UNITED NATIONS DEVELOPMENT PROGRAMME
GLOBAL ENVIRONMENT FACILITY

GOVERNMENT OF KENYA

MIDTERM REVIEW OF UNDP/GEF PROJECT:

GEF GOLD KENYA: Global Opportunities for Long-term Development (GOLD) in the Artisanal Small-scale Gold Mining (ASGM) sector: Integrated Sound Management of Mercury in Kenya's ASGM

(GEF ID Number: 9708; UNDP-GEF PIMS ID Number: 5877)

FINAL REPORT

By:
Mr. Yilikal Addisu, Team Leader, International Consultant
Mr. Aron Kecha, National Consultant

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ACRONYMS AND ABBREVIATIONS

AGC	Artisanal Gold Council
ASGM	Artisanal and small-scale gold mining
ASMNET	Artisanal and Small-scale Miners Network
AWP	Annual Work Plan
BEP/BAT	Best Environmental Practice/Best Available Technology
CBO	Community Based Organization
CEJAD	Centre for Environment Justice and Development
CIRDI	Canadian International Resources and Development Institute
CSR	Corporate Social Responsibility
CTA	Chief Technical Advisor
ESMP	Environmental and Social Management Plan
FGD	Focus Group Discussion
FSP	Full Sized Project
GEF	Global Environment Facility
GEFOFP	GEF Operational Focal Point
GEF PIR	GEF Project Implementation Report
GEFSEC	Global Environment Facility Secretariat
GoK	Government of Kenya
HACT	Harmonized Approach to Cash Transfers
Hg	Mercury
KEBS	Kenya Bureau of Standards
KII	Key Informant Interview
KWFT	Kenya Women Finance Trust
LBDA	Lake Basin Development Authority
LOA	Letter of Agreement
MoECCF	Ministry of Environment Climate Change and Forestry
M&E	Monitoring and Evaluation
MSP	Medium Sized Project
MTR/MTE	Midterm Review/Midterm Evaluation
NEMA	National Environment Management Authority
NIM	National Implementation Mechanism
NGO/CSO	Non-Government Organization /Civil Society Organization
NPD	National Project Director
OECD	Organization for Economic Cooperation and Development
PIF	Project Identification Form
PIR	GEF Project Implementation Report
PM	Project Manager
POPP	Programme and Operations Policies and Procedures
PPG	Project Preparation Grant
PSC	Project Steering Committee
RBM/PCM	Results Based Management / Project Cycle Management
SDG	Sustainable Development Goals
SDoC	State Department of Cooperatives

SDoM	State Department of Mining
SESP	Social and Environmental Screening
STAP	GEF Scientific Technical Advisory Panel
TA	Technical Assistance
TAC	Technical Advisory Committee
TE	Terminal Evaluation
UNDP ERC	UNDP Evaluation Resource Centre
UNDP-GEF	UNDP Global Environmental Finance Unit
UNDP IEO	UNDP Independent Evaluation Office
UNDP POPP	UNDP Programme and Operations Policies and Procedures
UNEP	United Nations Environment Programme
WG	Working Group
WGC	Working Group Coordinator
WRMA	Water Resources Management Authority

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The MTR team is also indebted to the PSC and TAC members and everyone interviewed for investing their time and effort to provide the required information.

EXECUTIVE SUMMARY

A. Project Information Table

Project Title:	Integrated Sound Management of Mercury in Kenya's ASGM (IMKA) (PIMS5877)		
UNDP-GEF PIMS ID Number:	5877	**GEF ID Number:**	9708
Atlas Project Id (formerly award ID)	00108404	**Atlas Output ID (formerly Project ID):**	00108253
Planned Start Date:	July 2019	**Planned End Date:**	July 2024
UNDP Social and Environmental Screening Category:	Low	**UNDP Gender Marker:**	GEN2
Continent:	Africa	**PAC Meeting Date:**	August 1, 2018
Country:	Kenya		
Implementing Agency:	UNDP		
Implementing Partner:	Ministry of Environment and Forestry (ME&F)		
Management Arrangements:	National Implementation Modality (NIM)		
Financing Plan:	**USD**		
GEF Trust Fund	4,200,000.00		
(1) Total Budget Administered by UNDP	**4,200,000.00**		
Parallel In-Kind Contributions			
Government	16,000,000.00		
NGOs/CSOs	874,711.00		
(2) Total Co-Financing	**16,874,711.00**		
(3) Grand Total Project Financing (1)+(2)	**21,074,711.00**		

B. Project Description

In Kenya, 31 tonnes of mercury are estimated to be released to the environment annually. Studies show that 6.8% (~.2.1 tonnes Hg/year) is originated from the Artisanal and Small-scale Gold Mining (ASGM) sector of the country. Mercury concentrations in sediments collected from rivers in Migori ranged between 30 and 2,380 µg/kg.[1] Rivers in this region ultimately drain into Lake Victoria, which provides dietary fish for domestic consumption and export. Kenya has been a signatory to the Minamata Convention on Mercury since 10th October 2013, the Basel Convention on the Transboundary Movement of Hazardous Waste Disposal, which GoK ratified on 1st June, 2000, and the Rotterdam Convention which it ratified on 3rd February, 2005.

[1] Odumo et al. 2014: Impact of gold mining associated with mercury contamination in soil, biota sediments and tailings in Kenya

Kenya's ASGM sector is largely informal, and unregulated, and until its recent recognition by the Mining Act No. 12 of 2016, was illegal. The most critical barriers to the development of the ASGM sector in Kenya, are the informal nature of the sector, technology constraints, and access to finance among others. Financial institutions are not willing to invest in unformalized sectors. Therefore, formalization of the sector, and improving financial access are critical if miners capacity is to be enhanced to adopt safer and alternative mining technologies that will help in improving efficiency and production.

The *Integrated Sound Management of Mercury in Kenya's ASGM (IMKA) (PIMS5877) project* was designed to assist the GoK in reducing/eliminating the use of mercury in the ASGM sector.

The project is being implemented in four counties, targeting seven (7) priority project locations which include: Osiri, Masara and Kehancha in Migori County, Lolgorian in Narok County, Chavakali in Vihiga County, and Rosterman and Ikholomani in Kakamega County. The target is to reduce mercury use by 0.5 metric tonnes per year. Reductions were expected to start in year three (3) of the project), resulting in a total of 1.5 tonnes of mercury avoided over the duration of the 5-year project.

To realize the reduction/elimination of mercury use in the ASGM sector, the project is intervening in (i) Strengthening institutions and the policy/regulatory framework for mercury-free ASGM; (ii) Increasing the access of mining communities to finance to enable the procurement of mercury-free processing technologies; (iii) Increasing the capacity of mining communities for mercury-free ASGM through the provision of technical assistance, technology transfer, support for formalization, raising awareness, and disseminating best practices and lessons-learned on phase-out in the ASGM sector.

The project implementation has followed the UNDP's national implementation modality, according to the Standard Basic Assistance Agreement between UNDP and the GoK, and the Country Programme.

The Implementing Partner for this project is the Ministry of Environment Climate Change and Forestry (MoECCF). The Implementing Partner is responsible and accountable for managing the project, including the monitoring and evaluation of project interventions, achieving project objectives and outcomes, and for the effective use of resources.

C. Project Progress Summary

The project progress was assessed from the actual date of start (September 2020 to the date this report was prepared (March 2023). The mid-term evaluation was conducted in Nairobi where the project implementer and national-level stakeholders reside, and the 7 project sites in the four counties (Kakamega, Vihiga, Migori and Narok).

The MTR used both primary and secondary data and information obtained from key informant interviews, focus group discussions, field observations, and review of related literature and relevant documents.

There was a significant delay from the start of the project to the implementation of activities. The overall progress of the project is 36% against end of the project targets. There is better progress on outcomes 1 and 4. However outcomes 2 and 3, which are the key components of the project in realizing project benefits are still lagging.

D. MTR Ratings and Achievement Summary

Indicator Assessment Key

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

Project Strategy	Indicator	Midterm Level & Assessment	Achievement Rating	Justification for Rating
Objective: to reduce/eliminate the use of mercury in the Kenyan ASGM mining sector through provision of technical assistance, technology transfer, establishment of public private partnerships and facilitating access to financing for the purchase of mercury-free processing equipment.	Four (4) new partnership mechanisms established at national level with funding for sustainable management solutions for mercury elimination at ASGM	36% against end of project objective is achieved. No new partnership mechanisms have been established. Consultancy on financial products completed A prototype for financial mechanism has been developed by the project. However, there is no formal uptake from a financial institution yet.	Moderately Satisfactory (MS)	Project currently engaging finance entities through consultative meetings and trainings to develop/expand their products to include ASGM sector. Oral consensus with SMEP Microfinance Bank Limited and memorandum of understanding prepared.
	130,000 direct project beneficiaries (65,000 females and 65,000 males) for which the risk of mercury exposure has been reduced.	40% against end of project objective is achieved. A total number of 2,785 persons (1,169 women and 1,616 men) have been reached through project trainings, workshops, and field activities and awareness creating activities.	Moderately Satisfactory (MS)	Generally, the awareness level is very high on effect of mercury use on environment and health. Project has good visibility.

Project Strategy	Indicator	Midterm Level & Assessment	Achievement Rating	Justification for Rating
Outcome 1: Strengthening institutions and the policy/ regulatory framework for Mercury-free ASGM.	Outcome Indicator 1.1: Capacity of 4 government entities increased to improve their capacity to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector.	50% against end of project objective is achieved. A stakeholder engagement strategy has been developed.	Satisfactory (S)	The project has done well in establishing mining groups. Stakeholder engagement strategy, Capacity needs assessment and training manuals and

				plans were developed.
	Outcome Indicator 1.2: Enabling environment created through improved national policies and regulatory frameworks for ASGM and mercury phase-out in the ASGM sector	50% against end of project objective is achieved	Satisfactory (S)	The project reviewed and identified gaps in existing policies and regulations that would be barrier to mercury -free ASGM, two guidelines and one regulation were recommended as urgent. The project-has developed: Health, Safety and Environment regulations; Health, safety and environment guidelines; Guidelines for delineation of land licensing of artisanal miners.
Outcome 2: Assessment of Existing Financial Products, Development of new products , and availability of financial products that meet needs of women in mining.	Outcome Indicator 2.1: Loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners/cooperatives/ associations.	No new/improved financial products/mechanisms established. A prototype was developed. Two financial products are proposed for the ASGM sector.	Moderately Satisfactory (MS)	Consensus reached between MoECCF and SMEP and Memorandum of understanding prepared. The reason for delay is the unresolved issues in the formalization process.
	Outcome Indicator 2.2: 18 ASGM cooperatives/associations (of which 4 are women-led and 14 are men-led) are capacitated to apply for loans for mercury-free processing equipment/investments.	36% against the end of project objective is achieved	Moderately Satisfactory (MS)	The existing miner groups and mining associations have been made aware of the mining formalization plans in Kenya, non-use of mercury in ASGM and received some basic training on

				business management and record keeping.
Outcome 3: Increasing capacity for mercury-free ASGM through provision of technical assistance and technology transfer.	Outcome Indicator 3.1: 1.5 tonnes of mercury avoided through the introduction of BEP, BAT and socially and environmentally sound ASGM practices	Mercury use/releases avoidance not yet realized with project facilitation.	Unsatisfactory (U)	Project activities are still at the identification of mercury-free gold processing technologies. The project is not moving as planned to realize mercury reduction. The reason for the delay is reportedly the challenges in the formalization process.
	Outcome Indicator 3.2: 1,600 ASGM miners (of which 1/3 women miners) supported in their formalization processes leading to more sustainable income opportunities and safer working conditions. *End-of-Project Target: At least 1,600 miners (of which 1/3 women miners) supported in their formalization processes.*	No artisanal and small-scale mining group has been formalized.	Moderately Unsatisfactory (MU)	The mining groups are in the process of registering cooperatives, some have concluded the process. The project selected 16 Mining Associations' Demonstration Sites and 2 more will be established to make required 18. The project identified technologies for training. Process of issuance of mining permits curtailed by moratorium in place.
	Outcome Indicator 3.3: Route to market for mercury-free gold improved/established. *End-of-Project Target: Awareness raised of 54,600 people (16,380*	Mercury-free processed gold not yet produced with project facilitation.	Unsatisfactory (U)	No route to market for mercury-free gold established/improved yet.

	female and 38,220 male) on the dangers of mercury and ways to reduce its use in *ASGM*			
Outcome 4: Monitoring and evaluation, awareness raising, capturing and disseminating experiences, lessons learned and best practices	Outcome Indicator 4.1: Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM. *End-of-Project Target: Awareness raised on the dangers of mercury and ways to reduce its use in ASGM targeting 54,600 people (16,380 female and 38,220 male)*	40% against the end of project objective is achieved	Moderately Satisfactory (MS)	Information, education and communication material procured and distributed to 500 project beneficiaries. All consultative meetings, field missions, workshops, identification and mobilization of miners and trainings included a component on awareness raising on dangers of Mercury. All beneficiaries reached within the reporting periods. A total of 2785 beneficiaries reached.
	Outcome Indicator 4.2: M&E and adaptive management applied in response to needs and Mid-Term Evaluation findings. *End-of-Project Target: 38 of GEF M&E requirements met and adaptive management applied in response to needs and Mid-term Evaluation (MTE) findings.*	30% against the end of project objective is achieved as stated on the latest PIR	Moderately Unsatisfactory (MU)	A project monitoring and evaluation matrix is in place. MTR is just conducted.
	Outcome Indicator 4.3: Project results, experiences, lessons-learned and best practices are captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and	70% against end of project objective is achieved	Highly Satisfactory (HS)	Webpage developed. All project activity-based reports including challenges with lessons learned have been compiled and shared through the project social

	global dissemination, using report templates provided by the GEF GOLD global component where appropriate. End-of-Project Target: 1 GEF GOLD country project webpage maintained. End-of-Project Target: Country project participated in 1 Global ASGM Forum, 1 Annual Programme Conference, and 12 monthly programme/project calls on a yearly basis. End-of-Project Target: Opportunities for communication of project activity results at a global level are identified on a quarterly basis in collaboration with the GEF GOLD global component. End-of-Project Target: On a quarterly basis, information on project progress (using agreed metrics and templates provided by the GEF GOLD global component where appropriate) is submitted to the GEF GOLD global component.			media handles, and the PlanetGOLD global platform.

Ratings for project implementation, adaptive management and sustainability

Aspect	Rating	Justification for rating
Project Implementation and Adaptive Management	Moderately Unsatisfactory (MU)	The progress towards achieving the objective and each component/outcome and output is not satisfactory. Much need to be done regarding project management and adaptive management to realize most of the project outputs. The is no strong synergy among key stakeholders. The

		efficiency of the implementing partner, PMU and UNDP is not satisfactory. As learnt from the interviewees with stakeholders, the PM, CTA and TAC are disconnected. Mistrust and uncertainties are developed at project site level due to low performance as observed during the field observation.
Project Sustainability	Moderately Likely (ML)	The key to sustainability is ownership of the project interventions at all levels. In this regard awareness was created at national, county and local levels. More is expected from the project to grant sustainability; for instance, the formalization process has to be finalized as soon as possible, financial instruments have to be developed, and alternative mercury-free technologies have to be selected and disposed to the project sites.

E. Concise Summary of Conclusions

The GEF Gold Kenya is one of the projects supported by the planetGold Programme of GEF. The project is designed to reduce or eliminate mercury use in the ASGM sector, and avoid the health and environmental risks associated with mercury exposure. The project interventions are highly relevant to the Minamata Convention, The National Action for Artisanal and Small-Scale Gold Mining, and other national government priorities related to mercury reductions. Implementing the project will help the GoK to achieve various SDG goals (SDG 3, SDG 6, 12 and 14).

The project design identified and involved the key stakeholders to realize the project objectives, outcomes and outputs, and in sustaining the benefits. As learnt from the KIIs, FGDs, and field visits during the MTR process all stakeholders from national, regional to local levels are aware of the dangers of mercury on human health and the ecosystem. In this regard, the trainings conducted at all levels of administration and beneficiaries and the awareness campaigns were effective in bringing common understanding.

The key challenge in the underachievement of overall project outputs lies on the formalization process. Without formalization and licensing of the ASGM sector, component 2 and 3 are at risk. Formalisation is key to delivery of mercury free gold processing technologies to mining groups and associations. Devising financial instruments and mechanisms is also strongly linked to the formalization process. It is difficult for financing institutions to support an informal sector, without a risk sharing model developed to cushion the financial institutions.

There is better progress in the implementation of components 1 and 4. However, much needs to be done to implement component 2 and 3 of the project. The project is still at the identification of mercury-free processing technologies, and formalization of the selected mining groups and associations. The route to market component is not yet done, and there is no market link for gold processed through mercury-free technologies. There are no financial instruments and mechanisms developed to support the ASGM sector.

The root causes for the underachievement of project outputs are the implementation modality (NIM). The long bureaucracy at the GoK side and the challenges with the financial management system (IFMIS) have led to delayed project activities. Lack of /low sense of ownership of the project was observed as a cross-cutting issue in various stakeholders interviewed. Other challenges include, inefficient M&E by UNDP CO, composition of PSC (does not involve representatives from key stakeholders) and delays in resolving key constraints attributed to low performance. The PMU has also not created good synergy among project stakeholders.

F. Recommendation Summary Table

No.	Key Aspects	Description	Responsibility
1	Review the ProDoc	• The ProDoc need to be reviewed and changes/amendments made to allow for modification of indicators for consistency (absolute numbers verses groups). Also adopt a viable financing model guided by financial consultant's recommendation. The governance structure should allow for more oversight.	UNDP, PMU, MoECCF, TAC
2	Implementation Modality	• The NIM has to be changed to direct implementation modality or mixed approach to bring the project back on track and increase performance. This will allow UNDP to take over the financial management for key aspects of the project such as procurement of mercury-free technologies, and engagement of Responsible parties who are non-government agencies. • The project should have at least achieved the mid-term targets. But the financial system of the project is tied with the government financial management system (IFMIS). This has caused undue delays in release of funds to support interventions, thus delayed activities.	GEF, UNDP
3	PSC members	• Representatives of key partners such as SDoM, MoH and Cooperatives have to be included in the PSC for effective follow-up of project activities and project ownership • The PSC is the key decision-making body in the project organogram. Therefore, it has to be more proactive in providing guidance to the project. • A representative of the SDoM is already a TAC member but the technical advisory committee does not have the mandate to pass decisions on key project activities. • Resolutions from TAC meetings needs to be properly minuted with clear action points and timelines.	UNDP, GoK
4	Restructuring and strengthening the PMU	• The PMU is an essential part of the project to realize project benefits. The inefficiency in facilitating project activities is the main cause of much of the delay in project implementation. • There is a need to restructure and strengthen the PMU for better implementation, and to improve cohesion among its members. • In the absence of regional officers, the PMU should delegate the roles to the regional Mining offices that can second staff to fill in the gap.	UNDP, MoECCF, PSC

5	Build strong synergy among stakeholders	• As learnt from the interviews at national and county levels, there is a disconnect between the PMU and key stakeholders. • Need to improve communication, liaison and coordination with all stakeholders to enhance ownership and efficiency of project activities.	PSC, UNDP, PMU, TAC, MoECCF
6	Project ownership	• The project ownership is low. To increase ownership, the responsible parties need to be engaged and facilitated to undertake their roles as per the prodoc. • MoECCF cannot ensure sustainability unless the project interventions are owned by the relevant partners.	UNDP, PMU, PSC, MoECCF
7	Facilitate the formalization process	• The formalization process has been identified as the first step for implementation of outcomes and outputs. • Technical and financial support for SDoM and SDoCs is needed to finalize the formalization process. • To circumvent the challenge of Mining permits, there is need to focus on issuance of dealer processing licenses as part of formalization.	UNDP, PSC, PMU, MoECCF
8	Financial instruments	• No financial instrument has been yet developed for the ASGM sector. • Close collaboration with the financing institution is required and a risk sharing model has to be designed to sustain the project benefits. • The prototype developed with SMEP need to be refined and implemented.	PMU, MoECCF, Financial Institutions, UNDP
9	Technology selection and operation and maintenance cost	• Based on the ProDoc reduction of mercury should have started by now. The appropriate mercury-free technologies are not yet firmed up. There is need to liaise with Chief Technical Advisor (CTA) and SDoM to identify and develop technical specifications for the alternative technologies. • The beneficiaries should be consulted during selection of appropriate alternative technologies to maximize ownership. • The cost of operation and maintenance of the adopted technologies should be planned at least for the first few years of production.	UNDP, PMU, SDoM, Independent Consultants, MoECCF
10	M&E	• Strong M&E system and close follow-up of project activities is vital or better implementation. • The PMU should make use of Regional Mining Officers (RMOs) for better coordination, now that the regional officers are not in place. • The RMO should dedicate an officer to follow-up the day-to-day project activities and to provide technical support for the established mining groups • The project would benefit from experience sharing with similar projects in Africa to bring lessons learned in the formalization process and customize to Kenya's context. A team comprised of experts and officials from the	UNDP, PMU, MoECCF, Regional Officers, TAC

		implementing partner, PSC, PMU, SDoM, SDoC can benchmark on successful interventions within the region. suggested.	
11	Communication	• The project is performing well on communication and visibility. • There is a communication strategy developed for the project. but it is not being used properly. • Simple and efficient communication channels should be devised.	UNDP, PMU, TAC, CTA, MoECCF
12	Exit strategy	• An exit strategy has to be designed and developed to ensure sustainability of the project benefits. • The responsible government offices from national, regional and local levels should be identified to continue the project interventions and create ownership once project phase-out.	UNDP, GEF, MoECCF
13	No cost time extension	• The MTR team strongly advise to request and get approval for a no cost time extension to implement especially components 2 & 3 of the project. • The sustainability of the project lies on the formalization of the ASGM sector and financial instruments and mechanism to be designed. • At least an additional one year is required to materialize these.	MoECCF, UNDP, GEF

INTRODUCTION

Mid- Term Reviews (MTRs) are a mandatory requirement for all United Nations Development Programme (UNDP) Global Environment Facility (GEF) financed full-size projects. As a standard requirement for all projects financed by GEF, the MTR has been initiated by the Implementing Agency, (UNDP Country Office (CO) in Kenya. The MTR is being conducted by a team of two independent consultants. The MTR was carried out in compliance with the monitoring and evaluation plan as elaborated in the project document and in line with GEF / UNDP policies and UNDP Guidance for Conducting Midterm Reviews of UNDP-Supported GEF-Financed Projects2.

This MTR report presents the key findings of the mid-term evaluation for the IMKA Project. MTRs are primarily a monitoring tool to identify challenges and outline corrective actions to ensure that a project is on track to achieve maximum results by its completion.

Purpose of the MTR

The MTR aims to assess progress toward the achievement of the project objectives and outcomes as specified in the Project Document. It also assesses early signs of project success or failure with the goal of identifying the necessary changes to be made in order to set the project on track to achieve its intended results. The MTR also reviews the project's strategy and its risks to sustainability. In addition, the strengths and weaknesses of project implementation at all levels are outlined and recommendations for the way forward are formulated.

