in-person demonstrations and “on the ground” assessments of Mercury Capturing Systems will be determined on the basis of the COVID-19 situation in the USA, particularly Georgia and in Guyana.</p>
	<p>Result 1.2: <b>Satisfactory</b></p>	<p>Several activities were planned under this output including prospecting, site assessments and procurement. The project has assessed a site in region 7 with exploration to begin. A site in region 8 qualified and is slated for further investigation. CI-Guyana and GGMC have begun limited in-person work in the regions which have partially reopened. This is the cornerstone activity of the project.</p>
	<p>Result 1.3: <b>Satisfactory</b></p>	<p>Arrangement for in-country exchange visits to expose miners and manufacturers of mining equipment to the use and fabrication of mercury free technologies and practices was tied to the establishment of at least one “permanent” demonstration site which would allow for in-country exchanges among stakeholders.</p> <p>Although still delayed, the team is looking to the recommencement of stakeholder engagement, utilizing the CI Guidelines on Re-engagement Post COVID-19 to determine specific measures to minimize the risk of COVID-19 transmission, particularly among key project partners in indigenous and rural communities. The realities on the ground where recent increases in numbers of persons infected have led to the further postponement of these exchange visits to Q3 FY21, at the earliest.</p> <p>Demonstrations have been realized as well as information events.</p>
	<p>Result 2.1: <b>Satisfactory</b></p>	<p>The Canadian International Resource and Development Institute (CIRDI) was awarded the contract to develop the financing mechanisms. They submitted an Inception Report and Baseline Assessment of Knowledge and Needs and implemented a Financing roundtable Event in February 2021.</p>
	<p>Result 2.2: <b>Moderately Unsatisfactory</b></p>	<p>A Consultant was contracted to provide institutional Strengthening for the National Mining Syndicate Secretariat. NMS has decided on batch of members to be trained in the first instance, starting in FY21 Q3. An MU was assigned because the programs could have been developed and approved with only</p>

		implementation left to go. These are themes that GGMC, GWMO and the PMU know well and know what needs to be included.
	Result 3.1: <b>Moderately Unsatisfactory</b>	Identification of standards for “responsible/mercury-free gold” most appropriate for this project considering their acceptability and adoption by international downstream actors continues to be delayed due to the COVID-19 pandemic in Guyana which has resulted in the continued postponement of the Consultant’s second visit to Guyana. A decision was reached with respect to completing specific activities through the support of the project team that is beyond what was originally anticipated. Individuals from the project team were identified to lead the work to be done “locally” to support TDI’s continued efforts. A contract amendment with deadline extended was finalized.
	Result 3.2: <b>Satisfactory</b>	Assessment of Guyana’s international artisanal small-scale gold mining value chain through desktop review, interviews, site visits and focus groups discussions is in progress, however delayed due to restrictive travel. The joint assessment of progress under this activity, concluded that the presence of TDI in Guyana was a prerequisite for the successful completion of this activity based on how it has been designed.  The TDI draft report provided a broad frame for a mining value chain report with findings, which the joint status review of consultancy Consultants concluded, can only be properly completed after a follow-up visit to Guyana. However, the collaborative effort during this quarter by TDI and the project team, moved the work forward significantly. The report will be finished in Q4 of FY21
	Result 3.3: <b>Moderately Unsatisfactory</b>	Activities were planned to identify a chain of custody process and a verification mechanism for ‘El Dorado Gold.’  <b>Activity 1:</b> Identification and assessment of potential chain of custody and verification mechanisms for ‘El Dorado Gold,’ that are practical for the Guyana’s context as well as accepted by the national and international markets and downstream buyers, based on international success stories and best practice: The TDI consultants had completed a very preliminary assessment of the chain of custody and verification mechanism as reflected in their draft report.  <b>Activity 2:</b> Feasibility and SWOT analysis for potential chain of custody and verification mechanisms. This activity is directly dependent on the results of Activity 1 of Output 3.3, immediately above. All efforts continue to be made to ensure these assessments are conducted through the collaborative efforts of the project team and TDI.  <b>Activity 3:</b> Development of chain of custody and verification mechanism report with findings and recommendations. The collaborative effort during this quarter by TDI and the project team, moved this activity forward significantly but the finalization of the Report was not yet possible.

	<p><b>Activity 4:</b> Engagement with international downstream companies to inform acceptable verification mechanisms and implementation process (linked to Outputs 3.4 &amp; 3.5). These engagements with downstream companies, remain dependent on the conclusions drawn by TDI from discussions still to be held with Mine Operators and other key stakeholders in the ASGM sector.</p>
<p>Result 3.4: <b>Moderately Unsatisfactory</b></p>	<p>Four reports are programmed and in progress to develop El Dorado Gold’ brand, institutionalized and linked to the GEF Gold brand:</p> <ol style="list-style-type: none"> <li>1. Analysis of historical and cultural attributes of ‘responsible gold’ in Guyana and use of ‘El Dorado Gold’ to provide the basis of trademarking the brand.</li> <li>2. SWOT analysis of marketing “El Dorado Gold” locally and internationally.</li> <li>3. Engagement with international downstream companies with respect to marketing strategies.</li> <li>4. Development of report with findings and recommendations.</li> </ol> <p>The delays reported in activities to identify a chain of custody process and a verification mechanism for ‘El Dorado Gold, made it impossible for TDI’s work in this area to have progressed. Engagements with downstream companies, remain dependent on the conclusions drawn by TDI from discussions still to be held with Mine Operators and other key stakeholders in the ASGM sector. The date of submission of these reports will be determined by the revised dates to be agreed on based on an extended Consultancy timeframe.</p> <p>The El Dorado Gold Brand was officially licensed in Guyana.</p>
<p>Result 3.5: <b>Moderately Unsatisfactory</b></p>	<p>To achieve that El Dorado Gold producers be linked to national and internationally responsibly produced gold markets, progress must be made through the engagement with international downstream companies to inform acceptable social and environmental standards, verification mechanisms and marketing strategies. However, all engagements with international downstream actors have been put on hold until such engagements can be informed by complete discussions held on the ground.</p> <p>Also, progress must be made in identifying global markets for responsibly mined mercury free gold. This activity can only be realized after the characteristics and quantities of mercury-free gold available for export are determined.</p>
<p>Result 4.1: <b>Satisfactory</b></p>	<p>The MNR has confirmed that The Legal Consultant has completed the Review of the Institutional Assessment conducted in 2016 that included a Gap analysis of Guyana’s Laws vis-à-vis legal requirements as per Minamata Convention. However, though the Desk Review was completed, the required consultations with key</p>

		stakeholders and decisionmakers continue to be delayed as a result of COVID-19.
	Result 5.1: <b>Satisfactory</b>	Discussions with MNR and NAP Consultant revealed the need for an Initial Assessment to establish baselines prior to developing a comprehensive process for the monitoring and management of mercury use in the sector. In support of a monitoring process, GGMC has started to collect data by establishing a mercury register to tracking how much mercury is used by individual miners. Several interinstitutional missions have taken place.
	Result 6.1: <b>Highly Satisfactory</b>	The Consultant experienced some challenges in accessing a sufficiently large sample size for the gap analysis and some adjustments to the consultant’s approach to completing that analysis were recommended by the project team. However, the Communications Strategic Plan was completed. an HS is awarded for the quality of the work delivered and for the overall planning and performance of the communications unit.
	Result 6.2 <b>Satisfactory:</b>	Due to continued uncertainty around COVID-19, the project is exploring options for the type and scale of conference to be held. The project team will be examining the options for the conference in Q2 with the intention to host it in Q3 or Q4 FY 21.
	Result 6.3: <b>Highly Satisfactory</b>	<p>The Communications Focal Points shared information on how activities were affected by the pandemic. They also shared ideas about shifting some energies to focus on producing COVID- 19 related material for circulation among mining groups.</p> <p>A blog on Humanizing Gender dynamics within Guyana’s ASGM sector was created and was featured on the PlanetGOLD website. The piece focuses on the experience of women in the sector and seeks to promote an understanding of gender- based differences, in terms of Both experiences and influence.</p> <p>A Field Video demonstrating how to operate three pieces of equipment used in mercury free mining operations – Gold Kacha, Gold Cube and Blue Bowl - was produced. The video explains their key features and the most effective way to use them. Using this, the project team and partners can demonstrate the pieces to the miners during Education and Awareness sessions. Also, this video was shared directly to miners via dedicated WhatsApp groups and other social media platforms in Q2.</p>
<b>Implementation and adaptive management of the project</b>	<b>Satisfactory</b>	Overall, the PMU received a Mid-term Rating of “S” or Satisfactory. In most of the parameters, the PMU scores “HS” the highest ranking for excellence in recruiting qualified staff and consultants, establishing a productive work environment, Monitoring and Reporting, Interinstitutional Relationships and Financial Management. An “S/green” was awarded for Proactive and Adaptive Management and “S/yellow” and “MS” for Planning and Budget and Managing Risks, respectively. The latter two relate to responding to and preparing for a post COVID surge of activities. Barring further outbreaks of COVID the PMU is on track to achieve at least 11 of 13 outputs.

<b>Sustainability</b>	<b>Moderately Likely</b>	At this point and because of political change and COVID-19 that have caused delays in the project, evaluator does not have sufficient inputs to analyze the financial, socioeconomic, institutional, and environmental sustainability in this exercise. The Risk Analysis examined the likely risks faced by the project in striving for sustainability. These will need be evaluated at the Terminal Evaluation (TE).
-----------------------	--------------------------	--

### I.3 Summary concise conclusions

- a) The project conforms to all pertinent policies and plans.
- b) There are elements of the baseline that were not clearly understood that explain the drivers behind the ASG Miner’s behavior. Why ASG Miners do they do what they do? Will they reject new technologies for socio-economic reasons? These are questions that influence the success of failure of the Project Strategy.
- c) The Project Strategy does not include a TOC. The TOC presented does not go to the root of the production culture of the ASG Miners. Why do poor producers reject changes in technology? The miners are more interested in a refined production process will yield more Au and lower cost of inputs (Hg). The TOC therefore has two interlinked hypotheses: (a) improved production technology will yield more gold with no mercury and (b) farmers will make more through a branded market scheme.
- d) The project strategy is based-on an untested assertion or assumption that the available technology will produce an acceptable outcome for currently non-sedentary ASGM producers within the socio and economic and technological variables that could surface converting them to sedentary systems. It is a killer assumption: high impact; high likelihood and a high consequence to the long-term program to address Mercury in Guyana’s ecosystems.
- e) Project Design: When the TOC is given clarity, the suite of components, outcomes and outputs will eventually contribute to the objective. Therefore, the project correctly embraces all the elements necessary to reduce the barriers over the long term.
- f) Project Design: Several indicators (1.2.1, 2.2.2, 4.1.1, and output 5.1) require adjustment to make them cohesive with the outputs and outcomes they are monitoring (Table 3). The MTR concurs with the suggestions by Dejong, 2020 as presented in [Annex IX: Suggested Project Results Framework](#).
- g) Project Design: With respect to Component 1, the time and effort for evaluating the ore body was significantly underestimated, a significant part of the delay in deploying demonstrations. Site plans based on Initial grab samples, full prospecting, and determination of type of technology should be treated as an output.
- h) The multiple-stakeholder Round Table Discussions held by the Sector agencies and the PMU have been successful in engaging stakeholders and building trust.
- i) Project is underperforming due to the effects of COVID.
- j) There is a productive base and momentum to recover lost time and realize most of the outputs.



- k) The logical framework of the project requires improvements in indicators.
- l) This is a high-risk Project due to persistent and new significant risks. Section [VI Modified Risk Assessment](#) describes risks identified during the project formulation stage that were understated, one risk that was a killer assumption, and new risks in climate change and COVID-19.
- m) Deployment of project resources needs to be rescheduled with new targets.
- n) The PEU is efficiently and adaptively managing the project's resources.
- o) There is duplication of efforts across projects.

**Table 2 Summary of Recommendations**

Rec #	Recommendation	Entity Responsible
A	<b>Project Justification</b>	
A.1	<b>Key Recommendation 1:</b> TOC: Review the suggested TOC with partners to make sure the messaging and focus of the components matches the expectations of the beneficiaries.	PMU, PSC
A.2	<b>Key Recommendation 2:</b> Do not redesign components. Consider changing the approach or focus of each component (See recommendations per component) to effectively delink them in the eyes of the beneficiaries.	PMU
B	<b>Project Strategy</b>	
B.1	<b>Key Recommendation 3:</b> Test the assumption that the available technology will produce an acceptable outcome for ASGM producers within the socio-economic and technological variables that could surface in demo areas. In promoting the demos, focus the C1 demos on understanding the efficiency of the equipment and the yield. Create conditions for no-risk experimentation by miners (see recommendation below). Provide a technician to accompany the demos 100% of the time to measure the variables such as throughput, output (Au/ton processed), Labor inputs for OPEX, and the Hg reduction calculation. This information will indicate that the equipment is correctly deployed and utilized according to specifications.	PMU, GGMC, GGDMA
B.2	<b>Key Recommendation 4:</b> Adjust the language of log frame indicators 1.2.1., 12.2.2., 4.1.1., and output 5.1 is necessary to correct irrelevant constructions. Correct Language per Table 3 or as presented in Annex IX	CI-GEF, PMU, PSC
C	<b>Overall Project Design</b>	
C.1	<b>Key Recommendation 5:</b> Consciously update the baseline through measurement of the Hg baseline, economic conditions of the mining operation and efficiency of equipment through a survey and through trials with control groups for Hg. Capture the information as part of the development of the site plans and installation of demonstration areas in Component 1 and through the Monitoring System in Component 5.	PMU, GGMC, EPA
D	<b>COMPONENT 1: Appropriate mercury-free technologies mainstreamed in Guyana's ASGM sector</b>	
D.1	<b>Key Recommendation 6:</b> Successful implementation will require that the entire organization strategically deploy all of their professionals' assets in the project to Region 7. This involves an all-hands approach between Mining technicians,	PMU, GGMC, GGDMA

	safeguards, gender, communications, etc. from CI-G and from partner organizations	
D.2	<b>Key Recommendation 7:</b> Ensure deployment of 2 demo's in semi-controlled circumstances. Use that information to reassess the assumptions related to the process aspects of the project. Process the monitoring information within the framework being developed for component 5. Because of the time left in the project, do not disperse resources seeking a third demo site until the first 2 in regions 7 and 8 have gone online or have been abandoned for lack of ore quality.	PMU, GGMC
D.3	<b>Key Recommendation 8:</b> Assure an adequate control group to arrive at a conversion factor for no. of grams of Hg per gr. of Au processed.	PMU, GGMC, EPA
D.4	<b>Key Recommendation 9:</b> A validation of the target 1.2.1. "The no. of pounds of Hg" is required to adjust expectations	PMU, GGMC, EPA
E	<b>COMPONENT/OUTCOME 2: Mechanism for financing capital investments for Mercury-free technologies established and functional</b>	
E.1	<b>Key Recommendation 10:</b> Change the indicator 2.2. from "the number of financial mechanisms" to "the amount of money that will be made available to miners through the Financing Mechanism"	PMU, PSC
E.2	<b>Key Recommendation 11:</b> Implement the recommendations from the financing roundtable. Work with a dedicated group to define system-level actions for macro financing of the ASGM subsector or to capitalize larger scale opportunities. Consider a lend-lease strategy for the short-term or for implementing demos in Component 1.	PMU, GGMC, GGDMA, GWMO <i>et.al.</i>
F	<b>COMPONENT/OUTCOME 3: Markets established for branded mercury-free gold from Guyana.</b>	
F.1	<b>Key Recommendation 12:</b> Build a team and include GGB or have them chair to define the pathway for a no-mercury gold policy. A dedicated public-private team will assist the consultants in completing the outputs. Connect the team and the GGB director to PlanetGold and other networks such as RMI, ARM, etc.	PMU, GGB, MNR
F.2	<b>Key Recommendation 13:</b> The consultants do not need to wait for Component 1. There is non-mercury Gold 'produced in Guyana that can be used to develop the brand, the connections, protocols, and test the system. As the demonstrations come online, the ASGM can be incorporated, and the full system developed.	PMU, consultants
F.3	<b>Key Recommendation 14:</b> Ask for help. The PlanetGold network and others will be willing to help think through the rough spots. Make extensive use of PlanetGold Parent Project resources for international markets and buyers. The roundtable concept seems to be working well in Component 1 and Component2. Facilitate a public-private working group can tackle the issues.	CI-GEF, PlanetGold, PMU, GGB, GGDMA
F.4	<b>Key Recommendation 15:</b> The Project could gain time working with GGB to establish the pathway with mid-sized or large producers using non-mercury processes. GGB is interested in exploring opportunities to improve Guyana's Brand and reputation with respect to quality control.	PMU, GGB, GGMC, GGDMA
G	<b>COMPONENT/OUTCOME 4: National policies and incentives for mercury-free gold established</b>	

G.1	<b>Key Recommendation 16:</b> Produce a brief document that clearly lays out the actions, products, and expected results would be welcome for a terminal evaluation.	MNR, PMU, PSC
G.2	<b>Key Recommendation 17:</b> The anticipated NAP for the Minamata Convention will provide policy guidance. The Project should support the multi-stakeholder to develop those policies. Delivery is expected in Q3 of FY21 and a gap analysis has been completed. It can provide expert support to MNR, GGMC, and also GGB if requested to produce the requisite regulations that facilitate the production, financing and marketing of MFG and support the policy recommendations of the NAP	PSC, Minamata Working Group, PMU
G.3	<b>Key Recommendation 18:</b> Consider a policy working group or inter-agency task force to define the types of policies needed and to consolidate the work of the different working groups. Their role will be to produce a high-level White paper or draft policy options, suggesting a pathway to support a responsible gold commodity chain and turn NAP recommendations into policy. They can report to the Minamata Working Group. Better program expenditures to the end of the project based-on the agenda of the group.	Minamata Working Group, PSC, PMU, GGB
H	<b>COMPONENT/OUTCOME 5: Monitoring and Evaluation</b>	
H.1	<b>Key Recommendation 19:</b> The compliance divisions of MNR and EPA are not mentioned. Improve the visualization of the strategy to monitor mercury. Define the strategy for developing this capacity within MNR, EPA, GGMC, GGB, etc.	MNR, EPA, PMU
H.2	<b>Key Recommendation 20:</b> A clear and bankable strategy will be an especially important asset for future development within the sector and within the NAP implementation program.	PMU, PSC
I	<b>COMPONENT/OUTCOME 6: Communication and Knowledge Management</b>	
I.1	<b>Key Recommendation 21:</b> Given the quality of the communications materials, strategically deploy communications assets to the communities targeted for the demonstrations in Component 1 to increase buy-in of local miners, authorities, and jewelers. The communications team should devise a strategy to facilitate the transition to mercury free mining based on the experience of using a jeweler to tell the story from the demand side. The same recommendation holds for Component 4 in promoting policy suggestions	PMU, GGMC
I.2	<b>Key Recommendation 22:</b> A suggestion made during the interview was to seek out language savvy persons from different indigenous communities that may presently work in the mining industry, even large-scale mining, to be the face of the initiative or to work as interpreters of both technology and language	PMU, NTC, GGMC
J	<b>Risks Assessment and Management of Risks</b>	
J.1	<b>Key Recommendation 23:</b> Delink the technology from the market forces. Let the miners know the project (and they) are trying to find a better way to capture more gold from the existing ore body with less loss and less cost (no mercury). Create the conditions so that they can try the technology without risk to their businesses for one month (see ideas in report).	PMU, GGB, GGMC, GGDMA
J.2	<b>Key Recommendation 24:</b> Risk/C1 Theft/Security is a serious concern for ASGM. The claim of theft could also contaminate the data taken in component 1 needed to set up a technical operation that works and for component 2: a dedicated financing mechanism. Have a dedicated mining technician on-site for the duration of the trials to validate claims of theft. Is there another collective solution? Are there other ways miners protect themselves? Women? What is the contingency for theft?	PMU, GGMC

J.3	<b>Key Recommendation 25:</b> Risk/C1/Participation of GGDMA-GWMO 1. Eliminate this from the risk table. The contingency would be to create a private sector or a public-private stimulus fund from the extractive industry to offset the negative environmental externalities of their own industry	CI-GEF, PMU
J.4	<b>Key Recommendation 26:</b> Risk/Climate/C1: evaluate if there is a history of severe weather events that could destroy equipment deployed in Component 1. The mining systems are riverine systems that might be vulnerable	GGMC, MNR, PMU
J.5	<b>Key Recommendation 27:</b> Risk/GGB/C3 does not recognize Mercury Free Gold: Develop a pathway with GGB, identify the support needed through component 3 or one of the other GEF Gold projects and sign an MOU to support that work. This is the opportunity for a policy proclamation sought in Component 3	GGB, PSC, PMU
J.6	<b>Key Recommendation 28:</b> Risk/"Sustainability of the project outcomes is unrealized at a landscape level"/C1: PMU should identify the actual risk to this outcome and consult the PSC. Once the NAP is ratified, it will become the policy instrument of reference. The NAP process is advancing with GEF funding through a separate grant to UNEP/ GoG. GGB has indicated their desire to brand all gold in Guyana as non-mercury. Evaluators agree that the rating is "moderate" until the variables are eliminated following the NAP process. For each risk, define actions to mitigate or contingencies if actions cannot be mitigated	CI-GEF, PMU,
K	<b>Gender &amp; Safeguards</b>	
K.1	<b>Key Recommendation 29:</b> Risk/Safeguards/ "Lessons learnt do not reach target audiences" is not a risk. This is a result. Identify the risks associated with this, if there aren't any, then remove this from the risk assessment table	PMU, PSC, CI-GEF
K.2	<b>Key Recommendation 30:</b> Risk/Safeguards/ "Climate Change": Review the Climate Change scenario for the region and determine what the effects could be on the ASGM sector. For example, if extended droughts are prognosticated for the indicated regions, then crop failure could be a reality and move more people into mining. Determine the reality for regions 7 and 8 where the activities occur.	PMU, GGMC, MNR
K.3	<b>Key Recommendation 31:</b> Risk/C1: "Geological events from mining activities": Eliminate or define	PMU, PSC, CI-GEF
L	<b>Project Management</b>	
L.1	<b>Key Recommendation 32:</b> Extend the project close by 6 months through a no-cost extension modality. This will enable technical staff to continue working until the formal closure date without drawing attention away from technical activities during closure. Evaluators base this decision on the positive trend in the delivery of project activities.	PSC, PMU, CI-GEF
L.2	<b>Key Recommendation 33:</b> Deployment of project resources needs to be rescheduled within a new work plan that puts all staff and partners with new and realistic timeframes for realizing outputs (See Table 7).	PMU, PSC
L.3	<b>Key Recommendation 34:</b> There appears to be a duplication of effort across all Gold Projects. The Minamata Working Group and the Implementing Agency should discuss how this can be eliminated.	PSC, Minamata Working Group, GEF Operational Focal Point
M	<b>Sustainability</b>	
M.1	<b>Key Recommendation 35:</b> Not enough information to gauge sustainability. Focus on the steps and data necessary to have a meaningful Terminal Evaluation	PMU, CI-GEF

## II. Introduction: Purpose, Scope, and Methodology

### II.1 Purpose of the MTR and objectives

The purpose and objective of the evaluation was presented in the published Terms-of-Reference (TOR) for the consultancy and were confirmed with the principal GEF, CI and government partners during an Inception Workshop held on 10 February 2021.

#### The subject of the review, and relevant context:

As defined by GEF, “a Mid-Term Review (MTR) means an assessment of a project’s or program’s performance and results, carried out for adaptive management purposes at the midpoint of a project’s or program’s intended duration<sup>1</sup>.” The MTR is an independent technical and financial evaluation of the *GEF GOLD/Supply Chain Approach to Eliminating Mercury in Guyana’s ASGM Sector: El Dorado Gold Jewelry – Made in Guyana Project (GEF ID 9713)*, a “full-sized” child project (subproject) within the overarching parent project entitled, *Global Opportunities for Long-term Development (GOLD) of the ASGM Sector GEF GOLD – (GEF ID 9602)* financed by the Global Environment Facility (GEF). In accordance with GEF requirements, Conservation International, the GEF implementing agency, has contracted an independent consulting firm, Asesoramiento Ambiental Estratégico –AAE– to execute the MTR. Given travel restrictions due to COVID-19, AAE partnered with a local partner, Spiral Consulting, to provide on-the-ground consultations in Guyana. The project is an important initiative that facilitates an enabling environment for compliance towards Guyana’s commitments under the Minamata Convention and contributes to the GEF Chemical and Waste Focal Area.

#### Purpose of the MTR:

The MTR is used by GEF Agencies and project partners as a mid-point monitoring tool to identify project progress, challenges, lessons learned and outline corrective actions to ensure that a project will achieve maximum results by its completion, it provides information, learning from good practice, lesson learned, and technical information needed to inform implementing and executing agencies involved in an adaptive management process. The MTR is an integral step in the project life cycle, and it is a cornerstone of the project’s monitoring and evaluation plan. The MTR also facilitates learning from good practice and stakeholder input to the decision-making process. For the GEF Secretariat, the MTR is an important portfolio monitoring and management tool. The main purpose of the MTR is to identify challenges and set the necessary corrective actions to ensure that the project is on track to achieve the maximum number of results before its completion. This is of critical importance in lieu of the global pandemic related shocks experienced in 2020 and extending into 2021. Due to delays related to COVID-19, the MTR was implemented approximately 10 months after the targeted date of March 2020.

---

<sup>1</sup> Global Environment Facility. June 2019. Policy on Monitoring, GEF/C.56/03/Rev.01 URL: [https://www.thegef.org/sites/default/files/council-meeting-documents/EN\\_GEF.C.56.03.Rev\\_01\\_Policy\\_on\\_Monitoring.pdf](https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.56.03.Rev_01_Policy_on_Monitoring.pdf) ; accessed 02 February 2021

Objectives of the MTR: What the MTR aims to achieve e.g. assessment of the results of the project, etc.

The following MTR report is the principal product that affirms (a) the relevance of the project actions to national, sector, and institutional plans; (b) the efficiency in the execution of the project workplan, (c) the effectiveness of the actions implemented in producing the desired outputs; and (d) the sustainability of the project as evaluated through the perspectives of policy, socioeconomic (including stakeholder and gender engagement), and environmental factors. The MTR directly measures the degree to which the implementation of the project's activities, when taken together, will achieve the project's outputs as measured by the indicators presented during the GEF approval stage. The MTR will also assess the likelihood that the project could contribute the stated outcomes and thereby setting the stage for an effective Terminal Evaluation (TE) process. The [TOR](#) for the MTR included in Annex 1 provides a complete list of Objectives and outputs for the MTR.

The focus of the MTR is primarily at the output level as these are framed in the Project's approved Results Framework (RF). In the Case of the El Dorado Gold Project, Dejong<sup>2</sup> provided a revision of the project's indicators in September 2020. The MTR also provides a comprehensive look at the project design including the RF and indicators for integrity and SMART<sup>3</sup> characteristics.

The MTR will also provide the GEF, Implementing and executing agencies and Stakeholders with a snapshot of project progress, an analysis of the integrity of the project design, and a prognosis for the eventual attainment of the project's contribution towards its stated outcomes. The MTR Report presented below seeks to provide conclusions and targeted recommendations to inform an adaptive management process for achieving maximum impact during the remaining project timeline.

## II.2 Scope of Evaluation

The scope of the MTR extends to the temporal, geographic, and thematic dimensions of the project.

The temporal dimension of the evaluation covers the mid-cycle of the project from the start of the project on 4 May 2018 to the end of the second quarter of operations on 31 December 2020, a period of 32 months with approximately 16 months remaining. The MTR is eight-months behind the scheduled date of April 2020. The MTR was implemented effectively from late January to March 2020.

The geographical dimension of the evaluation covers 3 regions: (a) the international realm including CI-GEF, GEF Agency as applicable, and international partners within the Planet Gold Parent project and representatives of aligned projects with influence on the target project's outputs. The second realm is Georgetown, Guyana, seat of government and agency partners and stakeholders. The third realm are the small-scale miners and jewelers in the communities where project activities take place. Originally, the regions were defined as, regions 1, Port

---

<sup>2</sup> Dejong, Terah. September, 2020. GEF-GOLD Monitoring and Evaluation Framework and Results Management Plan. Technical Report to Conservation International for the El Dorado Gold Project (GEF 9602).

<sup>3</sup> Specific, Measurable, Attainable, Relevant, and Time-bound.

Kaituma where project activities are observed as a baseline to assess project results or control groups; Region 8 (Mahdia/Campbelltown and the Upper Potaro area) and 9 the Marudi Mountain area. The mentioned regions were changed during the first semester of the project to regions 7 and 8. Region 1 was to serve as a control group was eliminated. Region 9 was abandoned due to changes in government policy in response to tension between indigenous groups and miners and illegal activities. The effects of these changes as well as the potential impact on the project were assessed and are discussed below. Due to COVID-related travel restrictions, all contact between the evaluation team and stakeholders was virtual.

The programmatic or thematic scope analyzes (a) the project justification to validate the underlying conditions to the Theory-of-Change (TOC) and the correlation of the intermediate results of the project to an adequately understood baseline and context; (b) the likelihood of the Project Strategy to achieve the projected outputs and eventually the stated outcomes; and (c) Feasibility of the project strategy and mechanisms for assessing and mitigating risks.

These areas were examined through information gathering and analysis within the following core thematic areas:

1. Project justification: Review of the project context (policy, environmental, socio-economic, country priorities, etc.), including the definition of problems and the barriers that impede actions towards effective responses to the stated problems. The MTR reassessed the project context to validate that the **relevance** of the project design to Guyana's evolving national and sector policies and to the priority areas of the PlanetGold Parent Project and the GEF has been maintained. The evaluators were interested in the possible strengthening or resurgence of the barriers or the development of new ones, especially given the economic effects of COVID.
2. Project Strategy: Analysis of the Theory-of-Change and the architecture of the project's outcomes, outputs, indicators, and targets, their SMART<sup>4</sup> characteristics as presented in the project's logical framework, and underlying assumptions. Of interest was the review of the **coherence** of the project's strategic formulation in relation to the original project context, problems, and barriers. Evaluators were also interested to validate the degree to which the project's outputs remain internally coherent based on the experience garnered through project implementation and through a changing political, social, and economic landscape. Coherence also refers to the integrity of the internal logic of the project as expressed in the relationship between activities to outputs, outputs to outcomes, and outcomes to the project's objective. In addition, evaluators analyzed the underlying assumptions that must prove true for the project's outcomes and outputs to be realized, in addition to searching for missing assumptions.
3. Progress Towards Results: The progress towards results is the logical evaluation theme that interests most stakeholders. Based on the Results Framework, AAE's evaluators reviewed the completion of the project's activities to gauge the progress towards meeting the outputs and reviewed the status of achievement of the output per corresponding indicator. This provides both a time-based assessment of progress and reveals if the suite of activities implemented are sufficient to produce the desired result. The progress towards the delivery of each output is ranked from Highly Unsatisfactory

---

<sup>4</sup> Specific, Measurable, Attainable, Relevant, Time-bound

(UH) to Highly Satisfactory (HS) with each output also being coded using the traffic light system with Green for “Completion;” Yellow for “Likely to be completed during the project;” and Red for “Unlikely to be completed.” in addition, progress towards GEF focal area indicators and a comparative review of tracking tools<sup>5</sup> was undertaken. Where deficiencies occur, a general forensic review of implementation related factors, barriers or the occurrence of project risks provided an understanding of the reasons for the ranking of performance noted. Conclusions and recommendations were noted to adjust the monitoring plan and to strengthen performance and achievement of the outputs, and ultimately outcomes, through an updated workplan.

4. Project Governance: The governance analysis reviews the project’s management modality, governance structure and decision-making framework for effectiveness and efficiency (as described later in this section. Evaluators also sought to understand the strength of the partnerships, their dynamics, the characteristics of each and their roles going forward and how these evolve from the roles originally set out at project initiation.
5. Safeguards: Safeguard mechanisms were prepared during the project formulation stage. These include stakeholder engagement, Gender, environmental, among others. Most of the safeguards include action plans and GEF policies and guidance, as presented above. These are important to the project to maintain a consistent dedication to stakeholder participation based on stakeholder diversity and to provide safe project alternatives that do not harm to the environment, communities, or individuals. Evaluators assessed the quality of these documents and the implementation of the various mechanisms.
6. Risks: An assessment of the project risk assessment in lieu of changing conditions since the beginning of the project.
7. Project Implementation and Adaptive Management: Technical and Financial execution, Project planning, monitoring, and reporting.
8. Sustainability: Assess financial, socio-economic, governance, environmental and other external risks to sustainability.

### II.3 Methodology

#### *The MTR Approach*

The evaluation was conducted in accordance with the Norms and Standards, ethical and conduct guidelines defined by the GEF guidance<sup>6</sup> on Monitoring including the following policies:

---

<sup>5</sup> GEF 6: Chemical and Waste Tracking tool approved 2015.

<sup>6</sup> Global Environment Facility. June 2019. Policy on Monitoring, GEF/C.56/03/Rev.01 URL: [https://www.thegef.org/sites/default/files/documents/gef\\_environmental\\_social\\_safeguards\\_policy.pdf](https://www.thegef.org/sites/default/files/documents/gef_environmental_social_safeguards_policy.pdf); accessed 02 February 2021.



- Environmental and Social Safeguards (SD/PL/03)<sup>7</sup> and Guidelines<sup>8</sup>
- Gender Equality Policy (SD/PL/02)<sup>9</sup> and Guidelines<sup>10</sup>
- Stakeholder Engagement (SD/PL/01)<sup>11</sup> and Guidelines<sup>12</sup>
- Principles and Guidelines for Engagement with Indigenous Peoples (GEF/C.42/Inf.03/Rev.1)<sup>13</sup>
- Minimum Fiduciary Standards (GA/PL/02)<sup>14</sup>.

These are in addition to CI's Policy stating that, *Mid-term reviews and evaluations will abide by professional and ethical guidelines and codes with respect to research on human subjects as described in CI's human research ethics policy was mindful of differences in culture, language, customs, religious beliefs, and practices of all stakeholders*<sup>15</sup>.

In addition to compliance with GEF and CI norms, the evaluation process sought a mixed methodological approach focused on accountability and learning and as a result, adaptive management. Naturally, the MTR was based on the analysis of the completion of activities that lead to the achievement of outputs and collectively in creating progress in achieving outcomes. Through that process, evaluators sought to not only understand what was accomplished, but more importantly, how it was accomplished. Hence, the evaluators were able to test conformity with the guidelines mentioned above and gauge management efficiency, effectiveness, and ultimately adaptive management. This was particularly important given the effects of COVID on project execution.

---

<sup>7</sup> Global Environment Facility. GEF/C.54/11/Rev.02 URL: [http://www.thegef.org/sites/default/files/council-meeting-documents/EN\\_GEF.C.54.11.Rev\\_02\\_Results.pdf](http://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF.C.54.11.Rev_02_Results.pdf) ; accessed 02 February 2021.

<sup>8</sup> \_\_\_\_\_, December 2019. Guidelines on GEF's Policy on Environmental and Social Safeguards. GEF/SD/GN/03 URL: [https://www.thegef.org/sites/default/files/documents/guidelines\\_gef\\_policy\\_environmental\\_social\\_safeguards.pdf](https://www.thegef.org/sites/default/files/documents/guidelines_gef_policy_environmental_social_safeguards.pdf) ; accessed 02 February 2021.

<sup>9</sup> \_\_\_\_\_, November 2017. Policy on Gender Equality URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Policy.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf) ; accessed 22 January 2021.

<sup>10</sup> \_\_\_\_\_, June 2017. Guidelines on Gender Equality. URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Guidelines.pdf); accessed 22 January 2021.

<sup>11</sup> \_\_\_\_\_, November 2017. Policy on Stakeholder Engagement. GEF/SD/PL/01. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Policy\\_0.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Policy_0.pdf); accessed 26 January 2021.

<sup>12</sup> \_\_\_\_\_, December 2018. Guidelines on the Implementation of the Policy on Stakeholder Engagement. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Guidelines.pdf) ; accessed 26 January 2021.

<sup>13</sup> \_\_\_\_\_, October 2012. Principles and Guidelines for Engagement with Indigenous Peoples. URL: [https://www.thegef.org/sites/default/files/publications/Indigenous\\_Peoples\\_Principle\\_EN.pdf](https://www.thegef.org/sites/default/files/publications/Indigenous_Peoples_Principle_EN.pdf) accessed 19 January 2021.

<sup>14</sup> \_\_\_\_\_, December 2019. Minimum Fiduciary Standards for GEF Partner Agencies. GEF/GA/PL/02. URL: [https://www.thegef.org/sites/default/files/documents/gef\\_minimum\\_fiduciary\\_standards\\_partner\\_agencies\\_2019.pdf](https://www.thegef.org/sites/default/files/documents/gef_minimum_fiduciary_standards_partner_agencies_2019.pdf) ; accessed 05 February 2021.

<sup>15</sup> Cite Terms of Reference.

Finally, AAE sought a participatory approach combining the evaluator's external assessment with the experience of internal and external stakeholders. This enabled the evaluators to maintain a fluid communication with the Project team, as well as representatives of implementing partners and stakeholder groups. Perspectives and proposals were openly exchanged during the process to develop and test realistic, practical, and readily implementable recommendations appropriate for the remaining timeframe of the project. In that context, the evaluation experience provided an opportunity for learning and problem solving.

#### *Evaluation Criteria and Key Questions*

The information obtained throughout the MTR is logically processed in terms of Progress towards results indicating “what” was accomplished. Information was also processed through two different lenses: effectiveness and efficiency, which define “how” the results were obtained. In addition, the relevance/coherence of the results with relation to the project design and national priorities and the analysis of sustainability of the results obtained define the parameters upon which the project’s execution was based. These are defined as follows:

#### **Effectiveness**

Effectiveness is a cross-cutting theme that focuses on gauging the delivery of the planned activities either from the components as measured through budget execution and completion of activities or with regards to safeguards, gender, stakeholder engagement, project management, etc. In the case of outputs, evaluators relied on monitoring the execution of the individual activities that produce the outputs as a level of advancement and on the indicators as a measure of fulfillment or achievement. For areas such as Gender Inclusion, where a wide range of indicators does not exist, evaluators included specific questions in an interview form (presented below) and on the delivery of specific activities as described in the different plans e.g. submitted for project approval. A review of the key assumptions was also implemented to explain why some areas of the project either excel or lag with respect to targets.

#### **Efficiency in Project Implementation and Adaptive Management**

Efficiency refers to the agility of the administrative process in delivering the project activities within the budget and timeframes specified for the project. Efficiency also encompasses the fluidity with which the project process was managed and the level of bureaucracy characteristic of the functions of the project management unit. Efficiency also involves recruiting the right staff and consultants to manage project functions in an efficient manner.

Efficiency is also evident in the quality of the monitoring systems, especially in the analysis of the administrative/financial actions and at the application of the work plan based on results (including the monitoring systems and instances of direction of the Project); all this to determine the adaptive management of the Project as defined as the ability of managers to strategically and proactively change directions and adapt to problems encountered, e.g., political change or COVID.

The analysis utilized budget revisions and changes that were made during implementation. To this end, programmatic and financial monitoring tools, monitoring reports from CI, operational plans and programmatic reports were reviewed. Interviews were held with key management and administrative personnel.

At the outset of the evaluation, the project completed 34 months of 48, with 14 months remaining. Budget execution appears to register a 29% execution rate. The efficiency required to execute the remaining budget through 14 months will be an important recommendation of the MTR, as well as the effect of COVID within the context of GEF Guidance for support to post-COVID-19 economies.

### **Relevance/Coherence of the Project Strategy**

Relevance and Coherence explores the linkages of how the components of the project, taken together can eventually contribute to the Objective of the project and to the National Priorities within which the project was framed. In addition to this, the project was also framed within Guyana's emerging National Action Plan for the MINAMATA convention, the Responsible Mining Initiative, and in the context of the PlanetGold, the GEF parent project.

### **Sustainability**

Sustainability will be analyzed from four areas: financial, socio-economic, institutional/governance and environmental. Given the relevance of financial sustainability to the project, special emphasis will be placed on this issue. The effects of COVID-19 will be analyzed as environmental threats to project sustainability.

The consultants also analyzed the actions carried out to strengthen individual and institutional capacities with the partners and the appropriateness of the strategies defined for this capacity transfer.

Sustainability also includes attention to safeguards. Evaluators reviewed the safeguards presented at CEO endorsement and related plans, including monitoring reports, assessments, PIRs etc. to determine whether management measures related to safeguards, including the grievance mechanism, are being effectively implemented. Evaluators also analyzed changes to the risk profile identified in the safeguard screening form and safeguard plans at the time of CEO endorsement versus the present situation.

Given the nature of the project, an Environmental Management Plan was not triggered at the approval stage. Given that the adoption or rejection of the mercury free technology could determine whether mercury will continue to flow into the ecosystem, evaluators are aware of the importance of analyzing whether additional safeguards might be triggered by project implementation activities.

With regards to the Stakeholder Engagement Plan, the team was interested in understanding the degree to which stakeholder views and concerns are considered by the project.

Finally, the sustainability of the financial mechanisms presented (component 2) was examined to determine if the mechanisms will be in-force by the close of the project.

### **Conclusions and Recommendations**

Due to COVID, the MTR is taking place with only approximately 14 months left to run. In that case, the conclusions, proposals and recommendations presented have been discussed with the Project Management team to expedite their decision-making and improve project execution within a tight timeframe and in-line with the recommendations set out in the Guide for Conducting the Mid-Term Review of GEF-Funded Projects.

