**Kingdom of Cambodia**

***Environmental Governance Reform Project (EGR)***

**UNDP Project ID 00095386**

**FINAL EVALUATION REPORT**

4 August 2019

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|  | **Kingdom of Cambodia** |  |

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Prepared by:

**Steve Raaymakers**

Final Evaluation Consultant - EcoStrategic Consultants

[www.eco-strategic.com](http://www.eco-strategic.com)

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|  | **Government of Japan** | *UNEP Logo* |  |  |

**PROJECT DATA:**

|  |  |
| --- | --- |
| **Project Title:** | ***Environmental Governance Reform for Sustainable Development (EGR Project)*** |
| **UNDP Project ID:** | 00095386 |
| **UNDP Atlas Award ID:** |  |
| **Country:** | Kingdom of Cambodia |
| **Region:** | Asia Pacific  |
| **UNDP Practice Area:** | Environment & Energy |
| **UNDAF/CPD Outcome:** | Outcome 1: By 2018, people living in Cambodia, in particular youth, women and vulnerable groups, are enabled to actively participate in and benefit equitably from growth and development that is sustainable and does not compromise the well-being, natural and cultural resources of future generations. |
| **UNDAF/CPD Output:**  | Output 1.1: Establishment and strengthening institutions, coordination mechanism and policies for sustainable management of natural resources, ecosystem. |
| **Implementing Partner:** | UNDP Cambodia Country Office |
| **National Partners:** | Royal Government of Cambodia (RGC):* Ministry of Environment (MoE)
* National Council for Sustainable Development (NCSD)
 |
| **Financing:** | At endorsement (USD) | *At completion (USD)* |
| USAID:  | $2,500,000  | *(+$1M provided to extend project) $3,500,000* |
| Government of Japan: | $300,000  | *$300,000*  |
| UN Environment: | $77,760  | $97,760  |
| In-Kind: | $402,000  | $402,000 |
| **Total Project Cost:** | **$3,279,760**  | **4,299,760** |
| **Planned start date (in ProDoc):** | 1 Jan 2016 |
| **Actual start date:** | June 2016 |
| **Planned end date (in ProDoc):** | 31 May 2018 |
| **1st extension:** | To April 2019 |
| **2nd extension (final end date):** | End August 2019 |
| **Mid Term Review (MTR) date:** | No MTR was undertaken |
| **Final Evaluation (FE) date:** | June – July 2019 |

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* Ms. Sereyvattana Chan, Procurement Officer, UNDP Cambodia.
* All stakeholders who gave their time for consultations meetings and interviews, as listed in Annex 2.

# ACRONYMS USED

APR Annual Project Report

AQPR Annual Quality Project Rating

AWP Annual Work Plan

CELN Cambodia Environmental Law Network

CPD Country Programme Document (of UNDAF)

CPIA Country Policy Institutional Assessment (World Bank)

CSDG Cambodian Sustainable Development Goals

EGR Environmental Governance Reform Project (subject of this FE report)

FE Final Evaluation (this report)

FEC Final Evaluation Consultant (author of this FE report)

GDP Gross Domestic Product

GNI Gross National Income

HR Human Resources

JICA Japan International Cooperation Agency

KD Key Deliverable

KFR Key Finding & Recommendation

LFA Logical Framework Analysis

LoA Letter of Agreement

MoE Ministry of Environment

M&E Monitoring and evaluation

MTR Mid Term Review

NCSD National Council for Sustainable Development

NRM Natural Resource Management

ProDoc Project Document

PIR Project Implementation Review

PMU (EGR) Project Management Unit (engaged by UNDP)

PPP Public-Private Partnership

PRF Project Results & Resources Framework (as contained in the ProDoc)

QPR Quarterly Progress Report

RGC Royal Government of Cambodia

SDG (UN) Sustainable Development Goals

ToR Terms of Reference

UN United Nations

UNDAF United Nations Development Assistance Framework

UNDP United Nations Development Programme

UNE United Nations Environment

UNEG United Nations Evaluation Group

USAID United States Agency for International Development

# EVALUATION LIMITATIONS

1. While the Final Evaluation (FE) of the Cambodia EGR Project used best-practice evaluation methods and included desk-top review of a comprehensive set of documents and a week of consultation meetings with key stakeholders in Phnom Penh, the FE was subject to a number of non-trivial limitations, as follows:
2. Lack of cross-sectorial inputs: Given the strategic political significance of the EGR Project and its major focus on enhancing inter-ministerial and cross-sectorial coordination and cooperation on environment and natural resource management issues, it was essential that the FE process included consultation meetings not only with MoE and NCSD, but also with other key national and provincial government ministries and agencies that are of high relevance to the Project.

However, despite requests from the Final Evaluation Consultant (FEC) to UNDP starting well before the country visit, and followed up during the country visit, other than MoE and NCSD no consultation meetings were organized with any other relevant national or provincial government ministries and agencies. Such a lack-of cross-sectorial consultation during an FE is unprecedented in the FEC’s experience with a wide range of evaluations, and raises questions on this issue.

1. Limited Project Manager inputs: By the time of the FE the Project Management Unit (PMU) had been disbanded and the FEC was only able to interview one of the three previous Project Managers remotely by Skype (the initial Project Manager Adam Starr). Attempts were made to interview the other two but with no success. Given the central role that the Project Managers played in the Project, their lack of inputs to the FE is a significant gap.
2. Limited donor inputs: While a meeting was able to be held with a relevant USAID representative (the main donor to the Project), despite attempts no representatives from the other two EGR donors (Government of Japan and UN Environment) were available for interview – either directly or remotely. This relates in part to the fact that donor inputs from Japan ended in December 2017 and from UN Environment in early 2108, and relevant staff have also moved on.
3. Lack of physical verification: The FE process did not include site visits or physical verification of Project technical outputs (e.g. installation of waste incinerator at Mount Kulen, installation of air quality sensors in Phnom Penh), and reports of their installation and ongoing operation are accepted at face value. This is a risk as demonstrated by the NCSD corridor branding activity, funded by the Project to the tune of US$3K. The May 2019 UNDP Pre-final Project Report states that this was completed in April 2019, yet at FE in June it had not actually been implemented.

This one example clearly raises questions about the veracity of all other reporting of Project achievements, and there may well be other examples – which raises question about where funds might have gone if activities have not actually been implemented. In the FEC’s experience it is highly unusual for project evaluations to not include at least some site visits and physical verification of technical outputs. It is recommended that UNDP should follow up on this.

1. Acceptance of financial data: In accordance with UNDP evaluation guidelines the FE includes an overall assessment of the financial aspects of the Project. However the FEC is not an accountant or financial auditor and no attempt at all has been made by the FEC to verify the Project financial data provided by UNDP – these data are accepted at face value.
2. The findings of this FE report should be considered *in light of these limitations*.

# EXECUTIVE SUMMARY

## ES 1. Overall Summary Finding

1. The Cambodia EGR Project is assessed to be one of the most relevant projects that the Final Evaluation Consultant (FEC) has evaluated, in that it responds directly to a major national reform agenda as already formulated and initiated by the Minister for Environment. The Project was driven by the needs and priorities of the beneficiary country, rather than imposed by the development partners (demand- not supply-driven). In this regard it provides a best practice model for the design of other development projects.
2. The technical components of the Project are assessed to be well conceived and designed based on best practices in the relevant areas of focus. However, the project design is found to be overly ambitious relative to limited timeframe and budget. A much larger and longer, phased design would have been more appropriate given the highly strategic, ambitious and complex nature of the EGR agenda.
3. Despite major staff, time and budget constraints, the Project was still able to deliver a wide range of often high-quality activities and outputs across all four Project components, in support of the overall strategic objective of supporting the RGC’s EGR agenda. This is a major credit to all parties involved.
4. Despite the high rate of achievement, many of the most important outputs remain to be finalized and fully implemented by MoE and NCSD, including *inter alia:*
5. finalization, adoption, enactment and implementation of the Environment Code,
6. operationalization of the integrated ecosystem mapping decision support system; and
7. operationalization of the new human resources and related management systems at MoE.
8. Given that those outputs of the Project that are designed to have the most significant impact are yet to be finalized and implemented – especially the Environment Code – it is too early to measure any significant impact. This needs to be assessed in future years once all Project outputs are fully implemented and operationalized.
9. If the Code is actually finalized and operationalized, it is likely to have an extremely significant, positive impact, and move Cambodia towards being a leader in best practice environment protection, natural resource management and sustainable development.
10. If the Code is not finalized and operationalized, then the overall impact of the EGR Project is likely to be minimal, and much of the Project investment will have been wasted. This highlights the need for an EGR Project Phase 2, as outlined in section 4.5.5.
11. An annual financial audit was conducted in January 2018 covering the period January to December 2017, and a “spot check” audit was carried out in December 2018, covering the period January to September 2018, following UNDP Financial Rules. Given a major surge in expenditure since September 2018 it is recommended that a detailed financial audit be undertaken for the whole Project after financial closure.

## ES 2. Key Findings & Recommendations

For the sake of efficiency, only five high priority key findings with linked recommendations are presented. More details on wider issues can be found in the report body.