Evaluation Objectives

The objectives of the Mid-Term Review were to assess project performance against expectations set out in the project's Logical/Results Framework, to identify challenges and outline corrective actions to ensure that the project is on track to achieve maximum results by its completion, and to formulate constructive recommendations for the way forward.

Scope of Evaluation

The scope of the MTR was to assess the four categories of project progress i.e., project strategy; progress towards results; project implementation and adaptive management; and sustainability as detailed in Table 1: below.

Table 1: Detailed scope of the evaluation

Categories of project progress	Key tasks of the MTR
Project Design	Review the problem addressed by the project and the underlying assumptions; evaluate the relevance of the project strategy; assess how the project addresses country priorities and its alignment with policies and strategies; analyse the decision-making processes; see if gender and cross cutting issues were addressed properly and recommend areas for improvement.
Results Framework	Analyse the project's log frame indicators and targets and assess how "SMART" the midterm and end-of-project targets; suggest specific amendments/revisions to the targets and indicators as necessary; examine if project objectives and outcomes or components are clear, practical, and feasible within its time frame; examine if progress so far has led to, or could in the future catalyse

[2] http://web.undp.org/evaluation/documents/guidance/GEF/midterm/Guidance_Midterm%20Review%20_EN_2014.pdf.

	beneficial development effects that should be included in the project results framework and monitored on an annual basis; ensure broader development and gender aspects of the project are being monitored effectively and develop and recommend SMART 'development' indicators
Progress Towards Results	Compare the log frame indicators against progress made towards the end-of-project targets using the Progress Towards Results Matrix; comparative analysis of the GEF Tracking Tool/Core Indicators at the Baseline with the one completed right before the Midterm Review; identify key barriers to achieving the project objective in the remainder of the project life; recommend ways in which the project can further expand the benefits recorded at the mid-term level
Project Implementation and Adaptive Management	Assess in detail the management arrangements, work planning, finance and o-finance, project level monitoring and evaluation systems, stakeholder engagement, social and environmental standards, reporting mechanism, and communication and knowledge management aspects of the project
Sustainability	Validate whether the risks identified in the Project Document, Annual Project Review/PIRs and the ATLAS Risk Management Module are the most important and whether the risk ratings applied are appropriate and assess the Financial, Socio-economic, Institutional Framework and Governance, and Environmental risks to sustain the project interventions
Conclusion and Recommendations	Provide evidence-based conclusions, in light of the findings and succinct suggestions for critical intervention that are specific, measurable, achievable, and relevant for the way forward.

Methodology and Approach

The MTR covered all activities undertaken in the framework of the IMKA project to the period March 2023. The evaluation methodology was aimed at providing evidence-based information that is credible, reliable, and useful, based on predetermined objective evaluation criteria listed in the Terms of Reference.

The evaluation used a participatory and consultative approach guided by the available data using relevant analysis tools and frameworks. The data collection, analysis and interpretation methods used in the MTR process are described in detail in the following sub-sections.

The MTR focused on the following key aspects:

- Assessment of progress towards results
- Monitoring of implementation and adaptive management to improve outcomes
- Early identification of risks to sustainability and
- Emphasis on supportive recommendations

Analytical Framework

The MTR relied on both primary and secondary data sources. Primary data was collected through field observation, stakeholder interviews, and focus group discussions (FGD). Secondary data were collected through review of literature and documents. The MTR team made physical observations at select ASGM sites to triangulate information collected by other tools.

The collected data and information were analysed using standard tools and frameworks, to assess the current situation of the project, and overall project implementation. The lessons learned, conclusions and recommendations for the way forward were formulated based on the analysis results.

This final MTR report is prepared and submitted using the standard report outline presented on the ToR.

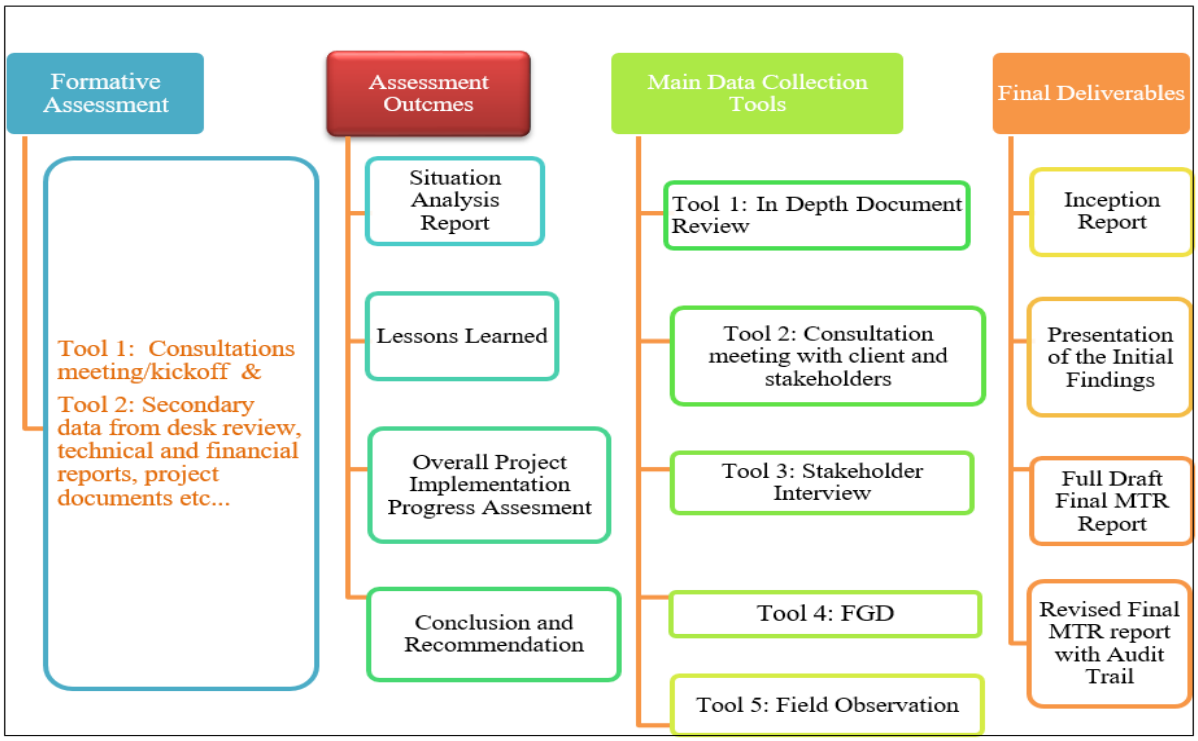


Figure 1: Analytical framework

Development of Data Collection Tools: A total of 5 data collection tools were used in the assignment (Annex 4: Questioner or Interview Guide used for the Data Collection). These included: 3 semi-structured Key Informant Guide for individual in-depth interviews (IIDI) targeting; (i) PMU, PSC, TAC and implementing agencies, (ii) for Ministries and other stakeholders, and (iii) financing entities. The fourth tool was a Focus Group Discussions (FGDs) guide for beneficiaries (Artisan miners and community) and experts of county offices. The fifth tool was a field observation checklist.

The semi-structured interview guides allowed interviewers the opportunity to pursue other lines of inquiry that may have emerged during the interviews. The guides focused on specific topics that are predetermined based on literature reviews and relevant project materials, including draft guides and information from UNDP.

Prior to conducting interviews and discussions, participants were taken through the informed consent procedures by the evaluators. After receiving information about the purpose of the review and participation in the evaluation, respondents had the opportunity to ask additional questions.

Documentation and Literature Review: The team reviewed all the documents prescribed in the ToR, and stated in Annex 8: List of Documents Reviewed. Key documents reviewed included: the documents prepared during the preparation phase (i.e., PIF, UNDP Initiation Plan, UNDP Social and Environmental Screening Procedure (SESP), the Project Document, project reports including Annual Project Review/PIRs, project budget revisions, national strategic and legal documents, and any other materials that the team considered useful for the evaluation.

The MTR team also reviewed the baseline GEF focal area Tracking Tool/Core Indicators submitted to the GEF at CEO endorsement and the midterm GEF focal area Tracking Tool/Core Indicators that must be completed before the MTR field mission begins.

In addition, related literature was collected from GEF GOLD Programme in other countries implementing similar projects. These were reviewed to summarize the key emerging knowledge and lessons that could help the IMKA Kenya project achieve its intended objective and outcomes.

Based on the initial findings from the desk study, a project progress evaluation matrix was developed. A detailed plan for the evaluation mission and site visits prepared and shared with UNDP and PMU.

Moreover, desk review helped to understand all stakeholders' achievements, roles and potential contributions and synergy regarding to project implementation, cross-cutting issues and gender mainstreaming.

Key Informant Interview: The MTR, targeted key stakeholders for in-depth interviews so as to incorporate the knowledge and perspectives of decision-makers, experts and special/subject matter advisors. The Key stakeholders interviewed included: UNDP, PSC, TAC, Ministry of Environment Climate Change and Forestry, State Department for Mining, State Department for Cooperatives, Ministry of Health, Ministry of Water and Sanitation, Kakamega County Government, Vihiga County Government, Migori County Government, Narok County Government, National Environment Management Authority, Centre for Environment Justice and Development, SDC, Net Fund, NECC, CSOs and senior officials and task team/ component leaders, key experts and consultants in the subject area. The interviewees from other stakeholders and local miners were selected based on their contribution to the project, experience, role in the project and gender.

Table 2: KIIs Conducted

Stakeholders	Target Key Informants Interviewed	Total Interviewed
PSC Members	4 members	2 KIIs
Technical Advisory Committee (TAC)	14 Members	7 KIIs
PMU	7 Members	6 KIIs
UNDP	6	4 KII
County	16	16 KIIs (from the 4 counties and all project sites)
Local Miners	11 KIIs (from established mining groups and associations)	
Financial Institutes	3	3 KIIs
Total	61	48 KIIs were conducted

Focus Group Discussion (FGDs): were held with the beneficiaries of the project disaggregated by sex. Two focus group discussions were planned for each site, one with male and one with female beneficiaries. The evaluators conducted each FGD with available participants using the FGD guide that was developed for this evaluation. The FGDs with the beneficiaries were conducted by the national consultant, and were recorded where possible since many of the miners refused to be recorded.

Table 3: FGDs conducted

Stakeholders	FGDs Planned	FGDS achieved
ASGM Sites	8 (2 per county)	9 FGDs (with mining groups including women)

Field Observation: At the field, the actual implementation of the project was assessed in order to cross-check the status of reported activities, and to summarize lessons learned for future use. Physical Observations were made at target sites and implementing sector offices where the project interventions are under implementation. The project progress was observed, photos taken, and the actual implementation capacity of the various stakeholders documented, based on the field observation checklist designed for this evaluation. The MTR team also conducted individual interviews of beneficiaries to develop success stories and document lessons learned.

All 4 project counties were visited as summarized in table 4, during which KIIs and FGDs were held.

Table 4: Visited Sites during the Field Mission

County	Project Site
Migori	Osiri Matanda
	Kehancha
Narok	Lolgorian
Vihiga	Vyalo
	Chavakali
Kakamega	Bushiangala
	Roasterman

Methods of Analysis: Both qualitative and quantitative data were analyzed, triangulated, and thematized as per the MTR objectives. Qualitative Data Analysis (QDA) targeted written data, pictures and audio-video records, interviews/records, and field notes from observations, FGDs & Stakeholder Interviews. Qualitative data analysis was carried out following the steps given in Figure 2 below.

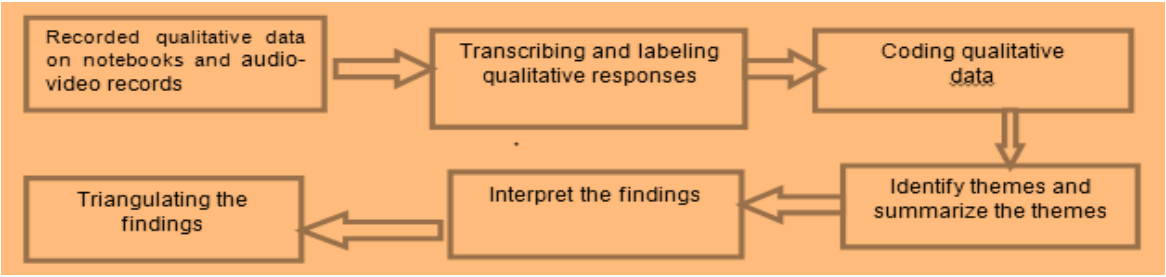


Figure 2: Qualitative Data Analysis Framework

To assess the progress toward results, the MTR utilized the scoring template developed by UNDP for MTR assessment, and standards set for project evaluation by UNDP/GEF (Annex 5: Rating Scales).

Furthermore, the Mid-Term Review conducted an assessment of project performance based on the expectations set out in the Monitoring and Evaluation Indicators in the project document. The indicators include Performance and Impact Indicators along with corresponding Means of Verification. Analysis was based on the following five main criteria:

I. **Relevance:** The extent to which the activities are suited to local and national development priorities and policies and to global environmental benefits to which the GEF is dedicated; the analysis includes an assessment of changes over time.
II. **Effectiveness:** The extent to which the results have been achieved or how likely they are to be achieved.

III. **Efficiency:** The extent to which results have been delivered with the least costly resources possible; also called cost-effectiveness or efficacy.
IV. **Sustainability:** The likely ability of an intervention to continue to deliver benefits for an extended period of time after completion. Projects need to be environmentally as well as financially and socially sustainable.
V. **Impact:** Verifiable long-term effects produced by the intervention, intended or unintended, direct or indirect.

Limitations

The International consultant was not able to travel to the counties and the project sites due to time constraints and logistical challenges. However, he was able to travel to Nairobi and conduct key informant Interviews at National Level. The county-level interviews and field visits were therefore undertaken by the National consultant. The approach enabled the reach of many stakeholders in a short period.

The PMU had challenges securing interviews on time during the mission by the international consultant. To address the challenges, the consultants working closely with the UNDP team managed to mobilize and secure interviews, using local networks. This was later complemented with online interviews for KIIs who were not able to be physically interviewed.

In addition, the assistance provided by UNDP and the PM for successfully conducting the MTR was not satisfactory. The interview schedules with key informants at national level, and logistical arrangements should have been organized prior to the arrival of the international consultant in Nairobi, guided by the itinerary submitted so as to facilitate a smooth MTR process.

Structure of the MTR Report

The MTR report comprises 5 main sections; the first three are dedicated to the executive summary; the introduction with objective, purpose and scope of evaluation; and the project description. The last two sections include the findings of the MTR describing the progress in all the 4 components of the project, the conclusion, recommendation and lessons learnt during the evaluation.

PROJECT DESCRIPTION AND BACKGROUND CONTEXT

Project Background

Kenya's entire mining sector contributes 14.2% to the GDP and employs about 200,000 people[3]. The Artisanal and Small-Scale Mining (ASM) sector was expected to contribute 3% in the year 2017 and 10% of the GDP by the year 2030[4]. Kenya's ASGM sector is largely informal, unregulated and until its recent recognition by the Mining Act No. 12 of 2016, was illegal.

Artisanal and Small-Scale Gold Mining (ASGM) are most active in Migori, Narok, Vihiga and Kakamega counties. However, Kisumu, Siaya, Pokot, and Turkana, also have significant ASGM communities. ASGM is the largest global source of anthropogenic mercury releases into the environment, accounting for about 35% of total mercury releases[5]. In Kenya, total mercury releases to the environment are estimated at 31 tonnes per year, of which 6.8% (2.1 tonnes Hg/year) originates from the country's ASGM sector (MENR, 2012). The estimated mercury releases from ASGM are 1.3 tonnes Hg/year, 0.4 tonnes Hg/year and 0.4 tonnes Hg/year into air, water and land, respectively[6]. Studies in ASGM areas show that Mercury concentrations in sediments collected from rivers in Migori ranged between 30 and 2,380 μg/kg[7]. Rivers in this region ultimately drain into Lake Victoria, which provides dietary fish for domestic consumption and export.

Many ASGM activities are carried out in remote and rural areas where little or no market support is available[8], and where mining is the best alternative to agriculture[9]. The vast majority of miners in Kenya are very poor, exploiting marginal deposits in harsh and often dangerous conditions, and with considerable impact on the environment. Women employed in mining traditionally crush ore by hand and concentrate or amalgamate the gold, producing high dust, injury, and mercury exposure hazard. Pregnant and lactating women are the most likely to suffer from the effects of mercury due to their roles in the gold production chain, and possibly through contaminated water and food[10].

The Government of Kenya has been a signatory to the Minamata Convention on Mercury since 10th October 2013, and is working towards its ratification. In addition to the Minamata Convention, Kenya is a signatory to the Basel Convention on the Transboundary Movement of Hazardous Waste, which GoK ratified on 1st June, 2000, and the Rotterdam Convention which it ratified on 3rd February, 2005.

Among the challenges to the development of the ASGM sector in Kenya, formalization, technology constraints and access to finance are the most critical. Therefore, formalizing the sector and improving financial access is critical in enhancing capacity of miners to adopt safer and alternative mining technologies, and improving their efficiency and production.

The *Integrated Sound Management of Mercury in Kenya's ASGM (IMKA) (PIMS5877) project* was designed to assist the GoK in reducing/eliminating the use of mercury in the ASGM sector. The overall

[3] Kenya, Republic of. 2016. Kenya Mining and Minerals Policy. Ministry of Mining

[4] Kenya, Republic of. 2016. Kenya Mining and Minerals Policy. Ministry of Mining

[5] http://wedocs.unep.org/bitstream/handle/20.500.11822/7425/-Inventory_of_Mercury_Releases_in_Kenya-2012Kenya_HgInventoryReport_2012.pdf.pdf?sequence=3&isAllowed=y

[6] Bell, L., Di Gangi, J., Weinberg, J., 2014. An NGO Introduction to Mercury Pollution and the Minamata Convention on Mercury, IPEN

[7] Odumo et al. 2014: Impact of gold mining associated with mercury contamination in soil, biota sediments and tailings in Kenya

[9] Kyalo M., Munyerere I., Rop B. and Maranga S. Scouring abandoned mines in search of elusive metal (gold) in Kakamega's Rosterman area - A case study in Kenya. Proceedings of the Sustainable Research and Innovation (SRI) Conference 6 - 8 May, 2015

[10] http://pubs.iied.org/pdfs/G00905.pdf

objective of the project is to reduce/eliminate mercury releases from Kenyan Artisanal and Small-scale Gold Mining (ASGM), thereby protecting the ecology and the community from the impact of mercury. Ultimately this serves the Long-Term Impact/ Global Environmental Benefits (mercury-free artisanal and small-scale gold production), through mining policy and legislation development, and the formalization of ASGM operations in Kenya.

The project is supporting seven (7) priority project locations which include: Osiri, Masara and Kehancha in Migori County, Lolgorian in Narok County, Chavakali in Vihiga county, and Rosterman and Ikolomani in Kakamega County. The target is to reduce mercury use by 0.5 metric tonnes per year (mercury reductions will likely start in year three (3) of the project), resulting in a total of 1.5 tonnes of mercury avoided over the duration of the 5-year project.

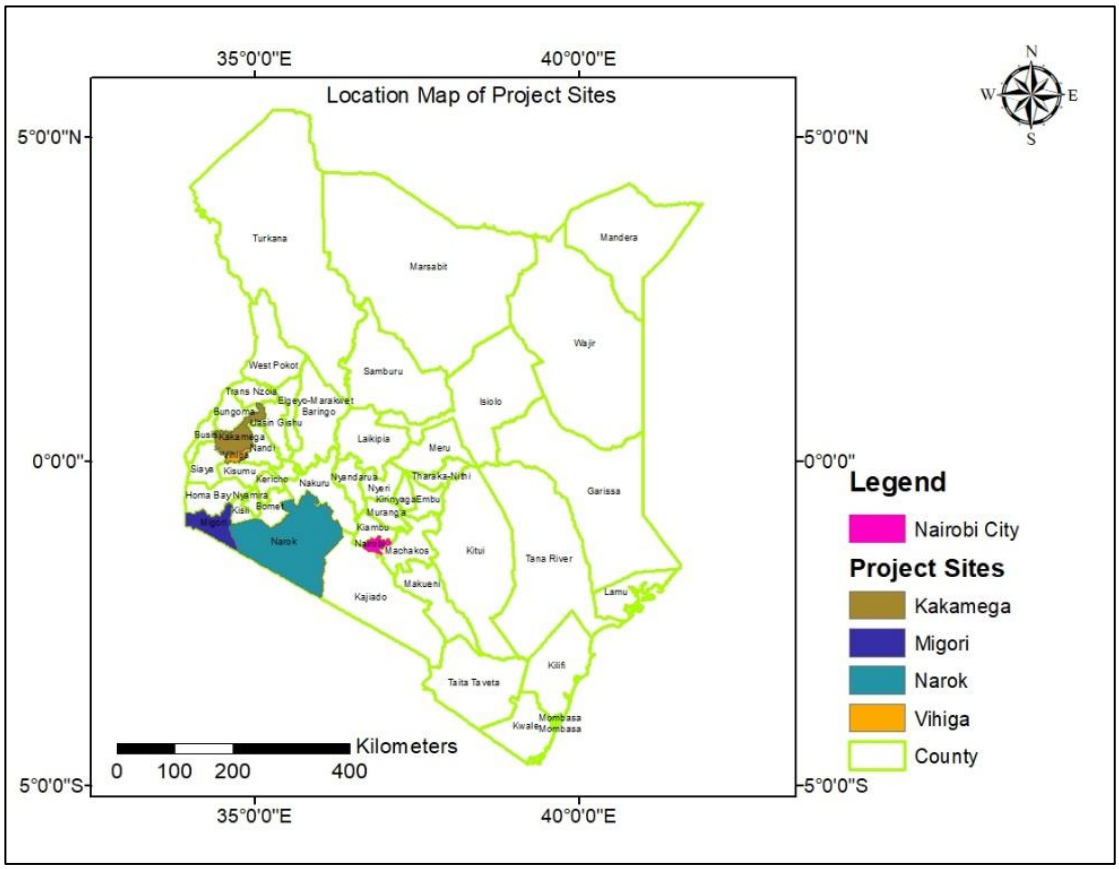


Figure 3: Location map of the project sites

Development Context

The IMKA project is a 5-year project designed to increase the capacity of the government and private sector and improve regulatory frameworks, so as to enable the formalization of the ASGM sector and the development of responsible mining. This will improve access to, and adequacy of financial and technical services for the ASGM sector for the uptake of chemical-free ore processing, and to pilot and train miners in the use of best practice technologies that eliminate mercury use.

The overall objective of the project is to reduce/eliminate mercury releases from the Kenyan Artisanal and Small-scale Gold Mining (ASGM) sector through:

I. Strengthening institutions and the policy/regulatory framework for mercury-free ASGM
II. Increasing the access of mining communities to finance to enable the procurement of mercury-free processing technologies
III. Increasing the capacity of mining communities for mercury-free ASGM through the provision of technical assistance, technology transfer and support for formalization and,
IV. Raising awareness and disseminating best practices and lessons learned on mercury phase-out in the ASGM sector.

The project has 4 components/outcomes feeding into the project objectives, as presented in the project document, which are summarized in Table 5: below.