### *Methods for the Collection of Information.*

The MTR methodology combines qualitative (including interviews and a focus group) and quantitative methods (data collection, processing, analysis, and presentation of information), which enabled the evaluators to draw conclusions across the subject areas mentioned above. The different techniques for collecting and analyzing information as follows:

**Document (Desktop) Review:** The main documents were provided by CI-Guyana and were analyzed from different perspectives, such as, the quality and relevance to the project design, identification of gaps, coherence to national programs, correlation between documents, etc. The documents were reviewed in January 2021. The process continued throughout the months of February and March and included secondary sources, online information, and industry resources. See the [List of Sources](#) consulted (Annex VII).

**Interviews:** Key informants from partner organizations, authorities, heads of public institutions, local authorities, project managers; were interviewed in a 40-to-60-minute interview based on the relevance of the stakeholder and the potential amount of information offered. A [Semi-structured Interview Guide](#) (See Annex III) was produced to facilitate semi-structured interviews appropriate for a wide range of stakeholders. The notes from interviews were processed according to the criteria.

**Focal Groups:** Focus groups were originally considered. Due to travel restrictions, these have been temporarily placed on-hold in favor of more Semi-structured Interviews. Through the interviews, the evaluators will ascertain the need for a targeted focus group to either inform or as a triangulation mechanism or to validate information received or recommendations. Presently, as can be seen in Annex 2 of the [Draft Agenda](#), the focus groups were held specifically with CI management Unit as well as the project's Supervisory Board. Another opportunity presented itself during the evaluation. Between February 17 and 19, a Financing Roundtable to support the development of a Financial Mechanism. The roundtable effectively had all key stakeholders present during the event and was an opportunity to listen to the interactions and comments made by the participants. Evaluators, during an interview with CIRDI arranged to audit the event and the working groups. CIRDI graciously shared the key questions and topics to be discussed enabling the evaluators to square the event with the Semi-structured Interview Guide and treat the event as a *de facto* focus group. When the activities broke for the day, evaluators were able to reach hard-to-reach miners present at the event.

**Debriefing and validation workshops:** Because of COVID, no mission to Guyana was permitted. Hence, no mission debriefing took place.

**Processing and systematization** of all the information collected and analyzed. The synthesis on the one hand and the deepening on the other of all the information that the evaluator will accumulate through the different instruments, will be ordered in structured and standardized documents previously prepared (Excel matrix), organized based on the evaluation questions by criteria, considering also the logical order of presentation of the information referred to in the annotated index of the final report (which will be adjusted and/or expanded).

**Triangulation techniques** were used to cross-reference observations, fact-check, and arrive at the accurate interpretation of events to facilitate assessment and arrive at findings. To this end, the results of the analyses will be verified through multiple sources and methods.

Presentation of Findings: At the end of the online interviews, a feedback loop is planned with CI and the Reference Group to validate the preliminary findings of the assessment.

**A Virtual Presentation of Initial Findings** touches off a feedback loop beginning with a presentation for the delivery of findings for CI-GEF staff on 7 April 2021 and a subsequent conversation was delivered for CI Guyana staff on 14 April. Debriefing was organized for the CI-GEF and project staff at the end of the process in the form of a Presentation of initial Findings.

### *Informants sample selection*

Quality informants were identified and submitted to the evaluation team by the CI Guyana's Project Management Unit in Georgetown together with the advice of CI Headquarters. "Quality" refers to the quality of the role of the person or group to be interviewed in relation to the project and their representativeness. Without travel authorization, it was a formidable task to interview enough and diverse participants to adequately triangulate information. For that reason, the selection of participants is critical to both the effectiveness of the evaluation but also to the efficiency. Evaluators also sought sources outside of the submitted list to query content experts and validate opinions generated on-the-ground in Guyana. To this list, evaluators added equipment suppliers, geologists, and mining engineers with experience in the regions indicated.

The implemented agenda is outlined in Annex V and the [List of Stakeholders](#) interviewed is presented in Annex VI of this report.

### II.4 Limitation of Methodology

The "evaluability" is the means by which a program can be evaluated feasibly. This implies availability and coherence of data, reports, and access to qualified stakeholders who are willing to participate. The information obtained should be from quality sources<sup>16</sup>. In addition, there should be favorable conditions to conducting the field work, access to sites, permits, and a safe working environment. Evaluability refers to the **quality of the results framework** with access to supporting documents from the project design phase on results, products, and indicators. Ideally, full access to the project's monitoring and evaluation specialist should be granted and a monitoring system with an acceptable level of functionality.

The project was deemed evaluable at the time of contract with an understanding of the **limitations imposed** by the COVID pandemic. CI's safety protocol did not permit the authorization of travel to Guyana nor to the regions. AAE attempted to implement the methodology described above through a virtual process. Although Guyana's communications system is basically good. Many persons were working from their homes and did not have the bandwidth necessary for video conferencing. At times the communications were garbled, or the participants could not log-on, or phone batteries ran down at critical times. On several occasions, the evaluators had to reschedule failed interviews. To mitigate the situation, Spiral Consulting, an AAE partner in the evaluation provided a local evaluator with process engineering and environmental protection credentials to provide local contacts and to provide in-person interviews in the event of relaxing restrictions for Guyanese citizens. CI Guyana responded to

---

<sup>16</sup> OCDE/CAD: 2002-2009

all information requests with good and up-to-date information and worked hard to assist the evaluation team with ever-changing schedules.

Despite these limitations, AAE was able to execute the agenda and adequately evaluate the evaluation but with a much heavier time footprint. The adage, “seeing is believing” is still important for evaluators and from COVID, we learn that the time and effort required of a virtual process is greater than an in-person situation.

### III. Project Description and Background Context

#### III.1 Development Context

The approved project document<sup>17</sup> provides a description of the development context of the project summarized<sup>18</sup> as follows:

Guyana’s Artisanal, Small- and Medium-scale Gold Mining (ASGM) sector has been in existence for over one hundred years. [Unlike many countries with ASGM] The ASGM sector has legal status in Guyana under the 1989 Mining Act that legalizes mining activities, scale (small, medium, or large) based on the size of the dredging equipment and technology used. Artisanal miners are legal once they have registered and paid for mining claims.

Gold plays a central role in the economy, accounting for 15 percent of GDP, 78 percent of the value of mineral production, and 24 percent of exports<sup>19</sup>. Legally declared gold generated approximately 64 percent of all the country’s foreign exchange. Gold production is growing. From 2007 to 2016, production increased by 13 percent per annum. [Between] 2014 and 2015, gold production was 459,004 and 495,000 ounces respectively increasing to 712,707 ounces in 2016, a 44 percent increase over 2015<sup>20</sup>. Gold production remained at around 712,706 ounces in 2017 and increased to 736,000 ounces in 2018<sup>21</sup> (Jordan, 2017). The ASGM sector accounts for 70 percent of the country’s gold production.

The ASGM sector has extensive backward and forward linkages to the retail and service sectors. It is the main source of employment and revenue for hinterland communities, indigenous communities and directly employs over 18,000 persons<sup>22</sup> including youth that would otherwise face unemployment. Guyana’s long-established jewelry sector encompasses approximately 273 artisanal and seven major gold jewelry manufacturing enterprises whose product is highly sought-after throughout the Caribbean.

---

<sup>17</sup> GEF-Conservation International; A GEF GOLD/Supply Chain Approach to Eliminating Mercury in Guyana’s ASGM Sector: El Dorado Gold Jewelry – Made in Guyana; Project Document endorsed by CEO, 2018.04.17.

<sup>18</sup> [Brackets] indicate text added by the author to enhance context. Sections have been reorganized for clarity

<sup>19</sup> Ministry of Natural Resources and the Environment, 2015

<sup>20</sup> Bureau of Statistics, 2017

<sup>21</sup> Update this figure and state the total incremental increase to simplify.

<sup>22</sup> Draft National Action Plan for the Minamata Convention, 2016)

### III.1.1. The Environmental Context

Although gold mining has traditionally been dominated by men, women do participate, and their role is evolving. Significant numbers of women currently own mining operations while others work directly in mining operations, provide support services such as cooking and laundry and as vendors of various products in shops close to the mining operations. The Guyana Women Miners Organization (GWMO) estimates that there are 14 women miners in Region 9, 32 in Region 8, and 21 in Region 1; the regions where this project is being implemented. Many women also serve.

Mining is the largest consumer of mercury and accounts for 94 percent of Hg emissions (Ministry of Natural Resources, 2017). Between 2008 and 2010, an estimated 60,000 kg of mercury was imported annually. More recent data suggests a steep decline in reported imports, with only 5,313 kg and 25,480 kg of mercury being imported for 2014 and 2015, respectively.

Studies conducted in the PPG phase have shown that approximately 89 percent of the owners of mining operations use mercury at some stage. Approximately 91 percent of this group use mercury in the final stage of the gold extraction process, i.e., in amalgamation; approximately 20 percent use mercury at the separation stage in the sluice box; and approximately 12 percent use mercury in the open mining pits.

Gold mining releases mercury in two forms: a mercury vapor released during roasting, and a metallic form released during amalgamation. As a toxic, non-biodegradable element, mercury poses a serious threat to ecosystems. The effects of pollution may be even more profound in Guyana's tropical rainforests, as growing evidence suggests that the higher organic matter, temperatures, and biological activity in rainforests increase the rate of conversion to methylmercury (mercury's more toxic form).

Negative impacts of mercury pollution include a) negative hormonal, reproductive, and behavioral alterations in mammals (mercury is a neurotoxin to mammals); b) root damage in plants; c) negative impacts to avian breeding such as fewer laid eggs and increased embryo death; and d) changes to the soil microbial community, which leads to slower primary production. Along with these effects, the movement of mercury-contaminated water is an international concern. Since mercury is not biodegradable, mercury contamination remains long after mining ceases (Veening, Bulthuis, Burbidge, & Strupat, 2015). In Guyana, the three (3) main groups of mercury release sources are: primary metal production (excluding gold production by amalgamation) 15,357 Kg Hg/y (54 percent); gold extraction with mercury amalgamation 11,777 Kg Hg/y (41 percent); and use and disposal of other products 1,499 Kg Hg/y (5 percent) (Ministry of Natural Resources, 2016).

Mining is the biggest driver of deforestation, presenting a real challenge to Guyana's status as a high forest cover, low deforestation rate country, and to its global climate commitment. The main environmental impacts of the ASGM sector in Guyana are deforestation, mercury contamination, land degradation, and habitat destruction. Since 2008, when gold prices increased in response to the global economic crisis of 2008, close to one hundred jaguars were killed due to conflict with miners (Dell'Amore, 2015).

The subsequent deforestation causes erosion and changes in soil quality in the mining areas, which negatively impacts forest regeneration. The discharges from hydraulic mining operations also cause turbidity and siltation downstream of the mined sites, significantly affecting fish for human consumption and the domestic water supply of the hinterland communities. Additionally, this physical disturbance alters river channels and creates stagnant pools that

become breeding places for malaria and other mosquito-borne diseases, including yellow fever and dengue, which endanger the health of local populations. The continued expansion of the extractive sector and increasing demand for land and forests puts pressures on the rich, intact ecosystems in Guyana, and indeed on the entire Amazonia ecoregion, threatening to compromise the services provided by its ecosystems and biodiversity, and, by extension, threatening the well-being of its people.

### III.1.2. Development Context

Guyana has undertaken several initiatives to address environmental problems stemming from gold mining. Despite the effort, and important contributions from various bilateral and multilateral development agencies, Guyana's progress to reduce mercury use has been limited. A stated policy by the GoG under a previous administration to offer financing to miners for mercury-free technology, called the Mercury-Free Mining Development Fund (MF MDF), was never fully established, and therefore remains non-subscribed.

### III.1.3 Barriers to Addressing Global Environmental Problems and Root Causes

Some mercury-free technologies (Appendix IX) have demonstrated recovery rates of 65 percent when comparing the gold assay in the ore body versus the gold recovery<sup>23</sup>. While many miners have expressed an interest in non-mercury processing technology, they state a lack of information, capital, and incentives<sup>24</sup> as hindrances.

Other barriers (regrouped by Evaluators) include:

Financial:

- Few incentives or disincentives to improve gold mining practices. Private-led ad hoc credit (hire-purchase) arrangements include no performance guidelines other than meeting loan repayments.
- Some mercury-free equipment is more expensive than the technologies currently in use, hence capital financing is sometimes a barrier.
- Startup costs to introduce the new technologies are high compared to business as usual. This relates not only to high financial outlays for retooling, but also the downtime in actual gold extraction as the equipment is optimized, and for training.
- The education and outreach programmes that have been carried out have not sufficiently captured the role profit motivation plays in the industry, or the impact on livelihoods and family life of the current practices in the industry.
- Few if any markets/buyers (including the GoG) differentiate between mercury-free and traditionally produced gold. Undifferentiated pricing, when combined with limited awareness, acts as a disincentive to miners to change from business-as-usual mining to mercury-free technologies.

Technical:

- Applicability of the technology in the various geophysical conditions of Guyana's gold-mining areas was never fully tested.

---

<sup>23</sup> Guyana Gold and Diamond Miners Association, 2017

<sup>24</sup> Ministry of Natural Resources, 2017



- Miners also have insufficient capacity to implement environmental regulations and codes of practice (Vieira, 2006).

#### Policy:

- Even with proper information sharing there is the more substantive issue of overlapping land uses. For example, in large areas, portions of lands are allocated and licensed for both forestry and mining. This means that neither the miner nor the forester can act independently to responsibly operate their concessions in keeping with their permits.

#### Institutional

- There is limited sharing of information and a silo approach to decision-making, leading to limited inter-agency consultations and strong resistance to institutional change for global environmental objectives.
- There is also a lack of monitoring of mercury trading and direct use in the mining sector, though there is limited monitoring of importation into the country by the GGMC and the Pesticides and Toxic Chemicals Control Board (PTCCB).

#### Capacity

- Enforcement and compliance are limited. Guyana has insufficient personnel or institutional capacity to monitor and enforce the regulatory framework and reduce the impacts of mining. Though the MNR has recently formed a Compliance Division its small core team requires urgent and immediate institutional strengthening to meet the policy direction of the MNR in monitoring, mediation, and enforcement.
- Along with capacity issues, there are legislative issues; for example, the GGMC does not have the authority to monitor activities of jewelers and other mercury-users (Ministry of Natural Resources, 2017).

### III.2 Project Strategy

The approved project document presents an alternative to the baseline situation that will assist Guyana to fulfill commitments to the Minamata Convention dedicated to eradicating the use of Mercury in gold production in Guyana. The internal logic of the project design has an objective that puts the Minamata commitment at its center. The strategy encompasses 6 components with 6 Outcomes and 13 Outputs.

The project objective is, *“to assist Guyana with converting to mercury-free mining by 2025 by directly involving business enterprises with a profit motive in leading the shift in the development of a mercury-free ASGM supply chain and downstream El Dorado Gold brand jewelry.”*

To achieve this objective, the El Dorado project foresees the following intermediate results:

1. Demonstrations established and mercury-free technology transferred.
2. A financial mechanism for capital investments for mercury-free technologies is established and functioning.
3. A chain of custody process, verification mechanism for gold, and an El Dorado Gold branding scheme is developed and institutionalized.
4. A national policy on responsible gold production and requisite laws/regulations refined/drafted to support a responsible gold commodity chain.

5. Regular monitoring of project activities against targets and outcomes and management of risk will be done and reported on semi-annually against the Results Framework. Adaptations will be made based on monitoring reports.
6. Strategic communications plan aimed at stakeholders, including miners, decision makers, and other actors within the supply chain, for awareness raising and policy advocacy developed and implemented.

The Logical Framework presented in the approved project document is presented in the next section. The PMU commissioned a review of the Monitoring and Evaluation Framework. The findings and recommendations of that process leading to a Revised Project Results Framework are further developed in the following section. The [Annex IX: Revised Project Results Framework](#) is provided in Annex IX.

## III.2 Project Results Framework

A revised Results Framework was approved by CI-GEF. See [Annex IX: Revised Project Results Framework](#)

**Table 3: Project Results Framework, GEF Endorsed**

<b>Objective:</b>	To assist Guyana with converting to mercury-free mining by 2025 by directly involving business enterprises with a profit motive for leading the shift in the development of a mercury-free ASGM supply chain and downstream El Dorado brand jewelry.		
<b>Indicator(s):</b>	<ul style="list-style-type: none"> <li>a. Number of tons of Mercury reduced by end of project.</li> <li>b. Number of Regions in Guyana in which mercury-free technologies have replaced the use of mercury in ASGM.</li> <li>c. Number of financial mechanisms established and operational to facilitate the transition of mercury-free technologies in ASGM.</li> <li>d. Number of Chain-of-Custody processes, verification mechanisms for gold, and El Dorado Branding Schemes developed and institutionalized.</li> <li>e. Number of national polices and requisite laws/regulations in support of responsible gold production and value added in the gold commodity chain refined/drafted.</li> </ul>		
Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
<b>Component 1: Appropriate mercury-free technologies mainstreamed in Guyana's ASGM sector</b>			
<p><b>Outcome 1.:</b> By the end of the project, demonstrations established, and mercury-free technology transferred.</p> <p><b>Indicator 1.1:</b> Number of regions in Guyana where mercury-free technology has replaced the use of mercury in the ASGM sector.</p> <p><b>Indicator 1.2:</b> Number of tons of Mercury reduced</p>	<p>1.No mercury-free technology in use in the ASGM sector in the country.</p> <p>2. 35.92 metric tons of mercury being used (based on a mercury flow approach estimate)</p>	<p>1. Mercury-free technologies have replaced the use of mercury in at least one region of Guyana.</p> <p>2. Reduction in mercury use of about 15 metric tons</p>	<p><b>Output 1.1.:</b> Two sites for demonstrating mercury-free practices and technologies are established and functional.</p> <p><b>Indicator 1.1.1:</b> Number of sites demonstrating mercury-free practices and technologies established and functional.</p> <p><b>Target 1.1.1:</b> Two (2) sites demonstrating mercury-free practices and technologies.</p> <p><b>Output 1.2.:</b> Mercury-free gold is produced from one Region.</p> <p><b>Indicator 1.2.1:</b> Number of landscape management plans developed to manage natural resources and catalyze mercury-free gold mining prepared</p>

Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
			<p><b>Target 1.2.1:</b> Three (3) landscape management plans developed; one for each project site.</p> <p><b>Output.1.3.:</b> Mercury-free gold mining practices and technologies transferred to miners in Region 9, and mining operations in Region 8 are exposed to these practices and technologies.</p> <p><b>Indicator 1.3.1:</b> Number of mercury-free gold mining technologies identified, tested and adopted.</p> <p><b>Target 1.3.1:</b> At least four (4) mercury-free technologies tested in field conditions.</p> <p><b>Indicator 1.3.2:</b> Number of Technology Innovation Clinics organized with miners, fabricators, and equipment retailers to test and select suitable equipment for two sites.</p> <p><b>Target 1.3.2:</b> At least six (6) Technology Innovation Clinics organized with miners, fabricators, and equipment retailers to test and select suitable equipment for two sites.</p> <p><b>Indicator 1.3.3:</b> Number of improved and tested centralized processing facilities to determine the feasibility of mercury-free technologies.</p> <p><b>Target 1.3.3:</b> One (1) centralized processing facility improved and tested</p>
<b>Component 2: Mechanism for financing capital investments for Mercury-free technologies established and functional</b>			
<p><b>Outcome 2.:</b> By the end of the project, a financial mechanism for capital investments for mercury-free</p>	<p>Zero (0) long-term financing mechanisms for mercury-free</p>	<p>A financial mechanism to facilitate the transition of</p>	<p><b>Output 2.1.:</b> An assessment of financing mechanisms for artisanal, small-scale, and medium-scale miners to adopt mercury-free technologies is undertaken.</p>

Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
<p>technologies is established and functioning.</p> <p><b>Indicator 2.1:</b> Number of financial mechanisms established and operational to facilitate the transition of mercury-free technologies in ASGM.</p>	<p>technology established.</p>	<p>mercury-free technologies will be established and operational.</p>	<p><b>Indicator 2.1.1:</b> Number of feasibility assessments completed on mechanisms for financing technologies appropriate to Guyana based on mechanisms tested around the world.</p> <p><b>Target 2.1.1:</b> One (1) feasibility assessment completed on mechanisms for financing technologies appropriate for Guyana.</p> <p><b>Output 2.2.:</b> A financial mechanism for the procurement of mercury-free gold mining technology is established and functional.</p> <p><b>Indicator 2.2.1:</b> Number of long-term financing mechanisms for mercury-free technology established and functional to access credit and financing for producers in model sites to be able to convert to non-mercury technology.</p> <p><b>Target 2.2.1:</b> One long-term financing mechanism for mercury-free technology established and functional.</p>
<b>Component 3: Markets established for branded mercury-free gold from Guyana</b>			
<p><b>Outcome 3.:</b> By the end of the project, a chain of custody process, verification mechanism for gold and, an El Dorado branding scheme is developed and institutionalized.</p> <p><b>Indicator 3.1:</b> Number of custody chains processes, verification mechanisms</p>	<p>Zero (0) chain of custody process verification mechanism and an El Dorado Green Gold Branding Scheme.</p>	<p>The branding of El Dorado Gold has been shown to result in increased gold sales and revenues to artisanal and small-scale miners in Guyana.</p>	<p><b>Output 3.1.:</b> Social and environmental standards, a chain of custody process, and a verification mechanism for El Dorado Gold, linked to the GEF Gold brand, is developed and institutionalized.</p> <p><b>Indicator 3.1.1:</b> Number of chains of custody process verification mechanism for gold produced on model sites developed and an El Dorado Green Gold branding scheme developed that is linked to the GEF GOLD Brand.</p>

Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
for gold, and El Dorado branding schemes developed and institutionalized.			<p><b>Target 3.1.1:</b> One (1) chain of custody process verification mechanism and an El Dorado Green Gold branding scheme.</p> <p><b>Output 3.2:</b> El Dorado producers are linked to international responsibly produced gold markets</p> <p><b>Indicator 3.2.1:</b> Number of market systems analyses and feasibility studies for the establishment an institutional mechanism to trade El Dorado-branded gold.</p> <p><b>Target 3.2.1:</b> One (1) market systems analysis and feasibility study for an institutional mechanism.</p>
<b>Component 4: National policies and incentives for mercury- free gold established</b>			
<p><b>Outcome 4.:</b> By the end of the project, a national policy on responsible gold production and value added and requisite laws/regulations are refined/drafted to support a responsible gold commodity chain.</p> <p><b>Indicator 4.1:</b> Number of national polices and requisite laws/regulations in support of responsible gold production and value added in the</p>	Zero (0) national policy on responsible gold production and value added along the gold commodity chain.	At least one (1) national policy and attendant requisite laws/regulations in support of responsible gold production and value added in the gold commodity chain revised/drafted.	<p><b>Output 4.1.:</b> Multi-stakeholder fora convened to provide input for the revision/drafting of a national policy for responsible ASGM gold mining and capacity built to ensure compliance with mining policy.</p> <p><b>Indicator 4.1.1:</b> Percentage of staff in the Compliance Division of the MNR whose capacity in integrated natural resource management has been increased and are able to contribute to policy creation and implementation.</p> <p><b>Target 4.1.1:</b> Seventy-five (75) percent of the Compliance Division of the MNR has increased capacity in natural resource management, and are able to contribute to policy creation and implementation.</p>

Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
gold commodity chain refined/drafted.			<p><b>Indicator 4.1.2:</b> Number of multi-stakeholder coordination mechanism to provide policy and programme advisory services for the long-term adoption of mercury-free gold mining technologies established.</p> <p><b>Target 4.1.2:</b> One (1) multi-stakeholder coordination mechanism for long-term adoption of mercury-free gold mining technologies.</p> <p><b>Indicator 4.1.3:</b> Number of national policies for responsible ASGM gold mining revised/drafted.</p> <p><b>Target 4.1.3:</b> One (1) national policy for responsible ASGM gold mining revised/drafted.</p>
<b>Component 5: Monitoring and Evaluation</b>			
<p><b>Outcome 5.:</b> By the end of the project, regular monitoring of project activities against targets and outcomes and management of risk will be done and reported on semi-annually against the Results Framework. Adaptations will be made based on monitoring reports.</p> <p><b>Indicator 5.1:</b> Number of monitoring and evaluation reports on targets and</p>	Zero (0) M&E programme for instituting mercury-free gold mining.	Monitoring and evaluation of the use of mercury in gold mining is institutionalized within the appropriate agencies.	<p><b>Output 5.1.:</b> A monitoring and evaluation programme for adaptive collaborative management for instituting mercury free mining instituted.</p> <p><b>Indicator 5.1.1:</b> Number of M&amp;E programme for instituting mercury- free gold mining established.</p> <p><b>Target 5.1.1:</b> One (1) M&amp;E programme for instituting mercury- free gold mining.</p>

Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
outcomes in the Results Framework completed.			
<b>Component 6: Communications and Knowledge Management</b>			
<p><b>Outcome 6.:</b> A strategic communication plan and materials targeting key stakeholders, including miners, decision makers, and other local and international actors within the supply chain for awareness raising and policy advocacy are developed and implemented.</p> <p><b>Indicator 6.1:</b> Number of strategic communication plans and materials (e.g. policy papers, factsheets, videos, etc.) aimed at key stakeholders, including miners, decision-makers, and other actors within the supply chain for awareness raising and policy advocacy developed.</p>	<p>Zero (0) education and awareness plans targeted at policy makers, mining and indigenous communities, and other key stakeholders on responsible gold mining in Guyana.</p>	<p>Twenty (20) strategic plans and awareness materials targeted at policy makers, mining and indigenous communities, and other key stakeholders on responsible gold mining in Guyana.</p>	<p><b>Output 6.1.:</b> A strategic communication plan prepared and implemented, and materials prepared (e.g. policy papers, factsheets, videos) aimed at key stakeholders, including miners, decision-makers, and other local and international actors within the supply chain for awareness raising and policy advocacy.</p> <p><b>Indicator 6.1.1:</b> Number of strategic communications plans aimed at key stakeholders, within the ASGM supply chain for awareness raising, policy advocacy developed and implemented.</p> <p><b>Target 6.1.1:</b> One (1) strategic and communications plan aimed at key stakeholders, within the ASGM supply chain for awareness raising, policy advocacy developed and implemented.</p> <p><b>Output 6.2.:</b> Biennial conference and annual dialogues organized to promote Project Findings and Responsible Gold Mining.</p> <p><b>Indicator 6.2.1:</b> Number of education awareness material and activities to promote mercury- free gold mining technology nationally prepared and published.</p> <p><b>Target 6.2.1:</b> One (1) fully funded education awareness program to promote mercury-free gold mining technology.</p> <p><b>Output 6.3.:</b></p>



Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
			<p>Coordination with the global project on Knowledge Management activities.</p> <p><b>Indicator 6.3.1:</b> Number of documented lessons learned made available to the knowledge management platform within the UNEP Global Mercury Partnership.</p> <p><b>Target 6.3.1:</b> At least one (1) documented lessons learned made available to the knowledge management platform of the UN Environment Global Mercury Partnership.</p> <p><b>Output 6.4.:</b> Education and awareness on options and benefits of responsible gold production and education targeting policymakers to build national commitment to a sustainable responsible gold value chain in Guyana.</p> <p><b>Indicator 6.4.1:</b> Number of education and awareness plans targeting policymakers and mining communities on benefits of responsible gold production gold value chain in Guyana.</p> <p><b>Target 6.4.1:</b> One (1) fully funded education awareness plan targeting policymakers and mining communities builds commitments on benefits of responsible gold production gold value chain in Guyana</p>

### III.2.3 Theory of Change

The endorsed project document does not specify a TOC. As part of the development of the project's Monitoring and Evaluation Plan, Dejong<sup>25</sup> summarized the TOC for the El Dorado Gold project as follows:

***IF** awareness and knowledge of mercury's dangers and its alternatives is increased among Guyana's small-scale gold miners, **AND** if access to mercury-free technology is facilitated through financing and demonstrations, **AND** the enabling environment is enhanced through policy incentives and special branding around a mercury-free supply chain, **THEN** Guyana's small-scale gold mining sector can reduce its mercury use while still contributing to the national economy and local livelihoods.*

The theory presented does not fully encompass the variables and barriers expressed in the project context. Hence, adjustments in language to improve the linkage between the Project Context, TOC and Project Strategy are provided in Section IV.1.

**Figure 1: Internal Logic of the Project**



### III.3 Project Geography

The sites and area selection were based on a set of criteria derived from consultations with stakeholders during the Project Preparation Grant (PPG) phase, and after planning and

---

<sup>25</sup> Dejong, T. September, 2020. GEF-GOLD Monitoring and Evaluation Framework and Results Management Plan. p.6.

coordination under CI-Guyana's Responsible Mining Initiative (RMI), and with other key actors working in the sector.

Project activities were originally scheduled to be carried out in two Regions: (a) in Mahdia/Campbelltown and the Upper Potaro areas in Region 8 (), and (b) the Marudi Mountain area in Region 9. Additionally, Port Kaituma in Region 1 was selected as a control area and was intended to be used as a control to enable a comparison of areas with the intervention versus this area without the intervention. In 2018, following a government shutdown of mining activities in region 9 the Project Management Unit with Guyana Gold Mining Commission relocated the project's activities to region 7 where the overall conditions for installing a dedicated demonstration site were more favorable. Activities in region 1 were cancelled due to a significant COVID outbreak and because of a decision to not invest in a control group as this would proliferate environmentally unsound practices. This latter decision is discussed further within the findings for Component 1.

### III.2.5 Implementation Arrangements

The Executing Agency responsible for the project delivery is CI-Guyana, which is accountable to the CI-GEF Project Agency for the GEF funding it receives under the project. Other co-executing partners are the Guyana Gold and Diamond Miners Association (GGDMC) and the Guyana Geology and Mines Commission (GGMC) through a public-private partnership.

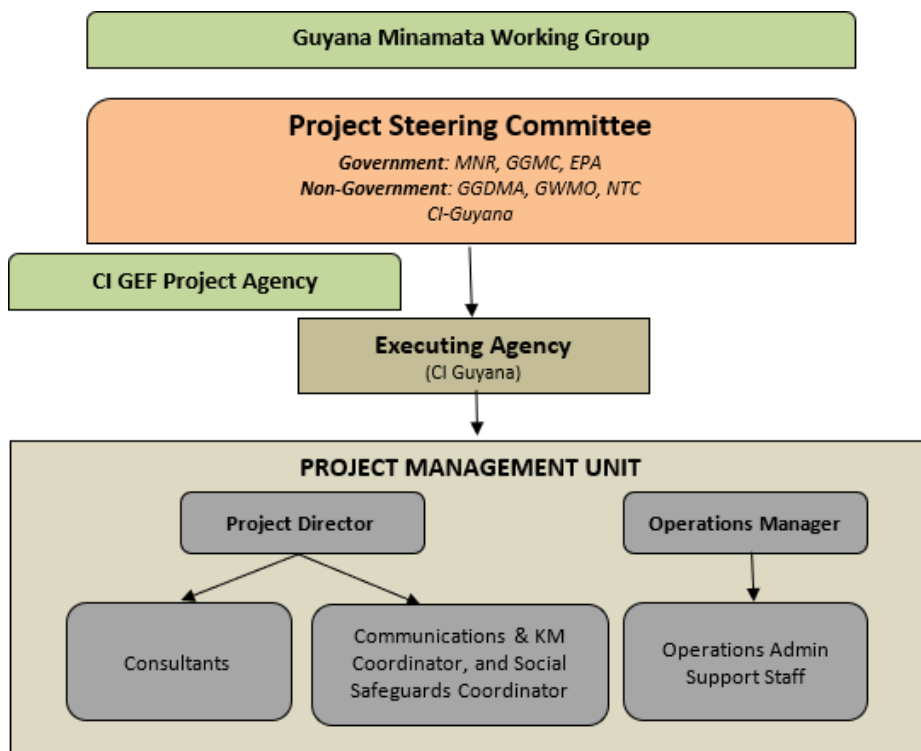
The organizational chart for the project (Figure 2) illustrates a 2-tiered structure. The upper-tier governing body is the Project Steering Committee (PSC) which provides oversight, advice, feedback, and supports CI-G in resolving any issues or conflicts that arise. The PSC assures to the EA and PMU for efficient and effective project implementation. Included in its role is the efficient and effective project implementation, consent, and leadership. The PSC reviews progress reports, approve programmatic modifications in the Annual Work Plans (AWP) per GEF and CI procedures. They also provide programmatic recommendations. This is a high-level committee that meets once a quarter, or extraordinarily in the case of emergencies. The PSC also aids in the resolution of grievances; communication; and high-level impact monitoring. The PSC is comprised of the following members:

- CI-Guyana: Executing Agency.
- GGMC: Executing Partner: executing partner in mining. The agency is critical to the formulation of a national policy and regulatory framework to support sustainably sourced gold. Additionally, the GGMC will be critical to this project due to its role in testing appropriate mercury-free technologies for Guyana's gold mining sector.
- Ministry of Natural Resources (MNR): GEF Operational Focal Point.
- Environmental Protection Agency (EPA) Executing partner in Monitoring and Evaluation and safeguards
- Guyana Women's Mining Organization (GWMO) is the largest women's mining organization with representation in all mining districts. The Organization's continued engagement with the project provides a better understanding of the realities facing men and women in the ASGM sector, how they are similarly and dissimilarly impacted by mercury, and their roles in effective management of mercury. Engaging with the GWMO

allows the project team to identify gaps and understand and prioritize gender analyses necessary for designing equitable measures related to mercury. Engagement with the GWMO also supports the EA’s legitimacy within the sector and ensures that gender dynamics are well understood and addressed.

- GGDMA represents miners from all mining districts. The Association a highly technical partner and The El Dorado Gold Project assists GGDMA to expand its membership to include smaller scale operations with less upfront capital to invest in better technologies.
- The National Toshias Council (NTC) comprises elected Indigenous leaders from across Guyana’s ten regions. The NTC’s engagement to ensures that the project represents their constituency’s critical interests. The relationship provides learning opportunities for NTC leadership and fosters a link between indigenous peoples and miners to create a more collaborative approach to resolving resource-based conflicts, promoting Guyana’s sustainable development agenda, and engendering shared understanding and support for improving national policy.

**Figure 2: Organizational Chart**



As figure 2 implies, the Minamata Working Group has an overarching role in the implementation of all projects geared towards reducing and phasing out of mercury use in all sectors and is chaired by the Permanent Secretary of the MNR. The Working Group ensures synergies and coordination in initiatives related to mercury phase out. During the evaluation, AAE was able to evaluate the functionality of different levels in the process.

CI-G maintains a dedicated Project Management Unit (PMU) responsible for management of the project technical, financial, and administrative functions and in monitoring the delivery of the project’s results in accordance with the Results Framework and others under the Grant Agreement. The PMU comprises the Project Director, the Operations Manager and supporting technical and administrative staff. The Project Director is responsible for the overall

implementation of the project components and reporting, and manages the coordinators and consultants hired by the project. The Operations Manager oversees the finances of the PMU, prepares financial reports to meet donor requirements, ensures that procurement guidelines are followed, and directs financial audits.

CI-Guyana also brings to the table a coordination role with the Responsible Mining Initiative (RMI,) an initiative co-financed by the Global Environmental Fund and the Norwegian Agency for Development Cooperation (NORAD), which engages the gold mining sector to increase adoption of improved practices, in order to reduce pressure on forests. GGDMA is collaborating in “Addressing the drivers of deforestation in Guyana and Peru” to address the role of mining in deforestation in Guyana, improve technologies, reduce pressures on forests, biodiversity, and ecosystems, and to establish financial and technical support mechanisms for small and medium scale miners.

#### IV. Findings and Recommendations

The findings of the MTR are presented in this section by category as introduced in Section II. The specific categories reported are:

- Project Design and Strategy
- Progress Towards Results
- Project Management
- Safeguards
- Stakeholder Participation
- Sustainability
- Risks
- Project Implementation and Adaptive Management

Each category presents the results of the evaluation from the standpoint of effectiveness using the established indicators, efficiency based on deployment of project funding, relevance, and coherence to national policies, among others.

Conclusions and recommendations are presented in each of the following sections. These are later extracted from the text and summarized in Section V. A [Annex XI. Summary Table of Findings, Conclusions, and Recommendations](#) is available in Annex XI.

##### IV.1 Project Justification

The underpinnings of the project were probed through a desk survey of the project and the interviews with key stakeholders.

The project justification is comprehensive in policy, social and environmental context but not necessarily complete. The environmental factors associated with the effects of the mercury use of the ASGM are clearly presented and well documented with respect to an understanding of the associated drivers and consequences to global benefits.

The policy landscape relating to mercury use and the ASGM sector is also well defined. Perhaps the most important policy aspect is the commitment of Guyana to the Minamata Convention. The small-scale mining sector contribution to the problem is also well documented. All government actors interviewed presented a unified message on the importance of the Convention and the commitment of the government to reach the Minamata objectives. Within that context, all were anxiously awaiting the results of the GEF financed enabling activity titled, *Development of National Action Plan for Artisanal and Small-Scale Gold Mining in the Co-operative Republic of Guyana* (GEF ID 10153) that will provide a clear policy direction for the country. This will be further discussed as a positive aspect relating to Component 4 of this project in addressing policy gaps.

During interviews, evaluators sought to understand the risk of a changing policy environment. Would the controls on illegal mining be relaxed to contribute to a recovering post COVID economy? All responders from both the public and private sectors felt that the commitment to the Minamata process would not be altered. Finally, a sample of the policies listed in the project document were reviewed for conformity of the project to the pertinent national policies, development plans, GEF Chemical and Waste focal area etc. Regulators were specifically queried on how the project responded to their institutional priorities as well as their national plans.

*Finding 1: (Relevance/Conformity) Clearly, all partners are gravitating towards the Minamata process, which presents an opportunity and a step forward in the policy landscape.*

*Finding 2: (Relevance/conformity) The project is in-line with the relevant national policies and priorities, the GEF Chemical and Waste Focal Area.*

In the social realm, the project context was also clearly presented. However, through interviews, the evaluators began to sense that important aspects of small-scale producers had been overlooked or underestimated. First, there is a great variation amongst small scale producers. Those at the subsistence level produce only to eat. Those who are luckier can improve their dwellings or have a reserve to avoid hunger. Larger producers may send their children to school. It appears that the poorest have a fluid market condition that enables them to freely buy and sell exceedingly small amounts of gold without paying royalties or taxes, which amount to 7-8%. It is not clear if the royalty or the ease of entry into the market is the driving factor. This is an aspect that greatly affects the actions of component 2. This is the alternate and competing proposal to the results framework and could be a powerful force in maintaining the *status quo*. It is also not known how much mercury they use because this is purchased in exceedingly small amounts.

*Finding 3: The socioeconomics that drive the decision-making process of the Artisan producer constitute a significant gap in the understanding of the economics of the status quo.*

*Finding 4: There is also a significant gap in the baseline understanding of their production process and is important in knowing how much mercury is avoided through mercury free production practices and will be discussed further in the discussion of Component 1 below.*

The project justification also explores a full suite of barriers. Those are justified by the literature but seemed to understate an especially important area of development: Trust.

The issue of trust surfaced in a surprising number of interviews. Briefly, trust is important on two levels: (a) institutionally and (b) in the mercury free technology. In the former case, there are several trust issues. Primarily, the mining sector in general does not trust environmental NGOs. Miners clearly see NGOs as antagonists and when engaging with them they are wary of being attacked. The trust issues were noticed in both the private sector and in government agencies dealing with mining. Secondly, for the small-scale producer, trust is everything. The Artisan producers are vulnerable to and fearful of robbery. To manage this problem, they are very secretive about their locations and, logically, they do not want to share the location of a productive ore body.

*Finding 5: All producers interviewed indicated that they are open to technology if they can see that it will work and save them money. They must see for themselves that it works and produces an acceptable yield before they accept it.*

A final issue has to do with the mobile lifestyle of the poorest miners or “pork-knockers.” These are highly mobile producers that process a superficial ore body quickly and move-on. Any proposal must be framed within that context.

The profitability of the operation for the ASG miner depends on many factors from the quality of the ore body to the capacity of the equipment to the ease of operation, efficiency in labor, and movement (break-down and set-up) across the ore body. It has been demonstrated from the PlanetGold experience that similar technologies can work in similar situations. Mining is however a very site-specific proposition. Taking all mining into account, investors understand that there is only a 1 in 1000 chance that any mine will be profitable. For that reason, the quality of the ore body is what drives investment. Throughout the project, that variable has not been defined for the targeted regions until grab samples taken by GGMC and the PMU in Region 7 demonstrated promising results. Likewise, it is an assumption that the technologies proposed will actually work and provide an efficient and sufficiently low cost means of processing non-mercury gold in each situation encountered in each region. In fact, it is a killer assumption that must prove true to realize the project objective. For that reason, the demo sites are enormously significant. As discussed in this document, the miners are open to the idea, but they want to see it in operation.

*Finding 6: It is an assumption that the available technology will produce an attractive outcome for ASGM producers within the socio-economic and technological variables that could surface in demo areas. It is a killer assumption: high impact; high likelihood with a high consequence to the long-term program to address Mercury in Guyana’s ecosystems. The demos will be critical to proving the applicability of the proposed technology given the characteristics of the ore body in regions 7 and 8 with validated yield information.*

In addition, the root causes presented after the PPG process appear to be oversimplified; heavy on regulation and understates others mentioned in PPG, such as, the ease of access to markets, financial obligations to sell to intermediaries or lenders, tax avoidance, corruption, etc.

