



VIETNAM POPS AND SOUND HARMFUL CHEMICALS MANAGEMENT PROJECT (PIMS5154)

MID-TERM REVIEW REPORT

By Dalibor Kysela, Team Leader Tran HoangYen, Team Member

Acronyms and Abbreviations

| APP | Annual Procurement Plan | | |
|------------|--|--|--|
| AWP | Annual Work Plan | | |
| BAT/BEP | Best Available Technique / Best Environmental Practice | | |
| CEM | Center for Environmental Monitoring | | |
| COP | Conference of Parties | | |
| GEF | Global Environment Facility | | |
| GoV | Government of Vietnam | | |
| HPPMG | Harmonized Programme and Project Management Guidelines | | |
| ICCM | International Conference on Chemicals Management. | | |
| MARD | | | |
| MDGs | Ministry of Agriculture and Rural Development | | |
| | Millenium Development Goals | | |
| MEAs | Multilateral Environmental Agreements | | |
| MOH | Ministry of Health | | |
| MOLIGA | Ministry of Industry and Trade | | |
| MOLISA | Ministry of Labour, Invalids and Social Affairs | | |
| MONRE | Ministry of Natural Resources and Environment | | |
| MTR | Mid-Term Review | | |
| NGOs | Non-governmental Organizations | | |
| NIP | National Implementation Plan | | |
| NTP | National Target Plan | | |
| PCBs | Polychlorinated Biphenyls | | |
| PCD | Pollution Control Department | | |
| PCDD/F | Polychlorinated dibenzo(p) dioxin and furan | | |
| PMU | Project Management Unit | | |
| POPs | Persistent Organic Pollutants | | |
| PPC | Provincial People's Committee | | |
| PRTR | Pollutant Release and Transfer Register | | |
| PSC | Project Steering Committee | | |
| PTSs | Persistent Toxic Substances | | |
| SAICM | Strategic Approach to International Chemicals Management | | |
| SC | Stockholm Convention | | |
| TCDD | Tetrachlorodibenzo-p-dioxin | | |
| TC/TA | Technical Cooperation/Technical Assistance | | |
| UNDP | United Nations Development Programme | | |
| VEA | Vietnam Environment Administration | | |
| VINACHEMIA | Vietnam Chemicals Agency | | |
| WENID | Waste Management and Environment Improvement Department | | |

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1. EXECUTIVE SUMMARY

Project Information Table

| Project Title | Vietnam POPs and Sound Harmful Chemicals Management Project | | | |
|--------------------------------|--|-----------------------------------|-------------------|--|
| UNDP Project ID (PIMS #): | 5154 | PIF Approval Date: | 1 April 2013 | |
| GEF Project ID (PMIS #): | 5067 | CEO Endorsement | 18 September 2014 | |
| | | Date: | | |
| Country(ies): | Vietnam | ProDoc Signature Date: | 29 January 2016 | |
| Region: | | Date project manager hired: | 1 October 2016 | |
| Focal Area: | Persistent Organic | Inception Workshop | 14 April 2016 | |
| | Pollutants | date: | | |
| GEF Focal Area Strategic | | Midterm Review Date: | March-May 2018 | |
| Objective: | | | | |
| Trust Fund: | GEF TF | Planned closing date: | 31/12/2018 | |
| Executing Agency/ | Ministry of Environment and Natural Resources (Vietnam Environment | | | |
| Implementing Partner | Administration) | | | |
| Other execution partners: | Ministry of Industry and Tra | de (Vietnam Chemicals Ag | gency) | |
| Project Financing | at CEO endorsement <u>(US\$</u>) | at Midterm Review <u>(US\$</u>)* | | |
| [1] GEF financing: | 2,550,000 | 315,793 | 5.00 | |
| [2] UNDP contribution: | | | | |
| [3] Government: | 8,050,000 | 1,307,642.00 | | |
| [4] Other partners: | 3,000,000 | 1,604,846.00 | | |
| [5] Total co-financing [2 + 3+ | 11,050,000 | 2,912,488.00 | | |
| 4]: | | | | |
| PROJECT TOTAL COSTS [1 | 13,600,000 | 3,228,2 | 283 | |
| + 5] | | | | |

Project Description

This report presents the findings of the Mid-Term Evaluation of the UNDP/GEF "Vietnam POPs and Sound Harmful Chemicals Management Project" (PHCM Project). This evaluation was conducted by two independent consultants, Dalibor Kysela (International Consultant - Team Leader) and Tran Hoang Yen (National Consultant-Team Member) on request of the United Nations Development Programme (UNDP) office in Vietnam.

The Vietnam POPs and Sound Harmful Chemicals Management Project was approved for implementation as a full-size GEF project on 18 September 2014 for duration of 36 months. The project aims at addressing challenges currently hindering consistent implementation of the Stockholm Convention obligations enforcement of and sound management of chemicals. The baseline analysis at the project submission found gaps in four distinct areas, namely policy frameworks, capability for POPs monitoring and reporting, management of sites contaminated with POPs/PTS and establishment of sound inventory of mercury and road map towards sound management and reduction of releases of mercury.

In the Project Document, thirteen barriers are listed that prevent Vietnam from consistently implementing sound management of chemicals and thus fulfil the country's obligations under the Stockholm Convention. The project strategy is to provide technical and financial support in activities under its four substantive components, namely i) environmental law and policy, ii)

monitoring and reporting of POPs/PTSs, iii) management of contaminated sites, and iv) inventory of mercury. The project aims at addressing the barriers under its four substantive components which are currently hindering a consistent implementation and enforcement of the Stockholm Convention and of a sound management of chemicals.

Project Progress Summary

The MTR found that implementation of several of the planned outputs are at the stage of recruitment of consultants, in some more advanced cases waiting for the consultants' deliverables in the form of technical reports, draft guidelines and workshops facilitation. Due to the absence of the consultants' deliverables, it was not possible for the evaluators to assess the quality of the deliverables.

Outcome 3.2. on provincial management plans for the demonstration provinces has been the most advanced of the eight project outcomes in terms of progress towards achievement of the end-of-project targets. Specifically, Output 3.2.4 on clean up on Lam Hoa site has practically achieved the end-of-project target already around the time of MTR and it is expected that it will exceed the targets by the time of completion of the project.

On the contrary, the MTR team found very low implementation rates for Outcome 2.2 on national monitoring capacity for POPs/PTS, Outcome 3.1 on policies and regulations for management of POPs contaminated sites, as well as of Outcome 4.2 on public awareness on mercury sources and releases. Few outputs under the three outcomes have been in a very early stage of implementation. Although implementation of the outcomes under the Components 2 and 4 is sequential, due to the overall delay in the project implementation all three above listed outcomes require immediate attention of the project implementing partners in order to accelerate the implementation.

Despite the slow progress of the project implementation, the MTR team considers that several of the thirteen barriers to sound POPs and harmful chemicals management in Vietnam namely those related to the regulatory frameworks, information systems as well as POPs reporting are being addressed by the project activities under the respective project components 1, 2 and 4. The evaluators expect that some barriers could be removed by the achievement of the respective outputs by the end of the year 2018. Nevertheless, due to the delayed implementation of the three outputs above it is expected that by the end of the approved project implementation period the project objective will achieve its targets only with some shortcomings and will thus require extension of the implementation period.

In the area of project implementation and adaptive management the MTR team found deficiencies in five out of seven sub-areas as follows:

| Sub-area title | Rating |
|--|--------------------------------|
| Management arrangements | Moderately Unsatisfactory (MU) |
| Work planning | Moderately Unsatisfactory (MU) |
| Monitoring and evaluation | Moderately Unsatisfactory (MU) |
| Identification and management of risks | Moderately Unsatisfactory (MU) |
| Finance and co-finance | Moderately Unsatisfactory (MU) |
| Stakeholder engagement | Satisfactory (S) |
| Reporting and communication | Moderately Satisfactory (MS) |

Therefore, the implementation partners will be recommended to address the deficiencies in order to increase effectiveness of the project adaptive management and accelerate the implementation of the project.

The MTR team also analysed risks to sustainability of the project activities and established that due to the high commitment of the Vietnam Government to POPs and PTS management the risks to sustainability are low to medium and thus the probability that the benefits of this project will continue beyond the completion of the project is high.

The table below shows summary of MTR ratings and achievement.

MTR Ratings & Achievement Summary

| Measure | Measure MTR Rating ¹ Achievement Description | | |
|---|---|--|--|
| | Project Objective Rating: 3 (MU) | Due to delays in implementation of three out of eight outcomes, the project objective will achieve by the planned closing date of the project's targets with some shortcomings | |
| | Outcome 1.1 | The work on analysis and amendment of existing legislation in progress and on track to achieve end-of-project targets by | |
| | Rating: 4 (MS) Outcome 1.2 Rating: 4 (MS) | the planned closing date of the project The work on capacity building of key national institutions for formulation and implementation of national policies on POPs/PTS management and control in progress and expected to achieve the end-of-project targets by the planned closing | |
| | Outcome 2.1 Rating: 4 (MS) | date of the project Progress on national capacities for establishment of national database and reporting on POPs/PTS contamination sufficient and on track to achieve the end-of-project targets by the planned closing date of the project | |
| Progress Towards Results | Outcome 2.2 Rating: 2 (U) | Progress on enforcement of national POPs/PTS laboratory network for ambient and receptor monitoring slow and not likely to achieve all end-of-project targets by the planned closing date of the project | |
| | Outcome 3.1 Rating: 2 (U) | The work on key policies and regulations for management of POPs contaminated sites in very early stages of implementation and will not achieve the end-of-project targets by the planned closing date of the project | |
| | Outcome 3.2 Rating: 4 (MS) | Progress on provincial management plans for demonstration provinces achieves and output on clean-up Lam Hoa site has achieved the end-of-project target by the MTR | |
| | Outcome 4.1 Rating: 3 (MU) | Some progress on mercury baseline source and emission/release inventory achieved but the entire outcome not likely to achieve all end-of-project targets by the planned closing date of the project | |
| | Outcome 4.2 Rating: 3 (MU) | TOR for outreach workshops have been developed. Further progress pending on approval of 2018 APP | |
| Project Implementation & Adaptive Management | Rating: 3 (MU) | Implementation of some of the seven sub-components is no leading to efficient and effective project implementation and adaptive management, with some sub-components requiring remedial action. | |
| Sustainability | Rating. 4 (L) | Negligible risks to sustainability, with several outcomes on track to be achieved by the project's closure and expected to continue into the foreseeable future | |

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¹ MTR rating scores are explained in Annex 5

Summary of Conclusions

Conclusions on progress towards results:

The planned completion date of the project is not realistic. In order to ensure full achievement of all planned end-of-project targets, the project implementation period has to be extended.

Due to the nature and complexity of Components 2 and 4, further delays in implementation of the two components could put at risk their completion even if project extension (Recommendation 1) is granted.

Conclusions on project implementation and adaptive management

Flexibility for implementation by the implementing partners built in HPPMG has not been used effectively and to its full potential that has proved to have negatively affected the project implementation.

There is a need to strengthen PSC implementation support function focusing more on the achievement of results. The implementation of the project would benefit from a more detailed definition of the PSC role and function including definition of PSC procedures and specific functions. In particular, consideration of an additional PSC meeting in mid-year and decision making by e-mail circulation on ad-hoc important matters would be the desired improvement. Since PSC is the standard mechanism widely used in development assistance projects, the improved definition of PSC could serve as a template for replication in other similar future projects wherever necessary.

The approval mechanism at MONRE is too complicated and has caused delays in the project implementation. Delays in the approvals of the project work and procurement plans indicate that the project might be lacking high-level decision-making support in the lead implementing agency. The insufficient support could raise questions about the actual national ownership of the project.

The sequential mode of preparation of AWPs and APPs in combination with the complex approval mechanism has caused delays in implementation of the project.

Due to insufficient information about status of progress to end-of-project targets in the project annual work plans, operational monitoring of the project progress does not achieve the desired effectiveness.

Insufficiency of operational monitoring of actual co-financing levels for the project could pose a challenge for terminal evaluation at the project completion.

Conclusions on project logframe

Due to misplacement of some outputs under the Outcomes 2.1 and 2.2, the part of logframe for the project Component 2 lacks internal consistency.

Outdated timelines of some end-of project targets and in the logframe will cause problems at the stage of the terminal evaluation.

Conclusions on technical content and data collection

The lack of updated information on existing capacities for POPs/PTS monitoring has been one of the factors delaying implementation of the relevant component of the project (Outcome 2.2).

A more active role of the provinces in implementation of some project sub-components would give the project an additional dimension by partially compensating the traditional excess of focus on central stakeholders. Absence of nationally certified laboratories in the provinces is an obstacle to cost-effective assessment of contaminated sites.

The need for collecting information on number of affected beneficiaries as well as gender disaggregated data on project beneficiaries and on project socio-economic effects (e.g. on marginalized groups of population) is not well understood by the provincial governments. The insufficient data collection related to ultimate beneficiaries of the project will not facilitate project impact and gender sensitive analysis at the stage of terminal evaluation.

Lack of senior management commitment is routinely listed as one of the major risk factors for technical cooperation projects. As senior managers of the two national implementing agencies are key stakeholders in the implementation of the project, their active engagement in mid-term and terminal evaluation is vital to the success of the project.

The summary of recommendations is in the following table.

${\bf Recommendation\ Summary\ Table}$

| NT - | T2 | December detice | | | | |
|------|---|---|--|--|--|--|
| No. | Type ² | Recommendation | | | | |
| | Progress towards results | | | | | |
| 1. | | UNDP should submit request to GEF for project extension by 9 - 12 months and together with the | | | | |
| | C | National Implementing Partners to consider financial implications of covering from the project budget | | | | |
| | | the running costs of PMU for the duration of the extension | | | | |
| | | UNDP and the National Implementing Partners should pay special attention to accelerate the | | | | |
| 2. | C | implementation of Components 2 and 4 in order to ensure completion of the components by the end of | | | | |
| | ъ . | the extended project period | | | | |
| | Project implementation and adaptive management | | | | | |
| | | a) UNDP and the National Implementing Partners to improve the adaptive project management | | | | |
| | | mechanism for project implementation using the flexibility provisions in HPPMG such as timely | | | | |
| 3. | C | delegation of national procurement to UNDP | | | | |
| | | b) PMU should consider establishment of a roster of qualified national consultants in the technical | | | | |
| | | areas related to POPs/PTS and proactively notify the consultants on the roster about published | | | | |
| | | tenders in for procurement of advisory services in relevant areas of expertise | | | | |
| | | UNDP and the National Implementing Partners should consider revision of the PSC Terms of Reference | | | | |
| 4. | С | to better define its role and functions for the project. The revised TOR could include e.g. stipulation of | | | | |
| | | quorum for PSC decisions, possibility of one additional meeting per year as well as alternative for | | | | |
| | | decision making on urgent implementation issues by e-mail communication of the PSC members | | | | |
| 5. | С | The lead National Implementing Agency (MONRE) should streamline and simplify the approval | | | | |
| | | mechanism of project-related decisions in order to avoid delays in project implementation | | | | |
| 6. | С | PMU should prepare AWPs and PPs in parallel so that both plans can be submitted at the PSC meeting | | | | |
| | | at the beginning of the calendar year | | | | |
| 7. | С | The PMU should ensure that AWPs contain a monitoring component in terms of status of progress to the | | | | |
| | | end of project targets in order to improve operational monitoring of the project progress | | | | |
| | <u> </u> | PMU should actively manage the risk of insufficient co-financing by periodical updates of information | | | | |
| 8. | C | on actually provided co-financing for the project according to the Project Document by | | | | |
| | MONRE/DONRE, MOIT and bilateral funding Project logframe | | | | | |
| | Project | | | | | |
| | | The project implementing partners should consider reorganization of outputs under the project | | | | |
| 9. | N | Component 2 to achieve better internal consistency of the project logframe as follows: | | | | |
| | | Output 2.1.2 related to the laboratory monitoring capacity is moved under Outcome 2.2 Output 2.2.3 | | | | |
| - | | related to POPs/PTS reporting is moved under Outcome 2.1 | | | | |
| 10. | N | UNDP together with the National Implementing Partners should revise and update the outdated time | | | | |
| - | Tc -1 . | lines and/or reformulate targets for clarity if necessary | | | | |
| - | <i>1ecnnic</i> | al content and data collection MONDE should improve accordination of the national POPs/DTS manifesting according to order to | | | | |
| 11 | NT | MONRE should improve coordination of the national POPs/PTS monitoring capacities in order to | | | | |
| 11. | N | achieve more efficient and effective use of previous development assistance results in the field of | | | | |
| - | | POPs/PTs monitoring | | | | |
| | | a) The PMU should give provincial stakeholders such as DONREs a more active role in | | | | |
| | | implementation of some project outputs, such as output 2.2.2 on training on POPs/PTS monitoring | | | | |
| 12 | NT | and reporting, and output 3.2.3 on public awareness raising about contaminated sites and POPs | | | | |
| 12. | N | stockpiles b) Specifically DONREs in the five provinces selected for work on PORs/DTS conteminated sites | | | | |
| | | b) Specifically, DONREs in the five provinces selected for work on POPs/PTS contaminated sites | | | | |
| | | should identify provincial laboratories and in cooperation with MONRE support them to obtain | | | | |
| | N | national certification for POPs/PTS analyses | | | | |
| 13. | | PMU should ensure that trainings for representatives of the provincial governments include components | | | | |
| | | explaining need for data collection on number of beneficiaries as well as gender-sensitive data as well as | | | | |
| - | O+1 | information on socio-economic marginalized groups-related data. | | | | |
| | Other | Coming groups of the National Invalence time Deuts1111 | | | | |
| 1.4 | N⊺ | Senior management of the National Implementing Partners should provide support to the project by | | | | |
| 14. | | providing necessary resources including their active engagement with the project implementing teams on | | | | |
| | | important events such as project mid-term and terminal evaluations | | | | |

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 $^{^2}$ The recommendations are classified as critical (C) and normal (N). The explanation is at the beginning of the section 5. Conclusions and recommendations

2. INTRODUCTION

This report presents the findings of the Mid-Term Evaluation of the UNDP/GEF "Vietnam POPs and Sound Harmful Chemicals Management Project" (PHCM Project). This evaluation was conducted by two independent consultants, Dalibor Kysela (International Consultant - Team Leader) and Tran Hoang Yen (National Consultant-Team Member) on request of the United Nations Development Programme (UNDP) office in Vietnam.

2.1. Purpose of the MTR and Objectives

As outlined in the GEF Monitoring and Evaluation Policy, Mid-Term Evaluations (also known as Mid-Term Reviews, MTRs) are a mandatory requirement for all GEF-financed full-sized projects and constitute an important part of the GEF projects' monitoring and evaluation plan. 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. In order to fulfil the above purpose, MTRs are conducted in order to assess the projects' progress towards results, implementation and adaptive management for improvement of outcomes, facilitate early identification of risks to sustainability and provide supportive recommendations.

The objective of MTR is to provide the project partners i.e. GEF, UNDP and the Government of Vietnam with an independent assessment of progress towards achievement of the project objectives and outcomes as specified in the Project Document. MTR also provides independent assessment of 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. Last but not least, MTR also reviews the project's strategy and its risks to sustainability. As a standard requirement for all projects financed by GEF, this MTR has been initiated by the project Implementing Agency, in this case UNDP. The evaluation has been conducted according to the guidance, rules and procedures established by UNDP and GEF as reflected in the UNDP Evaluation Guidance for GEF Financed Projects.

2.2. Scope and Methodology

The evaluation will cover all activities undertaken in the framework of the project. The time scope of the evaluation is the implementation period of the PHCM project from January 2016 up to April 2018. The geographic scope of the evaluation is the whole country (Vietnam).

The evaluation has been carried out using a participatory approach that seeks to inform and consult with key stakeholders associated with the project using the primary evaluation criteria for GEF MTRs listed in the Terms of Reference for the evaluation, i.e. Project Strategy, Progress towards Results, Project Implementation & Adaptive Management, and Sustainability.

Below is presented a summary of the following elements that have been covered in the evaluation, based on the Evaluation Terms of Reference (TOR):

Project Strategy

- Project design
- Results framework/logframe

Progress Towards Results

- Progress towards outcomes analysis
- Remaining barriers to achieving the project objective

Project Implementation and Adaptive Management

- Management arrangements
- Work planning
- Finance and co-finance
- Project-level monitoring and evaluation systems
- Stakeholder engagement
- Reporting and communications

Sustainability

- Financial risks to sustainability
- Socio-economic risks to sustainability
- Institutional framework and governance risks to sustainability
- Environmental risks to sustainability

TOR for the mid-term review is provided as Annex 1.

2.3. MTR Approach and Data Collection Methods

The evaluation used the following evaluation instruments:

Evaluation Matrix: An evaluation matrix was constructed based on the evaluation scope presented in the TOR. The matrix is structured along the four GEF evaluation criteria for MTRs and includes principal evaluation questions. The matrix provided overall direction for the evaluation and was used as a basis for interviewing stakeholders and reviewing project documents.

Documentation Review: The MTR team conducted a review of documents that were made available to the team by the UNDP and the Project Management Unit (PMU) as well as other documents that the team obtained through web searches and contacts with managers of other projects that were launched in the framework of the Stockholm Convention and chemicals management in Vietnam. The documents served as the main source of information and for preparation for the evaluation field mission to Vietnam.

Mission Agenda: After the initial review of available documents, the MTR team drafted an agenda for the evaluation mission that included key national project stakeholder institutions to be visited and interviewed during the mission. The agenda was discussed and finalized with UNDP and the (PMU). The interviews were planned in advance of the mission with the objective to obtain a scan of stakeholders' views during the time allocated to the mission.

Interviews: The MTR team conducted a number of face-to-face consultations with the key project stakeholders using semi-structured interview questions. Through the interviews, the evaluators obtained information about the key informants' impressions and experiences about the implementation of the project. Triangulation of results, i.e. comparing information from different sources, such as documentation and interviews, or interviews on the same subject with different stakeholders, was used to corroborate or check the reliability of evidence. Confidentiality was guaranteed to the interviewees and the findings were incorporated in the final report.

Project Site Visits: These visits included sites of the project as well as the offices of key actors in order to make direct observations and be sensitized to the problems addressed by the project and talk to staff of the institutions involved in two provinces, Nghe An and Quang Binh.

Evaluation Report: After the data collection phase with conducting interviews, observing selected outputs and reviewing data from existing data sources, data analysis followed as the final phase of the evaluation. Data analysis involved organizing and classifying the information collected, tabulating it, summarizing it, and comparing the results with other appropriate information to extract useful information that responds to the evaluation questions and fulfils the purposes of the evaluation. In this process the evaluators took care of deciphering facts from a body of evidence by systematically coding and collating the data collected, ensuring its accuracy, and translating the data into usable formats or units of analysis related to the evaluation questions.

2.4. Structure of the Evaluation Report

This report closely follows the structure of the evaluation report outlined in the Terms of Reference that was prepared by UNDP Country Office in Hanoi as the commissioning unit for this evaluation.

The first part of the report describes the project background and summarizes factual information that was assembled during the initial data collection phase. The second part contains information that was collected through consultations with the key stakeholders before, during and eventually also after the evaluation mission. The third part provides evidence-based conclusions connected to the findings from the second part and recommendations in the form of corrective actions for the design, implementation, management arrangements as well as for monitoring and evaluation of the project.

2.5. Constraints and Limitations

The findings and conclusions contained in this report are based primarily on a thorough desk review of documents that were made available to the MTR team, one-week mission to Vietnam as well as follow-up exchanges by email. During the evaluation mission, the evaluators interviewed over 20 project related key informants. Within the given resources allocated to this evaluation, the MTR team was able to conduct a detailed assessment of progress towards the expected results. However, due to the complexity of the geographical scope of the project, MTR team could not visit all project sites during the one-week field mission.

3. PROJECT DESCRIPTION AND BACKGROUND CONTEXT

3.1. Development Context

The chemicals sector has been a major contributor to development of the country as Vietnam's chemical industry provides materials input for a number of essential industries, serving manufacturing and consumption. Under Decision 207/2005/QD-TTg, the chemical industry is showcased as one of the key industries and prioritized according to the country's socioeconomic development strategy. Under the same decision, the Prime Minister approved the strategy of developing the chemical industry to 2010, also with a look towards 2020. Due to importance of the chemical sector in economic development, the Government has set the targets to further increase the chemical sector both as production (14 to 15%) and value (14-16%) by 2020 and 2030 respectively³.

Vietnam signed the Stockholm Convention on May 23, 2001 and ratified it on July 22, 2002. It entered into force for it on 17th May 2004. Under GEF/UNDP assistance, the Prime Minister of Vietnam signed a decision approving and promulgating the Vietnam's National Implementation Plan for the Stockholm Convention on Persistent Organic Pollutants (NIP)⁴ and submitted the latter to the Stockholm Convention Secretariat in November 2007.

NIP constituted the basis of programs related to POPs undertaken nationally, including four GEF-4 Projects addressing POPs stockpiles and wastes (POPs pesticides, PCBs, and highly dioxin contaminated hotspots) and unintentional POPs (U-POPs), as well as participation in a global project on medical waste management. Consequently, the Government has adopted an overall strategy of integrating NIP implementation into a national framework for the sound management of chemicals throughout their life-cycle. A central part of this strategy is working with the GEF on development of an overall GEF-5 program aimed at addressing outstanding and emerging POPs and PTS issues, as well as ensuring that the NIP is undertaken within the developing SAICM framework. In 2011, the Government of Vietnam adopted National Target Program on Pollution Remedies and Environmental Improvement that provides a direct implementation framework to which the project can be linked, particularly in relation to POPs contaminated sites.

Vietnam has implemented many activities planned in NIP, including implementation of obligations related to the development of policies and regulations on POPs management, capacity building in POPs management, introduction of BAT/BEP for reduction of unintentional POPs, safe treatment of POPs stockpiles etc. Initially, twelve POPs have been recognized by the Stockholm Convention as causing adverse effects on humans and the ecosystem and placed in 3 categories: pesticides, industrial chemicals and by-products. Since its fourth meeting in 2009, The Conference of Parties to the SC (COP) has decided to amend Annexes A, B and C to the Convention by adding sixteen news POPs. At the same time, the Parties to the Stockholm Convention are required to periodically review, update and adopt NIP

³Decision No 1621/QD-TTg dated September 18th, 2013.

⁴Decision No.184/2006/QD-TTg dated 10th August 2006

where (new) POPs under amendments to the Stockholm Convention as well as update the situation of the initial POPs are considered.

