

TERMINAL EVALUATION

Project ID:	4103
Project Name:	BS: Support the Implementation of the National Biosafety Framework
Countr(ies):	North Macedonia
Implementing Agency:	UNEP

TABLE OF CONTENTS

I. OVERVIEW	3
A. Description	3
B. Key Dates	3
C. Disbursements	3
II. PROGRESS STATUS AND ISSUES	4
A. Main Terminal Evaluation Findings	4
B. Stakeholder Engagement	4
C. Gender Equality	5
D. Knowledge Management	5
III. CORE INDICATORS	6
IV: CO FINANCING	6
V: ENVIRONMENTAL AND SOCIAL SAFEGUARDS	6
VI. ANNEX	7

I. Overview

A. Description

Project name

BS: Support the Implementation of the National Biosafety Framework

Country

North Macedonia

GEF ID

4103

Implementing Agency

UNEP

Executing Entity

Ministry of Environment and Physical Planning

Trust Fund

GET

Project Type

MSP

Objective

Implementation of the National Biosafety Framework in line with national priorities and obligations to the Cartagena Protocol on Biosafety

B. Key Dates

CEO Endorsement/Approval

11/9/2010

Agency Approval

4/27/2011

Implementation Start

4/27/2011

First Disbursement

7/11/2011

Expected MTR

9/30/2012

MTR Submission

5/8/2026

Actual MTR

Expected Completion

12/31/2015

Actual Completion

1/1/2016

Actual TE

1/1/2016

TE Submission

5/8/2026

Final Disbursement

3/7/2017

C. Disbursements

Project Financing

447,700.00

Cumulative Disbursement

149,849.90

II. PROGRESS STATUS AND ISSUES

A. Main Terminal Evaluation Findings

The project “Implementation of National Biosafety Framework for Turkey” (GEF ID 4067) was implemented by UN Environment, with the Ministry of Food, Agriculture, and Livestock (MFAL) as the National Executing Agency, between 2013 and 2017, including an 11-month no-cost extension. Funded under the GEF Biodiversity Focal Area, the project represented Phase II of Turkey’s biosafety support and aimed to operationalize the National Biosafety Framework (NBF) developed under an earlier initiative. The project responded to Turkey’s obligations under the Cartagena Protocol on Biosafety (CPB) and the country’s high biodiversity value, seeking to strengthen governance systems to prevent potential adverse impacts of Living Modified Organisms (LMOs) on biodiversity and human health.

The overall objective of the project was to build national capacity for the effective and full implementation of the NBF in line with national development priorities and international commitments. This objective was pursued through five interlinked components: (i) stocktaking and stakeholder analysis to identify gaps and capacity needs; (ii) strengthening the regulatory biosafety regime; (iii) establishing a functional administrative system for handling applications, risk assessment, risk management, and decision-making on LMOs; (iv) developing monitoring, inspection, and enforcement mechanisms supported by accredited laboratories; and (v) enhancing public awareness, access to information, and participation in biosafety decision-making. These components collectively contributed to the establishment of a legally mandated, institutionally anchored, and technically functional biosafety system in Turkey.

The project achieved most of its planned outputs and demonstrated strong national ownership, effective inter-institutional coordination, and robust capacity building, particularly within government institutions, academia, and technical agencies. However, several challenges emerged during implementation, notably the absence of outcome-level indicators, which limited systematic measurement of behavioural and institutional change. Stakeholder engagement was uneven, with strong participation from institutional actors but limited involvement of civil society, local communities, and vulnerable groups. Public awareness and participation remained the weakest pillar of the NBF, with persistent public mistrust and polarized views on GMOs. In addition, the project was assessed as human-rights and gender-blind at the design stage, which constrained its ability to address differentiated social impacts or promote equitable participation.