| **Key Findings** | **Recommendations** |
| --- | --- |
| **1. Project design & relevance:**1. The EGR Project is assessed to be one of the most relevant projects that the Final Evaluation Consultant (FEC) has evaluated, in that it responds directly to a major national reform agenda as already formulated and initiated by the Minister for Environment. As such the Project was driven by the needs and priorities of the beneficiary country rather than imposed by the development partners (demand- not supply-driven). The Project also fits well with the United National Development Assistance Framework (UNDAF) for Cambodia, UN SDGs and USAID development objectives.
2. During project design the beneficiary Ministry was able to work closely with UNDP, USAID, the Government of Japan and other partners and their project design consultants, to strongly determine the objectives, focus and design of the Project in accordance with its EGR agenda. The technical components of the Project are assessed to be were well conceived and designed based on best practices in the relevant areas of focus.
3. However, the project design is found to be overly ambitious relative to limited time-frame (initially only two years and extended to three years and two months) and limited budget (initially only US$2.9 million cash grants with an additional $1 million provided later by USAID). The project design also only allowed for a very small, two-person Project Management Unit (PMU) (a Project Manager and Project Assistant only).
4. Given these constraints, the high rates of achievement of the Project are assessed to be outstanding, and a major credit to all parties involved.
5. The FEC assesses that given the high-level strategic significance of the EGR agenda, the revolutionary impact once fully implemented, and the wide scope and complexity of the Project’s four components, a more appropriate project design would have allowed for:
* a minimum budget of $20 million in grant support with at least four times in-kind support from partners,
* a time frame of 10 years divided into a five year development phase and a five year implementation phase; and
* an expanded PMU with three Technical Managers under the Project Manager, one for components 1 and 2 (MoE and NCSD institutional strengthening), one for component 3 on the legal code and one for component 4 on integrated ecosystem mapping and data management.
1. The position classification of the Project Manager (UN P3) is also assessed to be too junior relative to the highly ambitious scope and complexity of the Project, the strategic political significance of the Project and the extremely senior level of engagement required with RGC officials (up to Secretary of State and even Minister). Ideally the project design (and budget) should have allowed for a P4 or even P5 classification.
2. The Project design also suffered from some weaknesses in the Project Results Framework (PRF) and M&E plan (refer section 4.3).
 | **1. Project design & relevance:*** Recommendation 1.1: It is recommended that the outstanding responsiveness of the EGR Project to directly meeting the defined needs and priorities of the beneficiary country should be adopted as a best practice model for the design of other projects (development projects tend to have greater beneficial impact when they are demand- rather than supply-driven).
* Recommendation 1.2: It is recommended that the design of future projects should give more careful consideration to ensuring that the level of resourcing and implementation timeframe are better aligned with the objectives and scope of the project.
* Recommendation 1.3: It is recommended that the design of future projects should give more careful consideration to ensuring a strong, clear and well articulated PRF and M&E plan, as these provide powerful tools for managing and monitoring project implementation (refer section 4.3).
 |
| **2. Project implementation & adaptive management:**1. Overall the Project implementation arrangements and performance are assessed to be satisfactory, as exemplified by:
* Effective use of the Project Board, which enabled a high level of influence by MoE and NCSD over project implementation.
* A very high rate of delivery of activities and outputs relative to staff, time and budget constraints (a high *delivery to resources ratio* = efficient).
* Strong utilization of support from a wide range of partners – including UNE experts, experts from US Government Agencies other than USAID -through the US Department of Interior International Assistance Program and others.
* Efficient and timely UNDP procurement and disbursement processes - as reported by stakeholders - although delays in some cases.
1. The Project players and partners also exhibited an outstanding capacity for adaptive management in response to changing circumstances, which is critical to the success of any project, including:
* Empowerment of the Project Board with discretion to steer the Project in response to changing circumstances, needs and priorities.
* A very rapid response by USAID to an identified need for additional funds to allow more substantive Project completion, with rapid approval of an additional US$1 million in funding to allow seamless continuity into an initial one year extension.
* Flexibility and commitment within UNDP to allocate core staff to the project management role during gaps in having a dedicated Project Manager (although such gaps should have been avoided in the first place – see Key Finding 4 below).
 | **2. Project implementation & adaptive management:*** No specific recommendations – however refer Recommendation 1.2 above.
 |
| **3. Project successes & achievements:**1. There were 15 end-of-project Targets in the ProDoc PRF. As presented in the Table A in section ES3, the Target achievement rate was:
* Total Targets: **15**
* Targets Exceeded: **2** (13.3%) / Targets Achieved: **6** (40%) / Targets Partially Achieved: **5** (33.3%) / Targets Not Achieved: **2** (13.3%).
1. There were also 31 Activities in the ProDoc PRF. As presented in the Table B in section ES3, the Activity delivery rate was:
* Total Activities: **31**
* Activities Exceeded: **1** (3.2%) / Activities Delivered: **19** (61.3%) / Activities Partially Delivered: **8** (25.8%) / Activities Not Delivered: **3** (9.7%).
1. This may be considered a high project achievement rate considering the relatively significant constraints on available staff, time and budget. Overall the EGR Project delivered a wide range of often high-quality activities and outputs across all four Project components, in support of the overall strategic objective of supporting the RGC’s EGR agenda.
2. Despite the high rate of achievement, many of the most important outputs that have been delivered by the Project remain to be finalized and fully implemented by MoE and NCSD, including *inter alia* finalization, adoption, enactment and implementation of the Environment Code, operationalization of the integrated ecosystem mapping decision support system and operationalization of the new human resources and related management systems at MoE. Without full implementation and operationalization of these and other key Project deliverables, much of the Project investment may be wasted.
 | **3. Project successes & achievements:*** Recommendation 3.1: It is recommended that MoE and NCSD should give high priority and to finalizing and fully implementing all key outputs that have been delivered by the Project but which have not yet been finalized, especially the Environment Code, HR plan and systems, and integrated ecosystem mapping.
* Recommendation 3.2: It is recommended that UNDP, USAID and other development partners should support RGC as far as practicable in implementing Recommendation 3.1.
 |
| **4. Project areas for improvement:**1. Despite the overall success of the Project, as with any project there are always areas where things could have been done better and where lessons can be learned for the benefit of future projects, and identifying and reporting on these is a core reason for undertaking project evaluations. Some of the main areas for improvement / lessons learned in relation to the EGR Project as identified by this FE are listed below. There are also others but for the sake of report efficiency only the most significant are summarized here.
2. The project design should have provided a staff structure, budget and timeframe that were better aligned (i.e. bigger and longer) with the extremely ambitious objectives, broad scope and complex nature of the EGR reform agenda, as outlined in Key Findings 1.5 to 1.7.
3. There was an unacceptable six-month delay to Project start and an unacceptably high turnover of Project Managers (three in just two years), and significant gaps without a dedicated Project Manager. During these gaps core UNDP staff who may not be experienced in complex project management had to assume the project management function. This resulted in significant lulls and surges in implementation activity – with a marked “rush” of activity in the last year of the Project (see recommendation 4.1).
4. There are non-trivial questions about the use of a single-supplier private law firm to develop the Environment Code under a $750K contract equating to ~20% of total Project budget. Senior personnel reported that they felt that the contract for this major piece of work did not have adequate performance-based delivery, transparency and accountability checks and controls, reportedly making it difficult for UNDP to exercise sufficient control and oversight of the contractor’s performance (see recommendation 4.2). A more ideal approach might have been to develop the Code through a well-resourced, MoE-led inter-ministerial working group, supported by experts.
5. While there are definitely lessons to be learned from this major component of the Project, the FEC has formed the view that at the strategic level, given the major positive impact of the Code if it is actually implemented, and considering the extremely short Project time-frame, , use of a private law firm to coordinate drafting of the bulk of the Code in such a short time probably represents good value for money. Without this approach it is unlikely that the Code would have been delivered in as advanced a state of completeness as it was.
6. There are also some questions about the technical quality, relevance and appropriateness of some sections of the Code, including in some cases consistency with relevant international conventions and treaties to which Cambodia is a party (refer Annex 6). Although the Code was drafted by a group of more than 10 experts with inputs from technical working groups involving more than 15 line ministries as well as civil society, some of the stakeholders involved reported that it was also heavily influenced by US expertise based on the US approach to environmental law. While US environmental law is of-course very advanced and embraces (and indeed sets) best practice – it is not always consistent with the international regime, or always appropriate to a developing country context. Hopefully these issues will be addressed as the Code is finalized.
 | **4. Project areas for improvement:*** Recommendation 4.1: It is recommended that for future projects, in order to prevent loss of implementation continuity through high turnover of key staff like the Project Manager, as occurred with the EGR Project, UNDP should provide greater security of employment for these positions. The simplest reform would be to issue employment contracts that run for the full duration of the Project rather than the current, insecure year-by-year contracts. Performance criteria can easily be included to allow non-performing staff to be terminated if necessary. The position classification should also be appropriate to the significance of the project, in order to attract and retain the right candidates (see Key Finding 1.7).
* Recommendation 4.2: It is recommended that for future projects, when large private firms are engaged to implement major project components for relatively large fees, as was done under the EGR Project to develop the Environment Code, UNDP should ensure that contracting processes include stringent performance-based delivery, transparency and accountability checks and controls.
* Recommendation 4.3: It is recommended that in finalizing the Environment Code, MoE should consider the issues identified in Annex 6 of this report.
 |
| **5. Long term sustainability & need for Phase 2:**1. As outlined in Key Finding 3 the EGR Project has delivered a wide range of often high-quality activities and outputs across all four Project components, in support of the RGC’s overall strategic EGR objectives. However, as also outlined in Key Finding 3, many of the most important outputs that have been delivered by the Project remain to be finalized and fully implemented by MoE and NCSD, including *inter alia* the Environment Code, the integrated ecosystem mapping decision support system and the new human resources and related management systems. In order to ensure that Project investments to date have the intended beneficial impact, it is necessary that additional resources be provided post-Project to enable the much-needed finalization and operationalization.
2. It appears that MoE and NCSD are very actively seeking such resources, including from their own budgets and direct approaches to various development partners. It was reported that MoE intends to utilize resources from the new, US$50 million World Bank-GEF *Cambodia Sustainable Landscape and Eco-tourism Project* to support further development and operationalization of the ecosystem mapping decision support system and data portal. It was also reported that several applications were submitted to the Japan International Cooperation Agency (JICA) in July this year for various projects that will support the EGR agenda. The US Department of Interior reported that it intends to continue providing training and capacity building on various subjects, including relating to the Environment Code, through its International Assistance Program.
3. However, there is a risk that in the absence of the EGR Project post-August 2019, these various initiatives may become disjointed and uncoordinated. The impact multiplier benefits that can accrue from integrating such investments into a strategic, coordinated, programmatic approach, as was provided by the EGR Project, will be lost. This could pose a risk to the sustainability of benefits from the EGR investments to date.
4. There is a clear need for an EGR Project Phase 2 – with a focus on finalizing and fully implementing the major outputs delivered by Phase 1 - including *inter alia* the Environment Code, the integrated ecosystem mapping decision support system and the new human resources and related management systems.
 | **5. Long term sustainability & need for Phase 2:*** Recommendation 5.1: It is recommended that in order not lose the benefits from EGR investments to date, as a matter of high priority UNDP should start working with MoE, NCSD and potential partners to start designing and resourcing an EGR Project Phase 2.
* Recommendation 5.2: Phase 2 should focus on implementing the major outputs of Phase 1 - especially the Environment Code.
* Recommendation 5.3: The Phase 2 Project should incorporate lessons learned from Phase 1 – including from this FE report.
* Recommendation 5.4: The Phase 2 Project could seek novel and innovative financing modalities, for example:
	+ Partnering between UNDP, MoE, NCSD and infrastructure developers and financiers to demonstrate best practice EIA for major infrastructure such as the Phnom Penh – Sihanoukville expressway.
	+ Partnering between UNDP, MoE, NCSD and the new “Green Belt & Road Initiative” to demonstrate best practice environment and social safeguards and green design in major projects.
	+ Establishing Public-Private Partnerships (PPP) to implement viable waste management solutions in priority areas (UNDP has established PPP models).
 |

## ES 3. Project Achievements & Delivery Summary

TABLE A: *Achievements Summary* *for Project Targets* (based on the PRF in the ProDoc)

* Total Targets: **15**
* Targets Exceeded: **2** (13.3%)
* Targets Fully Achieved: **6** (40.0%)
* Targets Partially Achieved: **5** (33.3%)
* Targets Not Achieved: **2** (13.3%)

| **Key Deliverable (KD) / Output** | **Indicator** | **End of Project Targets**(Target numbers added for this Table – in PRF not numbered) | **Status at TE** (June 2019) | **FE Notes** |
| --- | --- | --- | --- | --- |
| **KD / Output 1**: New structure of MoE operationalized:   | **Indicator 1.1:** Number of subsidiary legislations (sub-decrees, royal decrees, amendments) related to support the MoE new structure and functions to strengthen environmental management. | Minimum 3 new subsidiary legislations inc:  |  |  |
| Target 1.1.1: Amendments to law to redefine MoE including EIA role: | **Partially Achieved** | * Part of Environment Code.
* At FE the Code was still in Draft form (Draft 11) with significant work still to be done to incorporate views and positions of all relevant ministries and finalize the text ready for submission to the official government adoption and enactment process.
* MoE says aiming to achieve this by end 2019 calendar year – although there appear to be non-trivial risks to achieving this – mainly securing full buy-in from other Ministries – some of whom are proceeding with their own new environment and NRM laws despite the Code.
 |
| Target 1.1.2: Sub-decrees (prakas) on new MoE departments: | **Achieved** | * MoE restructure is mandated by new ‘prakas’.
 |
| Target 1.1.3: Final version of EIA law: | **Partially Achieved** | As per 1.1.1 above. |
| **Indicator 1.2:** Extent to which the institutional capacity of the MoE is enhanced to address environmental issues: | Target 1.2.1: Strategic action planning with budget planning: | **Achieved** | * Project has successfully supported MoE to develop a range of strategic action plans with budgets.
 |
| Target 1.2.3: Human resources plan in place: | **Achieved** | * Project has successfully supported MoE to develop HR plan, systems and procedures.
* MoE still needs to fully operationalize the HR plan, systems and procedures developed with Project support.
 |
| Target 1.2.4: Communications plan in place: | **Achieved** | * Project has supported MoE with comms plan and activities.
 |
| Target 1.2.5: Procedures for funds management:  | **Not Achieved** | * FEC has not seen any evidence that MoE funds management procedures have been reformed as a result of EGR Project support.
 |
| Target 1.2.6: At least two quick-win projects being formulated: | **Exceeded** | * 6 Quick Win projects fully implemented – in excess of the target of 2..
 |
| **KD / Output 2**: New NCSD organizational structure and authorities operationalized:   | **Indicator 2.1:** Number of institutions with improved capacity to address climate change issues: | Target 2.1.1: Minimum of 3 institutions: | **Not Achieved** | * FEC has not seen any evidence that even one institution has improved capacity to address climate change issues as a result of EGR Project support.
* This is a Project design problem in that the relevance and utility of Indicator 2.1 to the strategic Output 2 is not clear.
* More broadly climate change is addressed by a range of other Projects in Cambodia, including UNDP CCA and ADB – it is duplication to try and include it in the EGR Project.
* Additionally the EGR Project is supposed to promote high-level, strategic, cross-sectoral national reforms, not focus on specific sectors or issues like climate change.
 |
| **Indicator 2.2:** Extent to which the institutional capacity of the NCSD is enhanced in formulating, directing and evaluating policies, strategic plans, action plans, legal instruments, programmes for sustainable development: | Target 2.2.1: Strategic action planning with budget planning: | **Achieved** | * Project has successfully supported NCSD to develop a range of strategic action plans with budgets .
 |
| Target 2.2.2: No. of Council meetings: | **Achieved** | * Two NCSD meetings have been held June 2016 to June 2019..
* Note that “Number of Council meetings” is not a proper target – it is open ended. A target would be “X Council meetings held”
 |
| Target 2.2.3: Number of legal instruments developed: | **Partially Achieved** | * As per 1.1.1 above.
* “Number of legal instruments developed” is not a proper target – it is open ended. A target would be “X legal instruments developed.”
 |
| **KD / Output 3**: New Environmental Code (EC) drafted:  | **Indicator 3.1:** Number of laws or regulations addressing biodiversity conservation officially proposed, adopted or implemented: | Target 3.1.1: Minimum 2 (Environmental Code, EIA law): | **Partially Achieved** | * As per 1.1.1 above.
 |
| **Indicator 3.2:** Number of public consultations organized for the development of Environmental Code: | Target 3.2.1: At least 3 public consultation workshops and outreach activities involving local communities: | **Exceeded** | * Five public consultation workshops were held involving local communities.
 |
| **KD / Output 4**: Integrated Ecosystem Mapping developed and operationalized:   | **Indicator 4.1:** Extent to which ecosystems maps are integrated at the national level to show the status of forest, lands, water, biodiversity, critical ecosystems: | Target 4.1.1: Integrated ecosystem mapping developed and operationalized for national land use decisions: | **Partially Achieved** | * The EGR Project has delivered a number of significant elements of this Output including inter alia the Kulen Protected Areas Management Plan.
* However, the fully integrated ecosystem mapping system, decision support system and data portal still need to be operationalized by MoE.
 |

TABLE B: *Delivery Summary* *for Project Activities* (based on the PRF in the ProDoc)