Under further support from GEF/UNDP, the project on "Updating Vietnam National Implementation Plan for the Stockholm Convention on Persistent Organic Pollutants (POPs)" (NIP update Project) was implemented in 2014 - 2015. The project addressed issues generated by the new POPs added under the 2009 and 2011 amendments of the Stockholm Convention and listed priority actions required for POPs control, elimination and reduction of releases as well as baseline inventory of new and initial POPs and national capacity assessment for POPs management. On 17th October 2017, the Prime Minister promulgated a decision for the approval of the updated National Implementation Plan (NIP) of the Stockholm Convention on persistent organic pollutants to 2025, with orientation to 2030⁵.

In addition to the Stockholm Convention, Vietnam has ratified a number of other multilateral environmental agreements (MEAs). The country is Party to the Basel Convention having acceded to this convention in 1995 and is Party to the Rotterdam Convention which it acceded to in 2007. With the establishment of the Vietnam Chemicals Agency in 2008, the country has become an active member of the International Conference on Chemicals Management.

Vietnam has also been one of the first signatory of the Minamata treaty on mercury and deposited its notification of approval at the Secretary-General of the United Nations on 23 June 2017 and the Convention entered into force for it on 21 September 2017.

3.2. Problems that the project will address

The project aims at addressing challenges currently hindering consistent implementation of the Stockholm Convention obligations enforcement of and sound management of chemicals. The baseline analysis at the project submission found gaps in four distinct areas, namely policy frameworks, capability for POPs monitoring, management of sites contaminated with POPs/PTS and establishment of sound inventory of mercury.

In the Project Document, thirteen barriers are listed that prevent Vietnam from consistently implementing sound management of chemicals and thus fulfil the country's obligations under the Stockholm Convention. The project addresses the barriers under its four substantive components as displayed in Table 1 below.

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⁵Decision No. 1598/QD-TTg dated 17 October 2017

Table 1: Project components and related barriers

| Outcome No. | Area | Barriers |
|---------------|----------------------------|---|
| | | a. Environmental and chemical regulations incomplete and not compliant with SC requirements |
| 1.1 | Policy Framework | b. Lack of coordination among the authorities in charge of implementing different conventions |
| 2.1 | Information Systems | c. Lack of a sound management information systems on environmental data, pollutant sources, storage of hazardous chemicals and hazardous industrial processes |
| | | d. Deficiencies in understanding of the importance of preventive actions |
| 12 - 121 | Piala Assessment | e. Lack of implementation of risk assessment / risk reduction principles |
| 1.2 and 3.1 | Risk Assessment | f. Insufficient enactment of environmental quality limits |
| 2.2 | POPs Monitoring | g. Gaps in monitoring capability concerning specific matrices and POPs substances |
| 3.1 | | h. Lack of standard methodologies for selecting and evaluating POPs remediation technologies |
| 3.1 and 3.2 | - Management of POPs | Absence of regulatory tools aimed at the proper harmonisation, integration and enforcement of the methodologies for contaminated sites management |
| 3.1 | contaminated sites | j. Deficit of mechanisms for addressing small contaminated sites at the community level |
| 3.1 and 3.2 | | k. Lack of an inventory on POPs contaminated industrial sites (including dismissed facilities) around the country |
| 4.1 and 4.2 | Inventory of Mercury | Insufficient consolidate capacity for inventory of mercury sources and releases |
| Cross-cutting | Coordination of activities | m. Lack of financial capability to establish coordinated and inter-ministerial activities on POPs and chemicals |

3.3. Project description and strategy

The project strategy is to provide technical and financial support in activities related to environmental law and policy, monitoring of POPs/PTSs, management of contaminated sites and inventory of mercury and thus address all the barriers listed above which are currently hindering a consistent implementation and enforcement of the Stockholm Convention and of a sound management of chemicals.

On the side of policy framework (barriers a. to c.), the project focuses on identification of gaps in the current legislation, provision of technical assistance in the drafting necessary amendments to the regulation or new legislation, towards sound management of chemicals and hazardous waste/POPs. Taking into consideration the impacts and the benefits that will have on diverse stakeholders and the public. In doing that, the project will enhance cooperation among diverse governmental and non-governmental stakeholders and integration among different

regulatory instruments, with the general goal to integrated methodology and regulations with the relevant provision on POPs and PTSs.

To overcome barrier (d), the project will establish, at pilot level in two provinces, a Management Information System of monitoring data and pollution sources specifically addressed to POPs/PTS, but expandable to cover other pollutants, aimed at enforcement, planning, and reporting at national and international level following a PRTR approach. In doing so, the project will co-ordinate with ongoing bilateral activities like the JICA project on air quality management, which implementation is planned for the period mid 2014 to the end of 2015, and the JICA project "Strengthening chemicals management" (2014-2017) under which project a chemical database will be established as a project activity.

The project (barriers e. and f.) will ensure that scientific principles of risk assessment and environmentally sound management of chemicals – with specific reference to POPs and PTSs - are introduced in the drafting/amendment of legislation on chemicals.

For removing the barrier (g) related to monitoring capability, the project will increase the capacity of the country on monitoring by promoting accreditation of laboratories, providing training on sampling and analytical methodologies, providing technical knowledge for establishing baseline and quality standards, establishing PRTR system in a coordinated way and piloting PRTR at provincial level.

The project, to overcome the barriers on the management of contaminated sites (barriers h. to k) will build on the experience of UNDP/GEF projects being concluded in the country for substantially shifting from a demonstrative approach, focused on few large sites, to a regional approach, aimed at reducing risk and preventing the release of POPs coming from contaminated sites in several provinces (Nghe An, Quang Binh and Binh Duong). This ambitious objective is now pursuable thank to the effort already made in the country by the GoV, the UNDP/GEF project on dioxin and pesticide, and other donors' projects on the establishment of a contaminated site inventory, development of preliminary risk assessment criteria for contaminated sites, demonstration of the sites remediation.

In addition, the project will remove the barrier (l) related to the implementation of the Minamata convention requirements on mercury by bringing technical assistance on the inventory of mercury and identifying a roadmap for addressing the issue of mercury added materials and goods.

Last but not least, the project will address barrier (m) to leverage a substantial amount of funds for coordinated inter-ministerial activities on POPs.

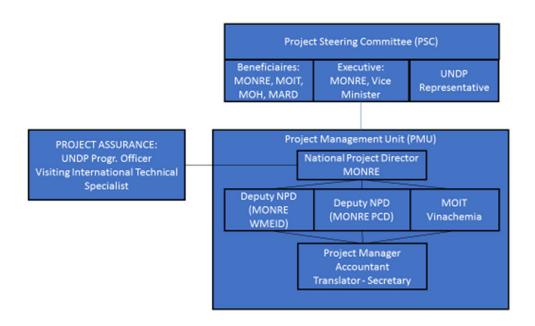
3.4. Project implementation arrangements

The project implementation is based on the principles of the Harmonized Programme and Project Management that have been agreed between the Government of Vietnam and UN agencies to guide the management and implementation of UN-supported projects under the National Implementation Modality (NIM). The latter is defined as a cooperative operational arrangement whereby governments and designated national institutions assume responsibility for the management of UN-financed technical cooperation programmes and projects. The

objective of NIM is to ensure that UN-financed projects are managed and implemented by government and national institutions as an integral part of their development programmes, whilst ensuring that UN policies and procedures underlying development cooperation and programme management are adhered to. By this token, NIM promotes ownership, accountability, national capacity development, and sustainability of UN-supported interventions.

The following project management arrangements have been agreed at inception:

Figure 1: Project implementation arrangements



The project management is constituted by the Project Steering Committee (PSC) and the Project Management Unit (PMU).

The Project Steering Committee has been established by decision of the Ministry of Environment and Natural Resources⁶. PSC has 11 members from MONRE and other line ministries (MOIT, MARD, MOH) and DONRE from two provinces (Nghe An and Binh Duong). PSC has been responsible for supervision and monitoring of the project implementation to ensure the objectives, progress, quality and use of project resources as specified in the approved Project Document.

PMU has been established by the decision of the Director General of Vietnam Environment Administration⁷. The decision stipulates the task of management of the project implementation according to the objectives, progress, quality and sources as well as membership of PMU. In particular, the Decision designates the Vietnam Environment Administration (VEA/MONRE) as the lead Agency for PMU and also designates membership of PMU.

⁶Decision No. 1323/QD-BTNMTdated 14 June 2016

⁷ Decision No. 468/QĐ- TCMT dated 29 April 2016

Pursuant to the Decision, all members of PMU are officials of VEA. However, since the Component 4 of the project relates to mercury, the initial arrangement at project preparation stage was that the Vietnam Chemicals Agency (VINACHEMIA/MOIT) should be in charge of all the mercury related activities. This was adjusted during the project inception activities when an agreement was reached in such a way that some of the mercury related activities (the ones more relevant to environmental protection) were placed under the responsibility of VEA/MONRE, whilst some of the non/mercury activities related to chemical management (more specifically, the activities associated with GHS implementation) were placed under the control of VINACHEMIA. The above arrangement was formalized through a detailed Agreement of Cooperation signed on 2 April 2015. The Agreement outlined main cooperation lines in the project activities and designated VEA/MONRE as the Lead Agency for the project while the VINACHEMIA/MOIT as the main Cooperating Agency. At the same time, the Agreement stipulates that VINACHEMIA/MOIT is designated to lead implementation of some project activities (namely Outputs/Activities 1.2.2, 1.2.3. and 4.1.3).

3.5. Project timing and milestones

The Vietnam POPs and Sound Harmful Chemicals Management Project was approved for implementation as a full-size GEF project on 18 September 2014 for duration of 36 months. From that on, a relatively long and complicated sequence of events followed that led to start of the project activities in November 2016. The specific timeline of the project is summarized in Table 2 below.

Table 2:Timeline for the approval and start-up of the project

| Date | Action | |
|----------------|---|--|
| Sept 18,2014 | GEF approval (CEO letter) | |
| Aug 20, 2015 | Prime Minister's approval of the project ⁸ | |
| Dec 18, 2015 | MONRE approval on Project Document | |
| Jan 29, 2016 | MONRE and UNDP signed the Project Document (marking officially start of the project | |
| | implementation, planned for 3 years, from Jan 2016 to Dec 2018) | |
| April 14, 2016 | Project Inception Workshop | |
| April 29, 2016 | Establish Project Management Unit (PMU) | |
| May 13, 2016 | License date of using project's seal | |
| May 30,2016 | Date of opening project's account | |
| May 31, 2016 | Date of issuing project's tax code | |
| June 10, 2016 | Promulgate operating regulations of PMU | |
| June 14, 2016 | Establish Project Steering Committee (PSC) | |
| Aug 29, 2016 | Establish PMU, The Ministry of Industry and Trade Component | |
| Oct 01, 2016 | Contracts for staffing of PMU signed (three full-time staff) | |
| Oct 17, 2016 | Contract was signed between project implementing partner- VEA/MoNRE and co- | |
| | implementing partner- Chemical Department/MOIT | |
| Nov 16, 2016 | 1 st Annual WP signed (marking start of project activities) | |

The GEF project grant approved for the project amounts to US\$ 2,550,000 with total cofinancing commitment of US\$11,050,000. The co-financing is composed of contributions from

3.6. Main project stakeholders

The main project stakeholders of the project are as follows:

⁸Decision No. 3310/QĐ-BTNMT dated December 18, 2015 of Minister of Natural Resources and Environment on approval of Project Document of "Vietnam POPs and Sound Harmful Chemicals Management Project".

- Vietnam Environment Administration under the Ministry of Natural Resources and Environment (VEA/MONRE)
- Vietnam Chemicals Agency under the Ministry of Industry and Trade (VINACHEMIA/ MOIT)
- Ministry of Agriculture and Rural Development (MARD)
- Provincial People's Committees (PPC) of Nghe An, Quang Binh and Binh Duong
- Provincial Departments of Natural Resources and the Environment (DONREs)
- Provincial Departments of Industry and Trade (DOITs)
- Ministry of Health (MOH)
- Ministry of Science and Technology (MOST)

VEA under MONRE is the main national implementing partner and the national focal point for the Stockholm Convention in Vietnam. VEA has significantly contributed to the design and drafting of the project. Two departments from VEA are directly involved in the project, namely the Pollution Control Department (PCD) and the Waste Management and Environment Improvement Department (WENID).

Amongst the main responsibilities for PCD is promulgation of legal documents and national policies in the field of pollution control, prevention and control of the pollution of soil, water, and air environment as well as monitoring of environmental quality and establishing environmental technical standards and criteria⁹.

WENID main responsibilities are managing ordinary and hazardous wastes, remedying environmental pollution and improving environmental quality, protecting environment of river basins, coastal zones, seas and islands in nationwide as the provisions of the state law¹⁰.

VINACHEMIA under MOIT is the co-implementing partner of the project. Amongst VINACHEMIA's main responsibilities are setting up the strategy, master plan, long-term development of the chemical industry, promulgation of technical regulations for companies and organizations handling chemicals, management of data of chemicals including toxic chemicals and precursors, as well as management of GHS and chemical safety information¹¹.

Full stakeholder map is provided in Annex 2.

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⁹ Decision No.1512/QD-TCMT dated November 25th2014 to define the functions, tasks, powers and organizational structure of Department of Pollution Control

 ¹⁰ Decision No.1515/QD-TCMT dated November 25th2014 to define the functions, tasks, powers and organizational structure of the
 Department of Waste Management and Environment Promotion
 11 Decision No 1008/QD-BCT dated 25th February, 2009 of Minister of MOIT on Defining the functions, tasks, powers and organizational

Decision No 1008/QD-BCT dated 25th February, 2009 of Minister of MOIT on Defining the functions, tasks, powers and organizational structure of Vietnam Chemicals Agency

4. FINDINGS

This section brings a summary of empirical facts based on data collected during the evaluation. The MTR team paid particular attention to cross-verification of the evaluative evidence using multiple sources of information and, to the extent possible, avoid overreliance on opinions obtained during the interviews.

4.1. Project Strategy

The MTR team conducted an analysis of the design of the project as outlined in the Project Document in order to identify whether the project strategy is proving to be effective in reaching the desired results. In doing so, the evaluators assessed the extent to which the project addresses country priorities and is country-driven. Furthermore, MTR team evaluated the extent to which the project objectives are consistent with the priorities and objectives of the GEF.

4.1.1. Project Design

The project objective is the continued reduction of environmental and health risks through POPs and harmful chemicals release reduction achieved by provision of an integrated institutional and regulatory framework covering management and reporting of POPs and harmful chemicals within a national sound chemicals management framework and targeted development of POPs contaminated sites management capacity. The project builds on experience from GEF-4 projects and specifically built a management plan at provincial level to assess risk and implement release reduction measures at all the POPs contaminated sites in two provinces.

The specific project objectives are to strengthen national capacity on safety management of POPs and harmful chemicals; control and reduce release of POPs/PTS to environment from POPs/PTS contaminated site; perform a preliminary inventory of mercury sources and draft a roadmap on mercury reduction.

In the area of national strategic planning documents, the project is aligned with the National Socio-Economic Development Strategy for 2011-2015 and the National Strategy on Cleaner Industrial Production to 2020.

The project also contributes to the objectives of the National Strategy on Environment Protection to 2020 that stipulates the following requirements:

- Prioritize pollution prevention and control;
- Improve the environment in polluted and deteriorated areas to better living conditions for people;
- *Strictly apply the registration of toxic chemicals;*
- Plan and gradually conduct environment improvement and recovery, prioritizing land areas within or near residential areas and water resources, or those that can directly influence people's health.

In the field of pesticide contamination management, the project is aligned with the following Decisions of the Government:

Decision 1946/QĐ-TTg "Approving the Plan to treat and prevent environmental pollution caused by pesticides stockpiles all over the nation" (December 2010);

Decision 1206/QD-TT "National Target Program on pollution remedy and environmental improvement" (September 2012). The Decision allocated 1,010 billion Vietnamese Dong (48.475 million USD) for the disposal of obsolete pesticide and clean-up of sites contaminated by pesticides for the period 2012-2015;

Regarding the obligations of Vietnam as Party to the Stockholm Convention, Vietnam's National Implementation Plan (NIP) under the Stockholm Convention establishes that

the core approach shall be "pollution prevention" with recognition of POPs as posing long-term potential hazards to human health and the environment.

NIP implementation road map is based on phasing into three periods. The project is aligned with nine of the thirteen Priority Programmes phased into the first period 2006-2010:

- Develop and finalize the legal framework, policies, laws, and standards for POPs
- Raise stakeholders' and public awareness of POPs issues and the NIP implementation
- Survey, inventory, and assess POPs current status and POP-contaminated sites
- Manage, treat, and phase out POPs pesticide stockpiles
- Treat sites contaminated with POPs pesticides and PCBs
- Build a national information system on POPs
- Build capacity for POPs monitoring and analysis, initially develop and implement a monitoring program on POPs pollution, including unintentionally produced POPs
- Research on technologies for POPs control and treatment
- Carry out communication activities, encourage and guide manufacture and trading enterprises, as well as communities to take measures to minimize unintentional production of POPs from production and everyday activities

The project is also relevant to five of the six NIP Priority Programmes phased for the period 2010-2015, namely:

- Continue the treatment of sites contaminated with PCBs and POPs pesticides.
- Continue to enhance the control and monitoring system for import, use, and transportation of prohibited pesticides;
- Continue communication activities, encourage and guide manufacture and trading enterprises, as well as communities to take measures to minimize unintentional production of POPs
- Continue raising awareness and setting up a cooperation mechanism for stakeholders and the public to increase their participation in the sound management of POPs and the mitigation of their impacts.
- Strengthen POPs monitoring activities and research on the impacts of POPs and pesticides on human health, so as to promote effective prevention and treatment

The project is also highly relevant to the goals and priorities promulgated in the Decision No. 1598/QD-TTg dated 17 October 2017 of the Prime Minister, promulgating the National Plan for Implementation of the Stockholm Convention on Persistent Organic Pollutants up to 2025, with an orientation to 2030.

The updated NIP targets to ensure strict safety lifecycle management and proper treatment of the POPs and to reduce disposal and eliminate the production and use of the POPs in Vietnam for the benefit of human health and the environment and towards the sustainable development.

According to the implementation plan, the Government will work to improve institutional capacity and legal framework for the management and elimination of POPs, reinforce its

expertise in monitoring, detecting and managing POPs and enhance awareness of the POPs and their harmful effects to the environment among involved parties.

Even though the evaluated project was developed and financed under GEF-5, its objective is also highly relevant for the current GEF-6, particularly for the long-term goal of the GEF-6 Chemicals and Waste Strategy:

to prevent the exposure of humans and the environment to harmful chemicals and waste of global importance, including POPs, mercury and ozone depleting substances, through a significant reduction in the production, use, consumption and emissions/releases of those chemicals and waste.

It also responds to the following GEF-6 Programmes:

Programme 1: Develop and demonstrate new tools and economic approaches for managing harmful chemicals and waste in a sound manner; and

Programme 3: Reduction and elimination of POPs

Programme 4: Reduction or elimination of anthropogenic emissions and releases of mercury to the environment

The MTR team found the project highly relevant and in line with the priorities and needs of Vietnam as the signatory party to the Stockholm and Minamata Conventions. The Vietnam Government by adoption and update of NIP has demonstrated strong commitment to reduce and phase-out POPs in order to mitigate environmental degradation caused by POPs and resulting adverse consequences to human health. Through NIP the Government also expressed the need for conducting the assessment, and treatment of pesticide-contaminated sites, conduct inventories of sites contaminated by industrial POPs. NIP also highlighted some weaknesses in the overall policy and regulatory frameworks and the need for institutional and regulatory development, capacity building, and public awareness in the area of POPs.

The project is also fully compliant with the current GEF-6 Programming Directions, namely with Programme 1 to "Develop and demonstrate new tools and economic approaches for managing harmful chemicals and waste in a sound manner", Programme 3 on "Reduction and elimination of POPs" and Programme 4 on "Reduction or elimination of anthropogenic emissions and releases of mercury to the environment.

Another proof of relevance of the current project to the country needs and priorities is interest and strong support of international development community to address challenges related with management and reduction of POPs and pesticides in Vietnam.

Projects related to the Stockholm and Minamata Conventions implemented in Vietnam in the last 10 years are listed in Table3a below. Apart from the national projects, Vietnam has also been participating in two regional projects related to the Stockholm Convention.

Table 3a: Overview of national projects related to the Stockholm and Minamata Conventions

| Donor/IA | Type | Project Title | Implementation ¹² | Budget (US\$) ¹³ |
|-----------|----------|---|------------------------------|--------------------------------|
| GEF/UNDP | National | Environmental Remediation of Dioxin Contaminated Hotspots in Vietnam | 2009-2014 | 4,977,000 |
| GEF/WB | National | PCB Management Demonstration Project | 2008-2012 | 8,085,000 |
| GEF/UNDP | National | Building capacity to eliminate POP pesticides stockpiles in Vietnam | 2009-2013 | 4,300,800 |
| GEF/UNIDO | National | Introduction of BAT/BEP methodology to demonstrate reduction or elimination of unintentionally produced | 2010-2011 | 800,000 |

¹² Implementation periods as approved

1.

¹³ Budget as provided by the donor not including co-financing

| | | persistent organic pollutants (UP-POPs) releases from the industry in Vietnam | | |
|-----------|----------|---|-----------|------------------|
| GEF/UNDP | National | Updating Vietnam's National Implementation Plan for the Stockholm Convention on Persistent Organic Pollutants | 2012-2014 | 225,000 |
| GEF/UNIDO | National | Minamata Convention Initial Assessment in Vietnam | 2015-2017 | 500,000 |
| JICA/JICA | National | The Project for Strengthening Chemicals Management in Vietnam | 2015-2018 | 3,000,000 |
| GEF/UNDP | National | Vietnam POPs and Sound Harmful Chemicals Management | 2015-2018 | 2,550,000 |
| GEF/UNEP | Regional | Implementation of the POPs Monitoring Plan in the Asian Region | 2015-2019 | Not allocated |
| GEF/UNIDO | Regional | Demonstration of BAT and BEP in open burning activities in response to the Stockholm Convention on POPs | 2015-2020 | Not allocated |

The MTR team consider the general objective of the project consistent with the need and priorities of the country. Based on the compliance with the key national priorities, the evaluators also noted the strong original country ownership of the project demonstrated by the request and approval of the project for implementation according to the National Implementation Modality (NIM).

4.1.2. Results Framework/Logframe

The project's overall objective is continued reduction of environmental and health risks through POPs, mercury and harmful chemicals release and exposure reduction achieved by provision of an integrated institutional and regulatory framework. For achievement of this objective, the Project Document defined a comprehensive results framework composed of four project components, eight outcomes and twenty-six outputs/activities. At the project inception meeting in April 2016, the participating Government agencies discussed amendment of the project baseline and, consequently, revision of the original outcomes and outputs in the project results framework. The changes of the logical framework at the project inception are summarized in Table 4 below.

Table 4: Summary of changes in the project logical framework at the Inception Workshop

| Result No. | Definition in the Project Document | Definition at project inception |
|---------------|--|---|
| | | |
| Output 1.1.3 | Enacted legal instrument in the form of | Strengthen enforcement of legal instrument in the Laws |
| | amended Laws or Decrees/regulations | or Decrees/regulations in place, including amendment |
| | defining linkage between these laws and the | of Law and regulation as well as additional tools and |
| | regulatory instruments in place | sanctions if necessary, toward harmonization and |
| | | simplification. |
| Output 1.2.2 | 30 representatives of VEA, VINACHEMIA, | Conduct an initial survey of GHS implementation in |
| | Department of Water Resources | Vietnam, 30 professionals from VEA, VINACHEMIA, |
| | Management, national customs authorities | Department of Water Resources Management, National |
| | and industrial stakeholders trained in | Customs Authorities and industrial stakeholders trained |
| | implementation of chemicals classification | in implementation of chemicals classification and |
| | and labelling in global harmonized system | labelling in global harmonized system and adaptation |
| | and adaptation of the EU REACH/ROSH | of the EU REACH/ROSH approach for application in |
| | approach for application in Viet Nam | Vietnam |
| Output 1.2.3. | Strengthened application of chemical risk | Facilitate the Implementation of common national |
| | assessment approach for environmental and | procedures for chemicals environmental and health risk |
| | health risk assessment and release reduction | |

| Result No. | Definition in the Project Document | Definition at project inception |
|--------------|--|---|
| | | |
| | enforcement including training of 30 | assessment. Conduct a Pilot of processes for risk |
| | professionals from VEA, VINACHEMIA and | assessment of mercury in a priority sector. |
| | Ministry of Health will be implemented | |
| Output 2.1.3 | Upgraded monitoring programs in key areas | Contribute to the State of Environment Report on |
| | where strengthening is required, developed | Chemicals/Hazardous Chemical and POP/PTS |
| Output 3.2.4 | N.A. | Clean up of the Lam Hoa site in Quang Binh |
| Outcome 4.1 | Mercury inventory results contribute to the | Mercury baseline source and release inventory |
| | development of awareness raising materials | developed |
| | and the identification of national activities to | |
| | ratify and implement Minamata Convention | |

Some of the changes, namely reformulation of Output 1.2.2. and Outcome 4.1. as well as inclusion of new Output 3.2.4, originated from the updated project baseline, e.g. the clean-up of the Lam Hoa site was added as the new Output 3.2.4 as a reaction to discovery of the Lam Hoa site under the previous UNDP project on elimination of POPs pesticide stockpiles.

The reason for the reformulation of Output 1.1.3 appears to be better definition of the contents of the output, namely to put emphasis on enforcement aspects of the amended laws/decrees. However, the text of the output is still not clear and would benefit from further refinement to better specify the output.

Output 1.2.2 was amended by insertion of an initial GHS survey in addition to the training on GHS implementation that improves the definition of the output.

The original Output 2.1.3. (upgraded monitoring programmes) was deleted and replaced by the new text on contribution to the State Environment Report on Hazardous Chemicals and POPs/PTS. The evaluators consider the change improves internal consistency of the Outcome 2 and corresponding outputs.

Apart from the above changes that were incorporated into the revised project results framework attached to the Inception Report, the body of the IR also contains the following proposal for amendment of the project results framework:

- Output / Activity 3.3.1 Environmental assessment and Environmental Management plan;
- Output / Activity 3.3.2 Disposal of 50 t of POPs pesticide (DDT) and safeguarding / remediation of around 100 t of contaminated material;

The above two changes did not appear in the revised project results framework.