## IV.2 Project Design and Strategy

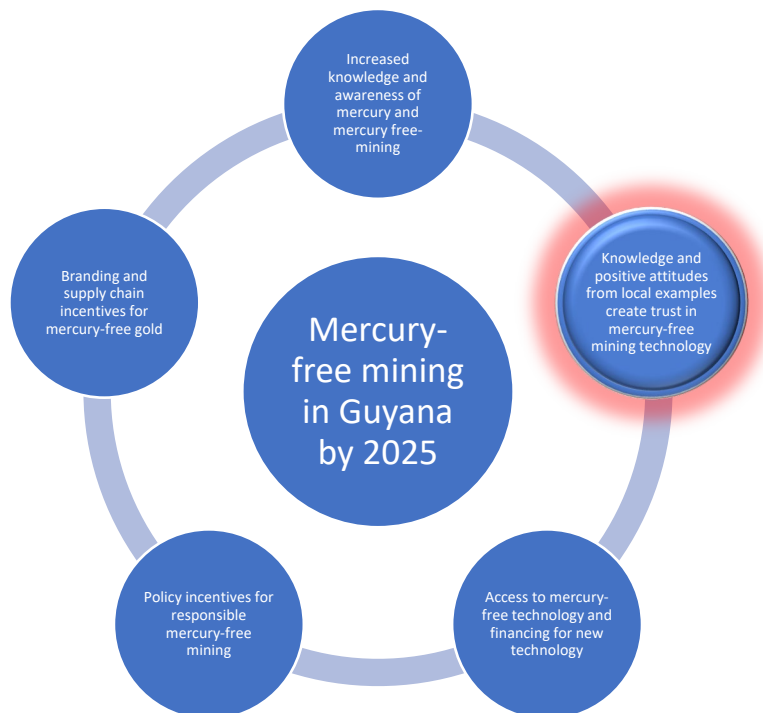
Theory of Change:

*Finding 7: The GEF Project Document did not have a Theory of Change. The TOC is important to align the project architecture to the project context. Essentially, it is the conceptual bridge between both. It is essential for the Minamata process and for Implementing Agencies to align all projects around a viable TOC.*

An important consultancy to develop the monitoring and evaluation plan for the project (Dejong, 2020) postulated on the TOC using the Results Framework as a reference to reconstruct a missing TOC. Based on the project context presented in the GEF approval documents. Dejong postulated:

***IF** awareness and knowledge of mercury’s dangers and its alternatives is increased among Guyana’s small-scale gold miners, **AND** if access to mercury-free technology is facilitated through financing and demonstrations, **AND** the enabling environment is enhanced through policy incentives and special branding around a mercury-free supply chain, **THEN** Guyana’s small-scale gold mining sector can reduce its mercury use while still contributing to the national economy and local livelihoods.*

**Figure 3: Suggested Modification to Theory of Change**



The TOC must incorporate the issue of trust because without it, market incentives might not matter because technology could be rejected. Developing trust will enable the project to move from knowledge to attitudes to practices. Hence, the project design incorporates Component 1:



*In situ* demonstrations of mercury free technology. If we focus on the intended result of technology adopted as an integral part of the Theory, AAE suggests the following composite:

***IF*** Miners accept Mercury free technology in their jurisdictions on a qualified ore body ***AND IF*** the technology produces a positive return as appreciated by the Artisan and Small-scale Miners ***AND IF*** access to mercury-free technology is facilitated through financing ***AND IF*** returns are increased through branding and a mercury-free supply chain, ***THEN*** Guyana's small-scale gold mining sector can reduce its mercury use while still contributing to the national economy and local livelihoods.

The original TOC is too heavily invested in the marketing aspects of the project as the driver of change. Marketing will provide an important incentive. The miners however have expressed several sentiments: (a) they are willing to try technology if they see that it works. They also see gold dust being wasted that they cannot capture. The focus of the technology aspect of the theory is to yield more gold is attractive to them.

The Project Design Architecture:

The evaluators consider that when the TOC is given clarity, the suite of components, outcomes and outputs will eventually contribute to the objective. Therefore, the project correctly embraces all the elements necessary to reduce the barriers over the long term. However, the fact that miners need to see the results for themselves before committing to anything makes component 1 the hub of the project from which all other components depart.

*Finding 8: The Results Framework is overly dependent on Component 1, which therefore becomes a pre-requisite for Components 2 (financing), 3 (Branding and marketing) and 5 (monitoring). This creates an internal risk. A failure in Component 1 becomes an obstacle to the success of the other components.*

In the case of Component 4, policies will not result simply from fora for the drafting of policies. A successful policy campaign requires public consent and therefore public education or information campaigns, successful lobby, site visits, etc.

With reference to Outcome 5 the project document states, "By the end of the project, regular monitoring of project activities against targets and outcomes and management of risk will be done and reported on semi-annually against the Results Framework." The focus is clearly on the monitoring of project activities. However, the output 5.1. states, "A monitoring and evaluation programme for adaptive collaborative management for instituting mercury free mining instituted." Clearly, the focus is on sector capacity and not on the project's management. The indicator and target confirm that supposition. Indicator 5.1.1: is, "number of M&E programme for instituting mercury- free gold mining established." The target is "One (1) M&E programme for instituting mercury- free gold mining." The output does not lead to the outcome.

Interviews with project staff and members of the steering committee clearly indicate that they are heading in the latter direction. Steering committee members admitted being confused at the onset of the project. CI-GEF correctly suggested a change in the language ( [Annex IX: Revised Project Results Framework](#) ) of the Outcome to the following:

*“By the end of the project, national capacity for the monitoring of the use of mercury in the gold mining established and strengthened.”*

In essence, the PMU is heading in that direction and the PMU is using the revised document. Although the confusion seems to be a thing of the past for the PMU and PSC, it was difficult for the evaluators to ascertain which language was being used. The decision to update the language to the text suggested by CI-GEF is supported by this evaluation.

**Table 4: Suggestions for improvement in the Project Results Framework**

<b>GEF Approved Text (Log Frame)</b>	<b>Recommended Change</b>	<b>Rationale</b>
<p>Indicator 1.2.1: Number of landscape management plans developed to manage natural resources and catalyze mercury-free gold mining prepared.</p> <p>Target: Three (3) landscape management plans developed; one for each project site.</p>	<p>Number of ounces of verified mercury-free gold produced at demonstration sites.</p> <p>[NUMBER IN WORDS] ([X]) ounces of verified mercury free gold produced at the project demonstration site.</p>	<p>The landscape management plans are part of the ecosystem recovery aspect. The recommended indicator indicates that the technology has been successfully deployed.</p> <p>Either add the recommended indicator as a new indicator or swap out the original output indicator 1.2.1. with the recommended one.</p>
	<p>Indicator 2.2.2. Number of miners applying to the financing mechanism to support their transition to Hg-free operations.</p> <p>Target: [Amount] of miners submitting applications to the financing mechanism established for procurement of new technologies.</p>	<p>Add an additional indicator to focus on effectiveness. or track the amount of money loaned. The amount loaned might extend beyond the boundaries of the project.</p>
<p>Indicator 4.1.1: Percentage of staff in the Compliance Division of the MNR whose capacity in integrated natural resource management has been increased and are able to contribute to policy creation and implementation.</p> <p>Target 4.1.1: Seventy-five (75) percent of the Compliance Division of the MNR has increased capacity in natural resource management, and are able to contribute to policy creation and implementation.</p>	<p>Indicator 4.1.1. Number of multi-stakeholder policy focused fora convened.</p> <p>Target 4.1.1: [NUMBER IN WORDS] ([X]) multi-stakeholder policy focused fora convened by project.</p>	<p>The original indicator will not measure a change that was fomented by the project. If you were to give a course on natural resources management focused on mining, then you could give a test to all employees to see how your course fits the policy realm.</p> <p>It is more effective to unite policy members around a cause and provide targeted information to them that could inform their decisions. the for a can be targeted to the results of the NAP process to make that more effective,</p>

		such as socialization workshops, etc.
Outcome 5.1 <i>By the end of the project, regular monitoring of project activities against targets and outcomes and management of risk will be done and reported on semi-annually against the Results Framework.</i>	Suggested: <i>By the end of the project, national capacity for the monitoring of the use of mercury in the gold mining established and strengthened.</i>	The singular output of Outcome 5 is, “A monitoring and evaluation programme for adaptive collaborative management for instituting mercury free mining instituted.” The output does not address the Outcome. The suggested language refocuses on the monitoring of Mercury in gold mining.

*Finding 9: Indicator 1.2.1 The Outcome 5.1 does not match the purpose and scope of its singular output 5.1.1. An adjustment in language is necessary (Irrelevant construction).*

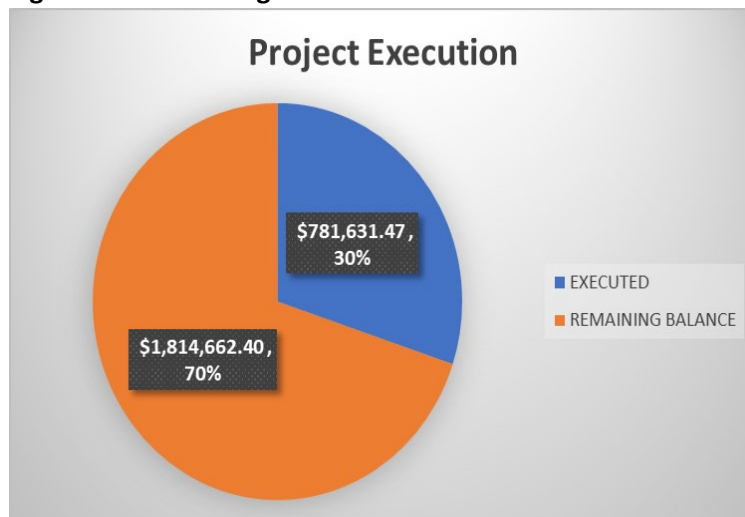
*Recommendation: ratify the changes as noted.*

#### IV.3 Progress Towards Results

The progress of the project to produce the desired results is the backbone of the project. Progress is presented first for the global project with notes on efficiency and effectiveness using budget execution as the basis for the delivery rate of project activities. The Traffic Light system is used for components 1-6 to illustrate progress towards the End-of-Project (EOP).

##### IV.3.1. Overall Progress Towards Results

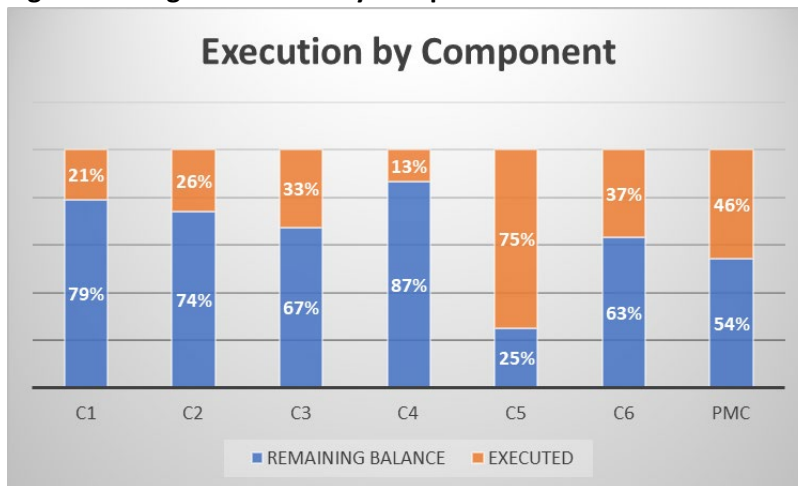
**Figure 4: Overall Progress**



The overall deployment of project assets to the end of the 2<sup>nd</sup> Quarter of Fiscal year 2021 were estimated at \$ 781,631 U.S. or 30% of the total project budget of \$2,596,293 U.S.

This does not include obligations, which are estimated at an additional 30%. Roughly 70% of the budget was obligated by the end of Q2 2021.

**Figure 5: Budget Execution by Component**



Component 1 is the most critical component to the project but has only 21% budget execution.

C5 is the least performing component with only 13% deployed.

These do not include contractual obligations on the books.

**Table 5: Total Project Execution:**

Approved Budget	Remaining Balance	Executed	
926,132	732,058	194,074	<b>C1</b>
412,531	305,372	107,159	<b>C2</b>
256,205	171,959	84,245	<b>C3</b>
160,546	138,918	21,628	<b>C4</b>
133,536	33,586	99,950	<b>C5</b>
561,768	354,072	207,696	<b>C6</b>
145,576	78,697	66,878	<b>PMC</b>
2,596,294	1,814,662	781,631	<b>TOTAL</b>

Data: Budget execution by component.

**Figure 6: GEF to Co-financing**

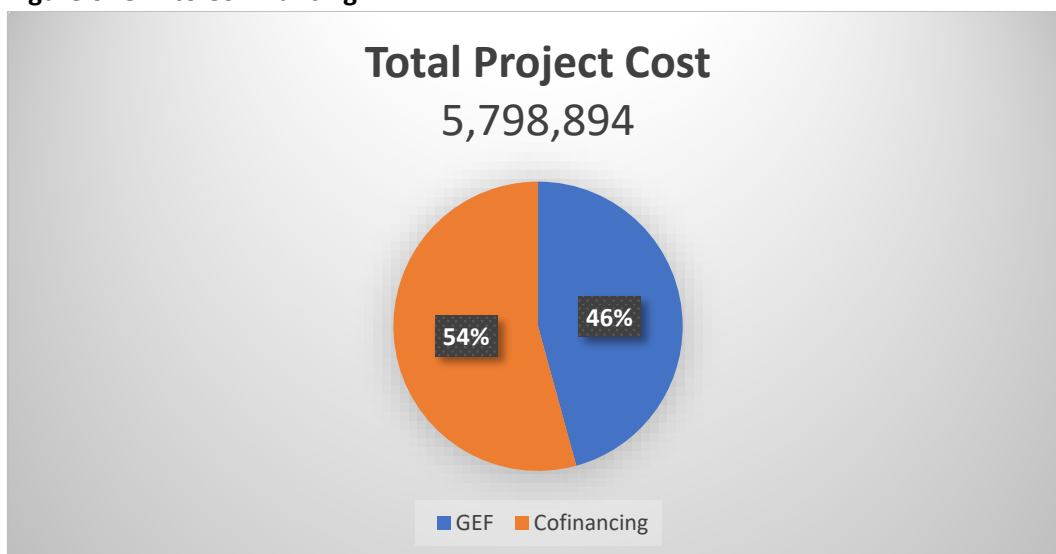


Figure 7: Total Financing by Institution

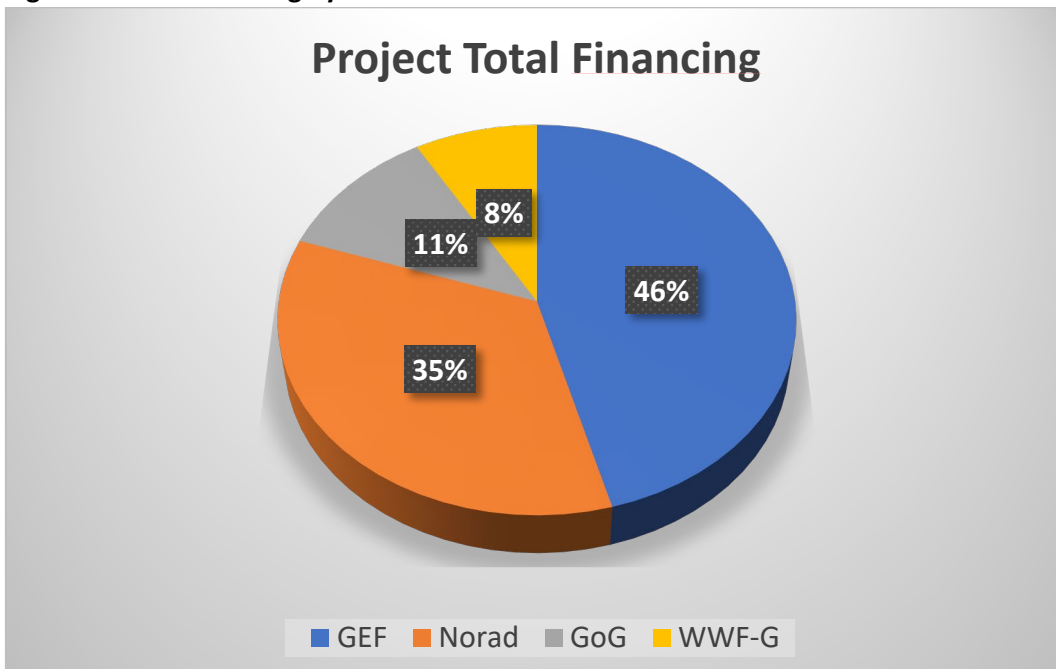
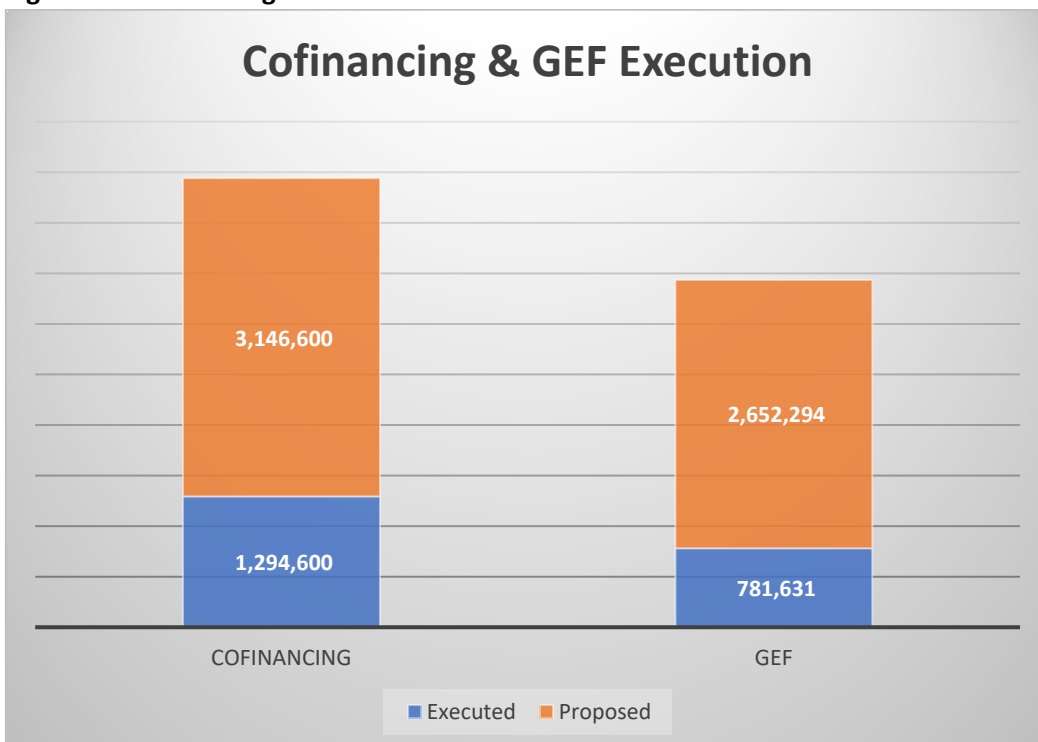


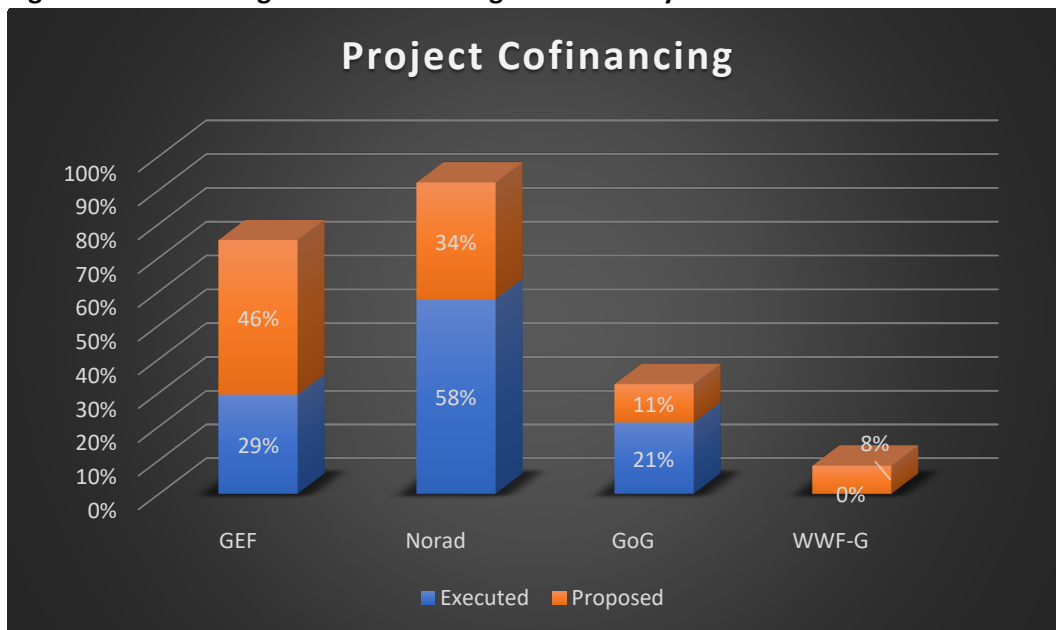
Figure 8: Co-financing Total Execution



**Table 6: Total Project Financing & Execution**

	Proposed	Executed	
GEF	2,652,294	781,631	29%
Norad	2,000,000	1,154,767	58%
GoG	659,600	139,833	21%
WWF-G	487,000	-	0%
Total	5,798,894	2,076,231	36%

**Figure 9: Co-financing Executed vs. Pledged Amount by Source**



The quarterly expenditures were examined to define the flow and efficiency of the budget and procurement process. We can also see the effects of COVID on project execution through the quarterly perspective. The following figures provide 2 perspectives. The first enables a visual presentation of the flow of work. The second uses a moving average of the cumulative totals per quarter:

**Figure 10: Quarterly budget execution**

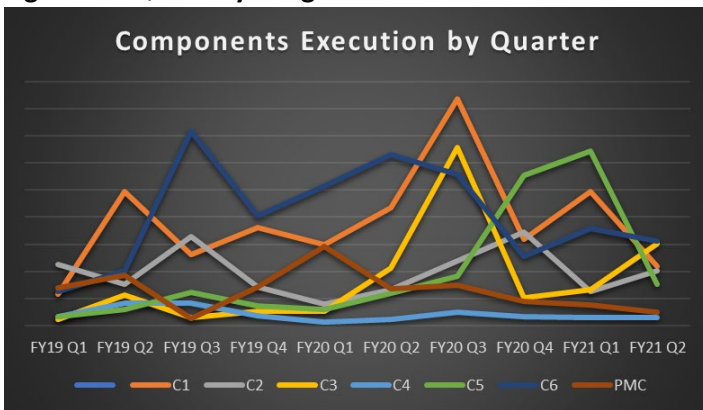


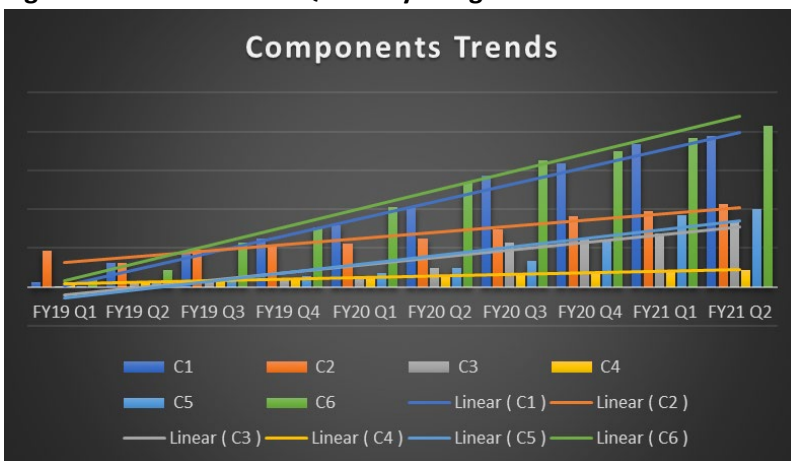
Figure 10 demonstrates that there was little consistency in planning for budget execution.

The project experienced a slow administrative start due to staffing issues, changes in management, amongst others. Execution of most components did not begin to expand until the end of Q2 of FY 2019.

Throughout 2019 there was erratic execution until FY 2020 when the execution modality really develops. This would be the result of procurement realized in Q4 of 2019. From that point forward, deployment of project assets continues at a healthy pace until the onset of COVID-19 at the beginning of Q4 2020. During this time, 2 components continue to develop, C1 (Demo establishment) and C5 (Monitoring and Evaluation) probably due to virtual work through geographic systems and coordination.

Figure 11 illustrates the general trend for budget execution by component. By using moving average, the evaluators can sense the overall dedication to executing the activities within the outputs.

**Figure 11: Accumulated Quarterly Budget Execution.**



A flat trend line such as C4 (yellow) demonstrates a consistent low-level of spending. This is typical of a dedicated staff with fixed costs. A trend line such as C6 indicates that the budget deployment increased consistently quarter over quarter. This usually indicates a healthy and progressive budget

execution scenario. When the slope of the line is very steep, it indicates a period of low performance with several quarters of accelerated performance towards the end of the project indicating a “catch-up” scenario or risky behavior.

**Table 7: Quarterly Budget Execution Data**

Execution by Reporting Periods (Quarters)	COVID IMPACTED?									
	FY19 Q1 Jul-Sept 2018	FY19 Q2 Oct-Dec 2018	FY19 Q3 Jan-Mar 2019	FY19 Q4 Apr-Jun 2019	FY20 Q1 Jul-Sept 2019	FY20 Q2 Oct-Dec 2019	FY20 Q3 Jan-Mar 2020	FY20 Q4 Apr-Jun 2020	FY21 Q1 Jul-Sept 2020	FY21 Q2 Oct-Dec 2020
C1	5,835	24,631	13,151	18,161	14,854	21,703	41,704	15,964	24,717	10,913
C2	11,218	7,635	16,445	7,153	4,031	6,702	11,922	17,228	6,401	10,148
C3	1,152	5,598	1,525	2,683	2,675	10,599	32,892	5,125	6,710	15,040
C4	1,682	4,132	4,197	1,907	638	1,254	2,546	1,700	1,596	1,479
C5	1,635	3,015	6,197	3,649	3,017	5,992	9,201	27,636	32,092	7,692
C6	6,301	10,065	35,888	20,257	25,640	31,476	27,851	12,796	17,954	15,633
PMC	6,953	9,271	1,397	7,072	14,556	6,806	7,487	4,516	3,902	2,491
TOTAL	34,777	64,346	78,798	60,882	65,410	84,534	133,602	84,964	93,372	63,396
	YR1				YR2				YR3	

Figure 12 illustrates the overall ranking of performance on the delivery of the outputs that contribute to the outcomes. An overall rating of “S,” or Satisfactory was given because the management team demonstrated their ability to keep moving forward despite 2 incredibly significant challenges: Political Change and lockdown due to COVID. Individual ratings for each Project Management and for each component are also in that range, except for Component 6 (Communication and Knowledge Management) which garnered a Highly Satisfactory or (HS) rating. Most importantly, the team seems to be on-track to complete all but 2 of the outputs.

**Figure 12: Overall Rating of Delivery on Components:**

Project Execution by Component		
Component 1: Appropriate mercury-free technologies mainstreamed in Guyana's ASGM sector		S
Component 2.: Mechanism for financing capital investments for mercury-free technologies established and functional		S
Component 3: Markets established for branded mercury-free gold from Guyana		S
Component 4: National policies and incentives for mercury-free gold established.		S
Component 5: Monitoring and Evaluation		S
Component 6: Communication and knowledge management	HS	
(HS) Highly Satisfactory   (MU) Moderately Unsatisfactory   (S) Satisfactory   (U) Unsatisfactory (MS) Moderately Satisfactory   (HU) Highly Unsatisfactory		
ON TARGET (will be completed)	LIKELY TO BE ACHIEVED	NOT LIKELY TO BE ACHIEVED



#### IV.3.2. Overall Ranking on Component 1 Delivery of Results MF Technologies in ASGM

As stated earlier, Component 1 is the center of the project. The Outcome is to achieve that at least 2 demonstrations of Mercury Free technology in ASGM are functioning and that these production units are verified through one of the mechanisms established in Component 3 as “non-mercury”.

The component got off to a slow and sometimes rocky start. Many of the trust issues referenced earlier surfaced. Early on, some of the key partners, such as GGDMA, began to question the technology and supported the project but mostly from a distance. Some issues that confronted the PMU were cultural in scope. Without dedicated miners on the staff, it was difficult for the PMU to be taken seriously by the mining organizations especially. CI-Guyana adapted and addressed this situation by hiring qualified and dedicated staff including a coordinator from the mining sector and several interns also from mining schools in Guyana. The addition of mining specialists jump-started a delayed process and increased credibility. Their response was rewarded as the trust barrier began to recede and agencies, syndicates and community groups of mining men and women began to comprehend that as an NGO, CI-Guyana was not interested in shutting them down.

Working towards the trust of the local miners is also a significant gap and a long-term process. The purpose of the demonstrations is to take the technology to the local mining sites and make it approachable. Early on, the PMU began to work with key government, private and civil society actors to identify appropriate mercury-free mining technologies and practices for further testing. Through this process, the project developed critical partnerships with the GGMC, the miners, and gold buyers who demonstrated interest in collaborating to implement testing and demonstration activities to promote mercury free technologies.

The project also collaborated with the Indigenous village of Campbelltown, Region 8 to complete a Village Improvement Plan (VIP) under the Ministry of Indigenous Peoples’ Affairs (MoIPA) Sustainable Village program. This plan includes the promotion of responsible - mercury free mining as a key priority and provides a valuable opportunity to establish a space for a mercury free landscape.

The project was clearly setting the platform towards achieving the establishment of demonstration sites, a key aspect of realizing output 1.1. A demonstration site was identified in partnership with an interested concessionaire but field activities to commence the preparation of the site were suspended due to COVID-19 and subsequent restrictions that are still in place. Mercury-free technologies will replace the use of mercury in the demonstration sites, once selected.

Demonstration sites had been identified in Mathews Ridge, Region 1 and in the Mahdia/Campbelltown area, Region 8. Gold buyers in Mahdia Town are also interested in partnering with the project to test and adopt mercury capture technologies in their shops.

The project established a relationship with a concession holder in Matthew’s Ridge, Region 1 and intended to sign an agreement in Q1/Y2 to begin demonstrations in that landscape and the Project commenced negotiations towards signing an agreement with the concessionaire who expressed interest in collaborating on the establishment of a demonstration site in Region 1.

The results of prospecting and environmental and social assessment activities are prerequisites to an agreement to be signed with the Concessionaire, so all arrangements were in-place to

conduct these activities. However, the onset of COVID-19 halted all field activities and travel into the mining areas. Therefore, the opportunity for the work with GGMC to establish a demonstration site in Region 1 and measure the mercury avoidance as a result of Mercury Free Mining technology project activities was delayed as well as the selection of demonstration sites in Region 7 and 8, due to restrictions related to COVID-19.

The GGMC remains committed to supporting the project with technical expertise and equipment, and several miners have indicated their willingness to participate in the demonstrations. The project held all arrangements in place to conduct the necessary activities as soon as restrictions are lifted. These activities partially resumed in Q2 2021.

Despite several advertised calls for Expressions of interest (EOI), there were no responses from suitable Concessionaires from Regions 7. One EOI was eventually received from Region 7 and from Region 8. Grab samples were conducted in both regions with promising results and that process is now under exploration. With positive results from exploration, it is highly likely that equipment needs can be determined with equipment being deployed and demonstrations online in the summer of 2021. There is still time to achieve the output 1.1.

**Figure 13: Component 1: Progress Towards Results**

<b>Component 1.: Appropriate mercury-free technologies mainstreamed in Guyana's ASGM sector</b>		<b>S</b>	
<b>Outcome 1: By the end of the project, demonstrations established, and mercury-free technology transferred</b>		<b>S</b>	
Output 1.1: Two sites demonstrating mercury-free technologies and techniques are established and functional		<b>S</b>	
Output 1.2: Verifiable mercury-free gold is produced from at least one demonstration site		<b>S</b>	
Output 1.3: Miners exposed to demonstrations of mercury-free gold mining practices and technologies in Regions (1), 7, and 8	<b>S</b>		
<b>ON TARGET (will be completed)</b>	<b>LIKELY TO BE ACHIEVED</b>	<b>NOT LIKELY TO BE ACHIEVED</b>	
(HS) Highly Satisfactory  (MU) Moderately Unsatisfactory  (S) Satisfactory  (U) Unsatisfactory (MS) Moderately Satisfactory  (HU) Highly Unsatisfactory			

The project is behind schedule in establishing the demonstration sites and starting the mercury-free activities with miners. This is due to several reasons.

- First, despite several advertised calls for Expressions of interest (EOI), there were no responses from suitable Concessionaires from Regions 7 and 8 for several months. One EOI was received from Region 7 towards the end of Q4, but the current restrictions have made it impossible to arrange the requisite preliminary visit to the area. It is expected that the use of a targeted approach is likely to also yield success in the identification of a demonstration site in Region 8.
- Second, the COVID-19 Pandemic imposed restrictions within the country to contain the virus that prevented the follow-up on the activities in the three intervention regions.

- Lastly, some field activities were scaled back in February 2020 to avoid conflicting with campaign events during the national and regional run-up elections on March 2, 2020. The country remained in political limbo until June 30, 2020.

The effect of these problems can be clearly seen in the budget execution for the period:

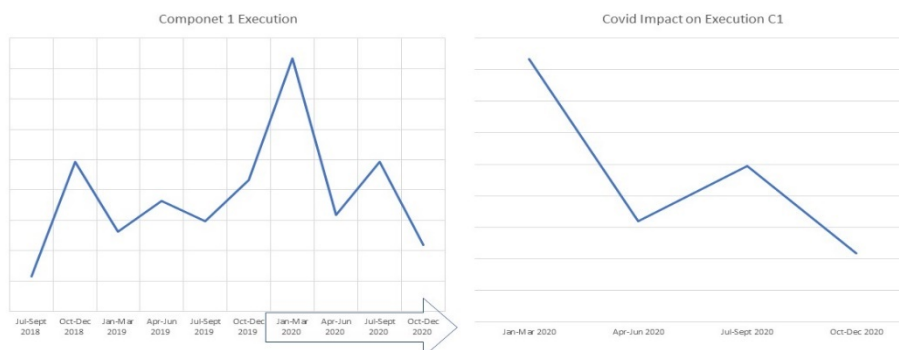
A score of “S” for Satisfactory was assigned because of the adaptation and consistent re-inventing to find solutions to the challenges faced. Notwithstanding a reinfection by COVID or derivative, it is likely that the team will achieve at least one full functioning demonstration.

The score of “S” also recognizes that through it all, the PMU and partners have consistently chipped-away at the trust issue. One important finding is:

*Finding 10: The multiple-stakeholder Round Table Discussions held by the Sector agencies and the PMU have been successful in engaging stakeholders and building trust.*

In fact, multiple private sector persons shared that they started taking CI-Guyana seriously after one of those events. These, when combined with CI’s participation in the NORAD funded initiatives have helped the executing agency position itself as a valuable partner in the process of ecosystem recovery from shocks related to ASGM and other partnerships.

**Figure 14: The effects of COVID-19 on Budget Execution**



## Covid Impact on Component 1

Figure 14 demonstrates the effects of the three mentioned problems of which COVID is the driver of limitations to work in the regions. Regardless, the project staff and GGMC remained active and focused on finding ways to move forward. Ultimately these were successful. During partial reopening, the team has now moved forward in Region 8 with 2 concessionaires and promising grab samples. They also have a potential site in region 7 identified.

As part of output 1.2. the PMU partnered with the Guyana Geology and Mines Commission (GGMC) to mobilize suitable mercury-free processing equipment and conduct mobile demonstrations at locations within project-focused Regions. These provided valuable information and learning that will strengthen capacities to ensure more effective field activities. One permanent demonstration site was identified in Region 1, but field activities to prepare the site for demonstrations were halted two days before commencement, due to the spread of COVID-19, and subsequent restrictions that are still in place.

To further strengthen national capacities and facilitate improved demonstrations of mercury-

free technologies and practices, a training program has been designed in partnership with Mercer University, Georgia, USA. The soon-to-be formalized partnership will produce a curriculum and associated protocols and provide hands-on training of trainers for GGMC, the Mining School, and other partners and help improve technologies to avoid mercury emissions from gold shops. Building this capacity within relevant national partners will help support the accelerated adoption of mercury-free mining technologies and sustained reduced mercury use within the ASGM sector.

There are some important lessons learned in this process.

- Primarily, the engagement with miners working in the three project-focused Regions indicates that across all three regions, miners were aware of mercury-free technologies but few owned or used them and even less had success with the new technologies.
- Miners also had a strong interest in learning about mercury-free mining technologies but were concerned about the cost.
- Miners interviewed during the MTR confirmed that their willingness, but they need to see it with their own eyes.

*Finding 11: With respect to Component 1, the time and effort for evaluating the ore body was significantly underestimated during the design phase.*

Even the ASG Miners suffer from the reality of the mining business, which are: (a) the quality of the ore body is everything and (b) acceptable ore bodies are extremely hard to find. For this reason, less than 1 mine in every 1000 attempts makes it into production. The time to set-up a demonstration site involves extensive sampling in remote areas. If a Grab Sample proves promising, then a deeper exploration phase begins. It is quite common that a promising initial sample turns out to be worthless in the exploration phase. If in a thorough exploration process, a sample proves promising, then the ore body is evaluated, and the appropriate equipment selected and deployed. However, for the ASG producer, the process is just beginning. Because margins are tight, it is important to test the equipment at the demonstration stage to determine 2 factors: (i) the amount and cost of throughput, or the cost of processing a ton of material, sediment, etc. through the equipment; and (b) the yield or output is the number of ounces of gold received after processing a ton of material. All three factors are extremely important because the cost-benefit scenario emerges from this information. It is incumbent on the miner to maximize this yield while keeping in check the costs of producing a ton of material. Finding a quality ore body, accessing the most efficient equipment, and minimizing inputs goes to the heart of the business. ASG Miners had a sense of what they would expect. For example, one miner already knew how many grams of gold/ ton he would need to even be interested. He also shared his high and low range for labor inputs. This leads to a key finding.

*Finding 12: The project design assumes that ASG Miners will be able to break-even with small scale equipment on untested ore bodies. This is a Killer Assumption (High Probability/High Impact).*

All those interviewed and all international sources consulted indicated the success of ASGM. However, an interview with Mr. Hilbert Shields, Geologist and Executive Director of GGDMA, indicated from his position as a producer that perhaps we are assuming that the equipment and technology available can do the job. It could result that a dedicated mining engineer might need to follow closely the operations at the demos sites and work out a new process for the ore bodies in a given region. In essence, the “Pork Knockers” will require R+D to engineer a system that

makes sense and is effective for non-sedentary systems. This would involve science and mining engineering assistance from universities etc. This underscores the importance of fully monitored demonstration areas. If that assumption proves false, you could fall outside of the zone of opportunity for the small producer.

*Finding 13: The indicator, "reduction of 15 mt Hg" seems like an extremely high number and requires justification. This will need to be validated.*

Now that region 1 is off the table, so is the site that where the amount of mercury per gram of gold utilized by ASGM was to be calculated. It is especially important that control groups be measured to understand exactly how much mercury goes into a gram of gold for the ore body in question. With that calculation, the process information presented earlier can be converted to produce the indicator, "# of mt Hg. reduced" in line with the Minamata convention and into an estimate of savings for the miner.