Table 5: Project Outcomes and Indicators

Outcomes	*Outcome Indicators*
PROJECT COMPONENT 1 /OUTCOME 1: STRENGTHENING INSTITUTIONS AND THE POLICY/REGULATORY FRAMEWORK FOR MERCURY-FREE ASGM	Outcome Indicator 1.1: Capacity of 4[11] government entities increased to improve their capacity to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector.
	Outcome Indicator 1.2: Enabling environment created through improved national policies and regulatory frameworks for ASGM and mercury phase-out in the ASGM sector.
PROJECT COMPONENT 2 /OUTCOME 2: ESTABLISHING FINANCING LENDING ARRANGEMENTS TO PROVIDE LOANS FOR MERCURY FREE PROCESSING EQUIPMENT	Outcome Indicator 2.1: Loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners and
	Outcome Indicator 2.2: 18 ASGM cooperatives/associations (of which 4 are women led and 14 are men led) are capacitated to apply for loans for mercury-free processing equipment/investments
PROJECT COMPONENT 3 /OUTCOME 3: INCREASING CAPACITY FOR MERCURY-FREE ASGM THROUGH PROVISION OF TECHNICAL ASSISTANCE, TECHNOLOGY TRANSFER AND SUPPORT FOR FORMALIZATION	Outcome Indicator 3.1: 1.5 tonnes of mercury avoided through the introduction of BEP, BAT and socially and environmentally sound ASGM practices
	Outcome Indicator 3.2: 1,600 ASGM miners (of which 1/3 women miners) supported in their formalization processes leading to more sustainable income opportunities and safer working conditions.
	Outcome Indicator 3.3: Route to market for mercury-free gold improved/established
PROJECT COMPONENT4 /OUTCOME 4: MONITORING AND EVALUATION, AWARENESS RAISING, CAPTURING AND DISSEMINATING EXPERIENCES, LESSONS-LEARNED AND BEST PRACTICES	Outcome Indicator 4.1: Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM.
	Outcome Indicator 4.2: M&E and adaptive management applied in response to needs and Mid-Term Evaluation findings.
	Outcome Indicator 4.3: Project results, experiences, lessons-learned and best practices are captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and global dissemination, using report templates provided by the GEF GOLD global component where appropriate.

[11] National Level: Ministry of Environment and Forestry - ME&F (including the Adhoc Mercury Action Committee) and the Ministry of Mining (including the Artisanal Mining Committee); and County Level: two (2) Artisanal Mining Committees (the Kakamega and Migori County Artisanal Mining Committees).

Strategy and Theory of Change

The project aims to increase the capacity of government and private sector and improve regulatory frameworks so as to enable formalization of the ASGM sector and the development of responsible mining.

This will improve access to, and adequacy of financial and technical services for the ASGM sector to uptake chemical-free ore processing, and to pilot and train miners in the use of best practice technologies that eliminate mercury.[12]

The project's strategy was developed based on a Theory of Change (ToC), shown in Annex 3: Theory of Change Diagram. The ToC diagram summarizes the linkages between the development challenge and the immediate underlying, and root causes.

Mainstreaming Gender

Gender analysis was conducted during the preparation phase of the project. It allowed for the identification of the different roles and tasks that men and women perform in daily life, and in particular, in the ASGM sector, putting them at risk of exposure to mercury. The gender assessment also identified irregularities and power relations, inequities and inequalities and helped to recognize the causes of these inequalities. In addition, a Gender Action Plan was formulated to integrate gender in all project activities with the intention of achieving gender equality in all outcomes.

Implementation Arrangement and Stakeholder Engagement

The design of the IMKA project is based on multi-stakeholder engagement and consultations to ensure national institutional ownership of the project. The implementation strategy for the project used the existing governance structure at national, county and local levels. Artisanal miners, development partners, universities and the private sector are also included in the stakeholder map.

The legal framework for implementation of the project is the Standard Basic Assistance Agreement (SBAA) between the Government of Kenya and the UNDP. The project was designed for implementation under the National Implementation Modality (NIM), as per the NIM project management guidelines agreed between UNDP and the Government of Kenya. The Ministry of Environment Climate Change and Forestry (MoECCF) assumes the role of Implementing Partner (IP).

As the executing entity/implementing partner, the MoECCF:

- Assumes full responsibility for the effective use of UNDP resources and the delivery of outputs stipulated in the signed Project Document;
- Reports on project progress against agreed work plans in accordance with the reporting schedule and formats included in the project document; and
- Maintains documentation and evidence of the proper and prudent use of project resources in conformity to the project document and in accordance with applicable regulations and procedures.

Under the NIM, UNDP is accountable for effective and efficient use of resources for the achievement of project results in conjunction with the Implementing Partner. UNDP maintains the oversight and management of the overall project budget and is responsible for monitoring the project implementation,

[12] Project Document, 2019.

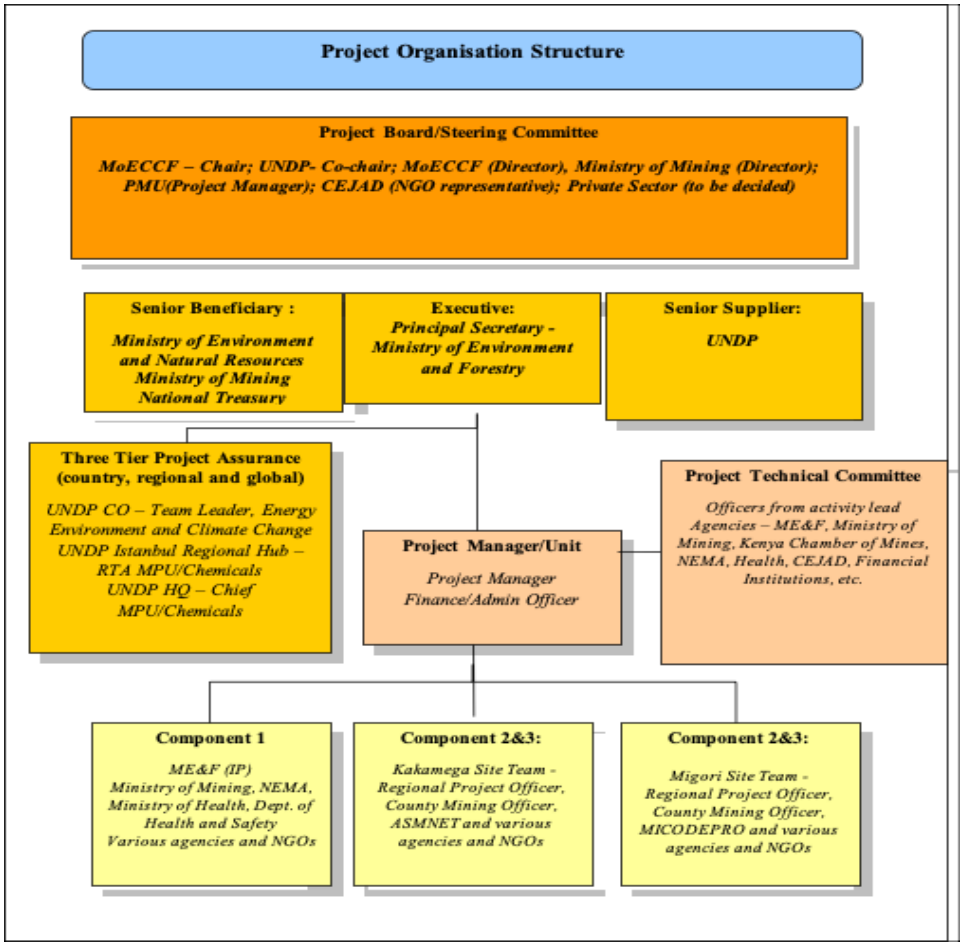
preparation of obligatory reports to GEF, and organizing mandatory evaluations as per standard GEF and UNDP requirements.

A Project Steering Committee (PSC) provides strategic guidance to the project implementation as well as an oversight function for the effective achievement of the project outputs and efficient use of the project resources. The PSC is chaired by a MoECCF representative and consists of key project stakeholders summarised in Figure 4.

A Project Management Unit (PMU), based within MoECCF, carries out the day-to-day management of the project. The PMU is led by the Project Manager (PM) who reports to the executing agency (MoECCF), UNDP, and the Project Board. The PMU will assume the responsibility of the project's implementation under the lead of MoECCF, the PSC and UNDP, planning activities and budgets, recruiting specialists, conducting training workshops and other activities to ensure the project is executed as per approved work plans. The PMU reports to the Directorate of Programmes.

Technical Advisory Committee (TAC) was established to provide technical assistance for the project. The members were designated by the line ministries and key stakeholders as outlined in the project document. The TAC is organized to support the PMU to realize the project objectives

Figure 4 Project Organization Structure (source: the ProDoc)



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FINDINGS

The key findings of the MTR are based upon the thorough assessment of the project implementation progress. They clearly outline the success so far and shortcomings. The evaluation was conducted using REEIS (relevance, effectiveness, efficiency, impact and sustainability) criteria. This was the basis to assess the four categories or pillars (Project Strategy, Progress towards Results, Project Implementation, and Adaptive Management and Sustainability) of the project.

Project Strategy

Project Design

The IMKA Kenya project was founded on the understanding of the health, social and environmental impacts of mercury. As clearly indicated in the ProDoc, Artisanal and Small-Scale Gold Mining (ASGM) is the largest global source of anthropogenic mercury releases into the environment, accounting for about 35% of total mercury releases[13]. In Kenya, the estimated mercury releases from ASGM are 1.3 tonnes Hg/year into air, 0.4 tonnes Hg/year into water, and 0.4 tonnes Hg/year on land[14]. The right to a clean and healthy environment is enshrined in Article 42 of the Constitution of Kenya, and Article 70 on the Enforcement of Environmental Rights[15]. The sound management of mercury to prevent acts, or emissions that affect the health and well-being of people and environment is therefore an obligation of the State.

Even though Kenya is a signatory of the Minamata Convention on Mercury since 10th October 2013, the GoK lacks a dedicated law on mercury, which makes it difficult to control the handling and movement of the chemical. To this end the project can play a great role in the reduction/elimination of mercury use in the ASGM sector, by enforcing policy and legal instruments.

The project design has four major strategic interventions: (i) Strengthening institutions and the policy/regulatory framework for mercury-free ASGM; (ii) Increasing the access of mining communities to finance to enable the procurement of mercury-free processing technologies; (iii) Increasing the capacity of mining communities for mercury-free ASGM through the provision of technical assistance, technology transfer, and support for formalization, and, (iv) Raising awareness and disseminating best practices and lessons-learned on mercury phase-out in the ASGM sector.

The design of the project is found to be the foundation and the key element to reduce/eliminate the use of mercury in the ASGM sector. This will avoid the impact of mercury on human health and the environment. The key findings on the project design are presented in Table 6: below.

[13] UNEP Global Mercury Assessment (2013)

[14] http://wedocs.unep.org/bitstream/handle/20.500.11822/7425/-Inventory_of_Mercury_Releases_in_Kenya-2012Kenya_HgInventoryReport_2012.pdf.pdf?sequence=3&isAllowed=y

[15] http://www.klrc.go.ke/index.php/constitution-of-kenya/118-chapter-five-land-and-environment/part-2-environment-and-natural-resources/237-70-enforcement-of-environmental-rights

Table 6: Summary of Findings on the IMKA Kenya Project design

Design Aspect	Findings
Challenges addressed by the IMKA Project	It is evident that the project addresses the global challenge of mercury pollution in ASGM, to reduce the health and environmental burdens associated with mercury exposure by miners and surrounding communities. The project also aims at providing the necessary financial, technical, and technological support, and creating awareness on the hazards of mercury, and hereby introduce mercury-free gold processing technologies. The key challenges in the ASGM sector are access to finance, technology constraints, and the informal nature of mining activities. To alleviate these challenges, the project aims to increase the capacity of government and private sector and improve regulatory frameworks so as to enable formalization of the ASGM sector and the development of responsible mining. The Theory of Change (ToC) in which the project strategy was based articulates the process of change by highlighting linkages in the interventions, outcomes, and outputs. The ToC seeks to address the development challenge by properly addressing the immediate and root causes. In this regard, the MTR team found the ToC well taught and properly developed. The project targeted the right beneficiaries. The ASGM sector was labelled as illegal until the enactment of the Mining Act in 2016. Due to this fact, the artisanal and small-scale miners were forgotten and did not receive the much-needed awareness on the negative impacts of mercury, let alone financial, technical, and technological support. This sector is responsible for releasing a significant amount of mercury to the environment at national and global levels. The artisanal mining sites in Kenya are located in the vicinity of Lake Victoria, thus the release of mercury into the air, water, and land presents pollution risk to the Lake and groundwater.
Context and Assumptions made	The IMKA Kenya project was planned in the best interest of the country. At this stage, many government offices at least understood the impact of mercury and the importance of interventions like this project. It was also assumed that reducing or eliminating mercury usage will help the GoK to work towards the achievement of the SDGs. The project identified strengthening institutions and policy/regulatory frameworks as a key step to realize the objective through the formalization of the ASGM sector. In this regard, the project identified the key stakeholders appropriately. In addition, establishing financial mechanisms, increasing capacity for mercury-free ASGM through the provision of technical assistance, technology transfer, and awareness raising, were thought thoroughly for the benefit of the project.
Extent to which Lessons from other relevant projects incorporated in the project design	Much could have been done in articulating lessons learned from similar projects. There are issues on the implementation modality. Under the current conditions, NIM is not working well for this project due to bureaucracies associated with the government systems. UNDP is requested to take over the financial management, especially on procurement of alternative technologies.

Alignment with country priorities and ownership of the project	The project design is aligned with SDGs, the constitution of Kenya, the Minamata Convention, the Mining Act of 2016, and the NAP. Therefore, the project design lays the foundation for project ownership.
Effectiveness of the routs towards expected/intended results	The project design is good in terms of empowering relevant institutions. More could have been done on capacity building at strategic level to create strong institutions to sustain the project interventions. Identifying the MoECCF as the implementing partner raised a question since the MoM has a key role in this project and the interventions are planned to be implemented on ASGM sites.
Decision making process	The PMU should have been established by UNDP. The GoK was responsible for recruiting the PM and PMU staff and this made the decision-making process weak. The financial flow is not smart and causing much delay. TAC is inactive and there is disconnect between the PMU and other stakeholders and no one seems to take responsibility to change the course of implementation. The regional advisors should have situated in the counties where the project sites are identified. UNDP should have taken the responsibility to manage the project since it has much experience in implementing other projects.
Level of consideration of gender issues in the Project Design	The project was identified as GEN2 (strongly gender mainstreamed project). The project design gave much attention for gender issues. But gender analysis was not conducted in line with the project design. Gender action plan was prepared later. The ASGM sector in Kenya has been suffering from gender inequalities. Women are more concentrated in the processing stage where they come into direct contact with mercury. In this regard the project design identified the gender issues. Gender activities were not budgeted thus a challenge to conduct gender analysis and implement the gender action plan.
Environmental and Social Risks Identification	The project design highlighted the major risks to project implementation. However, the risk to surface and ground water systems in the project sites were not deeply assessed. This could inform appropriate waste disposal mechanisms, especially for mercury contaminated tailings.
Sustainability and Viability of the Project	The main concern in the project design is the sustainability of the project. The flows highlighted in this evaluation and the time delay between endorsement of the project and actual start should have been foreseen. The project design should have been revised to incorporate unforeseen risks and modify the assumptions. The issues on the project design are directly linked to the sustainability and viability of the project. Development of an exit strategy is the key for sustainability of the interventions during project phase out.
Major areas of improvement	In the MTR teams' opinion, the implementation modality (NIM) is not working for this project. Many stakeholders interviewed proposed a need to rethink the NIM. The PMU has challenges of efficiency and synergy. There is need for improved supervision of PMU by PSC and UNDP for greater accountability. Better synergy is required between the UNDP, PMU and other stakeholders. There is disconnect between the TAC and PMU. The root cause to this lies in the project design as learnt from the KIIs. The project needs to establish proper waste management and disposal techniques for mercury contaminated tailings, so as to reduce risk of contamination of surrounding water and soil resources, and consequently Lake Victoria.

	The project also need to improve on stakeholder engagement, through enhanced consultation and coordination. In this regard during the project design more stakeholder consultation should have been conducted. At the time of writing this MTR report the project has left about 16 months and in the independent evaluators opinion much cannot be done since the formalization process is not yet finalized and the licensing process has issues. Though the major delay lies on the implementation phase the project design has its contribution since it is difficult to realize the impact of the project within 5 years in Kenya's context. Therefore, the project design needs revision and or amendment to incorporate the unforeseen issues.

Results Framework/Log Frame

The MTR team conducted a thorough analysis of the results framework/log frame and assessed how SMART the mid-term and end-of-project are and hereby suggest the key findings as presented on Table 7: below.

Table 7: Findings on the Results Framework

Provisions of the Results Framework	Findings
Indicators and Targets	The results framework includes 10 indicators and 78 targets towards realization of the four components of the project and 2 indicators for the objective. Generally, the mid-term and end-of-project targets are SMART (Specific, Measurable, Achievable, Relevant and Time-bound). For component 1 outcome indicator 1.1 and component 3 outcome indicators 3.1 and 3.2, conducting of various trainings is included on the targets (outputs). The impact of the trainings should be assessed properly and refreshment trainings be included if required. Capacity building should be seen at strategic level. Besides conducting trainings, capacity development strategy should be designed at least for the key stakeholders, before preparation of capacity building plans as outlined on indicator 1.1 output 1.1.2. The measures on the beneficiaries are referred as people in some parts and as group in others. Consistent unit of measure is required to track implementation.
Appropriateness and clarity of Project objectives and outcomes	The project objective is to reduce or eliminate mercury use in the ASGM sector. The project objectives will be realized through awareness creation, capacity building, establishment of financial mechanisms, provision of technical support and technology transfer. To this end the project is appropriate since mercury is now not only a national but also a global issue. The project objective and outcomes are very much clear and plausible.

	The issue is on the time frame of the project. Practically transforming the ASGM in Kenya from the informal to the formal sector would require more than 5 years.
Beneficial development effects that should be included in the project results framework	Awareness creation at national and regional level are the key to the success of this project. Therefore, institutional capacity development should be seen at strategic level not only by this project but also by future similar projects. Since Gold is not a renewable natural resource, other income generation activities should be sought for the artisan miners and the local community in the project sites. It will also be wise to include clean and safe water supply schemes including sanitation and waste disposal facilities.
Effectiveness of monitoring development and gender aspects of the project	The project's indicators and targets are well disaggregated in terms of sex, but should also include the youth, elderly and disabled. Since the targets (outputs) are presented in detail the results framework can be considered a good tool for monitoring and evaluation of project interventions.

Progress Towards Results

Progress to results was assessed based on data provided in the Project Document, project work plans, PIRs, GEF Tracking Tool, progress reports. This was complemented by analysis of data and information obtained from KIIs, FGDs and field observation using the evaluation matrix developed for this MTR. Rating was done as per the Guidance for Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects; colour coded "traffic light system" based on the level of progress achieved so far. The progress rating for each outcome was based on the rating scales provided in (Annex 5: Ratings Scales).

Progress Towards Outcomes Analysis

The ratings on the project's progress towards its objective and the four outcomes was provided based on the analysis of data and information provided in the PIRs, supplemented by data provided in the GEF TTs, the findings of the MTR mission, and interviews with the project stakeholders. The second implementation report of the project (PIR 2022) was used as a basis to compare planned and executed activities for the objective and the four components of the project. During the MTR process, some progress has been observed since the second PIR and was considered in the evaluation.

As the 'results framework' of the project has not provided the indicators at the level of outputs, the progress towards achievement of results has been assessed for different Outcomes in terms of the indicators and the targets for the set of outputs. It is important to note that in the present case the set of targets provided for the Outputs are in the form of activities, thus, the achievement of the targets for the Outcomes would not necessarily represent the achievement of the given Outcome of the project.

The project has 4 components/outcomes feeding into the project objectives, and the progress towards each component is presented in the following sub-sections.

Overall Project Objectives

Objective indicators: There are a number of targets the project is going to work towards to achieve the project's overall objective (in addition to the outputs and results that will be achieved through the four (4) project components).

The MTR team has found that there is a lot to be done to bring the project on track. The recent PIR indicates that the project is on track to meet its objective. But there has been only 6% progress in the project activities to meet its objective since the report. The achievements so far have been summarised in table 8: below:

Table 8: Progress Towards Overall Project Objectives

Project Strategy **Objective:** to reduce/eliminate the use of mercury in the Kenyan ASGM mining sector through provision of technical assistance, technology transfer, establishment of public private partnerships and facilitating access to financing for the purchase of mercury-free processing equipment.							
Indicator	**Baseline Level**	**Level in 2nd PIR (self-reported)**	**Midterm Target**	**End of Project target**	**Midterm Level & Assessment**	**Achievement Rating**	**Justification for Rating**
Four (4) new partnership mechanisms established at national level with funding for sustainable management solutions for mercury elimination at ASGM	No new partnerships with funding for sustainable management solutions of chemicals and waste established yet.	30% against end of project objective is achieved. An assessment of the accessibility of financial products to the artisanal gold miners and organizations was conducted. The baseline report was completed.	2 new partnership mechanisms with funding for gender friendly and sustainable management solutions of chemicals and waste established at national and/or subnational level.	4 new partnership mechanisms with funding for gender friendly and sustainable management solutions of chemicals and waste established at national and/or subnational level.	36% against end of project objective is achieved. No new partnership mechanisms have been established. Consultancy on financial products completed. Prototype has been developed.	Moderately Satisfactory (MS)	Project currently engaging finance entities through consultative meetings and trainings to develop/expand their products to include ASGM sector. Consensus with SMEP Microfinance Bank Limited and memorandum of understanding prepared.
130,000 direct project beneficiaries (65,000 females and 65,000 males) for which the risk of mercury exposure has been reduced.	Inhabitants in pilot counties (□130,000): County: Migori Sub-districts: Masara: 14,530 Osiri: 11,938 Kehancha: 16227 County: Narok Sub-districts: Lolgoria: 5,664 County: Kakamega Sub-districts: Lurambi: 45,577 Khayega: 17,614 County: Vihiga Sub-district: 18,452	40% against end of project objective is achieved. A total number of 2,785 persons (1,169 women and 1,616 men) have been reached through project trainings, workshops, and field activities and awareness creating activities on the dangers of mercury, the need to formalize the sector and the process to apply for permits, how to keep records and available financial products in the market.	65,000 direct project beneficiaries (32,500 female and 32,500 male) for which the risk of mercury exposure has been reduced.	130,000 direct project beneficiaries (65,000 females and 65,000 males) for which the risk of mercury exposure has been reduced.	40% against end of project objective is achieved. A total number of 2,785 persons (1,169 women and 1,616 men) have been reached through project trainings, workshops, and field activities and awareness creating activities.	Moderately Satisfactory (MS)	Generally, the awareness level is very high on effect of mercury use on environment and health. Project has good visibility.

"For sure we know that mercury is dangerous to our health and environment but currently we have no other alternatives. We cannot say that planet Gold has succeeded in eliminating mercury they provide us with alternative processing techniques. A key challenge to the success of the intervention is to get our members to start aggregating ores and processing jointly through cooperatives.