The MTR team performed critical analysis of the logframe in order to establish whether it has the necessary elements and whether it enables measurement of success and progress to success. For measuring the achievements of the project, the logical framework contains indicators and targets. The indicators together with the targets should serve two main purposes, namely i) to facilitate monitoring and eventual conduct of remedial actions, and ii) to facilitate end of the project evaluation to determine delivery of outputs and progress made in achieving goal and purpose.

The evaluators consider the indicators and targets contained in the logframe are designed well to facilitate end of the project evaluation but not adequate to allow for proper adaptive management and monitoring of progress on the way to project results. In theory, mid-term evaluations can propose changes to the logical framework and reformulation of indicators and

targets. This particular case would require a major redrafting of the project indicators and targets which exceeds the scope of this MTR. Moreover, such redrafting would not have much use at this stage of the project implementation.

4.2. Progress Towards Results

4.2.1. Progress towards outcomes analysis

The information presented in this section has been sourced from the Annual Work Plans (AWP) 2016, 2017 and 2018 and Annual Progress Reports (APR) 2016 and 2017 supplemented with information collected during the MTR mission to Vietnam.

The progress towards the eight project outcomes is presented for each outcome in a separate table

Table 5: Achievements at MTR for Outcome 1.1

| Output / Activity 1.1.1 Output / Activity 1.1.1 Detailed review and gap analysis of Laws on Chemicals and Environmental Protection with respect to coverage of POPs, PTS and environmentally damaging chemicals management including mercury, conducted. A regulatory improvement plan developed. Output / Activity 1.1.2 Regulatory improvement plan developed. Output / Activity 1.1.2 Regulation applicable to the Stockholm Convention amendments on "new" POPs including bans where not yet in place, developed. Output / Activity 1.1.3 Strengthen enforcement of legal instrument in the Laws or Decrees/regulations in place, including amendment of Law and regulation as well as additional tools and sanctions if necessary, toward harmonization and simplification. Output / Activity 1.1.4 Output / Activity 1.1.4 Output / Activity 1.1.4 Output / Activity 1.1.5 Couptut / Activity 1.1.5 Output / Activity 1.1.5 Output / Activity 1.1.5 Output / Activity 1.1.6 Output / Activity 1.1.6 Output / Activity 1.1.7 Output / Activity 1.1.7 Output / Activity 1.1.8 Output / Activity 1.1.8 Output / Activity 1.1.9 Output / Activity 1.1.9 Output / Activity 1.1.9 Output / Activity 1.1.9 Output / Activity 1.1.8 Output / Activity 1.1.9 Output / Activity 1.1.5 Eastablishment and enforcement of the end of the regulation of t | Outcome 1.1. Overall policy framework a of POPs and PTS through life cycle mana | | | gement |
|--|---|---|---|--------|
| Dutput / Activity 1.1.1 Dutput / Activity 1.1.2 Output / Activity 1.1.2 Output / Activity 1.1.3 Strengthen enforcement of legal instrument in the Laws or Decrees/regulations in place, including amendment of Law and regulations and additional tools and sanctions if necessary, toward harmonization and simplification. Output / Activity 1.1.3 Output / Activity 1.1.3 Strengthen enforcement of legal instrument in the Laws or Decrees/regulations in place, including amendment of Law and regulation as well as additional tools and sanctions if necessary, toward harmonization and simplification. Output / Activity 1.1.3 Output / Activity 1.1.3 Output / Activity 1.1.4 Output / Activity 1.1.5 Output / Activity 1.1.5 Output / Activity 1.1.5 Output / Activity 1.1.6 Output / Activity 1.1.6 Output / Activity 1.1.7 Output / Activity 1.1.8 Output / Activity 1.1.8 Output / Activity 1.1.4 Output / Activity 1.1.5 Output / Activity 1.1.5 Output / Activity 1.1.5 Each integrating environmental protection for chemical activities, ii) scheduled wastes containing toxic chemicals, iii) output in change in the change of the ch | | | | Rating |
| Regulation applicable to the Stockholm Convention amendments on "new" POPs including bans where not yet in place, developed. By the end of the project, an integrated legal document in the form of decree or circular developed/amended to coordinate the enforcement of legal instrument in the Laws or Decrees/regulations in place, including amendment of Law and regulation as well as additional tools and sanctions if necessary, toward harmonization and simplification. Output / Activity 1.1.4 Output / Activity 1.1.4 Output / Activity 1.1.5 Decreasing to a containing toxic chemicals methodology, iv) health risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures, v) Integration of monitoring requirement for specific industrial sectors Output / Activity 1.1.5. By the end of the project, an integrated legal document in the form of decree or circular developed/amended to coordinate the enforcement of SC provisions among different Ministries. A comprehensive technical guideline developed covering: i) general environmental protection for chemical activities, ii) scheduled wastes containing toxic chemicals methodology, iv) health risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures, v) Integration of monitoring requirement for specific industrial sectors Output / Activity 1.1.5. By the end of the project, and the project in developed covering: i) general environmental emergency and response, environmental incident of hazardous environmental incident of hazardous environmental incident of hazardous environmental incident of hazardous environmental environmental energency and response, environmental energency and response, environmental energency and response, environmental environmental | Detailed review and gap analysis of Laws on Chemicals and Environmental Protection with respect to coverage of POPs, PTS and environmentally damaging chemicals management including mercury, conducted. A | Gap analysis completed within 20 months from project starting. Regulatory improvement plan completed and submitted within | Law on Environment Protection and Law on Chemicals incl. related regulations under review Expected completion May 2018 Stakeholder consultation workshop | MS |
| Strengthen enforcement of legal integrated legal document in the form of decree or circular developed/amended to coordinate the enforcement of SC provisions among different Ministries. Output / Activity 1.1.4 Output / Activity 1.1.4 Guidelines integrating environmental control of POPs and PTS within the overall chemicals management framework, including coverage of: i) general environmental protection for chemical activities, ii) scheduled wastes containing toxic chemicals, iii) environmental risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures, v) Integration of monitoring requirement for specific industrial sectors Output / Activity 1.1.5. Establishment and enforcement of the regulatory framework for POPs/PTS tracking tool and a PRTR system through by opert and fraffing the PRTR regulation, by establishment of an inter-ministerial | Output / Activity 1.1.2 Regulation applicable to the Stockholm Convention amendments on "new" POPs including bans where not yet in place, developed. | Environmental Protection, Law on Chemicals, Waste regulations, Pesticide law) or their associated norms are amended for compliance with the SC requirements. | on Implementation of Environment Protection Law developed Decision on Environment Incident Response in progress, expected in June 2018 | S |
| Guidelines integrating environmental control of POPs and PTS within the overall chemicals management framework, including coverage of: i) general environmental protection for chemical activities, ii) scheduled wastes containing toxic chemicals, iii) environmental emergency and response, environmental risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures, v) Integration of monitoring requirement for specific industrial sectors Output / Activity 1.1.5. Establishment and enforcement of the regulatory framework for POPs/ PTS tracking tool and a PRTR regulation, by establishment of an inter-ministerial guideline developed covering: i) general environmental protection incl. prevention and response to environmental incident of hazardous chemicals received by PMU and TA, Final draft for submission to PCD /MONRE expected in June 2018 MS AMS Consultants recruited to review the Regulation on implementation and enforcement of POPs monitoring and PRTR system MS Consultants recruited to review the environmental protection incl. prevention and response to environmental incident of hazardous chemicals received by PMU and TA, Final draft for submission to PCD /MONRE expected in June 2018 MS Consultants recruited to review the environmental protection incl. prevention and response to environmental incident of hazardous chemicals received by PMU and TA, Final draft for submission to PCD /MONRE expected in June 2018 MS Consultants recruited to review the Regulation on implementation and enforcement of POPs monitoring and PRTR system include international experience, completion expected in June 2018 | Strengthen enforcement of legal instrument in the Laws or Decrees/regulations in place, including amendment of Law and regulation as well as additional tools and sanctions if necessary, toward harmonization and | integrated legal document in the form of decree or circular developed/amended to coordinate the enforcement of SC provisions among different | Emissions from Steel Industry and NTR on Wastewater from Steel Industry) Final report on regulatory improvement plan on POP/PTS management almost completed, will | S |
| Output / Activity 1.1.5. Establishment and enforcement of the regulatory framework for POPs/ PTS tracking tool and a PRTR system through support in drafting the PRTR regulation, by establishment of an inter-ministerial By the end of the project, a circular drafted and submitted to GoV for approval related to implementation and enforcement of POPs monitoring and PRTR system, include international experience, completion expected in June 2018 Consultants recruited to review the Regulation on implementation and enforcement of POPs monitoring and PRTR system, include international experience, completion expected in June 2018 | Guidelines integrating environmental control of POPs and PTS within the overall chemicals management framework, including coverage of: i) general environmental protection for chemical activities, ii) scheduled wastes containing toxic chemicals, iii) environmental emergency and response, environmental risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures, v) Integration of monitoring requirement for specific | guideline developed covering: i) general environmental protection for chemical activities, ii) scheduled wastes containing toxic chemicals, iii) environmental emergency and response, environmental risk assessment of waste containing toxic chemicals methodology, iv) health risk assessment for chemical wastes procedures v) monitoring plans and obligation for industrial sectors | environmental protection incl. prevention and response to environmental incident of hazardous chemicals received by PMU and TA, Final draft for submission to PCD | MS |
| Integrating POPs / PTS requirement in the database design, drafting guidelines for PRTR enforcement and PRTR related activities Demonstration of an Information Management Information Management Demonstration of an Information Management | Establishment and enforcement of the regulatory framework for POPs/ PTS tracking tool and a PRTR system through support in drafting the PRTR regulation, by establishment of an inter-ministerial coordinating group on PRTR regulation, Integrating POPs / PTS requirement in the database design, drafting guidelines for PRTR enforcement and | By the end of the project, a circular drafted and submitted to GoV for approval related to implementation and enforcement of POPs monitoring and PRTR system to ensure sustainability of the PRTR related activities Demonstration of an Information Management | Regulation on implementation and enforcement of POPs monitoring and PRTR system, include international experience, completion expected in June 2018 Two PRTR technical guidelines under development, completion expected in | MS |
| implementation System to support PRTR. Outcome 1.1 MS | | System to support PRTR. | | MS |

Table 6: Achievements at MTR for Outcome 1.2

| requirements Result | End-of-Project Target | Status at MTE | Rating |
|--|---|---|--------|
| Output / Activity 1.2.1 Active participation of Vietnam in the International Conference on Chemicals Management. | By the end of the project 2 representatives of GoV participated in ICCMs (for 2 years) to provide GoV more opportunities to exchange and discuss on country specific issues of chemical management. | Planned participation of 4 people at ICCM conference in US in July 2018 | MS |
| Output / Activity 1.2.2 Conduct an initial survey of GHS implementation in Vietnam, 30 professionals from VEA, VINACHEMIA, Department of Water Resources Management, National Customs Authorities and industrial stakeholders trained in implementation of chemicals classification and labelling in global harmonized system and adaptation of the EU REACH/ROSH approach for application in Viet Nam | By the end of the project, a survey on GHS implementation in Vietnam is completed. By the end of the project, at least 30 professionals from various government agencies (VEA, VINACHEMIA, Department of Water and Resource Management, National Customs Authorities, etc.) trained on the implementation of chemicals management with specific reference to POPs in downstream legislation, GHS and EU legislation on chemical management. | TOR for survey of GHS implementation accepted by UNDP in April 2018 Consultants for facilitation of the training on implementation of POPs management recruited Completion expected in about 6 months | MS |
| Output / Activity 1.2.3. Facilitate the Implementation of common national procedures for chemicals environmental and health risk assessment. Conduct a Pilot of processes for risk assessment of mercury in a priority sector. | By the end of the project: A sector related to mercury for piloting risk assessment selected. A risk assessment pilot activity in the selected mercury sector conducted. Risk assessment report drafted and disseminated. At least 30 professionals from VEA, VINACHEMIA and Ministry of Health trained on risk assessment with specific focus on POPs and mercury. | TOR for environmental and health risk assessment and related training accepted by UNDP April 2018 The lighting sector selected for piloting the adoption of risk assessment criteria in decision making; Training of professionals from VEA, VINACHEMIA and Ministry of Health on risk assessment with specific focus on POPs and mercury scheduled for 3Q 2018 | MS |
| Output / Activity 1.2.4 Market based policy initiative developed to promote reduction in POPs releases and POPs disposal through development of national POPs management service provider capability on a commercial basis through private public partnerships | Within the first two years of the project a market-based policy initiative aimed at ensuring sustainability of hazardous waste and hazardous chemicals management developed and approved, By the end of the project, a public private partnership for the reduction or monitoring of POPs releases and for promoting POPs disposal | A feasibility study report on market based or user/customer- driven policy initiative expected in June 2018 Development of the market-based policy expected from 3Q 2018 will take couple of months Public/Private partnership for the reduction and/or monitoring of POPs releases and for promoting POPs disposal to be identified by the feasibility study | MU |

Table 7: Achievements at MTR for Outcome 2.1

Outcome 2.1

Outcome 2.1: National institutions provide comprehensive and coordinated ambient environment and receptor POPs /PTS monitoring that is consolidated into a national database and utilized for high quality reporting to the GoV/National Assembly and the Convention End-of-Project Target Result **Status at MTR** Rating Output / Activity 2.1.1 A Baseline for all POPs and PTS (mercury) 1st draft of the status report on monitoring of POPs and Ambient environment (air, water, soil) established for ambient environment (air, water, soil) and receptors (human, biota, food), based on PTS (mercury) established and receptor (human, biota, food) POPs and PTS baseline established the collection and review of existing baseline and for ambient environment (air. risk-based standards. against which future monitoring can water, soil) and receptors be measured and reported. (human, biota, food) received A list of laboratories under MONRE / DONRE in April 2018 Output / Activity 2.1.2. Comprehensive assessment and which are able to monitor and analyse various Completion expected in May 2018 inventory of POPs/PTS monitoring POPs and PTS formulated to provide information capacity, identify needs of POPs/PTS in key areas. Sampling capacity and equipment for both MS environmental media and industrial sources; List of POPs that can be analyzedwith respective analytical methods; List of POPs analyzed in the preceding years and respective analytical methods; Number of certified professionals working at each lab; Current accreditation; Participation in national or international intercalibration. Others Output / Activity 2.1.3. Since 2018, the State of Environment Report in General Section already done Contribute to the State of Environment Vietnam will always include a section on for 2017 the State of Report on Chemicals/Hazardous Chemicals in the Environment. **Environment Report** S Chemical and POP/PTS More detailed section for 2018 Report to be completed in December 18/January 19

MS

Table 8: Achievements at MTR for Outcome 2.2

| Outcome 2.2: National POPs/PTS laboratory network for support of ambient environment and receptor monitoring certified/accredited | | | |
|---|---|---|--------|
| Result | End-of-Project Target | Status at MTR | Rating |
| Output / Activity 2.2.1 Up to 2 laboratories accredited to international standards to support POPs/PTS monitoring | At least 2 laboratories accredited to international standards on the adoption for sampling and analysis on new POPs and PTs, following relevant ISO procedures (i.e. ISO/IEC 17025) and integrated into a laboratory calibration network; Up to 40 laboratory technicians received updating training | Selection of laboratories for basic assessment and accreditation expected in June 2018 Standardization body not yet identified | Ū |
| Output / Activity 2.2.2 Up to 40 relevant national and provincial government staff will be trained on POPs/PTS monitoring and reporting following international standards and requirements | Up to 40 relevant national and provincial government staff trained on POPs/PTS monitoring and reporting following international standards and requirements. | Needs assessment report on labs capacity with a detailed list of labs expected in June 2018 Based on needs assessment 3 general training courses for Northern, Central and Southern regions to be scheduled; 3 technical trainings on specific POPs to be scheduled Expected to be completed in December 2018 | U |
| Output / Activity 2.2.3 A POPs/PTS database developed at provincial level and PRTR reporting system operational and linked to the POPs tracking tool and data submitted to Convention Secretariat. | A PRTR reporting system and associated database covering: data for industrial sources in Binh Duong responsible to at least 20% of the priority sources in the province; all POPs monitoring data available countrywide; POPs from inventoried contaminated sites. | TOR for the inventory of industrial sources developed UNDP took over the recruitment Completion expected May/June 2019 | MS |
| Outcome 2.2 | | | U |

 Table 9: Achievements at MTR for Outcome 3.1

| Outcome 3.1 Key policies, regulations and technical guidlines for management of POPs contaminated sites are in place | | | |
|--|--|--|--------|
| Result | End-of-Project Target | Status at MTR | Rating |
| Output / Activity 3.1.1: Supporting regulations and standards for contaminated sites covering requirements for: i) contaminant levels to trigger action, contaminant POPs levels; ii) future land use cleanup level requirements for POPs contamination in soil and water; iii) reporting; and iv) care/custody and liability assignment, developed. | Technical regulation for industrial POPs for which cleanup target levels in soil are needed will be established | 1st draft of the technical regulation for POP pesticides contaminated sites developed Final report from 2 NCs expected in May/June 2018 | MS |
| Output / Activity 3.1.2 Risk management procedures and guidelines for contaminated sites developed. | Within one year from project starting, risk management procedures for POPs contaminated soil, taking into account specific procedures for industrial sites and craft village contaminated sites, will be developed. A guideline for POPs contaminated sites developed to cover: Clean-up requirements for specific land – uses; Technology selection criteria; Reporting requirements; Care/custody and liability requirement | Circular 30/2016 on guidelines for contaminated site assessment and site remediation assessment has been issued TOR for risk management procedures for POPs contaminated sites under development Procurement pending on approval of PP (in June 2018), Implementation time about 9 months | U |
| Outcome / Activity 3.1.3 National consolidated POPs contaminated sites inventory developed and prioritized. | An existing inventory database for POPs contaminated sites/stockpiles integrated and upgraded to comprise information of PCB, new POPs, POPs from industrial contaminated sites/craft village | Contractor selected and recruited 1st draft of the inventories report on DDT/lindane on Ho Chi Minh trail Inventory report on Viet Tri chemical plant under development Completion expected 4 Q 2018 For inventory of POPs industrial contamination in Binh Duong province procurement pending on approval of PP expected in June 2018 Implementation time 9 months | U |
| Outcome 3.1 | 1 | 1 | U |

Table 10: Achievements at MTR for Outcome 3.2

| Output / Activity 3.2.2.5 of the candidate provinces of the candidate province of the selected on the basis of sailability of data (candidate provinces Quang Binh, Ha Tinh, Quang Tir) Output / Activity 3.2.2.5 of the candidate provinces Quang Binh, Ha Tinh, Quang Tir) By the end of the project, at least 50 technical and candidate provinces and decision makers from ministries and ID provinces and decision makers from ministries and ID provinces and created into provinces and remediation practice taking into consideration of contaminated sites management, site assessment, risk reduction and are remediation practice taking into consideration of contaminated sites management, site assessment of the candidate provinces and created into account lessons learnt from GEF4 POPs projects and contaminated sites of the project, at least 50 technical and remediation practice taking into consideration of Portice and contaminated sites of the project, at least 50 technical and in 10 provinces trained on contaminated sites of the project, at least 50 technical and in 10 provinces will be trained on contaminated sites of the project, at least 50 technical and in 10 provinces will be trained on contaminated site of the project, at least 50 technical and in 10 provinces will be contaminated site of the province of the project and cost-off-candidate provinces of the province of the project and cost-off-candidate provinces of the province of the project and cost-off-candidate provinces and remediation and energy properation of the project in provinces that th | Outcome 3.2 Provincial Mana | agement Plan for the Demonstration Provinces | | |
|--|---|---|--|--------|
| detailed POPs-PTS management plans developed for each provinces on the province of the continuation of POPs-PTS management plans developed for the 2 selected provinces on the form of the 2 selected provinces on the province of the selected on the basis of availability of data (candidate provinces Oang Binh, Ha Tinh, Quang Tri) Dutput / Activity 3.2.2.50 technical officers and decision makers from ministries and 10 provinces will be trained on temperature of the province of the selected on the basis of availability of data (candidate provinces Quang Binh, Ha Tinh, Quang Tri) By the end of the project, at least 50 technical and candidate provinces on the provinces of the project and cost-ministries and 10 provinces will be trained on termediation practice taking into account lessons learnt from GEF4 POPs projects. By the end of the project, at least 50 technical and remediation practice taking into account lessons learnt from GEF4 POPs projects. Sometime of the project and cost-effective risk reduction and remediation practice taking into account lessons learnt from GEF4 POPs projects. Sometime of the project and cost-effective risk reduction measures for small from GEF4 POPs projects. Within 18 months after project indicates the require implementation of all risk management measures, risk reduction and energency prepared to key local and within 18 months and provinces understanding about risks posed by POPs to implementation of all risk management measures, risk reduction and energency prepared to key local and within 18 months and provinces and project and cost in the province of the project and cost in the contaminated site and project and cost in the project and cost in the contaminated site and project and cost in the contaminated site and project and cost in the project and cost in the contaminated site and project and cost in the contaminated site and project and cost in the project a | | | | Rating |
| decision makers from ministries and 10 provinces will be trained on contaminated sites management, site assessment, risk reduction and remediation practice taking into account lessons learnt from GEF4 POP project and cost-effective risk reduction and remediation practice taking into account lessons learnt from GEF4 POP project and cost-effective risk reduction measures for small contaminated sites that require involvement of local communities (e.g. management of empty pesticide contaminated sites that require involvement of local communities (e.g. management of empty pesticide contaminated sites in 2 pilot provinces trained at a better implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the residents. At least 01 communication campaigns carried out at each of the community after implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction and emergency responses, and health and safety protection, with active participation of the community after implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the community after implementation of a wareness raising initiatives Output// Activity 3.2,4 Clean-up of the Lam Hoa site in Quang Binh. Output// Activity 3.2,4 Clean-up of the Lam Hoa site in Quang Binh. DOT contaminated oil treated on site.) Site surveys completed. Phase 2 Site Assessment, Phase 3 Site Remediation Assessment, Phase 4 Site Remediation Assessment, Phase 4 Site Remediation Assessment, Phase 4 Site Remediation of avoid 100 t of contaminated waterial POPs pesticide (DDT) safely transported and destroyed in compliance with Stockholm and Basel Convention POPs exploited population POPs contaminated waterial POPs pesticide (DDT) safely transported and destroyed in compliance with St | Support POPs/PTS management plan at the two pilot provinces | detailed POPs/PTS management plans developed for the 2 selected provinces (one for each province), i.e. Nghe An and Binh Duong Province which include: risk-based site prioritization; estimation of POPs/PTS amount, reduction and clean-up/disposal cost; logistic planning; GIS database; criteria for technology selection; financial plan, Nghe An strategic plan replicated to another province to be selected on the basis of availability of data (candidate provinces Quang Binh, Ha Tinh, Quang Tri) | Plan for Nghe An submitted to PPC Approval expected in May 2018 Implementation pending upon approval by PPC,a pilot implementation program will take 6-9 months Workshop to share experience from Nghe An with other 3 provinces scheduled for June/July 2018 Provincial EMP for contaminated sites in 3 provinces (Ha Tinh, Quang Binh and Quang Tri) will commence after the experience sharing workshop Provincial Environmental Protection Plan for Binh Duong pending on approval of 2018 PP Procurement time 3 months (consultant recruitment)+9 months implementation | S |
| awareness raising on contaminated sites and POPs stockpiles, aimed at a better implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the residents. At least 01 communication campaigns carried out at each of the communes and 02 trainings provided to key local authorities to facilitating for better implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction actions carried out with the involvement of the community after implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction actions carried out with the involvement of the community after implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction actions carried out with the involvement of the community after implementation of all risk management measures, risk reduction and emergency responses, and actively involving in development and implementation of active in planetation of a facilitating for better implementation of active participation of the population of the pop | technical officers and decision makers from ministries and 10 provinces will be trained on contaminated sites management, site assessment, risk reduction and remediation practice taking into account lessons learnt from GEF4 POPs projects. | regulatory professionals at national and in 10 provinces trained on contaminated sites management, site assessment, risk reduction and remediation practice taking into consideration of lessons learnt from GEF4 POP project and costeffective risk reduction measures for small contaminated sites that require involvement of local communities (e.g. management of contaminated water, management of empty pesticide containers, PPEs). | progress pending upon approval of 2018 | MS |
| Output// Activity 3.2.4 Cleanup of the Lam Hoa site in Quang Binh. 50t of pure DDT destroyed plus 100 t of highly DDT contaminated soil treated on site.) Site surveys completed. Phase 2 Site Assessment Phase 3 Site Remediation Assessment, Phase 4; Site Remediation Management completed Disposal of 50 t of POPs pesticide (DDT) and safeguarding / remediation of around 100 t of contaminated material POPs pesticide (DDT) safely transported and destroyed in compliance with Stockholm and Basel Convention Phase 5; Site Monitoring and Aftercare completed 50t of pure DDT destroyed plus 100 t of highly DDT or ontaminated on site.) Site surveys completed. Phase 3 Site Remediation Assessment, Phase 4; Site Remediation Management completed Disposal of 50 t of POPs pesticide (DDT) and safeguarding / remediation of around 100 t of contaminated with pesticides collected in December 2017 and packed up in Hung Cha Nan and Hang Hung Nhan's gardens; all transported to and processed at Thanh Cong facility (Hai Duong province), by end of April 2018 + 20 to 30 tons will be collected Mid-long-term remediation design expected by end of April 2018 Design to be base for EPP that to be approved by the District PC | Output / Activity 3.2.3 Public awareness raising on contaminated sites and POPs stockpiles, aimed at a better implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active | Within 18 months after project implementation, about 80% of local communities close to POPs contaminated sites in 2 pilot provinces understanding about risks posed by POPs to human health and environment, risk reduction measures and emergency preparedness and response, and actively involving in development and implementation of contaminated site management plans At least 01 communication campaigns carried out at each of the communes and 02 trainings provided to key local authorities to facilitating for better implementation of all risk management measures, risk reduction and emergency responses, and health and safety protection, with active participation of the population POPs exposure reduction actions carried out with the involvement of the community after | To be combined with 4.2. | U |
| | up of the Lam Hoa site in | 50t of pure DDT destroyed plus 100 t of highly DDT contaminated soil treated on site.) Site surveys completed. Phase 2 Site Assessment Phase 3 Site Remediation Assessment, Phase 4; Site Remediation Management completed Disposal of 50 t of POPs pesticide (DDT) and safeguarding / remediation of around 100 t of contaminated material POPs pesticide (DDT) safely transported and destroyed in compliance with Stockholm and Basel Convention | contaminated with pesticides collected in December 2017 and packed up in Hung Cha Nan and Hang Hung Nhan's gardens; all transported to and processed at Thanh Cong facility (Hai Duong province), by end of April 2018 +20 to 30 tons will be collected Mid-long-term remediation design expected by end of April 2018 Design to be base for EPP that to be | HS |
| Liuteome 5.7 | Outcome 3.2 | rhase 5; Site Monitoring and Aftercare completed | | MS |

Table 11: Achievements at MTR for Outcome 4.1

| Outcome 4.1. Mercury baseline source and release inventory developed | | | |
|---|--|--|--------|
| Result | End-of-Project Target | Status at MTR | Rating |
| Output / Activity 4.1.1 Identification of main industrial process which may lead to mercury release | The preliminary inventory source will cover an estimation of mercury from unintentional releases (i.e. atmospheric emission of mercury from combustion of coal), use of mercury in chemical plants (chloralkali processes, production of pesticides), small gold mining | Company selected in March 2018 Completion expected in 4 Q 2018 – 1 Q 2019 | MU |
| Output / Activity 4.1.2 Questionnaire survey, process analysis, site visits for a number of possible mercury release sources | A questionnaire aimed at establishing and consolidating a preliminary inventory of mercury source and release will be distributed to the main institutional and industrial stakeholders, which will also help identifying training and awareness raising needs. | Two types of questionnaires (products and emissions) for a preliminary inventory of mercury source and release under development; Distribution expected in May 2018 4 sectors selected for the mercury inventory | MS |
| Output / Activity 4.1.3 Identification of main manufacturing products which may contain mercury. | Database containing amounts of products included in the Annex A of the Minamata convention. | 5 NCs recruited in January 2018 to work on the database containing amounts of products included in the Annex A of the Minamata convention Draft report on the database expected October 2018 | MS |
| Output / Activity 4.1.4 Road Map on sound mercury management and the reduction of mercury release | Roadmap/strategy and recommendation for the management and reduction of mercury emission and replacement of mercury containing products will be developed, including: assessment of mercury content in raw material and emission, assessment of amount of mercury in products, impact assessment of product reduction and phase out of mercury containing articles, waste management implication, and timeframe | TOR for Plan/roadmap/strategy developed Recruitment pending on approval of 2018 PP (expected June 2018) | MU |
| Outcome 4.1 | | | MU |

Table 12: Achievements at MTR for Outcome 4.

| Outcome 4.2 Increased knowledge and awareness of mercury source and releases | | | |
|--|------------------------------------|---|--------|
| Result End-of-Project Target Status at MTR | | | Rating |
| Output / Activity 4.2.1. | 02 information outreach workshops | TOR for outreach workshops developed | |
| Information outreach workshops | conducted at two locations to | Recruitment pending on approval of 2018 | |
| (2 nos) conducted to provide | discuss on mercury sources, risks | PP (expected June 2018) | MU |
| information on source and and practice mercury management | | | MIU |
| release of inventory. | in Vietnam and experience in | | |
| | mercury management internationally | | |
| Outcome 4.2 | | | MU |

The above as a simplified matrix for progress towards results. The full matrix according to GEF guidelines is provided in Annex 3.