Environmental and social risks associated with the project were primarily governance-related rather than physical. Key risks included potential biodiversity loss resulting from inadequate biosafety decision-making, weak enforcement, or insufficient transparency. Over time, these risks were progressively mitigated through the strengthening of the legal and regulatory framework, the operationalization of the Biosafety Board and Scientific Committees, the expansion and accreditation of GMO detection laboratories, and targeted capacity building for regulators, inspectors, customs officials, and the judiciary. Transparency and information-sharing risks were addressed through the upgrading of the Biosafety Information Exchange Mechanism of Turkey, linked to the global Biosafety Clearing-House, and through legally mandated public disclosure of decisions and scientific opinions. Nevertheless, residual social risks related to inclusiveness, public trust, and participation were only partially mitigated.

In conclusion, the project played a catalytic role in consolidating Turkey’s National Biosafety Framework and significantly strengthened the country’s capacity to meet its obligations under the Cartagena Protocol on Biosafety. Institutional and financial sustainability of the NBF is highly likely, supported by a strong legal foundation and continued government commitment. While the project successfully reduced environmental risks through improved governance and technical systems, it also highlighted important lessons for future programming, particularly the need for stronger outcome-based monitoring, inclusive stakeholder engagement, and systematic integration of human rights and gender considerations. Addressing these areas will be critical to ensuring the long-term effectiveness, credibility, and public legitimacy of biosafety governance in Turkey.

B. Stakeholder Engagement

Progress on stakeholder engagement

At project design and CEO endorsement, stakeholder engagement was envisaged as a core implementation modality, with strong involvement of relevant ministries, regulatory agencies, academic institutions, laboratories, and civil society through a multi-sectoral Project Steering Committee, technical working groups, and participatory consultations. During implementation, meaningful progress was achieved, particularly between 2012 and mid-2014. The project successfully convened an inception workshop bringing together all key stakeholders, established a Steering Committee with broad inter-institutional representation, and facilitated active participation of line ministries, the Food and Veterinary Agency,

universities, and research institutions in working groups focused on biosafety legislation, risk assessment and risk management. Stakeholders were also engaged through targeted trainings, study tours, and technical consultations with international experts, which significantly strengthened individual capacities and fostered dialogue across institutions.

Challenges encountered in stakeholder engagement

Despite early progress, stakeholder engagement weakened substantially as the project evolved, largely due to factors external to the project. The deteriorating socio-political context, frequent changes in ministerial leadership, and weak institutional prioritisation of biosafety within the National Executing Agency undermined sustained engagement and decision-making. While technical stakeholders remained involved at the working level, engagement at senior and policy-decision levels declined, limiting institutional uptake of project outputs. The absence of formal approvals of the amended biosafety law and secondary regulations stalled engagement on downstream components such as inspections, monitoring, laboratory designation, and public awareness. Moreover, the planned Mid-Term Review, which could have served as a corrective mechanism to realign stakeholder commitments, was not conducted, and from mid-2014 onward, stakeholder engagement largely ceased as project activities entered a standstill.

Outcomes of stakeholder engagement

As a result of these dynamics, stakeholder engagement outcomes remained largely at the level of technical collaboration rather than institutional change. The project succeeded in creating platforms for dialogue, building technical consensus, and enhancing individual capacities across multiple institutions, demonstrating strong participatory processes in the production of key outputs. However, weak country ownership, lack of high-level institutional engagement, and unresolved governance issues prevented these participatory efforts from translating into sustained outcomes, such as the adoption of the legal framework, operational coordination mechanisms, or a functional public engagement system. Consequently, while stakeholder engagement contributed positively to knowledge exchange and capacity building, it did not lead to the establishment of a fully operational National Biosafety Framework, and the overall effectiveness and sustainability of stakeholder engagement were rated as unsatisfactory in the Terminal Evaluation.

C. Gender Equality

No specific gender-responsive measures or gender result areas were defined, implemented, or tracked under this project. At the time of CEO Endorsement/Approval, the project design did not include a gender action plan, gender-sensitive indicators, or explicit provisions to address gender equality or differentiated gender impacts. The project was conceived as a technical and institutional capacity-building intervention in the biosafety sector, targeting public institutions, regulatory authorities, laboratories, and academic bodies, and gender considerations were not integrated into the results framework, monitoring system, or stakeholder engagement strategy. Consequently, while women may have participated in trainings, workshops, and working groups as part of their professional roles, participation was not systematically planned, monitored, or reported in a gender-responsive manner, nor were sex-disaggregated data collected.