A FGD participant during the MTR

Component 1: Strengthening Institutions and the Policy/ Regulatory Framework for Mercury-free ASGM

- *Outcome Indicator 1.1*: The major outputs are: the trainings and workshops provided to the 4 institutions as part of their capacity-building efforts, which will include gender sensitization, leadership, and child rights training; conduct awareness and skills training for county-level mining institutions to promote diversity.
- *Outcome Indicator 1.2*: Under this indicator: the existing ASGM policy and regulatory frameworks will also be assessed in light of gender dimensions; Policies, regulations, and standards will be revised and/or developed while mainstreaming gender dimensions; Gender dimensions will be mainstreamed in the participatory local government regulations on ASGM and mercury use that will be developed with project support; and finally, technical guidance on mercury-free methods of gold extraction and tailing management will contain gender dimensions.

Table 9: Progress towards results-Component 1- Outcome 1

Project Strategy	**Outcome 1:** Strengthening institutions and the policy/ regulatory framework for Mercury-free ASGM.						
Indicator	**Baseline Level**	**Level in 2nd PIR (self-Reported**	**Midterm Target**	**End of project Target**	**Midterm Level & Assessment**	**Achievement Rating**	**Justification for Rating**
Outcome Indicator 1.1 National and local systems have the capacity to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector.	County Mining Committees not operational as the requisite regulations for their functioning not yet in place. A mining committee has already been formed in Kakamega, however mining committee in Migori still needs to be established.	50% against end of project objective is achieved. The four County Mining Committees (Kakamega, Vihiga, Migori and Narok) have been gazetted. Stakeholder engagement strategy, capacity needs assessment and training manuals produced.	Capacity of 2 government entities increased to improve their capacity to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector.	Capacity of 4 government entities increased to improve their capacity to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector.	50% against end of project objective is achieved. A stakeholder engagement strategy has been developed.	Satisfactory (S)	The project has done well in establishing mining groups. Stakeholder engagement strategy, Capacity needs assessment and training manuals and plans were developed. Various trainings and workshops conducted at national, county and project site levels.
Outcome Indicator 1.2: Enabling	Mining Act 2016 provides for ASGM but	50% against end of project objective is achieved	3 guidelines, standards and incentives	6 guidelines, standards	50% against end of project	Satisfactory (S)	The project reviewed and identified gaps in

environment created through improved national policies and regulatory frameworks for ASGM and mercury phase-out in the ASGM sector	regulations to make it operational are yet to be put in place/developed. Draft Mining Policy and Minamata Convention NAP are being finalized.	Project partners reviewed and identified gaps in existing policies and regulations that would be barrier to mercury -free ASGM, two guidelines and one regulation were recommended as urgent. The project has developed; 1. Health, Safety and Environment regulations, 2. Health, safety and environment guidelines, 3. Guidelines for delineation of land licensing of artisanal miners.	revised and/or developed to improve the enabling environment for ASGM and mercury phase-out in the ASGM sector.	and incentives revised and/or developed to improve the enabling environment for ASGM and mercury phase-out in the ASGM sector.	objective is achieved		existing policies and regulations that would be barrier to mercury -free ASGM, two guidelines and one regulation were recommended as urgent. The project has developed; Health, Safety and Environment regulations; Health, safety and environment guidelines; Guidelines for delineation of land licensing of artisanal miners. Various guidelines are drafted.

During the MTR, the following notable achievements were noted- in relation to component 1 of the project:

i. The relevant government agencies have benefited from several sensitization sessions on ASGM and the impacts of mercury use, both at the National Level, and the county level. This is critical in mainstreaming the sector into their plans.

ii. The Artisanal Mining Committees that are in charge of vetting applications for artisanal mining permits are in place and benefitted from induction programs supported by the project.

iii. The project has delivered several consultancy assignments giving useful information on Gold Mercury Mass balance, gender dimensions of mining, access to finance among others. The reports will guide interventions toward mercury-free technologies, and gender mainstreaming in ASGM.

iv. As part of creating an enabling environment through policies and frameworks, the project has supported the State Department of Mining, as well as the National Environment Management Authority in the development of several guidelines and regulations key among them:

   - Guidelines for health and safety for ASM
   - Guidelines for delineation of ASGM areas
   - The Terms of reference for the development of Mine health and safety regulations have been submitted to the PMU

As part of Co-Financing by the UNDP Environmental Governance Project, the following guidelines were developed:

- Guidelines for Environmental and Social Impact Assessment for the Mining Sector
- Guidelines for Mine Site Decommissioning and Rehabilitation

Generally, in regard to this component, the project is on track to achieve its targets.

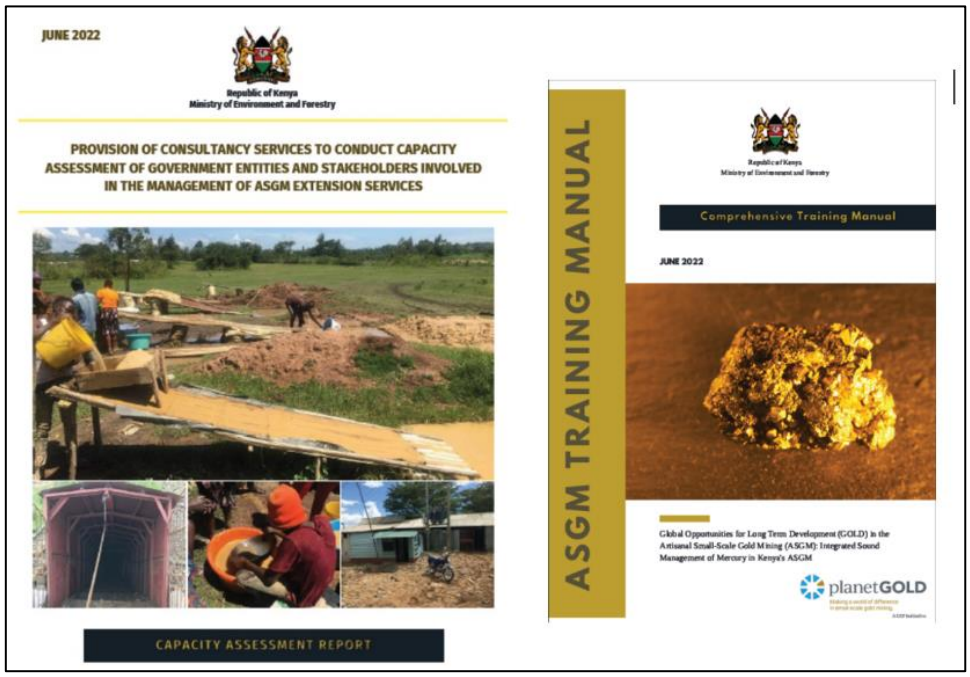


Figure 5: Some of the documents produced by the project

Component 2: Establishing financing lending arrangements/revolving funds to provide loans for mercury-free processing equipment

This component has 2 main outcome indicators, as summarised below:

I. *Outcome Indicator 2.1:*The key elements of this indicator are: Existing financial products of project partners will be assessed in terms of accessibility and suitability for women mining groups; Staff of the financial entities will be trained in the (re)design of these financial products so they suit women and men mining groups' needs; New financial products will be launched that meet the need of women mining groups, while the awareness of women miner groups will be increased on the availability of various incentives and loan facilities that meet their needs (through awareness raising events).

II. *Outcome Indicator 2.2:* At least 4 women mining groups, and mining groups containing women, will be trained in developing loan/investment applications (incl. undertaking technical and financial feasibility studies and record keeping and reporting).

The rating for this component was given based on the progress of the project toward securing financial support to the ASGM sector. Though the mid-term target was not met at this time, there are major strides to achieve the end-of-project targets.

To this end, consensus was reached between MoECCF and SMEP Microfinance Bank Limited and a memorandum of understanding was prepared. The aim is to appoint SMEP as the fund manager for the grant funds available to ASM in the project areas. And SMEP will further make available and accessible customized and competitive

loan and savings products to ASGMs to facilitate upgrade, acquisition and use of safe technologies/alternatives in the gold processing activities.

A prototype was also developed to enable the Artisanal and Small-scale Gold Miners get financial access to invest in mercury-free gold mining activities. Two products were proposed for the same. The first product aimed to provide access to financial support to artisanal miners to enable scaling up mining activities, safety and health measures and personal development. And the aim of the second product is to avail financial support to mining groups wishing to invest jointly.

The progress towards achievement of the outcome has been summarised in the table below:

Table 10 Progress Towards Results: Component 2- Outcome 2

Project Strategy	**Outcome 2:** Assessment of Existing Financial Products, Development of new products, and availability of financial products that meet needs of women in mining.						
Indicator	**Baseline Level**	**Level in the 2nd PIR (Self-reported)**	**Midterm Target**	**End of Project Target**	**Midterm Level & Assessment**	**Achievement Rating**	**Justification for Rating**
Outcome Indicator 2.1: Loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners/cooperatives/ associations.	No formal financial products/mechanisms are currently available, because i) ASGM is considered a high-risk activity; and ii) ASGM was illegal until the 2016 Mining Act came into force. As such formal financing entities were not able to serve the ASGM sector before 2016. Financing products are available to individuals/cooperatives/associations for other livelihood sectors and are at times diverted to ASGM.	No new/improved financial products/mechanism established. An assessment of the accessibility of financial products to the artisanal gold miners and organizations was conducted and the baseline situation documented. -Asset Based Financing -Working capital facility Are recommended. The project has trained 182 miners. The PMU is engaging UNDP country office on access and rolling out of the conditional grant of USD 500,000.	1 new financial product/mechanism (including women friendly financial products) established for the ASGM sector. 1,000,000 USD (Total amount of funding) available to the ASGM sector through existing/new financial mechanisms.	2 new/improved financial products/mechanisms (including women friendly financial products) established for the ASGM sector. 2,700,000 USD available to the ASGM sector through existing/new financial mechanisms. 960,000 USD allocated to the ASGM sector through approved loans.	No new/improved financial products/mechanism established. A prototype was developed. Two financial products are proposed for the ASGM sector.	Moderately Satisfactory (MS)	Consensus reached between MoECCF and SMEP and Memorandum of understanding prepared to manage the grant funds available to ASM in the project areas. SMEP will make available and accessible customized and competitive loan and savings products to ASGMs. The reason for the delay is the unresolved issues in the formalization process.
Outcome Indicator 2.2: 18 ASGM cooperatives/ associations (of which 4 are women led and 14 are	0 miner cooperatives/associations have been trained in accessing financing as no formal loan facilities that	30% against end of project objective is achieved the existing miner groups and mining associations have been made aware	9 miner cooperatives/associations (of which 2 are women led and 7 are men lead)	18 miner cooperatives/associations (of which 4 women are women led and 4 are men led) trained in developing a	36% against end of project objective is achieved No loan applications were	Moderately Satisfactory (MS)	The existing miner groups and mining associations have been made aware of the mining formalization plans in Kenya, non-use of mercury in ASGM

men led) are capacitated to apply for loans for mercury-free processing equipment/investments.	serve the ASGM sector exist. The limited availability of production records limits miners' access to financing. 0 applications for ASGM financing have been developed/submitted as there are not ASGM financing mechanisms in place.	of the mining formalization plans in Kenya, non-use of mercury in ASGM and received some basic training on business management and record keeping. No loans application has been developed so far. 65 groups have been registered.	trained in developing a loan/investment application (incl. undertaking technical and financial feasibility studies). 9 loan applications developed (with technical support of the project).	loan/investment application (incl. undertaking technical and financial feasibility studies). 18 loan applications developed (with technical support of the project).	developed with the support of the project.		and received some basic training on business management and record keeping.

Key Observations during the MTR Process

An assessment of the accessibility of financial products to the artisanal gold miners and organizations was conducted and the baseline situation documented. A report titled "***Baseline Survey for the Selection of Two finance entities to Partner with the Project and Assess the Accessibility of their financial products"*** has been prepared. The report identifies models that can be used to include: Asset Based Financing, and Working capital facility.

The project envisions establishing partnerships with finance entities and building their capacity and understanding to develop financial products tailored for the sector. The financial entities will better assess loan applications from miners and work with miners' cooperatives to build their organization in developing loan investment applications. Currently, the sector is considered risky; therefore, no financial institution has developed a product explicitly for the ASGM sector. KIIs and FGDs during field visits revealed that the financial institutions are willing to develop products but based on the following conditions (i) The sector is formalized and given relevant documentation by the ministry, and. (ii) there is a model for sharing risks, as has been done for other sensitive sectors like agriculture.

Key informant interviews further revealed that the preferred model for financial products was a Risk Sharing Model where the project provides some funds for onward disbursement. However, the Project document does not envision such a model and therefore no resources were allocated towards the same.

"We have several products for special categories of groups, that we have developed with partners. The bank has previously developed products for sectors like Agriculture, in partnership with other agencies like IFC, USAID etc. The models used have mainly been asset finance where the bank pays service providers directly for a particular service like equipment delivered to the target beneficiaries. However, there should be a model of risk sharing so as to cushion the bank. In some partnerships, the partners have availed funds to the bank for onward lending to the target sectors. Some projects have been so successful that the bank has pumped in more money to support the same" **Participant from Financial Institution KIIs**

The field surveys also reveal that some groups of miners have benefitted from financial training sessions and are already keeping records as part of preparatory works for access to finance.

However, the aspect of financial literacy by miner groups needs more sensitization and training. The training component for the finance institutions need to be fast tracked if the process is to be successful.

Figure 6: Record Keeping at Vihiga Artisanal Mining Cooperative Society Ltd

So far, no loan application has been developed, thus the project is behind schedule on this component. The component would benefit from more capacity building on the element of access to finance.

Component 3: Increasing capacity for mercury-free ASGM through provision of technical assistance and technology transfer

This component has 3 broad outcome indicators as summarised below:

I. *Outcome Indicator 3.1:* The socioeconomic baseline surveys and mercury/gold mass balance inventories conducted for each of the 6 priority project sites. The baseline will also collect sex-disaggregated data of the mining groups selected for project participation. At least 4 selected groups will contain women miners or be women mining groups that will be supported in formalization efforts and in improving ASGM practices; The comprehensive ASGM training curriculum to be developed with project support for training miners (men and female), will contain gender aspects, and contain a module on gender in ASGM. This will encourage a culture change in how women are being viewed in the mining sector; Women mining groups and women miners will also receive separate leadership training.

II. *Outcome Indicator 3.2:* Of the project mining groups supported in their formalization efforts[16], at least 4 will contain women miners or be women mining groups; The project will also support women groups interested in mining in the establishment of ASGM associations/cooperatives.

[16] gaining access to legal subsurface rights, obtaining a permit to establish/operate a processing plant; designing processing and waste management plan

III. *Outcome Indicator 3.3:* At least 1 partnership established with an international refiner, a local bank, and a fund transfer/holding agent; Establish a partnership with a gold certification organization to assess top-performing project mining groups for possible certification.

Based on the report "*Selected Project Groups and Sites, Mining Associations and their Demonstration/Processing Sites and PlanetGOLD Mercury-Free Processing and Gravimetric Training Plants, November 2022"* prepared by the CTA, the project has selected 16 Mining Associations Demonstration Sites. Two(2) more will be established to make the required 18 as per the ProDoc, to realize mercury reduction by establishing 1 mercury-free processing plant and 6 gravimetric plants in the four counties.

The demonstration sites were selected based on a predefined set of criteria and the immediate actions to follow were highlighted.

Training was also provided for the selected mining groups on:

- Basic training on mercury and its impacts on health
- Training on genders issues in mining
- Training on investment opportunities within the mining value chain, including opportunities that women can capitalize on.
- Sensitization on marketing- the need for marketing as a group

Though there is some progress towards achieving component 3, the indicators set for this component indicate the number of formalized mining groups, total mercury use/release avoided, and amount of mercury-free gold sold to the market. In this regard, the rating for this component was given based on the fact that the mid-term targets were not met. The formalization process is not yet finalized, mercury reduction has not started and the market link for mercury-free gold not been established.

The progress of the outcomes has been summarised in the table below:

Table 11 Progress Towards Results: Component 3- Outcome 3

Project Strategy	**Outcome 3:** Increasing capacity for mercury-free ASGM through provision of technical assistance and technology transfer						
Indicator	**Baseline Level**	**Level in 2nd PIR (Self-reported)**	**Midterm Target**	**End-of-project Target**	**Midterm Level & Assessment**	**Achievement Rating**	**Justification for Rating**
Outcome Indicator 3.1: 1.5 tonnes of mercury avoided through the introduction of BEP, BAT and socially and environmentally sound ASGM practices	2 tonnes are released annually from the ASGM sector in Kenya	Mercury use/releases avoidance not yet realized with project facilitation. Project activities are still at the identification of mercury-free processing technologies step.	Mercury use/releases from ASGM avoided by 1 tonne. 240 kg of gold produced without mercury.	Total mercury use/releases from ASGM avoided by 1.5 tonnes. 480 kg of gold produced without mercury.	Mercury use/releases avoidance not yet realized with project facilitation.	Unsatisfactory (U)	Project activities are still at the identification of mercury-free gold processing technologies. The project is not moving as planned to realize mercury reduction. The reason for the delay is reportedly the challenges in the

		Evaluation of Ore assays and selection of appropriate technology to be in place by Dec 2022.					formalization process.
Outcome Indicator 3.2: 1,600 ASGM miners (of which 1/3 women miners) supported in their formalization processes leading to more sustainable income opportunities and safer working conditions.	Since enactment of the 2016 Mining Act ASGM has become legal, however miners require licenses and permits which they can only obtain if they are registered. Registers for ASGM miners, which is the responsibility of the County Artisanal Mining Committees, are not in place yet. A County Artisanal Mining Committee has already been formed in Kakamega, however the one in Migori still needs to be established. The requisite legislation has been developed but appointment of the officers to chair these County Artisanal Mining Committees is yet to be done by the County governments.	The formalization process is being supported by the state department for mining. The state department for Mining has established the committees to review, consider and recommend issuance of licenses and has update the cadastre to allow artisanal miners an opportunity to apply for licenses. The draft guidelines are to support the processing of formalization and enable the enactment of the Mining Act 2016.	At least 800 miners (of which 1/3 women miners) supported in their formalization processes.	At least 1,600 miners (of which 1/3 women miners) supported in their formalization processes.	No artisanal and small-scale mining group has been formalized.	Moderately Unsatisfactory (MU)	The mining groups are in the process of registering cooperatives, some have concluded the process. The project selected 16 Mining Associations, 16 Demonstration Sites . 2 more will be established to make required 18. The project identified technologies for training. Process of issuance of mining permits curtailed by moratorium in place.
Outcome Indicator 3.3: Route to market for mercury-free gold improved/established.	Fair Trade is working with ASGM communities on establishing mercury-free markets. Market linkages have been established but no sales have taken place yet. The initial processing audit of some of the members has been completed.	Mercury-free processed gold not yet produced with project facilitation. Project activities still at the identification of mercury-free processing technologies step	100 kg of mercury-free gold sold to the formal market	240 kg of mercury-free gold sold to the formal market.	Mercury-free processed gold not yet produced with project facilitation.	Unsatisfactory (U)	No route to market for mercury-free gold established/improved yet.

Component 3 is key to achieving a reduction of mercury emissions, which is the overall objective of the project. The main objective is to eliminate the release and use of mercury in participating ASGM groups, by supporting the mining communities in the adoption of alternative gold ore processing methods which utilize less or preferably no mercury. The project will do this by building the capacity of ASGM mining communities in the use of mercury-free alternative technologies, as well as the application of socially and environmentally sound ASGM practices (e.g., sound management of mining tailings). However, this component is yet to take off since the formalization process is not finalized yet. There exist some initiatives towards technology provision for mercury free processes by other stakeholders, which may offer key learning points for the IMKA project.

In general, the project has sensitized miners in the target counties to register cooperatives as the first step towards formalization. From the PIR, as part of formalization (outcome indicator 3.2), several mining groups have pursued registration process. In Kakamega Rosterman, four groups (Mwangaza Mining CBO, Muungano Mines Group, Rosterman Gold Dust Group), at Ikholomani nineteen (19) groups, Vihiga six (6) groups, Migori Osiri seventeen (17). Masara twelve (12) groups, Kehancha ten 10) and Narok Lolgorian fourteen groups have been registered by social services.

It is envisioned that through Technical Assistance and Technology Transfer, at least 1,600 miners a third of whom should be women, will participate in interventions, or about 260 miners from each intervention site. However, Outcome Indicator 2.2: envisions that 18 mining associations/cooperatives (of which 4 are women-led, and 14 men-led) are capacitated to apply for loans for mercury-free processing equipment/investments. This component shows inconsistency in the indicators, thus need to choose either groups (18) or individuals as the unit of measure. The selection of the 18 participating groups is yet to be formalized, thus the need to fast-track the process.

Figure 7: A miner using Mercury during Panning in Kehancha

It's important to note that formalization in the context of mining entails the acquisition of various permits that bestow the mineral rights to the individual or the group. The main

applicable permits/licences for ore productions are Artisanal Mining Permit, Small Scale Mining licence. Fore Ore processing and selling, a dealer/processing licence applies. This is yet to happen as the government is enforcing a moratorium on the issuance of new mining permits and licenses. Further to this, most of the ASGM activities are in concession areas belonging to large scale mining companies. This is a big technical hitch in the formalization process. The component of demonstration sites is, therefore yet to be implemented.

"As a person doing sluicing, I would request that we have a common place for sluicing our ore. Whatever we get from the aggregated sluicing, will be shared by the group.

Female participant in the FGDs with miners

"The challenge we have is that we work in other peoples' mines. We need to own our mine as a group. **Participants of FGDs with miners**

Key informant interviews with various stakeholders highlighted these risks, and identified the alternative of acquisition of **dealer processing licenses** for the groups as the technicalities around mining permits are being addressed. The shift to dealer processing licence, is also ideal since the main project focus in on **mercury free processing**. However, this process was yet to commence as at the time of the MTR. The project should fast-track facilitation of registered cooperatives among the 18 groups to apply for dealer processing licence as may be applicable.

Consequently, Outcome 3.1 is yet to be implemented, but was due for implementation starting year 3. However, from interaction with miners and other stakeholders, the following gaps/challenges were observed;

i. There seem to be miscommunication between the project team and mining groups relating to the number of pilot sites for technology to be supported by the project. This has contributed to false expectations from the miners.

ii. There was an agreement on the need for sampling and conducting of assay tests so as to guide design of appropriate technology. This is yet to be undertaken.

iii. The element of data collection to determine volumes of Gold production which is critical in determining overall emission reduction is also not well developed. Currently, there has been no record of gold produced without mercury.

The PMU, with the assistance of CO and RTA, has been learning from and exchanging experience with other planetGOLD countries on viable alternatives. The CTA has prepared a report on proposed mercury free technologies that can be used in the different target sites. This component need close consultation and engagement with the SDoM.

Critical to the success of this component is Output 3.1.13 - 30 Trainers (selected from project partners, mining communities and training centres) trained in the application of training resources (existing and new) and the use of the equipment at ore processing plants and laboratory installations. This is yet to be initiated, thus the need to fast-track the component to run concurrently with acquisition of technology. It is equally important to note that by this time the technical specification for technology should have been prepared so as to facilitate initiation of procurement process. In relation to this component, the project therefore is off Track.