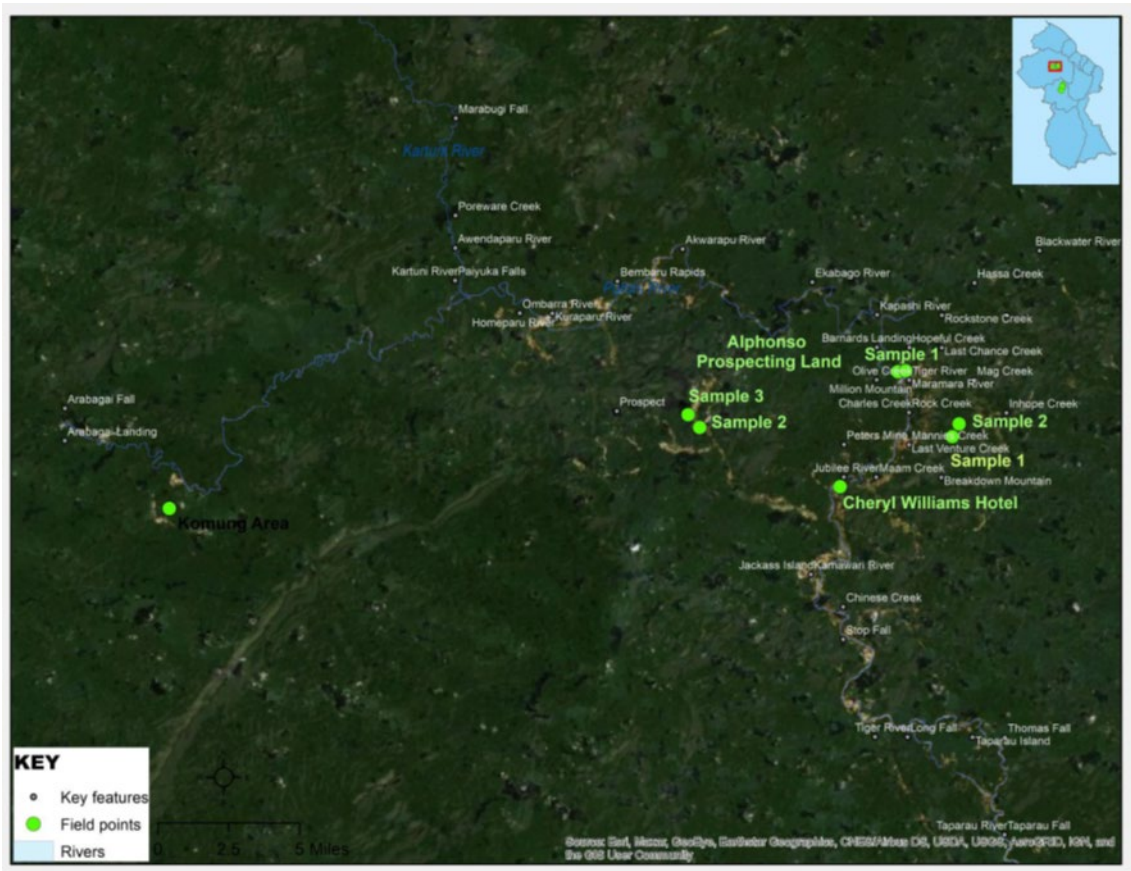
*Conclusions:*

- *Given the positive trend in the rankings presented and given the partial re-opening in Guyana, it is concluded that it is possible to achieve the outputs as stated.*
- *Prospecting indicates 1 possible site in R7 and a possible site in R8 indicates that prospecting can take place there.*

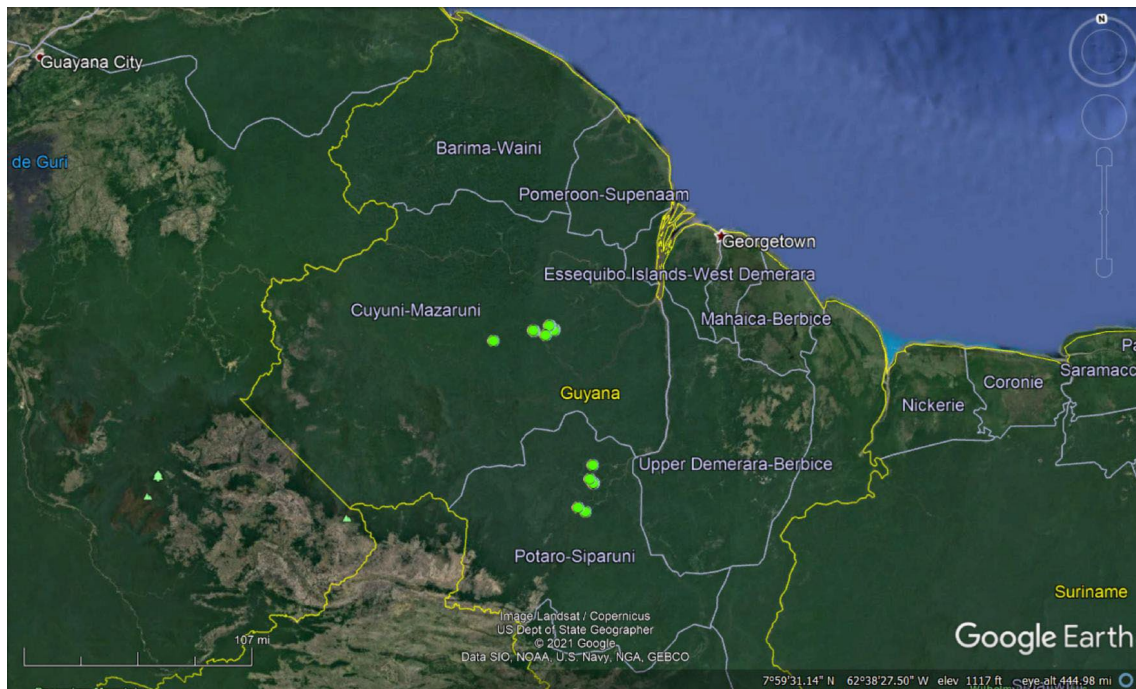
*Recommendations:*

- *Successful implementation will require that the entire organization strategically make operational all their professionals in the project to Regions 7 and 8. This involves an all-hands approach between Mining technicians, safeguards, gender, communications, etc. from CI-G and from partner organizations.*
- *Make sure to have 2 demonstrations in semi-controlled circumstances deployed. Use that information to reassess the assumptions related to the process aspects of the project. Process the monitoring information within the framework being developed for component 5.*
- *Because of the time left in the project, do not disperse resources seeking a third demo site until the first 2 in regions 7 and 8 have gone online or have been abandoned for lack of ore quality.*

**Map 1: Location of Potential ASGM Demonstration Sites in Regions 7 and 8**



**Map 2: Region 8 Potential Demonstration Sites**



Source: PMU

### IV.3.3. Overall Ranking on Component 2 Delivery of Results Financing Capital Investments.

Component 2 establishes a fully funded financing mechanism for mercury-free technologies to address the financing barrier suspected of impeding progress towards upscaling the technologies demonstrated in Component 1. The component is based on two principal outputs: (i) a feasibility assessment of mechanisms for financing technologies appropriate to Guyana based on tested mechanisms from around the world and (ii) a long-term financing mechanism for mercury-free technology to access credit and financing for producers in model sites to be able to convert to non-mercury technology.

At the time of the evaluation, only 24% of project resources were expended in support of the activities. A consultancy to provide an assessment of the financial conditions within the sector was completed albeit without the benefit of on-the-ground consultation or with cost data coming out of demonstration areas. The document review<sup>26</sup> (Laing, 2021) and findings supported the assessment for Output 2.1, is of high quality, and provides an excellent overview of the economics surrounding the decision-making of the ASG Miners.

*Finding 14: Laing, 2021 provides promising cost and return scenarios for different ore bodies and different types of equipment. The demonstrations can validate using the financing assessment as a de facto baseline while a Guyanese baseline is being developed.*

A Consultancy to develop a Financing Mechanism was eventually contracted after a protracted COVID-related delay. The consultancy required face-to-face consultations with private and public sector stakeholders that could not be arranged under the restrictions that were in place. A semi-presential semi-virtual roundtable discussion was implemented during the evaluation period. Evaluators audited the event as if it were a focus group of the entire sector. With only one exception, members of the financial sector did not attend citing that until cost and production data is available, financiers cannot see the results and opportunity and will not take the risk. The PMU will therefore need to find a way to get the results of the consultancies into the hands of the bankers.

The Financing Roundtable (CIRDI, February 2021) presented interim options and recommendations for financial mechanisms. One note paraphrased from the plenary dialogue points to the possible short-term solution for the successful completion of component 2.

*“...There are ideas worth exploring. Some of the easiest might be loaning or extending credit for equipment already owned by the government or the Project, which would create a no-risk scenario for the miner during the pilot stage. ...On the other end of the spectrum is setting up a financial entity that could channel rents from large scale mining operations into mid and small-scale operations to reduce the negative externalities caused within the ASGM sector”.*

*Finding 15: All sources indicate that it will be in the interest of the small producer to pursue measures that reduce costs by eliminating mercury. If these are combined with the market measures proposed, the project can find a workable solution. Solutions and financing will have to be scaled to different sized producers.*

---

<sup>26</sup> Laing, 2021. An economic assessment of Small and Medium Mining in Guyana

*Conclusion: It is unlikely that a sector-wide financing mechanism could be fully deployed and producing mercury free gold in all regions by the end of the Project.*

For that reason, a “Red” flag was added to the results chart on Figure 12 below. The evaluators believe that an appropriate financing mechanism, such as lend-lease equipment schemes, can create a proxy with which the economics and financial variables derived as the demos come online. The Results Framework calls for a system wide financing mechanism which clearly will not become a reality at this point in the project.

**Figure 15. Component 2 Progress Towards Results**

Component 2.: Mechanism for financing capital investments for mercury-free technologies established and functional		S	
Outcome 2: By the end of the project, a financial mechanism for capital investments for mercury-free technologies is established and functioning.		S	
Output 2.1: An assessment of financing mechanisms for artisanal, small-scale, and medium scale miners to adopt mercury-free technologies is undertaken.	S		
Output 2.2: A financial mechanism for the procurement of mercury-free gold mining technology is established and functional.			MU
ON TARGET (will be completed)		LIKELY TO BE ACHIEVED	
ON TARGET (will be completed)		NOT LIKELY TO BE ACHIEVED	
(HS) Highly Satisfactory   (MU) Moderately Unsatisfactory   (S) Satisfactory   (U) Unsatisfactory (MS) Moderately Satisfactory   (HU) Highly Unsatisfactory			

*Recommendation. A redefinition of the target2.2. is required to adjust expectations.*

*Finding 16: The project updated Outcome Indicator 2.2 from “the number of financial mechanisms” to “the amount of money that will be made available to miners through the Financing Mechanism” developed under the project.*

*Conclusion: This is necessary for adequate reporting on PlanetGOLD project level Indicator “dollars made available to ASGM through financial mechanisms” and it also focuses on the effectiveness of the mechanism in delivering the needed capital to the producers. It is also a more trackable indicator for GGMC, MNR and GGDMA and the NAP process.*

*Recommendation: Change the indicator 2.2. from “the number of financial mechanisms” to “the amount of money that will be made available to miners through the Financing Mechanism”*

Despite the delays, the Project is producing important information that will lead to the development of financing within the sector. The most interesting is to achieve a nationwide financing derived from the extractive industries themselves. Rents from industries would therefore support the elimination of an important negative externality also associated with the sector.

*Recommendation: Given the success of the Roundtable approach, work with the government to establish a Blue-chip Commission of specialists from the extractive industries and the finance sectors to analyze the options and produce a White paper on a financing mechanism for the elimination of mercury in the Extractive Industries including and focused on ASGM for discussion at high levels of government. The project can support this process as part of the policy development in Outcome 4.*



Meanwhile, the project will be providing critical information to the miners and financial institutions that include costing and viability to help them design and implement the incentive mechanism.

**Figure 16: Budget Execution for Component 2**

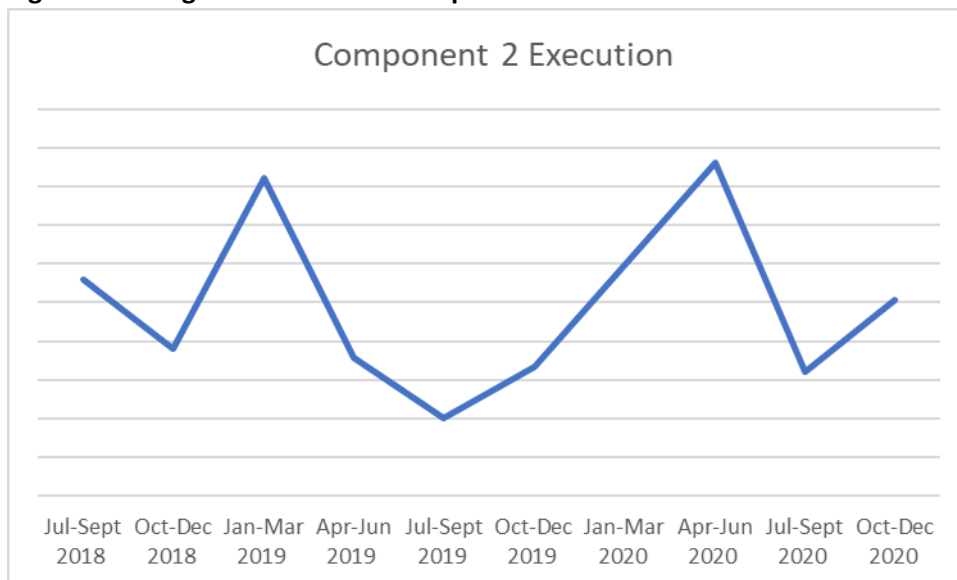


Figure 16 demonstrates a somewhat inefficient evolution of the activities within component 2. The peaks and valleys prior to September 2019 are most certainly a cause for delay of the project which, shortly after, took off from that point until the COVID crash beginning in April 2020. As mentioned earlier, the development of this Component is linked to the development of Component 1 whose late start in part contributes to the slowed project activity between March and September 2019. By the end of Q2FY20, the project had expended only 26% of its dedicated budget. It should be noted that the mentioned consultancies are funded obligations of the project. The PMU will execute the component budget by the end of the project.

#### IV.3.4. Overall Ranking on Component 3 Delivery of Results Assessing and Growing Markets

Although component 1 has evolved into the hub of the project, Component 3: *Assessing and growing markets for certified mercury-free gold from Guyana through branding, toward third-party certification* is the flagship, as the name of the project implies. The development theory behind this component is that the incentive produced from the market effect of branding and marketing a product that adheres to international, validated standards would circle back to producers and lead to a better deal and eventually reduce negative externalities on the environment and on the producers and their families.

The project design correctly begins with a demand-side assessment of domestic, regional, and international markets for Guyana’s gold and the market potential for El Dorado branded gold to identify high-potential markets. This is accomplished through two activities: (a) the identification of standards for “mercury-free gold” most appropriate for this project considering their acceptability and adoption by international downstream actors.

On the supply side, a chain-of-custody process and verification mechanism for gold produced

on model sites and an El Dorado Green Gold Branding Scheme would be developed. Buyers were to be engaged to tap into financing and a mechanism would be created for responsible gold buyers linked to a refinery abroad that can establish and maintain the chain of custody for responsibly sourced gold. The key activity is engagement with international downstream companies to inform development of acceptable standards and mechanisms to demonstrate ongoing progress towards their achievement.

To that end, a market systems analysis and feasibility study would be completed for the establishment a Guyana El Dorado Gold Commodity Exchange. This would likely be operated by private licensed dealers, who would buy raw gold and stock refined Guyana Gold, stock that would be in-country for the local jewelry industry and with the possibility of applying incentives to enable the growth of the industry locally. Education, training, and other requisite organizational support would be provided for goldsmiths and jewelers interested in the creation of a responsible gold brand of Guyana jewelry “El Dorado Gold”. El Dorado Gold producers would then be identified and linked to a green gold market abroad as is becoming common with tracing agricultural commodities, sustainably sourced furniture, etc. back to the producer.

Another key activity is a feasibility assessment for third-party certification of Guyana gold based-on the assessments of existing certification schemes. The design and testing the Branding Scheme in pilot sites would be an initial step toward the longer-term ambition of third-party certification of Guyana’s gold and increased access to high-profit markets. The structure and systems required by third-party certification schemes would be used as criteria in a stepwise approach toward certification and access to premium markets. The Branding Scheme would be informed from the start by the basic structures and systems that will be required from third-party certification schemes. The assessment of Guyana’s international artisanal small-scale gold mining value chain involves a desktop review, interviews, site visits and focus groups discussions. The process concludes with the finalization of mining value chain report with findings and recommendations.

A chain of custody process and a verification mechanism for ‘El Dorado Gold’ is to be identified and implemented with three key activities: (a) Identification and assessment of chain of custody and verification mechanisms for ‘El Dorado Gold,’ that are practical for the Guyana’s context as well as accepted by the national and international markets and downstream buyers, based on international success stories and best practice; (b) Engagement with international downstream companies to inform acceptable verification mechanisms and implementation process and (c) Development of chain of custody and verification mechanism report with findings and recommendations..

‘El Dorado Gold’ brand, is to be developed, institutionalized, and linked to the GEF Gold brand through an analysis of historical and cultural attributes of ‘responsible gold’ in Guyana and use of ‘El Dorado Gold’ to provide the basis of trademarking the brand SWOT analysis of marketing “El Dorado Gold” locally and internationally and Development of report on marketing the El Dorado Gold brand with findings and recommendations. The El Dorado Gold producers are linked to national and internationally responsibly produced gold markets through the identification of global markets for responsibly mined mercury free gold.

To make this work on-the-ground, the project would engage in consultations to sensitize miners, communities, decision-makers, etc. on the benefits and feasibility of certification in order to grow the broad-based support needed to continue toward certification through policy, future programs, initiatives, and projects.

An international firm was selected to facilitate all activities in the component and to make recommendations in establishing mercury-free branded Guyanese gold, and outline options to access national and international niche markets (Comp3). The decision was made to develop the various outputs under this objective under one consultancy allows the consultancy to link the value chain and feasibility assessment for social and environmental standards in the ASGM sector in Guyana directly to the recommendations to set up a tracking and verification system and a branding process for El Dorado gold. The idea was to save time, moving the process from analysis and recommendations to testing and deployment.

With the onset of COVID, The Scope of Work for Consultancies has been revised to ensure a successful conclusion under the current conditions. These include incorporating online consultations, working sessions, and remote training into the methodologies for completing the consultancy for the Value Chain, Standards and Branding Assessment

At 16%, Component 3 has the lowest budget execution rate of all components. This is due to two factors: The unsettled demonstration areas in Component 1 and COVID. Like component 2, many of the activities of component 3 require demonstrations producing gold for market. Without these, there is no mercury free ASGM gold around which criteria and protocols can be developed, in line with international certification standards. Certifiers need to see the operation in the landscape where the gold is being produced to verify the plethora of criteria e.g., no child labor, safety standards, no narco influence, no forced labor or abuse of indigenous territory, and certification that the gold is free of mercury, ecofriendly and beneficial to local communities in a rights-based framework. The consultants needed to assess the actual conditions, determine which standards are the best fit for the Guyanese ASGM sector, and then move forward with fitting that product into the market via pathways established early in the consultancy. As the budget execution chart in figure 16 illustrates, things moved quickly following the procurement process. Preparatory work to establish the chain of custody processes, verification mechanism and branding scheme was initiated in Q1 of YR 2, after which they were to be tested and refined for adoption. The consulting firm The DragonFly Initiative (TDI) reviewed the PlanetGOLD Criteria for Environmental and Socially Responsible Operations to fit them to Guyana's context. Follow up engagements with stakeholders were planned to fill the identified gaps and design and test the chain of custody system *in situ*. Then came COVID.

As Figure 16 also indicates, activities in the component crashed beginning in March 2020 and never fully recovered. As the economy began to open, the uncertainty around component 1 persisted.

A glimmer of good news came in April of 2020 when the Project applied to the Guyana Registrar for the El Dorado Gold brand trademark for mercury-free gold produced in Guyana which was granted.

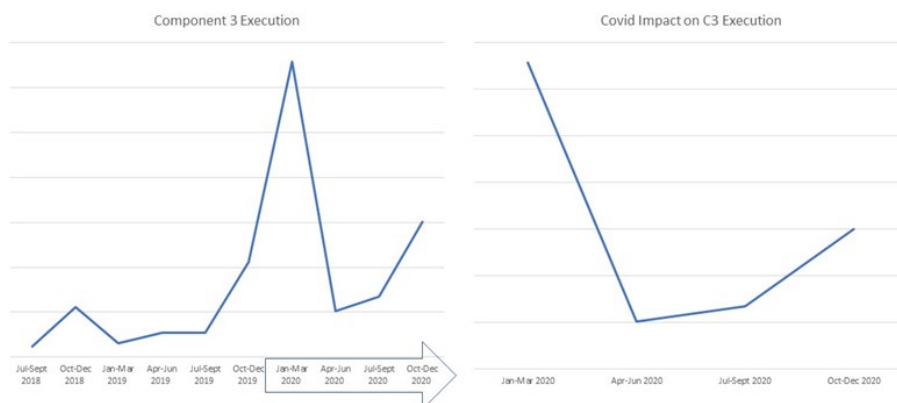
*Finding 17: There appeared to be hesitance in moving forward vigorously or in defining the concrete steps needed to get the process back on track. The project Director has networked with PlanetGold project managers. Interviews with sources in the PlanetGold network assured that resources are available to support Guyana, but the PMU and authorities only need to reach out. At the time of evaluation, the COVID situation was under control and some of the regions were opening. In fact, joint missions in support of Component 1 were underway. The evaluators did not get the sense that the PMU was poised for a strong re-entry as COVID restrictions relaxed.*

**Figure 17: Component 3. Progress Towards Results**

<b>Component 3.: Markets established for branded mercury-free gold from Guyana</b>		<b>MU</b>	
<b>Outcome 3: By the end of the project, a chain of custody process, verification mechanism for gold and an El Dorado Gold branding scheme is developed and institutionalized</b>		<b>MU</b>	
Output 3.1: Social and environmental standards, a chain of custody process, and a verification mechanism for El Dorado Gold, lined to the GEF Gold brand, is developed and institutionalized			<b>MU</b>
Output 3.2: Artisanal small-scale gold mining national and international value chain is assessed.	<b>S</b>		
Output 3.3: A chain of custody process and verification mechanism for El Dorado Gold is identified and implemented		<b>MU</b>	
Output 3.4: El Dorado Gold brand is developed, institutionalized, and linked to the GEF Gold brand.		<b>MU</b>	
Output 3.5: El Dorado Gold producers are linked to national and internationally responsibly produced gold markets.		<b>MU</b>	
<b>ON TARGET (will be completed)</b>	<b>LIKELY TO BE ACHIEVED</b>	<b>NOT LIKELY TO BE ACHIEVED</b>	
(HS) Highly Satisfactory  (MU) Moderately Unsatisfactory  (S) Satisfactory  (U) Unsatisfactory (MS) Moderately Satisfactory  (HU) Highly Unsatisfactory			

A ranking of “MU” and a yellow sign because there is a likelihood that the outputs can be completed. The Brand is now institutionalized. There are also doubts about the strength of markets soon coming out of COVID. At The time of the evaluation, the Project Director had reached out the executives in Guyana’s Gold Board (GGB) who knew the project and were extremely interested in improving Guyana’s image. The GGB director commented that they are fully supportive and would assist in creating the market linkages for non-mercury Gold. The Director also reminded evaluators that Guyana has plenty of non-mercury gold that could be used as a proxy for the exercises to develop the market linkages which would evolve to the ASGM as the demonstrations come online. Although outside of the purview of this project, the PMU can support that dialogue and encourage the Government of Guyana to seek market insertion for mid and large miners not using mercury. With the understanding that different size miners might use different standards, the capacity building aspect for Guyana’s agencies would be a benefit. The fact that the PMU has brought a strong and pertinent ally to the table around this issue gives the evaluators hope that this component will end in a good place. At present there are 700 registered gold dealers but only 5 buy GGB Gold indicating that there is plenty of space for the results from the 5 activities. The score on the outputs and outcome will trend upwards towards success if a consolidated effort is made through the following recommendations:

**Figure 18: Component 3 Expenditures**



## Covid Impact on Component 3

*Recommendation: Build a team around this issue and include GGB or have them chair. A dedicated public-private team will be needed to assist the consultants in completing the outputs. Connect the team and the GGB director to PlanetGold and other networks such as RMI, ARM, etc. The roundtable concept seems to be working well in Component 1 and Component 2. Facilitate a public-private working group can tackle the issues.*

*Recommendation: The consultants do not need to wait for Component 1. There is plenty of non-mercury Gold in Guyana that can be used to develop the brand, the connections, protocols, and test the system. As the demonstrations come online, the ASGM can be incorporated, and the full system developed.*

*Recommendation: Ask for help. The PlanetGold network and others will be willing to help think through the rough spots. Make extensive use of PlanetGold Parent Project resources for international markets and buyers.*

There will be a very tight window of time to insert MF gold from the project into a special market. The yellow light indicates that the aim is not to institutionalize rather establish a pathway, which is likely to occur if allies are involved in the process.

A Red signal was assigned to Output 3.1 because the environmental standards are not likely to be developed within this time frame, Guyana has relied on WHO standards for many parameters and the legal process to get this done is very time consuming if the process requires a legal foundation. For that reason, a RED signal is assigned. If standards are those of the certifying entity, then that situation would be more accessible. If a strategy and allies are not engaged, then the project might not make the output by the end of the project.

High dependency on CI restricted (COVID) access to the demo sites and other non-mercury producing operations were clearly a factor in low output. However, activities such as working out the details of the El Dorado Gold Brand, how to market, understanding buyers needs etc. are not all site dependent.

*Opportunity: Although not by this project, the technical capacity in GGBs sampling and testing protocol and quality assurance must be improved as part of the NAP implementation process.*

#### IV.3.5. Overall Ranking on Component 4 Delivery of Results National Policies and Incentives for Mercury Free Gold.

As described in the Project Document, Component 4 seeks a national policy on responsible gold production and value added and requisite laws or regulations are refined or drafted to support a responsible gold commodity chain. The project supports this through multi-stakeholder *fora* convened to provide input for the revision of a national policy for responsible ASGM gold mining and capacity built to ensure compliance with mining policy. This is accomplished through two aspects:

- (a) Collaboration with the Ministry of Natural Resources (MNR) legal consultant, to identify policy gaps in the existing legal framework intended to support mercury-free mining, and
- (b) Support to MNR’s expert to develop recommendations for the revision of policies to strengthen the legal framework for mercury-free ASGM gold mining based on gaps identified in the process of developing the NAP.

Support would be provided to the GGMC to develop a draft national policy on responsible gold production and value added and requisite laws and regulations refined or drafted to support a responsible gold commodity chain. Education and awareness will be provided for the gold mining community on the options and benefits of responsible gold production as well as education targeting policy makers and the public to build national commitment for a sustainable responsible gold value chain in Guyana.

Incentives for communities will be introduced based on the framework developed by the Ministry of Indigenous Peoples’ Affairs, with community participation at the very earliest stages to ensure mining-based interventions support the socio-economic needs to the said communities.

A monitoring and evaluation mechanism that documents lessons learned would be established. A business model would be developed for scaling up nationally.

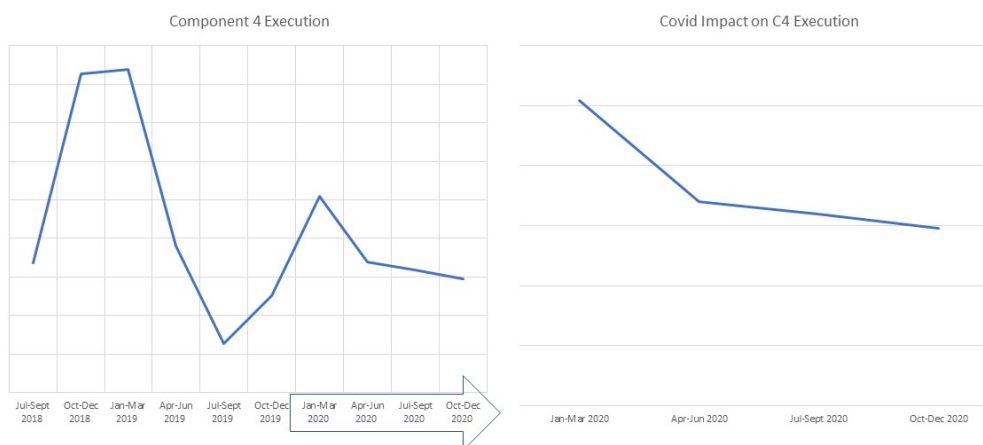
**Figure 19: Component 4. Progress towards results**

Component 4.: National policies and incentives for mercury-free gold established.		MS	
Outcome 4: By the end of the project, a national policy on responsible gold production and value added and requisite laws/regulations are revised/drafted to support a responsible gold commodity chain		MS	
Output 4.1: Multi-stakeholder fora convened to provide input for the revision of a national policy for responsible ASGM gold mining and capacity built to ensure compliance with mining policy.	S		
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="width: 33%; background-color: #28a745; color: white; padding: 2px; text-align: center;">ON TARGET (will be completed)</div> <div style="width: 33%; background-color: #ffc107; color: black; padding: 2px; text-align: center;">LIKELY TO BE ACHIEVED</div> <div style="width: 33%; background-color: #dc3545; color: white; padding: 2px; text-align: center;">NOT LIKELY TO BE ACHIEVED</div> </div>			
<small>(HS) Highly Satisfactory  (MU) Moderately Unsatisfactory  (S) Satisfactory  (U) Unsatisfactory          (MS) Moderately Satisfactory  (HU) Highly Unsatisfactory</small>			

A yellow signal indicates the likelihood that the project will facilitate a policy instrument. Since policy is not COVID sensitive, more ground should have been realized by this point, for that reason an MU rating is assigned. This will surely trend upwards as the process mentioned above unfolds. Only 13% of funds budgeted have been deployed for this outcome. The spending

sequence for the component appears to show only 2 consultancies. This is an outcome that should have been more resilient to the effects of COVID because it relies on information and communication that could have been accomplished digitally.

**Figure 20: Budget Execution, Component 4**



## Covid Impact on Component 4

The Outcome is a unidimensional outcome with only one output. As mentioned earlier, by construction it is unlikely that only one output will produce an outcome in the policy realm. The main activities listed in the project document are not entirely consistent with the description of activities provided in the PIRs and in the QIRs. For example, the paragraphs above mention incentives drafted with MIOPA, Monitoring and Evaluation and establishing a business model. The evaluators agree that staying strictly within the policy area makes more sense. From what we can ascertain, the output will not fund actions common with policy, such as lobby, education, field visits for policymakers, information campaigns, etc. We conclude that because there is no mention of those activities that are needed to achieve a national policy. If those activities are assumed and co-financed by another partner, there should be a mention of it. We can only surmise that the GEF investment will do the following:

(a) The PIR indicates that the project is supporting the MNR with the conduct of stakeholder engagements as part of the process of amending policies and legislation informed by a 2016 Gap analysis of Guyana's Laws vis-à-vis legal requirements defined by the Minamata Convention. This collaboration supports the amendments to existing laws and regulations pertaining to the ASGM sector. The groundwork through the identification of gaps in Guyana's legal framework was completed by an MNR legal consultant.

(b) The next stage involves consultations with agency officials and other stakeholders to secure buy-in for the changes to be made. It is anticipated that the assessments that will be conducted for the design of the Financing Mechanism, as well as the Chain of custody and verification mechanism, will also inform policy considerations.

(c) The project has been providing critical support to the MNR in the process of developing the NAP for the ASGM sector as required by the Minamata Convention.

The project is also supporting the MNR's harmonization process, which aims to ensure that

activities and projects related to the Minamata Convention are coordinated and implemented efficiently. The project supported the Ministry of Natural resources (MNR) - Minamata National Working Group in efforts to harmonize the work of agencies responsible for reducing mercury use in the ASGM sector. Thematic groupings were established to examine policy, technology, environmental health, restoration, M&E, and E&A. This process is meant to facilitate the development and implementation of a coordination action plan for Guyana to meet its Minamata commitments.

The project is working with the MNR to identify preliminary priority areas for coordination support, and potential synergies with project activities.

In addition, the project will continue to provide technical support to the drafting of the NAP, which is due to be completed in 2020 with support from UNEP. The development of new policies and regulations for mercury-free operations and for incentive mechanisms will be informed by the SWOT and gap analyses of Guyana's policies and legal framework which was rescheduled for Q4 of Year 2.

*Finding 18: The Outcome is poorly organized and difficult to understand the relationship to the activities, output and to the outcome. A brief document that clearly lays out the actions, products, and expected results would be welcome for a terminal evaluation. Different stakeholders within the government could not describe what the policy actions of this project hoped to achieve.*

*Recommendation: The anticipated NAP for the Minamata Convention will provide policy guidance. The Project should support the multi-stakeholder fora required to develop those policies. Delivery is expected in Q3 of FY 21 and a gap analysis has been completed. It can provide expert support to MNR, GGMC, and GGB if requested to produce the requisite regulations that facilitate the production, financing, and marketing of MFG and support the policy recommendations of the NAP.*

*Recommendation: Consider a policy working group or inter-agency task force to define the types of policies needed and to consolidate the work of the different working groups. Their role will be to produce a high-level White paper or draft policy options, suggesting a pathway to support a responsible gold commodity chain and turn NAP recommendations into policy. They can report to the Minamata Working Group.*

#### IV.3.6. Overall Ranking on Component 5 Delivery of Results Monitoring and Evaluation

This component develops the national capacity for the monitoring the use of mercury in the gold mining sector.

The project document for Component 1 opens with a description of the project's monitoring and evaluation system rather than a System for monitoring mercury in the gold mining industry, a dichotomy that has caused misinterpretation for many.

Finding 19: Early on, the M+E process for the project was confused with the M+E process for Mercury Free Mining.

*“Regular monitoring of project activities against targets and outcomes and management of risk will be done and reported on semi-annually against the Results*



*Framework. Adaptations will be made based on monitoring reports. A multi-stakeholder coordination mechanism will be established to provide advice on implementation, suggesting strategic approaches, adaptations, risk management issues, and identifying opportunities and challenges. Stakeholder platforms will be developed to share project information, obtaining guidance on implementation, and help to monitor and adapt. A conference/discussion forum will be held at the end of the project to assist in evaluating and reporting on project outcomes/impacts with presentations from key stakeholders involved in implementation and beneficiaries.”*

The PIR for 2020 adds:

*“The Project updated Outcome Indicator 5.1 to reflect tracking of the use of mercury in the ASGM sector rather than tracking the monitoring of project activities as was originally stated. This change corrects the previous misalignment between Outcome 5 and Output 5. The Monitoring and Evaluation Consultant has commenced working with the MNR consultant to determine the best methodology for monitoring the use of mercury within the Guyana ASGM sector. The project has committed to support the MNR in this area by utilizing joint resources.*

With the outcome firmly grounded in the monitoring of mercury, the two outputs make sense and read as follows:

Activity 5.1.1. Engage the MNR, Minamata Working Group and NAP consultants hired to identify needs and gaps in monitoring the use of mercury in gold mining.

According to the quarterly technical reports, *“Discussions with MNR and NAP Consultant revealed the need for an Initial Assessment to establish baselines prior to developing a comprehensive process for the monitoring and management of mercury use in the sector. The Consultant is scheduled to commence assessment exercises in November.”* and...

*“...In support of a monitoring process, GGMC has started to collect data by establishing a mercury register to tracking how much mercury is used by individual miners.”* as expressed in

Activity 5.1.2. Identify and implement process for tracking and measuring mercury use in the ASGM Sector.

*Finding 20: The outcome will not be obtained through the actions of the outputs. The national capacity of monitoring of the use of mercury in Gold Mining also depends on increasing the laboratory capacity of the GGB as a stopgap measure to calibrate and validate the observations of MNR/EPA on-the-ground. This then becomes an opportunity for future development beyond this project.*

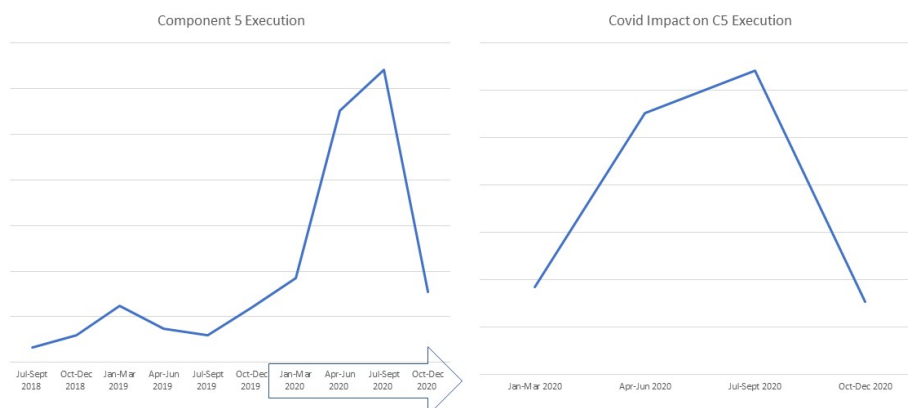
*The conclusion is that the actions of the project will clearly enhance MNR/EPAs capacity, but other actions would be needed to leave it firmly established.*

**Figure 21: Component 5. Progress towards results.**

<b>Component 5.: Monitoring and Evaluation</b>		<b>S</b>	
<b>Outcome 5: By the end of the project, national capacity of the monitoring of the use of mercury in the gold mining established and strengthened.</b>		<b>S</b>	
<b>Output 5.1: A monitoring and evaluation programme for adaptive collaborative management of instituting mercury-free mining.</b>		<b>S</b>	
<b>ON TARGET (will be completed)</b>	<b>LIKELY TO BE ACHIEVED</b>	<b>NOT LIKELY TO BE ACHIEVED</b>	
(HS) Highly Satisfactory  (MU) Moderately Unsatisfactory  (S) Satisfactory  (U) Unsatisfactory (MS) Moderately Satisfactory  (HU) Highly Unsatisfactory			

The Monitoring and Evaluation Component has a 75% budget execution rate the highest of the project. From Figure 22, there was a positive trend in execution. That tendency took a sharp decline during COVID. Because this component is linked to C1, there is a risk factor involved. A yellow rating is assigned with a high likelihood that this will be achieved. The S rating should increase as this component develops.

**Figure 22: Budget execution by quarter Component 5**



## Covid Impact on Component 5

As COVID restrictions on travel eased, joint missions with MNR, GGMC, and EPA are expediting C1 activities and are creating the framework for interinstitutional cooperation. in (c5) Joint action increases institutional capacity building for all and increases sustainability.

Evaluators concur with the change in indicator and target as stated. All actions are focused on a Mercury monitoring, which consistent with the project output 5.1.

The Ministry of Natural Resources is working to confirm mercury baselines and develop methodologies for continual measuring of mercury use levels in the ASGM sector. The project will help with establishing the monitoring and reporting system to ensure the measurement of this indicator.

As in C1, there is a need to establish a baseline. The demo sites will provide excellent cost-effective opportunities and efficiency in management. GGMC is establishing a mercury register and taking data on mercury use. This could contribute to the information gap mentioned in C1. As C1 demos come online, the M+E protocols will be tested.

*Finding 21: There are no documented actions in support of the compliance division of MNR or EPA at the systems level.*

#### IV.3.7. Overall Ranking on Component 6 Delivery of Results Communications and Knowledge Management

Component 6 provides for a strategic communication plan and materials targeting key stakeholders, including miners, decision-makers, and other local and international actors within the supply chain for awareness raising and policy advocacy are developed and implemented. The outcome is realized through the following outputs:

- (1): A strategic communication plan prepared and implemented, and materials prepared (e.g., policy papers, factsheets, videos) aimed at key stakeholders, including miners, decision-makers, and other local and international actors within the supply chain for awareness raising and policy advocacy.
- (2) Biennial Conference and annual dialogues organized to promote project findings and responsible gold mining
- (3) Coordination with PlanetGold, the global project on knowledge management activities
- (4) Education and awareness on options and benefits of responsible gold production and education targeting policymakers to build national commitment to a sustainable responsible gold value chain in Guyana

As Figure 23 demonstrates, the level of execution in Component 6 has been a bright spot in the suite of components. A green rating is assigned with confidence that C6 will be fully and effectively realized. A yellow rating was given on O.6.2 because no information was available. The component has been given an effectiveness rank of “S”. That rating is trending upward and should increase by the next PIR as the mentioned deliverables materialize.

The nature of the output lends itself to digital activities that were less likely to be suspended during COVID or political change. In addition, CI-G recruited a qualified communications specialist with private sector marketing experience. The overall rating at the MTR is “S” only because the Biennial conference is awaiting implementation. This is likely to happen, and the ranking is expected to trend upwards by the end of the project.

To date, knowledge products were produced over the year, including posters highlighting the dangers of mercury and actions to reduce exposure, a video featuring a gold buyer telling his personal experience of mercury poisoning, a video capturing work undertaken over the first year of implementation of the project, and a blog detailing the story of mining in Guyana and the importance of shifting away from mercury use in Guyana’s ASGM sector. These products have also helped profile the Planet Gold project with the videos being featured at the third Conference of Parties in Geneva and the blog featured on the “Voices” page of the PlanetGOLD website. Communication materials were produced and circulated both locally and beyond through the CI and GEF web sites.

**Figure 23: Component 6. Progress towards results**

<b>Component 6.: Communication and knowledge management</b>	<b>S</b>		
<b>Outcome 6: A strategic communication plan and materials targeting key stakeholders, including miners, decision-makers and other local and international actors within the supply chain for awareness raising and policy advocacy are developed and implemented</b>	<b>S</b>		
Output 6.1: A strategic communication plan prepared and implemented, materials prepared (e.g., policy papers, factsheets, videos) aimed at key stakeholders, including miners, decision-makers, and other local and international actors within the supply chain for awareness raising and policy advocacy	<b>HS</b>		
Output 6.2: Biennial conference and annual dialogues organized to promote project findings and responsible gold mining.			
Output 6.3: Coordination with the global project on knowledge management activities.	<b>HS</b>		
<b>ON TARGET (will be completed)</b>	<b>LIKELY TO BE ACHIEVED</b>	<b>NOT LIKELY TO BE ACHIEVED</b>	
(HS) Highly Satisfactory  (MU) Moderately Unsatisfactory  (S) Satisfactory  (U) Unsatisfactory (MS) Moderately Satisfactory  (HU) Highly Unsatisfactory			

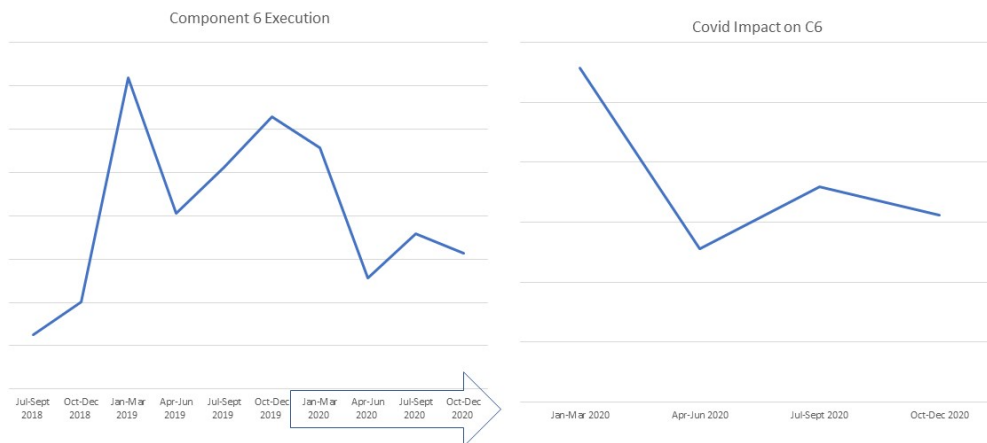
Component 6 activities in support gender and safeguard aspects, such as training to women miners, technical training media, and others are all on-track for completion. Guidelines for indigenous peoples were completed under RMI. Interviews with the NTC representative indicate that the project is planning information products in local languages.