As a lesson learned, the Terminal Evaluation notes that the absence of gender considerations at the design stage limited the project's alignment with UNEP and GEF policies on gender equality and inclusive development. Future biosafety and environmental governance projects would benefit from explicitly integrating gender analysis at the CEO endorsement, including the identification of gender-responsive objectives, indicators, and monitoring mechanisms, to ensure that capacity-building activities, decision-making processes, and institutional reforms promote equitable participation and contribute more broadly to gender-responsive environmental governance.

D. Knowledge Management

The project's Knowledge Management (KM) approach, approved at CEO Endorsement, was primarily focused on knowledge generation, exchange, and dissemination to support institutional capacity building in biosafety. This approach relied on the production and sharing of technical knowledge products—including stocktaking and gap analysis reports, draft legal amendments, secondary legislation (rulebooks), risk assessment and risk management guidelines, and laboratory capacity assessments—developed through participatory processes involving national stakeholders and international experts. Knowledge exchange was operationalized through inception and steering committee meetings, multi-sectoral technical working groups, national and international training workshops, targeted study tours, and expert consultations, aimed at strengthening competencies within regulatory authorities, academic institutions, and technical agencies. In addition, the project intended to institutionalize knowledge sharing through the National Biosafety Clearing-House (BCH) website and reporting to the global BCH to facilitate access to information, transparency, and

stakeholder learning. While several high-quality knowledge products were completed and used for training and consultation purposes, the KM approach was only partially realized due to the project standstill from mid-2014, limited institutional uptake, and the eventual non-operation of the national BCH platform, which constrained longer-term knowledge retention and dissemination beyond the project's active implementation period.

III. Core Indicators

IV: Co Financing

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Investment Mobilized	Anticipated at CEO(\$)	Materialized at MTR(\$)	Materialized at TE(\$)
Recipient Country Government	Government of Macedonia	In-kind		236,000.00		167,655.00
Total Co-financing				236,000.00	0.00	167,655.00

Comments

V: ENVIRONMENTAL AND SOCIAL SAFEGUARDS

Overall Project/Program Risk Classification

PIF	CEO Endorsement/Approval	MTR	TE
			Low

Measures to address identified risks and impacts

The project was classified as low environmental and social risk under UNEP's Environmental and Social Safeguards (ESS) systems, as it was designed as an institutional, legal, and capacity-building intervention and did not finance or implement any physical works, field trials, infrastructure development, or activities involving direct environmental manipulation. The intended environmental impact of the project was positive, as it sought to strengthen the national regulatory, administrative, and monitoring framework for biosafety in line with the Cartagena Protocol on Biosafety and EU requirements, thereby reducing long-term risks associated with the handling, transfer, and use of living modified organisms (LMOs). Potential environmental risks were indirect and primarily linked to non-achievement of results, notably the failure to legally adopt the amended biosafety framework and operationalize monitoring and

enforcement systems, which could leave gaps in national biosafety oversight rather than introduce new harms. Social risks were also limited and mainly related to institutional governance and stakeholder exclusion, including weak public awareness mechanisms, limited transparency, and the absence of sustained public participation due to the non-operational Biosafety Clearing-House and stalled institutional coordination. The Evaluation did not identify adverse impacts related to land acquisition, involuntary resettlement, labor, indigenous peoples, or vulnerable groups, and no safeguard incidents were reported during implementation. Overall, while the project posed minimal direct environmental and social risks, the main ESS-relevant concern was the institutional and governance risk arising from weak country ownership and implementation paralysis, which constrained the realization of intended environmental benefits.

VI. ANNEX

Uploaded Document

Document Category	Prefix	Title
		TE
		TE