To address the challenge, the following measures should be considered:

i. Accelerate process of developing technical guidelines for the technologies so as to start off procurement process
ii. Initiate procurement of Technology by UNDP through the Rapid results Initiative so as to reduce the turnaround time
iii. Facilitate officers in state department of mining with training on BAT in preparation for the technologies
iv. Fast-track Output 3.1.14 - 100 miners trained by trainers at existing plants and laboratory installations using existing and newly developed training materials and resources.

Component 4: Monitoring and evaluation, awareness raising, capturing and disseminating experiences, lessons learned and best practices

The component had 3 key outcome indicators as summarised below:

I. *Outcome Indicator 4.1:* The awareness raising plan that will be developed and implemented as part of the project will contain important elements related to gender. The project's gender expert will ensure that the developed awareness raising plan and its activities meet the needs of female and male miners.

II. *Outcome Indicator 4.2:* The project will conduct a Gender Assessment of project impact as part of the Mid-Term Review. Based on the results of the Gender Assessment and other recommendations coming out of the MTR, the project might further improve its gender related interventions. Independent Mid-term review and Terminal Evaluation conducted.

III. *Outcome Indicator 4.3:* On a quarterly basis, project results and information on project progress will be communicated to the GEF GOLD global component. The project's gender expert will support the project in identifying gender specific results and how to present these in reports and publications that summarize results, lessons-learned, best practices and experiences. Information on project progress contain gender specific results (using agreed metrics and templates provided by the GEF GOLD global component where appropriate) submitted to the GEF GOLD global component.

Figure 8: Advertisement in Vihiga County about risk of mercury

The progress for each outcome area has been summarised in table below:

Table 12: Progress Towards Results: Component 4- Outcome 4

Project Strategy	**Outcome 4:** Monitoring and evaluation, awareness raising, capturing and disseminating experiences, lessons learned and best practices						
Indicator	**Baseline Level**	**Level in 2nd PIR (Self-reported)**	**Midterm Target**	**End-of-project Target**	**Midterm Level & Assessment**	**Achievement Rating**	**Justification for Rating**
Outcome Indicator 4.1: Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM.	The project has raised awareness of 0 people on the dangers of mercury and ways to reduce its use in ASGM.	40% against end of project objective is achieved. Information, education and communication material procured and distributed to project beneficiaries. All consultative meetings, field missions, workshops, identification and mobilization of miners and trainings included a component on awareness raising on dangers of Mercury. All beneficiaries reached within the reporting periods. A total of 2785 beneficiaries reached.	Awareness raised of 27,300 people (8,190 female and 19,110 male) on the dangers of mercury and ways to reduce its use in ASGM.	Awareness raised of 54,600 people (16,380 female and 38,220 male) on the dangers of mercury and ways to reduce its use in ASGM.	40% against end of project objective is achieved	Moderately Satisfactory (MS)	Information, education and communication material procured and distributed to project beneficiaries. All project activities include awareness creation. All beneficiaries reached within the reporting periods. A total of 2785 beneficiaries reached.
Outcome Indicator 4.2: M&E and adaptive management applied in response to needs and Mid-Term Evaluation findings.	0 GEF M&E requirements met by the project.	30% against end of project objective is achieved A project monitoring and evaluation matrix is in place. MTR is yet to be done.	15 of GEF M&E requirements met and adaptive management applied in response to needs and Mid-term Evaluation (MTE) findings.	38 of GEF M&E requirements met and adaptive management applied in response to needs and Mid-term Evaluation (MTE) findings.	30% against end of project objective is achieved	Moderately Unsatisfactory (MU)	A project monitoring and evaluation matrix is in place. MTR is just conducted.
Outcome Indicator 4.3: Project results, experiences, lessons-learned and best practices are captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and global dissemination, u sing report templates provided by	0 project results, experiences, lessons-learned or best practices are captured, published, and taken up by the GEF GOLD Global Disseminati on Platform.	70% against end of project objective is achieved The webpage was developed and is up to date. All project activity-based reports challenges with lessons learned have been compiled and shared through the project social media handles, and the PlanetGOLD global platform. The project management unit participates in regular	1 GEF GOLD country project webpage (using the template developed by the Global Gold Project) maintained. Country project participated on a yearly basis in 1 Global ASGM Forum (3 in total), 1 Annual Programme Conference, and 12 monthly programme/proj ect calls.	1 GEF GOLD country project webpage (using the template developed by the Global Gold Project) maintained. Country project participated on a yearly basis in 1 Global ASGM Forum (3 in total), 1 Annual Programme Conference, and 12 monthly programme/project calls. Opportunities for communication of	70% against end of project objective is achieved	Highly Satisfactory (HS)	Webpage was developed. All project activity-based reports including challenges with lessons learned have been compiled and shared through the project social media handles, and the PlanetGOLD global platform.

the GEF GOLD global component where appropriate.		meetings with the global programme. Information on project progress shared with global component on quarterly basis.	Opportunities for communication of project activity results at a global level are identified on a quarterly basis in collaboration with the GEF GOLD global component. On a quarterly basis, information on project progress (using agreed metrics and templates provided by the GEF GOLD global component where appropriate) is submitted to the GEF GOLD global component.	project activity results at a global level are identified on a quarterly basis in collaboration with the GEF GOLD global component. On a quarterly basis, information on project progress (using agreed metrics and templates provided by the GEF GOLD global component where appropriate) is submitted to the GEF GOLD global component.			

On outcome 4.1, the project has made major strides in creating awareness on the dangers of mercury use. Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM. The field visit reveals that there is high level of awareness among the miners. However, the following suggestions were given:

i. Need to provide materials for participants so that they can share the same with the members of their groups

ii. Need to break down the trainings so as to enhance absorption by the miners. there were claims that some sessions were too technical

Remaining Barriers to Achieving the Project Objective

After assessing and rating the performance of the project in regard to realizing the expected outcomes and outputs, the MTR team identified the following remaining barriers/challenges to achieving the project objective in the remainder of the project time frame.

i. The long bureaucracy to unlock the budgeted finance from the national treasury for the planned activities.

ii. The project proposed regional offices but never factored in the establishment of the offices. Mining being diverse and covering a large area, the project never made provision to acquire vehicles to facilitate movement of the project team. The project has made request to UNDP to facilitate but this is yet to be done.

iii. The formalization process is not yet finalized due to licensing issues in the selected project sites for ASGM practice. The artisanal mining committees are in place, but yet to start delivering their mandates.

iv. Lack of effective monitoring and evaluation and feedback mechanism. M&E should be conducted in collaboration with the counties and SDoM to utilize the government resources properly and increase performance.

v. Delay in developing financial instruments and mechanisms to support the ASGM sector. The financial institutions require a guarantee fund to provide financial products to the miners.

Project Implementation and Adaptive Management

The MTR team has thoroughly reviewed the project implementation and adaptive management of the project. The MTR has identified key challenges in implementation and proposed additional measures to support more efficient and effective implementation for the way forward.

Management Arrangements

The MTR team assessed the quality of UNDP support to the project and the Executing Agency/Implementing Partner's execution of the project. The MTR team compared current management arrangements with arrangements laid out in the Project Document and assessed whether changes had been made and were effective or not. The team also evaluated whether responsibilities and reporting lines were clear and checked if the decision-making process was transparent and undertaken in a timely manner. Based on the assessment criteria set for the evaluation of the effectiveness of the management arrangements the MTR team found the following:

i. The IMKA Kenya project is being implemented within the framework of UNDP's National Implementation Modality (NIM), according to the Standard Basic Assistance Agreement between UNDP and the GoK. But this modality is not effective due to the long bureaucracy in the government structure. There are significant delays in decision making and resource flow thus affecting the project implementation progress.

ii. During the MTR process, it was observed that the MoECCF was not much effecient in project implementation. The ministry should have effectively facilitated the SDoM as a Responsible Party to take the lead in components under its mandate such as formalization, technical support, and technology transfer.

iii. The main challenge in project management is the delay in the formalization process since the mining sites are under concession by private mining companies. There also exists a moratorium on the issuance of new mining licenses and permits. However, this can be circumvented through the issuance of dealer processing license, since mercury is used in processing, and not mining per se. This will be a stop-gap measure as the issue of zoning for ASGM sites is addressed, as well as lobbying for the lifting of moratorium.

iv. The PSC has not taken an active role in the timely addressing of project challenges. The PSC should take an active role in progress monitoring, and strategic guidance, to quickly identify and address the challenges that have hindered the effective function of the TAC, PMU, and overall project execution.

v. The PMU, has not effectively made use of responsible parties, nor facilitated them to execute the project activities in a timely manner. This has led to delayed activities, as well as reduced sense of ownership by different partners. There is need for more engagement of RPs, and greater delegation of functions as per agreed work plans. This will allow the PMU to play a coordination and facilitative role, rather than an implementing role. The inefficiency of the PMU was mentioned by different stakeholders as a barrier to project success.

vi. KIIs with stakeholders point out that the PMU seemed to have differences among the members, thus affecting its overall functioning and ultimately overall project implementation.

vii. The PMU's efficiency has been greatly hampered by delays in approval of budgets and release of funds by GoK. this creates a ripple effect in terms of delays in confirmation and timely implementation of activities.

viii. TAC is a key decision-making organ of the project, and meets quarterly to review progress and plan for activities. KII with TAC members revealed that there is a disconnect between the TAC and PMU. In most cases, TAC decisions made during the meetings are rarely implemented on time. Follow up for non-implemented action points is also weak, therefore rendering the TAC ineffective. Timely communication between PMU and TAC was also cited as a key challenge.

ix. The ProDoc identified to establish two sites level liaison offices to coordinate activities for pilot demonstrations in western Kenya (Kakamega and Migori Counties). The regional officers never relocated to the regions. This has caused the challenges in liaison between national offices and the county offices and affected the overall project coordination, reducing efficiency and thus delayed implementation of planned activities. The project currently does not have the regional officers, since one was promoted to the position of CTA, while another resigned from his position. KIIs pointed to the need to make use of the regional mining offices, and to have the regional Mining Officers second a staff to handle the functions that could have been handled by the regional officers.

The MTR team has found that the management arrangement has key challenges that have affected overall project efficiency. There seems to be a lot of finger pointing among the different cadres of project staff, thus challenges with enforcing accountability. This calls for a strengthening of the governance framework for the project to work efficiently. The PMU contracts should be done by UNDP, for increased accountability. Alternatively, the project director should take an active role in streamlining the operations of the PMU, and enforce performance metrics for each staff member.

Work Planning

The MTR team assessed the project's work planning and came up with the following:

a) There was significant delay in the IMKA project start-up and implementation. The planned start date was July 2019 but the project actually started on September 2020 and is in its third year of implementation. The main reasons for late start-up were:

    i. Delays in setting up of project accounts at the National treasury

ii. Late recruitment of the PMU due to the long bureaucracy in GoK. GEF requires to have hired the PM to conduct the inception workshop (PM was hired in 2020); the pull and push by MoECCF and SDoM to host the project. The recruited CTA resigned soon after due to technicalities at his previous workstation.

iii. COVID 19 which affected overall mobilization for inception meetings and fieldwork

b) Some of the key partners who committed to co-finance have since ended their projects (Solidaridad, Fairtrade, CIRDI). This has affected the co-financing components of the project.

c) The work plans are rarely executed in time due to inefficiencies in the PMU, which can also be attributed to the long government bureaucracies in getting approvals and release of funds for project activities.

d) The project team has not effectively engaged key stakeholders like SDoM, who have a critical role in technical support. Key stakeholders like Responsible Parties have not been facilitated to implement their components. There are also administrative challenges that are affecting overall efficiency.

e) In the project design, logistics was not included for the project officers at the site. However, there is a substantive budget rather allocated that can be used for logistics. The pooled transport system used at the project site level is also a challenge. UPOPS had a vehicle and during the final steering committee meeting it was recommended that the vehicle shall remain in MoECCF and be available for the Gold Kenya project. However, this has not been effected. Lack of coordination and maximizing the available human resource is also a challenge.

f) The work planning was not results-based and key stakeholders are not consulted during planning. The KIIs revealed that when key partners request a budget for some activities, they are informed that there is no provision in the ProDoc. The results framework was not strictly used as a management tool and the necessary changes were not made on time. To this end, the MTR team suggests that the PM and TAC members sit and review the annual and quarterly plans and make amendments to allow key stakeholders to do their best in the remaining time of the project.

Finance and Co-Finance

According to the ProDoc, the total project financing is USD 21,074,711. The total budget to be administered by UNDP from GEF Trust Fund is USD 4,200,000 and total co-financing in parallel in-kind contributions is USD 16,874,711 (from Government of Kenya USD 16,000,000 and NGOs/CSOs USD 874,711). As the GEF implementing agency, UNDP is responsible for the execution of the GEF resources and the cash co-financing transferred to the UNDP bank account only. Both GoK and UN financial and procurement procedures will be utilized and adhered to as appropriate. The project will adhere to the Public Financial Management Act (2012). The actual realization of project co-financing will be monitored during the mid-term review and terminal evaluation process and will be reported to the GEF.

The MTR team found that there is a limitation in the finance and co-finance arrangements. The financial system of the GoK is not flexible and it takes much time to unlock the budget for

planned activities due to the long chain of command. As learned from the PMU, it has been difficult to utilize the budget on time and there are still pending payments. The pending reimbursements have generated mistrust between the stakeholders at the county level and the PMU due to several unpaid allowances, despite participants of meetings having signed payment forms. This is affecting their willingness to participate in planned activities.

The GoK has requested UNDP to take over the financial management, especially for the procurement of the alternative mercury-free gold processing technologies. During the KIIs with UNDP staff, the MTR team has learned that UNDP is communicating with GEF on the need for direct implementation modality to allow for greater support to GoK. In the MTR team's opinion, it is a critical issue that needs to be solved as soon as possible to help the project move forward at a better speed and achieve at least some planned activities of component 3 and meet project objective.

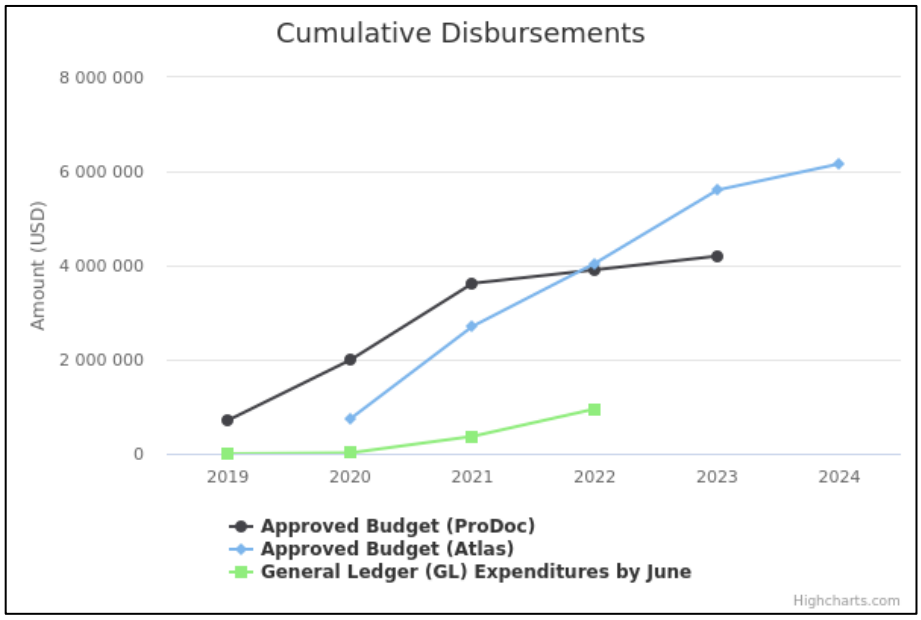


Figure 9: Budget Disbursement as per PIR 2022

The PIR 2022 indicates that the overall financial performance is less than 22.64% against the plan. The financial progress is at only 36.23 based on the financial report from UNDP CO. This shows that the progress from latest PIR is 13.59% during the past nine months. However, the weak financial progress has been acknowledged both the GoK and UNDP.

Table 13: Budget Utilization as per PIR 2022

Cumulative GL delivery against total approved amount (in ProDoc):	22.64%
Cumulative GL delivery against expected delivery as of this year:	24.33%
Cumulative disbursement as of 30 June:	950,716

Table 14: Cumulative budget utilization (Source: UNDP CO)

Source of Funds	Activity Name	Approved Budget (as per ProDoc)	Cumulative Expenses + Commitments	Delivery Rate including Commitments
GEF	Strengthening Institutions	401,500.00	390,008.03	97.14%
GEF	Establishing Financial Mechanisms	1,175,000.00	192,799.81	16.41%
GEF	Capacity Building Mercury Free	1,802,500.00	445,513.02	24.72%
GEF	Monitoring and Evaluation	621,000.00	336,892.46	54.25%
GEF	Project management Unit	200,000.00	61,219.29	30.61%
GEF			13,640.17	
Project Total		**4,200,000.00**	**1,440,072.78**	**34.29%**
Project Total Advances			**81,443.22**	
Project Total (Including= Undepreciated Fixed Assets, Prepayments, Inventory + Advances)		**4,200,000.00**	**1,521,516.00**	**36.23%**

Based on the data provided by the PMU the progress in utilizing the co-finance is less than 1%. This shows that the co-finance element is lagging behind, thus the need to properly engage the GoK and partners to fulfil their co-financing obligations.

Table 15: Summary of co-financing (no data to compare plan Vs achievement)

Sources of Co-financing	Name of Co-financer	Type of Co-financing	Co-financing amount confirmed at CEO Endorsement (US$)	Actual Amount Contributed at stage of Midterm Review (US$)	Actual % of Expected Amount
Recipient Country Government	Ministry of Environment and Forestry	In-Kind	8,400,000	94,713.41	99.41%
	Ministry of Mining	In-Kind	7,600,000		
NGOs/CSOs	CEJAD	In-Kind	152,320		
	CIRDI	In-Kind	119,891		
	ASMNET	In-Kind	195,000		
	MICODEPRO	In-Kind	201,000		
	Solidaridad	In-Kind	206,500		
		TOTAL	**16,874,711**	**94,713.41**	

Project-Level Monitoring and Evaluation Systems

By design the monitoring and evaluation system is good but there are some issues on the budget planning on the ProDoc. For instance, direct finance was not allocated for gender mainstreaming, the budget line is general and was a challenge to conduct gender related

activities that the project requires. Based on the KIIs at the national level the key stakeholders were not consulted during annual and quarter plan preparations. Due to this, the key partners were not able to fully support the project and the PMU was doing the M&E by its staff.

As clearly stated in the ProDoc, the Project Manager is responsible for day-to-day project management and regular monitoring of project results and risks, including social and environmental risks. The Project Manager should also ensure that all project staff maintain a high level of transparency, responsibility, and accountability in M&E and reporting of project results. To this end, the PM was not effective in project follow-up and oversight of the implementation of project interventions. The PM should utilize the results framework and the annual and quarterly plans as a basis for project management, and report the challenges to the PSC, TAC, and UNDP to provide prudent solutions for the successful implementation of the project objectives. This would ensure, the GoK and beneficiaries received the benefits of the project on time and with the desired quality. The PM argues to have reported both to the Ministry and to UNDP CO and RTA on the challenges in implementation and there have been several attempts by UNDP and the PSC to resolve the issues.

Project-level monitoring and evaluation was another key bottleneck for this project's performance. The PM should have engaged the key stakeholders for M&E based on the M&E framework developed for the project. TAC could have been efficient for M&E of the project since most members are professionals with ample experience. The PSC should have done better in follow-up and providing directions based on the reports from the PM. Based on the information provided by the PM, the M&E framework development involved CO and RTA, and the draft was submitted to TAC for validation. The project at some point supported some PMU staff to undertake an M&E training to enhance the process.

UNDP was not also effective in means of verification of monitoring and evaluation of the project interventions on time and with the required depth.

Much has to be done for efficient monitoring and evaluation at national, regional, and project site levels. The regional officers were not effective in M&E. As project staff, they should have been based at the regions, and provide site-based M&E data. According to the PM, the regional officers took the M&E training undertaken by AMREF University.

Besides this, the annual reports produced were not properly shared with the key stakeholders. This made it difficult to obtain the technical support that would have helped for better M&E of the project interventions, as well as making informed decisions on the challenges, and timely actions to bring the project back on track.

Stakeholder Engagement

The PMU, MoECCF, and UNDP need to improve on stakeholder engagement as provided in the ProDoc. Better coordination between the PMU and TAC is required so that the desired outcomes can be realized in the remaining time of the project. There is more to be done to establish public-private partnerships for the successful implementation of the project interventions. The project has done better in awareness creation from national to regional and project site levels. Every stakeholder realizes the impact of mercury on human health and the environment.

The formalization of the ASGM sector, devising finance mechanisms to provide mercury-free gold processing technologies, creating market link for gold produced without mercury and selection of appropriate alternative technologies require participation of relevant stakeholders.. To this end the project management unit is expected to strengthen the partnership with key stakeholders and create synergy among all partners.

The PMU also has to communicate with the co-financing institutions and development partners to secure the promised finance for better implementation of the project outputs and outcomes to realize current and future project benefits.

Reporting

Regarding to reporting mechanisms and effectiveness of reports towards improving project implementation the MTR team found the following:

a) PIRs and progress reports have been delivered based on GEF requirements and UNDP standards. The limitation is on devising a mechanism to solve the issues regarding poorly rated implementation progress presented in the PIRs. Sharing the findings of the reports to key stakeholders will enable every partner to internalize the reasons for poor performance, and work on solving the challenges so as to achieve the objective of the project.
b) Another challenge is in documenting lessons learned from adaptive management process and sharing with key partners. This will enable them internalize the barriers and provide solutions and incorporate in project implementation. In this regard, some lessons learned from the project implementations were shared to GEF GOLD programme and the products are available on the project's web page and GEF GOLD websites. These knowledge products have to be shared with the GoK, development partners, beneficiaries and local community in order to create ownership of the project and to sustain the project benefits.

Communication and Knowledge Management

A communications strategy was developed for the GEF Gold Kenya project. The strategy creates a platform to channel the objective of the project, create awareness for a wide range of audiences and support the implementation process. The goals for the communication strategy are: influencing positive public perceptions, changing finance sector perceptions, supporting widespread knowledge uptake, and building solid communications foundations for the successful implementation of the project interventions, thereby sustain the project benefits.

During the MTR process, it was found that various meetings were held with PSC, UNDP, TAC, Financial Institutions, Chambers Federation for Project Implementation, County Governments, and Artisanal Miners Groups and discussions were conducted about the project interventions.

If the project's communication strategy was used properly it would have helped a lot for better project implementation and on-time delivery of the planned project results. It would have been good if the communications expert of the project was involved in the planning, execution, communications, and M&E of the project for better performance. Developing a communication strategy is one of the strengths of the project. However, more need to be done to build effective communication and feedback mechanisms among the various stakeholders, to ease the flow of information about the project successes, and learn from the failures. This will enable timely

realisation of development challenges, and remedial measures taken for successful implementation of the project outcomes, outputs, and eventually make sure project objective is met during the project life.

