

TERMINAL EVALUATION

Project ID:	3655
Project Name:	BS Support for the Implementation of the National Biosafety Framework of Nigeria
Countr(ies):	Nigeria
Implementing Agency:	UNEP

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I. Overview

A. Description

Project name

BS Support for the Implementation of the National Biosafety Framework of Nigeria

Country

Nigeria

GEF ID

3655

Implementing Agency

UNEP

Executing Entity

Federal Ministry of Environment

Trust Fund

GET

Project Type

MSP

Objective

To assist Nigeria through capacity building activities to address identified gaps in legal, technical and administrative measures in ensuring compliance to the Cartagena Protocol on Biosafety

B. Key Dates

CEO Endorsement/Approval

3/31/2011

Agency Approval

9/6/2011

Implementation Start

9/6/2011

First Disbursement

6/10/2011

Expected MTR

11/10/2013

MTR Submission

5/7/2026

Actual MTR

6/30/2012

Expected Completion

8/8/2017

Actual Completion

8/8/2017

Actual TE

4/30/2018

TE Submission

5/7/2026

Final Disbursement

3/27/2018

C. Disbursements

Project Financing

1,061,500.00

Cumulative Disbursement

930,437.21

II. PROGRESS STATUS AND ISSUES

A. Main Terminal Evaluation Findings

The project “Support for the Implementation of the National Biosafety Framework of Nigeria” was designed to assist Nigeria in strengthening its capacity to comply with the Cartagena Protocol on Biosafety through the establishment of a functional and responsive national biosafety system. The overall project objective was to address identified gaps in legal, technical, and administrative measures related to the safe management of living modified organisms (LMOs), thereby enabling informed decision-making, effective risk assessment and management, and protection of biodiversity and human health. To achieve this objective, the project was structured around five interrelated components: (i) establishment of a baseline through stocktaking to identify gaps in the National Biosafety Framework; (ii) development of a system for handling LMO applications, including risk assessment and decision-making; (iii) establishment of a regulatory regime consistent with national obligations and the Cartagena Protocol; (iv) strengthening systems for monitoring, compliance, and enforcement; and (v) development of mechanisms for public education, awareness, and participation. Together, these components aimed to operationalize Nigeria’s biosafety framework by embedding biosafety governance within national institutions, policies, and regulatory practices.

The project was implemented in a complex and evolving risk environment shaped largely by governance, institutional change, and the socio-political sensitivity of genetically modified organisms (GMOs). Key challenges included a weak project design at inception, limited results-based monitoring systems, and an initially underdeveloped framework for public awareness and participation. Midway through implementation, the establishment of the National Biosafety Management Agency (NBMA) in 2015 fundamentally reshaped the operating context, introducing both opportunities and short-term delays linked to institutional transition, capacity constraints, and adjustments in project execution arrangements.

The project’s risk profile evolved over time, shifting from primarily institutional and implementation risks to more pronounced environmental and social governance risks as Nigeria began to operationalize its biosafety system. While the project itself did not finance physical interventions with direct environmental or social impacts, it enabled regulatory decisions—including GMO field trials and the commercial release of GMO cotton—that carry potential downstream risks for biodiversity, human health, and social acceptance if not properly managed. Socio-political risks became more visible toward the latter stages of implementation, particularly following civil society opposition and legal challenges related to GMO approvals, underscoring concerns around transparency, discretionary decision-making, and limited two-way stakeholder engagement.

In response, significant mitigation measures were progressively put in place, substantially reducing technical and environmental risk exposure. These included the enactment of a comprehensive biosafety law and regulations, the establishment of legally mandated risk assessment, monitoring, and enforcement systems, the development of detailed technical guidelines, the strengthening of laboratory capacity for GMO detection, and formalized coordination mechanisms with key regulatory agencies. Capacity-building initiatives enhanced institutional competence among inspectors, technical experts, and partner agencies, contributing to improved prevention and management of potential environmental risks. However, mitigation of social and reputational risks progressed more slowly, as the project did not fully implement a comprehensive public awareness and participation strategy, leaving residual socio-political risks at closure.

Overall, the project concluded with technical, institutional, and regulatory risks largely mitigated, supported by strong political commitment and improved governance structures, while moderate residual environmental and social risks remain, contingent on the continued effectiveness, transparency, and inclusiveness of Nigeria’s biosafety governance system beyond project completion.

B. Stakeholder Engagement

Since the Mid-Term Review (MTR) in November 2013, stakeholder engagement under the project has evolved significantly as Nigeria’s institutional landscape for biosafety has changed. At the CEO Endorsement, stakeholder engagement was largely conceived around inter-ministerial coordination led by the Federal Ministry of Environment, supported by a national coordinating mechanism and technical committees, with limited clarity on engagement pathways for non-state actors. Following the MTR—and especially after the enactment of the National Biosafety

Management Agency (NBMA) Act in 2015 stakeholder engagement became more structured, centralized, and operational. The establishment of NBMA as the Competent National Authority enabled a clearer definition of roles, formalized interfaces with sector ministries and regulatory agencies, and more consistent interaction with technical experts involved in risk assessment, monitoring, and enforcement.

In terms of progress, engagement with government and institutional stakeholders strengthened substantially after the MTR. NBMA formalized collaboration through memoranda of understanding with key frontline agencies, including the Nigeria Agricultural Quarantine Service, National Agricultural Seeds Council, NAFDAC, and standards and customs authorities. Advisory mechanisms, notably the National Biosafety Committee and technical sub-committees, were activated on an ad-hoc basis to support application review and risk assessment. Capacity-building workshops and targeted consultations were conducted with public officials, researchers, academia, judiciary representatives, inspectors, and laboratory staff. These engagements contributed directly to improved ownership and alignment across government actors, enabling the regulatory, administrative, and monitoring systems to become operational by the end of the project.