The MTR found that implementation of a majority of the planned outputs are at the stage of recruitment of consultants, in few more advanced cases waiting for the consultants' deliverables in the form of technical reports, draft guidelines and workshops facilitation. Due to the absence of the consultants' deliverables, it was not possible for the evaluators to assess the quality of the deliverables. The rating in the last column in Tables 5-12 above is based on the premise that the project has to be completed within the officially approved implementation period, i.e. by the end of 2018. Hence the rating scores are given on the expectation whether the outputs and

outcomes will or will not achieve their respective end-of-project targets by the end of 2018. Hence, outputs that are in progress to achieve the end-of-targets by end of 2018 are rated S (Satisfactory) or MS (Moderately Satisfactory) while ratings MU (Moderately Unsatisfactory) and U (Unsatisfactory) are given to outputs and outcomes that will require a longer period for completion than the remaining time left until the end of the project approved implementation period.

Although the GEF guidelines for mid-term reviews require the evaluators to provide only one overall rating for each outcome and the overall objective, in Tables 5-12 above ratings are given to individual outputs and then aggregated from the output level for the outcome composed of the rated outputs. In such manner the aggregation of the ratings for component outputs justifies the aggregated outcome rating.

For Outcome 1.1, two outputs are rated (S) and the other three outputs as (MS) that yields the aggregated rating for the outcome (MS). The essence of the outcome is that the overall policy framework and specific regulatory measures on POPs/PTS are developed and implemented. It is not clear what the word "implemented" means but the formulation of end-of-project targets suggests that in the context of this project the word could be understood as submission for approval of relevant authorities. Obviously, the true implementation of the framework and regulations, i.e. their sanctioning and practical use could and in most cases will take some more time and will reach beyond the project time boundaries.

For Outcome 1.2, two outputs are rated (MS) and the other two (MU). The justification for the overall rating (MU) is that the two outputs rated (MU) are critical for the achievement of the outcome, i.e. skills and knowledge for formulation and implementation of policies consistent with sound chemicals management and international conventions. The evaluators reckon that in particular the last output on market-based policy and public-private partnerships for hazardous POPs waste reduction and management is at risk not to be achieved by the end of the project since these topics are by nature innovative and ground breaking that are to a great extent unprecedented in the country.

For Outcome 2.1 on reporting on POPs and PTS (mercury), the evaluators reckon that the needs assessment of laboratories capable of ambient and receptor POPs/PTS monitoring is at advanced stage and could be completed by the end of the project period. Moreover, the general section on chemicals in the environment for the State of Environment Report has already been piloted for the 2017 report ahead of the end-of-project target, hence the outcome is rated (MS).

It is clear from the Table 8 above that Outcome 2.2. is by one of the most lagging outcomes in terms of progress in the implementation. Based on the current status of implementation, the evaluators believe that none of the three outputs will be completed by the end of 2018. Although upon request of NIP UNDP took over implementation of output 2.2.3 on PRTR reporting, the little progress in implementation is persisting. Therefore, overall rating (U) is given to attract the attention of the national implementation partners to this outcome and urge them to devote more attention to accelerate the implementation. In particular, the output on international accreditation for laboratories will require much attention as even the laboratories for accreditation have not been selected yet and the accreditation process itself is a very cumbersome and time consuming.

Delays in implementation has also been noted under Outcome 3.1 on policies, regulations and technical guidelines for management of POPs contaminated sites. The only tangible result at MTR has been the issuance of Circular 30/2016 on guidelines for contaminated site assessment and site remediation assessment. However, the base for the Circular was the work done under the previous project on pesticide stockpiles.

The evaluators noted that for Output 3.1.2. no activities were planned in 2016 and 2017 AWPs and that for the first time this output appeared only in AWP for 2018. At MTR, TOR for the substance of the output, namely the development of risk management procedures and guidelines for contaminated sites was only under development. Given the fact that this output requires considerable time to complete and its results were expected to serve as important technical guidance for implementation of the entire Outcome 3.2, the delayed start of implementation of 3.1.2 indicates insufficiencies in work planning for results under the entire Component 3.

Due to the late start of 3.1.2. and complexity of the other output on inventories of POPs contaminated sites (3.1.3) implementation of both outputs is expected to protract deeply into the year 2019. Therefore, progress to results under Outcome 3.1 is rated Unsatisfactory (U).

By contrast, the Outcome 3.2 on provincial management plans for the demonstration provinces has shown some progress. This is in particular owing to progress on clean up on Lam Hoa site (output 3.2.4) that has practically achieved the end-of-project target already around the time of MTR. Also, finalization of the provincial Environmental Protection Plan (EPP) for Nghe An province (the first sub-component of output 3.2.1) has been on track. EPP has been submitted to the provincial PPC and approval is expected in May 2018. Replication of this experience in three other provinces will commence with consultation workshop scheduled for June 2018. Lack of progress on the other sub-component of output 3.2.1, namely development of EPP for management of contamination by industrial POPs in province Binh Duong is the reason that the overall rating for output 3.2.1 is only (MS).

There has been little progress on the outputs related to training (3.2.2) and public awareness (3.2.3). PMU and representatives of the technical departments of NPI informed the evaluators that implementation of the public awareness output will be combined with output 4.2.1. (public awareness on mercury). While the activities, i.e. information workshops for general public in selected provinces, are similar under 3.2.3 and 4.2.1, the nature of information to be communicated to the public is different and the evaluators thus have some doubts about the efficiency and effectiveness of the combined implementation of the two outputs. The lack of progress on the training and public awareness outputs is outweighing the relatively good progress on the other two outputs therefore the overall rating for the Outcome 3.2. is only Moderately Satisfactory (MS).

For Outcome 4.1, although implementation of two outputs on establishment of mercury baseline source and release inventory have started at the end of 2016, they did not progress at speed in 2017 and regained some momentum only at the beginning of 2018. Since the activities to achieve the first three outputs are relatively simple, the rating for all three is (MS). However, the output 4.1.4 on road map for sound mercury management and release reduction will progress only with the information collected at completion of the first three outputs later in 2018 and therefore is expected to be completed only in 2019. Since the output 4.1.4 is critical

for achievement of the end-of-project target for the entire Outcome 4.1, the overall rating given is (MU). The same rating is given also to Outcome 4.2. The reason for the rating is that the MTR achievement is only TOR for outreach workshops and further implementation is pending on approval of the 2018 Procurement Plan. The evaluators reckon that given the relative novelty of issues related with mercury and complexity of the fourth output under the Outcome 4.1. only Outcome 4.2 on public awareness can be realistically completed by the end of 2018.

The project objective is the continued reduction of environmental and health risks through POPs and harmful chemicals release reduction achieved by provision of an integrated institutional and regulatory framework covering management and reporting of POPs and harmful chemicals within a national sound chemicals management framework and targeted development of POPs contaminated sites management capacity. It follows from the detailed analysis of outcomes that by the end of 2018 the project objective is expected to achieve its end-of-project targets with major shortcomings. Therefore, the overall rating for progress to the achievement of the project objective at MTR is Moderately Unsatisfactory (MS).

4.2.2. Remaining barriers to achieving the project objective

Despite the reported slow progress of the project implementation, the MTR team considers that several of the thirteen barriers to sound POPs and harmful chemicals management in Vietnam namely those related to the regulatory frameworks, information systems as well as mercury reporting are being addressed by the project activities under the project Components 1, 2 and 4 and will be removed by the achievement of the respective outputs in the 2nd half of 2018.

Given the reported expected completion of outputs under the Component 3, it will take longer time to address the barriers related to management of POPs contaminated sites, namely lack of standard methodologies for selecting and evaluating POPs remediation technologies, absence of regulatory tools aimed at the proper harmonisation, integration and enforcement of the methodologies for contaminated sites management, deficit of mechanisms for addressing small contaminated sites at the community level, and lack inventory on POPs contaminated industrial sites (including dismissed facilities) around the country.

Regarding the gap in monitoring capability concerning specific matrices and POPs substances that was reported as barrier g) in the Project Document, the MTR team has reviewed available documentation and during the evaluation mission visited the Centre for Environmental Monitoring (CEM) in Hanoi. The long list of laboratories capable of POPs/PTS analysis compiled for the original Project Document and the visit of CEM provided evidence that there is considerable capacity at the national level for POPs/PTS monitoring in a variety of matrices. This is a result of continued support from multilateral as well as bilateral and private funding sources. For example, there is currently on-going regional project UNEP/GEF project 'Implementation of the POPs Monitoring Plan in the Asian Region under the Stockholm Convention' with full participation of CEM. The regional project organizes POPs interlaboratory assessments and provides technical assistance in terms of standardized sampling and analytical methodologies for POPs including new substances and sampling/analysis in difficult environmental matrices and receptors.

However, difficulties that the MTR team faced in collection of the information about the existing POPs monitoring capacities suggest that there is insufficient coordination in the area of POPs monitoring at the national level. Absence of the coordination constitutes a barrier preventing efficient and effective use of the existing capacities in POPs monitoring programmes.

Still on the same topic of the enhancement of the monitoring capacity, the MTR would like to bring attention to the discussion that was held on the issue whether to strengthen the capacity of central of local laboratories during the 2016 Inception Workshop. The Minutes of IW contain the following statement by the representative of CEM:

For this issue, the representative of the Center for Environmental Monitoring said that there are Centers for Environmental Monitoring under DONREs/Departments of Environmental Protection. Every year, these centers have reported updated information on the system. Therefore, in order to implement training activities on analysis, it should prioritize to develop lab network based on environmental monitoring network from central government/Ministry to local government/Department and prioritize to train for the provinces to strengthen local capacity for analysis under quality supervision and unified approach from central government. Thereby, the local monitoring data will get better quality, and ensure consistency from local to central.

The discussing at the Inception Workshop supports the opinion of the MTR team that the barrier in monitoring capability exists mainly at the level of provinces. This barrier is expected to be addressed by the current project under the Outcome 2.2, but activities have in fact only started and delivery of planned outputs will take at least the rest of the calendar year 2018, if not longer. The needs assessment on laboratory capacity, expected by December 2018, will provide a clearer picture and will serve as grounds for organization of general as well as technical trainings for provincial staff in 2019.

Through the discussion with DONRE in two provinces the MTR evaluators learned about a related issue to the above barrier, namely lack of national certification of existing laboratories at level of provinces. Even if a provincial laboratory does have capacity to analyse some POPs in simple matrices and receptors, provincial authorities can't use the local laboratories if they are not certified for such analyses.

There is an example of already achieved laboratory certification in Binh Duong province that is one of the first licensed provinces according to the Government regulation on the conditions of organization which implement environmental monitoring services¹⁴. Unfortunately, a laboratory with national certification is not available in Quang Binh province. Provision of assistance to laboratories in the three provinces selected for demonstration of management of POPs contaminated sites under the Outcome 3.2 to obtain national certification can dramatically increase effectiveness and efficiency of POPs monitoring in the demonstration provinces.

4.3. Project Implementation and Adaptive Management Arrangements

This section of the evaluation report provides assessment of the seven components of project implementation and adaptive management, namely management arrangements, work planning,

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¹⁴Decree No. 127/2014/ND-CP dated December 31st 2014

finance and co-finance, project-level monitoring and evaluation, management of risks, stakeholder engagement, as well as reporting and communications.

4.3.1. Management arrangements

The project is being executed according to the Harmonized Programme and Project Management Guidelines (HPPMG) that were jointly developed by the Government Aid Coordinating Agencies and three resident UN agencies (UNDP, UNFPA and UNICEF) for management and implementation of UN-supported projects/programmes under the National Implementation Modality (NIM) and have been effective since 2010. The purpose of HPPMG adoption was to ensure greater involvement and thus ownership of the development results by the Government.

As written above under Project timeline and milestones, although the Project Document was signed on 29 January 2016 as a formal sign of the start of the implementation, the first AWP marking the actual start of the implementation was approved by the Government only in November 2016. Analysis of the Project Implementation Reports suggests that since the inception of the project, PMU has been facing a number of issues that affected effectiveness of the project implementation.

Firstly, the 2017 APR produced by PMU states that the procurement cases (essentially recruitment of national consultants) conducted by PMU were hindered by a combined effect of two factors, namely i) the need to comply with the provisions of the National Law on Bidding¹⁵, and ii) the lack of response by qualified national consultants which forced the Government to repeat the recruitment advertisements few times before contracts could finally had been awarded. This was further confirmed by the interviews with relevant stakeholders during the evaluation mission. Consequently, while according to UNDP's experience such procurement cases would normally be completed within about 3 months, the procurement cases conducted in 2017 by the Government took about 6 months or more.

Furthermore, both PMU and UNDP confirmed in the interviews that all implementation-related decisions have to be approved at three levels of the leading implementing agency (MONRE), namely levels of the Department, the General Department and the Minister. Delays in the approvals of the project work and procurement plans indicate that the project might be lacking high-level decision-making support in the main NIP. The insufficient support could raise questions about the actual ownership of some of the project national implementing partners.

There were additional factors that could have had negative impact on the implementation of the project, namely a change of the Government that followed the parliamentary elections in May 2016, a change of the UNDP staff in charge of the project and a serious incident of industrial pollution that occurred in Vietnam (Ha Tinh province) around the time of the project inception. These factors were out of control of the project implementing team.

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¹⁵ Law No. 43/2013/QH13 dated November 26, 2013 of the National Assembly on bidding

In relation to the establishment of PMU the MTR team has made an observation. According to HPPMG:

The PMU is established within ten (10) working day from the date of approval of the PRODOC....¹⁶

On grounds of the available documents it can be established that while the Project Document was approved by the Government in December 2015 and signed by the implementing partners on 29 January 2016, the date of PMU establishment was three months later, namely 29 April 2016.

Although the implementation according to HPPMG is commendable in principle, the above findings and observation have highlighted the need for careful and timely use of this implementation modality. While HPPMG ensures flexibility in delegation of implementation between the Government and UN agencies as implementing partners, it appears from the above facts that by early triggering of the flexibility procedures on delegation of implementation (immediately after the detection and notification of delays) some of the delays in implementation could have been avoided.

The evaluators consider that while the management arrangements used for the project in theory support effective and efficient implementation of the project, in practice there were delays caused by some elements of the project management arrangement that require immediate attention and corrective action. Consequently, the rating for the management arrangement component is Moderately Unsatisfactory (MU).

4.3.2. Work planning

After the meeting of PSC at the beginning of the calendar year, PMU prepares Annual Work Plan (AWP) that specifies the project's planned activities for the current year and lists activities and targets for the year with quarterly implementation timeline as well as the total budget allocation for each activity in the year. AWP is then submitted for approval to the National Project Director that is designated by the National Implementing Partner and accountable to both the Government and UNDP. The approval process is relatively complicated as it reportedly includes approval at three levels of the Government (Department, VEA, MONRE) and approval at each level is granted only after a horizontal review by relevant units (planning, financial) at each level so completion of the process takes several weeks. After obtaining the approval from the Government side, PMU submits AWP to UNDP for approval.

The MTR team noted that AWP for the first year of the project implementation (2016) was approved only in November 2016. This delay resulted from the fact that in order to commence project implementation, the necessary project structures had to be established and manned, namely PMU and PSC. The year 2016 as the first year of implementation was to some extent extraordinary as parliamentary elections were held in Vietnam in May 2016. Hence the delayed recruitment and staffing of PMU (contracts signed 5 months after the official PMU establishment) could have been the result of changes in the Government after the elections.

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¹⁶HPPMG, Chapter II, Section 1.1.1.a

As PMU and PSC were already operational from 4Q 2016, improvements in AWP approvals were achieved in 2017 and 2018 but not enough to ensure smooth project implementation. AWP for 2017 was approved in March 2017 and at the time of the evaluation mission (mid-April 2018), AWP for 2018 still in the approval process within NIP. Delays in AWP approval have consequences on the project implementation down the line as AWP triggers preparation of a Procurement Plan (PP) for the same calendar year. The approval process for PP has the same complexity as it is subject to the same complicated process of clearances at different levels in MONRE. The 2017 PP was approved in June 2017 and approval of the 2018 PP is expected in June 2018. Since the project is heavy on procurement of consulting services (both national and international), the collected evidence clearly shows that practically half of each of the first two implementation years were lost in waiting for the PP approval. Analysis of the history of AWP and PP approvals in 2017 and 2018 thus clearly demonstrates that the sequential preparation of AWPs and PPs is one of the root causes for the delays in the implementation.

Despite some good elements in the work planning overall this component did not lead to effective and efficient implementation of the project. In particular, given the challenges the project will be facing in accelerating the implementation, the adaptability and flexibility of this component has to be improved. Therefore, the rating for the work planning component is Moderately Unsatisfactory (MU).

4.3.3. Monitoring and evaluation

The monitoring framework proposed in the Project Document is composed of several elements, however, since the inception of the project the implementation of the monitoring framework has been limited to preparation of quarterly progress reports and annual progress reports and annual work plans as well as occasional visits of field sites by MONRE technical specialists assigned to implementation of the part on management of sites contaminated by pesticides (Outcome 3.2). The progress in implementation has thus been tracked through PMU and PSC.

PMU prepares QPRs and APRs that contain information on planned activities and degree of actual achievement in the reporting period as well as financial information on planned budget and actual disbursements in a tabular format. Apart from that, APRs also contain a narrative assessment of the achievements as well as of challenges, lessons learnt and recommendations to address the challenges.

The evaluators noted that the both AWPs contain in the first column information on baseline, indicator, annual target and means of verification while further columns focus on planned activities. Similarly, the Annual Progress Reports do not contain proper assessment of the annual targets' achievement and focus on degree of disbursement of the annual planned budget. The key concern here is to promote a clearer focus on documenting and reporting achievement of results, not simply activities, input use and expenditure. Therefore, the current format of AWPs and APRs are not helpful in facilitating operational results-oriented monitoring. i.e. assessment of the degree to which the annual targets were or were not achieved.

Having reviewed the available APRs the MTR team also noted that PMU had provided suggestions and recommendations for adaptive management of the project both in the 2016 and 2017 APRs. However, there are no signs of follow-up on the recommendations, in particular

no evidence of consideration of the suggestions by PSC as the other element of the project monitoring system.

The evaluators judge that the delays in implementation are caused by a combined lack of monitoring of output-level targets as well as absence of follow-up on the recommendations provided in APRs by the other element of the project monitoring system, namely PSC.

PSC for the project meets regularly once at the beginning of a calendar year, although there is no provision on the frequency and time of meetings in the Decision on establishment of PSC (June 2016). The timing of the meeting at the beginning of year is chosen to enable review of the APR from the previous calendar year prepared by PMU and to present the AWP for the current year. The first meeting of PSC was not held immediately after PSC creation and consequently the 2016 APR made the following statement:

Project has the participation, coordination as well as management of multiple stakeholders (MONRE, MOIT, and UNDP), and towards numbers of stakeholders/beneficiaries (Ministry of Health, Ministry of Agriculture and Rural Development...), however some of the parties have not clearly understood the purposes, objectives and content of the project thus the project hasn't been got much their support

Firstly, the exact role of PSC in project implementation appears to be not fully clear to the relevant stakeholders.

According to the Article of the relevant decision on PSC establishment,

....PSC has been responsible to supervise and monitor the project implementation to ensure the objectives, progress, quality and use of resources of the project as specified in the approved Project Document.....

From the collected evidence about the delayed and slow start of the project the MTR team considers that the existing function of PSC has not been fully conducive to facilitate timely decisions on project implementation.

Even though the establishment of a Steering Committee is not mandatory in UNDP programmes and projects, in the case of national implementation it is highly recommended in order to support project monitoring and such has been the practice followed in projects implemented in recent past. Review and analysis of the current PSC procedures reveals that PSC for this project performs only a supervisory function based mainly on approvals of disbursements and procurement events. However, there is a need to supplement the supervision with a function of implementation support focusing more on the achievement of results.

The MTR team believe that implementation of the project would have benefited if the definitions of the PSC role and function were more detailed and included delineation of PSC procedures and specific functions. In particular, consideration of an additional PSC meeting in mid-year and decision making by e-mail circulation on ad-hoc important matters would be the desirable improvement. Since PSC is the standard mechanism widely used in development assistance projects, the improved definition of PSC could serve as a template for replication in other similar future projects wherever necessary.

Moreover, the MTR team consider a single PSC meeting per annum insufficient for ensuring full effectiveness of the project monitoring. The justification for this judgement is based on

experience with similar supervisory bodies in technical cooperation projects of comparable size and complexity.

For example, the Project Document for the UNDP/GEF project on dioxins¹⁷ that had also been implemented under the NIM modality, stipulates on meetings of PSC the following:

"....The PSC will meet every six-months, or more often on an ad-hoc basis, if deemed necessary."

It is not clear to the evaluators while this practice has not been continued in the current project. The limitation of PSC meetings to one meeting at the beginning of the year (January or February) does not give PSC opportunity to provide desirable support for the implementation by discussion and approval of corrective measures. The evaluators therefore suggest the experience form PSC meetings in the previous projects should be thoroughly reviewed in order to prepare a more detailed definition of PSC that should contain definition of its function as well as increased frequency of meetings. Second meeting of PSC should be planned for end of 2Q (including the current year). This arrangement will enable NIP to take proper corrective measures in mid-year and ensure that implementation of the project is accelerated.

The evaluation plan proposed in the Project Document includes the two mandatory elements required by the GEF M&E Policy, namely a Mid-Term Review and a Terminal Evaluation. MTR is being conducted at the mid-point in project implementation according to the plan in the Project Document.

Based on the above, the evaluators adjudge that the project level monitoring requires remedial actions particularly in the area of the monitoring of annual targets for individual outputs of the project in order to improve effectiveness and efficiency of the project implementation. Accordingly, the rating given for the project level monitoring component is Moderately Unsatisfactory (MU).

4.3.4. Identification and management of risks

A rather long list of risks was compiled at the design phase and made part of the project logframe. A revised list of risks and related assumptions were presented in the project logframe revision after the 2016 Inception Meeting. However, there is no risk rating in the revised list and the assumptions listed therein are in fact risk mitigation measures. The revised list of risks and related mitigation measures are in Table 13 below.