The project has hired a communications expert under the PMU. Various knowledge management products were developed by the project and some of them have been shared with the Global planetGold Programme. The knowledge products have been shared on social media. Using national and private broadcasting agencies would be better to medium to disseminate the knowledge products in order to reach a wider audience and attract the attention of the GoK, and development partners, and most importantly create awareness to local people. Most stakeholders can access radios more easily than other means of communication. As learned from the KIIs with the PMU staff logistic and financial support is also appreciated to document the knowledge products. It would have been better if the PMU has its own website rather than using a webpage under the website developed for MoECCF.

Sustainability

The aim of the assessment of sustainability at the midterm level is to consider the risks that are likely to affect the continuation of project outcomes. To this end, the MTR team assessed the sustainability issues that are impacting the project progress and identified continued sustainability risks that will impair the project benefits after the project phase-out. In this regard, the risks identified in the ProDoc are the most important and the risk ratings applied are appropriate and up-to-date. However, the ProDoc should have dug deeper to consider the risks of mercury use on the surface water and groundwater system of the project areas. The Financial, socioeconomic, Institutional Framework, Governance and Environmental risks to sustainability are discussed in the following subsections.

Financial Risks to Sustainability

Before discussing the financial risks once, the project phase-out it will be wise to mention the challenges on financial management during the project implementation. The PMU is not able to disburse the budget allocated for the activities on time, due to bureaucracies associated with the Integrated Financial Management System operated by the GoK. This has been a key bottleneck, thus affecting the overall NIM modality due to unforeseen delays.

Different stakeholders felt that there would be greater efficiencies if UNDP took control of the overall financial management, especially for heavy components like procurement of alternative technologies. This can also easily facilitate the allocation of funds for the key stakeholders (responsible parties) so that the project activities can be implemented and the required results of the project delivered on the remaining time of the project.

Regarding financial risks to sustainability, after GEF support ends, the financial instruments are not yet devised. Although there are discussions with financial institutions, the key challenge mentioned by the institutions is the informal nature of ASGM, and the lack of a risk-sharing modality. To this end the GoK can play a major role in providing leverage for the banks. As learned from the discussions on the KIIs with UNDP neither GEF nor UNDP can share the financial risks once the project ends.

Once the formalization process is completed and the required alternative environmentally friendly gold processing technologies are in place, there is an issue of operation and maintenance that cannot be affordable for the ASGM, especially at the beginning of the operation. Therefore, creating a market link for gold produced without mercury and developing of an exit strategy are keys to addressing the financial risks to sustainability.

Therefore, it will be wise to strengthen the capacity of the ASGM groups and associations that are being established through consultation with MoM, Cooperatives, and microfinance institutions.

Socio-economic Risks to Sustainability

The awareness creation campaigns and the trainings conducted by the project created a common understanding about the dangers of mercury at national, regional and local levels. The MTR team found that there are concerns on the ownership of the project at national and regional levels. The ownership at project site level is encouraging but the challenges on the formalization process and the efficiency of the project implementers in delivering the expected outputs is creating frustration.

The key challenge in the formalization process include: The moratorium on Issuance of new licenses and permits, and availability of areas with unallocated mineral rights. Most of the ASGM areas are already under concession to large scale mining companies.

As indicated in the ProDoc the formalization process is the first critical step for realization of the project outcomes and sustaining the project benefits. Without formalizing the ASGM sector and giving the necessary permit to function as a legal entity, implementation of component 2 and 3 remain a challenge.

Institutional Framework and Governance Risks to Sustainability

The project was expected to make use of the existing government structure for the successful implementation of the project interventions. However, the PMU has not capitalized on this element, thus most of the institutions at field level have no clarity on what exactly is expected of them by the project. Therefore, building the capacity of government institutions and greater engagement in project activities can guarantee project ownership and sustainability of project benefits. There is progress on policies and legal frameworks to enable the project function but a lot of effort is also needed in this regard to alleviate the institutional framework and governance risks to sustainability. To this end the SDoM requested for better support and facilitation, so as to address the issue of formalization and timely deployment of technologies.

Environmental Risks to Sustainability

The project is designed to ensure sustainable development by reducing/eliminating mercury use to avoid its negative impacts on human health and the environment. This is planned to be achieved through awareness creation about the dangers of mercury and utilization of alternative environmentally friendly gold processing technologies. To this end the project interventions will have positive impact on human health and the ecosystem in general.

Mining activities have their own impact on the environment by their very nature. For instance, they change the natural ecosystem, release pollutants and generate waste.

Regarding the project interventions, the major threats to the environment are air pollution, noise, land subsidence, contamination of surface water and groundwater, and the production of mining and domestic wastes.

To avoid the impact of the project, identification of the positive and negative impacts and the development of environmental management plans are crucial. Environmental monitoring strategies should also be developed. The ASGM sites are situated around transboundary surface water bodies. The mining activities may eventually impact the quantity and quality of regional aquifer systems as well.

Therefore, rehabilitation works on abandoned mining sites should be planned and executed effectively to reduce the negative impacts of the project. Priority needs to be given to management of mercury contaminated tailings. Since the ASGM sector will involve many people the impact on the available natural resources such as land, water for domestic use and mining activities, fuel wood, should be considered in designing the environmental management plan and execution.

The ASGM sector once formalized, there will be a need for infrastructure development and will attract more service sectors in the mining sites. This will also have its own impact on the environment. Legal frameworks and regulations have to be designed and developed to protect the environment from the impacts of the ASGM sector.

CONCLUSIONS, LESSONS LEARNT AND RECOMMENDATIONS

In this section, the MTR team presents the conclusions, lessons learnt and recommendations for the way forward. The conclusions are in light of the findings and highlight the strengths and weaknesses and summarize results of the project. The lessons learnt from the project are important for better project implementation and design of similar projects in the future. The recommendations are based on the findings and conclusions of the implementation progress of the project and provide practical, feasible recommendations directed to the project management and relevant stakeholders on actions to take and decisions to make for better implementation.

Conclusions

The GEF Gold Kenya is one of the projects supported by the planetGold Programme and is designed to reduce or eliminate mercury use in the ASGM sector and avoid the health and environmental risks of the chemical.

The project is relevant to the needs of the country, in terms of addressing the environmental and health burdens associated with Mercury use in ASGM. It feeds into the countries commitments in multilateral Environmental Agreement's such as the Minamata Convention on mercury, as well as the Strategic Approach to International Chemicals management (SAICM). The project also contributes to achievements of SDGS 1 (No Poverty) by increasing income generation among miners; SDG 3 (Health and Well-Being) by reducing the harmful effects of mercury from ASGM activities on local, regional and global populations; SDG 5 (Gender Equality) by mainstreaming gender in the project; SDG 6 (Water and Sanitation) by protecting water resources from Hg contamination; SDG 8 (Decent Work) by improving the working conditions in the mines through safer technologies and practices; SDG 9 (Industry and Infrastructure) by investing in appropriate sustainable technology; SDG 12 (Responsible Consumption and Production) by phasing down gold produced using harmful substances under illegitimate conditions; and SDG 14 (Life below Water) by safeguarding aquatic life from mercury.

The project has been aligned to **UNEDAF/Country Programme Outcome:** *Outcome 4: Policy and Legal Framework:* by 2016 Kenya has robust policies and legal frameworks linking issues of environmental sustainability, climate change, and land management to human security and resilience, therefore, requiring an integrated and coordinated response at all times and **UNDP Strategic Plan Output:** *Output 1.3:* Solutions developed at national and sub-national levels for sustainable management of natural resources, ecosystem services, chemicals, and waste.

From the KIIs, FGDs, and field visits it was evident that the project has taken a multi-stakeholder and multi-disciplinary approach bringing together stakeholders from national, regional to local levels. The project has raised awareness levels on the impacts of mercury on health and the environment to all the stakeholders.

For progress toward results, the project lags behind in Component 2 (access to finance) and Component 3 (access to mercury-free technologies), which form the overall backbone of the project objectives. The delays are both systemic and structural, and threaten the overall sustainability of the project, with the risk that the beneficiaries may not enjoy the full benefits of the project if nothing changes. The challenge of formalization has been identified as a key risk to project success, thus the need for all stakeholders to work towards fast-tracking this component. Formalization will also pave way for the development of financial products. However, this component will depend on the ability of the project team to come up with a risk-sharing model for financial products.

The inefficiencies in the project execution have equally eroded the goodwill from different stakeholders, thus the need for urgent intervention to address the issues of timely facilitation and execution of planned activities.

There is better progress in the implementation of component 1 and 4. To mention the achievements so far four county artisanal miners committees has been established, this AMCs have been supported, a draft stakeholder engagement strategy developed, capacity needs assessment of the government and civil society entities involved in the ASGM extension services was conducted, training manuals and plans were developed, guidelines and regulations regarding the ASGM sector were produced, discussions with financing institutions commenced.

But there is much to be done to implement component 2 and 3 of the project. The project is still at the identification of mercury-free processing technologies, the formalization process has stuck due to lack of concession areas, and an existing moratorium on issuance of new permits by government. The component on market link for gold processed through mercury free technologies has not been developed, and there are no financial instruments and mechanisms developed to support the ASGM sector.

The root causes for the underachievement of project outputs are the implementation modality (NIM). The long bureaucracy at the GoK side and the financial management system (IFMIS) cause unnecessary delays in project execution. A low sense of ownership of the project was observed as a cross-cutting issue in various stakeholders, due to lack of proper engagement of stakeholders. There is inefficient means of verification on M&E by UNDP CO. The composition of PSC (does not involve representatives from key stakeholders such as MoH, Cooperatives), and there are inefficiencies in solving key constraints attributed to low performance stated on the PIRs. PMU has not effectively created synergy among stakeholders, and TAC has not been able to properly offer technical support. The regional coordinators are not based on project sites thus challenges in liaison between national and county level offices. Generally, there is limited support to PMU staff to deliver to the best of their ability (the project finance officer is just compiling reports, the finance is administered by MoECCF finance department and there are unsettled payments). The SDoM have not been properly facilitated to implement their core functions.

In order to make the project effective and bring better performance in project implementation there is need to strengthen the PMU and reconnect TAC members with the PM. For successful implementation in the reminder of the project life the MTR team suggest that the poor ratings forwarded in the PIRs be realized by all parties involved in the project implementation and the recommendation given in this MTR report be used as a base for the achievement of most of the project activities and maximize project benefits.

Lessons Learnt

I. Stakeholder engagement is crucial for successful implementation of the project. Consultation with stakeholders is a key starting from project design throughout implementation to insure ownership of the project and sustainability of the project benefits.
II. Implementation modalities should be assessed properly based on the country's financial management system and government structures.
III. The communication strategy of the project should be used properly and smart communication channels need to be devised and applied to ease the flow of information. The communication expert can be used as an asset to facilitate better communication among stakeholders.

IV. Synergy among the key partners cannot be created only through trainings and awareness creation. Stakeholders should be involved at every stage of the project and their opinions should be considered to bring every actor in line with the project objectives and outcomes.

V. Project ownership from national, regional and local levels is the key for successful implementation of project interventions and sustainability of project benefits.

VI. Engagement of Responsible parties as envisioned in the ProDoc is critical for enhancing efficiency and ownership by stakeholders

VII. Strong Monitoring and Evaluation is important for better performance of the project and feedback mechanisms shall be designed to gear every partner towards the common goal.

VIII. Women are more susceptible to the impact of mercury since they participate on the final stages of the gold processing value chain where it requires direct contact of the chemical. In this regard awareness should be created among the ASGM sector about the danger women are facing and special trainings on mercury handling should be provided.

Recommendations

The project implementation is slow and this is creating uncertainties in the project beneficiaries and the key stakeholders are not efficient in implementation of the project outcomes and outputs. To bring the project back on track and to increase the implementation capacity of all partners the MTR team recommends the following:

I. There is need to shift from NIM to a high-breed of NIM and direct implementation modality, to address the challenges associated with the GoK long bureaucracies to unlock project budget. UNDP can take over execution of critical elements of the project such as procurement of alternative mercury free processing technologies since it is an urgent matter to do more in the remaining time of the project. UNDP is also better placed to engage Responsible parties who are non-government.

II. PSC needs to take a keen role in overseeing project implementations so as to enable timely identification and resolution of project bottlenecks. Additional representatives from SDoM, MoH and SDoC should be included in the PSC.

III. Revise indicators for more clarity. Some indicators have to be revised to ensure consistency. For example, the artisanal miners are indicated in number of beneficiaries and are sometimes treated as groups.

IV. Restructure and strengthen the PMU to improve the engagement of responsible parties to fast-track the implementation of approved activities. PMU should focus more on facilitatory, coordination, and M&E roles.

V. Need to improve cohesion among PMU members. The PM, TAC, and CTA should be on the same page for better performance. Effective communication and feedback mechanisms are the key to better implementation progress and realization of project benefits.

VI. Stakeholder participation should be maximized when conducting assessments, preparation of annual and quarterly plans, and development of policy and legal frameworks regarding the ASGM sector. The documents prepared should be shared and discussed to create a common understanding about the project progress to ensure ownership.

VII. To address the challenge of formalization, the SDoM should refocus on issuance of dealer processing permits for the most organized groups, as a low hanging fruit to unlock the challenge associated with informality.

VIII. Project should liaise closely with the financial institutions to iron out risk sharing models that can unlock component 2.

IX. Project should also fast-track the component of grants to the communities so as to trigger the demand for financial products, and consequently the applications for loans as envisioned under component 2.

X. The component of training of trainers for Mercury free technologies need to be fast-tracked, in preparation for roll out of technologies. This will contribute to ultimate sustainability of the project.

XI. Strengthen the monitoring and reporting component, especially reporting on work plan, so as to address causes for delays prior to preparation of next work plan.

XII. In the absence of regional officers, to address the gaps left, the regional mining officers in Kakamega and Vihiga should forward an officer each to be directly responsible for liaison and coordination of field activities.

XIII. TAC should play a stronger role in oversight, and put the PMU to task on any un implemented resolutions. Where need be, the issue can be escalated to the PSC.

XIV. An exit strategy and sustainability plan should be developed by identifying the responsible government offices, mining groups and associations for the smooth transfer of the alternative technologies to be planted and a financial strategy shall be designed for operation and maintenance. This is a key for ensuring the sustainability of project benefits once project phase-out and will enhance ownership of the project and accountability.

XV. Based on the current progress of project implementation it is unlikely to achieve much in the remaining project life. Therefore, the MTR team strongly advise to request and get approval for a no cost time extension to implement especially components 2 & 3 of the project. The sustainability of the project lies on the formalization of the ASGM sector, financial instruments and mechanism to be designed, and alternative mercury-free processing technologies in place. At least an additional one year is required to materialize these.

ANNEXES

Annex 1: MTR Terms of Reference

Mid-Term Review Terms of Reference

Formatted for attachment to UNDP Procurement Website

BASIC CONTRACT INFORMATION
Location: Kenya
Application Deadline: 4:00 PM GMT +3 on 21st October 2022
Type of Contract: Individual
Contract Post Level: International Consultant (Specialist)
Languages Required: English
Starting Date: 27th October 2022
Duration of Contract: 30 working days (within 3 months)
Expected Duration of Assignment: October 2022 – January 2023

1. INTRODUCTION

This is the Terms of Reference (ToR) for -the Midterm Review (MTR) of the full-sized UNDP-supported GEF-financed project titled **Integrated Sound Management of Mercury in Kenya's ASGM (IMKA) (PIMS5877)** implemented through the Ministry of Environment and Forestry, which is to be undertaken in 2022. The project started on the 05 July 2019 and is in its *third* year of implementation. This ToR sets out the expectations for this MTR. The MTR process is following the guidance outlined in the document *Guidance for Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects* http://web.undp.org/evaluation/documents/guidance/GEF/mid-term/Guidance_Midterm%20Review%20_EN_2014.pdf

A team of two independent consultants will conduct the MTR - one team leader/International Consultant (with experience and exposure to projects and evaluations in other regions globally) and one team expert/National Consultant, from Kenya.

This ToR is for the International Consultant and Team Leader for the task.

2. PROJECT BACKGROUND INFORMATION

In Kenya, total mercury releases to the environment are estimated at 31 tonnes per year, of which 6.8% (~.2.1 tonnes Hg/year) originates from the country's Artisanal and Small-scale Gold Mining (ASGM) sector (MENR, 2012). Mercury concentrations in sediments collected from rivers in Migori ranged between 30 and 2,380 µg/kg[17]. Rivers in this region ultimately drain into the Lake Victoria and Lake Turkana, which provide dietary fish for domestic consumption and export.

Kenya lacks a dedicated law on mercury, which makes it difficult to control the handling and movement of the chemical. Nevertheless, it is a signatory to the Minamata Convention on Mercury since 10th

[17] Odumo et al. 2014: Impact of gold mining associated with mercury contamination in soil, biota sediments and tailings in Kenya

October 2013 and is working towards its ratification. The Ministry of Environment and Forestry lacks information on mercury production, supply, import, export and usage, and although many miners are aware that mercury has negative effects on health, none have heard of anyone being diagnosed with mercury poisoning.

Kenya's entire mining sector contributes 14.2% to the GDP and employs about 200,000 people[18]. The ASM sector was expected to contribute 3% in the year 2017 and 10% of the GDP by the year 2030[19]. Kenya's ASGM sector is largely informal, unregulated and until its recent recognition by the Mining Act No. 12 of 2016, illegal.

Among the barriers to development of the ASGM sector cited by miners, technology constraints and access to finance are the most critical. Financial access is reportedly a major deterrent to access to formal credit markets by small businesses. Weak and poorly administered miners' cooperatives and organizations are often not up to the task of pooling capital and sharing the cost and effort of pursuing licenses and permits that could provide them with the legitimacy and bankability to access credit for transformative and mercury-free technologies. Financial entities (banks, microfinance institutions, and other lenders) are reticent to risk thus avoid providing loans to ASGM. This is compounded by the paucity of ASGM production records that would enable lenders to evaluate ASGM loan applications and to develop financial products that are tailored to the ASGM sector. Improving financial access is critical if miners' capacity is to be enhanced to adopt safer and alternative mining technologies that will in improving efficiency and production.

The objective of the project is to reduce/eliminate mercury releases from the Kenyan ASGM sector. The project will support 6 ASGM communities in Kenya to reduce mercury use by 0.5 metric tonnes per year (mercury reductions will likely start in year three (3) of the project), resulting in a total of 1.5 tonnes of mercury avoided over the duration of the 5-year project. Strategies to be employed to address the development challenge and achieve the Objectives will be:

Component 1. Strengthening institutions and the policy/regulatory framework for mercury-free ASGM
Component 2. Increasing the access of mining communities to finance to enable the procurement of mercury-free processing technologies
Component 3. Increasing the capacity of mining communities for mercury-free ASGM through the provision of technical assistance, technology transfer and support for formalization
Component 4. Raising awareness and disseminating best practices and lessons-learned on mercury phase-out in the ASGM sector.

The project is designed to achieve the Long-Term Impact, or Global Environmental Benefits (mercury free artisanal and small-scale gold production) through mining policy and legislation development and the formalisation of ASGM operations in Kenya.

3. MTR PURPOSE

The MTR will assess progress towards the achievement of the project objectives and outcomes as specified in the Project Document and assess early signs of project success or failure with the goal of

[18] Kenya, Republic of. 2016. Kenya Mining and Minerals Policy. Ministry of Mining
[19] Kenya, Republic of. 2016. Kenya Mining and Minerals Policy. Ministry of Mining

identifying the necessary changes to be made in order to set the project on-track to achieve its intended results. The MTR will also review the project's strategy and its risks to sustainability.

MTRs are primarily a monitoring tool to identify challenges and outline corrective actions to ensure that a project is on track to achieve maximum results by its completion. The primary output/deliverable of an MTR process is the MTR report. The MTR report will be submitted to GEF as a mandatory requirement for all GEF-financed full-sized projects (FSP).

The MTR report must be completed and submitted to GEF secretariate with the 2nd Project Implementation Report (PIR) in 2021.

4. MTR APPROACH & METHODOLOGY

The MTR must provide evidence-based information that is credible, reliable and useful.

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

The MTR team is expected to follow a collaborative and participatory approach[20] ensuring close engagement with the Project Team, government counterparts (the GEF Operational Focal Point), the UNDP Country Office(s), the Nature, Climate and Energy (NCE) Regional Technical Advisers, direct beneficiaries, and other key stakeholders.

Engagement of stakeholders is vital to a successful MTR.[21] Stakeholder involvement should include interviews with stakeholders who have project responsibilities, including but not limited to (Ministry of Environment and Forestry, Ministry of Petroleum and Mining, Ministry of Health, Ministry of Water and Sanitation, Kakamega County Government, Vihiga County Government, Migori County Government, Narok County Government, National Environment Management Authority, Centre for Environment Justice and Development, Impact Facility); senior officials and task team/ component leaders, key experts and consultants in the subject area, Project Board, project stakeholders, academia, local government and CSOs, etc. Additionally, the MTR team is expected to conduct field mission(s) to western Kenya Gold Belt, including the following project sites in Kakamega, Vihiga, Migori and Narok.

Following the World Health Organization (WHO) declaration of COVID-19 a global pandemic and the national controls on the spread of the disease, the MTR will potentially be carried out both virtually and field visits as possible. Travel to Kenya is possible but with strict adherence to Covid-19 Travel Guide for Kenya, that is reviewed based on the prevailing infection threats.

[20] For ideas on innovative and participatory Monitoring and Evaluation strategies and techniques, see UNDP Discussion Paper: Innovations in Monitoring & Evaluating Results, 05 Nov 2013.
[21] For more stakeholder engagement in the M&E process, see the UNDP Handbook on Planning, Monitoring and Evaluating for Development Results, Chapter 3, pg. 93.

If it is not possible to travel to or within the country for the MTR, then the MTR team should develop a methodology and approach that takes this into account. This may require the use of remote interview methods through telephone or online (skype, zoom etc.), extended desk reviews, data analysis, surveys, and evaluation questionnaires. These approaches and methodologies should be detailed in the Inception Report and agreed with UNDP. If all or part of the MTR is to be carried out virtually then consideration should be taken for stakeholder availability, ability, and willingness to be interviewed remotely and the constraints this may place on MTR. These limitations must be reflected in the final MTR report.

The specific design and methodology for the MTR should emerge from consultations between the MTR team and the above-mentioned parties regarding what is appropriate and feasible for meeting the MTR purpose and objectives and answering the evaluation questions, given limitations of budget, time and data. The MTR team must, however, use gender-responsive methodologies and tools and ensure that gender equality and women's empowerment, as well as other cross-cutting issues and SDGs are incorporated into the MTR report.

The final methodological approach including interview schedule, field visits and data to be used in the MTR should be clearly outlined in the Inception Report and be fully discussed and agreed between UNDP, stakeholders and the MTR team.

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

5. DETAILED SCOPE OF THE MTR

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

i. Project Strategy

Project design:

- Review the problem addressed by the project and the underlying assumptions. Review the effect of any incorrect assumptions or changes to the context to achieving the project results as outlined in the Project Document.
- Review the relevance of the project strategy and assess whether it provides the most effective route towards expected/intended results. Were lessons from other relevant projects properly incorporated into the project design?
- Review how the project addresses country priorities. Review country ownership. Was the project concept in line with the national sector development priorities and plans of the country (or of participating countries in the case of multi-country projects)?
- Review decision-making processes: were perspectives of those who would be affected by project decisions, those who could affect the outcomes, and those who could contribute information or other resources to the process, taken into account during project design processes?
- Review the extent to which relevant gender issues were raised in the project design. See Annex 9 of *Guidance for Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects* for further guidelines.