* Total Activities: **31**
* Activities Exceeded: **1** ( 3.2 %)
* Activities Fully Delivered: **19** (61.3 %)
* Activities Partially Delivered: **8** (25.8 %)
* Activities Not Delivered: **3** ( 9.7 %)

| **Key Deliverable / Output** | **Activities (as listed in PRF)** | **Status at TE** (June 2019) | **FE Notes** |
| --- | --- | --- | --- |
| **KD / Output 1**: New structure of MoE operationalized: | **Strategies and action plans with the focus on priority areas:**  |  |  |
| 1. Refine the strategic framework and promote it throughout MoE.
 | Delivered | Foundational starting point for the Project. |
| 1. Develop action plans for MOE strategic Priorities (2016-2023).
 | Delivered | Remains up to MoE to implement. |
| 1. Communicate MoE priorities across government and to stakeholders.
 | Delivered | Part of Activity 5 - MoE needs to implement. |
| **Capacity building of the ministry and departments:**  |  |  |
| 1. Support the senior management team.
 | Delivered | Range of training and capacity building provided. |
| 1. Develop communication plan.
 | Delivered | Remains up to MoE to implement. |
| 1. Develop human resources plan.
 | Delivered | Remains up to MoE to implement. |
| 1. Support working group on development cooperation, planning and budgeting.
 | Not delivered | FEC could not identify Project support for this. |
| 1. Management of potential revenues and funds.
 | Not delivered | FEC could not identify Project support for this. |
| **Planning and supporting for the quick wins:**  |  |  |
| 1. Identify quick win projects including the areas of PA management, waste management, climate resilience, sustainable cities, EIAs.
 | Delivered | Question why EIA not included – should be priority. |
| 1. Implement quick win activities.
 | Exceeded | PRF target is 2 QWs - 6 were implanted.  |
| 1. Document status and next steps for quick-win projects.
 | Not delivered | No physical verification of some QWs. Some incorrect reporting as ‘implemented’ (e.g. NCSD corridor branding). No ‘next step’ plans. |
| **KD / Output 2**: New NCSD organizational structure and authorities operationalized: | **NCSD strategies and action plans:** |  |  |
| 1. Develop an overall strategy and action plan for making the NCSD effective.
 | Delivered | Remains up to NCSD to implement. |
| 1. Develop action plans for NCSD (2016-2023).
 | Delivered | Remains up to NCSD to implement. |
| 1. Communicate priorities across Government and to Stakeholders.
 | Delivered | Part of Activity 1.5 - NCSD needs to implement. |
| **Capacity building of NCSD and departments:** |  |  |
| 1. Strengthen NCSD and Secretariat.
 | Delivered | All of Output 2 feeds to this. |
| 1. Strengthen General Secretariat Departments (1. Admin, Planning and Finance, 2. Climate Change, 3. Green Economy, 4. Science and Technology and 5. Biodiversity).
 | Delivered | All of Output 2 feeds to this. |
| 1. Strengthen capacity of member agencies.
 | Partially Delivered | Some member agency reps participated in Project training and workshops but insufficient to constitute meaningful capacity strengthening. |
| 1. Develop resource mobilization strategy.
 | Partially Delivered | Project did not develop strategy for NCSD overall.Project did support resource mobilization strategy for Kulen protected areas. |
| **KD / Output 3**: New Environmental Code (EC) drafted: | **Creating overarching Principles:**  |  |  |
| 1. Establishment of secretariat, STWGs, and inter-ministerial working group.
 | Delivered | Secretariat and 6 STWGs established and effectively fed into compilation work of private law firm to develop Code. |
| 1. Initial analysis of existing policies, laws and regulations and relevant international experience to identify best principles and standards for environmental management.
 | Delivered | This was a key foundational activity for Code development. |
| 1. Analysis of existing policies, laws and regulations to identify overlaps among relevant ministries, and recommendations for improved management arrangements across government.
 | Delivered | This was a key foundational activity for Code development. |
| 1. Development of general principles and objectives for the Code.
 | Delivered | This was a key foundational activity for Code development. |
| **Development of proposals for statutory changes and implementation framework:** |  |  |
| 1. Identification, research and formulation of innovative tools and mechanisms such as enforcement of citizen rights, green tax policy etc.
 | Delivered | This was a key foundational activity for Code development. |
| 1. Development of an initial Code, including proposals for statutory changes and creation of new laws, such as EIA.
 | Partially Delivered | EIA law should be an extremely high priority in Cambodia however subsumed into the Code causing delays. |
| 1. Public consultation workshops to present and receive comments on the draft Code.
 | Delivered | Range of consultation workshops held. |
| **Final drafting of the Code:** |  |  |
| 1. Compilation of all components into a unified Code structure.
 | Partially Delivered | Code was at Draft 11 at time of FE – however still not complete with significant work still to be done to finalize text, including addressing concerns of other ministries. |
| 1. Support to the Ministry during the government and National Assembly approval processes.
 | Partially Delivered | Government and National Assembly approval processes will not start until after Project closure however Project provided tools to assist process. |
| 1. Detailed work plan for public outreach, capacity building, pilot programming and other steps to promote effective implementation of the Code.
 | Partially Delivered | No detailed work plan developed however Project did support individual outreach activities. |
| **KD / Output 4**: Integrated Ecosystem Mapping developed and operationalized: | 1. Consolidation of existing of spatial data on ecosystems, biodiversity, rural livelihoods, development activities and energy.
 | Partially Delivered | Significant work on this. 200 GIS layers compiled. However some obstacles/ issues not resolved (e.g. unwillingness of some Govt agencies to share data, arguments about cloud vs in-house server data storage etc). MoE still needs to fully operationalize the data management system and portal. |
| 1. Designing and establishment of a Decision Support System (DSS) for land use planning.
 | Partially Delivered | DSS designed but remains to be operationalized. |
| 1. Capacity building of MoE and NCSD for data management in regularly collecting, updating and managing environment and development data.
 | Delivered | Wide range of training and capacity building provided by the Project in this area. However some concerns about some of the training (e.g. MoE uses ArcGIS while Project provided training in open-source QGIS which MoE does not use). |

## ES 5. Evaluation Ratings

TABLE C: *Final Evaluation ratings for the Cambodia EGR Project*

| **Project Element** | **Evaluation Rating** | **Reasons for Rating** |
| --- | --- | --- |
| **1. Relevance:** | * Highly Relevant

(would allocate “Extremely Relevant” except this category not available in the Ratings Scale) | Refer section 4.5.1 of this report.* One of the most relevant projects that the FEC has evaluated.
* Project responds directly to a major national reform agenda - Demand not supply driven.
* Beneficiary Ministry was able to strongly determine the objectives, focus and design of the Project in accordance with their own development agenda.
* The EGR Project has responded directly to a major national need and priority provides a best-practice MODEL for other development projects to follow.
* Also fits with UNDAF and USAID development objectives, as well as UN-SDGs and Cambodian SDGs.
 |
| **2. Project Design:** | * Moderately Satisfactory.
 | Refer section 4.2 & 4.3 of this report.* Technical components of the Project were very well conceived and designed based on best practice, in direct response to country needs and priorities (as per ‘Relevance’ above).
* However, Project Design did not provide for adequate budget, timeframe and staffing.
* Some deficiencies with Project Results Framework (confusion about Impacts, Outcomes, Outputs, Indicators etc).
* Weak Monitoring & Evaluation Plan (see next item below)
 |
| **3. M&E**  | * Moderately Unsatisfactory.
 | Refer section 4.3 of this report. Deficiencies with PRF and M&E design. Poor use of PRF as M&E tool. Focus on reporting lists of activities and outputs rather than assessing outcomes and impacts. Some incorrect reporting of activity completion. No physical verification of activity delivery. No Mid Term Review. |
| **4. Effectiveness:** | * Highly Satisfactory in delivering Activities & Outputs.
 | Refer section 4.5.2 of this report.* Very impressive achievements given the extremely ambitious Project objectives, the broad range and complexity of Project components, the relatively limited timeframe (3 yrs and 2 months) and the limited budget ($3.9 million).
* Despite constraints the Project has been highly effective in delivering a wide range of often high-quality Activities and Outputs.
* Project has exhibited *impressive ability* for adaptive management.

However:* Some questions about the technical quality of some sections of the Code, including consistency with relevant international conventions and treaties.
* The relevance and effectiveness of some of the “Quick Win” actions are questionable relative to the strategic objectives of the overall Project.
* Some key elements still not fully implemented with only weeks to Project end (e.g. CELN and NCSD corridor branding).
 |
| * Moderately Satisfactory in delivering Outcomes and Impacts.
 | Refer section 4.5.2 of this report.* Insufficient time and resources.
* Effectiveness of the Project in delivering Outcomes and Impacts should be assessed in coming years, when there has been sufficient time for the benefits of Project interventions to begin to manifest.
 |
| **5. Efficiency:** | * Satisfactory.
 | Refer section 4.5.3 of this report.* Very high rate of delivery of Activities and Outputs relative to significant staff, time and budget constraints (high *delivery to resources ratio* = efficient).
* Strong utilization of commitment and support from a wide range of partners – including UNE, US Government Agencies and others.
* Stakeholders reported satisfactory UNDP procurement and disbursement processes – although delays in some cases.

However:* Six month delay to Project start and PM / PA recruitment.
* High turnover of PM (x3 in 2 years) and gaps with no PM.
* Lulls and surges in implementation activity.
 |
| **6. Execution & management:** | * Satisfactory.
 | Refer section 4.4 of this report.* Apart from above, UNDP procedures ran well.
* Project Board very effective.
* Good adaptive management.
* Some questions about some implementation modalities (e.g. use of single-supplier private law firm to develop the Environment Code under a circa $1M contract equating to ~25% of total Project budget).
 |
| **7. Impact:** | * At this stage Minimal impact.
 | Refer section 4.5.4 of this report.* Simply too early to tell.
 |
| * If Project Outputs including Code are fully operationalized, will be Extremely Significant impact.

(**Cambodia will be a leader!)** | Refer section 4.5.4 of this report.* Need to assess in future once all Project Outputs are fully implemented and operationalized.
 |
| **8. Sustainability:** | * Likely (with qualification)
 | Refer section 4.6 of this report.* MoE is actively developing and implementing measures to ensure sustainability, which bodes well for sustainability.
* However several major components including Environment Code remain to be finalized and implemented.
* Main risk is barriers to inter-ministerial / cross-sectoral coordination.
 |
| **9. OVERALL PROJECT RATING:** | * **SATISFACTORY**
 | * Considering all above combined.
 |

# 1. INTRODUCTION

## 1.1 Background & context

1. Cambodia is rapidly transiting towards a lower middle-income country. The Gross National Income (GNI) per capita is USD 1,020 (World Bank 2014) with an annual Gross Domestic Product (GDP) growth of 7.4 percent (World Bank 2013). However, Cambodia is ranked 145 out of 178 countries for the Environmental Performance Index with the overall score of 35.44 out of 100 points (Yale Center for Environmental Law and Policy, 2014). The World Bank’s Country Policy Institutional Assessment (CPIA) (2014) gives the country a score of 3 out of 6 for policy and institutional capacities in environmental sustainability.
2. Like other rapidly developing countries, Cambodia thus faces challenges in terms of attaining sustainable development. In September in 2015, Cambodia endorsed the adoption of Sustainable Development Goals (SDGs) to meet these challenges. Currently, Cambodia is in a process of specifying the SDG goals in the context of the challenges pertaining to Cambodian sustainable development.
3. At present, Cambodia has several governmental bodies and laws to govern its natural resources and the environment. The Ministry of Environment (MoE) has a central mandate for environment and conservation issues. In recent years, however, the MoE has faced significant constraints in addressing the emerging environmental challenges due partly to its rigid organizational structure, strategic priorities and implementation plans, and partly to insufficient human and technical resources.
4. Moreover, there was limited inter-ministerial coordination and legal framework that provide overarching guidance and direction for sustainable development. Additionally, the mandates and regulations of existing ministries could correspond to some extend to current and emerging challenges. Finally, overlapping jurisdictions and mandates among line ministries prevents a more effective governance of natural resources and environment. This has resulted in uneven and inadequate enforcement and application of environmental and natural resource requirements and standards, thus constraining efforts to protect the environment and facilitate sustainable development.
5. In response to these challenges, the Royal Government of Cambodia (RGC) embarked upon environmental governance reforms in November in 2013. These focus on three pillars of action:
6. MoE modernization.
7. Establishment of the National Council for Sustainable Development (NCSD).
8. Development of an Environmental Code.
9. In support of rolling out the environmental reform agenda, under joint financial resources from the United States Agency for International Development (USAID), Government of Japan, United National Environment (UNE) and United Nations Development Programme (UNDP), the *Environmental Governance Reform for Sustainable Development* (EGR) project was developed and approved in 2016. The EGR Project commenced implementation in June 2016 with donor funding of US$2.5 million from USAID, $300K from the Government of Japan and ~$78K from UNE. The target end date was the end of May 2018, however due to uncompleted work this was initially extended by 12 months to May 2019 (with an additional US$1 million from USAID and $20K from UNE), followed by a second, no-cost extension to end August 2019.
10. In accordance with UNDP project monitoring and evaluation (M&E) policies and procedures, the Project is required to undergo a Final Evaluation (FE) before completion of implementation. This Report presents the FE findings.

## 1.2 Purpose & objectives of the Final Evaluation

1. In accordance with UNDP M&E guidelines and procedures the overall purpose of the FE is to assess the achievement of project results and go draw lessons that can:
2. improve the sustainability of benefits from the project; and
3. aid in the overall enhancement of UNDP programming.
4. The objectives of the FE are:
5. To review and assess the overall achievements at results (outputs, outcomes and impacts) of the EGR Project (including the extension phases of the project).
6. To identify opportunities and challenges related to design, implementation and management of the EGR and provide recommendations on how different implementation approaches may be considered in future environmental governance projects.
7. To assess how the EGR project is related to and complements other ongoing environmental projects at MoE and the NCSD and their related activities.
8. To identify lessons learnt and impacts from the EGR project, with potential for replication or inclusion in national or sectoral policies.
9. To assess to what extent the programme contributed to the UNDP Country Programme and

# 2. EVALUATION METHODS

## 2.1 Guidelines & ethics

1. The FE followed the overall approach and methodology that was specified in the FE Terms of Reference (ToR) and also complied with:
2. The United Nations Evaluation Group (UNEG) *Ethical Guidelines for Evaluators, 2008.*
3. The United Nations *Universal Declaration of Human Rights*, in particular being sensitive to and addressing issues of discrimination and gender equality.
4. The FEC signed the *Evaluation Consultant Code of Conduct Agreement Form* before commencement of work (Annex 4). In particular, the FEC undertook to ensure the **anonymity** and **confidentiality** of individuals who were interviewed and surveyed.