Table 13: Revised list of project risks and risk mitigation measures

| Result | Risk Description | Assumptions/Countermeasures |
|---|--|--|
| Outcome 1.1. Overall policy framework and specific regulatory measures covering environmentally sound management of POPs and PTS through life cycle management developed and implemented. | 1) Lack of coordination of the relevant institutions and ministries 2) Conflicting objectives of different ministries / stakeholders which may render difficult the negotiation for upgrading regulation on POPs. 3) Lack of commitment of relevant stakeholders 4) Timing and complexities of procedures for the examination, | Assumptions/Countermeasures 1) 2) and 3) Coordination and solution of conflicts among different stakeholders may be solved by involving them in the project steering committee and/or in specific project activities and establishing a well staffed PMU for project management. A "POPs regulation coordination office" will be established at MONRE which will interact with PMU and will coordinate with all governmental bodies involved in regulatory work 4) The selection of the proper procedure and type of regulatory instruments (i.e. decree instead of laws, or official guidance documents annexed to existing |

¹⁷Environmental Remediation of Dioxin Contaminated Hotspots in Vietnam, implemented in 2009-2014

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| Result | Risk Description | Assumptions/Countermeasures |
|---|--|---|
| | voting and adoption of new | laws) for POPs – related legislation will ensure that |
| 0.4.127 | technical regulations | regulation is adopted within project deadline |
| Outcome 1.2 Key institutions have knowledge | 1) Lack of coordination of the relevant institutions and | 1) 2) and 3) as above |
| and skills to formulate and | ministries | 4) To access the training session on site assessment and clean-up standards, candidate will have to pass |
| implement necessary | 2) Conflicting objectives of | an initial test which will serve also as baseline; and a |
| chemicals and environment | different ministries / stakeholders | final test, which will demonstrate the progress |
| policies, consistent with | which may render difficult the | achieved and hence effectiveness of the training. The |
| sound chemicals | coordination for a procedure on | trainees passing the final test will receive an official |
| management principles and international convention | risk assessment. | certificate issued by (identify) . The above will |
| requirements | 3) Lack of commitment of relevant stakeholders | ensure at the same time willingness to attend training course and quality/effectiveness of the training |
| | 4) Training effectiveness limited | 5) Market based policies will be developed since the |
| | or not properly assessed due to | very starting of the project, on sectors where the |
| | limited participation or limited | effectiveness on POPs reduction is higher and |
| | quality control. | sustainability is more likely (for instance, POPs |
| | 5) Complexities related to the | contaminated sites or sampling/analysis activities where a substantial amount of governmental funding |
| | establishment of a public/private | already exist) so that the risk of failure is minimal |
| | partnership, or no market for services in the POPs sector | , |
| Outcome 2.1. National | 1) Agreement among stakeholders | 1) The establishment of a sound PMU with high |
| institutions provide | on baseline and environmental | skilled professionals, together with assistance from |
| comprehensive and | quality targets not achievable | national and international experts, in cooperation |
| coordinated ambient | within the project timeframe. | with representatives from all the relevant |
| environment and receptor POPs /PTS monitoring that | 2) Scientific complexity of | governmental, non-governmental and private stakeholders will ensure that agreement on the matter |
| is consolidated into a | establishing baseline and environmental standards for | will be achieved within project deadline, and that |
| national database and | monitoring reference is too high | data validation of the existing information is carried |
| utilized for high quality | to be addressed within the project | out in the proper way |
| reporting to the | timeframe | 2) The work on ambient environment and receptor |
| GoV/National Assembly and the Convention | | POPs and mercury baseline and environmental |
| and the convention | | quality standard will build on international existing standards already set by authoritative agencies |
| | | (WHO, USEPA, ECHA), and adapted to Vietnam. |
| | | By recruiting experts and establishing a strict |
| | | cooperation with relevant stakeholders, it will be |
| | | possible to identify within project framework a scientific and sustainable set of environmental quality |
| | | standards for all POPs and for mercury |
| Outcome 2.2 National | 1) Unavailability of data, or | 1) Although it is expected that there will be |
| POPs/PTS laboratory | difficulties in data validation due | substantial data gaps on monitoring data, by starting |
| network for support of | to different sampling and | from areas where monitoring data are more reliable |
| ambient environment and | analytical methodologies and lack | and complete, and relying on existing guidance on |
| receptor monitoring certified/accredited | of information on monitoring condition | POPs, it will be possible to set methodologies and standards for the establishment of a database |
| oermied decreated | 2) Data owners unwilling to share | structure and a reporting system covering all POPs |
| | data and relevant source and | and environmental sectors. |
| | monitoring information. | 2) The drafting, communication, and enforcement of |
| | 3) Laboratories unwilling to | the PRTR circular, linked to permitting and licensing |
| | participate in accreditation | of industrial activities, will ensure willingness of stakeholder to communicate the relevant information. |
| | program, and/or unwilling to share data on their capability, | The majority of laboratories are governmental |
| | equipment, methodology, | institutions or private/public laboratories working |
| | technical capacity | within governmental projects; their interest in sharing |
| | | data will be ensured by directly involving them in |
| | | project activities. |
| | | 3) By providing assistance and training on accreditation and certification scheme to labs-their |
| | | interest in joining an accreditation scheme – |
| | | otherwise missing substantial business opportunities |
| 0 | | in the future – will be insured |
| Outcome 3.1 Key policies, regulations and technical | Scientific complexity of establishing risk management | Scientifically sound risk based methodologies and cleanupstandards have been developed and |
| guidelines for management | methodologies and cleanup | extensively tested by a number of authoritative |
| 5 didefines for management | monodologics and cicanup | onconstroly tested by a number of authoritative |

| Result | Risk Description | Assumptions/Countermeasures |
|--|---|---|
| of POPs contaminated sites are in place Outcome 3.2 Provincial | standard is too high to be addressed within the project timeframe 1) The main risks are likely | international institutions, and are continuously upgraded. Rather than developing new methodologies and standards, the work on risk assessment and cleanup criteria will build on international existing standards and methodology by establishing cooperation / contacts with the relevant international institution who developed these standards. (WHO, USEPA, ECHA, ISO, ASTM), and adapted to Vietnamese specific situation where necessary and feasible. By recruiting international and national experts with outstanding experience in the field, in strict cooperation with relevant stakeholders, it will be possible to identify within project framework a scientific and sustainable set of risk based standards and methodologies for all POPs and for mercury |
| Management Plan for the Demonstration Provinces | related to the uncertainties related to the exact number and size which may be discovered after upgrading the POPs contaminated sites in the 2 pilot provinces. 2) In addition, improper prioritisation may lead to decisions not ensuring the highest global environmental benefit achievable with the available resources. 3) awareness raising activities incomplete or not effective due to improper identification of targets | concept of "pilot" activities going toward full scale implementation. A sound POPs contaminated management plan will be established to optimize the allocation of governmental resources and ensure timely implementation of remediation activities. 2) The management plan will be also aimed at identifying the best options for maximizing the global environmental benefit of the remediation given the amount of resource available within a specific timeframe. 3) Awareness raising activities will be preceded by a sound awareness raising plans aimed at properly identifying target and the best communication media |
| Output 3.2.4 Cleanup of the Lam Hoa site in Quang Binh | 1) Intervention to the site is delayed, therefore the pesticide found will be further dispersed in the environment. 2) Logistic difficult to access the site hinder safe operations. 3) the site is a previous war zone where UXO (Unexploded Ordinances) have been found. 3) Limited information on the site made the budget estimate unreliable | 1) Activities can start immediately after approval of the inception report as the budget is already allocated. 2) The preliminary assessment report has been drafted by outstanding national and international expert and can be considered highly reliable. 3) Previous cooperation with NGOs in charge of UXO detection and inactivation can be extended |
| Outcome 4.1. Mercury baseline source and release inventory developed | 1) Difficulties related to the involvement of proper stakeholders on mercury sources 2) Limited participation in workshops Scarcity of information related to the presence of mercury in products. 3) Unwillingness of producer / importer to share information on mercury concentration in products. 4) Complexity to address and agree a release reduction strategy in case it will affect economic interests of private industries | 1) Vietnam signed the Minamata convention, therefore already demonstrated high commitment in addressing environmental and health problems related to mercury. The project will involve the governmental institutions in charge of Minamata convention which are familiar with the stakeholders involved in mercury reduction. 2) Similarly to the other training activities, to access the training session on mercury inventory and reduction strategy, the candidate will have to pass an initial test which will serve also as baseline; and a final test, which will demonstrate the progress achieved and hence effectiveness of the training. The trainees passing the final test will receive an official certificate issued by (identify). The above will ensure at the same time willingness to attend training course and quality/effectiveness of the training 3) This activity will be carried out in coordination with MOIT has the largest potential to gather information on commercial products and to involve industrial partners. |

| Result | Risk Description | Assumptions/Countermeasures |
|---|------------------|--|
| | | 4) The Minamata Convention establish a progressive timeframe which will ensure enough time to solve all the economy-related issues associated with mercury reduction. Therefore, a strategy on mercury reduction will build on the Minamata convention requirements and timeframe. |
| Outcome 4.2 Increased knowledge and awareness of mercury source and releases | ??? | The communication materials are developed before carrying out the information outreach workshops |

The MTR team considers the risk and assumptions identification sufficiently detailed and addressing a variety of project risk areas such as nature/size of project activities, technical/policy/institutional complexities, as well as stakeholder ownership or resistance. On the other hand, no risks were identified in relation to the extent and nature of co-financing arrangements. Given the fact that to secure certain ratio of co-financing is obligatory for all GEF-funded project, this fact comes to the evaluators as a surprise.

Furthermore, the MTR team did not find any evidence of risk reassessment hence the risk identification at project design and inception appears to be one time only exercise. In theory, there should be periodic re-assessment of project-related risks. While it could be argued that there is not much value in reassessment of risks related to technical/policy/institutional arrangement complexities and nature/size of the project activities, the MTR team consider lack of follow up assessment in the other project-related risk areas as a potential threat to the project success.

In particular, discussion the MTR team held in the provinces indicated that lack of funding for management and physical treatment of contaminated sites could be at risk if co-financing commitments are not fully met. Therefore, periodic reassessment of availability and extent of co-financing appears to be of paramount importance and therefore critical not only for compliance with the GEF co-financing condition. Availability of sufficient level of co-financing for activities under Outcome 3.2. is a critical condition to sustain the project activities beyond the time boundary of the project implementation period. The MTR team considers that the project implementing partners should develop a system for periodic collection and monitoring of the co-financing commitments and establish a strategy to address the co-financing issues. Early identification of real of even potential shortfalls in co-financing is a basis for timely mitigation through other mechanisms, such as increased contributions from other co-financing partners, or identification of new funding partners.

Based on the above, the MTR team rates the risk identification and management as Moderately Unsatisfactory (MU).

4.3.5. Finance and co-finance

The tables below provide a summary of resources allocation for the project and of level of disbursement of the GEF grant funds as well as the amount of co-finance up to MTR.

Table 14 below displays financial summary of the project implementation.

Table 14: Allocation and disbursement of GEF funds (as of 31 March 2018)

| Outcome | Budget | Disbursement |
|---------|--------|--------------|

| No. | Title | US\$ | US\$ | Rate % |
|-----|---|-----------|------------|--------|
| 1 | Policy framework for sound chemicals management, including POPs/PTS | 455,000 | 62,754.12 | 13.79 |
| 2 | Institutional capacity for POPs/PTS monitoring and reporting | 600,000 | 11,994.25 | 2.00 |
| 3 | Management of POPs contaminated sites | 1,000,000 | 145,495.63 | 14.55 |
| 4 | National mercury baseline inventory and release reduction strategy | 300,000 | 9,689.46 | 3.23 |
| 5 | Monitoring, learning, adaptive feedback and evaluation | 70,000 | 17,131.26 | 24.47 |
| 6 | Project Management Unit | 125,000 | 68,730.05 | 54.98 |
| _ | Project Total | 2,550,000 | 315,794.77 | 12.38 |

The financial data in Table 14 is another evidence of the lack of implementation of Components 2 and 4 as already visible in Tables 7, 8, 11, and 12 above that demonstrate lack of substantive achievements at MTR stage for the two components.

The very low disbursement rates for Components 2 and 4 (2.00 and 3.23 % respectively) should be of paramount concern for the National Implementing Partners and UNDP as the low disbursement clearly demonstrates the risk that the project could not fully achieve its objectives even if there is approved extension of the project.

In relation to financial reporting it has to be noted that since the project has been implemented in line with HPPMG by two National Implementation Partners (MONRE and MOIT), two separate PMUs have been established for each NIP. The financial management is performed by the main PMU attached to MONRE that prepare quarterly work plans (QWPs) for the entire project and submit to UNDP. Apart from description of planned activities, QWPs also stipulate responsible parties for implementation of each activity. Upon approval of the workplans, UNDP transfers funds to both PMUs. Some activities are directly implemented by UNDP based on agreement between the implementing partners in line with HPPMG.

The main PMU also prepares quarterly progress reports for the entire project that indicate level of disbursement for each activity. According to the established financial rules, PMU can request UNDP another transfer of funds on condition that 80% from the previous funds tranche has been disbursed.

There is only a very short paragraph on co-financing in the original Project Document that makes only a general statement about the commitment for in-cash and in-kind co-financing expressed by the relevant national authorities (MONRE and MOIT) and JICA as the donor for a parallel bilateral project.

Table 15 below shows the co-finance committed at the project design phase by the National Implementing Partners as well as the other source.

Table 15: Allocation of resources for the project by funding source

| Funding Source | Amount at Inception US\$ | Amount at MTR US\$ | Percentage of total funds |
|----------------------------------|--------------------------------|--------------------------|---------------------------|
| GEF | 2,550,000 | 315,795 | 12.38 |
| N . 16 | | 45,956 ¹⁸ | |
| National Government – MONRE | 7,900,000 | 189,427 ¹⁹ | 16.24 |
| MONIE | | 898,209 ²⁰ | 10.24 |
| National Government - MOIT | 150,000 | 174,050 | |
| Other - JICA | 3,000,000 | 1,604,846 | 53.49 |
| Total co-financing | 11,050,000 | 2,912,488 | 26.36 |
| Total resources | 13,600,000 | 3,228,283 | 23.74 |

In order to learn about the co-financing from JICA, the MTR team visited the office of the Japan International Cooperation Assistance (JICA) in Hanoi to get information on implementation of '*The Project for Strengthening Chemicals Management in Vietnam*'. The latter project has a budget of US\$3,000,000 and exactly this amount is listed as other co-financing for the POPs project.

The JICA project has been approved in November 2014 for financing under the Memorandum of Cooperation between the Ministry of Economy, Trade and Industry of Japan (METI) and MOIT of Vietnam. The substance of the project is to establish a chemicals management system for industrial chemicals used by Vietnamese industries.

The project is implemented in cooperation with VINACHEMIA and has envisaged cofinancing by the Vietnam Government for development of the National Chemical Database. The original completion date was March 2018 but problems VINACHEMIA had to secure cofinancing caused delays in implementation and subsequently resulted in one-year extension of the project until April 2019.

Analysis of the JICA Project Document shows that the JICA project addresses all industrial chemicals in Vietnam and therefore has a much wider scope than the PHCM project. The wider scope of the JICA project was confirmed by the JICA Senior Advisor. The latter also confirmed that the JICA project budget does not have any specific allocation of funds for POPs/PTS controlled by the Stockholm Convention.

It follows from the information in Table 15 above that while 12.38% of the total GEF grant have been disbursed at MTR, 26.36% of the co-financing pledged at the project inception has actually been disbursed by April 2018. These figures show that the current level of co-financing appears to be corresponding to the expectations at the project inception.

However, it should be noted that the evaluators did not find any evidence of systematic collection and monitoring of the co-finance data by PMU or any other entity within the project. At the time of the evaluation mission, no comprehensive reports on actual levels of co-financing

¹⁸ In-cash contribution of MONRE

¹⁹In-kind contribution of MONRE

²⁰In-kindcontribution of localgovernments of NgheAnn and BinhDuongprovinces

were available and the co-financing information was provided later by PMU upon request of the MTR team.

The MTR team consider the current financial controls for the project sufficient but recommend that the low level of disbursement and absence of co-financing data collection require immediate attention and effective remedial actions by the implementing partners. The low disbursement rates are reflection of problems in the management arrangements and work planning that were already discussed above. Although the absence of co-financing data collection does not have a direct negative impact on project implementation efficiency and effectiveness, insufficient collection of the co-financing data will pose a challenge for the terminal evaluation of the project. Therefore, the rating for finance and co-finance component is Moderately Unsatisfactory (MU).

4.3.6. Stakeholder engagement

According to the Project Document, during the design phase of the project a number of stakeholders were involved through baseline surveys and consultation workshops/meetings. This stands valid namely for the key line ministries and associated agencies (MONRE/VEA and MOIT/VINACHEMIA) as well as other ministries. Through the key ministries, involvement of provincial authorities (DONREs) in the project design was also achieved.

Ministry of Agriculture and Rural Development (MARD) has some interest in the project that is based on good cooperation that had been established between MONRE and MARD during the previous project *Building capacity to eliminate POP pesticide stockpiles in Vietnam* that was implemented in the period 2010-2014. However, as the focus of the current project is on pesticide stockpiles and industrial pollution, the role of MARD has not been as prominent as in the previous project and MARD is therefore considered as a tangential rather than a key stakeholder.

The MARD representatives interviewed during the evaluation mission expressed MARD's general support for the project but also brought attention to the fact that the project does address only one of the three MARD areas of interest, namely improvement of the regulatory framework for environmental protection and chemical management policy, including pesticide management. The other two areas of MARD interest, namely scientific evidence on health and environmental impacts of pesticides and access to official information on pesticides provided by companies (pesticide importers and traders) are not addressed under the project. MARD suggested that should a new project dealing with POPs pesticides is considered, it should address in a more balanced way interest of all stakeholders.

As MARD also has membership on PSC of the project, MARD representatives said that the main benefit of PSC is its project supervisory function as it does not provide enough forum for all stakeholders to express their substantive interests in the subject area addressed by the project.

Ministry of Health (MOH) is another stakeholder with strong interest in the project as it is responsible for management of POPs and mercury within the health care system. In the design phase of the project, MOH was involved mainly through inventories of POPs and mercury used for public health. Apart from that, MOH did not have a role in project formulation and they received the Project Document after approval.

MOH has prepared a specific plan and list of activities for the health sector and for implementation maintains close relation with PMU. No formal internal approval process in MOH is required. The main benefit for MOH from the project will be improvement of the regulatory framework and provision of guidelines for risk assessment and management of pesticides in the health sector. MOH will also benefit from increased capacities for national capacities for POPs monitoring. Last but not least, MOH will also have a role in implementation of Component 4 as the phase-out of mercury in the health care sector is on-going and there has been commitment to stop using mercury in amalgam by 2020. Also, there is a plan for phase-out of mercury used in medical equipment.

The MTR team also visited and interviewed representatives of provincial authorities (Environmental Protection Agency/Department of Natural Resources and Environment – DONRE) in Nghe An and Quang Binh provinces.

DONRE of the Nghe An province has been a stakeholder with strong interest not only in the current project but also in the previous pesticide stockpile project. The continued support by the two projects resulted in establishment of 925 contaminated sites out of which 268 were selected for detailed assessment in line with the Decision 1946. They have a plan for treatment of 55 sites and at 17 sites they have already completed the treatment and returned the sites to the respective local authorities.

The legal base for the activities is Resolution 8 of the Provincial Party Committee (PPC) on Strengthening of the Environmental Protection in Nghe An. Under the previous project, the Nghe An DONRE has developed Environmental Management Plan (EMP) for 2018-2020 with vision to 2030. The Plan has been finalised thanks to the support of the current project and has been submitted to the PPC and approval is expected in May 2018.

While the site surveys and assessments are activities directly supported and conducted under the project, the treatment of sites is a complementary spin-off activity conducted by DONRE. They use three kinds of treatment technology, namely i) thermal destruction by incineration, ii) destruction by oxidation, and iii) on-site landfill isolation by use of high density polyethelene (HDPE). The thermal destruction can be performed by two companies certified for the process, namely Holcim and Thanh Cong cement works. Since the two certified companies are quite distant from the province, DONRE would like to identify a company in the province or the region to get certification for the pesticide destruction processes in order to increase cost effectiveness of the entire site treatment process.

According to DONRE, the implementation of EMP will command resources at the total level of about 250 billion VND. The plan will mobilize 5-20 billion VND per year from the central budget of the National Government and further 15 billion/year will be provided from the budget of the provincial government. For prioritization of the sites for treatment, DONRE uses criteria contained in Circular 30 by MONRE such as density of population and area of impact.

According to the project logframe revised at inception in April 2016, EMP from Nghe An is expected to be replicated in three provinces, namely Ha Tinh, Quang Binh, and Quang Tri.

Under the support from the previous and the current projects, DONRE of the Quang Binh province has conducted initial surveys of 80 sites and follow-up detailed surveys of 12 sites.

They have completed treatment of 6 sites and at further three sites the treatment works are currently on-going. The completed sites had been treated under the National Target Plan (NTP) were 100% of resources supplied by the national government. Since NTP had a limited duration and has finished in 2015, site treatment from 2015 onwards falls under Decisions 38 and 58 that envisage 50% cost-sharing from the provincial budgets. DONRE in Quang Binh is capable of in-kind contribution but in-cash contribution is needed from the central budget of MONRE. Recently DONRE have submitted a request for support to MONRE for further sites treatment but have not received the answer yet.

During the discussion DONRE expressed concerns about the cost effectiveness of the site assessment process. Although there is reportedly a laboratory in the province capable to conduct analysis of pesticide samples for the site assessment, it does not have national certification for such analysis. In order to obtain officially recognized and therefore credible results, DONRE has to send samples to a certified laboratory in Hanoi for analysis.

Although provincial stakeholders had been involved to some extent during the project formulation, the discussion with DONRE representatives in the two provinces revealed challenges DONREs currently face in assessment, monitoring and treatment of contaminated sites. This has proved that the barriers to effective POPs/PTS monitoring and site treatment at the provincial level were not fully recognized and taken into account for the project formulation stage. Provincial stakeholders such as DONREs could have been assigned a more prominent role in implementation of some project outputs, such as output 2.2.2 on training on POPs/PTS monitoring and reporting, and output 3.2.3 on public awareness raising about contaminated sites and POPs stockpiles. The more active role of the provinces in implementation of the project sub-components would give the project an additional dimension by partially compensating the traditional excess of focus on central stakeholders.

As described above, neither the previous nor the current project have envisaged the provision funds for treatment of contaminated sites. However, at the end of the previous project, a new site at Lam Hoa heavily contaminated by pesticides was discovered. Because of the urgency of the problem decisions were taken upon proposals made at the 2016 Inception Workshop to include direct support for treatment of the Lam Hoa site in the revised project logframe as the separate Output 3.2.4.

The MTR team visited Lam Hoa site and discussed with the representative of the local People's Committee. About 10 pesticide hot spots were discovered 2-3 years ago in what formerly was a war area where army pesticide transports had been abandoned after heavy bombardment of the area. A majority of the hotspots were discovered under the previous project, but 1-2 new ones emerged as a result of follow-up surveys under the current project.

The Lam Hoa site remediation management (phase 4) started in December 2017 when 48.5 tons of pesticides and pesticide-contaminated soil were removed by excavation and sent to the Thanh Cong cement factory for destruction by incineration. Phase 4 activities were still in progress at the time of MTR and further 20-30 tons of pesticides and contaminated soil is expected to be excavated and sent for incineration by the end of April 2018. The previous project yielded

technical guidelines for sustainable management of contaminated sites that became a basis for a new regulatory framework issued by the Government²¹.

As another part of the site remediation, an international consultant will provide design for mid-to-long-term remediation by on-site biological and/or chemical treatment. The on-site design will serve as a base for elaboration of the EPP that will be approved by the District PC to serve as the legal base for the site treatment. The MTR Team Leader met with the international consultant upon his arrival to Hanoi and discussed salient matters regarding the phase 4 work.

Given the complexity of the project components and multiplicity of the project stakeholders, the evaluators rate the stakeholder engagement in the project formulation and implementation Satisfactory (S).

4.3.7. Reporting and communication

As described under the sections on Monitoring & Evaluation, the main PMU (MONRE) prepares Quarterly Progress Reports for operational purposes and at the end of each calendar year a summary APR. The latter is then submitted to PSC for approval that triggers preparation of the AWP as described on the section Work planning.

Reporting during project implementation helps the project implementing partners to identify potential issues that may endanger the project's capacity to achieve its development objectives. Reporting also helps to make informed decisions, provides valuable information for project evaluation, and provides lessons for future projects. Effective and timely communication between the project implementing partners is key element in that respect.

After the PSC meeting at the beginning of 2017, UNDP CO notified the lack of progress in the project and very low disbursement rates in 2016. On 10 February 2017, the UNDP Country Director sent a letter to the Minister of Environment and Natural Resources urging the Government to accelerate approval of the 2017 AWP. Although the latter was approved on 29 March 2017, this brought only marginal increase in implementation during the first three quarters of 2017. Only on 17 October 2017, the implementing partners held a meeting to discuss the lack of project implementation and, in November 2017, the National Project Director from VEA responded to UNDP by requesting the latter to take over for direct implementation the activities on strengthening capacity of national laboratories, procurement of equipment for PMU and other similar activities from the draft AWP for 2018.

The above communication exchange demonstrates that there was a gap in communication between project implementing partners for about 6 months. It is beyond the mandate of the MTR to establish the exact reasons for the communication gap. The MTR team believes that more timely communication would have had an accelerating effect on the project implementation had the communication taken place much earlier in in the year. Nevertheless, the evaluators believe the communication episode was of extraordinary nature and have confidence that there are no systemic shortcomings in the communication between the

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²¹Circular No. 30/2016/TT-BTNMT dated October 12, 2016 on management, improvement and remediation of residue-contaminated sites

implementing partners. Therefore, the rating for the reporting and communication component is Moderately Satisfactory (MS).

Overall rating for the project implementation and adaptive management is based on aggregation of the above ratings for individual components above. Five out of the seven components are rated Moderately Unsatisfactory (MU) therefore the overall rating for project implementation and adaptive management is Moderately Unsatisfactory (MU).

4.4. Sustainability

The sustainability is defined as continuation of benefits from an intervention, after the development assistance has been completed. The important aspect here is the sustainability of results, not necessarily the sustainability of activities that produced the results. Assessment of sustainability requires evaluation of risks that may affect the continuation of the project outcomes.

The commitment of the Vietnam Government to sustain results of the current project is judged by examining the existence of relevant legislative framework, enforcement of the legal provisions and prospect of financial resources' availability for future remediation and treatment of the sites contaminated with POPs.

The following aspects were assessed in this mid-term review.

4.4.1. Financial risks to sustainability

Financial aspect constitutes in general a major risk factor in technical cooperation/assistance projects to developing countries. Commitment of resources to sustain the TC/TA projects' benefits always reflects the commitment of key stakeholders in the particular areas of intervention.

Regarding the project on POPs management, the results in terms of improved overall policy frameworks and specific new regulatory measures to be produced by the project are expected to last for the foreseeable future and there is no reason to it is highly likely that the Government will support eventual further amendments from the state budget.

In Vietnam, the financial commitments of the Government to support treatment of environmental pollution has been reflected in Decision 58/2008/QD-TTg and Decision 1206/QD-TTg. Decision 58 stipulates the commitment of the Government to provide financial support for projects on treatment and restoration of soil environment, treatment of pollution caused by residual chemical toxins used during the war times and control of dumping-site pollution. Decision 1206/QD, that allocated 5,863 billion VND for implementing the National Target Program (NTP) on pollution remediation and environmental improvement.