*Finding 22: The evaluators easily found project sourced communications materials without any orientation and were impressive in quality and available globally. Evaluators had no trouble searching for and accessing information products.*

*Conclusion: The regular production of quality communication products for circulation among stakeholders has ensured that the project is on track to achieve the intended Communications and Knowledge Management outcome.*

*Recommendation: Strategically deploy communications products at the high political level to reinforce the recommendations from the NAP and buy-in on MFM financing and policy strategies.*

**Figure 24. Component 6. Budget Execution by Quarter**



## Covid Impact on Component 6

*Recommendation: Given the quality of the communications materials, strategically deploy communications assets to the communities targeted for the demonstrations in Component 1 to increase buy-in of local miners, authorities, and jewelers. The communications team should devise a strategy to facilitate the transition to mercury free mining based on the experience of using a jeweler to tell the story from the demand side. The same recommendation holds for Component 4 in promoting policy suggestions.*

*Recommendation: A suggestion made during the interview was to seek out language savvy persons from different indigenous communities that may presently work in the mining industry, even large-scale mining, to be the face of the initiative or to work as interpreters of both technology and language.*

### V. Project Implementation and Adaptive Management

Project Implementation and management was evaluated through 8 parameters that span the managerial functions needed for successful project execution ranging from successfully recruiting quality staff and contractors to sound financial management. The parameters include 8 management criteria related to internal factors related to the PMU and external factors related to CI-GEF as an implementing agency, the PSC, and other partners:

Overall, the PMU received a Mid-term Rating of “S” or Satisfactory. In most of the parameters, the PMU scores “HS” the highest ranking for excellence in recruiting qualified staff and consultants, establishing a productive work environment, Monitoring and Reporting, Interinstitutional Relationships and Financial Management. An “S/green” was awarded for Proactive and Adaptive Management and “S/yellow” and “MS” for Planning and Budget and Managing Risks, respectively. The latter two relate to responding to and preparing for a post COVID surge of activities.

## V.1. Recruitment and Staffing

Following a rocky and unstable launch period characterized by turnover, CI and CI-Guyana recruited a qualified and dedicated staff to run the PMU. The PMU is backed up by CI—Guyana staff specialists in financial management, human resources, etc. All partner organizations interviewed and especially PSC members felt that the PMU staff were dedicated, approachable and effective at responding to their requests. All also expressed effectiveness despite the COVID situation. The PMU progressed in absence of a qualified mining technician until FY2020. It appears that management wanted to respect the technical ability of their institutional partners, such as GGMC. As presented in the PIR reports, the PMU correctly assessed that the project revolved around the functioning demonstrations and the need for a qualified staff member to lead that component. This staffing decision created two benefits: a qualified interpretation of the time element involved in the exploration process and trust by miners and mining partners such as EPA, GGMC and GGDMA etc. As a result of having an additional and qualified hand on-board, the PMU began to catch-up on lost time until the onset of COVID.

Consultants selected were qualified, produced quality work, and shared the mission of the project. The Communications consultant was a prime example. During COVID she returned to region 9 to wait out the virus with her family. It occurred to her visit on her own and establish relationships with the families of ASGM. This sense of vocation was noticed across all staff and consultants interviewed. The Director of the National Toshoes Council also demonstrated a great deal of trust in the safeguard’s specialist, a relationship that we confirmed existed with all staff and consultants.

*Finding 23: Based on a review of the CVs and from interviews, CI recruited quality staff and consultants competent in their areas and that enhanced the trust between the PMU, partners, and beneficiaries. These were important in responding to the trust barrier characteristic of environmental NGOs working in the mining sector.*

**Figure 25: Rating of Project and Adaptive Management**

PROJECT MANAGEMENT	S		
Recruitment/Staffing	HS		
Productive Working Environment	HS		
Adaptive Management Planning	S		
Monitoring & Reporting	HS		
Planning & Budget	S		
Managing Risks	S		
Interinstitutional Relationships	HS		
Financial	HS		
(HS) Highly Satisfactory  (MU) Moderately Unsatisfactory  (S) Satisfactory  (U) Unsatisfactory (MS) Moderately Satisfactory  (HU) Highly Unsatisfactory			

### Productive Work Environment:

All staff interviewed felt that the PMU listened to them, took action (eventually) on issues, were not afraid to bring-up issues. They were given protective equipment for working in the field. The COVID restrictions put people first. There is clarity in what is expected of them, and the resources are available to do a good job.

*Finding 24: CI-Guyana provided a productive and safe work environment.*

### Proactive and Adaptive Management and Planning

Proactive and Adaptive Management are at both ends of a continuum. All counterpart agencies interviewed felt that the PMU was doing a good job of responding to problems, to COVID. Evaluators noticed that the PMU was not as proactive, as in the case of Components 3 and 4 as it has been with regards to Component 1. This is illustrated in the execution curves before and after COVID. In both cases, there was an unexplainable level of inertia early-on that set the delivery of the components back. As things finally got on track, COVID took away the gains. Interviews with PlanetGold partners and Implementing agency representatives formerly involved with the project confirmed that there are ample resources available to help project staff find a pathway and resources for almost all aspects of this project. They were given high marks for how they are now recovering in component 1, for mobilizing important actors in Guyana's Gold industry and for keeping things moving in lieu of political changes. There were however no extraordinary steering committee meetings to devise the pathways for components 3 and 4 or international focus groups with resources such as ARM, RMI, etc. Despite all the problems, the PMU is working full force. An impressive Financing Round table convinced evaluators that they are capable of a strong finish.

### Monitoring and Reporting

The reporting system is consistent between quarterly financial documents, quarterly technical reports, annual work plans and Project Information Reviews. Evaluators were able to track most activities and lateral investments in Gender Mainstreaming plans, etc. The only criticism if that the text in documents such as the PIR for example often does not use the output numbers when referring to activities. In some cases, the evaluator had to dig deep to match activities to Outputs or Outcomes. Another best practice is to present all outputs even if there was no activity or is completed, For example: Output 3.1.4: No Activity. Overall a particularly good effort and results in this category.

### Planning and Budget:

The AWP's, Budgets and Procurement plans are complete, realistic, and consistent with one another. The planning process is proactive even though many plans were dashed due to COVID, the PMU did follow the process. Evaluators were able to model budget expenditures and estimate unpaid obligations with the tools provided. A score of "S" was provided because the evaluators were concerned that the planning process surrounding Component's 3 and 4 could have been more organized and better documented. It was hard to understand exactly what type of policies were targets of the project. There was a gap analysis but the results of which were not mentioned. This should have happened early in the project. Evaluators are convinced that the PMU and the steering committee can find a way forward for components 3 and 4.

### Managing Risks:

As mentioned, the PMU is responding to risks. Evaluators feel that the process of managing risks could use be more proactive in contingency actions. The updated risk table presented below increases the risk rating to “high” or “Significant” for five reasons: (i) because of the assumptions of success with untested equipment and circumstances; (ii) danger of losing equipment due to flooding during deluges, among others; (iii) danger of losing product due to theft or violence; (iv) the risk augmented rating of several existing risks trending upwards; and (v) risks not previously identified. Several mitigation measures were not germane to the indicated risk. Many of the indicated risk mitigation measures are preventive. No contingencies are listed if the risk should occur are mentioned. The PMU inherited these from the design phase. The PMU maintains a comprehensive risk assessment table in the PIR to demonstrate the trends if risks materialize. Lists of contingency actions triggered in selected circumstances can keep the project on track and are needed for high-risk projects. There were significant risks listed in the Project Document that should have been addressed through modifications in the project design, especially with regards to component 1. There are also some listed risks that are not actually risks, but negative consequences of not achieving the outcomes. When this happens, the spotlight is removed from the actual risks that should be managed. Findings and recommendations on these are presented in this report on the Theory of Change and in the Risk Assessment Updated Risk Assessment Table presented below in Section V Modified Risk Assessment.

### Institutional Relationships

CI-Guyana has broken through the trust barrier that was a significant obstacle for NGOs and NGOs attempting to work in the extractive sector. Since 2016 as noted in PSC meetings from the ***Addressing the Drivers of Deforestation in Guyana and Peru***, A NORAD funded initiative to reduce the effects of deforestation in mining areas, and co-financier to the GEF initiative, CI-G engages the sector and developed a working relationship with GGDMA. The project shared results in Ha. of land recovered with the El Dorado Gold Project. More importantly, the external linkages were being formed. As described, all members of the PSC responded that the engagement of CI-G with stakeholders is a strong point. As mentioned in the previous sections, those relationships might have been better engaged in difficult times to move some of the components farther along and to solve problems or mitigate damages. The benefit of establishing trust with the miners will provide benefits to all (I)NGOs working in the sector. For these reasons, a rating of “S”/Green is applied because this aspect is trending upward now as the effects of COVID are diminishing.

### Financial Management.

The PMU submitted to the evaluators the quarterly and annual financial reports. These were complete and enabled the analysis presented above. The PSC members interviewed were satisfied with the financial management of the project’s resources. The document package did not include the independent audit results for the prior years of implementation. The evaluators hope to validate these before the final submission of the Mid-term Evaluation Report.



## VI Modified Risk Assessment

The following table is a reassessment of project risks. Reviewer’s comments are printed in italics. Overall, the project has 13 risks. Seven were presented in the approved Project Document. Six are new based on the MTR. The following table presents all new risks and evaluator comments in italics. Recommendations refer to the components affected by the risks cited. Two of the original risks are not considered as risks. The recommendations call for their reassessment or removal from the risk profile.

**Table 7: MTR Review of Risks Assessment and Mitigation Measures**

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
Outcome 1: Demonstrations established and mercury-free technology transferred	Acceptance: Few miners adopt mercury-free practices and technologies as a result of project interventions.  <i>The risk is that miners reject the technology.</i>  <i>Rejection of technology almost eliminates the possibility of future acceptance.</i>	Substantial	High	High	High Long-Term	Ensure a full market systems approach to alternative livelihoods.  Tie the El Dorado Gold brand and the project closely to Guyana’s commitment under the Minamata Convention, demonstrating that the project provides real and tangible support to the ASGM sector to participate effectively with GoG on the implementation of the convention’s commitments.  <i>Finding 25: The mitigating measures do not respond to the nature of the risk. Promoting the technology as a means of increased gains from a preferred market adds unnecessary variables and increases the risk. What happens if the technology is successful but market conditions crash? What happens if the technology does not work?</i>  <i>Recommended change in tactics: Delink the technology from the market forces. To focus on the technology. Let the miners know that the project (and they) is trying to find a better way to capture more gold from the existing ore body with less loss and less cost (no mercury). This responds to their interest. Create the conditions so that</i>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
						<p><i>they can try the technology without risk to their businesses for one month. For example, maybe create a guarantee to buy the same amount of gold that they normally produce in, for example, one month If the producer produces 5 oz. Au in one month, offer the value of X oz as a guarantee no matter what the new equipment produces. If the equipment produces more, then they have a bonus. If it produces less, they are not losing anything out-of-pocket. Then take your X oz. Au to the lab and certify it as mercury free. If the producer understands that they will evaluate it, and they will be part of the changes if this run is not successful. This will take the risk out for the producers, and you will get participation and an honest assessment of the yields. A full-time mining intern must be on-site to accompany the process and take measurements of throughput and yield, as well as fixed and variable costs. The intern could also take baseline information for the certification process. The risk rating would then be "low" Taking the gold from the site to the market is a separate issue that has other intrinsic risks.</i></p> <p><i>This type of solution is also consistent with the CI-Guyana Responsible Mining Initiative</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
Outcome 1: Demonstrations established and mercury-free technology transferred	Theft		High	High	High Immediate	<p><i>Finding 26: Not addressed in the PRODOC.</i></p> <p><i>Recommendation: Theft/Security is a serious concern for ASGM. The claim of theft could also contaminate the data taken in component 1 needed to set up a technical operation that works and for component 2: a dedicated financing mechanism. Have a dedicated mining technician on-site for the duration of the trials to validate claims of theft. Is there another collective solution?</i></p> <p><i>Are there other ways miners protect themselves? Women?</i></p> <p><i>What is the contingency for theft? collective insurance?</i></p>
Outcome 1: Demonstrations established and mercury-free technology transferred	GGDMA and GWMO do not engage and contribute to the project in its execution	Low	Not a Risk	None	None	<p>Extend existing memorandum of understanding between the GGDMA and CI-Guyana to include activities under this project.</p> <p>Establish a memorandum of understanding with GWMO.</p> <p>Partner with the GGDMA in the project preparation phase.</p> <p>Engage with any new executive body of the organizations at the earliest opportunity to secure their continued commitment.</p> <p><i>Finding 27: Risk/C1/Participation of GGDMA-GWMO This is not a risk. This is a pre-condition. They should be fully engaged in driving the process mentioned above. In fact, the mining sector organizations can be a hedge against risk in the establishment of sustainable</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
						<p><i>financing and in the ecologic recovery of mined sites. They have been supporting the ASGM sector with CI since the launch of ADOD since 2016.</i></p> <p><i>Recommendation: Risk/C1/Participation of GGDMA-GWMO. Can technicians from the private sector membership provide the monitoring, measurements and problem solving with GGMC? Can they rally corporate and social responsibility investments from their members to create a private sector financing mechanism from their membership? or investments in ecosystem recovery using lessons from Guyana RMI or ADOD? See next recommendation.</i></p>
Component 1	<p><i>Environmental: Weather Events</i></p> <p><i>Riverine mining sites destroyed by flooding. Operations interrupted by high water and/or seasonally poor access because of inclement weather.</i></p>		Medium	Medium	High	<p><i>Finding 28: No risk related to loss of equipment or loss of access to sites due to flooding or other climatic events.</i></p> <p><i>Recommendation: evaluate if there is a history of severe weather events.</i></p>
Outcome 2: By the end of the project, a financial mechanism for capital investments for	Government does not establish or capitalize the financing mechanism.	Substantial	High	High	High <i>(if you count solely on the gov't)</i>	<p>The project includes the government in the Project Steering Committee which will help build ownership for the project and advocacy for the establishment of the financing mechanism.</p> <p><i>Finding 29: This should not be a risk. This should be a pre-established condition of the project. What exactly is the risk? Political change? Change in policy? This needs to be</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
mercury-free technologies is established and functioning.						<p><i>defined. Why is this incumbent on the government? To establish, or not, a government funded financial mechanism is a political decision. The contingency therefore should be political in nature.</i></p> <p><i>Recommendation: The contingency would be to create a private sector or a public-private stimulus fund from the extractive industry to offset the negative environmental externalities of their own industry. For example, large corporations could kick-into a compensation fund based on their agreements with the government or through Corporate and Social Responsibility schemes. The role of GGDMA appears to be underutilized. Within GGDMA are the best talented, most successful, and politically connected members of the extractive industries in Guyana. They are also moving to include small scale miners through CWMO in their membership. The industry could rally support for ecological restoration or manage a stimulus fund to pre-purchase gold from miners willing to participate in the program. Larger scale miners could be rewarded through points towards their compliance packages or with some other fiscal incentive or offset. A mixture of public and private sources of financing would reduce the risk load for any given institution by spreading the risk around.</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
<p>Outcome 3:</p> <p>A chain of custody process, verification mechanism for gold and, an El Dorado Branding Scheme is developed and institutionalized</p>	<p>The Guyana Gold Board does not distinguish mercury-free from mercury gold</p>	<p>Substantial</p>	<p><i>Moderate</i></p>	<p><i>Moderate</i></p>	<p>High</p>	<p>Differentiate mercury-free gold through branding, and highlight for peer recognition, those miners who opt to participate in the El Dorado branding exercise. Participants would also be prioritized for training and exposure to practices and technologies. Branding will specify how gold is produced and highlight its responsible history. Branding will act as a signal to consumers that more of the revenue from gold sales goes to support gold miners who practice responsible mining.</p> <p><i><u>Finding 30:</u> GGB expressed interest to evaluators to brand all of Guyana's Gold. They also indicated that there is plenty of non-mercury Gold that could be used to begin that process.</i></p> <p><i><u>Recommendation:</u> Develop a pathway with GGB, identify the support needed through component 3 or one of the other GEF Gold projects and sign an MOU to support that work. This is the opportunity for a policy proclamation sought in Component 4.</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
Outcome 4.: By the end of the project, a national policy on responsible gold production and value added and requisite laws/regulations are refined/drafted to support a responsible gold commodity chain	<p>Sustainability of the project outcomes is unrealized at a landscape level.</p> <p><i>Finding: This is not a risk, rather a negative outcome.</i></p> <p><i>Discontinuity of policy?</i></p> <p><i>New policies to reactivate the economy post COVID create incentives for bad practices or more illegal mining?</i></p> <p><i>No enforcement</i></p>	Moderate				<p>Build on CI’s long history of success in multi-stakeholder processes, with a focus on “bottom up” solutions from miners and communities as the basis of all project interventions.</p> <p>Take an approach of building from points of agreement to address more complex issues.</p> <p><i>Finding 31: As stated, “Sustainability of the project outcomes is unrealized at a landscape level” is not a risk, rather a negative outcome that could be influenced by other factors outside of this component. The risk could be the occurrence of something that could derail progress on the outputs or overall outcome. A Risk might be discontinuity of policy through political change, or a unforeseen change in policy or willingness to enforce.</i></p> <p><i>Recommendation: PMU should identify the actual risk to this outcome and consult the PSC. Once the NAP is ratified, it will become the policy instrument of reference. The NAP process is advancing with GEF funding through a separate grant to UNEP/GoG. GGB has indicated their desire to brand all gold in Guyana as non-mercury. Evaluators agree that the rating is “moderate” until the variables are eliminated following the NAP process. For each risk, define actions to mitigate or contingencies if actions cannot be mitigated.</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
<p><i>Outcome 5:</i> A national capacity established for the monitoring the use of mercury in the gold mining sector</p>	<p>Finding: Risk was not evaluated for C5.</p>					<p>Finding 32: No risks were identified for Component 5. The national capacity is the function of several agencies. In the field, EPA has the lead. For the market, GGB assures the quality of the metal. The project document does not specifically define the target. We assume that this is related to field-level monitoring, but that is an assumption.</p> <p>Recommendation: It is important to review the national capacity document and NAP document when available to determine the gaps in Sampling, analysis and reporting for all agencies involved. This will confirm the scope of this project vs. future capacities that are necessary for further development. This aspect will be important for the terminal evaluation.</p>
<p>Outcome 6.: A strategic communication plan and materials targeting key stakeholders, including miners, decision makers, and other local and international actors within the supply chain for awareness raising and policy advocacy are</p>	<p>Lessons learnt do not reach target audiences.</p> <p><i>Finding 32: This is not a risk.</i></p>	Low	None	None	None	<p>Build on CI's long history of engagement at the international level in climate change and nature conservation. Further, the GEF GOLD programme is deliberately designed (separate child project) to provide opportunities for sharing of lessons learned.</p> <p><i>Finding 32: "Lessons learnt do not reach target audiences" is not a risk. This is a result.</i></p> <p><i>Recommendation: Identify the risks associated with this, if there aren't any, then remove this from the risk assessment table.</i></p>



Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
developed and implemented.						
Outcome 6.: A strategic communication plan and materials targeting key stakeholders, including miners, decision makers, and other local and international actors within the supply chain for awareness raising and policy advocacy are developed and implemented.	Brazilian miners who are legally working in Guyana undermine successful execution of project activities	Moderate				Ensure the project includes Portuguese language communications (and other relevant languages).  Engage the Brazilian Miners Association.
Overall	Climate change	Low				The project will track changes in the environment due to climate change impacts and adapt the project accordingly.  <i>Finding 33: "Climate Change" is a very weak assessment that does not link climate related risk factors to the project strategy.</i>  <i>Recommendation: Review the Climate Change scenario for the region and determine what the effects could be on the ASGM sector. For example, If extended droughts are prognosticated for the indicated regions, then crop failure</i>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
						<i>could be a reality and move more people into mining. Determine the reality for regions 7 and 8 where the activities occur.</i>
Overall	Geological events from mining activities  <i>Finding: Evaluators do not know what this refers to.</i>	Low				<p>The project is designed for implementation within the context of the wider CI-Guyana Responsible Mining Initiative. Through this initiative, the project will work with stakeholders to ensure that:</p> <ul style="list-style-type: none"> <li>• Gold mining activities are only carried out in places where viable deposits are located.</li> <li>• More efficient methods are employed to improve the recovery of gold from ore and phase out the use of mercury.</li> <li>• Effective integrated planning is implemented to reduce the impact of exploitation on forests and fresh water as well as improve the livelihood impact of the sector; and</li> <li>• Mining sites are rehabilitated for planned after-use.</li> </ul> <p><i>Finding 34: Evaluators do not know what “Geological events from mining activities” refers to.</i></p> <p><i>Recommendation: Eliminate or define</i></p>

Project Outcome	Risk (PRODOC)	Rating (PRODOC)	MTR Rating	Probability	Impact	Risk Mitigation Measures <i>Evaluator comments in italics</i>
Overall	<p>COVID-19: continues to spread in mining areas further delaying field activities.</p> <p><i>From Project Risks and safeguards Template</i></p>		<p>High</p> <p><i>Trending down.</i></p>	<i>High</i>	<i>High</i>	<p>Activity 1. Ensure all possible preparatory work is undertaken ahead of the lifting of travel restrictions to mining areas.</p> <p>Activity 2. Adjust implementation approach as much as possible to allow for implementation within the restrictions.</p>

## VII Safeguards

Evaluators reviewed the safeguard plans and related documentation, including monitoring reports, assessments, PIRs, PSC meetings and checked these actions against GEF Policies and Guidance as mentioned in this section. In effect, this section is a corollary to the section on Adaptive Management that describes the degree to which the management measures related to safeguards, including the grievance mechanism, are being effectively implemented. In addition, the evaluators were seeking to identify changes to the risks identified in the [Safeguard Screening Form](#) (Annex X) and safeguard plans at the time of CEO endorsement. In addition, evaluators checked to see if any additional safeguards have been triggered.

The screening exercise did not trigger the necessity to execute safeguards on ESIA Policy, protection of natural habitats, involuntary resettlement, policy management and physical & cultural resources policy. However, a full suite of safeguards was triggered: social, gender, maintenance of a grievance mechanism and Indigenous affairs are examined in the following section. Even though a GEF review or ESIA was deemed not necessary, the following section describes how CI and partners are constantly screening the environment in the case that a safeguard might be triggered.

During the preparatory phase, CI-G and stakeholders developed four mechanisms with preliminary recommendations that were fully developed during the inception phase of project implementation. These provisional plans were:

- a. Stakeholder Engagement Plan. This plan outlines the social location of the various stakeholders that are potentially affected by the project, identifying their key issues and priorities.
- b. Indigenous Peoples Policy. This plan includes safeguards to be applied with reference to protect the individual and collective rights of indigenous peoples and communities.
- c. Gender Mainstreaming. This plan sets out to achieve gender equality in all aspects of the project.
- d. Accountability and Grievance Compliance. The ProDoc indicates that a web-based tool to receive comments and complaints was to be developed. Nonetheless, the project ended developing this safeguard directing potential complaints to SEAM's official website and set up an email and a mobile phone number to facilitate the exchange of opinions and / or complaints.

According to the ProDoc, "CI will provide the required oversight to the finalization and adaptive implementation of the plans". The provisional plans are to be presented during the inception workshop and finalized during the first three months. The provisional plans were indeed presented but were not finalized until August 2017, thus, it took them almost a year to complete them.

All safeguards have different contents but present the national context in relation to the subject matter, work plans on how to work each subject and how to monitor and evaluate progress. This is important since the project has the commitment to regularly monitor the proposed activities, milestones, and indicators. The PMU together with MNR, GGMC, GGDMA and CI's supervision, monitor all four safeguards regularly. This can be observed on the quarterly progress reports as well as on the PIRs (2019 and 2020). More specifically, the project has monitored as follows:

**Table 6. Summary of safeguards monitoring**

Safeguard	Year and quarter	Overall Progress Status /Quarter	Justification
Stakeholder Engagement Plan In-force		IS	The plan was approved; project promoted in different events; Steering Committees organized in due time; agreements between institutions signed and meeting held.
Gender Mainstreaming Plan in-force		IS	Gender Mainstreaming is regulated by the Operations Manual for the RMI shared by the ADOD and El Dorado Gold Projects. Plan in-force. GWMO on the PSC. Integrated steering committee. Disaggregated data presented.
Accountability and Grievance Mechanisms in-force.		IS	Grievance Mechanism approved within the Stakeholder Engagement Plan. The project approved the Plan and set forth the mechanism and tools necessary for beneficiaries and public to complaint if needed. <u>No complaints were received to date.</u>
Indigenous People Plan In-force		IS	The plan was approved, and project socialized with different indigenous people’s councils, indigenous leaders and carried out several consultations processes. Representative of the National Toshoes Council on project steering committee

Note: O=overdue; D=Delayed; NS=Not started on schedule; IS=Under implementation on schedule and CA=Completed/Achieved

As can be observed from the table above and from the interviews conducted, the safeguards are useful and are being constantly monitored. In a sense, these plans are embedded in the daily work of the PMU and the activities reflected in the AWP and PIRs. It can be concluded that the **safeguards are under implementation.**

## VII.1. Environmental Safeguards

The PRODOC defines GEF and CI’s approach to developing the project’s safeguard policy. CI, as GEF Project Agency, has adopted the GEF Minimum standards on Environmental and Social Safeguards and Gender Mainstreaming and therefore, all projects, must be screened during preparatory phase and CI is to track compliance with the safeguards all throughout project implementation. If potential adverse impacts are

identified during screening, the project must take action to mitigate the impacts. CI's Environmental and Social Management Framework states that the goal is to *"prevent, minimize and mitigate any harm to the environment and to people by incorporating environmental and social concerns as an intrinsic part throughout the project cycle"*. During the screening, the project is also classified according to three categories (A, B or C) depending on the potential environmental and social impact.

The El Dorado Gold project was classified as a "C" project since environmental or social impacts were unlikely or minimal and the role of the project was to respond to a pressing environmental commitment to reduce mercury and protect critical ecosystems as a result. Regardless there is constant environmental screening. Environmental checks come from 2 perspectives: (i) The environmental guidelines for the Addressing the Drivers of Deforestation in Guyana and Peru Project and (ii) CI-Guyana Responsible Mining Initiative that ensures:

- Gold mining activities are only carried out in places where viable deposits are located.
- More efficient methods are employed to improve the recovery of gold from ore and phase out the use of mercury.
- Effective integrated planning is implemented to reduce the impact of exploitation on forests and fresh water as well as improve the livelihood impact of the sector; and
- Mining sites are rehabilitated for planned after-use.

## VII.2 Gender

From the review of the project document and the interviews with actors that participated in the formulation process, gender is successfully mainstreamed throughout the entire project. The Results Framework contains gender disaggregated indicators. All CI-G staff interviewed shared gender disaggregated perspectives. The aspect of Gender was included thoroughly in the project document and articulated in the Gender and Social Analysis Report<sup>27</sup>. The project actively takes gender disaggregated data and the Gender Action Plan is actively in-force. This was also witnessed by a Gender inclusive PSC and with the inclusion and integration of the GWMO at both the steering committee level but also at the technical level. The GWMO has approximately 476 members, including men. dealing with the interest of women in the industry and derivative industries. They are engaging in social issues including human trafficking, gender-based violence and child abuse. The evaluators were also impressed by the level of integration between the safeguard's specialist and the female leadership of the National Toshias Council.

The PMU has documented the presence of Intimate Partner Violence (IPV), sexual violence, labor exploitation, Trafficking in Persons (TIP), and gender discrimination in communities close to and affected by the ASGM sector. The presence of these is a significant factor influencing the patterns of participation or non-participation within the sector. The project, therefore, plays a significant role in highlighting these issues and advocates for stronger monitoring and enforcement systems for addressing labor violations and reports of exploitation and abuse.

The PIR indicates that Gender Mainstreaming Plan (GMP) was updated based on findings and recommendations of the Gender Assessment Report which was approved in May 2020. CI's Social Policy

---

<sup>27</sup> CI Guyana. 2020. Gender and Social Analysis Report: A Project Implementation Guidance Document. 57p.

and Practice Department participated in the Consultant’s presentation of the Gender Assessment Report. Recommendations from the report were incorporated in the most recent safeguards workplan. Some examples of these suggestions are providing suitable conditions especially for women at project activities (field demo sites, country exchanges, etc.), the inclusion of women at roundtable discussions and consultancies, producing stories of women miners to better understand their experiences and, collaborating with key partners to facilitate dialogue and advocate policies and strategies to support and address adverse social issues women face in the gold mining sector. The revised plan will provide the guidance necessary to ensure that both men and women receive culturally compatible social and economic benefits and that they do not suffer adverse effects because of project implementation.

*Finding 35: Gender is mainstreamed throughout the project and is deemed **Highly Satisfactory “HS”***

*Conclusion: The project is compliant with GEF Gender Equality Policy (SD/PL/02)<sup>28</sup> and Guidelines<sup>29</sup>*

### VII.3 Indigenous Affairs

Indigenous communities were considered in the project document through the original site selection process to ensure inclusion of Indigenous groups in the design and benefits of the project. Within the governance structure of the project, the National Toshias Council is integrated at the PSC level and is also considered a technical partner. CI-G has clearly developed a trust relationship with the Toshias leadership, in fact, to be interviewed for this evaluation, the Leader of the NTC insisted that the GI-G Social Safeguards specialist be present. The Leader of the NTC is the former director within Guyana’s Ministry of Indigenous Peoples’ (MIOPA) Affairs with a deep knowledge of the effects of policies and programs on the Toshias. The stakeholder engagement plan specifically lists the plight of “indigenous women and children at risk of being lured to mining and lumber camps deep in the interior with promises of employment and sometimes trafficked and forced into prostitution, debt bondage, intimidation or abuse.<sup>30</sup>”

Indigenous Peoples carry a heavy burden in terms of their experiences within the value chain of the ASGM sector, they are hugely impacted on both individual and community levels. Indigenous women and youth are often the victims of prevalent social ills, they are frequently exploited, as communities (and individuals) face challenges related to equal opportunities and meaningful participation and are often the people faced with the environmental impact of mining. Consideration must therefore be given to mitigating livelihood impacts, and deliberately identifying opportunities for improving the Indigenous People’s access to resources, training, technology, and financing.

The project is preparing to commence activities in Campbelltown Village, which will follow FPIC guidelines consistent with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and CI’s

---

<sup>28</sup>Global Environment Facility. November 2017. Policy on Gender Equality URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Policy.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf) ; accessed 22 January 2021.

<sup>29</sup>\_\_\_\_\_. June 2017. Guidelines on Gender Equality. URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Guidelines.pdf); accessed 22 January 2021.

<sup>30</sup> Conservation International Guyana, Stakeholder Engagement Plan. p.

Rights Base Approach (RBA). This will build on CI-Guyana’s ongoing support to the Campbelltown Village Council, which has led to the development of the community’s Village Improvement Plan (VIP).

*Finding 36: Indigenous Rights are respected and are successfully mainstreamed throughout the project.*

*Conclusion: The project is compliant with Principles and Guidelines for Engagement with Indigenous Peoples (GEF/C.42/Inf.03/Rev.1)*<sup>31</sup>

#### VII.4 Grievance Mechanism

CI-G has published an Operations Manual to guide a full Accountability and Grievance Mechanism that outlines procedures for successful collection, recording and resolving of grievances for the El Dorado Gold Project and the Addressing the Drivers of Deforestation in Guyana and Peru initiative. The mechanism is designed to (i) reduce risk; offer stakeholders impacted by the project an effective process for expressing and resolving concerns and registering complaints and to build trust.

The mechanism is regularly reviewed. The number of grievances registered is reported in quarterly reports and in the PIR and are reported to the PSC. To date no grievances have been received.

The mechanism is adapted from UN-REDD 2015 Establishing and Strengthening Grievance Redress Mechanisms and the Consultancy Group (TCG) submission to the Ministry of Natural Resources: Towards a Grievance and Redress Mechanism for REDD+ Implementation in Guyana Operations Manual.

#### VII.5 Stakeholder Engagement Plan

The project developed a full stakeholder engagement strategy as part of the PPPG activities for the project. CI-G subsequently published a full Stakeholder Engagement Plan intended to fulfill the CI-GEF agency Environmental and Social Management Framework (ESMF) Policy 9 on the processes of informing and engaging the partners and stakeholders in the project. The policy states:

*The CI-GEF Project Agency will oversee the Executing Entity involving all stakeholders, including project-affected groups, Indigenous Peoples, and local CSOs, as early as possible in the design/preparation process and ensure that their views and concerns are made known and considered.*

*Executing Entities must ensure that the key principles of the GEF Gender Mainstreaming Policy — ensuring that both men and women are given equal access to information and decision-making processes — is incorporated throughout stakeholder engagement.*

---

<sup>31</sup> \_\_\_\_\_, October 2012. Principles and Guidelines for Engagement with Indigenous Peoples. URL: [https://www.thegef.org/sites/default/files/publications/Indigenous\\_Peoples\\_Principle\\_EN.pdf](https://www.thegef.org/sites/default/files/publications/Indigenous_Peoples_Principle_EN.pdf) accessed 19 January 2021.



*Executing Entities should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialog with all stakeholders.*

*Stakeholders should be informed and provided with information regarding project activities.*

*The Executing Entity is responsible for drafting and executing the Stakeholder Engagement Plan (SEP) that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the Affected Communities, recognizing that some community members may not be able to effectively communicate outside of the local language. The SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.*

*When the stakeholder engagement process depends substantially on community representatives, the Executing Entity will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the rest of consultations to their constituents.*

The Stakeholder Engagement Policy incorporates the Gender, Indigenous and other aspects of rights-based resource management. The policy outlines regulations for monitoring the Plan. The plan identifies all stakeholders, defines their roles, and interests, and defines their participation by project component or by committee. Specific timeframes for participation are provided. CI-G actively engages in stakeholder activities with dedicated and qualified staff and reports quarterly on the Stakeholder engagement process through the quarterly and yearly reporting instruments. All persons interviewed stated that they were able to approach, share ideas, and give feedback to the PMU and that their observations were considered.

Finding 37: Stakeholder engagement is actively mainstreamed into the project's implementation framework. Highly Satisfactory, HS.

Conclusion: The Grievance mechanism and Stakeholder engagement strategy are compliant with GEF Stakeholder Engagement Policy (SD/PL/01)<sup>32</sup> and Guidelines<sup>33</sup>

## VII Sustainability

The sustainability analysis in the MTR establishes the framework for an analysis during the Terminal Evaluation will lay the foundations for this analysis during the Final Evaluation of the project. At this point

---

<sup>32</sup> \_\_\_\_\_. November 2017. Policy on Stakeholder Engagement. GEF/SD/PL/01. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Policy\\_0.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Policy_0.pdf); accessed 26 January 2021.

<sup>33</sup> \_\_\_\_\_. December 2018. Guidelines on the Implementation of the Policy on Stakeholder Engagement. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Guidelines.pdf); accessed 26 January 2021.

and because of political change and COVID-19 that have caused delays in the project, evaluator does not have sufficient inputs to analyze the financial, socioeconomic, institutional, and environmental sustainability in this exercise. As presented in the Risk Analysis but has examined the likely risks faced by the project so that the results are achieved.

An updated Risk Assessment is provided in Section VI.

Due to the effects of COVID, the main project outputs are yet to materialize. The demonstration areas in component 1 and the monitoring activities in component 5 will hint at the economic sustainability and provide initial information on the financial conditions (CAPEX) and (OPEX) needed to determine the conditions for the local miners and their activities. By the end of the project, and with only 2 demos, perhaps 3, there will not be enough information to gauge the sustainability in definite terms, but there should be enough inputs to calculate the financial terms for the financing mechanism. At that point, the project will have enough information to compare with other countries in the region. The key will be leaving MNR, GGMC, and EPA in a position to work with GGDMA on gauging the sustainability of the operations or the need for modification of the model. Given the time left in the project, it is not too early to start.

The social aspects will be predictable by the Terminal Evaluation (TE) because the lessons learned from both the ADOD and El Dorado Gold experience will be available, the social sustainability aspects will also have developed.

Politically, the ASGM NAP process is still under development. The policies to be implemented will be identified and the project's support to those will be reoriented from the present point towards a national policy or minimally a suite of regulations that will be set in motion to respond to the gaps identified.

*Conclusion: It is still too early to make judgements about sustainability.*

*Recommendation: Focus on the steps and data necessary to have a meaningful evaluation.*

## V. Conclusions and recommendations

### V.1 Conclusions

#### **Project Management:**

- Given the positive trend in the progress rankings presented and also given the partial re-opening in Guyana, it is concluded that it is possible to achieve the outputs as stated. There is not enough time however at the present closing date. A limited, no-cost extension is warranted.
- The 'project is underperforming due to a protracted political episode and due to the effects of COVID 19. The PMU is now catching up. Performance in all 6 Components is trending upwards.
- CI recruited quality staff and consultants competent in their areas and that enhanced the trust between the PMU, partners, and beneficiaries. These were important in responding to the trust barrier characteristic of environmental NGOs working in the mining sector.

#### **Project Context:**

- The Project conforms to all national, sector and GEF policies and directives. The project assists to making operational the Minamata process.
- There are elements of the baseline that were not understood nor signaled as significant to the development of the project. These are:
  - the economic decision-making of artisan miners who are mobile (non-sedentary).
  - The amount of Hg applied per gram of gold produced.
  - Attitudes of the producers towards adopting/rejecting technology.

#### **Project Strategy:**

- The TOC suggested (Dejong 2020) does not go to the root of the production culture of the ASG Miners. The miners are more interested in a refined production process which will yield more Au and lower cost of inputs (Hg) The TOC has two interlinked hypotheses: (a) improved production technology will yield more gold with no mercury and (b) farmers will make more through a branded market scheme.

#### **Project Design:**

- The highly interrelated nature of the components amplifies an internal risk. A failure in Component 1 becomes an obstacle to the success of the other components.
- When the TOC is given clarity, the suite of components, outcomes and outputs will eventually contribute to the objective. Therefore, the project correctly embraces all the elements necessary to reduce the barriers over the long term.

- The findings of Dejong, 2020 to focus output indicators better on production is validated. Adjustments to Indicators 1.2.1., 2.2.2., 4.1.1. and Output 5.1. are necessary (See Table 3).
- The multiple-stakeholder Round Table Discussions held by the Sector agencies and the PMU have been highly successful in engaging stakeholders and building trust.
- With respect to Component 1, the time and effort for evaluating the ore body was significantly underestimated. Site plans based on initial grab samples, full prospecting, and determination of type of technology should be treated as an output and given immediate and high priority. This possibly should have been a PPG activity.

**Component 1:**

- The project design assumes that ASG Miners will be able to break-even with small scale equipment on untested ore bodies. This is a Killer Assumption (High Probability/High Impact). 2 possible sites in R7 and a possible site in R8 indicates that prospecting can take place there. There is still enough time to install demos if priority is given and efficiency in deployment.
- The indicator, “reduction of 15 mt Hg” seems like an extremely high number and requires justification or validation.
- Component 1 is attainable with an All-hands effort of all departments operating within the project.

**Component 2:**

- Solutions and financing will have to be scaled to different sized producers.
- It is unlikely that a sector-wide financing mechanism could be fully deployed and produce mercury free gold in all regions by the end of the Project. This can be expected from Region 7.
- Updating indicator 2.2. is necessary for adequate reporting on PlanetGOLD project level Indicator “dollars made available to ASGM through financial mechanisms” and it also focuses on the effectiveness of the mechanism in delivering the needed capital to the producers. It is also a more trackable indicator for GGMC, MNR and GGDMA and the NAP process.
- There is a great opportunity to support the local demos with financing, even if this is a lend-lease agreement for the equipment. See Recommendations for Component 1 on how to eliminate risk in securing buy-in from ASG miners.

**Component 3:**

- The evaluators did not get the sense that the PMU was poised for a strong re-entry as COVID restrictions relaxed when compared to the other components. This is the one component that appears to need technical assistance.

**Component 4:**

- The Outcome is poorly organized and difficult to understand the relationship to the activities, output and to the outcome. A deeper discussion should have happened early in the project to

confirm the roles and expectations in the Project document. The protracted electoral process impacted the early development of policy.

- The NAP process will soon provide a policy analysis that will better define the contributions that can be made. The NAP cannot be considered a policy outcome for this project. The NAP process is a GEF funded initiative. The project can support the policy recommendations.
- Component 5: A high likelihood of completion. There are no documented actions in support of the compliance division of MNR or EPA at the system level.
- Component 6: The evaluators easily found project sourced communications materials without any orientation and were impressive in quality. The regular production of quality communication products for circulation among stakeholders has ensured that the project is on track to achieve the intended Communications and Knowledge Management outcome.

### **Risk Assessment**

- The overall risk assessment has been raised to “High” or “substantial.”
- The risk mitigation to component 1 “high” risk creates more risk. The approach links technology transfer with market measures aggregating risk from both categories. The approach or strategy voiced by miners is based on maximizing gold, not a better market price. The focus on a better market when dealing with miners does not match their interest.
- Risk: C1/Theft is not addressed in the risk mitigation table in the PRODOC. Security is an important issue for local producers.
- Risk/C1/Participation of GGDMA-GWMO. This is not a risk. This is a pre-condition and an asset. They should be fully engaged in driving the process for C1 and C2. In fact, the mining sector organizations can be a hedge against risk in the establishment of sustainable financing and in the ecologic recovery of mined sites. They have been supporting the ASGM sector with CI since the launch of ADOD in 2016.
- Risk/C1/Severe weather events: No risk related to loss of equipment or loss of access to sites due to flooding or other climatic events is presented in the project Risk Assessment.
- Risk/C2/ The Government does not establish a financing mechanism: This should not be a risk. This should be a pre-established condition of the project. What exactly is the risk? Political change? Change in policy? This needs to be defined. Why is this incumbent on the government? To establish, or not, a government funded financial mechanism is a political decision. The contingency therefore should be political in nature?
- Risk/C3/ GGB does not recognize MFG: GGB expressed interest to evaluators to brand all of Guyana’s Gold. They also indicated that there is plenty of non-mercury Gold that could be used to begin the branding process.
- Risk/C1, C5/ As stated, “Sustainability of the project outcomes is unrealized at a landscape level” is not a risk, rather a negative outcome that could be influenced by other factors outside of this component. The risk could be the occurrence of something that could derail progress on the

outputs or overall outcome. A Risk might be discontinuity of policy through political change, or a unforeseen change in policy or willingness to enforce. What would be the contingency?