## 2.2 FE Scope & approach

1. As outlined on pages 5 and 6 above, the FE was subject to a number of non-trivial limitations. ***The findings of this FE report should be considered in the light of those limitations.***
2. The overall FE workplan is presented in Annex 1. The FE assessed the project against the criteria of **relevance, efficiency, effectiveness, impacts, sustainability, coherence/complementarity** and **partnerships***.* The FE is drawn from evidence‐based information that is **credible**, **reliable** and **useful**. The Final Evaluation Consultant (FEC) followed a **participatory** and **consultative** approach ensuring close engagement with EGR Project Team, other relevant UNDP staff and RGC counterparts and other key stakeholders, including donors and other partners, as contained in Annex 2.
3. The FEC commenced by reviewing all relevant sources of information, including the Project Document (PropDoc), Annual Project Reports (APRs), project budget revisions, project files, technical reports produced by the Project, national strategic and legal documents, and any other materials that the FEC considered useful to an evidence-based assessment.
4. The FE included a field mission to Phnom Penh from 24 June to 2 July, during which interviews were held with stakeholders listed in Annex 2. The first meeting on arrival was with the UNDP Programme Analyst who has been managing Project matters since the end of the Project Manager’s contract in mid-April 2019, and who provided a project briefing to the FEC using PowerPoint – including:
5. The overall Project design including Project Results & Resources Framework (PRF).
6. Project coordination and implementation arrangements.
7. Project activities, achievements, successes, failures and lessons.
8. How the Project has met the PRF, including how Indicators and achievement of targets have been monitored and measured.
9. Adaptive management – how the Project has adapted to changes in external influences.
10. Summary financial report, including actual versus planned expenditure.
11. Prospects for sustainability.
12. A set of Evaluation Questions (EQs) were drafted (Annex 3). These were emailed to some stakeholders in advance of interviews to allow them to prepare if they wished. All responses were treated with strict respect for **anonymity**.
13. The EQs wee used as a general guide only and the actual interviews were semi-structured and remained flexible to reflect the position of the stakeholder and their role in the EGR Project. In all cases only a sub-set of these questions were asked, and interviews were allowed to follow alternative lines of enquiry depending how the stakeholder responded.
14. The FE assessed key financial aspects of the project, including the extent of co-financing planned and realized. Project cost and funding data were required from UNDP, including annual expenditures and variances between planned and actual expenditures.

## 2.3 Data triangulation

1. Wherever possible, triangulation (use of multiple, cross-checked sources of information) were applied to verify and substantiate information reported and to help overcome bias that may arise from single sources of information. For example, if a stakeholder reported a certain view on an issue, the EC actively sought views on the same issue from other stakeholders during separate interviews, and the view was reported as an FE finding if three or more stakeholders shared that view. When stakeholders reported views on matters that could be checked in documents – the relevant documents were checked. Conversely, when a document reported certain findings, these were verified by discussing with stakeholders involved with production and/or review of the document.
2. When it is not possible to apply triangulation for some Project parameters, due to lack of alternative data sources, for example finance and co-financing data, the reports provided by the Project on such data were accepted by the FEC at face value.

## 2.4 Assessment of Project achievements & FE ratings

1. Assessment of project achievements and performance was based on the expectations set out in the Project Results & Resources Framework (PRF) as contained in the ProDoc, which provides Project objectives, targets and indicators with corresponding means of verification.
2. The FE includes ratings of the project’s results and brief descriptions of the associated achievements in an *FE Ratings & Achievement Summary Table* in the Executive Summary of the FE report, based on the framework in Table 1 and the rating scales shown in Table 2.

TABLE 1: *Evaluation Ratings Framework*

|  |  |  |
| --- | --- | --- |
| **Project Element** | **Evaluation Rating** | **Reasons for Rating** |
| **Relevance:** | [From Table 2] | [Each rating must be justified] |
| **Project Design:** |  |  |
| **Effectiveness:** |  |  |
| **Efficiency:** |  |  |
| **Execution & management:** |  |  |
| **Impact:** |  |  |
| **Sustainability:** |  |  |
| **Overall Rating:** |  |  |

TABLE 2: *Evaluation Rating Scales*

|  |
| --- |
| **Rating scales:** |
| ***Ratings for*** ***Project Design, Effectiveness, Efficiency & Execution*** | ***Sustainability*** ***Ratings:*** | ***Relevance Ratings:*** | ***Impact Ratings:*** |
| * **Highly Satisfactory**: No shortcomings.
* **Satisfactory**: Minor shortcomings.
* **Moderately Satisfactory**: Some shortcomings.
* **Moderately Unsatisfactory**: Significant shortcomings.
* **Unsatisfactory**: Major problems.
* **Highly Unsatisfactory**: Severe problems.
 | * **Likely**: Negligible risks.
* **Moderately Likely**: Moderate risks.
* **Moderately Unlikely**: significant risks.
* **Unlikely**: Severe risks.
 | * **Highly Relevant**
* **Relevant**
* **Not relevant**
 | * **Significant**
* **Minimal**
* **Negligible**
 |
|  |  |

# 3. PROJECT DESCRIPTION

#

## 3.1 Summary overview

1. A summary overview of the EGR Project is given in section section 1.1 above, and full details are available in the UNDP ProDoc - for the sake of report efficiency these are not repeated here.

## 3.2 Development objectives & project components

1. The overall development objectives of the EGR Project are derived from the United Nations Development Framework (UNDAF) Country Programme Document (CPD) for Cambodia, as follows:
2. UNDAF-CPD Outcome 1: By 2018, people living in Cambodia, in particular youth, women and vulnerable groups, are enabled to actively participate in and benefit equitably from growth and development that is sustainable and does not compromise the well-being, natural and cultural resources of future generations.
3. UNDAF-CPD Output 1.1: Establishment and strengthening institutions, coordination mechanism and policies for sustainable management of natural resources and ecosystems.
4. The specific development objective of the EGR Project is to assist the RGC to implement its EGR agenda by supporting the creation of an enabling policy and legal environment for achieving sustainable development and effectively conserving and protecting environmental resources that are currently at risk, in a manner that contributes to poverty reduction, environmental sustainability and climate resilience.
5. The EGR Project seeks to achieve the development objectives through four Key Deliverables (KDs), as follows (note in the PRF the KDs are identified as Outputs 1 to 4):
* KD / Output 1: New structure of MoE operationalized.
* KD / Output 2: New NCSD organizational structure and authorities operationalized.
* KD / Output 3: New Environmental Code (EC) drafted.
* KD / Output 4: Integrated Ecosystem Mapping developed and operationalized.
1. The linkages of the KDs/Outputs to achieving the development objectives through a Theory of Change are shown in Figure 1 (from ProDoc). Under each KD/Output the Project implemented a range of activities, as shown in the PRF in Table 3 (from ProDoc).
2. In addition to assisting with these major reforms, the EGR Project also funded a number of “Quick Win” projects as an activity under KD/Output 1, to demonstrate on-the-ground progress in addressing technical environmental issues, as follows:
3. Installation of a solid waste incinerator at Kulen Mountain National Park, to mitigate large volumes of waste that had accumulated from Park visitation over years.
4. Installation of an automatic air quality monitoring system for Phnom Penh (network of sensors).
5. Development of CFL/LED technical guidelines for state offices plus a booklet for general public.
6. Development of environment related research agenda and ethics guidelines.
7. Development of guidelines on sub-national governance structure (Provincial and local government) for environment and sustainable development.
8. Implementation of branding and educational displays along NCSD corridor.



FIGURE 1: *The Theory of Change of the EGR Project (source: UNDP ProDoc)*

TABLE 3: *The Project Results Framework (PRF) for the EGR Project (adapted from ProDoc)(note: The PRF is titled ‘Results & Resources Framework’ in the ProDoc)*

| **Key Deliverable (KD) / Output** | **Indicators** | **End of Project Targets**(Target numbers added for this Table – in PRF not numbered) | **Activities** | **Responsible Party** | **Inputs (US$)** |
| --- | --- | --- | --- | --- | --- |
| **KD / Output 1**: New structure of MoE operationalized:   | **Indicator 1.1:** Number of subsidiary legislations (sub-decrees, royal decrees, amendments) related to support the MoE new structure and functions to strengthen environmental management.Baseline: A new decree on MoE structure (2015) Data source: MoE (annually). | Minimum 3 new subsidiary legislations inc: | Strategies and action plans with the focus on priority areas: 1. Refine the strategic framework and promote it throughout MoE.
2. Develop action plans for MOE strategic Priorities (2016-2023).
3. Communicate MoE priorities across government and to stakeholders.

Capacity building of the ministry and departments: 1. Support the senior management team.
2. Develop communication plan.
3. Develop human resources plan.
4. Support working group on development cooperation, planning and budgeting.
5. Management of potential revenues and funds.

Planning and supporting for the quick wins: 1. Identify quick win projects including the areas of PA management, waste management, climate resilience, sustainable cities, EIAs.
2. Implement quick win activities.
3. Document status and next steps for quick-win projects.
 | NCSD | 933,500 |
| Target 1.1.1: Amendments to law to redefine MoE including EIA role. |
| Target 1.1.2: Sub-decrees (prakas) on new MoE departments. |
| Target 1.1.3: Final version of EIA law. |
| **Indicator 1.2:** Extent to which the institutional capacity of the MoE is enhanced to address environmental issues:Baseline: To a limited degree (2015) Data source: MoE (annually). | Target 1.2.1: Strategic action planning with budget planning. | NCSD | Covered by 1. |
| Target 1.2.3: Human resources plan in place. |
| Target 1.2.4: Communications plan in place. |
| Target 1.2.5: Procedures for funds management. |
| Target 1.2.6: At least two quick-win projects being formulated. |
| **KD / Output 2**: New NCSD organizational structure and authorities operationalized:   | **Indicator 2.1:** Number of institutions with improved capacity to address climate change issues:Baseline:  1 NCSDData source: NCSD (annually). | Target 2.1.1: Minimum of 3 institutions. | NCSD strategies and action plans:1. Develop an overall strategy and action plan for making the NCSD effective.
2. Develop action plans for NCSD (2016-2023).
3. Communicate priorities across Government and to Stakeholders.

Capacity building of NCSD and departments:1. Strengthen NCSD and Secretariat.
2. Strengthen General Secretariat Departments (1. Admin, Planning and Finance, 2. Climate Change, 3. Green Economy, 4. Science and Technology and 5. Biodiversity).
3. Strengthen capacity of member agencies.
4. Develop resource mobilization strategy.
 | NCSD / UNDP | 1,071,278 |
| **Indicator 2.2:** Extent to which the institutional capacity of the NCSD is enhanced in formulating, directing and evaluating policies, strategic plans, action plans, legal instruments etc:Baseline: To a very limited degree (2015) Data source: NCSD, CCCA (annually) | Target 2.2.1: Strategic action planning with budget planning. |
| Target 2.2.2: No. of Council meetings. |
| Target 2.2.3: Number of legal instruments developed. |
| **KD / Output 3**: New Environmental Code (EC) drafted:  | **Indicator 3.1:** Number of laws or regulations addressing biodiversity conservation officially proposed, adopted or implemented:Baseline: N/aData source: MoE (annually). | Target 3.1.1: Minimum 2 (Environmental Code, EIA law). | Creating overarching Principles: 1. Establishment of secretariat, STWGs, and inter-ministerial working group.
2. Initial analysis of existing policies, laws and regulations and relevant international experience to identify best principles and standards for environmental management in Cambodia.
3. Analysis of existing policies, laws and regulations to identify overlaps among relevant ministries, and recommendations for improved management arrangements across government.
4. Development of general principles and objectives for the Code.

Development of proposals for statutory changes and implementation framework:1. Identification, research and formulation of innovative tools and mechanisms such as enforcement of citizen rights, green tax policy etc.
2. Development of an initial Code, including proposals for statutory changes and creation of new laws, such as EIA.
3. Public consultation workshops to present and receive comments on the draft Code.

Final drafting of the Code:1. Compilation of all components into a unified Code structure.
2. Support to the Ministry during the government and National Assembly approval processes.
3. Detailed work plan for public outreach, capacity building, pilot programming and other steps to promote effective implementation of the Code.
 | NCSD / UNDP | 198,700 |
| **Indicator 3.2:** Number of public consultations organized for the development of Environmental Code:Baseline: N/aData source: MoE (annually). | Target 3.2.1: At least 3 public consultation workshops and outreach activities involving local communities. |
| **KD / Output 4**: Integrated Ecosystem Mapping developed and operationalized:   | **Indicator 4.1:** Extent to which ecosystems maps are integrated at the national level to show the status of forest, lands, water, biodiversity, critical ecosystems:Baseline: NoneData source: UNDP (annually). | Target 4.1.1: Integrated ecosystem mapping developed and operationalized for national land use decisions. | 1. Consolidation of existing of spatial data on ecosystems, biodiversity, rural livelihoods, development activities and energy.
2. Designing and establishment of a Decision Support System (DSS) for land use planning.
3. Capacity building of MoE and NCSD for data management in regularly collecting, updating and managing environment and development data.
 |

# 4. TERMINAL EVALUTION FINDINGS

## 4.1. UNDP comparative advantage

1. The FEC finds that implementation of the EGR Project through UNDP benefitted from UNDP’s comparative advantage as a development enabler. This comparative advantage is based on the long-standing physical presence of the UNDP Country Office in Cambodia, with a long history of UN support to the RGC on a wide range of political, governance, social, economic and sustainable development issues. As a UN agency UNDP is trusted in Cambodia as a neutral, impartial, objective, a-political development partner, backed by an enormous global body of technical expertise and experience in international development.
2. The UNDP Country Office has well established and effective working relationships with relevant Central and Provincial Government agencies, and in-depth understanding of Cambodian laws, policies and procedures. Overall UNDP has huge international experience with capacity development programs, and an ability to access international expertise on an extremely wide range of issues, both from within and outside the UN system.