However, the project also faced notable challenges in stakeholder engagement, particularly with respect to civil society, farmers, consumers, and the wider public—an issue already flagged at MTR and only partially addressed thereafter. While the project supported awareness activities such as national biosafety conferences, translation of the biosafety law into local languages, and media outreach, it did not succeed in operationalizing a comprehensive Public Awareness and Participation Strategy as envisaged at the design stage. Engagement largely followed a one-way information model rather than a sustained, two-way dialogue. This limitation became more visible after 2016, when NBMA approved the commercial release of genetically modified cotton, prompting legal action and public opposition from a group of civil society organizations, highlighting gaps in trust, inclusiveness, and perceived transparency.

Overall outcomes with respect to stakeholder engagement show a mixed but instructive trajectory. Engagement with government institutions and technical stakeholders matured into a functional governance network capable of supporting biosafety decision-making and regulatory enforcement, which represents a substantive outcome compared to the pre-MTR situation. At the same time, limited progress in embedding participatory mechanisms for non-state stakeholders constrained socio-political sustainability and exposed the regulatory system to contestation. By project completion, stakeholder engagement outcomes were therefore strong in terms of institutional coordination and ownership, but moderate in terms of broader societal participation—underscoring the evaluation’s recommendation to prioritize structured, inclusive engagement strategies and capacity building as a post-project follow-up.

C. Gender Equality

There were no gender-responsive measures explicitly designed, implemented, or tracked under this project, either at CEO Endorsement/Approval or during implementation. The project results framework, logical framework, and Monitoring and Evaluation documentation did not include gender-sensitive indicators, gender-disaggregated targets, or a gender action plan, nor did they articulate specific gender result areas related to biosafety governance, capacity building, or public participation. While women may have participated incidentally in trainings, workshops, and conferences alongside men, participation was not systematically documented or disaggregated by gender, and no analysis was undertaken to assess differential impacts, roles, or benefits for women and men. The evaluation explicitly notes this gap and rates the project’s responsiveness to human rights and gender equity as Moderately Unsatisfactory, identifying the absence of gender analysis and reporting as a weakness. A key lesson learned is that future biosafety and environmental governance projects should integrate gender considerations at the design stage—particularly in stakeholder engagement, education, and public awareness components—to strengthen inclusiveness, accountability, and socio-political sustainability of results.

D. Knowledge Management

The project’s Knowledge Management (KM) approach, as approved at CEO Endorsement, was implicit rather than formally articulated, and was primarily embedded within capacity-building, information sharing, and reporting mechanisms rather than structured as a standalone KM strategy. The project relied on a combination of technical documentation, training materials, workshops, national biosafety conferences, and the use of institutional platforms to

generate, capture, and disseminate knowledge related to biosafety governance. Key KM instruments included the development and dissemination of laws, regulations, guidelines, manuals, and risk assessment tools; reporting and documentation through UN Environment’s ANUBIS information system; and contribution to the Biosafety Clearing-House (BCH) to share decisions, risk assessments, and regulatory information at national and international levels. Knowledge exchange was further supported through regional and sub-regional learning events coordinated by UN Environment, promoting peer learning among Nigeria, Ghana, and Liberia. While these measures enabled effective technical and institutional learning among government stakeholders, the evaluation notes that the KM approach remained largely internally focused, with limited systematization, weak feedback loops, and insufficient outreach to non-technical audiences, highlighting the need for future projects to adopt a more explicit, results-oriented KM framework with clearer audiences, learning objectives, and dissemination pathways.

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 (FMENV)	In-kind		1,046,000.00		778,210.00
Total Co-financing				1,046,000.00	0.00	778,210.00

Comments

V: ENVIRONMENTAL AND SOCIAL SAFEGUARDS

Overall Project/Program Risk Classification

PIF	CEO Endorsement/Approval	MTR	TE
			Medium/Moderate

Measures to address identified risks and impacts

The project was assessed as moderate-risk from an environmental and social perspective, with risks largely arising not from project activities themselves but from the policy and regulatory outcomes they enabled. Environmentally, the

primary potential risk relates to the authorization of genetically modified organisms (GMOs), including confined field trials and eventual commercial release, which may pose risks to biodiversity, ecosystems, and human health if risk assessment, monitoring, and enforcement systems are weak or inconsistently applied. These risks were mitigated through the establishment of a comprehensive biosafety regulatory framework, mandatory risk assessment procedures, monitoring and enforcement guidelines, and laboratory capacity for GMO detection. Socially, the main identified risks concerned public acceptance, stakeholder trust, and potential conflict, particularly linked to perceptions of insufficient transparency and limited public participation in decision-making on GMO approvals. This was evidenced by civil society opposition and legal challenges following GMO authorization decisions. While no direct adverse social impacts such as displacement or livelihood loss were associated with project activities, the evaluation highlighted that limited two-way engagement and the discretionary nature of decision-making could undermine socio-political sustainability. Overall, the project complied with applicable ESS requirements by strengthening preventive regulatory systems, but residual environmental and social risks remain dependent on the sustained effectiveness, transparency, and inclusiveness of the national biosafety governance framework beyond project completion.

VI. ANNEX

Uploaded Document

Document Category	Prefix	Title
M and E Document	Terminal Evaluation (TE)	3655 TE
		TT