- Risk/C5/ No risks were identified for Component 5. The national capacity is the function of several agencies. In the field, EPA has the lead. For the market, GGB assures the quality of the metal. The project document does not specifically define the target. We assume that this is related to field-level monitoring, but that is an assumption.
- Risk/C6/ “Lessons learnt do not reach target audiences” is not a risk. This is a result. The project can plan for this.
- Risk/C1/ Evaluators do not know what “Geological events from mining activities” refers to.
- Gender: The project is compliant with GEF Gender Equality Policy (SD/PL/02)<sup>34</sup> and Guidelines<sup>35</sup>
- Indigenous Affairs: The project is compliant with Principles and Guidelines for Engagement with Indigenous Peoples (GEF/C.42/Inf.03/Rev.1)<sup>36</sup>
- Safeguards: The Grievance mechanism and Stakeholder engagement strategy are compliant with GEF Stakeholder Engagement Policy (SD/PL/01)<sup>37</sup> and Guidelines<sup>38</sup>
- Sustainability: It is still too early to make judgements about sustainability. There is not enough information about the economic, social, political, institutional sustainability with the majority of the outputs yet to be realized.

## V.2 Recommendations

The recommendations are presented by category. All provide prescriptive measures for improving Monitoring and Evaluation and improving project performance in the delivery of outputs to make up for the time delays previously experienced.

---

<sup>34</sup>Global Environment Facility. November 2017. Policy on Gender Equality URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Policy.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf) ; accessed 22 January 2021.

<sup>35</sup>\_\_\_\_\_. June 2017. Guidelines on Gender Equality. URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Guidelines.pdf); accessed 22 January 2021.

<sup>36</sup>\_\_\_\_\_. October 2012. Principles and Guidelines for Engagement with Indigenous Peoples. URL: [https://www.thegef.org/sites/default/files/publications/Indigenous\\_Peoples\\_Principle\\_EN.pdf](https://www.thegef.org/sites/default/files/publications/Indigenous_Peoples_Principle_EN.pdf) accessed 19 January 2021.

<sup>37</sup>\_\_\_\_\_. November 2017. Policy on Stakeholder Engagement. GEF/SD/PL/01. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Policy\\_0.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Policy_0.pdf); accessed 26 January 2021.

<sup>38</sup>\_\_\_\_\_. December 2018. Guidelines on the Implementation of the Policy on Stakeholder Engagement. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Guidelines.pdf) ; accessed 26 January 2021.

### **Project Management:**

- Extend the project close by 6 months through a no-cost extension modality. This will enable technical staff to continue working until the formal closure date without drawing attention away from technical activities during closure. Evaluators base this decision on the positive trend in the delivery of project activities.
- Deployment of project resources needs to be rescheduled within a new work plan that puts all staff and partners with new and realistic timeframes for realizing outputs.
- There appears to be a duplication of effort across all Gold Projects. The Minamata Working Group and the Implementing Agency should discuss how this can be eliminated.

### **Project Design:**

- Consciously update the baseline through measurement of these items through a survey and through trials with control groups for Hg. Capture the information as part of the development of the site plans and installation of demonstration areas in Component 1 and through the Monitoring System in Component 5.

### **Project Strategy**

- Test the assumption that the available technology will produce an acceptable outcome for ASGM producers within the socio-economic and technological variables that could surface in demo areas in promoting the demos, focus the C1 demos on understanding the efficiency of the equipment and the yield. Create conditions for no-risk experimentation by miners (see recommendation below). Provide a technician to accompany the demos 100% of the time to measure the variables such as throughput, output (Au/ton processed), labor inputs for OPEX, and the Hg reduction calculation. This information will indicate that the equipment is correctly deployed and utilized according to specifications.
- TOC: Review the suggested TOC with partners to make sure the messaging and focus of the components matches the expectations of the beneficiaries
- Do not redesign components. Consider changing the approach or focus of each component (See recommendations per component) to effectively delink them in the eyes of the beneficiaries.
- Adjusting the language of log frame indicators 1.2.1., 12.2.2., 4.1.1., and output 5.1 is necessary to correct irrelevant constructions. Correct Language per Table 3 or as presented in Annex IX.

### **Component 1:**

- Successful implementation will require that the entire organization to strategically deploy all of their professionals' assets in the project to Region 8. This involves an all-hands approach between mining technicians, safeguards, gender, communications, etc. from CI-G and from partner organizations.
- Make sure to have 2 demonstrations in semi-controlled circumstances deployed. Use that information to reassess the assumptions related to the process aspects of the project. Process the monitoring information within the framework being developed for component 5. Because of the time left in the project, do not disperse resources seeking a third demo site until the first 2 in region 7 have gone online or have been abandoned for lack of ore quality.

- Assure an adequate control group to arrive at a conversion factor for no. of grams of Hg per gr. of Au processed.
- A validation of the target 1.2.1., “the number of pounds of Hg” is required to adjust expectations.

#### **Component 2:**

- Change the indicator 2.2. from “the number of financial mechanisms” to “the amount of money that will be made available to miners through the Financing Mechanism”
- Implement the recommendations from the financing roundtable. Work with a dedicated group to define system-level actions for macro financing of the ASGM subsector or to capitalize larger scale opportunities. Consider a lend-lease strategy for the short-term or for implementing demos in Component 1.

#### **Component 3:**

- Build a team around this issue and include GGB or have them chair. A dedicated public-private team will assist the consultants in completing the outputs. Connect the team and the GGB director to PlanetGold and other networks such as RMI, ARM, etc.
- The consultants do not need to wait for Component 1. There is plenty of non-mercury Gold in Guyana that can be used to develop the brand, the connections, protocols, and test the system. As the demonstrations come online, the ASGM can be incorporated, and the full system developed.
- Ask for help. The PlanetGold network and others will be willing to help think through the rough spots. Make extensive use of PlanetGold Parent Project resources for international markets and buyers. The roundtable concept seems to be working well in Component 1 and Component 2. Facilitate a public-private working group can tackle the issues.
- Although the El Dorado Gold project is not focused on small scale or large producers, GGB can be encouraged to establish the pathway to a validated non-mercury gold market for mid-sized or large producers using non-mercury processes. GGB is interested in exploring opportunities to improve Guyana’s Brand and reputation with respect to quality control. Perhaps PlanetGold could support with ideas or contacts.

#### **Component 4:**

- A brief document that clearly lays out the actions, products, and expected results would be welcome for a terminal evaluation.
- The anticipated NAP for the Minamata Convention will provide policy guidance. The Project should support the multi-stakeholder process to develop those policies. Delivery is expected in Q3 of FY 21 and a gap analysis has been completed. It can provide expert support to MNR, GGMC, and GGB if requested to produce the requisite regulations that facilitate the production, financing and marketing of MFG and support the policy recommendations of the NAP.
- Consider a policy working group or inter-agency task force to define the types of policies needed and to consolidate the work of the different working groups. Their role will be to produce a high-level White paper or draft policy options, suggesting a pathway to support a responsible gold commodity chain and turn NAP recommendations into policy. They can report to the Minamata Working Group. Better program expenditures to the end of the project based-on the agenda of the group.



### **Component 5:**

- The compliance divisions of MNR and EPA are not mentioned. Improve the visualization of the strategy to monitor mercury. Define the strategy for developing this capacity within MNR, EPA, GGMC, GGB, etc. A clear and bankable strategy will be an especially important asset for future development within the sector and within the NAP implementation program.

### **Component 6:**

- Given the quality of the communications materials, strategically deploy communications assets to the communities targeted for the demonstrations in Component 1 to increase buy-in of local miners, authorities, and jewelers. The communications team should devise a strategy to facilitate the transition to mercury free mining based on the experience of using a jeweler to tell the story from the demand side. The same recommendation holds for Component 4 in promoting policy suggestions.
- A suggestion made during the interview was to seek out language savvy persons from different indigenous communities that may presently work in the mining industry, even large-scale mining, to be the face of the initiative or to work as interpreters of both technology and language.

### **Project Management:**

- Extend the termination date of the project by 6 months through a no-cost extension modality.
- Develop an updated workplan to validate expected timetable for each output. An illustrative Work Plan is provided at the end of this section.

### **Risk Assessment and Management of Risks:**

- Delink the technology from the market forces. To focus on the technology. Let the miners know the project and the miners share a common interest: to capture more gold from the existing ore body by using technology that will have less loss of gold dust and more processing capacity with at a lower cost (no mercury). That message interests the ASG Miners. Create the conditions so that they can try the technology without risk to their businesses for one month. For example, maybe create a guarantee to buy the same amount of gold that they normally produce in, for example, one month. If the producer produces X oz. Au in one month, offer the value of X oz as a guarantee no matter what the new equipment produces. If the equipment produces more, then they have a bonus. If it produces less, they are not losing anything out-of-pocket. Then take your X oz. of Au to the lab and certify it as mercury free. If the producer understands that they themselves will evaluate the process. They will participate in developing changes to the system in the event that the run is not successful. This will eliminate the risk for the producer, assure participation and provide for an honest assessment of the yields. A full-time mining intern must be on-site to accompany the process and take measurements of throughput and yield, as well as fixed and variable costs. The intern could also take baseline information for the certification process. The risk rating would then be “low” Taking the gold from the site to the market is a separate issue that has other intrinsic risks.
- Risk/C1 Theft/Security is a serious concern for ASGM. The claim of theft could also contaminate the data taken in component 1 needed to set up a technical operation that works and for component 2: a dedicated financing mechanism. Have a dedicated mining technician on-site for

the duration of the trials to validate claims of theft. Is there another collective solution? Are there other ways miners protect themselves? Women? What is the contingency for theft?

- Risk/C1/Participation of GGDMA-GWMO 1. Eliminate this from the risk table. The contingency would be to create a private sector or a public-private stimulus fund from the extractive industry to offset the negative environmental externalities of their own industry. For example, large corporations could kick-into a compensation fund based on their agreements with the government or through Corporate and Social Responsibility schemes. The role of GGDMA appears to be underutilized. Within GGDMA are the best talented, most successful, and politically connected members of the extractive industries in Guyana. They are also moving to include small scale miners through CWMO in their membership. The industry could rally support for ecological restoration or manage a stimulus fund to pre-purchase gold from miners willing to participate in the program. Larger scale miners could be rewarded through points towards their compliance packages or with some other fiscal incentive or offset. A mixture of public and private sources of financing would reduce the risk load for any given institution by spreading the risk around.
- Risk/Climate/C1: evaluate if there is a history of severe weather events that could destroy equipment deployed in Component 1. The mining systems are riverine systems that might be vulnerable.
- Risk/GGB/C3 does not recognize Mercury Free Gold: Develop a pathway with GGB, identify the support needed through component 3 or one of the other GEF Gold projects and sign an MOU to support that work. This is the opportunity for a policy proclamation sought in Component 3.
- Risk/"Sustainability of the project outcomes is unrealized at a landscape level"/C1: PMU should identify the actual risk to this outcome and consult the PSC. Once the NAP is ratified, it will become the policy instrument of reference. The NAP process is advancing with GEF funding through a separate grant to UNEP/GoG. GGB has indicated their desire to brand all gold in Guyana as non-mercury. Evaluators agree that the rating is "moderate" until the variables are eliminated following the NAP process. For each risk, define actions to mitigate or contingencies if actions cannot be mitigated.
- Risk/Safeguards/ "Lessons learnt do not reach target audiences" is not a risk. This is a result: Identify the risks associated with this, if there are not any, then remove this from the Risk Assessment Table
- Risk/Safeguards/ "Climate Change": Review the Climate Change scenario for the region and determine what the effects could be on the ASGM sector. For example, if extended droughts are prognosticated for the indicated regions, then crop failure could be a reality and move more people into mining. Determine the reality for regions 7 and 8 where the activities occur.
- Risk/C1: "Geological events from mining activities": Eliminate or define.

#### Sustainability:

- Not enough information to gauge sustainability. Focus on the steps and data necessary to have a meaningful Terminal Evaluation.

Table 7: Project Work Plan and Suggested Timetable

PROJECT TIMELINE			ProDoc: May 4, 2018 - April 30, 2022 / Recommended Extension: Dec 31, 2022																					
			Start Date	MTR																End Date	Recommended Extension			
ON TARGET	LIKELY TO BE ACHIEVED	NOT LIKELY TO BE ACHIEVED	Year 1 (FY19)				Year 2 (FY20)				Year 3 (FY21)				Year 4 (FY22)				Year 5 (FY23)					
			Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
PLANNED		SUGGESTED		Apr-Jun 2018	Jul-Sep 2018	Oct-Dec 2018	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Mar 2020	Apr-Jun 2020	Jul-Sep 2020	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sep 2021	Oct-Dec 2021	Jan-Mar 2022	Apr-Jun 2022	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023
Outcome 1: By the end of the project, demonstrations established and mercury-free technology transferred.																								
Output 1.1: Two sites for demonstration mercury-free practices and technologies are established and functional.																								
Output 1.2: Mercury-free gold is produced from one Region.																								
Output 1.3: Mercury-free gold mining practices and technologies transferred to at least 80% of miners in Region 9 and 100% of mining operations in Region 8 are exposed to these practices and technologies.																								
Outcome 2: By the end of the project, a financial mechanism for capital investments for mercury-free technologies established and functioning.																								
Output 2.1: An assessment of financing mechanisms for artisanal, small-scale, and medium-scale miners to adopt mercury-free technologies is undertaken.																								
Output 2.2: A financial mechanism for the procurement of mercury-free gold mining technology is designed.																								
Outcome 3: By the end of the project, a chain of custody process, verification mechanism for gold and an El Dorado Branding Scheme is developed and institutionalized.																								
Output 3.1: Social and environmental standards, a chain of custody process, and a verification mechanism for El Dorado Gold, linked to the GEF Gold brand is developed and institutionalized.																								
Output 3.2: El Dorado producers are linked to international responsibly produced gold markets.																								
Output 3.3: A chain of custody process and a verification mechanism for 'El Dorado Gold' is identified and implemented																								
Output 3.4: 'El Dorado Gold' brand, is developed, institutionalized and linked to the GEF Gold brand.																								

PROJECT TIMELINE			ProDoc: May 4, 2018 - April 30, 2022 / Recommended Extension: Dec 31, 2022																				
			Start Date	MTR																End Date	Recommended Extension		
ON TARGET	LIKELY TO BE ACHIEVED	NOT LIKELY TO BE ACHIEVED	Year 1 (FY19)				Year 2 (FY20)				Year 3 (FY21)				Year 4 (FY22)				Year 5 (FY23)				
PLANNED	SUGGESTED		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
			Apr-Jun 2018	Jul-Sep 2018	Oct-Dec 2018	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Mar 2020	Apr-Jun 2020	Jul-Sep 2020	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sep 2021	Oct-Dec 2021	Jan-Mar 2022	Apr-Jun 2022	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023
<i>Output 3.5: El Dorado Gold producers are linked to national and internationally responsibly produced gold markets.</i>																							
Outcome 4: A National policy on responsible gold production and value added and requisite laws/regulations are refined/drafted to support a responsible gold commodity chain.																							
Output 4.1: Multi-stakeholder fora convened to provide input for the articulation of a national policy for responsible ASGM gold mining.																							
Outcome 5: Regular monitoring of project activities against targets and outcomes and management of risk will be done and reported on semi-annually against the Results Framework. Adaptations will be made based on monitoring reports.																							
Output 5.1: Regular monitoring reports of project activities against targets and outcomes and management of risk will be prepared and reported on semi-annually against the Results Framework.																							
Outcome 6: A strategic communications plan and materials targeting key stakeholders, including miners, decision makers, and other local and international actors within the supply chain for awareness raising, policy advocacy is developed and implemented.																							
Output 6.1: A strategic communication plan prepared and implemented, and materials prepared (e.g. policy papers, factsheets, videos) aimed at key stakeholders, including miners, decision-makers, and other local and international actors within the supply chain for awareness raising, policy advocacy																							
Output 6.2: Biennial Conference and Annual dialogues organized to promote Project Findings and Responsible Gold Mining.																							

PROJECT TIMELINE	ProDoc: May 4, 2018 - April 30, 2022 / Recommended Extension: Dec 31, 2022																						
	Start Date											MTR							End Date	Recommended Extension			
		Year 1 (FY19)				Year 2 (FY20)				Year 3 (FY21)				Year 4 (FY22)				Year 5 (FY23)					
ON TARGET	LIKELY TO BE ACHIEVED	NOT LIKELY TO BE ACHIEVED	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
PLANNED	SUGGESTED		Apr-Jun 2018	Jul-Sep 2018	Oct-Dec 2018	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Mar 2020	Apr-Jun 2020	Jul-Sep 2020	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sep 2021	Oct-Dec 2021	Jan-Mar 2022	Apr-Jun 2022	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023
Output 6.3: Coordination with the global project on Knowledge Management activities																							
Output 6.4: Education and awareness on options and benefits of responsible gold production and education targeting policy-makers builds national commitment to a sustainable responsible gold value chain in Guyana.																							
Project Management																							
Project Administrative and Financial Closure																							
Terminal Evaluation																							

## Annexes

### Annex I. Terms of Reference

#### Midterm Review Background:

The Global Environment Facility (GEF) requires mid-term reviews (MTRs) for full sized projects and encourages MTRs for medium sized projects. MTRs are conducted by independent consultants and are used as an adaptive management tool by GEF Agencies and as a portfolio monitoring tool by the GEF Secretariat. MTRs are primarily a monitoring tool to identify challenges and outline corrective actions to ensure that a project is on track to achieve maximum results by its completion.

#### Key Tasks:

1. Based on an approved work plan, the consultant will conduct first a desk review of project documents (i.e. PIF, CI-GEF Project Document, plans related to the Environmental and Social Safeguards, Gender, Stakeholder Engagement policies, Project Inception Report, Quarterly Reports, Project Implementation Reports, Finalized GEF focal area Tracking Tools or Core Indicators, policies and guidelines used by the Executing Agency, CI-GEF Evaluation Policy, GEF Monitoring Policy, GEF Evaluation Policy, project operational guidelines, manuals and systems, etc.)
2. The consultant will host a MTR workshop (in person/virtual) with the Executing Agencies to clarify understanding of the objectives and methods of the MTR. The conclusion of the workshop will be summarized in an Inception Workshop Report with the following information:
  - (a) Identification of the subject of the review, and relevant context
  - (b) Purpose of the MTR: why is the MTR being conducted at this time, who needs the information and why?
  - (c) Objectives of the MTR: What the MTR aims to achieve (e.g., assessment of the results of the project, etc.)
  - (d) Scope: What aspects of the project will be covered, and not covered, by the MTR
  - (e) Identification and description of the criteria (including relevance, effectiveness, results, efficiency, and sustainability)
  - (f) Key questions
  - (g) Methodology including approach for data collection and analysis, and stakeholder engagement
  - (h) Rationale for selection of the methods, and selection of data sources (i.e., sites to be visited, stakeholders to be interviewed)
  - (i) System for data management and maintenance of records
  - (j) Intended products and reporting procedures
  - (k) Potential limitations of the MTR

3. The consultant will then undertake the mid-term review of the project, including any interviews and site visits. The consultant should work with the Executing Agency(ies) to identify the list of stakeholders to be consulted as part of the MTR; it is expected that the Operational Focal Point and government counterparts engaging on the project should be in the list of stakeholders included in the MTR.

4. The consultant will produce a draft and final Mid-term review report. The draft and final reports should at the minimum contain the information below:

Executive summary including a table of recommendations.

Project Strategy (Results Framework):

- Undertake a critical analysis of the project's results framework, indicators, and targets, assess how 'SMART' the midterm and end-of-project targets are (Specific, Measurable, Attainable, Relevant, Time-bound), and suggest specific amendments/revisions to the targets and indicators as necessary.
- Examine if progress so far has led to or could in the future catalyze beneficial development effects that should be included in the project results framework and monitored on an annual basis.
- Project Justification (design of the GEF project).
- Review the problem addressed by the project and the underlying assumptions.
- Review the effect of any incorrect assumptions or changes to the context to achieving the project results as outlined in the Project Document.
- Review the relevance of the project strategy and assess whether it provides the most effective route towards expected/intended results.
- Review how the project addresses country priorities.
- Review decision-making processes, project governance, implementing and executing arrangements.

Progress Towards Results:

- Review the log frame indicators against progress made towards the end-of-project targets; color code progress in a 'traffic light system' based on the level of progress achieved; assign a rating on progress for the project objective and each outcome; make recommendations from the areas marked as 'not on target to be achieved' (red).
- Compare and analyze the GEF Tracking Tool or Core Indicators at the Baseline with the one completed right before the Midterm Review.
- Identify remaining barriers and bottlenecks to achieving the project objective and project results.
- By reviewing the aspects of the project that have already been successful, identify ways in which the project can further expand these benefits.

Safeguards:

- Review safeguard plans and any safeguard related documentation, including monitoring reports, assessments, PIRs etc.
- Analyze whether management measures related to safeguards, including the grievance mechanism, are being effectively implemented
- Analyze whether there is any change to the risks identified in the safeguard screening form and safeguard plans at the time of CEO endorsement
- Analyze whether additional safeguards have been triggered as a result of project implementation.
- Specifically for the implementation of the Stakeholder Engagement Plan, determine the percentage of stakeholders who rate as satisfactory the level at which their views and concerns are taken into account by the project

Project Implementation and Adaptive Management: Assess the following categories of project progress:

- Quality of supervision by the CI-GEF Agency
- Execution Arrangements.
- Work Planning.
- Finance and Co-financing.
- Project-level monitoring systems.
- Stakeholder Engagement.
- Gender Mainstreaming
- Reporting.

Sustainability: Assess overall risks to sustainability factors of the project in terms of the following four categories:

- Financial risks to sustainability.
- Socio-economic risks to sustainability.
- Institutional framework and governance risks to sustainability.
- Environmental risks to sustainability.
- Any additional external risks that could affect project outcomes.

Recommendations: Recommendations should be succinct suggestions for critical intervention that are specific, measurable, achievable, and relevant. Recommendations should be linked to the findings in the above categories. The recommendations should discuss the need for action, the recommended action



along with its likely consequences vis-à-vis status quo and other courses of action, the specific actor/actors that need to take the action, and time frame for it.

Expected Outputs and Deliverables:

<b>Deliverables</b>	<b>Responsibilities of the Consultant</b>	<b>Responsibilities of Project Agency, Executing Agency</b>	<b>Date Due</b>
MTR Desk Review	Conduct Desk Review	Provide all relevant documents (e.g., PIR, PRODOC, PIF, Workplans, Monitoring Reports etc.)	05.01.2021
MTR Inception Workshop and Inception Workshop Report	Draft Agenda Session plans	Facilitate names, invitations, approve agenda.	30.01.2021 3-4.02.2021 15.02.2021
Undertake MTR	Prepare interview tools  Team logistics	Assist in coordination of meetings.  Inform teams of stakeholder roles and customs.  Provide additional context on stakeholders.  Advise stakeholders	16.02.2021-
Presentation of initial findings to the Executing Agency, CI GCO and CI-GEF Agency at the end of MTR mission	Draft 1 Report with Preliminary findings for discussion  Follow-up clarifications as required	Circulate findings and provide feedback	Within 1 week of MTR Mission
Draft Final Report: Full report with annexes to be shared with CI GCO, CI-GEF Agency, Executing Agencies	Prepare report and annexes	Circulate report and provide feedback	Within 3 weeks of the MTR mission
Final Report: Revised report incorporating comments including annexed audit trail detailing how all received comments have (and have not)	Prepare and submit final report	Approval	

been addressed in the final MTR report			
--	--	--	--

Annex II. MTR Evaluation Matrix

Evaluative Criteria Questions	Indicators	Sources	Methodology
<b>Relevance: How does the project relate to the main objectives of the GEF focal area, and to the environment and development priorities at the local, regional, and national levels?</b>			
<ul style="list-style-type: none"> <li>How and why have project outcomes and strategies contributed to the achievement of the expected results? Have the project outcomes contributed to national development priorities and plans?</li> </ul>	<ul style="list-style-type: none"> <li>Number of laws and policies approved by beneficiary countries</li> </ul>	<ul style="list-style-type: none"> <li>APR; QPR</li> </ul>	<ul style="list-style-type: none"> <li>Review reports, Focus groups and virtual semi-structured interviews</li> </ul>
<ul style="list-style-type: none"> <li>Are the project's objectives and components clear, practicable and feasible within the project's timeframe?</li> </ul>	<ul style="list-style-type: none"> <li>Number and type of AWP and budget revisions</li> </ul>	<ul style="list-style-type: none"> <li>AWPs; CDRs</li> </ul>	<ul style="list-style-type: none"> <li>Revision of AWPs, focus groups and semi-structured interviews</li> </ul>
<ul style="list-style-type: none"> <li>Were the capacities of executing institutions and counterparts properly considered when the project was designed?</li> </ul>	<ul style="list-style-type: none"> <li>Degree of outputs accomplishments by stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>APR; QPR; CDR</li> </ul>	<ul style="list-style-type: none"> <li>Comparison of expected targets versus actual performance</li> </ul>
<ul style="list-style-type: none"> <li>Were counterpart resources (funding, staff, and facilities), enabling legislation, and adequate project management arrangements in place at project entry?</li> </ul>	<ul style="list-style-type: none"> <li>Degree of outputs accomplishments</li> </ul>	<ul style="list-style-type: none"> <li>Semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Review reports and virtual semi-structured interviews</li> </ul>
<ul style="list-style-type: none"> <li>What are the underlying factors beyond the project's immediate control and to what extent they have influenced outcomes and results? How appropriate and effective were the project's management strategies for these factors.</li> </ul>	<ul style="list-style-type: none"> <li>Risk mitigation measures implementation</li> </ul>	<ul style="list-style-type: none"> <li>APR; semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Review reports and semi-structured interviews</li> </ul>
<b>Effectiveness: To what extent have the expected outcomes and objectives of the project been achieved?</b>			
<ul style="list-style-type: none"> <li>To what extent have the project objectives and outcomes, as set out in the Project Document, project's Logical Framework and other related documents, have been achieved?</li> </ul>	<ul style="list-style-type: none"> <li>Degree accomplishment targets set on logical framework</li> </ul>	<ul style="list-style-type: none"> <li>APRs; semi-structured interviews</li> <li>Logical framework</li> </ul>	<ul style="list-style-type: none"> <li>Review APRs, QPRs; interviews</li> <li>Desktop review</li> </ul>

<ul style="list-style-type: none"> <li>Are the Mid-term and end targets SMART?</li> </ul>	<ul style="list-style-type: none"> <li>Degree of indicators and targets considered SMART</li> </ul>	<ul style="list-style-type: none"> <li>Logical framework</li> </ul>	<ul style="list-style-type: none"> <li>Desktop review</li> </ul>
<ul style="list-style-type: none"> <li>Review planned strategies and plans for achieving the overall objective of the project within the timeframe. Are the activities leading to outputs executed within the expected timeframes?</li> </ul>	<ul style="list-style-type: none"> <li>Degree accomplishment targets set on logical framework</li> </ul>	<ul style="list-style-type: none"> <li>APRs; semi-structured interviews</li> <li>Budget</li> </ul>	<ul style="list-style-type: none"> <li>Review APRs, QPRs; interviews</li> <li>Budget execution per output</li> </ul>
<ul style="list-style-type: none"> <li>Were the assumptions made by the project Validated and what new assumptions that should be made could be identified?</li> </ul>	<ul style="list-style-type: none"> <li>Degree of change in assumptions</li> </ul>	<ul style="list-style-type: none"> <li>APRs; semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of data obtained from APRs plus interviews</li> </ul>
<ul style="list-style-type: none"> <li>Were the project budget and duration planned in a cost-effective way?</li> </ul>	<ul style="list-style-type: none"> <li>% expenditure vs planned budget</li> </ul>	<ul style="list-style-type: none"> <li>PRODOC Budget + CDRs</li> </ul>	<ul style="list-style-type: none"> <li>Review of Project Budget vs CDRs and interviews</li> </ul>
<ul style="list-style-type: none"> <li>How and to what extent have implementing agencies contributed and national counterparts (public, private) assisted the project?</li> </ul>	<ul style="list-style-type: none"> <li>Number of MOUs</li> </ul>	<ul style="list-style-type: none"> <li>APRs; semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of data obtained from APRs plus interviews</li> </ul>
<ul style="list-style-type: none"> <li>Has COVID 19 crisis affected the implementation of the project's activities?</li> </ul>	<ul style="list-style-type: none"> <li>Change in AWP</li> </ul>	<ul style="list-style-type: none"> <li>semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of data obtained from interviews</li> </ul>

**Efficiency: Was the project implemented efficiently, in-line with international and national norms and standards?**

<ul style="list-style-type: none"> <li>How useful was the logical framework as a management tool during implementation and any changes made to it?</li> </ul>	<ul style="list-style-type: none"> <li>Partner's appraisal of log frames usefulness</li> </ul>	<ul style="list-style-type: none"> <li>semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of data obtained from interviews</li> </ul>
<ul style="list-style-type: none"> <li>Were the risks identified in the project document and PIRs the most important and the risk ratings applied appropriately?</li> </ul>	<ul style="list-style-type: none"> <li>Number of new risks identified and changes in risk ratings</li> </ul>	<ul style="list-style-type: none"> <li>PIR; interviews</li> </ul>	<ul style="list-style-type: none"> <li>Review of PIRs plus interviews</li> </ul>
<ul style="list-style-type: none"> <li>How and to what extent have project implementation process, coordination with participating stakeholders and important aspects affected the timely project start-up, implementation and closure?</li> </ul>	<ul style="list-style-type: none"> <li>Current % delivery rate vs planned at PRODOC level</li> </ul>	<ul style="list-style-type: none"> <li>PRODOC; CDRs; PIRs; semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Desktop PRODOC plus interviews</li> </ul>
<ul style="list-style-type: none"> <li>Do the outcomes developed during the project formulation still represent the best project strategy for achieving the project objectives?</li> </ul>	<ul style="list-style-type: none"> <li>Acceptance of Project strategy by main actors.</li> </ul>	<ul style="list-style-type: none"> <li>Semi-structured interviews and desktop review</li> </ul>	<ul style="list-style-type: none"> <li>Analyze degree of acceptance by different</li> </ul>

			stakeholders interviewed.
<ul style="list-style-type: none"> <li>How have local stakeholders participated in project management and decision-making? What are the strengths and weaknesses of the approach adopted by the project? What could be improved?</li> </ul>	<ul style="list-style-type: none"> <li>Number of Board Meetings and local stakeholders' participation</li> </ul>	<ul style="list-style-type: none"> <li>Steering committee minutes</li> </ul>	<ul style="list-style-type: none"> <li>Review of relevant documents plus interviews.</li> </ul>
<ul style="list-style-type: none"> <li>Does the project consult and make use of skills, experience and knowledge of the appropriate government entities, NGOs, community groups, private sector, local governments and academic institutions in the implementation and evaluation of project activities?</li> </ul>	<ul style="list-style-type: none"> <li>Number of local experts consulted during project implementation</li> </ul>	<ul style="list-style-type: none"> <li>Minutes from meetings</li> </ul>	<ul style="list-style-type: none"> <li>Review minutes of meetings plus interviews.</li> </ul>
<b>Sustainability: To what extent are there financial, institutional, social-economic, and/or environmental risks to sustaining long-term project results?</b>			
<ul style="list-style-type: none"> <li>Was project sustainability strategy mainstreamed into project implementation?</li> </ul>	<ul style="list-style-type: none"> <li>Existence of sustainability strategy on Project Document</li> </ul>	<ul style="list-style-type: none"> <li>Project Document</li> </ul>	<ul style="list-style-type: none"> <li>Review of Project Document</li> </ul>
<ul style="list-style-type: none"> <li>How relevant was the project sustainability strategy?</li> </ul>	<ul style="list-style-type: none"> <li>Perception of sustainability potential by stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Question all stakeholders on project sustainability strategy</li> </ul>
<ul style="list-style-type: none"> <li>Have short-term and persistent environmental risks been assessed?</li> </ul>	<ul style="list-style-type: none"> <li>A revised or validated list of environmental risks</li> </ul>	<ul style="list-style-type: none"> <li>GEF 6 Tracking Tool</li> </ul>	<ul style="list-style-type: none"> <li>Question institutional stakeholders for data taking.</li> <li>Field visit to Hg technology deployment</li> </ul>
<ul style="list-style-type: none"> <li>How have socio-economic risks (Safeguards) been monitored?</li> </ul>	<ul style="list-style-type: none"> <li>Criteria in safeguards discussed.</li> <li>Number of grievances expressed</li> </ul>	<ul style="list-style-type: none"> <li>Safeguards</li> <li>PIRs</li> <li>Minutes from stakeholder meetings</li> </ul>	<ul style="list-style-type: none"> <li>Document review of safeguards</li> </ul>
<ul style="list-style-type: none"> <li>Are there any financial risks that may jeopardize sustenance of project outcomes? What is the likelihood of financial and economic resources not being available once the GEF assistance ends (resources can be from multiple sources, such as the public and private sectors, income generating</li> </ul>	<ul style="list-style-type: none"> <li>Number of financial mechanisms established and operational to facilitate the transition of mercury-free technologies in ASGM</li> </ul>	<ul style="list-style-type: none"> <li>Semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Review of stakeholders' perceptions and data</li> </ul>

activities, and trends that may indicate that it is likely that in future there will be adequate financial resources for sustaining project's outcomes)?			
<ul style="list-style-type: none"> <li>Are there any social or political risks that may jeopardize sustenance of project outcomes? What is the risk that the level of stakeholder ownership will be insufficient to allow for the project outcomes/benefits be sustained? Do the various key stakeholders see that it is in their interest that the project benefits continue to flow? Is there a sufficient public/ stakeholder awareness in support of the long-term objectives of the project?</li> </ul>	<ul style="list-style-type: none"> <li>Number of new identified risks and assessment of existing risks</li> </ul>	<ul style="list-style-type: none"> <li>PIR; semi-structured interviews</li> </ul>	<ul style="list-style-type: none"> <li>Desk top review and interviews</li> </ul>
<b>Impact: Are there indications that the project has contributed to, or enabled progress toward, reduced environmental stress and/or improved ecological status?</b>			
<ul style="list-style-type: none"> <li>How has the project contributed to the reduced environmental stress and/or improved ecological status?</li> </ul>	<ul style="list-style-type: none"> <li>Change in the status of environmental and ecological status indicators</li> </ul>	<ul style="list-style-type: none"> <li>PRODOC results framework; PIR</li> <li>Reduction in Hg in water and tissues. From 35t to 15 tons</li> </ul>	<ul style="list-style-type: none"> <li>Review and comparison of status of all indicators at results framework.</li> <li>Measurements in Hg in Water and tissues at sites with improved equipment installed</li> </ul>
<ul style="list-style-type: none"> <li>Are the project outcomes contributing to national development priorities and plans?</li> </ul>	<ul style="list-style-type: none"> <li>One national policy for responsible ASGM gold mining revised/drafted</li> </ul>	<ul style="list-style-type: none"> <li>PIR</li> <li>Policy in-force?</li> </ul>	<ul style="list-style-type: none"> <li>Review of PIR to determine impact at outcome level.</li> </ul>
<ul style="list-style-type: none"> <li>Is the project adding value to Mercury Free Mined Gold?</li> </ul>	<ul style="list-style-type: none"> <li>Number of chain-of-custody processes, verification mechanisms for gold, and El Dorado Branding Schemes developed and institutionalized</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>

**Semi-structured interview guide for Project stakeholders (Government partners, NGOs, private sector) of the Project “El Dorado Gold Jewellery”**

Date	
Interviewees	
Name	
Position	
Address	
Tel.	
Mail	

**Introduction:**

- ✓ **Thank interviewees / participants for their availability for the interview.**
- ✓ **Brief presentation.**
- ✓ **Brief introduction of the evaluations main objective and how information is going to be obtained.**

The MTR will assess **progress towards the achievement** of the project objectives and outcomes as specified in the Project Document and **assess early signs of project success or failure with the goal of identifying the necessary changes to be made in order to set the project on-track to achieve its intended results.** The MTR will also review the project’s strategy and its risks to sustainability.

- ✓ **Ask if the interviewee has any specific question or doubt before starting the interview.**
- ✓ **Clarify that the information gathered will be strictly confidential.**
- ✓ **Ask if the interviewee gives his/her consent to record the interview; indicate that the interview will be recorded to better capture the information. If the interviewee does not feel comfortable ensure that the interview will not be recorded.**
- ✓ **Mark responses as M or F for Male/Female to disaggregate opinions.**

**Part I: General Information**

1. Please briefly explain the work of your organization and your relationship with the project.

*Note: It is important here to know exactly who we are talking to: Is it a representative of the Government directly involved in the implementation of the project? A representative of another Project collaborating with the Project. A member of an NGO? An Artisan Selling Value Added Merchandise? Depending on the nature of the collaboration, the questions should be adapted to make them more specific.*

*Important information:*

- *What sort of relationship has with the project?*
- *Is there any sort of evidence of the relationship, an agreement perhaps?*

**Part II: Project Strategy**

2. Please briefly explain if you consider that the Project with its main objective (Conservation management objectives & actions for Mercury Free Mining are mainstreamed effectively into the mining, government, agency, and Jewelry Manufacturers and value chain. (Raised awareness; Content, tools and capacity developed and delivered to mainstream the Mercury Free Mining concept; Learning, evaluation, adaptive management, and upscaling) is well aligned and relevant.

(Pay special attention with national Development strategies and nature conservation, etc.)

3. Did you or someone from your unit/organization participate in the project formulation process? Please describe the process

(n/a with certain partners and actors)

4. Do you think that the Project has considered all possible risks?

*Note: [Refine this section or break into separate questions] Reference the identified risks (1. Political unrest and security concerns (H); 2. Strategic, existing reform vehicles don't accept, or chose not to implement technical incentives (M); 3. Recipients of Mercury Free Equipment/ Jewellery makers question technical standard or added value (M); 4. Amendments to legislation & regulations modifications not officially approved (M); 5. Different partners with different priorities making management & administration difficult; 6. Not able to reach consensus on mid- term objectives (M); Project structure seeks consensus or creates bottlenecks which makes implementation challenging (M)).*

5. At your discretion, does the results framework or budget include gender-relevant outputs and activities? Please specify.

6. Do you believe that the results and output indicators are well designed and can be measured?



7. Do you think the project has generated or can generate beneficial development effects for the country/territory or could catalyze them in the future (e.g. income generation, reduction of Mercury effects, clean water, biodiversity conservation, etc.) so that they should be included in the results framework?

**Part III: Progress towards results**

8. To what extent does the Project support your Ministry/Secretariat/Organization in achieving its results? Explain briefly.

9. Does CI (or list partners) have a good system of financial tracking, budgeting, spending, and expense forecasting?

10. What do you think have been the main obstacles to achieving the results? Please explain.

11. What do you think have been the facilitating factors for the achievement of the results? Please explain.

12. Has the project achieved an appropriate partnership strategy, and should any other partners or key players be added to the process? Please explain

13. Is the project providing enough tools to mainstream mercury free mining in the respective territories and with local communities and governments?

14. Do you think your organization has or has received enough training to continue promoting mercury free mining? What else do you need?

15. What staff and budget does your organization have to ensure the continuity of this conservation approach?

16. Do you think the general population is aware? Is the project succeeding in transmitting the importance of reducing mercury? What else can be done?

**Part IV: Project Implementation & adaptive management**

17. Do you think that the structure and organization of the Project are adequate (central office, regional office)? Does the project have enough human and technical equipment and resources to achieve the results?

*Note: If you do not know, ask if you have been informed of changes in the project and if you have been able to influence or transmit concerns to the different coordination bodies*

18. Have there been any substantive changes to the project and has the project been able to adapt to these changes? Were you aware (or informed) of changes before they happened (*if not answered above?*)

19. How has coordination been between actors, between donors? Have the different coordination committees worked? (board of directors, national coordination committee) Can it be improved?

(n/a for certain interviewees)

**FOR GOVERNMENT COUNTERPARTS AND STAKEHOLDERS**

20. Do you think there has been duplication of effort with other projects?

21. Do governments support the project's objectives, and do they have an active role in decision-making?

22. Have the different partners contributed to the co-financing? How is it being followed up?

23. Have you or the organization you represent been involved in monitoring the project? Do you think it has been effective? Can it be improved? Do you know if national data, statistics, nationally generated information are being used?

**FOR STAKEHOLDER ENGAGEMENT NON-GOVERNMENT**

24. Do you think there has been duplication of effort with other projects?

25. Do governments support the project's objectives, and do they have an active role in decision-making?

26. Have you or the organization you represent been involved in making decisions with respect to the project?

27. Have you or the organization you represent been involved in monitoring the project? Do you think it has been effective? Can it be improved? Do you know if national data, statistics, nationally generated information are being used?

28. Have there been any complaints about the project that have been corrected? Or not corrected? If you have an issue, what do you do?

**Part V: Sustainability**

29. Once the Project and the financial support of the GEF is concluded, will the Governments, NGOs partnering with CI be able to continue promoting this initiative and guarantee the advances towards the project objective? How will they cover recurrent costs?

30. Have the Project partners been able to ensure non-GEF resources for operations?

27. Have the different partners contributed to the co-financing? How is it being followed up?

31. Are there new risks to be considered for the sustainability of the project? What measures could be taken to mitigate these risks?

32. Are there institutional changes expected that could create a risk to the project? That could be an asset to the project sustainability?

Do you have anything else you'd like to add?

Thank you very much!