## 4.2 Design of Project technical components

1. The technical components of the Project as outlined in section 3.2 are assessed to be well conceived and designed based on best practices in the relevant areas of focus. They are clearly designed to provide MoE and NCSD with the essential legal and governance frameworks, organizational structures, policies, procedures, systems and technical capacity needed to move Cambodia towards being a leader in environmental protection, natural resource management and sustainable development.
2. The high quality design of the technical components of the Project benefitted from strong commitments and inputs from staff and experts from UNDP, USAID, Government of Japan, UN Environment and MoE and NCSD, as well as expert consultant’s who were engaged to assist with Project design. It also benefitted from the fact that the Project concept responded directly to a major national reform agenda, as already well conceived, formulated and initiated by the Minister for Environment. During project design MoE and NCSD were able to work closely with the development partners and the project design consultants, to strongly determine the objectives, focus and design of the Project in accordance with its EGR agenda. This approach provides a best practice model for the design of other similar projects, and is a credit to the parties involved.
3. However, the project design is found to be overly ambitious relative to limited timeframe (initially only two years and extended to three years and two months) and limited budget (initially only US$2.9 million cash grants with an additional $1 million provided later by USAID). The project design also only allowed for a very small, two-person Project Management Unit (PMU) (a Project Manager and Project Assistant only).
4. Given these constraints, the high rates of achievement of the Project are assessed to be outstanding, and a major credit to all parties involved.
5. The FEC assesses that given the high-level strategic significance of the EGR agenda, the revolutionary impact once fully implemented, and the wide scope and complexity of the Project’s four components, a more appropriate project design would have allowed for:
6. a minimum budget of $20 million in grant support with at least four times in-kind support from partners,
7. a time frame of 10 years divided into a five year development phase and a five year implementation phase; and
8. an expanded PMU with three Technical Managers under the Project Manager, one for components 1 and 2 (MoE and NCSD institutional strengthening), one for component 3 on the legal code and one for component 4 on integrated ecosystem mapping and data management.
9. The position classification of the Project Manager (UN P3) is also assessed to be too junior relative to the highly ambitious scope and complexity of the Project, the strategic political significance of the Project and the extremely senior level of engagement required with RGC officials (up to Secretary of State and even Minister). Ideally the project design (and budget) should have allowed for a P4 or even P5 classification.
10. The Project design also suffered from some weaknesses in the Project Results Framework (PRF) and M&E plan, as outlined in section 4.3.
11. It is recommended that the design of future projects should give more careful consideration to ensuring that the level of resourcing and implementation timeframe are better aligned with the objectives and scope of the project.

## 4.3 Project Results Framework & M&E plan

1. The PRF and M&E plan form the backbone of any well designed development project and if well formulated should provide powerful tools to support the successful management, monitoring and reporting of project implementation, including supporting the identification of any need for adaptive management responses. It is therefore useful to assess both the PRF and the M&E plan when undertaking the FE.
2. A PRF is normally based on a logical framework analysis (LFA), within which project elements are organized into a logical, cascading, interlinked hierarchy, including, in cascading order from strategic to tactical (with variations depending on the system):
3. Impact: The overall strategic impact that the project will have once all elements are implemented – for major policy reform projects, such as EGR, impacts may not occur until years after project completion.
4. Objective: The strategic objective that the project seeks to achieve in order for the Impact to occur.
5. Outcomes: Policy, legal, governance, administrative, management, capacity and similar reforms, improvements and developments that are produced as a result of completion of the Activities and Outputs, and which in turn drive achievement of the Objective and Impact.
6. Outputs: Technical products and results from the activities, which drive and deliver all higher elements in the framework.
7. Activities: Tactical, technical actions, which are undertaken in order to produce the Outputs.
8. In order to be able to monitor, measure and manage achievement of each of these elements, an LFA also normally includes Targets – and these can be aligned with any level in the hierarchy, although Targets are usually more usefully assigned to the more tactical elements (Outcomes, Outputs or Activities). Targets should also be time-bound, e.g. by mid-project, be end-of-project, within five years of project-end etc.
9. To allow assessment of achievement, each Target should also be accompanied by Indicators – and these should be quantitative and measurable, against an established Baseline, with a stated source and means of verification.
10. The PRF for the EGR Project is presented in Table 3, as adapted from the ProDoc. Assessment of this identifies a number of unusual aspects, including *inter alia*:
11. The Outputs listed would be more appropriate as higher level Outcomes, and many of the Activities listed would be more appropriate as Outputs, which would be achieved through subsidiary Activities.
12. The Activities are not logically linked to the superior elements in the framework, making cross-referencing and monitoring of achievements against higher-level elements difficult.
13. Some of the Targets are not meaningful or useful, e.g. Targets 1.1.2, 2.2.2 and 2.2.3 do no specify a quantum, making them open-ended and unable to be assessed in terms of achievement.
14. In the original PRF the Targets are not time-bound.
15. The Indicators are placed higher in the framework than the Targets, when Indicators should be designed to measure achievement of Targets (i.e. be subsidiary).
16. Some of the Indicators are difficult to measure – e.g. Indicator 1.2:*Extent to which the institutional capacity of the MoE is enhanced to address environmental issues.* To measure this would require a properly designed capacity assessment to be undertaken at both project-start and project-end, however this type of assessment is not provided for in the PRF, making this indicator of limited use.
17. The ProDoc also contains an M&E plan. Review of this finds that while the M&E Plan should be clearly linked to the PRF, using the PRF Targets and Indicators as the basis for M&E – there are no such linkages in the M&E plan for the EGR Project. The planned M&E activities are also quite limited, comprising:
18. Annual Quality Project Rating (AQPR): Conducted by a UNDP Quality Assurance Assessor against the quality criteria identified in UNDP's Project Quality Assurance System, as a strategic level of project oversight (but which bears no relationship to the PRF).
19. Annual Project Review (APR) Report: Developed internally by the PMU or UNDP for review and action by the Project Board (assessment of these indicates that they tend to focus on just reporting long-lists of activities that have been undertaken, with limited analysis of whether these activities have actually been successful in generating the planned outcomes and impact).
20. Financial Audits: An annual audit was conducted in January 2018 covering the period January to December 2017, and a “spot check” audit was carried out in December 2018, covering the period January to September 2018, following UNDP Financial Rules (note, given a major surge in expenditure since September 2018 – see section 4.4.5 – it is recommended that a detailed financial audit be undertaken for the whole Project after financial closure).
21. Final Evaluation (at Project closure): This report, by an independent, external consultant.
22. A key element was missing from the M&E plan - a Mid Term Review (MTR) by an independent, external consultant. Given the highly ambitious and complex nature of the Project, an MTR would have been useful in bringing a fresh, external perspective to assist adaptive management. Restricting independent, external evaluation to project-end is of limited value as it is too late to make improvements to the Project once it is closed.
23. It appears that the PMU and supporting UNDP staff achieved extremely impressive results through innate project management skills, driven by personality, commitment, strong work ethic and natural intelligence, but there appears to have been limited use of the PRF as a project planning, management and monitoring tool, and M&E implementation was not fully effective. Assessing the APRs and other internal progress reports indicates a tendency to focus on just reporting long-lists of activities that have been undertaken, with limited analysis of whether these activities have actually been successful in generating the planned outcomes and impact.
24. The true measure of success of a project is not how much money has been spent, how many activities have been carried out, how many documents have been produced, or how many training courses or workshops have been held, but whether or not the project has had the desired impact, in terms of actually building capacity and achieving the reforms needed for progress.
25. It would be useful for relevant UNDP staff (those involved in the design, development, management and monitoring and evaluation of such projects) to be provided with some formal training in project design and management, including in the development and use of PRFs and linked M&E plans as project planning, management and monitoring tools.
26. It is recommended that the design of future projects should give more careful consideration to ensuring a strong, clear and well articulated PRF and M&E plan, as these provide powerful tools for managing and monitoring project implementation.

## 4.4 Evaluation of project implementation & management

### 4.4.1 Implemenation modality

1. There are two main implementation modalities used by UNDP for national-level development projects, as follows:
2. Direct Implementation Modalities (DIM): UNDP retains direct control of project implementation including employing the PMU and managing all procurement, disbursements and M&E activities.
3. National Implementation Modalities (NIM): UNDP enters into an agreement with a relevant national government agency for it to assume all project implementation functions, including procurement, disbursements and M&E. Project funds are provided by UNDP to the national implementing agency to manage, with funds being provided on a replenishment against expenditure basis.
4. The EGR Project was implemented under a DIM arrangement, although UNDP also entered into a Letter of Agreement (LoA) with NCSD under which US$ 1, 033,450 (~25% of the final total Project budget) was provided to MoE for direct management of certain activities against a schedule of payments:
5. The LoA required that NCSD take full responsibility for all contracts and contractors, and where NCSD’s financial rules differ from UNDP’s then NCSD would be required to manage funds in accordance with UNDP’s financial rules, and required NCSD to submit quarterly cumulative financial reports to UNDP.
6. As far as could be ascertained through document review and consultation with stakeholders it appears that the DIM/LoA combination worked well, although it is not clear to the FEC that there was adequate financial auditing of expenditure trails relating to LoA disbursements. Given that the implementation status of some activities has been incorrectly reported (e.g. NCSD corridor branding, see point d) under Evaluation Limitations above), it might be prudent for UNDP to conduct a detailed financial audit once the Project is closed.

### 4.4.2 Project Board

1. To ensure that all project partners had input to the management of the Project, a Project Board was established with senior-level representation from UNDP as the Executing Agency, MoE and NCSD as the beneficiaries, and USAID, Government of Japan and UN Environment as donors/development partners. The Project Board was chaired by UNDP and the PMU acted as Secretariat.
2. From review of board meeting minutes and other documents, and consultation with stakeholders, it appears that the Project Board was an effective component of the management arrangements for the EGR Project, including:
3. enabling a high level of influence by MoE and NCSD over project implementation,
4. ensuring close communication between all Project partners at a senior level; and
5. empowering the Board with discretion to steer the Project in response to changing circumstances, needs and priorities.

### 4.4.3 PMU & staff turnover

1. To manage the day-to-day implementation of Project delivery UNDP established a small PMU comprising a Project Manager (UN P3) and Project Administration & Finance Assistant (UN SB3). The PMU staff worked alternately from an office provided at MoE for around three to four days a week and from the UNDP office for around one to two days a week. This is assessed as being a smart and effective modality – allowing both close, day-to-day integration with the beneficiaries at MoE and NCSD, and the ability to follow-up on procurement, disbursement and project reporting processes at UNDP.
2. The only deficiency with the PMU was its small size relative to the strategic and highly ambitious and complex nature of the Project, as outlined in section 4.2. The FEC also assesses that the position classification of the Project Manager should have been higher, as also outlined in section 4.2.
3. There was an unacceptable six-month delay to Project start and an unacceptably high turnover of Project Managers (three in just two years), and significant gaps without a dedicated Project Manager (Figure 2). During these gaps core UNDP staff who may not be experienced in complex project management had to assume the project management function. This resulted in a lack of continuity and significant lulls and surges in implementation activity – with a marked “rush” of activity in the last year of the Project.
4. It is recommended that for future projects, in order to prevent loss of implementation continuity through high turnover of key staff like the Project Manager, as occurred with the EGR Project, UNDP should provide greater security of employment for these positions. The simplest reform would be to issue employment contracts that run for the full duration of the Project rather than the current, insecure year-by-year contracts. Performance criteria can easily be included to allow non-performing staff to be terminated if necessary. The position classification should also be appropriate to the significance of the Project, in order to attract and retain the right candidates (see section 4.2).



FIGURE 2: *EGR Project - PMU staff continuity - showing unacceptably long gaps without a PMU and unacceptably high turnover of Project Managers*

### 4.4.4 Adaptive management

1. The FEC assesses that the Project players exhibited an outstanding capacity for adaptive management in response to changing circumstances, which is critical to project success. Examples included:
2. Empowerment of the Project Board with discretion to steer the Project in response to changing circumstances, needs and priorities.
3. A very rapid response by USAID to an identified need for additional funds to allow more substantive Project completion, with rapid approval of an additional US$1 million in funding to allow seamless continuity into an initial one year extension.
4. Flexibility and commitment within UNDP to allocate core staff to the project management role during gaps in having a dedicated Project Manager (although such gaps should have been avoided in the first place – see section 4.4.3).

### 4.4.5 Project finance & co-finance

1. In accordance with UNDP evaluation guidelines the FE includes an overall assessment of the financial aspects of the Project. However the FEC is not an accountant or financial auditor and no attempt at all has been made by the FEC to verify the Project financial data provided by UNDP – these data are accepted at face value. It should be noted also that despite requesting them, the FEC has not been provided with any financial audit reports for the EGR Project.
2. As outlined in section 1.1 and shown in the Project Data table at the front of this report, the EGR Project commenced implementation in June 2016 with donor funding of US$2.5 million from USAID, $300K from the Government of Japan and ~$78K from UNE, with an additional US$1 million from USAID and $20K from UNE in 2018, bringing the total funding from donors to circa US$3.9 million.
3. Table 4 shows overall Project expenditure against both the planned ProDoc budget and the amended Annual Work Plan (AWP) budgets for 2106 to 2018 and for 2019 up to 28 June. This shows overall expenditure rates of 53% in 2016 (which is to be expected as the PMU was not operational until after June), 93% for 2017 (when the PMU was in full operation), a reduction to 86% in 2018 (when there turnover between three different Project Managers). There is a jump to 100.4% expenditure in 2019, which is of note as that is only for the first six months of the year until 28 June. This represents a very significant surge in implementation activity in 2019, in a rush to complete Project activities.
4. The total expenditure rate to 28 June 2019 as shown in Table 4 is 80.5%, although UNDP advises that 96% of the budget has been committed. Of additional note is that the total budget for all AWPs to date, as shown in Figure 4, is US$4,916,157, compared to a total donor commitment of just under US$3.9 million. This indicates that an additional circa $1 million in funding has been secured, although a request to UNDP to explain this has not been addressed.
5. As outlined in section 4.3 an annual financial audit was conducted in January 2018 covering the period January to December 2017, and a “spot check” audit was carried out in December 2018, covering the period January to September 2018, following UNDP Financial Rules (note, given a major surge in expenditure since September 2018 it is recommended that a detailed financial audit be undertaken for the whole Project after financial closure).