The implementation period of Decision 58 was 2008-2012 while for Decision 1206 the implementation period was 2012-2015. While there is no follow-up Decision on the NTP, Decision No. 38/2011/QD-TTgwas issued to amend a number of articles of Decision 58 on the state budget's targeted support funds for some seriously polluting public-utility establishments to implement projects to thoroughly remedy pollution.

Projects are considered for support under Decisions 58 and 38 when fully meeting two conditions: i) having been approved by competent state agencies under law and incorporated in annual state budget plans; and ii) having no funds or insufficient funds for implementation.

Land rehabilitation and treatment is one of the conditions to be considered for funding under Decision 38/2011. On the funds allocation the Decision stipulates the following:

The State shall allocate a sum of money for targeted support to thoroughly handle establishments causing serious environmental pollution under the Prime Minister's decisions. The management and use of funds for the achievement of these objectives shall be in accordance with the provisions of the law on state budget.

Unlike the NTP Decision 1206, there has been no indication of the amounts that can be provided by the state budget in the Decisions 58 and 38. Nevertheless, the MTR consider the current Decisions 58 and 38 as an expression of clear intention and strong commitment of the central Government to support management of sites contaminated by POPs/PTS through land rehabilitation and treatment in the foreseeable future.

4.4.2. Socio-economic risks to sustainability

The representatives of affected population interviewed during the visit of the two provinces indicated that local communities as well as provincial branches of the government have developed strong ownership of the results of the previous project on pesticide stockpiles so there is no reason to expect that they will take results from the current project differently. The perspective of the strong local ownership is based on the fact that socio-economic consequences of the project will in general be positive as the outcomes will ensure improvements in quality of life of population at large due to reduced exposure to POPs/PTS and thus prevent outmigration from the contaminated areas. More specifically, Outcomes 3.1 and 3.2 will have particularly positive socio-economic impact on local communities living around the pesticidecontaminated sites. In addition to the already mentioned improvements in the quality of life the communities will also benefit in terms of improved quality of drinking water and increased food security which will transfer into positive economic benefits in terms of reduced number of work day lost due to illness. As the site remediation work under Outcome 3.2 aims at returning the land in the contaminated areas back to agricultural use, there will be other obvious economic impacts in terms of access to productive land and improved financial situation of the affected households. On the contrary, a serious risk would occur if the project outcomes were not sustained beyond the project time boundary.

4.4.3. Institutional framework and governance risks to sustainability

The institutional frameworks to be created and/or improved under Outcomes 1.2 and 2.2 are likely to last for the foreseeable future. However, attention has to be brought again to the lack of implementation of the Component 2 and namely the certification process for provincial laboratories since the process takes time to fulfil all requirements of the certification programme.

Other risk related to the institutional framework is the on-going restructuring in MONRE that despite the overall commitment to sustain the results of the project could seriously slow down the progress towards the outcomes' achievement.

Another factor that has to be considered is the capability for enforcement of the new and improved legislative provisions. It is beyond the scope of this MTR to explore this factor in more details.

The evaluators did not identify any risk to the sustainability of the Component 4 outcomes, in particular of the road map for the management and reduction of mercury sources. The recent ratification of the Minamata Convention by Vietnam proves there is strong commitment of the Government for compliance with the provisions of the Convention. However, there is a risk that the outcome will not be achieved in time if implementation of this component is not extensively accelerated and if there is no approved extension of the project.

4.4.4. Environmental risks to sustainability

While the MTR team did not identify any serious environmental risks to sustainability of the project outcomes, there could be some risks on the progress to achievement of these outcomes. As written in this report, the project suffered from delayed start of implementation. Recently taken measures to accelerate the implementation will require full commitment of the relevant officials from the two NIPs, namely MONRE and MOIT, both at operational as well as managerial level. In case of a severe environmental incident before the end of the project implementation period, attention of key officials from MONRE could be diverted to tackle the consequences of the incident and prevent them from devotion of sufficient time to implementation of the project.

The following table summarizes the risks by the eight substantial outcomes of the project. Since this is the mid-term review, the rating of the risks includes the rating of probability whether the outcomes are on track to be achieved by the project's closure as well as rating of the probability that the achieved outcomes will continue into the foreseeable future.

Table 16: Overview of risks related to the project sustainability

| Outcome Number and Description | Associated Risk Type | Risk Rating |
|--|--------------------------|----------------|
| 1.1. Overall policy framework and specific regulatory measures covering environmentally sound | Institutional/Governance | Low |
| management of POPs and PTS through life cycle management developed and implemented | Environmental | |
| 1.2. Key institutions have knowledge and skills to formulate and implement necessary chemicals and | Institutional/Governance | Low |
| environment policies, consistent with sound chemicals management principles and international | Environmental | |
| convention requirements | | |
| 2.1. National institutions provide comprehensive and coordinated ambient environment and receptor | Institutional/Governance | Low |
| POPs /PTS monitoring that is consolidated into a national database and utilized for high quality | | |
| reporting to the GoV/National Assembly and the Convention. | | |
| 2.2. National POPs/PTS laboratory network for support of ambient environment and receptor | Institutional/Governance | Medium |
| monitoring certified/accredited | Financial | |
| 3.1. Key policies, regulations and technical guidelines for management of POPs contaminated sites | Institutional/Governance | Low |
| are in place | | |
| 3.2. Provincial Management Plan for the Demonstration Provinces | Institutional/Governance | Medium |
| | Financial | |
| 4.1. Mercury baseline source and release inventory developed | Institutional/Governance | Low |
| 4.2. Increased knowledge and awareness of mercury source and releases | Institutional/Governance | Low |

It follows from the above analysis of risks that the most fear-provoking are the risks associated with the failure to sustain the institutional and governance improvements after the project. The good news is that the national implementing partner organizations are well placed to control the institutional and governance risk since they are in fact to some extent also subject of the project interventions. Moreover, measures to mitigate the institutional and governance risks are

low cost in nature as their sustain to the project results does not require formation of new structures in addition to the existing ones.

Based on the above, the MTR team considers that there is only minor risk to sustainability as there is high probability that key outcomes will be achieved by the project closure and will continue into a foreseeable future. Therefore, the MTR team **rates the project sustainability Likely (L).**

5. CONCLUSIONS AND RECOMMENDATIONS

Based on the previous section of empirical facts collection, this section synthesizes and interprets the findings into conclusions that make judgments supported by one or more specific findings. Recommendations are then specific actions the evaluation team proposes to be taken by various project stakeholders that are based on the findings and conclusions.

In order to better link the conclusion/recommendation pairs to the evaluative evidence, a concise finding statement is presented first and then followed by the relevant conclusion and recommendation.

Since a majority of the recommendations are cutting across the entire project, they are not related to specific outcomes/outputs unless otherwise stated. Instead, the recommendations are classified into two groups, namely critical and normal recommendations. Recommendations No. 1- 8 are rated as critical recommendations since they address critical success factors i.e. characteristics and conditions that have a significant impact on the success of the project when properly sustained and managed. The critical recommendations should be therefore prioritized for fast track implementation.

Concise Finding 1: After slow start of the project, the implementation has recently been accelerated. However, a number of activities and outputs are expected to be carried out for completion beyond the planned completion date of the project (31 December 2018).

Conclusion 1: The planned completion date of the project is not realistic. In order to ensure full achievement of all planned end-of-project targets, the project implementation period has to be extended.

Recommendation 1: UNDP should submit request to GEF for project extension by 9 - 12 months and together with the National Implementing Partners to consider financial implications of covering from the project budget the running costs of PMU for the duration of the extension

Concise Finding 2: Due to inefficiencies in the project work planning and adaptive management Components 2 and 4 have started only recently and are not likely to be completed by the approved date of the project completion.

Conclusion 2: Due to the nature and complexity of Components 2 and 4, further delays in implementation of the two components could put at risk their completion even if project extension (Recommendation 1) is granted.

Recommendation 2: UNDP and the National Implementing Partners should pay special attention to accelerate the implementation of Components 2 and 4 in order to ensure completion of the components by the end of the extended project period

Concise Finding 3: a) Implementation of national procurement suffered from delays caused by a variety of reasons, in particular the need to comply with the provisions of the National Law on Bidding. Decisions on reassignment of implementation responsibilities on procurement between the implementing partners according to the HPPMG were taken with delays. b) Several

procurement events (particularly recruitment of national consultants) conducted by PMU were hindered by a combined effect of two factors, namely i) the need to comply with the provisions of the National Law on Bidding, and ii) the lack of response to announced tenders by qualified national consultants.

Conclusion 3: Flexibility for implementation by the implementing partners built in HPPMG has not been used effectively and to its full potential that has proved to have negatively affected the project implementation.

Recommendation 3a: UNDP and the National Implementing Partners should improve the adaptive project management mechanism for project implementation using the flexibility provisions in HPPMG such as timely delegation of national procurement to UNDP

Recommendation 3b: PMU should consider establishment of a roster of qualified national consultants in the technical areas related to POPs/PTS and proactively notify the consultants on the roster about published tenders in for procurement of advisory services in relevant areas of expertise

Concise Finding 4: Review and analysis of the current procedures of the Project Steering Committee suggests that PSC performs a supervisory function based mainly on approvals of disbursements for the previous year. However, PSC role and function is not defined in HPPMG and the definition in the relevant Decision on Establishment of PSC is not appropriate for the project of this size and complexity. A single PSC meeting per annum appears to be insufficient for ensuring full effectiveness of the project monitoring.

Conclusion 4: There is a need to strengthen PSC implementation support function focussing more on the achievement of results. The implementation of the project would benefit from a more detailed definition of the PSC role and function including definition of PSC procedures and specific functions. In particular, consideration of an additional PSC meeting in mid-year and decision making by e-mail circulation on ad-hoc important matters would be the desired improvement. Since PSC is the standard mechanism widely used in development assistance projects, the improved definition of PSC could serve as a template for replication in other similar future projects wherever necessary.

Recommendation 4: UNDP and the National Implementing Partners should consider revision of the PSC Terms of Reference to better define its role and functions for the project. The revised TOR could include e.g. stipulation of quorum for PSC decisions, possibility of one additional meeting per year as well as alternative for decision making on urgent implementation issues by e-mail communication of the PSC members.

Concise Finding 5: All implementation-related decisions have to be approved at three levels of the lead implementing agency (MONRE), namely the Department(s), the Agency (VEA) and the Minister (MONRE). Primarily this stands for the approval of the annual work plan at the beginning of the calendar year but the approval process for procurement plans is subject to the same complicated process of clearances at different levels in MONRE.

Conclusion 5: The approval mechanism at MONRE is too complicated and has caused delays in the project implementation. Delays in the approvals of the project work and procurement plans indicate that the project might be lacking high-level decision-making support in the lead implementing agency. The insufficient support could raise questions about the actual national ownership of the project.

Recommendation 5: The lead National Implementing Agency (MONRE) should streamline and simplify the approval mechanism of project-related decisions in order to avoid delays in project implementation.

Concise Finding 6: Annual Work Plans and Annual Procurement Plans are being prepared in a sequential mode, i.e. APP can be prepared only upon approval of AWP. In the two recent years this caused delays in procurement of consulting services for the project.

Conclusion 6: The sequential mode of preparation of AWPs and APPs in combination with the complex approval mechanism has caused delays in implementation of the project.

Recommendation 6: PMU should prepare AWPs and APPs in parallel so that both plans can be submitted the PSC meeting at the beginning of the calendar year.

Concise Finding 7: The annual targets in the annual work plans are not always set at operational level and in some cases the end-of-project targets are used instead. In particular, the AWPs do not contain information about status of progress to the end of project targets.

Conclusion 7: Due to insufficient information about status of progress to end-of-project targets in the project annual work plans, operational monitoring of the project progress does not achieve the desired effectiveness.

Recommendation 7: The PMU should ensure that AWPs contain a monitoring component in terms of status of progress to the end of project targets in order to improve operational monitoring of the project progress.

Concise Finding 8: Lack of co-financing was not identified as risk at the project design/inception phase and information on co-financing is fragmented and not readily available.

Conclusion 8: Insufficiency of operational monitoring of actual co-financing levels for the project could pose a challenge for terminal evaluation at the project completion.

Recommendation 8: PMU should actively manage the risk of insufficient co-financing by periodical updates of information on actually provided co-financing for the project according to the Project Document by MONRE/DONRE, MOIT and bilateral funding.

Concise Finding 9: Outputs under the Component 2 of the project logframe are not ordered properly to separate POPs/PTS reporting (Outcome 2.1) from POPs/PTS monitoring (Outcome 2.2).

Conclusion 9: Due to misplacement of some outputs under the Outcomes 2.1 and 2.2 the part of logframe for the project Component 2 lacks internal consistency.

Recommendation 9: The project implementing partners should consider reorganization of outputs under the project Component 2 to achieve better internal consistency of the project logframe as follows:

Output 2.1.2 related to the laboratory monitoring capacity is moved under Outcome 2.2. Output 2.2.3 related to POPs/PTS reporting is moved under Outcome 2.1.

Concise Finding 10: As a result of the slow initial implementation of the project, the time lines for some targets listed in the project logframe are outdated. Furthermore, few targets are unclearly formulated.

Conclusion 10: Outdated timelines of some end-of project targets and in the logframe will cause problems at the stage of the terminal evaluation.

Recommendation 10: UNDP together with the National Implementing Partners should revise and update the outdated time lines and/or reformulate targets for clarity if necessary.

Concise Finding 11: The original Project Document provides overview of national capacity for POPs/PTS monitoring. Since the project inception, the existing monitoring capacities have been further strengthened due to the continued massive support from a number of sources including bilateral and private funds. However, updated information on the actual national POPs/PTS monitoring capacities is fragmented and not readily available.

Conclusion 11: The lack of updated information on existing capacities for POPs/PTS monitoring has been one of the factors delaying implementation of the relevant component of the project (Outcome 2.2).

Recommendation 11: MONRE should improve coordination of the national POPs/PTS monitoring capacities in order to achieve more efficient and effective use of previous development assistance results in the field of POPs/PTs monitoring.

Concise Finding 12a: Although provincial stakeholders had been involved to some extent during the project formulation, barriers to effective POPs/PTS monitoring and site treatment at the provincial level were not fully recognized and taken into account for the project formulation stage.

Concise Finding 12b: The lack of nationally certified laboratories at the level of provinces demonstrates that the barrier in monitoring capability for POPs/PTS monitoring exists mainly at the level of provinces. Even if a provincial laboratory does have capacity to analyse some POPs in simple matrices and/or receptors, provincial authorities can't use the results if the laboratories are not certified for POPs/PTS analyses.

Conclusion 12: A more active role of the provinces in implementation of some project subcomponents would give the project an additional dimension by partially compensating the traditional excess of focus on central stakeholders. Absence of nationally certified laboratories in the provinces is an obstacle to cost-effective assessment of contaminated sites.

Recommendation 12a: The PMU should give provincial stakeholders such as DONREs a more active role in implementation of some project outputs, such as output 2.2.2 on

training on POPs/PTS monitoring and reporting, and output 3.2.3 on public awareness raising about contaminated sites and POPs stockpiles.

Recommendation 12b: Specifically, DONREs in the five provinces selected for work on POPs/PTS contaminated sites should identify provincial laboratories and in cooperation with MONRE support them to obtain national certification for POPs/PTS analyses.

Concise Finding 13: Information on impact of activities undertaken in the provinces such as number of people benefiting from the project activities and gender disaggregated information is not being systematically collected.

Conclusion 13: The need for collecting information on number of affected beneficiaries as well as gender disaggregated data on project beneficiaries and on project socio-economic effects (e.g. on marginalized groups of population) is not well understood by the provincial governments. The insufficient data collection related to ultimate beneficiaries of the project will not facilitate project impact and gender sensitive analysis at the stage of terminal evaluation.

Recommendation 13: PMU should ensure that trainings for representatives of the provincial governments include components explaining need for data collection on number of beneficiaries as well as gender-sensitive data as well as information on socioeconomic marginalized groups-related data.

Observation: Although the debriefing session at the end of the evaluation mission was scheduled in advance, senior managers from the two National Implementing Partners (MONRE and MOIT) did not attend the debriefing. A vital opportunity to sensitize the senior managers to proposals how to bring the project back on implementation track has been wasted.

Conclusion 14: Lack of senior management commitment is routinely listed as one of the major risk factors for technical cooperation projects. As senior managers of the two national implementing agencies are key stakeholders in the implementation of the project, their active engagement in mid-term and terminal evaluation is vital to the success of the project.

Recommendation 14: Senior management of the National Implementing Partners should provide support to the project by providing necessary resources including their active engagement with the project implementing teams on important events such as project mid-term and terminal evaluations.

5.1. Actions to follow up or reinforce initial benefits from the project

Interviews of national and provincial stakeholders and study of relevant documents revealed the following can be highlighted as best practices in the project and should be followed in implementation of this and future projects.

• Revision of the project baseline at the inception meeting

Since considerable time passed between the date of the GEF CEO approval of the project and the project inception workshop, it was reasonable decision to update the project baseline and take corrective actions in terms of adjustments in relevant outputs and outcomes in the project logframe.

• Inclusion of treatment of the contaminated site at Lam Hoa

Under the previous project "Building capacity to eliminate POPs pesticides stockpiles in Vietnam" a new site contaminated with DDT pesticide was found in 2015. This site is located in the Lam Hoa commune, Tuyen Hoa district of the Quang Binh province. Since the site contains at least 8 hot spots with remains of DDT of total quantity of pure DDT estimated around 40 tons. Because of the exposure to rain and rainwater run-off the soil at and surrounding of the eight hot spots was at risk to local communities.

Firstly, the decision to include the treatment works for the Lam Hoa site is considered a good practice since it demonstrates real commitment of the authorities to apply the national capacities for the benefits of communities living near contaminated sites, particularly those living in the neighbourhood of the most contaminated sites.

Secondly, the discovery of the Lam Hoa site was done by surveys conducted towards the end of the previous project on POPs pesticide stockpiles hence it reiterates the relevance and the sustainability of achievements of the previous UNDP/GEF project.

Last but not least, the physical treatment at Lam Hoa site is conducted in line with the technical guidelines developed under the previous and included in the Circular 30 of the Government. Therefore, the success in the removal of contaminated soil and DDT stockpile proves the high technical quality of the phased approach for contaminated site assessment and treatment.

• Agreement between MONRE and MOIT /VINACHEMIA on mercury-related activities

Another element of good practice was the agreement between MONRE and MOIT /VINACHEMIA on mercury-related activities. The agreement was reflection of the increased relevance of the Component 4 after Vietnam had ratified the Minamata convention and has effectively made a redistribution of responsibilities for implementation of mercury-related tasks and activities in the project. Through the adjustments, the responsibilities in implementation were delineated according to the respective functional areas of relevant national stakeholders (i.e. environmental protection and management of chemicals) rather than on the nature of the pollutant.

On the side of the less successful practices the following can be brought to attention:

It follows from the analysis of the project logframe that the project designers anticipated assignment of priorities in implementation of some outputs. It is logical that the outputs that have their completion targets in the project logframe earlier than the end of the project end date were supposed to be implemented in the fast track mode. For example, output 1.2.4 (development of market-based policy for promotion of POPs release and disposal reduction) and output 3.1.2 (development of risk management procedures for contaminated sites) were designed so that the resulting deliverables in the form of policies, regulations and technical guidelines would be available early in the project implementation period to provide technical input and guidance for implementation of related outputs, such as preparation of environmental protection plans in the provinces and conduct of risk assessment procedures at contaminated sites. However, the evaluators found that at the MTR stage the above two "priority" outputs have barely started implementation and consequently have not provided the expected benefits for other project activities and outputs. It appears that there was no prioritization in the

implementation planning was made. Consequently, Outcome 3.2 on actual site assessment and remediation is being implemented in parallel or in implementation of some parts is preceding the development of relevant policies, regulations and technical guidelines.

6. ANNEXES

6.1. Annex 1: Mid-term Review Terms of Reference

This is the Terms of Reference (ToR) for the UNDP-GEF Midterm Review (MTR) of the full -sized project titled Viet Nam POPS and Sound Harmful Chemicals Management Project (PIMS5154) implemented through Vietnam Environment Administration (VEA)/ Ministry of Natural Resources and Environment (MONRE) as the UNDP's National Implementing Partner (NIP) and The Vietnam Chemicals Agency (VINACHEMIA)/Ministry of Industry and Trade (MOIT), which is to be undertaken in 2015-2018. The project started on the 29th January 2016 and will be in its third year of implementation in 2018. This ToR sets out the expectations for this MTR. The MTR process must follow the guidance outlined in the document Guidance For Conducting Midterm Reviews of *UNDP-Supported, GEF-Financed Projects* (http://web.undp.org/evaluation/guidance.shtml#gef).

2. PROJECT BACKGROUND INFORMATION

The project was designed to continued reduction of environmental and health risks through POPs and harmful chemicals release reduction achieved by provision of an integrated institutional and regulatory framework covering management and reporting of POPs and harmful chemicals within a national sound chemicals management framework and targeted development of POPs contaminated sites management capacity that builds on experience from GEF-4 projects and specifically built a management plan at provincial level to assess risk and implement release reduction measures at all the POPs contaminated sites in two provinces.

The specific project objectives are to strengthen national capacity on safety management of POPs and harmful chemicals; control and reduce release of POPs/PTS to environment from POPs/PTS contaminated site; perform a preliminary inventory of mercury sources and draft a roadmap on mercury reduction.

In order to achieve the project objective, four project components are envisaged:

Component 1. Policy framework for sound chemicals management, including POPs/PTS developed and implemented.

Component 2. Monitoring and reporting of POPs and PTS

Component 3. Management of POPs contaminated sites

Component 4. National mercury baseline inventory and release reduction.

Total resources required: USD 13,600,000
Total allocated resources: USD 13,600,000
GEF: USD 2,550,000

Parallel (In kind & In cash):

MONRE: USD 7,900,000
 MOIT: USD 150,000
 JICA: USD 3,000,000

Project arrangement

The project is financed with funding from the GEF and UNDP acts as the GEF Implementing Agency. In the context of the UNDP, the project will be executed by MONRE, which will assume the overall responsibility for the achievement of project results as the UNDP's National Implementing Partner (NIP). This NIP will be subject to the micro assessment and subsequent quality assurance activities as per Harmonized Approach to Cash Transfers to Implementing Partners (HACT) framework. UNDP will provide overall management and guidance from its Country Office in Hanoi and the Asia Pacific Regional Centre (APRC) in Bangkok, and will be responsible for monitoring and evaluation of the project as per normal GEF and UNDP requirements.

MONRE will designate a senior official as the National Project Director (NPD) for the project. The NPD will
be responsible for overall guidance to project management, including adherence to the Annual Work Plan
(AWP) and achievement of planned results as outlined in the ProDoc, and for the use of UNDP funds
through effective management and well established project review and oversight mechanisms. The NPD
also will ensure coordination with various ministries and agencies provide guidance to the project team
to coordinate with UNDP, review reports and look after administrative arrangements as required by the

Government of Viet Nam and UNDP. The project will be executed according to UNDP's National Implementation Modality (NIM), as per the NIM project management implementation guidelines agreed by UNDP and the Government of Viet Nam.

- The Project Steering Committee (PSC) will have oversight of the Project Management Unit (PMU). The PSC will consist of a Chairperson (MONRE Vice Minister); with PSC members from MOIT, UNDP Viet Nam, MARD, MOH. The primary functions of the PSC will be to provide the necessary direction that allows the Project to function and achieve its policy and technical objectives, and to approve the annual Project plans and M&E reports.
- The PMU staff will report to the National Project Director (NPD). The NPD assigned by National Implementing Partner -MONRE will be responsible to MONRE, MOIT, the PSC and UNDP for implementing the Project, planning activities and budgets, recruiting specialists, conducting training workshops and other activities to ensure the Project is executed as per approved work plans.
- As a senior supplier, UNDP also has a role of project assurance. This role will be exercised by the UNDP Programme Officer responsible for the project, based in the UNDP Country Office (CO), and a Visiting International Technical Advisor (VSTA), funded by the project.
- Both the PMU will implement mechanisms to ensure ongoing stakeholder participation and effectiveness with the commencement of the Project by conducting regular stakeholder meetings, issuing a regular project electronic newsletter, conducting feedback surveys, implementing strong project management practices, and having close involvement with UNDP Viet Nam as the GEF Implementing Agency.

3. OBJECTIVES OF THE MTR

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, its risks to sustainability.

4. MTR APPROACH & METHODOLOGY

The MTR must provide evidence-based information that is credible, reliable and useful. The MTR team will review all relevant sources of information including documents prepared during the preparation phase (i.e. PIF, UNDP Initiation Plan, UNDP Environmental & Social Safeguard Policy, the Project Document, project reports including Annual Project Review/PIRs, project budget revisions, lesson learned reports, national strategic and legal documents, and any other materials that the team considers useful for this evidence-based review). The MTR team will review the baseline GEF focal area Tracking Tool submitted to the GEF at CEO endorsement, and the midterm GEF focal area Tracking Tool that must be completed before the MTR field mission begins.

The MTR team is expected to follow a collaborative and participatory approach¹ensuring close engagement with the Project Team, government counterparts (the GEF Operational Focal Point), the UNDP Country Office(s), UNDP-GEF Regional Technical Advisers, and other key stakeholders. Engagement of stakeholders is vital to a successful MTR². Stakeholder involvement should include interviews with stakeholders who have project responsibilities, including but not limited to Department of Pollution Control and Department of Waste Management and Environmental Improvement/Vietnam Environment Administration (VEA)/ Ministry of Natural Resources and Environment (MONRE), the Viet Nam GEF Operational Focal Point, The Vietnam Chemicals Agency (VINACHEMIA)/Ministry of Industry and Trade (MOIT); executing agencies, senior officials and task team/ component leaders, key experts and consultants in the subject area, Project Steering Committee (PSC), Project Management Unit (PMU), project stakeholders, academia, local government and CSOs, etc. Additionally, the MTR team is expected to conduct field missions to QuangBinh and Nghe An.

The final MTR report should describe the full MTR approach taken and the rationale for the approach making explicit the underlying assumptions, challenges, strengths and weaknesses about the methods and approach of the review.

¹For ideas on innovative and participatory Monitoring and Evaluation strategies and techniques, see UNDP Discussion Paper: Innovations in Monitoring & Evaluating Results, 05 Nov 2013

²For more stakeholder engagement in the M&E process, see the UNDP Handbook on Planning, Monitoring and Evaluating for Development Results, Chapter 3, pg. 93.