## Annex IV. MTR Ratings

<b>Ratings for Progress Towards Results: (one rating for each outcome and for the objective)</b>		
6	Highly Satisfactory (HS)	The objective/outcome is expected to achieve or exceed all its end-of-project targets, without major shortcomings. The progress towards the objective/outcome can be presented as “good practice”.
5	Satisfactory (S)	The objective/outcome is expected to achieve most of its end-of-project targets, with only minor shortcomings.
4	Moderately Satisfactory (MS)	The objective/outcome is expected to achieve most of its end-of-project targets but with significant shortcomings.
3	Moderately Unsatisfactory (HU)	The objective/outcome is expected to achieve its end-of-project targets with major shortcomings.
2	Unsatisfactory (U)	The objective/outcome is expected not to achieve most of its end-of-project targets.
1	Highly Unsatisfactory (HU)	The objective / outcome has failed to achieve its midterm targets, and is not expected to achieve any of its end-of-project targets.
<b>Ratings for Project Implementation &amp; Adaptive Management: (one overall rating)</b>		
6	Highly Satisfactory (HS)	Implementation of all seven components – management arrangements, work planning, finance and cofinance, project-level monitoring and evaluation systems, stakeholder engagement, reporting, and communications – is leading to efficient and effective project implementation and adaptive management. The project can be presented as “good practice”.
5	Satisfactory (S)	Implementation of most of the seven components is leading to efficient and effective project implementation and adaptive management except for only few that are subject to remedial action.
4	Moderately Satisfactory (MS)	Implementation of some of the seven components is leading to efficient and effective project implementation and adaptive management, with some components requiring remedial actions.
3	Moderately Unsatisfactory (MU)	Implementation of some of the seven components is not leading to efficient and effective project implementation and adaptive, with most components requiring remedial action
2	Unsatisfactory (U)	Implementation of most of the seven components is not leading to efficient and effective project implementation and adaptive management.
1	Highly Unsatisfactory (HU)	Implementation of none of the seven components is leading to efficient and effective project implementation and adaptive management.

<b>Ratings for Sustainability: (one overall rating)</b>		
4	Likely (L)	Negligible risks to sustainability, with key outcomes on track to be achieved by the project’s closure and expected to continue into the foreseeable future
3	Moderately Likely (ML)	Moderate risks, but expectations that at least some outcomes will be sustained due to the progress towards results on outcomes at the Midterm Review
2	Moderately Unlikely (MU)	Significant risk that key outcomes will not carry on after project closure, although some outputs and activities should carry on
1	Unlikely (U)	Severe risks that project outcomes as well as key outputs will not be sustained

Annex V. MTR Workplan

MAIN ACTIVITIES: Note, deliverables in boldface	January				February				March			
	S1	S2	S3	S4	S1	S2	S3	S4	S1	S2	S3	S4
<b>DOCUMENT REVIEW</b>												
<b>Workplan</b>												
Desk top review, regional context and bibliographic techniques of relevance.												
Identification of stakeholders												
Identification of tools to collect information												
Inception Workshop												
<b>Delivery of Inception Report (Includes evaluation matrix and workplan + agenda)</b>												
Revision of inception report												
Inclusion of recommendations												
Final approval												
Design of evaluation tools												
<b>VIRTUAL FIELD WORK AGENDA</b>												
Conduct virtual focal group meetings												
Conduct virtual interviews												
Analysis of the interviews, summary of main achievements related to the evaluation scope, triangulation of information.												
Online Presentation of main findings to CI												
<b>EVALUATION REPORT PREPARATION PHASE.</b>												
Analysis of all field interviews and documents and download it to draft evaluation report												
Evidence identification by triangulating data sources												
<b>Delivery draft report</b>												
Report revision by Evaluation reference group												
<b>Final delivery including comments received by evaluation reference group</b>												
<b>Incorporation of final comments and delivery</b>												
Final approval.												

## Annex VI. List of interviewed stakeholders

### Semi-structured Interviews: 10-16 February

CI and Representative Stakeholders from components, safeguards, and project management perspectives:

Objective:

- Gauge levels of inputs.
- Obtain multiple perspectives on project execution.
- Listen to Gains, Concerns, Opportunities, and Risks.
- Determine the need for additional evaluation tools to triangulate information.
- Identify inputs for going forward to the next stage of project implementation.

Wednesday 10 February		
Time (Guy)	Participants	Position
11:30am - 12:30pm	Ms. Odessa Duncan	Snr. Environmental Officer, Environmental Protection Agency and GEF Technical Focal Point (Guyana)
6:00-7:00 pm	Mr. Dayshawn Billingy	Technical Officer, GEF GOLD, Conservation International – Guyana
Thursday 11 February		
8:00-9:00am	Ms. Ingrid Sarabo	Project Director, GEF GOLD, Conservation International- Guyana
9:00-10:00am	Ms. Diane McDonald	Deputy Commissioner, Guyana Geology & Mines Commission/ Project Steering Committee Member
	Mr. Lloyd Badoo	Mineral Processing Engineer, Guyana Geology & Mines Commission/ Project Steering Committee Member
11:00am-12:00	Mr. Damian Fernandes	Executive Director, Conservation International – Guyana
2:00-3:00 pm	Ms. Ashanta Osbourne	Consultant, Gender and Social Analysis
6:00-7:00 pm	Ms. Trudy Abrahams	Consultant, Communications Strategy
Friday 12 February		
8:00-9:00 am	Ms. Jaime Revenaz Webbe	Consultant (CIRDI), Financing Mechanism
9:00-10:00am	Ms. Kazia Watson	Safeguards Coordinator, GEFGOLD, Conservation International – Guyana
	Ms. Kristia Ramlagan	Communications Coordinator, GEFGOLD, Conservation International – Guyana
10:00-11:00am	Mr. Curtis Bernard	Senior Technical Director, Conservation International – Guyana
11:00am-12:00	Mr. Conrad St. Romain	Medium-scale Miner, Region 1



2:00-3:00pm	Ms. Susan Keane	Senior Director, Global Advocacy, International Program, Natural Resources Defense Council (Related to Planet Gold Program)
Saturday 13 February		
9:00-10:00am	Mr. Compton Wordsworth	Small-scale Miner, Region 8
11:00am-12:00	Mr. Christopher Persaud	Small Scale Miner, Region 4
1:00-2:00 pm	Ms. Cheryl Williams	President; National Mining Syndicate (Medium Scale Miner, Region 7)
Sunday 14 February		
1:00-2:00 pm	Deain Gordon	Small Scale Miner, Region 8
Monday 15 February		
9:00-10:00 am	Ms. Donna Charles	Member, Guyana Women Miners Organization; Project Steering Committee Member
10:00-11:00 am	Mr. Colis Primo Mr. Surujpaul Singh	Snr. Environmental Officer, Environmental Protection Agency, Project Steering Committee Member Environmental Officer II, Environmental Protection Agency, Project Steering Committee Member (alternate)
11:00am-12:00	Ms. Lisa Foster	Partner Relations Coordinator; Conservation International-Guyana
2:00-3:00 pm	Ms. Mariscia Charles	Technical Officer; Ministry of Natural Resources, Project Steering Committee Member
3:00 – 4:00pm	Mr. Ian Kissoon	Director, Environmental and Social Framework, Conservation International – GEF
Tuesday 16 February		
9:00-10:00am	Mr. Rene Edwards	Director - Field Implementation; Conservation International-Guyana
10:00-11:00am	Mr. Lancelot France-Cummings	Operations Director; Conservation International-Guyana
11:00am-12:00	Mr. Terah Dejong	Consultant, Monitoring & Evaluation
2:00-3:00pm	Ms. Jude DaSilva	Executive Director; National Toshias Council; Project Steering Committee Member
3:00-4:00 pm	Mr. Andron Alphonso	President; Guyana Gold & Diamond Miners Association
	Mr. Avalon Jagnandan	Executive Director; Guyana Gold & Diamond Miners Association
TBD	Ms. Daniela Carrion	Regional Technical Advisor for Latin America; Conservation International – GEF

Annex VII. Checklist of Documents Reviewed

Number	Documents Sought	Documents Reviewed
1	CI GEF Project Approval Documents	9713 El Dorado Project Document Endorsed
2	Project Implementation Reports	Project Implementation Report FY19 Project Implementation Report FY20 Note: No PIR for FY18
3	Inception Report	Field Visit, Inception and Planning 3-7Sept2018
4	Quarterly Technical Reports	FY19 Q1 Technical Report_20181210 FY19 Q2 Technical Report_20190225 FY19 Q3 Technical Report_20190606 FY19 Q4 Technical Report_20190731 FY20 Q1 Technical Report_20191114 FY20 Q2 Technical Report_20200903 FY20 Q3 Technical Report_20200602 FY20 Q4 Technical Report_20200911 FY21 Q1 Technical Report_20201117
5	Quarterly Financial Reports	FY19 Q1 ITD Financial Report FY19 Q2 ITD Financial Report FY19 Q3 ITD Financial Report FY20 Q1 ITD Financial Report FY20 Q2 ITD Financial Report FY20 Q3 ITD Financial Report FY20 Q4 ITD Financial Report FY21 Q1 ITD Financial Report
66	Project Steering Committee Meetings	PSC Meeting 1 20161005 PSC Meeting 2 20161110 PSC Meeting 3 20170110 PSC Meeting 4 20170214 PSC Meeting 5 20170328 PSC Meeting 6 20170530 PSC Meeting 7 20180327 PSC Meeting 8 20190301 PSC Meeting 9 20190711 PSC Meeting 10 20191101

		PSC Meeting 11 20200714
7	Consultant Reports	Gender and Social Analysis 30.04.2020
		MF Mining Gaps Analysis 26.04.2019
		M+E Framework RMP Sept 2020
8	Special Reports	Report on tech. round table -Follow-up meeting
		Round Table Report - Final
9	GEF 6 Tracking tool	
10	Related GEF Projects	
11	9602 Planet Gold	9602 Planet Gold Project Document Endorsed
		9602 GEF Review Sheet 2016-09-29
		9602 STAP Review 2016-09-30
12	5846 Biodiversity Protection Mining Sector	5846 UNDP Project Document
13	6939 Minamata Initial Assessment	6939 GEF UNDP Project Document
14	Minamata Documents	Minamata Convention
		Minamata Initial Assessment Report Guyana

Annex VIII. Co-financing Table

GEF AGENCY FINANCIAL REPORT SUMMARY										
1001085: A GEF GOLD Supply Chain Approach to Eliminating Mercury in Guyana's AGSM Sector										
COFINANCING										
List each donor separately										
#	Source*	Type** see list below	Name of Co-financier***	Total proposed co-financing (ProDoc) USD (A)	Amount Contributed during previous Fiscal Year(s) (B)	Amount Contributed During Current Fiscal Year (C)	Amount Contributed To Date ITD (B+C) USD (D)	Balance (A-D) USD	Percent Materialized (D/A)	Remarks
1	Donor Agency	Grant	Norwegian Agency for Development Cooperation (Norad)	\$ 2,000,000	635,695	519,072	1,154,767	845,233	58%	<a href="#">Letter of support</a>
2	Recipient Government	In-kind	Government of Guyana	\$ 649,600	99,033	40,800	139,833	509,767	22%	<a href="#">Letter of support</a>
3	Beneficiaries	In-kind	WWF-Guianas	\$ 487,000			0	487,000	0%	-
4										-
5										-
6										-
7										-
8										-
9										-
10										-
<b>Cofinancing Totals:</b>				<b>3,136,600</b>	<b>734,728</b>	<b>559,872</b>	<b>1,294,600</b>	<b>1,842,000</b>	<b>41%</b>	<b>-</b>

Source\* GEF Agency, Recipient Government, Donor Agency, CSO, Private Sector, Beneficiaries, Other

Type\*\* Grant, Loan, Equity, Guarantee, In-kind

Name of Co-financier\*\*\* Please provide documentation for confirmation of materialization

Source: CI Guyana. 2021. Financial Report for 2<sup>nd</sup> Quarter Fiscal Year 2021.

## Annex IX: Revised Project Results Framework

### Revised Project Results Framework approved CI-GEF June 2020.

<b>Objective:</b>	To assist Guyana with converting to mercury-free mining by 2025 by directly involving business enterprises with a profit motive for leading the shift in the development of a mercury-free ASGM supply chain and downstream El Dorado brand jewelry.		
<b>Indicator(s):</b>	<p>a. Number of tons of Mercury reduced by end of project.</p> <p>b. Number of Regions in Guyana in which mercury-free technologies have replaced the use of mercury in ASGM.</p> <p>c. Number of financial mechanisms established and operational to facilitate the transition of mercury-free technologies in ASGM.</p> <p>d. Number of chain-of-custody processes, verification mechanisms for gold, and El Dorado Branding Schemes developed and institutionalized.</p> <p>e. Number of national polices and requisite laws/regulations in support of responsible gold production and value added in the gold commodity chain refined/drafted.</p>		
Expected Outcomes and Indicators	Project Baseline	End of Project Target	Expected Outputs and Indicators
<b>Component 1: Appropriate mercury-free technologies mainstreamed in Guyana’s ASGM sector</b>			
<p><b>Outcome 1.:</b></p> <p>By the end of the project, demonstrations established and mercury-free technology transferred.</p> <p><b>Indicator 1.1:</b></p> <p>Number of regions in Guyana where mercury-free technology has replaced the use of mercury in the ASGM sector</p> <p><b>Indicator 1.2:</b></p> <p>Number of tons of Mercury reduced</p>	<p>1.No mercury-free technology in use in the ASGM sector in the country.</p> <p>1. 35.92 metric tons of mercury being used (based on a mercury flow approach estimate)</p>	<p>1. Mercury-free technologies have replaced the use of mercury in at least one region of Guyana.</p> <p>2. Reduction in mercury use of about 15 metric tons</p>	<p><b>Output 1.1.:</b></p> <p>Two sites for demonstrating mercury-free practices and technologies are established and functional.</p> <p><b>Indicator 1.1.1:</b></p> <p>Number of sites demonstrating mercury-free practices and technologies established and functional.</p> <p><b>Target 1.1.1:</b></p> <p>Two (2) sites demonstrating mercury-free practices. and technologies.</p> <p><b>Output 1.2.:</b></p> <p>Verifiably Mercury-free gold is produced from at least one demonstration site.</p> <p><b>Indicator 1.2.1:</b></p> <p>Number of ounces of verified mercury-free gold produced at demonstration sites.</p> <p><b>Target 1.2.1:</b></p> <p>[NUMBER IN WORDS] ([X]) ounces of verified mercury free gold produced at the project demonstration site.</p> <p><b>Output.1.3.:</b></p> <p>Miners exposed to demonstrations of Mercury-free gold mining practices and technologies in Regions 1, 7 and 8.</p> <p><b>Indicator 1.3.1:</b></p> <p>Number of mercury-free gold mining technologies identified, tested and adopted.</p> <p><b>Target 1.3.1:</b> At least four (4) mercury-free technologies tested in field conditions.</p> <p><b>Indicator 1.3.2:</b></p> <p>Number of Technology Innovation clinics organized with miners, fabricators, and equipment retailers.</p> <p><b>Target 1.3.2:</b></p> <p>At least six (6) Technology Innovation Clinics organized with miners, fabricators, and equipment retailers to test and select suitable equipment for two sites.</p>
<b>Component 2: Mechanism for financing capital investments for Mercury-free technologies established and functional</b>			

<p><b>Outcome 2.:</b> By the end of the project, a financial mechanism for capital investments for mercury-free technologies is established and functioning.</p> <p><b>Indicator 2.1:</b> Number of financial mechanisms established and operational to facilitate the transition of mercury-free technologies in ASGM</p> <p><b>Indicator 2.2.</b> Amount of finance approved by financing mechanism(s) to miners.</p> <p><b>Indicator 2.3:</b> Number of miners successfully accessing financing for mercury-free mining equipment.</p>	<p>No funds available to ASGM through a dedicated mechanism</p> <p>No technology established nor finance approved through financial mechanism(s) to miners.</p> <p>No miners successfully accessing finance for mercury-free mining equipment.</p>	<p>Amount (\$) made available to ASGM through financing mechanism</p> <p>Mercury-free technologies will be established and operational and [AMOUNT IN WORDS] dollars. approved through [AMOUNT IN WORDS] miners successfully accessing finance for mercury-free mining equipment.</p>	<p><b>Output 2.1.:</b> An assessment of financing mechanisms for artisanal, small-scale, and medium-scale miners to adopt mercury-free technologies is undertaken.</p> <p><b>Indicator 2.1.1:</b> Number of feasibility assessments completed on mechanisms for financing technologies appropriate to Guyana based on mechanisms tested around the world.</p> <p><b>Target 2.1.1:</b> One (1) feasibility assessment completed on mechanisms for financing technologies appropriate for Guyana.</p> <p><b>Output 2.2.:</b> A financial mechanism for the procurement of mercury-free gold mining technology is established and functional.</p> <p><b>Indicator 2.2.1:</b> Number of long-term financing mechanisms for mercury-free technology established and functional to access credit and financing for producers in model sites to be able to convert to non-mercury technology.</p> <p><b>Target 2.2.1:</b> One long-term financing mechanism for mercury-free technology established and functioning.</p> <p><b>Indicator 2.2.2:</b> Number of miners applying to the financing mechanism to support their transition to Hg-free operations.</p> <p><b>Target 2.2.2:</b> [Amount] of miners submitting applications to the financing mechanism established for procurement of new technologies.</p>
<p><b>Component 3:</b> Markets established for branded mercury- free gold from Guyana</p>			

<p><b>Outcome 3.:</b></p> <p>By the end of the project, a chain of custody process, verification mechanism for gold and, an El Dorado branding scheme is developed and institutionalized.</p> <p><b>Indicator 3.1:</b></p> <p>Number of chain-of-custody processes, verification mechanisms for gold, and El Dorado branding schemes developed and institutionalized.</p>	<p>Zero (0) chain of custody process verification mechanism and an El Dorado Green Gold Branding Scheme.</p>	<p>The branding of El Dorado Gold has been shown to result in increased gold sales and revenues to artisanal and small-scale miners in Guyana.</p>	<p><b>Output 3.1.:</b></p> <p>Social and environmental standards, a chain of custody process, and a verification mechanism for El Dorado Gold, linked to the GEF Gold brand, is developed and institutionalized.</p> <p><b>Indicator 3.1.1:</b></p> <p>Number of chain-of-custody process verification mechanism for gold produced on model sites developed and an El Dorado Green Gold branding scheme developed that is linked to the GEF GOLD Brand.</p> <p><b>Target 3.1.1:</b></p> <p>One (1) chain of custody process verification mechanism and an El Dorado Green Gold branding scheme.</p> <p><b>Output 3.2:</b></p> <p>El Dorado producers are linked to international responsibly produced gold markets.</p> <p><b>Indicator 3.2.1:</b></p> <p>Number of market systems analyses and feasibility studies for the establishment an institutional mechanism to trade El Dorado-branded gold.</p>
---	--	--	---

			<b>Target 3.2.1:</b> One (1) market systems analysis and feasibility study for an institutional mechanism.
<b>Component 4: National policies and incentives for mercury-free gold established</b>			
<p><b>Outcome 4.:</b></p> <p>By the end of the project, a national policy on responsible gold production and value added and requisite laws/regulations are refined/drafted to support a responsible gold commodity chain.</p> <p><b>Indicator 4.1:</b></p> <p>Number of national policies and requisite laws/regulations in support of responsible gold production and value added in the</p>	<p>Zero (0) national policy on responsible gold production and value added along the gold commodity chain.</p>	<p>At least one (1) national policy and attendant requisite laws/regulations in support of responsible gold production and value added in the gold commodity chain revised/drafted.</p>	<p><b>Output 4.1.:</b></p> <p>Multi-stakeholder fora convened to provide input for the revision/drafting of a national policy for responsible ASGM gold mining and capacity built to ensure compliance with mining policy.</p> <p><b>Indicator 4.1.1:</b></p> <p>Number of multi-stakeholder policy focused fora convened.</p> <p><b>Target 4.1.1:</b></p> <p>[NUMBER IN WORDS] ([X]) multi-stakeholder policy focused fora convened by project.</p> <p><b>Indicator 4.1.2:</b></p> <p>Number of multi-stakeholder coordination mechanism to provide policy and programme advisory services for the long-term adoption of mercury-free gold mining technologies established.</p> <p><b>Target 4.1.2:</b></p> <p>One (1) multi-stakeholder coordination mechanism for long-term adoption of mercury free gold mining technologies.</p> <p><b>Indicator 4.1.3:</b></p> <p>Number of national policies for responsible ASGM gold mining revised/drafted.</p> <p><b>Target 4.1.3:</b></p> <p>One (1) national policy for responsible ASGM gold mining revised/drafted.</p>
<b>Component 5: Monitoring and Evaluation</b>			
<p><b>Outcome 5.:</b></p> <p>By the end of the project, national capacity for the monitoring of the use of mercury in the gold mining established and strengthened.</p> <p><b>Indicator 5.1:</b></p> <p>Number of national mercury monitoring mechanisms operational.</p>	<p>Zero (0) M&amp;E programme for instituting mercury-free gold mining.</p>	<p>A mechanism for monitoring the use of mercury in gold mining is institutionalized within the appropriate agencies.</p>	<p><b>Output 5.1.:</b></p> <p>A monitoring and evaluation programme for adaptive collaborative management for instituting mercury free mining instituted.</p> <p><b>Indicator 5.1.1:</b></p> <p>Number of M&amp;E programme for instituting mercury-free gold mining established.</p> <p><b>Target 5.1.1:</b></p> <p>One (1) M&amp;E programme for instituting mercury-free gold mining.</p>
<b>Component 6: Communications and Knowledge Management</b>			
<p><b>Outcome 6.:</b></p> <p>A strategic communication plan and materials targeting key stakeholders, including miners, decision makers, and other local and international actors within the supply chain for awareness raising and policy advocacy are developed and implemented.</p> <p><b>Indicator 6.1:</b> Number of strategic communication plans and materials (e.g. policy papers, factsheets, videos, etc.) aimed at key stakeholders, including miners, decision-makers, and other actors within the supply chain for</p>	<p>Zero (0) education and awareness plans targeted at policy makers, mining and indigenous communities, and other key stakeholders on responsible gold mining in Guyana.</p>	<p>Twenty (20) strategic plans and awareness materials targeted at policy makers, mining and indigenous communities, and other key stakeholders on responsible gold mining in Guyana.</p>	<p><b>Output 6.1.:</b></p> <p>A strategic communication plan prepared and implemented, and materials prepared (e.g. policy papers, factsheets, videos) aimed at key stakeholders, including miners, decisionmakers, and other local and international actors within the supply chain for awareness raising and policy advocacy.</p> <p><b>Indicator 6.1.1:</b></p> <p>Number of strategic communications plans aimed at key stakeholders, within the ASGM supply chain for awareness raising, policy advocacy developed and implemented.</p> <p><b>Target 6.1.1:</b></p>



<p>awareness raising and policy advocacy developed.</p>			<p>One (1) strategic and communications plan aimed at key stakeholders, within the ASGM supply chain for awareness raising, policy advocacy developed and implemented.</p> <p><b>Output 6.2.:</b> Biennial conference and annual dialogues organized to promote Project Findings and Responsible Gold Mining.</p> <p><b>Indicator 6.2.1:</b> Number of education awareness material and activities to promote mercury- free gold mining technology nationally prepared and published.</p> <p><b>Target 6.2.1:</b> One (1) fully funded education awareness program to promote mercury-free gold mining technology.</p> <p><b>Output 6.3.:</b> Coordination with the global project on Knowledge Management activities.</p> <p><b>Indicator 6.3.1:</b> Number of documented lessons learned made available to the knowledge management platform within the UNEP Global Mercury Partnership.</p> <p><b>Target 6.3.1:</b> At least one (1) documented lesson learned made available to the knowledge management platform of the UN Environment Global Mercury Partnership.</p> <p><b>Output 6.4.:</b> Education and awareness on options and benefits of responsible gold production and education targeting policymakers to build national commitment to a sustainable responsible gold value chain in Guyana.</p> <p><b>Indicator 6.4.1:</b> Number of education and awareness plans targeting policymakers and mining communities on benefits of responsible gold production gold value chain in Guyana.</p> <p><b>Target 6.4.1:</b> One (1) fully funded education awareness plan targeting policymakers and mining communities builds commitments on benefits of responsible gold production gold value chain in Guyana</p>
---	--	--	---

## Annex X. Safeguard Screening Form

The following Safeguard Screening form from Project Document as approved for CEO Endorsement.

Safeguard Triggered	Triggered (yes/no)	Justification
1. Environmental and Social Impact Assessment (ESIA)	No	The safeguard screening review determined that the project's activities will have no significant adverse environmental and social impacts that are sensitive, diverse, or unprecedented.
2. Natural Habitats	No	The safeguard screening review determined that the project is not proposing to alter natural habitats.
3. Involuntary Resettlement	No	The project is not proposing restriction of access/use of natural resources.
4. Indigenous Peoples	Yes	<p>The project does plan to work in lands or territories traditionally owned, customarily used, or occupied by indigenous peoples. The project proposes to work in at least one indigenous community that is involved in mining, but the specific community will be chosen in the project design phase through an objective criteria-driven selection process that will identify a shortlist of places. After this process is completed, the shortlisted communities will be consulted using CI's rights-based approach for working with indigenous and local communities prior to final selection. Within the chosen community(ies), the project will seek to test the use of non-mercury mining technologies and other measures to address the social and environmental impact of mining on the community. The project would therefore interface primarily with members of the community involved in mining but also include interaction with the community to assess and address the wider impacts of mining on the community. Women's and men's roles will be promoted during implementation of project activities to reinforce the important experiences and roles of both. The project complements CI-Guyana avoided deforestation project funded by NORAD in which sustainable landscape plans (integrated natural resource management plans) will be developed. By design, these plans require building a multi-stakeholder process to design and implement initiatives.</p> <p>CI-Guyana implements CI's Rights Based Approach in their engagement with stakeholders, especially indigenous communities. In the implementation of this project, full understanding of the community demographics and social stratification will be engendered, and representation of all identified subgroups in engagements will be secured. CI-Guyana's protocols and processes for engaging indigenous communities are well-established and tested. The project will ensure that the chosen community(ies) fully understand the details and implications of the project and are able to consent to their participation in the project.</p>

		<p>CI-Guyana has valuable networks and is cognizant of political and social dynamics that may exist within traditional governance structures that must be acknowledged and managed to effectively engage with communities. This includes awareness of the fact that village leadership is not always representative of the views of the entire community. This will necessitate a robust and inclusive process to obtain FPIC to the project that ensure that the views of all are taken into consideration, including those sub-groups traditionally marginalized. Even as FPIC is obtained, efforts must be made to ensure that any potential harm that may be caused during implementation of the project (risks) are identified and measures to avoid, reduce, or mitigate these are developed.</p> <p>Previous experience working within indigenous communities (with both men and women) and conducting post-evaluations have yielded valuable insights and lessons for this project (e.g., on the importance of translation services, culturally sensitive communications materials, etc.). These will help to shape the project’s strategy and plan for engaging with indigenous peoples. Our approach to consultation will respect FPIC and thus be culturally sensitive. This means that communities will have the opportunity to negotiate how they would like to participate in, and benefit from the project. The social baseline assessments to be done under the NORAD-funded project plus the one under this project will also inform the design of project activities that provide culturally appropriate benefits for Indigenous Peoples. The project governance mechanism will include indigenous institutions that will represent the interests of their constituents at a higher level of project planning, implementation, and oversight to ensure fair and appropriate benefits.</p> <p>The NTC will participate on a project steering committee which will provide oversight for the project design and implementation. During the PPG phase, the NTC and other indigenous institutions will be engaged to participate in developing the full proposal and a stakeholder engagement plan will be designed and implemented during the project to ensure participatory decision-making.</p>
5. Pest Management	No	There are no proposed activities related to pest management.
6. Physical & Cultural Resources	No	There are no proposed activities related to physical and cultural activities.

<p>7. Stakeholder Engagement</p>	<p>Yes</p>	<p>Environment, the EPA and the GGMC proposed that the GEF GOLD project also be overseen by the PSC with the request that for this project that the EPA participates as a member of the PSC.</p> <p>The GGDMA has already been engaged and has provided guidance on the elaboration of the project concept. It will collaborate to ensure complementarity between this project and the ADoD project to address mining’s role in deforestation in Guyana, a project that also focuses on improving technologies, focusing on the private sector, reducing pressures on forests, biodiversity and ecosystems, and establishing financial and technical support mechanisms for small and medium scale miners. This project is intended to support the GGDMA to expand its reach to include smaller scale operations with less upfront capital to invest in better technologies.</p> <p>The <b>GWMO</b>: The GWMO has been briefed on the concept. They will be further engaged to better understand the realities facing men and women in the ASGM sector, how they are similarly and dissimilarly impacted by mercury, and their roles in effective management of mercury within the sector. Engaging with the GWMO will also allow the project to identify gaps in understanding and prioritize any gender analyses necessary for designing equitable measures for addressing mercury. Engagement with the GWMO is also essential to support the institution’s legitimacy within the sector and to reaffirm the importance of ensuring gender dynamics are well understood and addressed. Under the NORAD-funded project, a gender analysis will be conducted and close collaboration with the GWMO is critical. This gender analysis will inform the interventions of this project.</p> <p>The GWMO focuses on the mining sector from both an economic and from a social perspective. The Organization sits on the PSC of the ADoD project and will be essential to ensuring the project is planned and implemented to result in net contributions to economic and social growth. The organization will represent the interests of miners, especially women miners, and women indirectly associated with the sector to ensure the project is sensitive to gender considerations.</p> <p>The <b>GGMC</b>: The GGMC was engaged as the agency critical to the formulation of a national policy and regulatory framework to support sustainably sourced gold. The implementation of the project will be through a public-private partnership between CI, the GGDMA, and the GGMC. The GGMC is a government agency under the MNR. They sit on the PSC of the ADoD project.</p> <p>The <b>NTC</b>: The NTC comprises elected Indigenous leaders across Guyana’s ten regions. The NTC also sits on the PSC of the ADoD project. They have been engaged on the project and have</p>
----------------------------------	------------	--

		<p>indicated their interest in contributing to ensure that the project represents their constituency’s critical interests. A strong relationship will provide learning opportunities for NTC leadership and foster a link between Indigenous Peoples and miners to create a more collaborative approach to resolving resource-based conflicts, promoting Guyana’s sustainable development agenda, and engendering shared understanding and support for improving national policy.</p> <p>The <b>MNR</b>: The MNR is responsible for coordination, policy formulation, and overall oversight for the natural resources sector. They have been briefed on the project concept and contributed to its submission to the GEF Council. They were further engaged to ascertain their role in the PPG Phase.</p>
--	--	---

<p>8. Gender mainstreaming</p>	<p>Yes</p>	<p>The project is required to mainstream gender at all levels. The project will seek to fairly benefit men and women and seek to mitigate any negative impacts on them. Specifically, it will seek to understand the role of women and other often marginalized groups, such as children and Indigenous Peoples. A gender analysis conducted under the NORAD-funded project will detail the social roles of men and women and the existing power, class, ethnic relations between and amongst them, establish baseline information, and inform this project. This project will support more detailed gender analyses required and pay close attention to the recent work of UNICEF in Guyana that focused on children and impacts of mercury. The purpose of the gender analysis and the integration of knowledge from UNICEF, the GWMO, and others is to (1) understand how impacts vary between men and women (2) ensure the project designs appropriate measures that address both men and women’s roles in management of mercury, (3) ensure that gender differences are well understood and communicated as part of the awareness raising component of the project, and (4) design a gender mainstreaming plan (GMP) with a monitoring and evaluation mechanism.</p> <p>During the PPG phase, appropriate representation of men and women as well as organizations representing women and men within the sector in stakeholder engagement activities was sought.</p> <p>The GWMO will participate on the PSC, having direct experience working on gender issues within the sector. They will participate in the overall planning, implementation, oversight, and monitoring of the project.</p> <p>The EA will ensure that the project team is aware of the gender policy (and other relevant policies), design a GMP, and seek to institutionalize its implementation throughout the project across all partners. The plan will include actions that will yield fair and desired benefits to both men and women and avoid, minimize, mitigate, or offset any harm caused as appropriate. This may require drawing on gender expertise outside of the project team to develop and/or review the plan and the monitoring and evaluation of the same.</p> <p>The project in fact endeavors to ensure the rights of men and women are upheld within the sector. The gender analysis conducted will assess the risk of human rights infringement and serve as the basis for designing the GMP.</p> <p>Article 25 of the Universal Declaration of Human Rights states that  “everyone has the right to a standard of living adequate for the health and well-being of himself and of his family”. This project aims to improve livelihoods through enhanced efficiency of the</p>
--------------------------------	------------	---

		<p>mining sector. Producing responsible gold will enhance profits through enabling access to higher-value markets.</p> <p>In designing interventions that benefit both men and women and enable equitable access to benefits from projects, the empowerment of women can sometimes lead to conflicts between men and women.</p>
--	--	---

Annex XI. Summary Table of Findings, Conclusions, and Recommendations

Findings, Conclusions and Recommendations

Finding	Conclusion	Recommendation
Project Justification/Context		
1: (Relevance/Conformity) Clearly, all partners are gravitating towards the Minamata process, which presents an opportunity and a step forward in the policy landscape. (pg.47)		
2. (Relevance/conformity) The project is in-line with the relevant national policies and priorities, the GEF Chemical and Waste Focal Area (pg.47)	The Project conforms to all national, sector and GEF policies and directives. The project assists to making operational the Minamata process.	
3: The socioeconomics that drive the decision-making process of the Artisan producer constitute a significant gap in the understanding of the economics of the status quo. (pg.47)		
4: There is no data that enables an understanding of how much mercury will be reduced in the ASGM sector. The conversion information is not readily available. How many grams of Hg is needed to produce a gram of Au? (pg.47)	There is also a significant gap in the baseline understanding of their production process and is important in knowing how much mercury is avoided through mercury free production practices and will be discussed further in the discussion of Component 1 below	A control must be established as part of the demo activities with parameters for throughput, output, and Hg reductions. With the information garnered calculate the OPEX and investment profile for future financing.
5: All producers interviewed indicated that they are open to technology if they can see that it will work and save them money. They must see for themselves that it works and produces an acceptable yield before they accept it. (pg.48)	<p>There are elements of the baseline that were not understood or signaled as significant to the development of the project. These are:</p> <ul style="list-style-type: none"> <li>• The economic decision-making of artisan miners who are mobile (non-sedentary)</li> <li>• The amount of Hg applied per gram of gold produced.</li> <li>• Attitudes of the producers towards adopting/rejecting technology.</li> </ul>	Consciously update the baseline through measurement of these items through a survey and through trials with control groups for Hg. Capture the information as part of the development of the site plans and installation of demonstration areas in Component 1 and through the Monitoring System in Component 5.
Project Strategy and Theory of Change		
6: No results from testing on the suggested equipment was provided in the baseline. There is	The project strategy assumes that the available technology will produce an acceptable outcome for ASGM producers within the socio-economic	Test the assumption that the available technology will produce an acceptable outcome for ASGM producers within the socio-economic and



Finding	Conclusion	Recommendation
<p>no knowledge of the yield of the equipment per ton of material processed.</p> <p>It is an assumption that the available technology will produce an attractive outcome for ASGM producers within the socio-economic and technological variables that could surface in demo areas. It is a killer assumption: high impact; high likelihood with a high consequence to the long-term program to address Mercury in Guyana’s ecosystems. The demos will be critical to proving the applicability of the proposed technology given the characteristics of the ore body in regions 7 and 8 with validated yield information. (pg.48)</p>	<p>and technological variables that could surface in demo areas. It is a killer assumption: high impact; high likelihood and a high consequence to the long-term program to address Mercury in Guyana’s ecosystems</p>	<p>technological variables that could surface in demo areas in promoting the demos, focus the C1 demos on understanding the efficiency of the equipment and the yield. Create conditions for no-risk experimentation by miners (see recommendation below). Provide a technician to accompany the demos 100% of the time to measure the variables and assure the variables are produce of equipment correctly deployed and utilized according to specifications.</p>
<p>7: The GEF Project Document did not have a Theory of Change. The TOC is important to align the project architecture to the project context. Essentially, it is the conceptual bridge between both. It is essential for the Minamata process and for Implementing Agencies to align all projects around a viable TOC. The alternate TOC presented does not go to the heart of the issues related to producers. They are willing to try new things to capture more gold. (pg.49)</p>	<p>The TOC suggested (Dejong 2020) does not go to the root of the production culture of the ASG Miners. The miners are more interested in a refined production process which will yield more Au and lower cost of inputs (Hg) The TOC has two interlinked hypotheses: (a) improved production technology will yield more gold with no mercury and (b) miners will make more through a branded market scheme.</p>	<p>Review the suggested TOC with partners to make sure the messaging and focus of the components matches the expectations of the beneficiaries.</p>
	<p>When the TOC is given clarity, the suite of components, outcomes and outputs will eventually contribute to the objective. Therefore, the project correctly embraces all the elements necessary to reduce the barriers over the long term</p>	
Project Design		

Finding	Conclusion	Recommendation
8: The Results Framework is overly dependent on Component 1, which therefore becomes a pre-requisite for Components 2 (financing), 3 (Branding and marketing) and 5 (monitoring). (pg.50)	The project contains all necessary outcomes. The highly interrelated nature of the components amplifies an internal risk. A failure in Component 1 becomes an obstacle to the success of the other components.	Do not redesign components. Consider changing the <u>approach</u> or focus of each component (See recommendations per component) to effectively delink them in the eyes of the beneficiaries.
9: Indicator 1.2.1 The Outcome 5.1 does not match the purpose and scope of its singular output 5.1.1. An adjustment in language is necessary (Irrelevant construction). Appropriate language by Dejong, 2020 suggests focuses on production outputs. (pg.52).	The findings of Dejong, 2020 to focus output indicators better on production is validated. Adjustments to Indicators 1.2.1., 2.2.2., 4.1.1. and Output 5.1. are necessarily See Table 3 or Annex 9.	An adjustment of the language of logframe indicators 1.2.1., 12.2.2., 4.1.1., and output 5.1 is necessary to correct irrelevant constructions. Correct Language per Table 3 or as presented in Annex IX:
10: The reports and consultancies related to the multiple-stakeholder Round Table Discussions have produced information critical to the analysis of the TOC and Project Design. held by the Sector agencies and the PMU have been very successful in engaging stakeholders and building trust.	The multiple-stakeholder Round Table Discussions held by the Sector agencies and the PMU have been highly successful in engaging stakeholders and building trust	
<b>Component 1</b>		
11: A significant amount of time and effort has been expended in evaluating the ore body.	With respect to Component 1, the time and effort for evaluating the ore body was significantly underestimated. Site plans based on Initial grab samples, full prospecting, and determination of type of technology should be treated as an output and given immediate and high priority. Possibly, this should have been a PPG activity.	Successful implementation will require that the entire organization strategically deploy all of their professionals' assets in the project to Region 8. This involves an all-hands approach between Mining technicians, safeguards, gender, communications, etc. from CI-G and from partner organizations.
	Given the positive trend in the rankings presented and given the partial re-opening in Guyana, it is concluded that it is possible to achieve the outputs as stated.	
12: The project design assumes that ASG Miners will be able to break-even with small scale equipment on untested ore bodies. This is a Killer Assumption (High Probability/High Impact).	Prospecting indicates 2 possible sites in R7 and a possible site in R8 indicates that prospecting can take place there. There is still enough time to install demos if priority is given and efficiency in deployment.	Make sure to have 2 demos in semi-controlled circumstances deployed. Use that information to reassess the assumptions related to the process aspects of the project. Process the monitoring information within the framework being developed for component 5.