TABLE 4*: Planned ProDoc budgets, AWP budgets and actual expenditures (to indicate implementation rate) (data from UNDP)*

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **2016 (USD)** | **2017 (USD)** | **2018 (USD)** | **2019 (USD) - (to 28/6)** | **Totals (USD) - (to 28/6/19)** |
|  | **ProDoc** | **AWP** | **Actual** | **Rate\*** | **ProDoc** | **AWP** | **Actual** | **Rate\*** | **ProDoc** | **AWP** | **Actual** | **Rate\*** | **ProDoc** | **AWP** | **Actual** | **Rate\*** | **ProDoc** | **All AWPs** | **Actual** | **Rate\*** |
| **Output 1:** | 216,000 | 149,904 | 0 |  | 237,600 | 448,686 | 408,833 |  | 96,613 | 601,708 | 489,736 |  | 89,957 | 89,957 | 99,773 |  | 640,170 | 1,290,255 | 998,342 |  |
| **Output 2:** | 238,140 | 53,190 | 0 |  | 235,440 | 113,508 | 52,801 |  | 258,145 | 153,463 | 57,376 |  | 87,455 | 87,455 | 95,986 |  | 819,180 | 407,616 | 206,162 |  |
| **Output 3:** | 879,420 | 796,364 | 553,160 |  | 277,560 | 641,029 | 633,446 |  | 145,800 | 328,517 | 400,121 |  | 16,200 | 16,200 | 29,206 |  | 1,318,980 | 1,782,110 | 1,615,933 |  |
| **Output 4:** | 122,796 | 241,814 | 97,483 |  | 91,800 | 113,150 | 124,090 |  | 76,302 | 153,046 | 93,255 |  | 20,898 | 20,898 | 28,788 |  | 311,796 | 528,908 | 343,616 |  |
| **Output 5:** | 142,452 | 62,122 | 40,280 |  | 281,032 | 306,950 | 290,231 |  | 206,802 | 380,943 | 342,830 |  | 157,253 | 157,253 | 119,431 |  | 787,539 | 907,268 | 792,772 |  |
| **Total:** | **1,598,808** | **1,303,394** | **690,923** | **53%** | **1,123,432** | **1,623,323** | **1,509,401** | **93%** | **783,662** | **1,617,677** | **1,383,317** | **86%** | **371,763** | **371,763** | **373,184** | **100.4%** | **3,877,665** | **4,916,157** | **3,956,825** | **80.5%** |

AWP = Annual Workplan Budget. Rate = Actual expenditure vs AWP.

## Evaluation of Project Results

### 4.5.1 Relevance

1. The EGR Project is assessed to be one of the most relevant projects that the FEC has evaluated, in that it responds directly to a major national reform agenda as already formulated and initiated by the Minister for Environment. As such the Project was driven by the needs and priorities of the beneficiary country rather than imposed by the development partners (demand- not supply-driven). The Project also fits well with UNDAF for Cambodia, UN SDGs and USAID development objectives.
2. It is recommended that the outstanding responsiveness of the EGR Project to directly meeting the defined needs and priorities of the beneficiary country should be adopted as a best practice model for the design of other projects (development projects tend to have greater beneficial impact when they are demand- rather than supply-driven).

### 4.5.2 Effectiveness - overall achievement of targets

1. There were 15 end-of-project Targets in the ProDoc PRF. As presented in the Table A in section ES3, the Target achievement rate was:
* Total Targets: **15**
* Targets Exceeded: **2** (13.3%)
* Targets Achieved: **6** (40.0%)
* Targets Partially Achieved: **5** (33.3%)
* Targets Not Achieved: **2** (13.3%).
1. There were also 31 Activities in the ProDoc PRF. As presented in the Table B in section ES3, the Activity delivery rate was:
* Total Activities: **31**
* Activities Exceeded: **1** (3.2%)
* Activities Delivered: **19** (61.3%)
* Activities Partially Delivered: **8** (25.8%)
* Activities Not Delivered: **3** (9.7%).
1. This may be considered a high project achievement rate considering the relatively significant constraints on available staff, time and budget. Overall the EGR Project delivered a wide range of often high-quality activities and outputs across all four Project components, in support of the overall strategic objective of supporting the RGC’s EGR agenda. Tables 6 and 7 list Project activities undertaken through service providers and consultancy contracts.
2. A significant achievement of the Project that the FEC wishes to highlight is establishment of the Cambodia Environmental Legal Network (CELN). This is a network to support capacity building and awareness raising of the Environment Code across the legal profession, including lawyers, judges, students and researchers. The CELN was initiated as during the development stage of the Code, as there was a big gap in existing internal capacity on environmental law in Cambodia. Continuation of the CELN post-Project will be essential to successful implementation of the Code.
3. Despite the high rate of achievement, many of the most important outputs that have been delivered by the Project remain to be finalized and fully implemented by MoE and NCSD, including *inter alia:*
4. finalization, adoption, enactment and implementation of the Environment Code,
5. operationalization of the integrated ecosystem mapping decision support system; and
6. operationalization of the new human resources and related management systems at MoE.
7. Without full implementation and operationalization of these and other key Project deliverables, much of the Project investment may be wasted. It is recommended that MoE and NCSD should give high priority to finalizing and fully implementing all key outputs that have been delivered by the Project but which have not yet been finalized, especially the Environment Code, HR plan and systems and integrated ecosystem mapping. It is recommended that UNDP, USAID and other development partners should support RGC as far as practicable in this regard, including through an EGR Project Phase 2 as outlined in section 4.5.5.

TABLE 6: *Service Providers & Consultants engaged by UNDP (data from UNDP)*

| **Project Output** | **UNDP Consultancy or Service Title / Subject** |  **Total Value (US$)**  | **Donor** | **Selection Method (e.g. public tenders, single supplier, etc)** | **Awarded to (person or company name)** | **Contract Start (Month/Year)** | **Contract End ( (Month/Year)** | **Status of final Deliverable at 30 June 2019** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Strengthening MoE and 2. Strengthening NCSD |  National Consultant for Resource Mobilization Strategies for Protected Areas Management |  $ 7,680.00  | USAID | Public tender | Mr. Nguon Pheakkdey | 30 May 2017 | 30 September 2017 | Done |
| National Consultant, Human Resource Specialist |  $ 16,500.00  | USAID | Public tender | Mr. Heap Nuon | 1 December 2017 | 16 March 2018 | Done |
| National Consultant, Communication Specialist (focusing on supporting the development of communication strategy) |  $ 8,400.00  | USAID | Public tender | Mr. El Chuon, | 1 December 2017 | 16 March 2018 | Done |
| International Consultant\_ Communication (focus on the development of communication strategy) |  $ 23,830.00  | USAID | Public tender | Mr. Nadim Boughanmi, | 4 December 2017 | 27 February 2017 | Done |
|  International Consultant \_ HR |  $ 41,240.00  | USAID | Public tender | Mr. Michel Verge | 4 December 2017 | 16 March 2018 | Done |
| HRINC firm |  128,425.00  | USAID | Public tender | Sandra D'AMICO | Oct 18 | End of June 19 | Done |
| IT firm (Norway Registers Development AS) |  64,310.00  | USAID | Public tender | Giedrė Balčytytė | 15 October 2018 | 18 January 2019 | Done |
| Communication Firm Two Way |  53,460.00  | USAID | Public tender | Seylark SAMOL | 15 November 2018 | 31 July 2019 | Pending (pending the design of Environment Code Booklet, expected by mid July 2019) |
| International Communication Consultant(focusing on the development of Environmental Code Booklet, MoE communication and NCSD communication booklet) |  29,200.00  | USAID | Public tender | Ms. Angela takats | 16 November 2018 | 11 March 2019 | Done |
| National Communication Consultant(focusing on supporting the international consultant to develop Environmental Code booklet, MoE communication and NCSD communication booklet) |  11,750.00  | USAID | Public tender | Mr. Chuon El | 14 Nov 2018 | 31-Mar-19 | Done |
| SDG Consultant |  9,300.00  | USAID | Single Supplier | Long Sovanarith | 09 NOV 2018 | 31 March 2019 | Done |
| SDG Int Consultants |  4,200.00  | TRAC | Public tender | Nina Schneider | 30 October 2018 | 7 December 2018 | Done |
| National Environmental Specialist |  4,500.00  | USAID | Single Supplier | Mr. Sisovann OUK | 8 March 2019 | 15 April 2019 | Done |
| hSenid |  93,271.00  | USAID | Public tender | Sampath Jayasundara | June 2019 | Aug 2019 | Pending(pending setting up HRIMS system, expected to be finalized by August 2019) |
| 3.Enviro Code | International Consultant, Environment Legal Specialist |  $ 33,125.00  | TRAC | Single Suplier | Ms. Patricia Flynn Moore | 30 September 2017 | 31 December 2017 | Done |
| Developing an Environmental Code for Cambodia |  853,213.50  | USAID | Public tender | Kagna Sao (Ms) | 01 August 2016 | 31 December 2017 | Done |
| Institute for Global Environmental Strategies Technical Review Environment Code |  $ 8,005.00  | USAID | Public tender | Institute for Global Environmental Strategies | 1 August 2017 |  August 2017 | Done |
| National legal Consultant |  36,000.00  | USAID | Public tender | Mr. Sokhamphou Sum | 12-Nov-18 | 31 July 2019 | Pending(pending for support to organize Legal Network consultation, expected by Mid July) |
| 4. Integrated Eco Mapping | International Conservation Planning expert for the Integrated Ecosystem Mapping Initiative |  57,200.00  | Japan | Public tender | Mr. Jeffrey Brett Silverman | 15 October 2016 | 30 June 2017 | Done |
| National GIS specialist for Integrated Ecosystem Mapping Communication Consultant |  31,500.00  | Japan | Public tender | Mr. La Veha  | 24 June 2016 | 31 August 2017 | Done |
| GIS specialist for Integrated Ecosystem Mapping |  27,000.00  | Japan | Public tender | Mr. Paul Richard Gager  | 26 June 2016 | 31 July 2016 | Done |
| Wildlife and biodiversity conservation Expert |  23,200.00  | USAID | Public tender | Ms. Sarah Msria Brook | End of September 2016 | December 20, 2016 | Done |
|  International advisor for Natural Resources Management and Protected Areas  |  99,495.00  | Japan | Public tender | Kent Jingfors  International advisor  | 27 October 2016 | 31 January 2018 | Done |
| National consultant for background research and consultations for and formulation of a draft Phnom Kulen Management Program |  14,840.00  | TRAC | Public tender | Mr. Nguon Pheakkdey | 31 January 2017 | 10 May 2017 | Done |
| International Strategic Planning and Knowledge Management Specialist  |  35,530.00  | Japan/USAID | Public tender | Mr. Rudolphus Cornelis Maria Crul | 30 July 2017 | 31 October 2017 | Done |
| National GIS specialist |  29,700.00  | USAID | Public tender | Mr. Nimol Vamoeun | 10 September 2018 | 31 March 2019 | Done |
| GIS portal developing, Aruna company |  28,930.00  | USAID | Public tender | Paul Gager (Mr.) | 12 Dec 2018 | 15 March 2019 | Done |
| 5. Project Management  | Project Final Evaluation (International) | 6,964.00  | USAID | Public tender | Hari Ramalu Ragavan | March 2019 | May 2019 | Mission conducted but report not delivered due to health. Contract terminated. |
| Project Final Evaluation (International) |  17,222.00  | USAID | Public tender | Steve Raaymakers | June 2019 | August 2019 | Pending |