5. DETAILED SCOPE OF THE MTR

The MTR team will consist of two independent consultants that will conduct the MTR - one international team leader (with experience and exposure to projects and evaluations in other regions globally) and one national expert (team member).

The MTR team will first conduct a document review of project documents (i.e. PIF, UNDP Initiation Plan, Project Document, ESSP, Project Inception Report, PIRs, Finalized GEF focal area Tracking Tools, Project Appraisal Committee meeting minutes, Financial and Administration guidelines used by Project Team, project operational guidelines, manuals and systems, etc.) provided by the Project Team and Commissioning Unit. Then they will participate in a MTR inception workshop to clarify their understanding of the objectives and methods of the MTR, producing the MTR inception report thereafter. The MTR mission will then consist of interviews and site visits to (Nghe An and QuangBinh).

The MTR team will assess the following four categories of project progress and produce a draft and final MTR report. See the *Guidance For Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects* (http://web.undp.org/evaluation/guidance.shtml#gef) for requirements on ratings. No overall rating is required.

The MTR team will assess the following four categories of project progress. See the *Guidance For Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects* for extended descriptions.

i. Project Strategy

Project design:

- 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. Were lessons from other relevant projects properly incorporated into the project design?
- Review how the project addresses country priorities. Review country ownership. Was the project concept in line with the national sector development priorities and plans of the country (or of participating countries in the case of multi-country projects)?
- Review decision-making processes: were perspectives of those who would be affected by project decisions, those who could affect the outcomes, and those who could contribute information or other resources to the process, taken into account during project design processes?
- Review the extent to which relevant gender issues were raised in the project design. See Annex 9 of Guidance For Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects for further guidelines.
- If there are major areas of concern, recommend areas for improvement.

Results Framework/Logframe:

- Undertake a critical analysis of the project's logframe 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.
- Are the project's objectives and outcomes or components clear, practical, and feasible within its time frame?
- Examine if progress so far has led to, or could in the future catalyse beneficial development effects (i.e. income generation, gender equality and women's empowerment, improved governance etc...) that should be included in the project results framework and monitored on an annual basis.
- Ensure broader development and gender aspects of the project are being monitored effectively. Develop and recommend SMART 'development' indicators, including sex-disaggregated indicators and indicators that capture development benefits.

ii. Progress Towards Results

Progress Towards Outcomes Analysis:

• Review the logframe indicators against progress made towards the end-of-project targets using the Progress Towards Results Matrix and following the *Guidance For Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects*; colour code progress in a "traffic light system" based on the level of progress achieved;

assign a rating on progress for each outcome; make recommendations from the areas marked as "Not on target to be achieved" (red).

Table. Progress Towards Results Matrix (Achievement of outcomes against End-of-project Targets)

| Project Strategy | Indicator ³ | Baseline Level ⁴ | Level in 1 st PIR (self- reported) | Midterm Target ⁵ | End-of- project Target | Midterm Level & Assessment ⁶ | Achievement Rating ⁷ | Justificatio n for Rating |
|---------------------|----------------------------|--------------------------------|---|--------------------------------|------------------------------|---|------------------------------------|---------------------------------|
| Objective: | Indicator (if applicable): | | | | | | | |
| Outcome 1: | Indicator 1: | | | | | | | |
| | Indicator 2: | | | | | | | - |
| | Indicator 3: | | | | | | | - |
| Outcome 2: | Indicator 4: | | | | | | | |
| | Etc. | | | | | | | |
| Etc. | | | | | | | | |

Indicator Assessment Key

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

In addition to the progress towards outcomes analysis:

- Compare and analyse the GEF Tracking Tool at the Baseline with the one completed right before the Midterm Review.
- Identify remaining barriers to achieving the project objective in the remainder of the project.
- By reviewing the aspects of the project that have already been successful, identify ways in which the project can further expand these benefits.

iii. Project Implementation and Adaptive Management

Management Arrangements:

- Review overall effectiveness of project management as outlined in the Project Document. Have
 changes been made and are they effective? Are responsibilities and reporting lines clear? Is decisionmaking transparent and undertaken in a timely manner? Recommend areas for improvement.
- Review the quality of execution of the Executing Agency/Implementing Partner(s) and recommend areas for improvement.

³ Populate with data from the Logframe and scorecards

⁴ Populate with data from the Project Document

⁵ If available

⁶ Colour code this column only

⁷ Use the 6 point Progress Towards Results Rating Scale: HS, S, MS, MU, U, HU

 Review the quality of support provided by the GEF Partner Agency (UNDP) and recommend areas for improvement.

Work Planning:

- Review any delays in project start-up and implementation, identify the causes and examine if they have been resolved.
- Are work-planning processes results-based? If not, suggest ways to re-orientate work planning to focus on results?
- Examine the use of the project's results framework/ logframe as a management tool and review any changes made to it since project start.

Finance and co-finance:

- Consider the financial management of the project, with specific reference to the cost-effectiveness of interventions
- Review the changes to fund allocations as a result of budget revisions and assess the appropriateness and relevance of such revisions.
- Does the project have the appropriate financial controls, including reporting and planning, that allow management to make informed decisions regarding the budget and allow for timely flow of funds?
- Informed by the co-financing monitoring table to be filled out, provide commentary on co-financing: is co-financing being used strategically to help the objectives of the project? Is the Project Team meeting with all co-financing partners regularly in order to align financing priorities and annual work plans?

Project-level Monitoring and Evaluation Systems:

- Review the monitoring tools currently being used: Do they provide the necessary information? Do they
 involve key partners? Are they aligned or mainstreamed with national systems? Do they use existing
 information? Are they efficient? Are they cost-effective? Are additional tools required? How could they
 be made more participatory and inclusive?
- Examine the financial management of the project monitoring and evaluation budget. Are sufficient resources being allocated to monitoring and evaluation? Are these resources being allocated effectively?

Stakeholder Engagement:

- Project management: Has the project developed and leveraged the necessary and appropriate partnerships with direct and tangential stakeholders?
- Participation and country-driven processes: Do local and national government stakeholders support the objectives of the project? Do they continue to have an active role in project decision-making that supports efficient and effective project implementation?
- Participation and public awareness: To what extent has stakeholder involvement and public awareness contributed to the progress towards achievement of project objectives?

Reporting:

- Assess how adaptive management changes have been reported by the project management and shared with the Project Board.
- Assess how well the Project Team and partners undertake and fulfil GEF reporting requirements (i.e. how have they addressed poorly-rated PIRs, if applicable?)
- Assess how lessons derived from the adaptive management process have been documented, shared with key partners and internalized by partners.

Communications:

- Review internal project communication with stakeholders: Is communication regular and effective? Are there key stakeholders left out of communication? Are there feedback mechanisms when communication is received? Does this communication with stakeholders contribute to their awareness of project outcomes and activities and investment in the sustainability of project results?
- Review external project communication: Are proper means of communication established or being established to express the project progress and intended impact to the public (is there a web presence, for example? Or did the project implement appropriate outreach and public awareness campaigns?)
- For reporting purposes, write one half-page paragraph that summarizes the project's progress towards results in terms of contribution to sustainable development benefits, as well as global environmental benefits.

iv. Sustainability

- Validate whether the risks identified in the Project Document, Annual Project Review/PIRs and the ATLAS Risk Management Module are the most important and whether the risk ratings applied are appropriate and up to date. If not, explain why.
- In addition, assess the following risks to sustainability:

Financial risks to sustainability:

• What is the likelihood of financial and economic resources not being available once the GEF assistance ends (consider potential resources can be from multiple sources, such as the public and private sectors, income generating activities, and other funding that will be adequate financial resources for sustaining project's outcomes)?

Socio-economic risks to sustainability:

• Are there any social or political risks that may jeopardize sustainability of project outcomes? What is the risk that the level of stakeholder ownership (including ownership by governments and other key stakeholders) will be insufficient to allow for the project outcomes/benefits to be sustained? Do the various key stakeholders see that it is in their interest that the project benefits continue to flow? Is there sufficient public / stakeholder awareness in support of the long term objectives of the project? Are lessons learned being documented by the Project Team on a continual basis and shared/ transferred to appropriate parties who could learn from the project and potentially replicate and/or scale it in the future?

Institutional Framework and Governance risks to sustainability:

• Do the legal frameworks, policies, governance structures and processes pose risks that may jeopardize sustenance of project benefits? While assessing this parameter, also consider if the required systems/mechanisms for accountability, transparency, and technical knowledge transfer are in place.

Environmental risks to sustainability:

• Are there any environmental risks that may jeopardize sustenance of project outcomes?

Conclusions & Recommendations

The MTR team will include a section of the report setting out the MTR's evidence-based conclusions, in light of the findings.

Recommendations should be succinct suggestions for critical intervention that are specific, measurable, achievable, and relevant. A recommendation table should be put in the report's executive summary. See the *Guidance For Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects* for guidance on a recommendation table.

The MTR team should make no more than 15 recommendations total.

Ratings

The MTR team will include its ratings of the project's results and brief descriptions of the associated achievements in aMTR Ratings & Achievement Summary Table in the Executive Summary of the MTR report. See Annex E for ratings scales. No rating on Project Strategy and no overall project rating is required.

Table. MTR Ratings & Achievement Summary Table for (Project Title)

| Measure | MTR Rating | Achievement Description |
|--|--|-------------------------|
| Project Strategy | N/A | |
| | Objective Achievement Rating: (rate 6 pt. scale) | |
| | Outcome 1 Achievement Rating: (rate 6 pt. scale) | |
| Progress Towards Results | Outcome 2 Achievement Rating: (rate 6 pt. scale) | |
| | Outcome 3 Achievement Rating: (rate 6 pt. scale) | |
| | Etc. | |
| Project Implementation & Adaptive Management | (rate 6 pt. scale) | |
| Sustainability | (rate 4 pt. scale) | |

6. TIMEFRAME

The total duration of the MTR will be approximately 20 days for international consultant and 15 days for national consultants over a time period of 16 weeks starting April 2018, and shall not exceed five months from when the consultant(s) are hired. The tentative MTR timeframe is as follows:

| TIMEFRAME | ACTIVITY |
|---|---|
| (15 January, 2018) | Application closes |
| (30 January, 2018) | Select MTR Team |
| Week 1 of April, 2018 | Prep the MTR Team (handover of Project Documents) |
| Week 2 of April, 2018 | Document review and preparing MTR Inception Report |
| Week 3 of April, 2018 | Finalization and Validation of MTR Inception Report - latest start of MTR mission |
| Week 4 of April -week 1 of May, 2018 | MTR mission: stakeholder meetings, interviews, field visits |
| Week 4 of April-week 1 of May, 2018 | Mission wrap-up meeting & presentation of initial findings- earliest end of MTR mission |
| Week 2 of May, 2018 | Preparing draft report |
| Week4 of May, 2018 | Incorporating audit trail from feedback on draft report/Finalization of MTR report (note: accommodate time delay in dates for circulation and review of the draft report) |
| Week 1 of June, 2018 | Preparation & Issue of Management Response |
| Week 2 - 3 of June, 2018 | Expected date of full MTR completion |

Options for site visits should be provided in the Inception Report.

7. MIDTERM REVIEW DELIVERABLES

| # | Deliverable | Description | Timing | Responsibilities |
|---|---------------|--|-----------------------|---------------------------|
| | MTR Inception | MTR team clarifiesobjectives and | No laterthan 2 | MTR team submits to |
| | Report | methods of MidtermReview | Weeksbeforethe MTR | theCommissioningUnit and |
| | | | mission: 18April 2018 | projectmanagement |
| | Presentation | InitialFindings | End of MTR mission: | MTR Team presents to |
| | | | 4 May 2018 | project management and |
| | | | | theCommissioningUnit |
| | DraftFinal | Full report (usingguidelines on | Within 3 weekof the | Sent to |
| | Report | contentoutlined in Annex B) withannexes | MTR mission: | theCommissioningUnit, |
| | _ | | 25 May 2018 | reviewed by RTA, Project |
| | | | | CoordinatingUnit, GEF OFP |
| | Final Report* | Revised report with audit | Within 1 weekof | Sent to |
| | | traildetailinghowallreceivedcommentshave | receiving UNDP | theCommissioningUnit |
| | | (and havenot) beenaddressed in thefinal | comments on draft: | - |
| | | MTR report | 8 June 2018 | |
| | | _ | | |

^{*}Thefinal MTR report mustbe in English. Ifapplicable, theCommissioningUnitmaychoose to arrangefor a translation of the report into a language more widelyshared by nationalstakeholders.

8. MTR ARRANGEMENTS

The commissioning unit will contract the consultants and ensure the timely provision of per diems and travel arrangements within the country for the MTR team. The Project Team will be responsible for liaising with the MTR team to provide all relevant documents, set up stakeholder interviews, and arrange field visits.

9. TEAM COMPOSITION AND WORK DISTRIBUTION

The principal responsibility for managing this MTR resides with the Commissioning Unit. The Commissioning Unit for this project's MTR is *the UNDP Country Office*.

The selected consultants will work closely with UNDP programme Officer and Project Management Unit (PMU) under the guidance of the Head of Climate Change and Environment Unit at UNDP Viet Nam.

With the exception of a 7-day field mission, the members of the MTR team are expected to work mostly from their home based offices and communicate among themselves and with UNDP, PMU and other stakeholders electronically. The MTR team can seek out both UNDP and PMU for reasonable assistance and support that they may require to fulfill their responsibilities.

A team of two independent consultants will conduct the MTR - one international consultant (20 work-days) and one national consultant (15 work-days). The consultants cannot have participated in the project preparation, formulation, and/or implementation (including the writing of the Project Document) and should not have a conflict of interest with project's related activities.

The selection of consultants will be aimed at maximizing the overall "team" qualities in the following areas:

International consultant

- Recent experience with result-based management evaluation methodologies;
- Experience applying SMART indicators and reconstructing or validating baseline scenarios;
- Competence in adaptive management, as applied to POPs and chemical management;
- Experience working with the GEF or GEF-evaluations;
- Experience working in Asia is an advantage;
- Work experience in relevant technical areas for at least 10 years;
- Demonstrated understanding of issues related to gender and POPs and chemical management; experience in gender sensitive evaluation and analysis.
- Excellent communication skills;
- · Demonstrable analytical skills;
- · Project evaluation/review experiences within United Nations system will be considered an asset;
- A Master's degree in chemical engineering, environment, or other closely related field.

Specifically, the international expert (team leader) will perform the following tasks:

• Lead and manage the evaluation mission;

- Design the detailed evaluation scope and methodology (including the methods for data collection and analysis);
- Decide the division of labor within the evaluation team;
- Conduct an analysis of the outcome, outputs and partnership strategy (as per the scope of the evaluation described above);
- Draft related parts of the evaluation report; and
- Finalize the entire evaluation report.

National consultant

- Recent experience with result-based management evaluation methodologies;
- Experience applying SMART indicators and reconstructing or validating baseline scenarios;
- Competence in adaptive management, as applied to POPs and chemical management;
- Experience working with the GEF or GEF-evaluations;
- Work experience in relevant technical areas for at least 10 years;
- Demonstrated understanding of issues related to gender and POPs and chemical management; experience in gender sensitive evaluation and analysis.
- Excellent communication skills;
- Excellent English language;
- Demonstrable analytical skills;
- Project evaluation/review experiences within United Nations system will be considered an asset;
- A Master's degree in chemical engineering, environment, or other closely related field.

Specifically, the national expert will perform the following tasks:

- Documentation of evaluation and data gathering and consultation meetings;
- Contributing to the development of evaluation plan and methodology;
- Conducting specific elements of the evaluation determined by the International Lead Consultant;
- Contributing to presentation of the evaluation findings and recommendations at the evaluation wrap-up meeting;
- Contributing to the drafting and finalization of the MTR reports, notes of the meetings and other related documents prepared by the international consultant
- Performing translation for the international consultants during meetings with various stakeholders and necessary documents discussed during the international consultant's mission.

10. PAYMENT MODALITIES AND SPECIFICATIONS

- 10% of contract amount shall be paid approval of the final MTR Inception Report
- 30% of contract amount shall be paid upon submission of the draft MTR report
- 60% of contract amount shall be paid upon finalization of the MTR report

6.2. Annex 2: Project Stakeholders' Map

| Government Agencies | Key Function and Mandate |
|--|--|
| Ministry of Natural Resources and Environment (MONRE) | i) State management of environment, climate change, etc. ii) Environmental prevention and control, remediation of environmental incidents and degradation, etc. iii) Hazardous waste and POP stockpile & contaminated site management iv) Revise and add the list of facilities that are seriously environmental polluted v) Set up and manage national environmental monitoring system |
| Vietnam Environment Administration (VEA/MONRE) | i) State management of environmental pollution control ii) Control preparation of lists of environmentally polluted facilities of various sectors and provinces iii) Organize implementation of prevention measures, emergency and preparedness plans, environmental remediation plans, etc. iv) Monitor environment quality v) Waste management including hazardous waste and environmental enhancement vi) Organize implementation of national environmental monitoring and information vii) Lead preparation of national environmental report and NIP update viii) National focal point of Stockholm convention on POP, Basel Convention and Montreal Protocol on ODS There are 2 departments under VEA: Pollution Control Department (PCD) and Waste Management & Environment Improvement Department (WMEI) that responsible to implement above mentioned duty. PCD is assigned for duty of i, ii, iii, iv in air, vi, vii, viii with Stockholm convention. WMEI is assigned for duty of iv in soil and water, v, vi, viii with Basel Convention |
| Ministry of Industry and Trade (MOIT) | i) State management of overall chemical management, chemicals used in industries, consumer products, scheduled chemicals of the chemical Weapon convention (CWC), including inorganic fertilizers ii) Lead and coordinate with other ministries to prepare national chemical list of prohibited, restricted and conditional chemicals; list of declaration chemicals; list of hazardous chemicals required to prepare emergency and preparedness plans; list of chemical prohibited to use in household and consumer products iii) Chemical handling and safety, iv) GHS, REACH & ROSH |
| Vietnam Chemicals Agency (VINACHEMIA/ MOIT) | National Focal Point of Chemicals Weapon Convention, Rotterdam Convention (industrial sector); Minamata Convention on Mercury Grant permissions for trading and production of toxic chemicals used for special aims |
| Industrial Safety Technique and Environment Agency (ISEA)/MOIT | i) State management over safety techniques, environmental protection in industry and trade ii) Guiding, instructing and inspecting the implementation of the legal provisions on labour safety iii) Propose a list of machines, equipment's and materials subject to strict labour safety requirement within scope pf MOIT iv) Develop and organize implementation of programs, planning, projects on environmental protection in industry and trade v) Guide, manage and control wastes, noises, environmental incidents, environmental pollution, remediation and restoration in industry, etc. |

| i) State management of agriculture, forestry, sea products, aquaculture, rural development including pesticides and veterinary medicine used in the above areas; safety of agricultural and sea products ii) Direct implementation of state management of food safety regarding agricultural, forestry and sea – products iii) Instruct implementation of state management of environmental protection regarding production, business and services under the ministry iv) State management of organic fertilizers v) National focal point for Rotterdam convention on pesticides i) Sate management of over plant protection and quarantine, pest prevention, pesticides used in agriculture ii) Leading and Guiding implementation of plant protection activities iii) Propose a list of pesticides, plant protection medicines allowed or restricted to use in Viet Nam iv) Organize plant protection chemicals registration, v) Instruct and guide implementation of plant protection chemicals, sent production, trade, processing, packaging of plant protection chemicals, restricted and disinfectant for domestic and medical use, cosmeties including their safety use ii) State management of food safety in food production facilities, business, etc. iii) Environmental protection in healthcare sector including medical waste tincluding food additives, etc. iii) Cambour, Invalids and Social Affairs Wietham Health Environment Management Agency (VIHEMA/MOH) Ministry of Labour, Invalids and Social Affairs Ministry of Labour, Invalids an | | |
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| and Social Affairs Department of Labour Safety (DLS)/MOLISA Ministry of Science and Technology (MOST) Ministry of Transport (MOT) Provincial People's Committee (PDC/CPC) and Adoption of list of hard, toxic and dangerous jobs/occupations iv) Guiding and controlling implementation of national regulations on occupational safety State management of i) ii) iii) technological development, innovation and transfer; National standard and technical regulation system; labels, codes, bar codes, and delimitation of goods and products and goods iv) guiding and state management of good labeling national wide i) State management of transportation sector including safety transportation and environmental protection in transportation area (1) Prepare overall provincial social- economic development plan, sector development plan and rural and urban development plans (2) Together with national agencies, prepare national /sectoral programs located in | | |
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| Safety (DLS)/MOLISA iv) Guiding and controlling implementation of national regulations on occupational safety State management of i) ii) iii) technological development, innovation and transfer; National standard and technical regulation system; labels, codes, bar codes, and delimitation of goods and products and goods iv) guiding and state management of good labeling national wide Ministry of Transport (MOT) Provincial People's Committee (PDC/CPC) (2) Together with national agencies, prepare national /sectoral programs located in | | |
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| Technology (MOST) technological development, innovation and transfer; National standard and technical regulation system; labels, codes, bar codes, and delimitation of goods and products and goods iv) guiding and state management of good labeling national wide Ministry of Transport (MOT) Provincial People's Committee (PDC/CPC) (2)Together with national agencies, prepare national /sectoral programs located in | | |
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| Provincial People's Committee (PDC/CPC) (1) Prepare overall provincial social- economic development plan, sector development plan and rural and urban development plans (2) Together with national agencies, prepare national /sectoral programs located in | | |
| Committee (PDC/CPC) development plan and rural and urban development plans (2)Together with national agencies, prepare national /sectoral programs located in | | |
| (2)Together with national agencies, prepare national /sectoral programs located in | | |
| | | |
| | (PPC/CPC) | |

| Ministry of Agriculture and Rural Development (MARD) | i) State management of agriculture, forestry, sea products, aquaculture, rural development including pesticides and veterinary medicine used in the above areas; safety of agricultural and sea products ii) Direct implementation of state management of food safety regarding agricultural, forestry and sea – products iii) Instruct implementation of state management of environmental protection regarding production, business and services under the ministry iv) State management of organic fertilizers v) National focal point for Rotterdam convention on pesticides |
|--|--|
| | (3)Direct implementation and control of production and use of pesticide, fertilizers, veterinary medicines and other biological products to server for agriculture (4) Direct implementation and control and inspection of technical safety of transportation means (5) Direct and organize implementation of environmental protection and enhancement; environmental degradation and pollution and responsibility of |
| | polluter to remediate polluted environment (6)Control and manage transportation of hazardous substances in accordance with legislation |
| Provincial Departments of Industry and Trade (DOIT) | (1) Advise and assist PPC in State management of industries and commerce, including chemical sector in the province/city (2)Lead and cooperate with relevant agencies in controlling management, use, storage, and transportation of chemicals, industrial explosive material, liquid gases, mining, import/export, etc. including safety issues and emergency and preparedness plan |
| Provincial Departments of Agriculture and Rural Development (DARD) | (1) Advise and assist PPC in State management of agriculture, forestry, sea products, aqua-culture, rural development including safety of agricultural and aqua products (2)Control use of pesticide in agriculture |
| Provincial Departments of Health (DOH) | (1) Advise and assist PPC in State management of Healthcare sector, food safety and hygiene, insecticide and disinfectants for domestic and medical use (2)Organize implementation of medical waste management plan |
| Provincial Departments of Labor, War Invalids and Social Affairs (DOLISA) | (1) Advise and assist PPC in State management of labour sector including occupational safety in chemical environment |
| Provincial Departments of Natural Resources and the Environment (DONRE) | (4) Instruct preparation and organize implementation of environmental monitoring and monitoring database in the province |