- Were relevant gender issues (e.g., the impact of the project on gender equality in the programme country, involvement of women's groups, engaging women in project activities) raised in the Project Document?

- If there are major areas of concern, recommend areas for improvement.

Results Framework/Log frame:

- Undertake a critical analysis of the project's log frame indicators and targets, assess how "SMART" the midterm and end-of-project targets are (Specific, Measurable, Attainable, Relevant, Time-bound), and suggest specific amendments/revisions to the targets and indicators as necessary.
- Are the project's objectives and outcomes or components clear, practical, and feasible within its time frame?
- Examine if progress so far has led to, or could in the future catalyse beneficial development effects (i.e., income generation, gender equality and women's empowerment, improved governance etc...) that should be included in the project results framework and monitored on an annual basis.
- Ensure broader development and gender aspects of the project are being monitored effectively. Develop and recommend SMART 'development' indicators, including sex-disaggregated indicators and indicators that capture development benefits.

ii. Progress Towards Results

Progress Towards Outcomes Analysis:

- Review the log frame indicators against progress made towards the end-of-project targets using the Progress Towards Results Matrix and following the *Guidance for Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects*; colour code progress in a "traffic light system" based on the level of progress achieved; assign a rating on progress for each outcome; make recommendations from the areas marked as "Not on target to be achieved" (red).

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

Project Strategy	Indicator[22]	Baseline Level[23]	Level in 1st PIR (self-reported)	Midterm Target[24]	End-of-project Target	Midterm Level & Assessment[25]	Achievement Rating[26]	Justification for Rating
Objective:	Indicator (if applicable):							
Outcome 1:	Indicator 1:							
	Indicator 2:							
Outcome 2:	Indicator 3:							
	Indicator 4:							
	Etc.							

[22] Populate with data from the Log frame and scorecards
[23] Populate with data from the Project Document
[24] If available
[25] Color code this column only
[26] Use the 6 point Progress Towards Results Rating Scale: HS, S, MS, MU, U, HU

Etc.								

Indicator Assessment Key

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

In addition to the progress towards outcomes analysis:

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

iii. Project Implementation and Adaptive Management

Management Arrangements:

- Review overall effectiveness of project management as outlined in the Project Document. Have changes been made and are they effective? Are responsibilities and reporting lines clear? Is decision-making transparent and undertaken in a timely manner? Recommend areas for improvement.
- Review the quality of execution of the Executing Agency/Implementing Partner(s) and recommend areas for improvement.
- Review the quality of support provided by the GEF Partner Agency (UNDP) and recommend areas for improvement.
- Do the Executing Agency/Implementing Partner and/or UNDP and other partners have the capacity to deliver benefits to or involve women? If yes, how?
- What is the gender balance of project staff? What steps have been taken to ensure gender balance in project staff?
- What is the gender balance of the Project Board? What steps have been taken to ensure gender balance in the Project Board?

Work Planning:

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

Finance and co-finance:

- Consider the financial management of the project, with specific reference to the cost-effectiveness of interventions.
- Review the changes to fund allocations as a result of budget revisions and assess the appropriateness and relevance of such revisions.

- Does the project have the appropriate financial controls, including reporting and planning, that allow management to make informed decisions regarding the budget and allow for timely flow of funds?
- Informed by the co-financing monitoring table to be filled out by the Commissioning Unit and project team, provide commentary on co-financing: is co-financing being used strategically to help the objectives of the project? Is the Project Team meeting with all co-financing partners regularly in order to align financing priorities and annual work plans?

Sources of Co-financing	**Name of Co-financer**	**Type of Co-financing**	**Co-financing amount confirmed at CEO Endorsement (US$)**	**Actual Amount Contributed at stage of Midterm Review (US$)**	**Actual % of Expected Amount**
		TOTAL			

- Include the separate GEF Co-Financing template (filled out by the Commissioning Unit and project team) which categorizes each co-financing amount as 'investment mobilized' or 'recurrent expenditures. (This template will be annexed as a separate file.)

Project-level Monitoring and Evaluation Systems:

- Review the monitoring tools currently being used: Do they provide the necessary information? Do they involve key partners? Are they aligned or mainstreamed with national systems? Do they use existing information? Are they efficient? Are they cost-effective? Are additional tools required? How could they be made more participatory and inclusive?
- Examine the financial management of the project monitoring and evaluation budget. Are sufficient resources being allocated to monitoring and evaluation? Are these resources being allocated effectively?
- Review the extent to which relevant gender issues were incorporated in monitoring systems. See Annex 9 of *Guidance for Conducting Midterm Reviews of UNDP-Supported, GEF-Financed Projects* for further guidelines.

Stakeholder Engagement:

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

- How does the project engage women and girls? Is the project likely to have the same positive and/or negative effects on women and men, girls and boys? Identify, if possible, legal, cultural, or religious constraints on women's participation in the project. What can the project do to enhance its gender benefits?

Social and Environmental Standards (Safeguards)

- Validate the risks identified in the project's most current SESP, and those risks' ratings; are any revisions needed?
- Summarize and assess the revisions made since CEO Endorsement/Approval (if any) to:
  - The project's overall safeguards risk categorization.
  - The identified types of risks[27] (in the SESP).
  - The individual risk ratings (in the SESP).
- Describe and assess progress made in the implementation of the project's social and environmental management measures as outlined in the SESP submitted at CEO Endorsement/Approval (and prepared during implementation, if any), including any revisions to those measures. Such management measures might include Environmental and Social Management Plans (ESMPs) or other management plans, though can also include aspects of a project's design; refer to Question 6 in the SESP template for a summary of the identified management measures.

A given project should be assessed against the version of UNDP's safeguards policy that was in effect at the time of the project's approval.

Reporting:

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

Communications & Knowledge Management:

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

[27] Risks are to be labeled with both the UNDP SES Principles and Standards, and the GEF's "types of risks and potential impacts": Climate Change and Disaster; Disadvantaged or Vulnerable Individuals or Groups; Disability Inclusion; Adverse Gender-Related impact, including Gender-based Violence and Sexual Exploitation; Biodiversity Conservation and the Sustainable Management of Living Natural Resources; Restrictions on Land Use and Involuntary Resettlement; Indigenous Peoples; Cultural Heritage; Resource Efficiency and Pollution Prevention; Labor and Working Conditions; Community Health, Safety and Security.

- List knowledge activities/products developed (based on knowledge management approach approved at CEO Endorsement/Approval).

iv. Sustainability

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

Financial risks to sustainability:

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

Socio-economic risks to sustainability:

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

Institutional Framework and Governance risks to sustainability:

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

Environmental risks to sustainability:

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

Conclusions & Recommendations

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

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

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

Ratings

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

Table. MTR Ratings & Achievement Summary Table for Integrated Sound Management of Mercury in Kenya's ASGM (IMKA) PIMS 5877

Measure	MTR Rating	Achievement Description

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

6. TIMEFRAME

The total duration of the MTR will be approximately 30 working days over a time period of 10 weeks and shall not exceed five months from when the consultant(s) are hired. The tentative MTR timeframe is as follows:

ACTIVITY	NUMBER OF WORKING DAYS	COMPLETION DATE
Document review and preparing MTR Inception Report (MTR Inception Report due no later than 2 weeks before the MTR mission)	*4 days*	*25th October 2022*
MTR **virtual** stakeholder meetings, interviews NB: Field visits if Covid-19 Travel Guide for Kenya allowing for International Consultant	*12 days*	*15th November 2022*
Presentation of initial findings- last day of the MTR mission	*1 day*	*16th November 2022*
Preparing draft report (due within 3 weeks of the MTR mission)	*10 days*	*28th November 2022*
Finalization of MTR report/ Incorporating audit trail from feedback on draft report (due within 1 week of receiving UNDP comments on the draft)	*3 days*	*15th December 2022*

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

7. MIDTERM REVIEW DELIVERABLES

#	Deliverable	Description	Timing	Responsibilities

1	**MTR Inception Report**	MTR team clarifies objectives and methods of Midterm Review	No later than 2 weeks before the MTR mission	MTR team submits to the Commissioning Unit and project management
2	**Presentation**	Initial Findings	End of MTR mission	MTR Team presents to project management and the Commissioning Unit
3	**Draft Final Report**	Full report (using guidelines on content outlined in Annex B) with annexes	Within 3 weeks of the MTR mission	Sent to the Commissioning Unit, reviewed by RTA, Project Coordinating Unit, GEF OFP
4	**Final Report***	Revised report with audit trail detailing how all received comments have (and have not) been addressed in the final MTR report	Within 1 week of receiving UNDP comments on draft	Sent to the Commissioning Unit

*The final MTR report must be in English. If applicable, the Commissioning Unit may choose to arrange for a translation of the report into a language more widely shared by national stakeholders.

8. MTR ARRANGEMENTS

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

UNDP Kenya will contract the consultants and ensure the timely provision of per diems and travel arrangements within the country for the MTR team and will provide an updated stakeholder list with contact details (phone and email). The Project Team will be responsible for liaising with the MTR team to provide all relevant documents, set up stakeholder interviews, and arrange field visits.

If the travel is allowed, international travel will be required to Nairobi in Kenya, and a 12-days field mission to western Kenya counties of Kakamega and Migori.

9. TEAM COMPOSITION

A team of two independent consultants will conduct the MTR - one team leader/International Consultant (with experience and exposure to projects and evaluations in other regions globally) and one team expert/National Consultant, from Kenya. The International Consultant will work with a National Consultant and/or if the International Consultant is to operate remotely, the experience in implementing evaluations remotely will be a consideration. The consultants cannot have participated in the project preparation, formulation, and/or implementation (including the writing of the Project Document) and should not have a conflict of interest with project's related activities.

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

<u>Education</u>

- A Master's degree or above in Environmental Science, Environmental Engineering, Chemical Engineering, Mining Engineering, Natural Science, Natural Resource Management, Business Administration, social science or other closely related field **(15 marks)**

<u>Experience</u>

- Relevant experience with result-based management evaluation methodologies; **(10 marks)**

- Experience applying SMART indicators and reconstructing or validating baseline scenarios; **(5 marks)**
- Competence in adaptive management, especially on Artisanal Small-scale Gold Mining (ASGM) and hazardous chemicals such as mercury; **(5 marks)**
- Experience in evaluating projects; **(10 marks)**
- Experience working in Africa especially east Africa countries; **(5 marks)**
- Minimum 10 years' experience working in relevant technical areas; **(10 marks)**
- Demonstrated understanding of issues related to gender and ASGM/hazardous chemicals; experience in gender sensitive evaluation and analysis. **(10 marks)**
- Excellent communication skills; **(5 marks)**
- Demonstrable analytical skills; **(10 marks)**
- Project evaluation/review experiences within United Nations system will be considered an asset; **(5 marks)**
- Experience with implementing evaluations remotely will be considered an asset. **(5 marks)**

Language

- Fluency in written and spoken English. **(5 marks)**

10. ETHICS

This MTR will be conducted in accordance with the principles outlined in the UNEG 'Ethical Guidelines for Evaluation'. The MTR team must safeguard the rights and confidentiality of information providers, interviewees and stakeholders through measures to ensure compliance with legal and other relevant codes governing collection of data and reporting on data. The MTR team must also ensure security of collected information before and after the MTR and protocols to ensure anonymity and confidentiality of sources of information where that is expected. The information, knowledge and data gathered in the MTR process must also be solely used for the MTR and not for other uses without the express authorization of UNDP and partners.

11. PAYMENT MODALITIES AND SPECIFICATIONS

- 20% payment upon satisfactory delivery of the final MTR Inception Report and approval by the Commissioning Unit
- 40% payment upon satisfactory delivery of the draft MTR report to the Commissioning Unit
- 40% payment upon satisfactory delivery of the final MTR report and approval by the Commissioning Unit and RTA (via signatures on the TE Report Clearance Form) and completed TE Audit Trail

Criteria for issuing the final payment of 40%

- The final MTR report includes all requirements outlined in the MTR TOR and is in accordance with the MTR guidance.
- The final MTR report is clearly written, logically organized, and is specific for this project (i.e., text has not been cut & pasted from other MTR reports).
- The Audit Trail includes responses to and justification for each comment listed.

In line with the UNDP's financial regulations, when determined by the Commissioning Unit and/or the consultant that a deliverable or service cannot be satisfactorily completed due to the impact of COVID-

19 and limitations to the MTR, that deliverable or service will not be paid. Due to the current COVID-19 situation and its implications, a partial payment may be considered if the consultant invested time towards the deliverable but was unable to complete to circumstances beyond his/her control.

12. APPLICATION PROCESS[28]

Recommended Presentation of Proposal:

a) **Letter of Confirmation of Interest and Availability** using the template[29] provided by UNDP;
b) **CV** or **Personal History Form** (P11 form[30]);
c) **Brief description of approach to work/technical proposal** of why the individual considers him/herself as the most suitable for the assignment, and a proposed methodology on how they will approach and complete the assignment; (max 1 page)
d) **Financial Proposal** that indicates the all-inclusive fixed total contract price and all other travel related costs (such as flight ticket, per diem, etc.), supported by a breakdown of costs, as per template attached to the Letter of Confirmation of Interest template. If an applicant is employed by an organization/company/institution, and he/she expects his/her employer to charge a management fee in the process of releasing him/her to UNDP under Reimbursable Loan Agreement (RLA), the applicant must indicate at this point, and ensure that all such costs are duly incorporated in the financial proposal submitted to UNDP.

All application materials should be sent to consultants.ken@undp.org to reach us not later than 4:00 PM GMT +3 on 21st October 2022.

Criteria for Evaluation of Proposal: Only those applications which are responsive and compliant will be evaluated (Only candidates obtaining a minimum of 70 points). Offers will be evaluated according to the Combined Scoring method – where the educational background and experience on similar assignments will be weighted at 70% and the price proposal will weigh as 30% of the total scoring. The applicant receiving the Highest Combined Score that has also accepted UNDP's General Terms and Conditions will be awarded the contract.

[28] Engagement of the consultants should be done in line with guidelines for hiring consultants in the POPP: https://info.undp.org/global/popp/Pages/default.aspx

[29] https://intranet.undp.org/unit/bom/pso/Support%20documents%20on%20IC%20Guidelines/Template%20for%20Confirmation%20of%20Interest%20and%20Submission%20of%20Financial%20Proposal.docx

[30] http://www.undp.org/content/dam/undp/library/corporate/Careers/P11_Personal_history_form.doc

Annex 2: MTR Evaluation Matrix

Evaluative Questions	Indicators	Sources	Methodology
Project Strategy: To what extent is the project strategy relevant to country priorities, country ownership, and the best route towards expected results?			
Project Design:			
Is the project aligned to national and local priorities?	Alignment with policies, strategies to address the identified problems	ProDoc, National policies and strategies	Comparative Analysis
	Alignment with GEF focal area outcomes and outputs	ProDoc, GEF documents	Comparative Analysis
	Feasibility of the ToC, risks and assumptions	ProDoc, GEF documents, KIIs	Comparative Analysis
To what extent is the project strategy relevant to address the problems raised?	Provides the most effective route towards expected/intended results	ProDOC, Inception Report, KIIs	Comparative Analysis
Were lessons learned from other relevant projects properly incorporated into the project design?	Evidence of lessons from other projects considered in the project design	ProDOC, Inception Report, Interviews	Comparative Analysis
Were perspectives of those who would be affected by project decisions, those who could affect the outcomes, and those who could contribute information or other resources to the process, taken into account during project design processes?	Evidence of stakeholder engagement and assessments	ProDoc, Inception Report, Interviews	Comparative Analysis
Were relevant gender issues (e.g., the impact of the project on gender equality in the programme country, involvement of women's groups, engaging women in project activities) raised in the Project Document?	Relevant gender issues raised in the project	ProDoc, Inception Report, Interviews	Comparative Analysis
Are there major areas of concern?	Areas for improvement	ProDoc, Inception Report, Interviews	Review
Results Framework/Log Frame:			
How "SMART" are the midterm and end-of-project targets are (Specific, Measurable, Attainable, Relevant, Time-bound)?	The project's log frame indicators and targets	ProDoc, Inception Report, AWPs	Review of targets
Are the project's objectives and outcomes or components clear, practical, and feasible within its timeframe?	Coherence between project objectives and outcomes or components	ProDoc, Inception Report, PIRs, KIIs	Comparative Analysis
Does the progress so far have led to, or could in the future catalyse beneficial development effects (i.e., income generation, gender equality and women's empowerment, improved governance etc...)	Issues that should be included in the project results framework and monitored on an annual basis	ProDoc, Inception Report, PIRs, AWPs, KIIs	Review and Assessment
Does the loge frame ensure broader development and gender aspects of the project are being monitored effectively?	Development indicators	ProDoc, Inception Report, PIRs, AWPs, KIIs	Review and Assessment
Progress Towards Results: To what extent have the expected outcomes and objectives of the project have been achieved thus far?			
Progress Towards Outcomes Analysis:			
To what extent are the log frame indicators met? Are the targets for the GEF Tracking Tool met? If not, what are the factors hindering to meet targets?	Evidence of achievements in meeting the targets so far	PIRs, Tracking tool, KIIs	Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 1.1: Capacity of 4 government entities increased to improve their capacity to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector.	FGDs, KIIs, PIRs, Tracking Tool, CD Assessment documents	Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 1.2: Enabling environment created through improved national policies and	KIIs, PIRs, Tracking Tool, Policies, Regulatory Frameworks	Policy Analysis, Progress towards results analysis, triangulation, contribution analysis

	regulatory frameworks for ASGM and mercury phase-out in the ASGM sector.		
	Outcome Indicator 2.1: Loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners and cooperatives/associations.	Financial Reports, FGDs, KIIs, PIRs, Tracking Tool	Financial Analysis, Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 2.2: 18 ASGM cooperatives/associations (of which 4 are women led and 14 are men led) are capacitated to apply for loans for mercury-free processing equipment/investments.	FGDs, KIIs, PIRs, Tracking Tool, CD Assessment documents	Capacity Development Analysis, Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 3.1: 1.5 tonnes of mercury avoided through the introduction of BEP, BAT and socially and environmentally sound ASGM practices End-of-Project Target: Total mercury use/releases from ASGM avoided by 1.5 tonnes. End-of-Project Target: 480 kg of gold produced without mercury	Field Observation, FGDs, KIIs, PIRs, Tracking Tool	Analysis of production Methods, Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 3.2: 1,600 ASGM miners (of which 1/3 women miners) supported in their formalization processes leading to more sustainable income opportunities and safer working conditions. End-of-Project Target: At least 1,600 miners (of which 1/3 women miners) supported in their formalization processes.	Regulatory Frameworks, FGDs, KIIs, PIRs, Tracking Tools	Analysis of Regulatory Frameworks, Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 3.3: Route to market for mercury-free gold improved/established. End-of-Project Target: 240 kg of mercury-free gold sold to the formal market.	Market Assessment Documents, FGDs, KIIs, PIRs, Tracking Tools	Market Link Analysis**,** Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 4.1: Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM. End-of-Project Target: Awareness raised of 54,600 people (16,380 female and 38,220 male) on the dangers of mercury and ways to reduce its use in ASGM.	Assessment Documents, Survey Results, Training Manuals, FGDs, KIIs, PIRs	Analysis of Trainings and Awareness Campaigns Conducted, Review of Survey results, Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 4.2: M&E and adaptive management applied in response to needs and Mid-Term Evaluation findings. End-of-Project Target: 38 of GEF M&E requirements met and adaptive management applied in response to needs and Mid-term Evaluation (MTE) findings.	ProDoc, M&E Plan and Reports, PIRs, KIIs, Tracking Tools	Review of M&E plans and reports, Progress towards results analysis, triangulation, contribution analysis
	Outcome Indicator 4.3: Project results, experiences, lessons-learned and best practices are	Lessons Learned and Best Practice Documents, PIRs, Country Project	Analysis of Lessons Learned and Best Practice, Progress towards

	captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and global dissemination, using report templates provided by the GEF GOLD global component where appropriate. End-of-Project Target: 1 GEF GOLD country project webpage maintained. End-of-Project Target: Country project participated in 1 Global ASGM Forum, 1 Annual Programme Conference, and 12 monthly programme/project calls on a yearly basis. End-of-Project Target: Opportunities for communication of project activity results at a global level are identified on a quarterly basis in collaboration with the GEF GOLD global component. End-of-Project Target: On a quarterly basis, information on project progress (using agreed metrics and templates provided by the GEF GOLD global component where appropriate) is submitted to the GEF GOLD global component.	Webpage, FGDs, KIIs, Communication Strategy, Annual and Quarter Project reports	results analysis, triangulation, contribution analysis
What are the barriers to achieving the project objective in the remainder of the project?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents	Triangulation
Based on the aspects of the project that have already been successful, what are the factors for expanding the benefits?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents	Triangulation
Project Implementation and Adaptive Management: Has the project been implemented efficiently, cost-effectively, and been able to adapt to any changing conditions thus far? To what extent are project-level monitoring and evaluation systems, reporting, and project communications supporting the project's implementation? To what extent has progress been made in the implementation of social and environmental management measures? Have there been changes to the overall project risk rating and/or the identified types of risks as outlined at the CEO Endorsement stage?			
Management Arrangements:			
Is the overall project management effective as outlined in the Project Document? Have changes been made and are they effective? Are responsibilities and reporting lines clear? Is decision-making transparent and undertaken in a timely manner?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents	Triangulation, Review
Was the quality of execution of the Executing Agency/Implementing Partner(s) adequate?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs, Documents	Triangulation
Has the quality of support provided by the GEF Partner Agency (UNDP) been adequate?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs, Documents	Triangulation
Do the Executing Agency/Implementing Partner and/or UNDP and other partners have the capacity to deliver benefits to or involve women? If yes, how?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs, Documents	Triangulation, Review
What is the gender balance of project staff? What steps have been taken to ensure gender balance in project staff?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents	Triangulation, Comparative Analysis
What is the gender balance of the Project Board? What steps have been taken to ensure gender balance in the Project Board?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents	Triangulation, Comparative Analysis