TABLE 7: *Service Providers & Consultants engaged by MoE (data from UNDP)*

| **Project Component** | **Govt managed Consultancy or Service Title / Subject** | **Total Value (US$)** | **Donor** | **Selection Method (e.g. public tenders, single supplier, etc)** | **Awarded to (person or company name)** | **Contract Start (Month/Year)** | **Contract End****(Month/Year)** | **Status of final Deliverable at 30 June 2019** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Strengthening MoE | International Lead governance Advisor | 280,000.00 | USAID | Single supplier | Mr. Douglas S. Wright | Apr-17 | May-18 | Done |
| Incinerator at Kulen mountain in Siem Reap | 80,000.00 | USAID | Public tender | SOK VANNA Enterprise | 17-Nov | Feb-19 | Done |
| Atmospheric Monitoring Station (air Sensor and solar)  | 59,750.00 | USAID | Public tender | Hunan Guorul Instrument (GRI) Co, .Ltd. | Feb-19 | Apr-19 | Done |
| Local consultant for finalized SF | 15,000.00 | USAID | Public tender |  | 14-Jan-19 | Feb-19 | Done |
| 2. Strengthening NCSD | Develop research agenda and guideline on research ethics | 12,870.00 | USAID | Public tender | Mr. Neth Boromey | Sep-18 | March/19 | Done |
| Draft legislation on organization and structure and workplan and budgets of provincial institution in charge of SD | 10,230.00 | USAID | Public tender | Mr. Long Sovannarith | Aug-18 | 18-Oct | Done |
| Institutional flyer on NCSD branded space for NCSD | 8,327.00 | USAID | Public tender | Mr. Alexabdre Burgeat | July/18 | March/19 | Done |
| Consultancy report, guideline and booklet to promote public use of CFL/LED | 9,315.00 | USAID | Public tender | Mr. Kok Sothea | Nov-18 | March/19 | Done |
| Branded NCSD corridor and NCSD leaflet  | 3,000.00 | USAID | Public tender | Mr. Nop Sokhai | July/18 | March/19 | Not delivered |
| Trainings, meetings, workshops and conferences | 24,500.00 | USID | N/A | NCSD team arranged Trainings/meetings | Jun/2017 | May/2019 | Done |
| 3. Enviro Code | International Legal Advisor | 298,250.00 | USAID | Single supplier | Mr. Brian Rohan | Apr-17 | May-18 | Done |
| Local consultant for prepare the environment code and natural resource in Cambodia | 9,600.00 | USAID | Single supplier | Mr. Keo Piseth | 19-Mar |  June/19 | Done |
| National Legal team to review Environment Code (20 working days) | 28,000.00 | USAID | Public tender | -Mr. Lam Chea,-Mr. Im Sihol-Mr. Hak Sokheng-Mr. Liv Sovanna-Mr. Srun Thirith | May-18 | May-18 | Done |
| Trainings, meetings, workshops and conferences |  28,125.00  | USAID | N/A | MOE staffs arranged Trainings/meetings | Jun/2017 | May/2019 | Done |
| 4. Integrated Eco Mapping | National strategic planning Consultant | 15,000.00 | USAID/JAPAN | Public tender | Mr. La Veha | 30-Oct-17 | 15-Dec-17 | Done |
| GIS Specialist | 14,000.00 | USAID/JAPAN | Public tender | Mr. Sou Vireak | 25-Sep-17 | 28-Feb-18 | Done |
| Trainings, meetings, workshops and conferences | 20,000.00 | USAID/JAPAN | N/A | GIS staffs arranged Trainings/meetings | Nov/2017 | May/2019 | Done |
| 5:Project Management Support | Individual Service Contract Staff (GSSD)(1 programme officer, 1 administrative assistant and 1 finance assistant) | 13,124.00 | USAID | Public tender | -Ms. Oeurn Panchakneat-Mr. Keo Rathana,-Ms. Vann Dina | June/2017 | March/2019 | Done |
| Individual Service Contract Staff (MoE)(1 programme officer, 1 administration and finance assistant) | 8,438.00 | USAID | Public tender | Ms. Phally Phimean,Ms. Ngin Rachna | June/ 2017 | March/2019 | Done |

### 4.5.3 Efficiency

1. Efficiency may be defined as ‘value-for-money’ – how much is achieved for each dollar invested. Overall, given the high rate of delivery of Activities relative to significant staff, time and budget constraints, the Project can be considered to have been very efficient (high *delivery to resources ratio* = efficient).
2. Efficiency was enhanced though strong utilization of commitment and support from a wide range of partners – including UNE, US Government Agencies and others.
3. Stakeholders reported satisfactory UNDP procurement and disbursement processes – although delays in some cases, and efficiency was especially hampered by the gaps and turnover in the Project Manager position, resulting in lack of continuity and inefficient lulls and surges in implementation activity.
4. There are non-trivial questions about the use of a single-supplier private law firm to develop the Environment Code under a $750K contract (initially $500K with a $250K increase) equating to ~20% of total Project budget. Senior personnel reported that they felt that the contract for this major piece of work did not have adequate performance-based delivery, transparency and accountability checks and controls, reportedly making it difficult for UNDP to exercise sufficient control and oversight of the contractor’s performance (as manifested by the need for a 50% increase in the contractor’s fees – which is very high, and the issuance of no less than five contract amendments / extensions). Several stakeholders reported that at times the contractor departed from the Terms of Reference and began driving the Code development process in their own direction. A more ideal approach might have been to develop the Code through a well-resourced, MoE-led inter-ministerial working group, supported by experts.
5. While there are definitely lessons to be learned from this major component of the Project, the FEC has formed the view that at the strategic level, given the major positive impact of the Code if it is actually implemented, and considering the extremely short Project time-frame, use of a private law firm to coordinate drafting of the bulk of the Code in such a short time probably represents good value for money. Without this approach it is unlikely that the Code would have been delivered in as advanced a state of completeness as it was.
6. It is recommended that for future projects, when large private firms are engaged to implement major project components for relatively large fees, as was done under the EGR Project to develop the Environment Code, UNDP should ensure that contracting processes include stringent performance-based delivery, transparency and accountability checks and controls.

### 4.5.4 Impact

1. Given that those outputs of the Project that are designed to have the most significant impact in-terms of implementing the RGC’s EGR agenda have yet to be finalized and implemented – especially the Environment Code – it is too early to measure any significant impact. This needs to be assessed in future years once all Project outputs are fully implemented and operationalized.
2. If the Code is actually finalized and operationalized, it is likely to have an extremely significant, positive impact, and move Cambodia towards being a leader in best practice environment protection, natural resource management and sustainable development.
3. If the Code is not finalized and operationalized, then the overall impact of the EGR Project is likely to be minimal, and much of the Project investment will have been wasted. This further highlights the need for an EGR Project Phase 2, as outlined in section 4.5.5.

## 4.6. Sustainability & need for Phase 2

1. As outlined in section 4.5.2 the EGR Project has delivered a wide range of often high-quality activities and outputs across all four Project components, in support of the RGC’s overall strategic EGR objectives. However, as also outlined in section 4.5.2, many of the most important outputs that have been delivered by the Project remain to be finalized and fully implemented by MoE and NCSD, including *inter alia* the Environment Code, the integrated ecosystem mapping decision support system and the new human resources and related management systems. In order to ensure that Project investments to date have the intended beneficial impact, it is necessary that additional resources be provided post-Project to enable the much-needed finalization and operationalization.
2. It appears that MoE and NCSD are very actively seeking such resources, including from their own budgets and direct approaches to various development partners. It was reported that MoE intends to utilize resources from the new, US$50 million World Bank-GEF *Sustainable Landscape & Eco-tourism Project* to support further development and operationalization of the ecosystem mapping decision support system and data portal. It was also reported that several applications were submitted to the Japan International Cooperation Agency (JICA) in July this year for various projects that will support the EGR agenda. The US Department of Interior reported that it intends to continue providing training and capacity building on various subjects, including relating to the Environment Code, through its International Assistance Program.
3. However, there is a risk that in the absence of the EGR Project post-August 2019, these various initiatives may become disjointed and uncoordinated. The impact multiplier benefits that can accrue from integrating such investments into a strategic, coordinated, programmatic approach, as was provided by the EGR Project, will be lost. This could pose a risk to the sustainability of benefits from the EGR investments to date.
4. There is a clear need for an EGR Project Phase 2 – with a focus on finalizing and fully implementing the major outputs delivered by Phase 1 - including *inter alia* the Environment Code, the integrated ecosystem mapping decision support system and the new human resources and related management systems.
5. It is recommended that in order not lose the benefits from EGR investments to date, as a matter of high priority UNDP should start working with MoE, NCSD and potential partners to start designing and securing resources for an EGR Project Phase 2. Phase 2 should focus on implementing the major outputs of Phase 1 - especially the Environment Code, and incorporate lessons learned from Phase 1 – including from this FE report.
6. The Phase 2 Project could seek novel and innovative financing modalities, for example:
7. Partnering between UNDP, MoE, NCSD and infrastructure developers and financiers to demonstrate best practice EIA for major infrastructure projects such as the Phnom Penh – Sihanoukville expressway.
8. Partnering between UNDP, MoE, NCSD and the new “Green Belt & Road Initiative” to demonstrate best practice environment and social safeguards and green design in major projects.
9. Establishing Public-Private Partnerships (PPP) to implement viable waste management solutions in priority areas (UNDP has established PPP models).

# 5. OVERALL SUMMARY FINDING

1. The Cambodia EGR Project is assessed to be one of the most relevant projects that the Final Evaluation Consultant (FEC) has evaluated, in that it responds directly to a major national reform agenda as already formulated and initiated by the Minister for Environment. The Project was driven by the needs and priorities of the beneficiary country, rather than imposed by the development partners (demand- not supply-driven). In this regard it provides a best practice model for the design of other development projects.
2. The technical components of the Project are assessed to be well conceived and designed based on best practices in the relevant areas of focus. However, the project design is found to be overly ambitious relative to limited timeframe and budget. A much larger and longer, phased design would have been more appropriate given the highly strategic, ambitious and complex nature of the EGR agenda.
3. Despite major staff, time and budget constraints, the Project was still able to deliver a wide range of often high-quality activities and outputs across all four Project components, in support of the overall strategic objective of supporting the RGC’s EGR agenda. This is a major credit to all parties involved.
4. Despite the high rate of achievement, many of the most important outputs remain to be finalized and fully implemented by MoE and NCSD, including *inter alia:*
5. finalization, adoption, enactment and implementation of the Environment Code,
6. operationalization of the integrated ecosystem mapping decision support system; and
7. operationalization of the new human resources and related management systems at MoE.
8. Given that those outputs of the Project that are designed to have the most significant impact have yet to be finalized and implemented – especially the Environment Code – it is too early to measure any significant impact. This needs to be assessed in future years once all Project outputs are fully implemented and operationalized.
9. If the Code is actually finalized and operationalized, it is likely to have an extremely significant, positive impact, and move Cambodia towards being a leader in best practice environment protection, natural resource management and sustainable development.
10. If the Code is not finalized and operationalized, then the overall impact of the EGR Project is likely to be minimal, and much of the Project investment will have been wasted. This highlights the need for an EGR Project Phase 2, as outlined in section 4.5.5.
11. An annual financial audit was conducted in January 2018 covering the period January to December 2017, and a “spot check” audit was carried out in December 2018, covering the period January to September 2018, following UNDP Financial Rules. Given a major surge in expenditure since September 2018 it is recommended that a detailed financial audit be undertaken for the whole Project after financial closure.

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# ANNEX 1: Final Evaluation Workplan

|  |  |  |
| --- | --- | --- |
|  | **June 2019** | **July 2019** |
| **Activity** | **M****10** | **T****11** | **W****12** | **T****13** | **F****14** | **S****15** | **S****16** | **M****17** | **T****18** | **W****19** | **T****20** | **F****21** | **S****22** | **S****23** | **M****24** | **T****25** | **W****26** | **T****27** | **F****28** | **S****29** | **S****30** | **M****1** | **T****2** | **To 24/7** | **To 31/7** |
| 1. Start contract: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2. Skype briefing with EGR manager: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 3. Prepare & submit Inception Report: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 4. Document review: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 5. FEC C fly CNS to SIN: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 6. FEC fly SIN to PHN: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 7. Initial briefing from EGR team: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 8. Stakeholder consultations: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 9. Stakeholder consultations: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 10. Stakeholder consultations: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 11. Stakeholder consultations: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 12. Prepare Preliminary Findings: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 13. Present Prelim. Findings / debrief: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 14. FEC fly PHN to SIN: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 15. FEC fly SIN to CNS: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 16. Prepare Draft Evaluation Report: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 17. Prepare Final Evaluation Report: |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | Home base |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | Travel |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | Phnom Penh |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