6.4. Annex 3: Progress Towards Results Matrix (Achievement of outcomes against end-of-project targets)

| Results | Indicator | Baseline | Targets End of Project | Mid-Term Level Assessment | Achievement Rating |
|--|---|---|--|--|--------------------------------------|
| Project Objective Continued reduction of environmental and health risks through POPs, mercury and harmful chemicals release and exposure reduction achieved by provision of an integrated institutional and regulatory framework | 1. Progress of POP/PTS regulations developed and integrated into the newly established legal framework in Vietnam, and in compliance with requirement of the Stockholm and other relevant international conventions 2. Level of institutional capacity strengthened to manage, monitor, and remediate POP/PTS, including Mercury 3. Level of environmental and health risks reduction. -Volume of POPs contaminated soil treated and safeguarded -Number of local people benefited from reduced exposure to POPs -Ratio of women/men benefited | SC requirements are not yet completely integrated in the existing regulation on chemicals/POP management. Lacking of a comprehensive POPs/PTS Management Information System following a PRTR Scheme which prevent good planning and reporting Limited national capacity and knowledge on industrial contaminated site management. A substantial experience has been achieved from bilateral and GEF POP/chemical related projects. However the results are still project based, not well integrated to support the GoV having a comprehensive regulation system on POPs/PTS management. | 1. Policy framework for chemicals/POPs management improved meeting with the Stockholm Convention and other related international conventions, and expressing close links between environmental protection policy with chemical management policy. National Monitoring capacity improved to track POPs/PTS including mercury 2.A POPs tracking tool, database and PRTR system established and demonstrated in at least one province 3. Establishment of provincial – level planning for the clean-up of POPs contaminated sites in two provinces. - at least 40 tons of pure DDT in Quang Binh are treated properly follow international environmental standard | Progress of work for individual components/outcomes fated: The legislative component - Medium Satisfactory The POPs reporting - Medium Satisfactory POPs/PTS monitoring capacity - Unsatisfactory Policies and guidelines for POPs contaminated sites - Medium Unsatisfatory Management of contaminated sites - Medium Satisfactory Mercury baseline source and release inventory - Medium Unsatisfactory Public awareness on mercury-Medium Unsatisfactory | Moderately Unsatisfactory (MU) |

| Results | Indicator | Baseline | Targets End of Project | Mid-Term Level Assessment | Achievement Rating |
|---|--|---|--|--|------------------------------------|
| Outcome 1.1. Overall policy framework and specific regulatory measures covering environmentally sound management of POPs and PTS through life cycle management developed and implemented. | Availability of regulations in Vietnam integrated to take into account in a consistent way the requirements of the Stockholm Convention on POPs Availability of a regulatory framework to ensure monitoring and reporting of POPs is established | The existing national regulations on chemicals is based on the GHS and includes provisions of international conventions. However the existing regulations are not fully compliant with the SC requirement, still fragmented and not fully harmonized due to issue by different Ministries. Provisions of new POPs as required by the SC are also not yet included in the chemical and environment policy framework | The key regulations in Vietnam are integrated to take into account in a consistent way the requirements of the Stockholm Convention on POPs. A regulatory framework to ensure monitoring and reporting of POPs is established | Recruitment of consultants completed for all five outputs; Work in progress; Stakeholder consultations will be necessary before the outputs are fully achieved | Moderately Satisfactory (MS) |
| Outcome 1.2 Key institutions have knowledge and skills to formulate and implement neccesary chemicals and environment policies, consistent with sound chemicals management principles and international convention requirements | Achievement of active participation of Vietnam in the ICCM / SAICM. Evidences of increased adoption of chemical risk assessment criteria in law-making and decision making. Number of institutions / staff successfully trained. Availability of market based policy in one or two sectors relevant to POPs. | A certain number of POPs training initiatives have been carried out and is being carried out in the framework of previous GEF4 projects There is the need to build on the experience of these training activities and to establish a training system which consistently increase capacity on POPs, management of hazardous chemicals and hazardous waste in the perspective of ensuring consistency and coordination of environmental related regulation with SC. | By the end of the project Vietnam has consolidated its participation to ICCM / SAICM to benefit for international knowledge and have its issues and arguments on chemical management brought at the international level. A procedure for risk assessment is adopted in law-making and decision making processes related to chemicals and hazardous waste. Relevant institution skills on POPs management, risk assessment, international regulation on chemicals and their relationship with Vietnamese situation increased by means of certified training. A market based policy on waste and chemicals management and public / private partnership established. | Two outputs that are critical for the achievement of the outcome, i.e. skills and knowledge for formulation and implementation of policies consistent with sound chemicals management and international conventions are only at the stage of approved TOR; The output on market-based policy and public-private partnerships for hazardous POPs waste reduction and management is at risk not to be achieved by the end of the project since these topics are by nature innovative and ground breaking | Moderately Satisfactory (MU) |

| Results | Indicator | Baseline | Targets End of Project | Mid-Term Level Assessment | Achievement Rating |
|---|--|---|--|--|------------------------------------|
| Outcome 2.1. National institutions provide comprehensive and coordinated ambient environment and receptor POPs /PTS monitoring that is consolidated into a national database and utilized for high quality reporting to the GoV/National Assembly and the Convention. | National POPs/PTS monitoring capacity assessed and POPs/PTS monitoring program upgraded to ensure POPs/PTS tracking | POPs Monitoring capability increased in the last years thanks to governmental initiatives, support of international donors, and GEF projects related to Dioxin contaminated sites, POP pesticide stockpiles, PCBs. However, the monitoring capability on U-POPs emitted from industrial sources and other POPs is still very limited. Existing POPs laboratories are mainly dedicated to sampling and analysis of POP pesticide, PCBs. Some labs are able to sample and analyze Dioxin. A target level for PCDD/F has been established in the course of the ongoing GEF project on Dioxin contaminated hotspot. | POPs/PTS baseline established for ambient environment (air, water, soil) and receptors (human, biota, food) At least two laboratory accredited for monitoring of new POPs and PTS and integrated in an inter- calibration network of laboratories An upgraded POPs/PTS monitoring programme submitted for GoV approval | Two outputs on track and likely to be achieved by the end of the approved project period; Assessment of POPs/PTS monitoring capacity at the stage of completed recruitment of consultants but could be completed by the end of the project approved period | Moderately Satisfactory (MS) |
| Outcome 2.2 National POPs/PTS laboratory network for support of ambient environment and receptor monitoring certified/accredited. | Availability of accredited laboratories on new POPs integrated in a POP/PTS laboratory calibration network. | A certain number of private or public laboratories having capability to perform sampling and analysis of POPs (Dioxin, PCB, POP pesticides, etc.) is working. Some of the above have participated in roundrobin tests. Howeverthere are no national official analytical methods on the determination of POPs. Alsoa national plan for accreditation and certification of these labs to international standards is missing | Two key laboratories on POPs analysis accredited following ISO 17025 and associated accreditation schemes Up to 80 laboratories technicians and government staff trained on POPs monitoring related activities following international standards and requirement A POPs/PTS database established to contain data related to industrial sources, and POPs contaminated sites in 2 provinces, and all the country-wide available data on POPs environmental monitoring | Consultants recruited for the needs assessment of laboratories and work in progress, follow-up training workshops to be organized only in 2019; Inventory of industrial sources of POPs at the stage of TOR approval; Laboratories for accreditation not selected and the process on accreditation has not started | Unsatisfactory (U) |
| Outcome 3.1 Key policies, regulations and | Availability of policies and guidelines on POPs contaminated sites | In the country a number of separate initiatives on the management of contaminated | A broad policy and guidelines, established to support the implementation of legal and | Work under only one of the three outputs on progress (draft TR on industrial POPs) | Unsatisfactory (U) |

| Results | Indicator | Baseline | Targets End of Project | Mid-Term Level Assessment | Achievement Rating |
|---|---|--|--|--|------------------------------------|
| technical guidlines for management of POPs contaminated sites are in place | management developed and enforced, | sites are being carried out by governmental institutions, international donors, or under GEF projects. These effort are however still fragmented (project base) and not yet capitalized into an harmonized system of laws and guidance. The National Target Programme on Pollution Remedies and Environmental Improvement (approved in 2011) sets an objective by 2015 to recover environment at 100 sites seriously contaminated by POP pesticide stockpile | regulatory framework developed in component 1 for contaminated sites management. | Progress on the other two outputs hampered by delayed recruitment of consultants | |
| Outcome 3.2 Provincial Management Plan for the Demonstration Provinces. | Increased capacity of national and local staff measurable by outcome of trainings and number of staff trained. Increased awareness of the local communities on POPs contaminated sites measurable by interviews and questionnaires. Developed plan for POPs contaminated sites management in 2 provinces. Amount of POPs release to the environment which will be prevented by the implementation of provincial level plan. | A limited training of staff trained on disposal technology and site assessment in the course of previous Dioxin hotspot and Pesticidal POPs GEF/UNDP projects. Further training is needed for comprehensive contaminated site assessment, remediation, technology testing and selection Experience on contaminated sites gathered from the 2 GEF/UNDP projects: the Dioxin hotspots (3 large military sites at airbases) and several pesticidal POPs sites. | A site management plan for the provinces of Nghe An and Binh Duong developed, addressing an estimated amount of 300 POPs pesticide sites and 50 industrial contaminated sites, representing an amount of several thousands tons of POPs contaminated soil (to be quantified) of POPs / PTS contaminated soil and waste, which includes:risk-based site prioritization; estimation of POPs amount and cleanup/disposal cost; logistic planning; GIS database; criteria for technology selection; financial plan; POPs release to the environment significantly reduced as a result of plan implementation after project completion. | The output on clean up of Lam Hoa site achieved by mid-term and will be exceeded; The provincial Environmental Protection Plan for NgheAn submitted for approval The process on replication in other provinces only at the beginning The public awareness output delayed due to delay in procurement | Moderately Satisfactory (MS) |

| Results | Indicator | Baseline | Targets End of Project | Mid-Term Level Assessment | Achievement Rating |
|---|---|---|--|---|--------------------------------------|
| | Number of people benefited from reduced exposure to POPs | | At least 50 staff trained on the management of POPs contaminated sites | | |
| Outcome 4.1. Mercury baseline source and release inventory developed. | Availability of a national baseline mercury source and release inventory, and national mercury release reduction strategy adopted. Number of communication activities carried out and communication products disseminated. | Vietnam is signatory of the Minamata convention on mercury. Limited demonstration of alternatives to mercury carried out under a GEF global project on healthcare waste. Demonstration activities on replacement of mercury carried out in 2 hospitals in the framework of the GEF global project on healthcare waste. Only demonstration activity carried out limited to mercury containing healthcare device Awareness raising activities on mercury carried out at 2 healthcare facilities Legislation on mercury product limited to replacement of Hg containing light bulbs. | By the end of the project - A preliminary mercury inventory and its database developed and implemented - At least 03 activities on mercury related issues conducted to increase awareness and knowledge of mercury | The work on three outputs just started and draft results expected around the end of the approved project period or beyond; Road map/strategy on mercury management at the stage of waiting for approval of Procurement Plan | Moderately Unsatisfactory (MU) |
| Outcome 4.2 Increased knowledge and awareness of mercury source and releases. | Number of communication materials developed and disseminated to increase awareness and knowledge on mercury of relevant stakeholders. | Under the GoV's legislation on chemical management, mercury is managed as all other heavy metals. No special requirement is existed. Low awareness and knowledge on mercury and its related risks, disposal technologies | By the end of the project, leaflet summarizing mercury convention, mercury risks and possible mercury tailored and printed by the project and disseminated national wide. | The TOR for the single output developed but recruitment halted by waiting for approval of Procurement Plan | Moderately Unsatisfactory (MU) |

6.5. Annex 4: Evaluation Matrix

| Evaluation Criteria | Evaluation Questions | Indicators | Data Sources | Data Collection Methods |
|-----------------------------|--|--|--|---|
| Project Strategy | Are the project's objectives and outcomes or components clear, practical, and feasible within its time frame? Does the progress so far indicate that the project could in the future catalyse beneficial development effects that could be included in the project results framework and monitored on an annual basis? Are broader development and gender aspects of the project being monitored effectively? Develop and recommend SMART 'development' indicators, including sex-disaggregated indicators and indicators that capture development benefits How relevant is the project strategy to address the country priorities? Is the project in line with the national sector development priorities and plans? To what extent were perspectives of those affected by project decisions and of those who could affect the outcomes, taken into account during project design processes? Does the project strategy providean effective route towards expected/intended results? To what extent were lessons learned from other relevant projects incorporated into the project design? Are the underlying assumptions for the problem addressed | Project activities in line with the country development and sectoral priorities and plans Activities produce outputs according to the project logframe Lessons learned from previous projects taken into account for implementation Assumptions and risks identified are effectively managed | UNDP programme/project documents UNDP programme/prject Annual Work Plans Programmes/projects/ thematic areas evaluation reports Government's national planning documents Human Development Reports MDG progress reports Government partners progress reports Interviews with beneficiaries UNDP staff Development partners (UN agencies, bilateral development agencies) Government partners involved in specific results/thematic areas Concerned civil society partners | Desk reviews of secondary data Interviews with government partners Interviews with NGOs partners/service providers Interviews with funding agencies and other UNCT Interviews with UNDP staff, development partners and government partners, civil society partners, associations, and federations |
| Progress Towards Results | Which are the aspects of the project that have already been successful and how the project can further expand these benefits? How does the GEF Tracking Tool at the Baseline compare with the GEF TT completed before the Midterm Review? How far has the regional context been taken into consideration while selecting the project/ programme? Was there any partnership strategy in place for implementation of the project and if so how effective was it? | GEF TT used as project management instrument The project has partnership strategy and actions taken to promote cooperation between partners | Concerned associations and federations Project/programme/thematic areas evaluation reports Progress reports on projects UNDP staff Development partners Government partners Beneficiaries Progress reports on projects Programme documents Annual Work Plans/ProgressReports Evaluation reports MDG/Human Development Reports | Desk reviews of secondary data Interviews with government partners, development partners, UNDP staff, civil society partners, associations, and federations |

| Evaluation Criteria | Evaluation Questions | Indicators | Data Sources | Data Collection Methods |
|---|--|--|--|---|
| Project Implementation & Adaptive | Has the project or programme been implemented within the original timeframe and budget? To what extent the work-planning processes are results-based? To what extent has the project's results framework/logframebeen used as a management tool and were there any changes to it since the project start? Have UNDP and the PMU taken prompt actions to solve implementation issues? Have there been any delays in project start-up and implementation and if so what were the causes and how they have been solved? What mechanisms does UNDP have in place to monitor implementation? Are these effective? Have there been any outside factors (e.g. political instability) affecting on implementation effectiveness? | Project implementation within the original timeframe and budget Annual workplans elaborated according to the logframe Implementation issues solved by PMU/UNDP Implementation monitoring tools in place and effectively used | Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit) | Desk reviews of secondary data Interviews with government partners and development partners |
| Management | To what extent financial controls have been established that allow the project management to make informed decisions regarding the budget at any time and allow for the timely flow of funds? Has there been over-expenditure or under-expenditure on the project? Were the resources focused on the set of activities that were expected to produce significant results? Were the project resources concentrated on the most important initiatives or were they scattered/spread thinly across initiatives? | Financial controls established and used to provide feedback on implementation Activities prioritized for achievement of significant results | Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit) | Desk reviews of secondary data Interviews with government partners and development partners |
| | Have changes been made and are they effective? Are the existing responsibilities and reporting lines clear? To what extent is decision-making in the project transparent and undertaken in a timely manner? | Decision-making on implementation transparent and timely Implementation of components with multiple responsible partners clear and timely | Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit) | Desk reviews of secondary data Interviews with government partners and development partners |

| Evaluation Criteria | Evaluation Questions | Indicators | Data Sources | Data Collection Methods |
|--|--|--|---|--|
| Project Implementation & Adaptive Management (continued) | Has the project developed and leveraged partnerships with direct and tangential stakeholders? Do the stakeholders have roles in project decision-making that support efficient and effective project implementation? To which extent has stakeholder involvement and public awareness contributed to the progress towards achievement of project objectives and are there any limitations to stakeholder awareness of project outcomes/ participation in project activities? | Mechanisms for involvement of other stakeholders in place Other stakeholders aware of the project and involved in implementation | Programme documents Annual Work Plans Annual Progress Reports | Desk reviews of secondary data |
| | How the Project Team and partners undertake and fulfillthe GEF reporting requirements? To what extent have lessons derived from the adaptive management process been documented, shared with and internalized by key partners and incorporated into project implementation? Have the PIRs been shared with the Project Board and other key stakeholders? | Lessons for adaptive management documented and taken into account for | Evaluation reports Progress reports UNDP programme staff | Desk reviews of secondary data Interview UNDP programme staff |
| | How regular and effective has been the internal project communication with project stakeholders? Are there any ways of external communication established to inform about the project progress the public? Are there any aspects of the project that might yield excellent communications material as additional project output? | Quality and effectiveness of internal communication Possibilities for additional communication material identified | Evaluation reports Progress reports UNDP programme staff | Desk reviews of secondary data Interview UNDP programme staff |

| Evaluation Criteria | Evaluation Questions | Indicators | Data Sources | Data Collection Methods |
|------------------------|---|---|--|---|
| | What is the likelihood of financial and economic resources not being available once the GEF assistance ends? To what extent financial and economic instruments and mechanisms have been established or will be established to ensure theongoing flow of benefits once the GEF assistance ends? What additional factors are needed to create an enabling environment for continued financing? | Existence of counterpart/stakeholder funding for the project outcomes Additional factors for continued financing identified | Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit) | Desk reviews of secondary data Interviews with government partners and development partners |
| Sustainability | Has the project put in place frameworks, policies, governance structures and processes that will create mechanisms for institutional and technical knowledge transfer after the project's closure? To what extent has the project been developing institutional capacity (systems, structures, staff, expertise, etc.) that will be self-sufficient after the project closure date? Has the project achieved stakeholders' consensus regarding courses of action after the project's closure? | continuation of activities established Level of self-sufficiency of the established institutional frameworks | Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit) | Desk reviews of secondary data Interviews with government partners and development partners |
| | Are there any social or political risks that may jeopardize sustainability of project outcomes? Are there any environmental factors that could undermine and reverse the project's outcomes, including factors that have been identified by project stakeholders? What is the risk that the level of stakeholder ownership (including ownership by governments and other key stakeholders) will be insufficient to allow for the project outcomes/benefits to be sustained? Is there sufficient public/ stakeholder awareness in support of the objectives of the project? | Social, political and environmental risks identified | Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit) | Desk reviews of secondary data Interviews with government partners and development partners |

6.6. Annex 5: MTR Rating Scales

| Rat | tings for Progress Towards Results | : (one rating for each outcome and for the objective) | |
|-----|---------------------------------------|--|--|
| 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 (MU) | 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. | |
| Rat | tings for Project Implementation & | Adaptive Management: (one overall rating) | |
| 6 | Highly Satisfactory (HS) | Implementation of all seven components – management arrangements, work planning, finance and co-finance, 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 action. | |
| 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. | |
| Rat | tings for Sustainability: (one overal | l rating) | |
| 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 | |
| | - | | |

6.7. Annex 6: MTR Mission Itinerary

| Date | Time | Institution/Department |
|--|---------------|---|
| Monday | 7:00 | International consultant arrives to Hanoi |
| April 16 | 13:00-14:30 | UNDP |
| | 15:00 -17:30 | Project Management Unit Pollution Control Department (PCD), Vietnam Environment Administration (VEA) Waste Management and Environment Improvement Dept.(WENID), VEA Dept. of International Cooperation, VEA |
| Tuesday | 9:00-10:30 | Chemical Information Division International Cooperation Division |
| April 17 | | Vietnam Chemicals Agency (VINACHEMIA), MOIT |
| | 11:00-12:30 | Center for Environmental Monitoring |
| | 14:00-15:30 | Ministry of Agriculture and Rural Development (MARD) |
| | 16:00-17:30 | Environmental Management Department, Ministry of Health (MOH) |
| Wednesday April 18 | 7:00 | Fly to NgheAn (Vinh airport) |
| April 16 | 9:00 – 14:00 | DONRE of Nghe An |
| | 15:00 – 18:00 | Travel from Nghe An to Dong Hoi by car |
| Thursday April 19 | 9:00-17:00 | DONRE of Quang Binh Province |
| April 19 | 20:00 | Fly from Dong Hoi back to Hanoi |
| Friday April 20 | 10:00-11:30 | JICA office in Vietnam |
| April 20 | 15:00-17:00 | PMU/UNDP (debriefing) |
| Saturday April 21 - Sunday April 22 | | Consultants prepare for the draft report Meeting with International Consultant on treatment of contaminated sites |
| Monday April 23 | 9:00 | International consultant leaves Hanoi |

6.8. Annex 7: List of Persons Interviewed

| Name | Position | Organization | |
|---------------------|--------------------------------|---------------------|--|
| Dao Xuan Lai | Assistant to National Director | UNDP Vietnam Office | |
| Bui HoaBinh | Program Officer | UNDP Vietnam Office | |
| | Director of PCD | | |
| Le Hoai Nam | Dept. Director of PMU | VEA/MONRE | |
| Pham ThiBich Ngoc | Project Manager | PMU/VEA/MONRE | |
| | Head of Sub-Department, | | |
| Hoang Thanh Vinh | WENID | VEA/MONRE | |
| Pham ThiHuyen Trang | Official of WENID | VEA/MONRE | |
| | Technical Assistant/Project | | |
| Le Phuong Thuy | Coordinator | VINACHEMIA/MOIT | |
| Nguyen Hung Minh | Manager of Dioxin Laboratory | CEM/VEA/MONRE | |
| | Deputy Manager of Dioxin | | |
| Nguyen Thi Minh Hue | Laboratory | CEM/VEA/MONRE | |
| Huynh Tan Dat | Head of PPD | PPD/MARD | |
| LeThe Anh | Official of PPD | PPD/MARD | |
| Nguyen ThanhHai | Official of PPD | PPD/MARD | |
| | Head of Division of Chemical | | |
| | Management – Health Impact | | |
| Tran Anh Dung | Assessment | МОН | |
| DinhSyKhanh Vinh | Vice Director of EPA | DONRE NgheAn | |
| | Vice Head of Pollution Control | | |
| Tran Phuc Nguyen | Division | EPA/ DONRE NgheAn | |
| Le Thi Nga | Official of PCD | EPA/ DONRE NgheAn | |
| Cao TrungKien | Chairman of the CPC | Lam Hoa commune, QB | |
| | | EPA/ DONRE Quang | |
| Phan Xuan Hao | Director of EPA/DONRE | Binh | |
| | Head of Pollution Control | EPA/ DONRE Quang | |
| Nguyen Van Chung | Division | Binh | |
| Takahashi Makoto | Expert/Chief Advisor | JICA | |
| | Head of International | | |
| Nguyen Thi Ha | Cooperation and Convention | VINACHEMIA/MOIT | |
| Boudewijn Fokke | International Consultant | Tauw Group | |

6.9. Annex 8: List of Documents Reviewed

- 1. Viet Nam POPS and Sound Harmful Chemicals Management Project, UNDP Vietnam Project Document, 2014
- 2. Viet Nam POPS and Sound Harmful Chemicals Management Project, Inception Report, 2016
- 3. Viet Nam POPS and Sound Harmful Chemicals Management Project, GEF Tracking Tool, 2018
- 4. Viet Nam POPS and Sound Harmful Chemicals Management Project, Annual Work Plans for 2016, 2018 and 2018
- 5. Viet Nam POPS and Sound Harmful Chemicals Management Project, Annual Progress Report for 2016 and 2017
- 6. Viet Nam POPS and Sound Harmful Chemicals Management Project, Project Progress Report for Quarter 1, 2018
- 7. Viet Nam POPS and Sound Harmful Chemicals Management Project, Minutes of PSC Meetings 2017 and 2018
- 8. Decision No. 1323/QD-BTNMT dated June 14, 2016 on Establishment of Project Steering Committee for Viet Nam POPS and Sound Harmful Chemicals Management Project
- 9. Vietnam-United Nations: Harmonized Programme and Project Management Guidelines (HPPMG), Hanoi May 2010 & Revisions to the HPPMG
- 10. Decision No. 207/2005/QD-TTg dated August 18, 2005 of the Prime Minister approving the strategy on development of Vietnams chemical industry to the year 2010 (with a vision to the year 2020 taken into account)
- 11. Decision No. 1621/QD-TTg of September 18, 2013, approving the master plan on development of Vietnam's chemical industry through 2020, with a vision to 2030
- 12. Decision No. 184/2006/QD-TTg dated August 10, 2006 of the Prime Minister approving the national plan on implementation of the Stockholm convention on persistent organic pollutants
- 13. Decision No. 1598/QD-TTg dated 17 October 2017 of the Prime Minister, promulgating the National plan for implementation of the Stockholm Convention on Persistent Organic Pollutants up to 2025, with an orientation to 2030
- 14. Decision No. 1946/2010/QD-TTg of the Prime Ministry on the Plan to treat and prevent environmental pollution caused by pesticides stockpiles all over the nation
- 15. Decision No. 58/2008/QD-TTg dated April 29, 2008 of the Prime Minister on the state budgets targeted support funds for some public-utility establishments to thoroughly tackle environmental pollution and reduce environmental degradation
- 16. Decision No. 38/2011/QD-TTg to amend a number of articles of Decision No. 58/2008/QD-TTg of April 29, 2008, on the state budget's targeted support funds for some seriously polluting public-utility establishments to implement projects to thoroughly remedy pollution

- 17. Decision No.1206/2012/QD-TTg of the Prime Minister on National Target Program on pollution remedy and environmental improvement
- 18. Decree No. 127/2014/ND-CP regulating the requirements applicable to environmental monitoring service activities
- 19. Decree No. 38/2013/ND-CP dated April 23, 2013 on management and use of ODA and concessional loans
- 20. Decree No. 16/2016/ND-CP dated March 16, 2016 on management and use of official development assistance (ODA) and concessional loans granted by foreign sponsors
- 21. Guidelines for GEF Agencies in Conducting Terminal Evaluation for Full-sized Projects, GEF, April 2017
- 22. Record of Discussion on The project for Strengthening Chemicals Management in Vietnam, Agreed upon between MOIT and JICA, dated November 28th, 2014
- 23. The final Draft of the Sustainable Plan for Environmental Management of POP pesticides contaminated sites in NgheAn province, period 2018-2020, vision to 2030
- 24. Letter from UNDP to MONRE/MPI on slow implementation of PHCM project, dated February 10th, 2017
- 25. Letter from PMU/VEA/MONRE to UNDP on Requesting UNDP support to implement specific activities under Viet Nam POPS and Sound Harmful Chemicals Management Project, dated November 15th, 201

6.10. Annex 9: Audit Trail for the Mid-term Review Report

| Author | Comment Location | Comment/Feedback on the draft TE report | TE team response and actions taken |
|---------------|----------------------------------|--|---|
| PMU | Executive Summary | Assessment of quality of some deliverables from consultants | No action taken - At the time of evaluation no deliverables from the consultants were available. Although during the process of MTR report finalization some deliverables started to arrive, their assessment would prolong the MRT duration and delay the finalization of the MTR report |
| PMU | Executive Summary | Implementation rating of outcomes under Components 2 and 4 | Explanation on Outcomes 2.2 and 4.2 inserted into the text; no action taken on ratings |
| PMU | Executive Summary | Implementation rating for Outcome 3.1 | No action taken – Although few activities have started the Outcome 3.1 was supposed to be prioritized for implementation |
| UNDP | Executive Summary | List of sub-areas on project adaptive management should be in tabular format | Table with sub-areas on project adaptive management introduced in Executive Summary |
| PMU | Executive Summary | Lack of positive conclusion | No action taken – conclusions are provided only for areas where remedial/corrective actions are recommended |
| PMU | Executive Summary | Delays in implementation of components 2 and 4 | No action taken – the text makes a warning about impact of <u>further</u> delays in implementation of the two components |
| UNDP + PMU | Executive Summary | Lack of operational monitoring of co-financing | Co-financing figures were not available at the evaluation mission and were provided only after the mission upon request of the MTR Team. The co-financing information was re-calculated and text corrected accordingly |
| PMU | Executive Summary | Information on national POPs monitoring capacity contained in the Project Document | Since the PD was prepared four years ago, the MTR points out at lack of <u>updated</u> information on national POPs monitoring capacity so the text was corrected accordingly |
| UNDP + PMU | Executive Summary | Annual operational targets already contained in AWPs | Text of the recommendation corrected. The AWP should contain monitoring component in terms of status of progress to the end of project targets in order to enable operational monitoring of project progress |
| UNDP | Development Context | Information about new POPs under Stockholm Convention | Information about new POPs introduced in the text |
| UNDP | Project description and strategy | Include all barriers identified in the original ProDoc | Barriers l) and m) added to the text |
| UNDP | Finance and co-finance | Discussion of co-finance in two sections of the report | No action taken – co-finance is discussed as one of the risk factors and then in terms of actual levels of co-finance in comparison with the project inception |
| UNDP | Finance and co-finance | Revision of the section on co-financing | With the additionally provided information on actual co- financing, the relevant section of MTR has been rewritten |