Finding	Conclusion	Recommendation
		Because of the time left in the project, do not disperse resources seeking a third demo site until the first 2 in region 7 have gone online or have been abandoned for lack of ore quality
13: The indicator, “reduction of 15 mt Hg” seems like a very high number and requires justification.	This will need to be validated	Assure an adequate control group to arrive at a conversion factor for no. of grams of Hg per gr. of Au processed.
<b>Component 2</b>		
14: Laing, 2021 provides promising cost and return scenarios for different ore bodies and different types of equipment. The demonstrations can validate using the financing assessment as a de facto baseline while a Guyanese baseline is being developed.		
15: All sources indicate that it will be in the interest of the small producer to pursue measures that reduce costs by eliminating mercury. If these are combined with the market measures proposed, the project can find a workable solution. .	Solutions and financing will have to be scaled to different sized producers It is unlikely that a sector-wide financing mechanism could be fully deployed and producing mercury free gold in all regions by the end of the Project.	A validation of the target1.2.1. “the no. of pounds of Hg” is required to adjust expectations.
16: The project updated Outcome Indicator 2.2 from “the number of financial mechanisms” to “the amount of money that will be made available to miners through the Financing Mechanism” developed under the project. This is necessary for adequate reporting on PlanetGOLD project level Indicator “dollars made available to ASGM through financial mechanisms” and it also focuses on the effectiveness of the mechanism in delivering the needed capital to the producers. It is also a more trackable indicator for GGMC, MNR and GGDMA and the NAP process.	Updating indicator 2.2. is necessary for adequate reporting on PlanetGOLD project level Indicator “dollars made available to ASGM through financial mechanisms” and it also focuses on the effectiveness of the mechanism in delivering the needed capital to the producers. It is also a more trackable indicator for GGMC, MNR and GGDMA and the NAP process	Change the indicator 2.2. from “the number of financial mechanisms” to “the amount of money that will be made available to miners through the Financing Mechanism”
		Implement the recommendations from the financing roundtable. Work with a dedicated

Finding	Conclusion	Recommendation
		group to define system-level actions for macro financing of the ASGM subsector or to capitalize larger scale opportunities. Consider a lend-lease strategy for the short-term or for implementing demos in Component 1.
<b>Component 3</b>		
17: There appeared to be hesitance in moving forward vigorously or in defining the concrete steps needed to get the process back on track. The project Director has networked with PlanetGold project managers. Interviews with sources in the PlanetGold network assured that resources are available to support Guyana, but the PMU and authorities only need to reach out. At the time of evaluation, the COVID situation was under control and some of the regions were opening up. In fact, joint missions in support of Component 1 were underway. The evaluators did not get the sense that the PMU was poised for a strong re-entry as COVID restrictions relaxed.	In Component 3, the evaluators did not get the sense that the PMU was poised for a strong re-entry as COVID restrictions relaxed when compared to the other components.	Build a team around this issue and include GGB or have them chair. A dedicated public-private team will assist the consultants in completing the outputs. Connect the team and the GGB director to PlanetGold and other networks such as RMI, ARM, etc.
		Recommendation: The consultants do not need to wait for Component 1. There is plenty of non-mercury Gold in Guyana that can be used to develop the brand, the connections, protocols, and test the system. As the demonstrations come online, the ASGM can be incorporated, and the full system developed
		Recommendation: Ask for help. The PlanetGold network and others will be willing to help think through the rough spots. Make extensive use of PlanetGold Parent Project resources for international markets and buyers. The roundtable concept seems to be working well in Component 1 and

Finding	Conclusion	Recommendation
		Component2. Facilitate a public-private working group can tackle the issues
		Recommendation: The Project could gain time working with GGB to establish the pathway with mid-sized or large producers using non-mercury processes. GGB is interested in exploring opportunities to improve Guyana’s Brand and reputation with respect to quality control.
Component 4		
<p>18: Outcome 4: Different stakeholders within the government could not describe what the policy actions of this project hoped to achieve.</p> <p>The Outcome is poorly organized and difficult to understand the relationship to the activities, output and to the outcome.</p>	<p>A deeper discussion should have happened early in the project to confirm the roles and expectations in the Project document.</p>	<p>A brief document that clearly lays out the actions, products, and expected results would be welcome for a terminal evaluation.</p>
		<p>Recommendation: The anticipated NAP for the Minamata Convention will provide policy guidance. The Project should support the multi-stakeholder fora required to develop those policies. Delivery is expected in Q3 of CY21 and a gap analysis has been completed. It can provide expert support to MNR, GGMC, and also GGB if requested to produce the requisite regulations that facilitate the production, financing and marketing of MFG and support the policy recommendations of the NAP.</p>
		<p>Recommendation: Consider a policy working group or inter-agency task force to define the types of policies needed and to consolidate the work of the different working groups. Their role will be to produce a high-level White paper or draft policy options, suggesting a pathway to support a responsible gold commodity chain and turn NAP recommendations into policy. They can</p>

Finding	Conclusion	Recommendation
		report to the Minamata Working Group. Better program expenditures to the end of the project based-on the agenda of the group
<b>Component 5</b>		
19: Early on, the M+E process for the project was confused with the M+E process for Mercury Free Mining.		
20: The outcome will not be obtained through the actions of the outputs. The national capacity of monitoring of the use of mercury in Gold Mining also depends on increasing the laboratory capacity of the GGB as a stopgap measure to calibrate and validate the observations of MNR/EPA on-the-ground. This then becomes an opportunity for future development beyond this project.	The actions of the project will clearly enhance MNR/EPAs capacity, but other actions would be needed to leave it firmly established	
21. There are no documented actions in support of the compliance division of MNR or EPA at the system level		Recommendation: Improve the visualization of the strategy to monitor mercury. Define the strategy for developing this capacity within MNR, EPA, GGMC, GGB, etc. A clear and bankable strategy will be a very important asset for future development within the sector within the NAP implementation program.
<b>Communications</b>		
22: The evaluators easily found project sourced communications materials without any orientation and were impressive in quality.	The regular production of quality communication products for circulation among stakeholders has ensured that the project is on track to achieve the intended Communications and Knowledge Management outcome	Recommendation: Strategically deploy communications products at the high political level to reinforce the recommendations from the NAP and buy-in on MFM financing and policy strategies.
		Recommendation: Given the quality of the communications materials, strategically deploy communications assets to the communities targeted for the demonstrations in Component 1 to increase buy-in of local miners, authorities, and jewelers. The communications team should

Finding	Conclusion	Recommendation
		devise a strategy to facilitate the transition to mercury free mining based on the experience of using a jeweler to tell the story from the demand side. The same recommendation holds for Component 4 in promoting policy suggestions.
		Recommendation: A suggestion made during the interview was to seek out language savvy persons from different indigenous communities that may presently work in the mining industry, even large-scale mining, to be the face of the initiative or to work as interpreters of both technology and language.
<b>Project Implementation and Adaptive Management</b>		
23: Evaluators reviewed management effectiveness through CVs and from interviews.	CI recruited quality staff and consultants competent in their areas and that enhanced the trust between the PMU, partners and beneficiaries. These were important in responding to the trust barrier characteristic of environmental NGOs working in the mining sector	
24: CI-Guyana provided a productive and safe work environment.		
<b>Risk Assessment</b>		
25: (Risk Assessment) The mitigating measures do not respond to the nature of the risk. Promoting the technology as a means of greater economic gains adds unnecessary variables and increases the risk. What happens if the technology is successful but market conditions crash? What happens if the technology does not work?	Conclusion: The risk mitigation to component 1 “high” risk actually creates more risk. The approach links technology transfer with market measures aggregating risk from both categories. The approach or strategy voiced by miners is based on maximizing gold, not a better market price. The focus on a better market when dealing with miners does not match their interest.	<u>Recommended change in tactics:</u> Delink the technology from the market forces. To focus on the technology. Let the miners know the project (and they) are trying to find a better way to capture more gold from the existing ore body with less loss and less cost (no mercury). Create the conditions so that they can try the technology without risk to their businesses for one month. For example, maybe create a guarantee to buy the same amount of gold that they normally produce in, for example, one month if the producer produces X oz. Au in one month, offer the value of X oz as a guarantee no matter what the new equipment produces. If the equipment

Finding	Conclusion	Recommendation
		<p>produces more, then they have a bonus. If it produces less, they are not losing anything out-of-pocket. Then take your X oz. Au to the lab and certify it as mercury free. If the producer understands that they will evaluate it, and they will be part of the changes if this run is not successful. This will take the risk out for the producer and you will get participation and an honest assessment of the yields. A full-time mining intern must be on-site to accompany the process and take measurements of throughput and yield, as well as fixed and variable costs. The intern could also take baseline information for the certification process. The risk rating would then be "low" Taking the gold from the site to the market is a separate issue that has other intrinsic risks.</p>
<p>26: Risk: C1/Theft is not addressed in the PRODOC</p>	<p>Risk: C1/Theft is not addressed in the PRODOC</p>	<p>Risk/C1 Theft/Security is a serious concern for ASGM. The claim of theft could also contaminate the data taken in component 1 needed to set up a technical operation that works and for component 2: a dedicated financing mechanism. Have a dedicated mining technician on-site for the duration of the trials to validate claims of theft. Is there another collective solution?</p> <p>Are there other ways miners protect themselves? Women?</p> <p>What is the contingency for theft? collective insurance?</p>
<p>27: Risk/C1/Participation of GGDMA-GWMO This is not a risk.</p>	<p>Risk/C1/Participation of GGDMA-GWMO This is not a risk. This is a pre-condition.</p> <p>This is a pre-condition. They should be fully engaged in driving the process mentioned above. In fact, the mining sector organizations can be a</p>	<p>The contingency would be to create a private sector or a public-private stimulus fund from the extractive industry to offset the negative environmental externalities of their own industry. For example, large corporations could kick-into a compensation fund based on</p>



Finding	Conclusion	Recommendation
	<p>hedge against risk in the establishment of sustainable financing and in the ecologic recovery of mined sites. They have been supporting the ASGM sector with CI since the launch of ADOD since 2016.</p>	<p>their agreements with the government or through Corporate and Social Responsibility schemes. The role of GGDMA appears to be underutilized. Within GGDMA are the best talented, most successful, and politically connected members of the extractive industries in Guyana. They are also moving to include small scale miners through CWMO in their membership. The industry could rally support for ecological restoration or manage a stimulus fund to pre-purchase gold from miners willing to participate in the program. Larger scale miners could be rewarded through points towards their compliance packages or with some other fiscal incentive or offset. A mixture of public and private sources of financing would reduce the risk load for any given institution by spreading the risk around.</p>
<p>28: No risk related to loss of equipment or loss of access to sites due to flooding or other climatic events</p>		<p>Evaluate if there is a history of severe weather events.</p>
<p>29: This should not be a risk. This should be a pre-established condition of the project. What exactly is the risk? Political change? Change in policy? This needs to be defined. Why is this incumbent on the government? To establish, or not, a government funded financial mechanism is a political decision. The contingency therefore should be political in nature.</p>		<p>The contingency would be to create a private sector or a public-private stimulus fund from the extractive industry to offset the negative environmental externalities of their own industry. For example, large corporations could kick-into a compensation fund based on their agreements with the government or through Corporate and Social Responsibility schemes. The role of GGDMA appears to be underutilized. Within GGDMA are the best talented, most successful, and politically connected members of the extractive industries in Guyana. They are also moving to include small scale miners through CWMO in</p>

Finding	Conclusion	Recommendation
		<p>their membership. The industry could rally support for ecological restoration or manage a stimulus fund to pre-purchase gold from miners willing to participate in the program. Larger scale miners could be rewarded through points towards their compliance packages or with some other fiscal incentive or offset. A mixture of public and private sources of financing would reduce the risk load for any given institution by spreading the risk around.</p>
<p><u>30</u>: GGB expressed interest to evaluators to brand all of Guyana’s Gold. They also indicated that there is plenty of non-mercury Gold that could be used to begin that process.</p>		<p>Develop a pathway with GGB, identify the support needed through component 3 or one of the other GEF Gold projects and sign an MOU to support that work. This is the opportunity for a policy proclamation sought in Component 3.</p>
<p><u>31</u>: As stated, “Sustainability of the project outcomes is unrealized at a landscape level” is not a risk, rather a negative outcome that could be influenced by other factors outside of this component. The risk could be the occurrence of something that could derail progress on the outputs or overall outcome. A Risk might be discontinuity of policy through political change, or a unforeseen change in policy or willingness to enforce.</p>		<p>PMU should identify the actual risk to this outcome and consult the PSC. Once the NAP is ratified, it will become the policy instrument of reference. The NAP process is advancing with GEF funding through a separate grant to UNEP/GoG. GGB has indicated their desire to brand all gold in Guyana as non-mercury. Evaluators agree that the rating is “moderate” until the variables are eliminated following the NAP process. For each risk, define actions to mitigate or contingencies if actions cannot be mitigated.</p>
<p><u>32</u>: No risks were identified for Component 5. The national capacity is the function of several agencies. In the field, EPA has the lead. For the market, GGB assures the quality of the metal. The project document does not specifically define the target. We assume that this is related</p>		<p>It is important to review the national capacity document and NAP document when available to determine the gaps in Sampling, analysis and reporting for all agencies involved. This will confirm the scope of this project vs. future capacities that are necessary for</p>

Finding	Conclusion	Recommendation
to field-level monitoring, but that is an assumption.		further development. This aspect will be important for the terminal evaluation.
33: “Lessons learnt do not reach target audiences” is not a risk. This is a result.		Identify the risks associated with this, if there are not any, then remove this from the risk assessment table
33: “Climate Change” is a very weak assessment that does not link climate related risk factors to the project strategy		Review the Climate Change scenario for the region and determine what the effects could be on the ASGM sector. For example, If extended droughts are prognosticated for the indicated regions, then crop failure could be a reality and move more people into mining. Determine the reality for regions 7 and 8 where the activities occur.
34: Evaluators do not know what “Geological events from mining activities” refers to.		Eliminate or define
<b>Safeguards</b>		
35: Gender is mainstreamed throughout the project and is deemed Highly Satisfactory “HS”	Conclusion: The project is compliant with GEF Gender Equality Policy (SD/PL/02) <sup>39</sup> and Guidelines <sup>40</sup>	
36: Indigenous Rights are respected and are successfully mainstreamed throughout the project	Conclusion: The project is compliant with Principles and Guidelines for Engagement with Indigenous Peoples (GEF/C.42/Inf.03/Rev.1) <sup>41</sup>	

<sup>39</sup>Global Environment Facility. November 2017. Policy on Gender Equality URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Policy.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Policy.pdf) ; accessed 22 January 2021.

<sup>40</sup> \_\_\_\_\_. June 2017. Guidelines on Gender Equality. URL: [https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Guidelines.pdf); accessed 22 January 2021.

<sup>41</sup> \_\_\_\_\_. October 2012. Principles and Guidelines for Engagement with Indigenous Peoples. URL: [https://www.thegef.org/sites/default/files/publications/Indigenous\\_Peoples\\_Principle\\_EN.pdf](https://www.thegef.org/sites/default/files/publications/Indigenous_Peoples_Principle_EN.pdf) accessed 19 January 2021.

Finding	Conclusion	Recommendation
37: Stakeholder engagement is actively mainstreamed into the project's implementation framework.	Conclusion: The Grievance mechanism and Stakeholder engagement strategy are compliant with GEF Stakeholder Engagement Policy (SD/PL/01) <sup>42</sup> and Guidelines <sup>43</sup>	
Sustainability		
	It is still too early to make judgements about sustainability. There is not enough information about the economic, social, political, institutional sustainability with most of the outputs yet to be realized.	Focus on the steps and data necessary to have a meaningful Terminal Evaluation

<sup>42</sup> \_\_\_\_\_. November 2017. Policy on Stakeholder Engagement. GEF/SD/PL/01. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Policy\\_0.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Policy_0.pdf); accessed 26 January 2021.

<sup>43</sup> \_\_\_\_\_. December 2018. Guidelines on the Implementation of the Policy on Stakeholder Engagement. URL: [https://www.thegef.org/sites/default/files/documents/Stakeholder\\_Engagement\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Stakeholder_Engagement_Guidelines.pdf); accessed 26 January 2021.

**The Evaluators/Consultantes:**

1. They must present complete and fair information in their assessment of strengths and weaknesses, so that the decisions or actions carried out are well.
2. They should disclose the full set of conclusions together with information on their limitations and make it available to all those affected by the evaluation who have the express right to receive the results.
3. They shall protect the anonymity and confidentiality of individual informants. They must offer maximum notice time, limit time demands and respect people's right not to get involved. Evaluators must respect the right of individuals to provide information confidentially and must ensure that sensitive information cannot be traced back to its source. Evaluators are not obliged to evaluate individuals but are required to maintain the balance between the evaluation of management functions and this general principle.
4. Sometimes, when carrying out the evaluations, they will uncover evidence of crimes. Such cases should be reported discreetly to the appropriate investigative body. Evaluators should consult with other relevant supervisory bodies when there is the slightest doubt as to whether these issues should be communicated and how they should be communicated.
5. They must be sensitive to beliefs, customs and customs and act with integrity and honesty in their relations with all interested parties. In line with the United Nations Universal Declaration of Human Rights, evaluators must be sensitive to the issues of discrimination and gender equality. They should avoid offending the dignity and self-esteem of those with whom they establish contact during the evaluation. Knowing that there is a possibility that the evaluation will adversely affect the interests of some stakeholders, the evaluators should conduct the evaluation and communicate the objective of the evaluation and its results in a way that clearly respects the dignity and self-esteem of those involved.
6. They are responsible for their actions and the product(s) they generate. They are responsible for a clear, accurate and balanced written or oral presentation, as well as for the limitations, conclusions and recommendations of the study.
7. They should apply sound accounting procedures and be prudent in using the resources of the evaluation.

**MTR Consultant Agreement Form**

Agreement to abide by the UN System Code of Conduct for Evaluators:

Name of Consultant: Guido Fernández de Velasco Sert

Name of the Consulting Organization:: Asesores Ambientales Estrategicos (AAE)

**I affirm that I have received and understood and will abide by the United Nations Code of Conduct for Evaluators..**

Signed in Barcelona on 27 August 2018



Signature:

Annex XIII. Audit Trail

Project Title:	A GEF GOLD/Supply Chain Approach to Eliminating Mercury in Guyana’s ASGM Sector: El Dorado Gold Jewelry – Made in Guyana   GEF ID 9713
Executing Agency:	Conservation International GEF Project Agency (CI-GEF)
Duration:	48 months
GEF Grant Amount:	\$ 2,652,294 U.S.
Date of Mid Term Evaluation:	January 2021 – May 2021
CI-GEF Agency team members responding:	Courtney McGeachy, [Officer 2] [Officer 3]
CI-Guyana team members responding	

The CI-GEF team is providing an agency response to the mid-term evaluation report prepared by Asesoramiento Ambiental Estratégico (AAE). The following are responses from the consultant to Implementing Agency comments from the CI-GEF team in relation to the content of the draft Mid-term Review report.

Document Section	CI-GEF Agency Comments/Recommendations	Response from consultant on if/how comments were addressed
All	Please review for grammatical errors. Some are fixed in tracked changes	Text was edited.
Figures	Please correct all figure numbers and associated text. Many were misnumbered.	Done
Section I.2.	Please respond to questions on progress status.	
	<p>“Component 2.” par. 2; page 9: Is there a plan B in the event that the in person consultations are not possible? (CI-GEF)</p> <p>This is written as though the MTR was conducted before the finance mechanism consultancy started. Consultations commenced in Nov ’20 via</p>	<p>Agreed. The Financing Roundtable had not commenced when the notes were made. As stated, the consultancy was in-force. The MTR Roundtable was implemented during the MTR. The paragraph has been modified to more accurately reflect the time frame.</p> <p><i>“This activity required a significant number of in-person consultations, but</i></p>

	<p>telephone and online and concluded with 2 hybrid round tables early '21. (PMU)</p>	<p><i>ahead of that phase, as necessary, a rigorous baseline assessment of ASGM financing with two planned round table discussions were conducted remotely to ensure continual progress."</i></p>
	<p>"Component 3." par.3; page 9: Is the date correct? (CI-GEF)</p> <p>Certificate was issued in June 2020 and remains in force until March 2026 (PMU).</p>	<p>Dates corrected.</p>
	<p>"Component 3." par.3, page 9: Joint assessment with whom? (CI-GEF).</p> <p>The assessment between TDI and CI-Guyana took place mid last year and was the basis of all TDI work done since then. Here again, the future tense is used, which suggests the assessment has not yet happened (PMU).</p>	<p>Text was edited to reflect the correct time frame and including the PMU clarification.</p> <p><i>"A joint assessment with CI-Guyana took place in 2020 of what remains to be achieved under the Consultancy. An agreement was reached on the best approach to having the remaining work completed under the circumstances where the Consultants are unable to travel to Guyana in the foreseeable future."</i></p>
	<p>"Component 5" par. 5; page 9.</p> <p>Consultancy concluded since mid-last year. MEF and RMP in place (PMU)</p>	<p>Text edited to incorporate the comment.</p> <p><i>"The Project Results Framework and a Results Management Plan are in-place."</i></p>
<p>I.3. Summary of concise conclusions.</p>	<p>A few questions in this section. Would be helpful to expand on some of the conclusions. Or indicate where further explanation is located in the text. (CI-GEF)</p>	<p>Note: bullets were changed to letters to facilitate exchange of comments</p>
	<p>(b) page 16.</p> <p>"Something is grammatically wrong here." (CI-GEF)</p>	<p>Text corrected.</p> <p><i>"There are elements of the baseline that were not clearly understood that explain the drivers behind the ASG Miner's behavior. Why ASG Miners do they do what they do? Will they reject new technologies for socio-economic reasons? These are questions that influence the success of failure of the Project Strategy."</i></p>

	<p>f) "Project Design, several indicators...;" page 16.</p> <p>The document attached as Annex IX was not prepared by Consultant Dejong. It appears to be the revised Project Results Framework document. (PMU)</p>	<p>Reference eliminated. We noted that Dejong's recommendations were included. This is the recommended Project Results Framework document incorporating adjustments to the project indicators <i>sensu</i> Dejong, 2020 with which evaluators concur. The title of Annex IX was also corrected.</p>
	<p>l) Page 17.</p> <p>Would you categorize as high risk prior to implementation? Or have new developments made it high risk?</p>	<p>Both. Section VI, Modified Risk Assessment, illustrates risks identified during formulation that were understated and presents new risks, such as, for example, COVID-19. The item l) has been expanded and a hyperlink to Section VI provided and the description reads, as follows:</p> <p><i>"l) This is a high-risk Project due to persistent and new significant risks. Section VI Modified Risk Assessment describes risks identified during the project formulation stage that were understated, one risk that was a killer assumption, and new risks in climate change and COVID-19."</i></p>
	<p>o) There is duplication of efforts across projects?" ..." more information on this would be helpful." (CI-GEF)</p>	<p>Evaluators heard this comment from 3 different highly placed sources. Since it appeared to be outside the boundary of the El Dorado Gold Project, we did not investigate in-depth. We did determine that the upstream communication between persons who attend key meetings and upper-level decision-makers is sometimes not effective. We decided to flag the issue for follow-up by CI-GEF and CI-Guyana and other PlanetGold partners.</p>
Table 2: Summary of Recommendations	<p>Project Strategy; page 17. Key Recommendation 3: Language not clear.</p>	<p>Language edited to match the comments on Project Strategy on page 105. See V.2 Recommendations below.</p>
	<p>Component 1: page 18</p> <p>R8 site location still to be confirmed. Most progress to date made at one site in R7. (PMU).</p>	<p>We concur with the comment on R8. On R7, our notes indicate that 2 sites were identified. The text changes the reference from R8 to R7. Regardless, time is running, and the point is that all assets must be deployed to affect a successful demonstration.</p>



	Outcome 4: Key Recommendation 17: Multi-stakeholder process?	As suggested, “Multi stakeholder fora required” changed to “multi-stakeholder process required.” Text changed in Review of component 4 on Page 106.
Virtual Presentation of Initial Findings	Page 30. In this section you mention meeting in person to debrief. Can you elaborate on that? Who will be participating? When will this take place?	This was Methodology text from before travel not being considered. Our mistake. Sentence eliminated. All presentations of findings were virtual.
III.1.1. The Environmental context	Page 32. par. 6.  [Is mining the] biggest driver in Guyana? is CI-Guyana monitoring this in the demonstration regions?	Yes, it is. One of the criteria in determining eligibility of Concessionaire is that establishment of demo site must not require clearing of forest. (PMU response)
III.2. Project Strategy	Page 35. Final paragraph. Annex IX is the revised Framework developed by CI-Guyana and approved by CI-GEF before the Consultancy commenced. (PMU)	Concur. The reference has been corrected in the text and in Annex IX. New hyperlinks are inserted.
III.3. Project Geography	Page 44.  The decision to not conduct Project activities in Region 9 was made in 2018. (PMU)	Noted. Text updated to 2018 to reflect the changes.
IV. 1. Project Justification	Finding 6: Not Clear/Don't understand this finding. (CI-GEF)	This finding goes to the heart of the uncertainty surrounding all kinds of mining, in particular ASGM. The success or failure of the technology is listed as a risk. Evaluators believe it is actually an assumption upon which the project is based and must prove true. The context paragraph and an additional note have been added for clarity. This point was confirmed in interviews with industry professionals and miners.  The text was modified for Finding 6. on page 49 to better explain the context around the finding. It now reads as follows:  The profitability of the operation for the ASG miner depends on many factors from the quality of the ore body to the

		<p>capacity of the equipment to the ease of operation, efficiency in labor, and movement (break-down and set-up) across the ore body. It has been demonstrated from the PlanetGold experience that similar technologies can work. However, each ore body and each mining operation are different.</p> <p>Mining is however a very site-specific proposition. Taking all mining into account, investors understand that there is only a 1 in 1000 chance that any mine will be profitable. For that reason, the quality of the ore body is what drives investment. Throughout the project, that variable has not been defined for the targeted regions until grab samples taken by GGMC and the PMU in Region 7 demonstrated promising results. Likewise, it is an assumption that the technologies proposed will actually work and provide an efficient and sufficiently low cost means of processing non-mercury gold in each situation encountered in each region. In fact, it is a killer assumption that must prove true to realize the project objective. For that reason, the demo sites are enormously significant. As discussed in this document, the miners are open to the idea, but they want to see it in operation.</p>
	<p>Finding 6: page 49. (continued)</p>	<p>Based on the above explanation, Finding 6 was modified as follows:</p> <p>“Finding 6: It is an assumption that the available technology will produce an attractive outcome for ASGM producers within the socio-economic and technological variables that could surface in demo areas. It is a killer assumption: high impact; high likelihood with a high consequence to the long-term program to address Mercury in Guyana’s ecosystems. The demos will be critical to proving the applicability of the proposed</p>

		technology given the characteristics of the ore body in regions 7 and 8.”
IV.2. Project Design and Strategy	The Project Design Architecture; page 51.  “The change was proposed by CI-GEF and so reflected in the revised Framework document” (PMU)	The reference was corrected, and a new link provided to the Revised Framework Document.
	The Project Design Architecture; page 51.  “Should be changed for reasons stated previously. Annex IX is the revised Framework developed in collaboration with CI-GEF (approved in June of 2020)” (PMU)	Related to the previous comment, the references were corrected in the last paragraph of page 51.
IV.3.1. Overall progress towards results	Figure: Budget Execution by Component.  “it would be helpful to add a third layer that shows "allocated/obligated" if possible.” (CI-GEF).	Information on the overall obligation was not requested by the evaluation team. hence, we cannot provide an overlay by component. CI-Guyana can update this information on a monthly and quarterly basis as a management tool.
	Final paragraph. Page 57: “Noteworthy is the No-Confidence vote leading to a parliamentary stalemate causing interruptions in government services.”	Many sources indicated that delays were caused by effects related to the nation’s political process. We understand from the comment that this was not the case. We therefore eliminated the sentence and disregard this as a valid reason for delays in project implementation.
	Finding 13. page 63.  Not clear on what is meant by “High Probability” as used here. Please clarify.	There is a high probability that the assumption does not prove true. In logical frameworks, the outputs produce the outcome if the underlying assumptions prove true. There is a high probability that this could not prove true. The Terminal Evaluation will need the results from the demos to determine if the key assumptions prove true or not.

	<p>Component 3. page 71. first paragraph.</p> <p><i>“The Director also reminded evaluators that Guyana has plenty of non-mercury gold that could be used as a proxy for the exercises to develop the market linkages which would evolve to the ASGM as the demonstrations come online.”</i></p> <p>“In fact, this was proposed by evaluator but not feasible because the Project cannot promote, or market gold produced by the suggested Miners because they are Large Scale and therefore outside remit of Project.” (PMU)</p>	<p>This came out in 2 interviews. One international and one national. The discussion that ensued with the evaluator does not indicate that the opportunity is proposed by the evaluator. The recommendations on page 72 are withdrawn.</p>
Stakeholder Interviews	Was the OFP interviewed?	Yes. Ms. Sharifah Razack, Exec Director (a.g), EPA/OFP (recent appointment) participated in the Inception Workshop and later delegated Ms. Odessa Duncan for the individual interview as she is familiar with the project.
VII: Safeguards	<p>Page 95. par. 2. “Even though a GEF review or ESIA was deemed necessary...”</p> <p>Where was this deemed necessary? (CI-GEF)</p>	<p>This was an editing error. Sentence adjusted to read, “...deemed <u>not</u> necessary...” The safeguard screening form determined this was not necessary. Regardless, the PMU is gauging the possible environmental effects of the demo areas in the Site evaluation process. Either way, CI is compliant with their internal ESMF.</p>
Section V.2. Recommendations	Project Strategy, first bullet; page 105. Last sentence not clear. (CI-GEF)	<p>Sentence changed to, “Provide a technician to accompany the demos 100% of the time to measure the variables such as throughput, output (Au/ton processed), Labor inputs for OPEX, and the Hg reduction calculation. This information will indicate that the equipment is correctly deployed and utilized according to specifications.”</p>
Section V.2. Recommendations	Component 3: Fourth (final) bullet; Page 106. Comment	The recommendation comes from a conversation with an international expert

	<p>published on the Summary of Key Recommendations table, Recommendation 13 (Page 162) states, <i>“This recommendation focuses on the larger miners who do not use mercury. These would be outside the remit of the project that focuses on mercury reduction and elimination where feasible within the ASGM sector.”</i> (CI- Guyana)</p>	<p>who stated that the project should point towards all gold being mercury free. The CI Guyana point is well taken.</p> <p>The recommendation has been modified to read, <i>“Although the El Dorado Gold project is not focused on small scale or large producers, GGB can be encouraged to establish the pathway to a validated non-mercury gold market for mid-sized or large producers using non-mercury processes. GGB is interested in exploring opportunities to improve Guyana’s Brand and reputation with respect to quality control. Perhaps PlanetGold could support with ideas or contacts.”</i></p> <p>The modified text is oriented towards the opportunity to support GGB without committing the project to activities outside of the project’s boundary.</p>
	<p>Component 4: Second bullet. “multi stakeholder process?”</p>	<p>As suggested, “multi-stakeholder <i>fora</i> required” changed to “multi-stakeholder process required”</p>
	<p>Risk Assessment and Management of Risks (first bullet) p. 107. Two comments: Grammatically confusing sentences; not clear.</p>	<p>Two sentences were edited for clarity. The edited sections read:</p> <p><i>“To focus on the technology. Let the miners know the project and the miners share a common interest: to find a better way to capture more gold from the existing ore body by using technology that will have with less loss of gold dust and more processing capacity at a lower cost (no mercury).”</i> That message seems to be resonating with the ASG Miners...</p> <p><i>“... If the producer understands that they themselves will evaluate the process. They will participate in developing the changes to the system. if the run is not successful. This will eliminate the risk for the producer, assure participation and provide for an honest assessment of the yields.”</i></p>
Annex XII Code of Conduct	Is this available in English	A translation of provided.


Rec #	Recommendation	Entity Responsible	CI GEF Responses
A	<b>Project Justification</b>		
A.1	<b>Key Recommendation 1:</b> TOC: Review the suggested TOC with partners to make sure the messaging and focus of the components matches the expectations of the beneficiaries.	CI-Guyana	Agreed. This will be presented to the PSC for their consideration and agreement
A.2	<b>Key Recommendation 2:</b> Do not redesign components. Consider changing the approach or focus of each component (See recommendations per component) to effectively delink them in the eyes of the beneficiaries.	CI-Guyana	The FY22 Workplan will take on board the component specific recommendations to make them less interdependent.
B	<b>Project Strategy</b>		
B.1	<b>Key Recommendation 3:</b> Test the assumption that the available technology will produce an acceptable outcome for ASGM producers within the socio-economic and technological variables that could surface in demo areas. In promoting the demos, focus the C1 demos on understanding the efficiency of the equipment and the yield. Create conditions for no-risk experimentation by miners (see recommendation below). Provide a technician to accompany the demos 100% of the time to measure the variables and assure the variables are produce of equipment correctly deployed and utilized according to specifications.	CI-Guyana	Agreed. Plans are underway for such an approach to be taken. Through collaboration with partners including GGDMA, GWMO, NMS and the concessionaires, arrangements will be in place for technicians to continuously gather information at the demo sites.
B.2	<b>Key Recommendation 4:</b> Adjust the language of log frame indicators 1.2.1., 12.2.2., 4.1.1., and output 5.1 is necessary to correct irrelevant constructions. Correct Language per Table 3 or as presented in Annex IX	CI-Guyana	Agreed – A revised log frame will be prepared in conjunction with the preparation of the FY22 WP for approval of CI-GEF
C	<b>Overall Project Design</b>		
C.1	<b>Key Recommendation 5:</b> Consciously update the baseline through measurement of these items through a survey and through trials with control groups for Hg. Capture the information as part of the development of the site plans and installation of demonstration areas in Component 1 and through the Monitoring System in Component 5.	CI-Guyana	Agreed – This will be done through regular gathering of information and data analysis
D	<b>COMPONENT 1: Appropriate mercury-free technologies mainstreamed in Guyana’s ASGM sector</b>		
D.1	<b>Key Recommendation 6:</b> Successful implementation will require that the entire organization strategically deploy all their professionals’ assets in the project to regions 7 & 8. This involves an all-hands approach between Mining technicians,	CI-GEF	Agreed – This will be reflected in the activities outlined in the FY22 WP and Budget

	safeguards, gender, communications, etc. from CI-G and from partner organizations.		
D.2	<b>Key Recommendation 7:</b> Make sure to have 2 demos in semi-controlled circumstances deployed. Use that information to reassess the assumptions related to the process aspects of the project. Process the monitoring information within the framework being developed for component 5. Because of the time left in the project, do not disperse resources seeking a third demo site until the first 2 in regions 7 & 8 have gone online or have been abandoned for lack of ore quality.	CI-GEF	Agreed
D.3	<b>Key Recommendation 8:</b> Assure an adequate control group to arrive at a conversion factor for no. of grams of Hg per gr. of Au processed.	CI-Guyana	Each Concessionaire's existing Mining operations will provide the control to be compared with the mercury free operation established
D.4	<b>Key Recommendation 9:</b> A validation of the target 1.2.1. "the no. of pounds of Hg" is required to adjust expectations	CI-Guyana	Agreed – Will be adjusted accordingly
E	<b>COMPONENT/OUTCOME 2: Mechanism for financing capital investments for Mercury-free technologies established and functional</b>		
E.1	<b>Key Recommendation 10:</b> Change the indicator 2.2. from "the number of financial mechanisms" to "the amount of money that will be made available to miners through the Financing Mechanism"	CI-Guyana	Agreed
E.2	<b>Key Recommendation 11:</b> Implement the recommendations from the financing roundtable. Work with a dedicated group to define system-level actions for macro financing of the ASGM subsector or to capitalize larger scale opportunities. Consider a lend-lease strategy for the short-term or for implementing demos in Component 1.	CI-Guyana	All efforts will be taken to create partnerships that will lead to implementing the recommendations. Political will rests at the core of each of the recommended mechanisms.
F	<b>COMPONENT/OUTCOME 3: Markets established for branded mercury-free gold from Guyana.</b>		
F.1	<b>Key Recommendation 12:</b> Build a team around this issue and include GGB or have them chair. A dedicated public-private team will assist the consultants in completing the outputs. Connect the team and the GGB director to PlanetGold and other networks such as RMI, ARM, etc.	CI-Guyana	Agreed – this will be facilitated through the engagement of the Mercury-Free Gold Certification Consultancy scheduled for FY22
F.2	<b>Key Recommendation 13:</b> The consultants do not need to wait for Component 1. There is plenty of non-mercury Gold in Guyana that can be used to develop the brand, the connections, protocols, and test the system. As the demonstrations come online, the ASGM can be incorporated, and the full system developed	CI-Guyana	This recommendation focuses on the larger miners who do not use mercury. These would be outside the remit of the project that focuses on mercury reduction and elimination where feasible within the ASGM sector.
F.3	<b>Key Recommendation 14:</b> Ask for help. The PlanetGold network and others will be willing to help think through the	CI-Guyana	Agreed.

	rough spots. Make extensive use of PlanetGold Parent Project resources for international markets and buyers. The roundtable concept seems to be working well in Component 1 and Component2. Facilitate a public-private working group can tackle the issues.		
F.4	<b>Key Recommendation 15:</b> The Project could gain time working with GGB to establish the pathway with mid-sized or large producers using non-mercury processes. GGB is interested in exploring opportunities to improve Guyana’s Brand and reputation with respect to quality control.	CI-Guyana	Agreed. Discussions with GGB have commenced.
G	<b>COMPONENT/OUTCOME 4: National policies and incentives for mercury-free gold established</b>		
G.1	<b>Key Recommendation 16:</b> A brief document that clearly lays out the actions, products, and expected results would be welcome for a terminal evaluation.	CI-Guyana	Agreed.
G.2	<b>Key Recommendation 17:</b> The anticipated NAP for the Minamata Convention will provide policy guidance. The Project should support the multi-stakeholder fora required to develop those policies. Delivery is expected in Q4 of FY21 and a gap analysis has been completed. It [the project] can provide expert support to MNR, GGMC, and also GGB if requested to produce the requisite regulations that facilitate the production, financing and marketing of MFG and support the policy recommendations of the NAP	CI-Guyana	Agreed
G.3	<b>Key Recommendation 18:</b> Consider a policy working group or inter-agency task force to define the types of policies needed and to consolidate the work of the different working groups. Their role will be to produce a high-level White paper or draft policy options, suggesting a pathway to support a responsible gold commodity chain and turn NAP recommendations into policy. They can report to the Minamata Working Group. Better program expenditures to the end of the project based on the agenda of the group.	CI-Guyana	Noted. This must be done to support MNR and the Minamata working Group as they lead in policy development.
H	<b>COMPONENT/OUTCOME 5: Monitoring and Evaluation</b>		
H.1	<b>Key Recommendation 19:</b> The compliance divisions of MNR and EPA are not mentioned. Improve the visualization of the strategy to monitor mercury. Define the strategy for developing this capacity within MNR, EPA, GGMC, GGB, etc.	CI-Guyana	Agreed. Discussions ongoing with MNR on the establishment of an inter-agency committee to recommend a monitoring system
H.2	<b>Key Recommendation 20:</b> A clear and bankable strategy will be an especially important asset for future development within the sector and within the NAP implementation program.	CI-Guyana	Agreed
I	<b>COMPONENT/OUTCOME 6: Communication and Knowledge Management</b>		



I.1	<b>Key Recommendation 21:</b> Given the quality of the communications materials, strategically deploy communications assets to the communities targeted for the demonstrations in Component 1 to increase buy-in of local miners, authorities, and jewelers. The communications team should devise a strategy to facilitate the transition to mercury free mining based on the experience of using a jeweler to tell the story from the demand side. The same recommendation holds for Component 4 in promoting policy suggestions	CI-Guyana	Agreed. These will be integrated into the Communications Strategy to be deployed over the remaining life of the project
I.2	<b>Key Recommendation 22:</b> A suggestion made during the interview was to seek out language-savvy persons from different indigenous communities that may presently work in the mining industry, even large-scale mining, to be the face of the initiative or to work as interpreters of both technology and language	CI-Guyana	Agreed
J	<b>Risks Assessment and Management of Risks</b>		
J.1	<b>Key Recommendation 23:</b> Delink the technology from the market forces. Let the miners know the project (and they) are trying to find a better way to capture more gold from the existing ore body with less loss and less cost (no mercury). Create the conditions so that they can try the technology without risk to their businesses for one month.	CI-Guyana	Agreed. This is consistent with our conversations with miners even now.
J.2	<b>Key Recommendation 24:</b> Risk/C1 Theft/Security is a serious concern for ASGM. The claim of theft could also contaminate the data taken in component 1 needed to set up a technical operation that works and for component 2: a dedicated financing mechanism. Have a dedicated mining technician on-site for the duration of the trials to validate claims of theft. Is there another collective solution? Are there other ways miners protect themselves? Women? What is the contingency for theft?	CI-Guyana	Agreed. In addition to a technician, it is intended that in collaboration with partners including GGMC, GGDMA, NMS, to provide dedicated technical support.
J.3	<b>Key Recommendation 25:</b> Risk/C1/Participation of GGDMA-GWMO 1. Eliminate this from the risk table. The contingency would be to create a private sector or a public-private stimulus fund from the extractive industry to offset the negative environmental externalities of their own industry	CI-Guyana	Noted. The project will continue to work with partners to have the required policies put in place.
J.4	<b>Key Recommendation 26:</b> Risk/Climate/C1: evaluate if there is a history of severe weather events that could destroy equipment deployed in Component 1. The mining systems are riverine systems that might be vulnerable	CI-Guyana	Agreed
J.5	<b>Key Recommendation 27:</b> Risk/GGB/C3 does not recognize Mercury Free Gold: Develop a pathway with GGB, identify the support needed through component 3 or one of the other GEF Gold projects and sign an MOU to support that work. This is the opportunity for a policy proclamation sought in Component 3	CI-Guyana	Agreed. Discussions with GGB already indicate that pathway is very likely
J.6	<b>Key Recommendation 28:</b> Risk/"Sustainability of the project outcomes is unrealized at a landscape level"/C1: PMU should identify the actual risk to this outcome and consult the PSC.	CI-Guyana	Agreed. The NAP development is on track for submission to the Minamata Secretariat by August

	Once the NAP is ratified, it will become the policy instrument of reference. The NAP process is advancing with GEF funding through a separate grant to UNEP/GoG. GGB has indicated their desire to brand all gold in Guyana as non-mercury. Evaluators agree that the rating is “moderate” until the variables are eliminated following the NAP process. For each risk, define actions to mitigate or contingencies if actions cannot be mitigated		
K	<b>Gender &amp; Safeguards</b>		
K.1	<b>Key Recommendation 29:</b> Risk/Safeguards/ “Lessons learnt do not reach target audiences” is not a risk. This is a result: Identify the risks associated with this, if there are not any, then remove this from the risk assessment table	CI-Guyana	Noted. Will do
K.2	<b>Key Recommendation 30:</b> Risk/Safeguards/ “Climate Change”: Review the Climate Change scenario for the region and determine what the effects could be on the ASGM sector. For example, if extended droughts are prognosticated for the indicated regions, then crop failure could be a reality and move more people into mining. Determine the reality for regions 7 and 8 where the activities occur.	CI-Guyana	Noted. Will do
K.3	<b>Key Recommendation 31:</b> Risk/C1: “Geological events from mining activities”: Eliminate or define	CI-Guyana	Noted. Will do
L	<b>Project Management</b>		
L.1	<b>Key Recommendation 32:</b> Extend the project close by 6 months through a no-cost extension modality. This will enable technical staff to continue working until the formal closure date without drawing attention away from technical activities during closure. Evaluators base this decision on the positive trend in the delivery of project activities.		CI- Guyana, Please submit an extension amendment request to CI-GEF
L.2	<b>Key Recommendation 33:</b> Deployment of project resources needs to be rescheduled within a new work plan that puts all staff and partners with new and realistic timeframes for realizing outputs.	CI-Guyana	Agreed. The FY22 Workplan process has started.
L.3	<b>Key Recommendation 34:</b> There appears to be a duplication of effort across all Gold Projects. The Minamata Working Group and the Implementing Agency should discuss how this can be eliminated.	CI-Guyana	Noted for discussion with MNR
M	<b>Sustainability</b>		
M.1	<b>Key Recommendation 35:</b> Not enough information to gauge sustainability. Focus on the steps and data necessary to have a meaningful Terminal Evaluation	CI-Guyana	Noted. Will do