# ANNEX 2: Cambodia EGR Project Key Stakeholders

| **Name** | **Position** | **Organization** | **Address** | **Role in EGR**  | **Email** |
| --- | --- | --- | --- | --- | --- |
| H.E. Sao Sopheap | Secretary of State  | Ministry of Environment (MoE) | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh | Project Board Member, representative from MoE.In charge of project support to MoE  | saosopheap@yahoo.com  |
| H.E Tin Ponlok | Secretary General | National Council for Sustainable Development (NCSD) | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh | Project Board Member, representative from NCSD. In charge of project support to NCSD  | etap@online.com.kh  |
| H.E Net Phaktra | Spoke Person of MoE | Ministry of Environment (MoE) | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh, Cambodia | Focal point from MoE for communication, MoE website, ICT strategy implementation.  | pheaktraneth@yahoo.com  |
| H.E. Soth Yea | Under Secretary of State  | Ministry of Environment  | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh | Focal person from MoE for Environmental Code and Legal Network.  | He did not use emailHP: +855 12 919 161 |
| H.E Ngin Lina | Director General  | General Directorate of Environmental Knowledge and Information, Ministry of Environment  | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh | Focal point from MoE for communication and GIS. | lina\_ngin2015@yahoo.com  |
| Mr. Touch Vina | Director | Department of Geospatial Information Service (GIS), Ministry of Environment  | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh | Focal point from MoE, component 4 on eco-system mapping. | vinatouch@gmail.com  |
| Mr. Khem Sovanna | Director | Department of Human Resources, Ministry of Environment  | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh | Focal point from MoE for project support on HR issues. | sovanna168@gmail.com  |
| Mr. Sona Long | Deputy Director | Department of Administration and Finance, NCSD  | 48 Samdach Preah Sihanouk Boulevard, Phnom Penh,  | Focal point from NCSD for project to SDG localization. | longsona@gmail.com  |
| Ms. Andrea Stone | Natural Resource Management Officer | USAID | No 1, Street 96, Wat Phnom, Khan Daun Penh, Phnom Penh | USAID focal person for the project.  | astone@usaid.gov  |
| Mr.Kohei Hori | Representative from Japan Embassy | Japan Embassy | 194 Preah Norodom Boulevard, Phnom Penh | Representative from Japan Embassy, Project Board Member. | kohei.hori@mofa.go.jp  |
| Mr. Tokioka Toshikazu. | First Secretary of Embassy of Japan | Japan Embassy | 194 Preah Norodom Boulevard, Phnom Penh | New Environmental Focal person, Embassy of Japan, since April 2019.  | toshikazu.tokioka@mofa.go.jp  |
| Mr. Andrew Raine | Former Regional Coordinator - Environmental Law and GovernanceAsia and Pacific OfficeLaw Division, UNEP Bangkok officeHe is now moving to UNEP Nairobi office.  | UNEP | UNON Gigiri, New Office Facility Block 1, Level 2, North Wing | During former post at UNEP Bangkok office, was UNEP focal point to the project.  | rainea@un.org  |
| Mr. Nick Beresford | Resident Representative | UNDP Cambodia | No.53, Pasteur Street, Boeung Keng Kang I, Phnom Penh | Representative from UNDP, board member. | Nick.beresford@undp.org |
| Ms.Rany Pen | Programme Team Leader | UNDP Cambodia | No.53, Pasteur Street, Boeung Keng Kang I, Phnom Penh | Oversee all projects under UNDP. | Rany.pen@undp.org |
| Ms. Moeko Saito Jensen | Policy Specialist | UNDP Cambodia | No.53, Pasteur Street, Boeung Keng Kang I, Phnom Penh | Lead in the design of the project, and in the start-up phase of the project.  | moeko.saito-jensen@undp.org  |
| Ms. Ratana Norng | Programme Analyst  | UNDP Cambodia  | No.53, Pasteur Street, Boeung Keng Kang I, Phnom Penh | Oversee the EGR project, closely engage with the PM to ensure proper implementation of the project in accordance to the project rules and regulations. | Ratana.norng@undp.org  |
| Mr. Adam Starr | Former Project Manager  | UNDP Cambodia  | Currently in Laos | PM April 2017 to January 2018 | adam.starr@undp.org  |
| Mr. Joel Jurgen | Former Interim Project Management Support  | Consultant | NA | Managed the project from February to June 2018 after Mr. Adam Star left the post in January 2018. | jurgens@umn.edu  |
| Mr. Nathan Leibel | Former Project Manager  | UNDP Cambodia  | NA | PM April 2018 to April 2019 | nathanleibel@gmail.com |
| Ms. Kim Sreykhuoch | Former Project Admin and Finance Assistant  | UNDP Cambodia  | No.53, Pasteur Street, Boeung Keng Kang I, Phnom Penh | Supported the PM focusing on admin and finance work.  | Sreykhouch.kim@undp.org  |
| Mr. Sum Sokhamphou | Consultant | Independent Consultant  | Phnom Penh | Development of Environmental Code Booklet, and Legal Network.  | sokhamphou@gmail.com  |
| Mr. Paul Garger | Technical Director to of Aruna Technology, and Consultant to the project  | Aruna Technology, Ltd | 417 Sisowath Blvd, Sangkat Chaktomuk, Phnom Penh | Technical support on the GIS component. | paul.gager@arunatechnology.com  |
| Mr. Peter Keller  | Team Leader | Africa and Europe Program | US Department of Interior  | U.S. Department of the Interior1849 C Street, NW, Room 3551Washington, DC 20240 | US support for legal code training. | peter\_keller@ios.doi.gov  |
| Ms. Sandra D’Amico | Managing Director of HR Inc, and service provider to the project  | HR Inc Cambodia  | 19, 242 Oknha Pich St. (242), Phnom Penh | HR outputs for the project. | sandra.damico@hrinc.asia  |
| Ms. Giedrė BALCYTYTE | Global Consulting Strategy Director, Norway Registers Development AS, and consultant to the project  | NRD Company | Løkketangen 20 B, 1337 Sandvika, NorwayCorrespondence address: Gynėjų str. 16, 01109 Vilnius, Lithuania | Produce ICT strategy for the project. | gba@nrd.no  |
| Mr. Vamoeurn Nimol | Consultant | Independent Consultant  | Phnom Penh | GIS/GPS outputs for the project.  | nimolva@gmail.com  |
| Ms. Megan Quenzer | Former Project Manager from Vishnu Law Group, who was the service provide to the project  | Changed job, no longer with Vishnu Law Group  | Phnom Penh Center, Block F, 5th Floor, Room 571, Phnom Penh | Led the Vishnu Law Group to produce Environmental Code. | Megan.Quenzer@greeningpreylang.org  |

# ANNEX 3: Evaluation Questions (EQs)

The EQs were used as a general guide only and the actual interviews were semi-structured and remained flexible to reflect the position of the stakeholder and their role in the EGR Project. Only a sub-set of these questions were asked in each interview, and interviews were allowed to follow alternative lines of enquiry depending how the stakeholder responded.

| **Parameter**  | **Evaluation Question (EQ)** | **Response** |
| --- | --- | --- |
| Relevance:  | 1. To what extent does the EGR interventions meet the needs of MoE/NCSD?
2. To what extent are the activities of the EGR project valid and aligned with national priorities the MoE/NCSD?
3. Were the activities and outputs of the EGR consistent with the overall objectives and goals of the EGR projects overall scope and objectives?
4. Related to activities and capacity level, was the programme timeframe (including activities during the extension phase) reasonable to achieve the outputs and outcomes?
 |  |
| Efficiency: | 1. Has the UNDP approach resulted in optimum transaction costs and oversight?
2. Were activities cost-efficient?
3. Were outputs achieved on time?
 |  |
| Effectiveness: | 1. How effective is the EGR project in achieving the objectives (outputs and outcomes).
2. To what extent were the EGR governance structures in particular, the project support board, was effective in facilitating smooth implementation?
3. To what extent were the objectives achieved / are likely to be achieved by the end of the project?
4. What were the major factors influencing the achievement or non-achievement of the objectives?
 |  |
| Impacts: | 1. What were the institutional changes resulting from the EGR interventions?
2. Did the project change the way the institutions are addressing internal administrative and the delivery of technical functions?
3. Did the project change the way the institutions are addressing externalities?
4. Where they’re any change management results in staff at the institutions?
5. What were the changes in staff behaviours to better address the institutions vision and mandate?
 |  |
| Sustainability: | 1. How the programmme achievements contribute to sustainability by engaging appropriate Government, non-Government and other relevant stakeholders.
2. To what extent has the EGR project contributed to nurturing Government ownership and leadership in the implementation of environmental and sustainable development results?
3. To what extent are the benefits of the EGR project likely to continue after its completions?
4. What were the major factors which influenced the achievement or non-achievement of sustainability?
 |  |
| Coherence/ Complementarity: | 1. Do the EGR project interventions complement other environmental/sustainable development initiatives implemented in Cambodia. Also, were there any significant overlaps?
2. Are the procedures and coordination among Development Partners harmonized and aligned?
 |  |
| Partnerships: | 1. To what extent have EGR project interventions forged new or strengthened partnerships among different stakeholders (Government institutions, development partners, private sector, civil society/academia?
 |  |

# ANNEX 4: FE Consultant Code of Conduct Agreement Form - Raaymakers

**Evaluators:**

1. Must present information that is complete and fair in its assessment of strengths and weaknesses so that decisions or actions taken are well founded.
2. Must disclose the full set of evaluation findings along with information on their limitations and have this accessible to all affected by the evaluation with expressed legal rights to receive results.
3. Should protect the anonymity and confidentiality of individual informants. They should provide maximum notice, minimize demands on time, and respect people’s right not to engage. Evaluators must respect people’s right to provide information in confidence, and must ensure that sensitive information cannot be traced to its source. Evaluators are not expected to evaluate individuals, and must balance an evaluation of management functions with this general principle.
4. Sometimes uncover evidence of wrongdoing while conducting evaluations. Such cases must be reported discreetly to the appropriate investigative body. Evaluators should consult with other relevant oversight entities when there is any doubt about if and how issues should be reported.
5. Should be sensitive to beliefs, manners and customs and act with integrity and honesty in their relations with all stakeholders. In line with the UN Universal Declaration of Human Rights, evaluators must be sensitive to and address issues of discrimination and gender equality. They should avoid offending the dignity and self-respect of those persons with whom they come in contact in the course of the evaluation. Knowing that evaluation might negatively affect the interests of some stakeholders, evaluators should conduct the evaluation and communicate its purpose and results in a way that clearly respects the stakeholders’ dignity and self-worth.
6. Are responsible for their performance and their product(s). They are responsible for the clear, accurate and fair written and/or oral presentation of study imitations, findings and recommendations.
7. Should reflect sound accounting procedures and be prudent in using the resources of the evaluation.

**Evaluation Consultant Agreement Form[[1]](#footnote-1)**

**Agreement to abide by the Code of Conduct for Evaluation in the UN System**

**Name of Consultant:** Steve Raaymakers

**Name of Consultancy Organization** (where relevant)**:** EcoStrategic Consultants

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

Signed at *Cairns, Australia* on *15 June 2019*

Signature: 

# ANNEX 5: FE Terms of Reference

[Pls refer separate document – not included here to keep size of this document reasonable]

# ANNEX 6: General Review Comments on Environment Code

Based on a very brief review only - of Version 11.1, April 2019.

Only those components of the Code with major review comments are listed.

| **Code element** | **Review comment** |
| --- | --- |
| Contents | * Does not contain a list of “Definitions” which is very unusual in a legal code.
* Would be stronger if all key terms were clearly defined, including *inter alia* “natural person”, “indigenous”, “environment”, “harm to the environment”, “sustainable development”, “pollution”, “invasive species” etc, ideally based on internationally accepted definitions.
* (the Glossary at the end of the Code is useful but is missing many key terms and these are not “legal” definitions).
 |
| BOOK 1Article 15 Gender | * In accordance with “inclusive” development principles this should be broader to ensure equity for all social groups not just women, including disadvantaged and vulnerable groups (who’s members may include males).
 |
| BOOK 2Title 2 EIA | * In accordance with best practice this should be broader than just “environment” –i.e. “Environment & Social Impact Assessment (ESIA) and ideally this should be the over-arching framework.
* Could benefit from Article on need for scientific rigour / use of best practice scientific methods for ESIA with reference to relevant international guidelines.
 |
| BOOK 3 |  |
| Chapter 3 Biosafety  | * Could be strengthened by presenting Cartagena Protocol as the overarching framework right up front in this Chapter – it only gets mentioned well into the Chapter.
 |
| Chapter 4 – Genetic resources | * Could be strengthened by presenting Nagoya Protocol as the overarching framework right up front in this Chapter.
 |
| Title 3 – Climate change | * Could be strengthened by presenting UNFCCC, Paris Agreement etc as the overarching framework right up front in this Title – does not appear until Article 194 and only in relation to reporting.
 |
| Title 4- Sustainable Production & Consumption | * Could benefit from up-front reference to researching, cataloguing, resurrecting and learning from long-standing traditional sustainable production and consumption, including but not limited to traditional ecological knowledge and sustainable traditional agriculture, as practiced in Cambodia for millennia.
 |
| Title 5 – Land use etc | * Could benefit from up-front reference to researching, cataloguing, resurrecting and learning from long-standing traditional sustainable land use planning, as practiced in Cambodia for millennia.
 |
| BOOK 4 |  |
| Title 1 – Natural protected areas etc | * Could benefit from an up-front statement on the overall National Protected Area Objective – i.e. the minimum % of each ecosystem and habitat type that should be protected, consistent with or in excess of CBD targets (including terrestrial, coastal and marine), and the need for the system to be truly “representative” of all ecosystem and habitat types in Cambodia.
 |
| Article 335 Categories etc | * Could benefit from reference to the IUCN Categories and setting these as the category guidelines for Cambodia.
 |
| Title 4 – Chapter 6 – Invasive species | * Focus is terrestrial. Aquatic and marine invasive species also a serious threat and need to be included.
 |
| Article 473 Classification of wildlife species | * Should clarify if this is just fauna or also flora and if just terrestrial or also aquatic and marine.
* To give greater clarity / certainty could benefit from reference to IUCN Red List category definitions – current use of terms “critically endangered”, “endangered”, “vulnerable”, “near threatened” etc are not defined.
 |
| Article 511 Wildlife recovery | * Focus seems to be on animals – what about plants? Also does this cover aquatic and marine?
 |
| Title 6 – Coastal, Islands and Marine | * Could be strengthened by presenting UNCLOS and especially Part XII Protection & Preservation of the Marine Environment as the overarching framework right up front in this Title.
* Could be strengthened by stating right up front that integrated catchment and coastal management, integrated ocean governance and ecosystem based management provide the fundamental guiding principles for this Title.
* Makes zero reference to the comprehensive marine environmental protection regime of the UN International Maritime Organization (IMO), of which Cambodia is a member – this is a major gap.
* Relationship between Article 558 on Protected Areas to Book 4, Title 1 is not clear – appears to be diluted for coasts, islands and marine.
* Currently no mention of Marine Spatial Planning as a major tool.
 |
| Title 8 – Sustainable fisheries | * Could be strengthened by presenting UNCLOS and the FAO Code of Conduct for Responsible Fisheries including inter alia Ecosystem Based Management of Fisheries, as the overarching frameworks right up front in this Title.
* Should include more explicit provisions for the protection, preservation and development of traditional, artisanal and subsistence fisheries (an important sector in Cambodia).
 |
| BOOK 6 |  |
| Waste & Pollution | * Where relevant Stockholm, Rotterdam and Basel Conventions should be referenced / applied.
 |
| Section 2 – Waste Permits | * Given high relevance to Cambodia should explicitly include international trade in and transfer of waste and permits under Basel Convention etc.
 |
| Chapter 5 – Marine Pollution Control | * Could be strengthened by presenting UNCLOS and especially Part XII Protection & Preservation of the Marine Environment as the overarching framework right up front in this Title.
* Makes zero reference to the comprehensive marine pollution prevention and control regime of the UN International Maritime Organization (IMO), of which Cambodia is a member – this is a major gap.
* Some Articles are inconsistent with the IMO regime.
 |

1. www.unevaluation.org/unegcodeofconduct [↑](#footnote-ref-1)