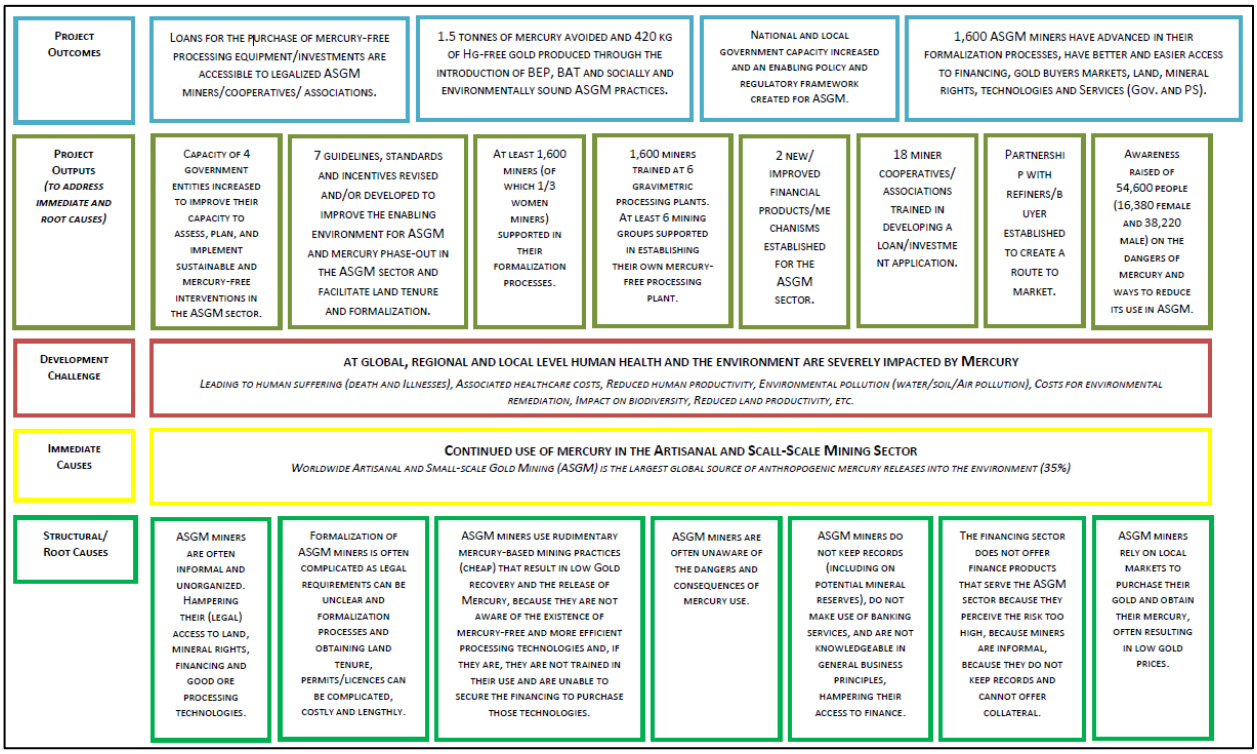
Work Plan:			
Have there been delays in project start-up and implementation? What were the main causes for the delays? Have the issues been resolved?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents (AWPs, PIRs and Board Meeting Minutes)	Triangulation, Comparative Analysis
Are work-planning processes results-based?	Agreement of interview feedbacks and evidence from document review	KIIs, Documents (AWPs, PIRs)	Triangulation, Comparative Analysis
Was the project's results framework/ log frame used as a management tool? Have changes been made to it since project start up?	Evidence from document review	Inception Report, ProDoc, AWPs, PIRs, KIIs,	Triangulation, Comparative Analysis
Finance and Co-finance:			
Was the financial management of the project smart? Were project interventions cost-effective?	Agreement of interview feedbacks and evidence from document review	AWPs, PIRs, CDRs, Financial Reports, Board Meetings	Triangulation, Comparative Analysis
Were changes made to fund allocations as a result of budget revisions? Were the changes appropriate and relevant to project implementation?	Agreement of interview feedbacks and evidence from document review	AWPs, PIRs, CDRs, Financial Reports, Board Meetings	Triangulation, Comparative Analysis
Does the project have the appropriate financial controls, including reporting and planning, that allow management to make informed decisions regarding the budget and allow for timely flow of funds?	Agreement of interview feedbacks and evidence from document review	AWPs, PIRs, CDRs, Financial Reports, Board Meetings	Triangulation, Comparative Analysis
Is co-financing being used strategically to help the objectives of the project? Is the Project Team meeting with all co-financing partners regularly in order to align financing priorities and annual work plans?	Agreement of interview feedbacks and evidence from document review	AWPs, PIRs, CDRs, Financial Reports, Board Meetings	Triangulation, Comparative Analysis
Project-level Monitoring and Evaluation System:			
Are the monitoring tools currently being used appropriate to the project context? Do they provide the necessary information? Do they involve key partners? Are they aligned or mainstreamed with national systems? Do they use existing information? Are they efficient? Are they cost-effective? Are additional tools required? How could they be made more participatory and inclusive?	Agreement of interview feedbacks and evidence from document review	ProDoc, M&E Plan, PIRs, AWPs, KIIs, FGDs	Triangulation, Comparative Analysis
Is the financial management of the project monitoring and evaluation budget smart? Are sufficient resources being allocated to monitoring and evaluation? Are these resources being allocated effectively?	Agreement of interview feedbacks and evidence from document review	M&E Plan, PIRs, AWPs, KIIs, FGDs	Triangulation, Comparative Analysis
To what extent do relevant gender issues were incorporated in monitoring systems?	Agreement of interview feedbacks and evidence from document review	M&E Plan, PIRs, AWPs, KIIs, FGDs	Triangulation, Comparative Analysis
Stakeholder Engagement:			
Has the project developed and leveraged the necessary and appropriate partnerships with direct and tangential stakeholders?	Agreement of interview feedbacks and evidence from document review	ProDoc, Stakeholder Map, PIRs, AWPs, KIIs	Triangulation, Comparative Analysis
Do local and national government stakeholders support the objectives of the project? Do they continue to have an active role in project decision-making that supports efficient and effective project implementation?	Agreement of interview feedbacks and evidence from document review	Stakeholder Map, PIRs, AWPs, KIIs, Board Meeting Minutes	Triangulation, Comparative Analysis

To what extent has stakeholder involvement and public awareness contributed to the progress towards achievement of project objectives?	Agreement of interview feedbacks and evidence from document review	PIRs, AWPs, KIIs, Board Meeting Minutes	Triangulation, Comparative Analysis
How does the project engage women and girls? Is the project likely to have the same positive and/or negative effects on women and men, girls and boys? What are the legal, cultural, or religious constraints on women's participation in the project. What can the project do to enhance its gender benefits?	Agreement of interview feedbacks and evidence from document review	PIRs, AWPs, KIIs, FGDs, Gender Mainstreaming Strategy	Triangulation, Comparative Analysis
Social and Environmental Standards:			
Do the risks identified in the project's most current SESP, and those risks' ratings are sufficient or do they need revision?	Agreement of interview feedbacks and evidence from document review	ProDoc, SESP, PIRs, AWPs, KII	Review, Comparative Analysis
Were revisions made since CEO Endorsement/Approval on the project's overall safeguards risk categorization, the identified types of risks (in the SESP), and the individual risk ratings (in the SESP)?	Agreement of interview feedbacks and evidence from document review	SESP, Review Document (if available), PIRs, KII	Review
To what extent is the progress made in the implementation of the project's social and environmental management measures as outlined in the SESP submitted at CEO Endorsement/Approval (and prepared during implementation, if any), including any revisions to those measures?	Agreement of interview feedbacks and evidence from document review	PIRs, AWPs, KIIs	Triangulation, Comparative Analysis
Was alignment made against the version of UNDP's safeguards policy that was in effect at the time of the project's approval?	Agreement of interview feedbacks and evidence from document review	ProDoc, SESP, PIRs, AWPs, KII	Triangulation, Comparative Analysis
Reporting:			
To what extent does adaptive management changes have been reported by the project management and shared with the Project Board?	Agreement of interview feedbacks and evidence from document review	PIRs, AWPs, Board Meeting Minutes, KIIs	Triangulation, Comparative Analysis
How well do the Project Team and partners undertake and fulfil GEF reporting requirements (i.e., how have they addressed poorly-rated PIRs?	Agreement of interview feedbacks and evidence from document review	PIRs, Board Meeting Minutes and other documents, KIIs	Triangulation, Comparative Analysis
Were the lessons derived from the adaptive management process have been documented, shared with key partners and internalized by partners?	Agreement of interview feedbacks and evidence from document review	PIRs, AWPs, Board Meeting Munities, Lessons Learned, KIIs	Triangulation, Comparative Analysis
Communications and Knowledge management:			
Is communication regular and effective? Are there key stakeholders left out of communication? Are there feedback mechanisms when communication is received? Does this communication with stakeholders contribute to their awareness of project outcomes and activities and investment in the sustainability of project results?	Agreement of interview feedbacks and evidence from document review, appropriate feedback tools	PIRs, AWPs, Board Meeting Minutes and other documents, KIIs	Triangulation, Comparative Analysis
Are proper means of communication established or being established to express the project progress and intended impact to the public (is there a web presence, for example?	Agreement of interview feedbacks and evidence from document review	PIRs, AWPs, Board Meeting Minutes and other documents, KIIs	Triangulation, Comparative Analysis

Or did the project implement appropriate outreach and public awareness campaigns?)			
What are the knowledge activities/products developed (based on knowledge management approach approved at CEO Endorsement/Approval)?	Agreement of interview feedbacks and evidence from document review	PIRs, other documents, KIIs	Triangulation
Sustainability: To what extent are there financial, institutional, socio-economic, and/or environmental risks to sustaining long-term project results?			
Risk management:			
Were the risks identified in the Project Document, Annual Project Review/PIRs and the ATLAS Risk Management Module are the most important? And are the risk ratings applied are appropriate and up to date? If not, explain why?	Evidence of adequate risk identification	ProDoc, Annual Project Review/PIRs, ATLAS Risk Management Module, KIIs	Triangulation, Comparative Analysis
Financial Risks to Sustainability:			
What is the likelihood of financial and economic resources not being available once the GEF assistance ends (consider potential resources can be from multiple sources, such as the public and private sectors, income generating activities, and other funding that will be adequate financial resources for sustaining project's outcomes)?	Agreement of interview feedbacks and evidence from document review	KIIs, PIRs, other documents (strategic plans if available)	Triangulation
Have financial and economic instruments and mechanisms been established to ensure the ongoing benefits once the GEF assistance ends (i.e., from the public and private sectors, income generating activities, and market transformations to promote the project's objectives)?	Agreement of interview feedbacks and evidence from document review	KIIs, PIRs, other documents (strategic plans and capacity development frameworks if available)	Triangulation, Review
Socio-economic Risks to Sustainability			
Are there any social or political risks that may jeopardize sustainability of project outcomes?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs,	Triangulation, Comparative Analysis
What is the risk that the level of stakeholder ownership (including ownership by governments and other key stakeholders) will be insufficient to allow for the project outcomes/benefits to be sustained? Do the various key stakeholders see that it is in their interest that the project benefits continue to flow?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs	Triangulation, Comparative Analysis
Is there sufficient public / stakeholder awareness in support of the long-term objectives of the project?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs	Triangulation, Comparative Analysis
Are lessons learned being documented by the Project Team on a continual basis and shared/ transferred to appropriate parties who could learn from the project and potentially replicate and/or scale it in the future?	Agreement of interview feedbacks and evidence from document review	KIIs, Lessons Learned Reports, Project Website	Triangulation, Comparative Analysis
Institutional Framework and Governance Risks to Sustainability:			
Do the legal frameworks, policies, governance structures and processes pose risks that may jeopardize sustenance of project benefits?	Agreement of interview feedbacks and evidence from document review	KIIs, review of Legal Frameworks and Policies	Triangulation, Comparative Analysis
Are the required systems/ mechanisms for accountability, transparency, and technical knowledge transfer in place?	Agreement of interview feedbacks and evidence from document review, evidence of existence of systems/mechanisms	KIIs, document review	Triangulation, Comparative Analysis

Has the project developed strong institutional capacity (systems, structures, staff, expertise, etc.) that are likely to be self-sufficient after the project closure?	Agreement of interview feedbacks and evidence from document review	KIIs, PIRs, other government reports	Triangulation, Comparative Analysis
Environmental Risks to Sustainability:			
Are there any environmental risks that may jeopardize sustenance of project outcomes?	Agreement of interview feedbacks and evidence from document review	KIIs, FGDs, Document Review	Triangulation, Comparative Analysis

Annex 3: Theory of Change (ToC) Diagram (source: the ProDoc)



Annex 4: Questionnaire or Interview Guide Used for the Data Collection

Tool 1: Guide for KII with UNDP, PMU, PSC, TAC		
Place (online / venue)		
Date		
Interviewee type (UNDP, PMU, PSC, TAC)		
Interviewee/s		
Name	**Title**	**Mobile number**
Questions and findings		
General: Role in the project		
Relevance:		
a) Did the project prove relevant for your capacities? b) Was the project relevant for the country? c) Was the design of the project relevant? In what aspects? How well does the project relate/feed into the priorities at local, national or internal levels? d) Were lessons learned from other relevant projects incorporated into the project design? e) Are there any aspects of the design that could have been done differently to make the project more relevant/appropriate?		
Effectiveness:		
a) Does new partnership mechanisms with funding for gender friendly and sustainable management solutions of natural resources, ecosystem services, chemicals and waste established at national level? b) To what extent did the capacity of national and local systems have enhanced to assess, plan, and implement sustainable and mercury-free interventions in the ASGM sector? c) Does enabling environment created through improved national policies and regulatory frameworks for ASGM and mercury phase-out in the ASGM sector? d) Are loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners? e) Are ASGM miners being supported in their formalization processes leading to more sustainable income opportunities and safer working conditions? f) Does route to market for mercury-free gold improved/established? g) Are Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM? h) Is the overall project management effective and will lead to achievement of all the components at the stipulated timeframe? i) To what extent have the required financial, technical and technological support been delivered for the ASGM sites?		
Progress towards results: To what extent have the expected outcomes and objectives of the project have been achieved thus far?		
a) Do you believe the project is on track to achieve all its planned outcomes? b) If no, what are some of the improvements needed to enhance timely achievement of all the project outcomes? c) Does the progress so far have led to or could in the future catalyse beneficial development effects (i.e., income generation, gender equality and women's empowerment, improved governance etc…)? d) Did progress vary with in the project sites?		
Efficiency:		
a) Have all project activities been implemented in a timely fashion? Were there delays worth mentioning? b) What are some of the factors that have affected progress towards planned results and outcomes? c) Have all available resources been allocated in a manner that enhances value for money?		

Sustainability: To what extent are there financial, institutional, socio-economic, and/or environmental risks to sustaining long-term project results?
a) What is the level of project ownership among the different stakeholders, at national and local levels? And what can be done to improve the ownership? b) Can the project activities/interventions be sustained beyond the life of the project? How? c) What is the likelihood of financial and economic resources not being available once the GEF assistance ends? d) What opportunities for financial sustainability exist? e) Has there been establishment of financial and economic instruments to ensure the ongoing flow of benefits once GEF assistance ends? f) What possible solutions and recommendations would ensure the sustainability of all project components? g) Do you have exit strategy?
Gender:
a) How were the considerations of gender/youth/diversity/vulnerable addressed by the project and what recommendations would you suggest for future similar projects?
Adaptive Management
a) Are there particular observable changes in design/approach during project implementation? If yes, list them b) How have these changes enhanced the delivery of project design? c) What synergies of partnership created at the ground between the project and other initiatives (other funding agencies/implementing partners, government partners, local partners including private sector)? d) Were M&E and adaptive management applied as per plan and how effective are they?
Technology and Communication:
a) What type of technology are being implemented for Mercury free Gold processing? b) Are the technologies applied effective and produce quality product? c) Were the communications (including knowledge products) of the project effective? d) Were project results, experiences, lessons-learned and best practices are captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and global dissemination?
LL and Recommendations:
a) What are the lessons learned from the achievements and weaknesses of the project? b) What are your recommendations for future interventions?
Other notes: Do you have any other comments?
End, thank you for your time.

Tool 2: Guide for KII with Ministries and other stakeholders		
Place (online / venue)		
Date		
Interviewee type (Ministries, Government agencies, other Development Partners)		
Interviewee/s		
Name	**Title**	**Mobile number**

Questions and findings
General
a) How has your institution been involved in this project? (focus on specific roles)? b) What are some of the project activities that you have been involved in implementation to date? c) Are there any specific outputs expected from you? If yes, what is the status? d) Are the outputs on track? If no, what are the reasons
Relevance: Did the project proved relevant to your needs and capacities? If not why? Were you included in feedback processes working along with project staff on updating design and implementation actions?
a) Are the project activities aligned to your institutional mandates/needs? b) If not, what can be done to enhance your institution's mandate relating to the project? c) How well does the project relate/feed into the priorities at local, national or internal levels? d) Is the project relevant to the country's (i) environment sector; (ii) development and other sectors; (iii) to your organization and the work that you do? e) What was the nature and extent of your institution's participation in the IMKA project design? f) Were lessons learned from other relevant projects incorporated into the project design? g) Are there any aspects of the design that could have been done differently to make the project more relevant/appropriate?
Effectiveness: What were the helping and hindering factors for the implementation? And, how did they affect progress towards meeting project's planed results and objective?
a) How has the project design enhanced/hindered the delivery of your outputs? b) What are some of the observable factors attributed to the project interventions? c) What interventions have been made to try and address these factors? d) Are you aware about the capacity development strategy that was to be developed by the project? To what extent were the technical and institutional capacities enhanced at national and local levels (including officials, experts and artisan miners)? e) How effective was the project's public awareness campaign? f) Are loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners? g) Are ASGM miners being supported in their formalization processes leading to more sustainable income opportunities and safer working conditions? h) Does route to market for mercury-free gold improved/established? i) Are Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM? j) Is the overall project management effective and will lead to achievement of all the components at the stipulated time frame?
Progress towards results: To what extent have the expected outcomes and objectives of the project have been achieved thus far?
a) What are some of the notable project outcomes and achievements to date? b) Do you believe the project is on track to achieve all its planned outcomes? c) If no, what are some of the improvements needed to enhance timely achievement of all the project outcomes? d) Does the progress so far have led to or could in the future catalyse beneficial development effects (i.e., income generation, gender equality and women's empowerment, improved governance etc…)?
Efficiency:
a) Have all project activities been implemented in a timely fashion? Were there delays worth mentioning? b) What are some of the factors that have affected progress towards planned results and outcomes? c) Have all available resources been allocated in a manner that enhances value for money?
Sustainability: To what extent are there financial, institutional, socio-economic, and/or environmental risks to sustaining long-term project results?

a) What is the level of project ownership among the different stakeholders, at national and local levels? And what can be done to improve the ownership?
b) Can the project activities/interventions be sustained beyond the life of the project? How?
c) What is the likelihood of financial and economic resources not being available once the GEF assistance ends?
d) What opportunities for financial sustainability exist?
e) Has there been establishment of financial and economic instruments to ensure the ongoing flow of benefits once GEF assistance ends?
f) What possible solutions and recommendations would ensure the sustainability of all project components?

Gender:

a) How were the considerations of gender/youth/diversity/vulnerable addressed by the project and what recommendations would you suggest for future similar projects?

Adaptive Management

a) Are there particular observable changes in design/approach during project implementation? If yes, list them
b) How have these changes enhanced the delivery of project design?
c) What synergies of partnership created at the ground between the project and other initiatives (other funding agencies/implementing partners, government partners, local partners including private sector)?
d) Were M&E and adaptive management applied and how effective are they?

Technology and Communication:

a) What type of technology are being implemented for Mercury free Gold processing?
b) Are the technologies applied effective and produce quality product?
c) Were the communications (including knowledge products) of the project effective?
d) Were project results, experiences, lessons-learned and best practices are captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and global dissemination?

LL and Recommendations:

a) What are the lessons learned from the achievements and weaknesses of the project?
b) What are your recommendations for future interventions?

Other notes: Do you have any other comments?

End, thank you for your time.

Tool 3: Guide for KII with Financial Institutions/Banks		
Place (online / venue)		
Date		
Interviewee type (Financial Institutions/Banks)		
Interviewee/s		
Name	**Title**	**Mobile number**
Questions and findings		
General		

a) How has your institution been involved in this project? (focus on specific roles)?
b) What are some of the project activities that you have been involved in implementation to date?

c) Are there any specific outputs expected from you? If yes, what is the status?
d) Are the outputs on track? If no, what are the reasons

Relevance: Did the project proved relevant to your needs and capacities? If not why? Were you included in feedback processes working along with project staff on updating design and implementation actions?

a) Are the project activities aligned to your institutional mandates/needs?
b) If not, what can be done to enhance your institution's mandate relating to the project?
c) How well does the project relate/feed into the priorities at local, national or internal levels?
d) Is the project relevant to the country's (i) environment sector; (ii) development and other sectors; (iii) to your organization and the work that you do?
e) What was the nature and extent of your institution's participation in the IMKA project design?
f) Were lessons learned from other relevant projects incorporated into the project design?
g) Are there any aspects of the design that could have been done differently to make the project more relevant/appropriate?
h) How is your institution best place to address the unique needs of mining communities, and specifically women led groups?

Effectiveness: What were the helping and hindering factors for the implementation? And, how did they affect progress towards meeting project's planed results and objective?

a) How has the project design enhanced/hindered the delivery of your outputs?
b) Are you aware about the capacity development strategy that was to be developed by the project? To what extent were the technical and institutional capacities enhanced at national and local levels (including officials, experts and artisan miners)?
c) Are loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners?
d) Are ASGM miners being supported in their formalization processes leading to more sustainable income opportunities and safer working conditions?
e) Does route to market for mercury-free gold improved/established?
f) What financial products have you developed to target this group of miners (number and type of products)?
g) Has the training programs enhanced the capacity of your staff members to deal effectively with mining solutions?
h) How many financing applications have you received from the miners? And how many are approved grant?
i) Is the overall project management effective and will lead to achievement of all the components at the stipulated time frame?
j) Are there any innovative measures that have been identified to further the financial support?
k) Has your institution given any capacity building support to ASGM groups to change into bankable institutions? How effective was the support?
l) Have you ever documented potential ASGM activities, goods and services that financial institutions can lend?
m) Have you developed financial products tailored to ASGM sector needs?

Progress towards results: To what extent have the expected outcomes and objectives of the project have been achieved thus far?

a) What are some of the notable project outcomes and achievements to date?
b) Do you believe the project is on track to achieve all its planned outcomes?
c) If no, what are some of the improvements needed to enhance timely achievement of all the project outcomes?
d) Does the progress so far have led to or could in the future catalyse beneficial development effects (i.e., income generation, gender equality and women's empowerment, improved governance etc…)?

Efficiency:

a) Have all project activities been implemented in a timely fashion? Were there delays worth mentioning?
b) What are some of the factors that have affected progress towards planned results and outcomes?
c) Have all available financial resources been allocated in a manner that enhances value for money?

Sustainability: To what extent are there financial, institutional, socio-economic, and/or environmental risks to sustaining long-term project results?

a) What is the level of project ownership among the different stakeholders, at national and local levels? And what can be done to improve the ownership?
b) Can the project activities/interventions be sustained beyond the life of the project? How?

c) What is the likelihood of financial and economic resources not being available once the GEF assistance ends?
d) What opportunities for financial sustainability exist?
e) Has there been establishment of financial and economic instruments and mechanisms to ensure the ongoing flow of benefits once GEF assistance ends?
f) What possible solutions and recommendations would ensure the sustainability of all project components?

Gender:

a) How were the considerations of gender/youth/diversity/vulnerable addressed by the project and what recommendations would you suggest for future similar projects?

Adaptive Management

a) Are there particular observable changes in design/approach during project implementation? If yes, list them
b) How have these changes enhanced the delivery of project design?
c) What synergies of partnership created at the ground between the project and other initiatives (other funding agencies/implementing partners, government partners, local partners including private sector)?
d) Were M&E and adaptive management applied and how effective are they?

Technology and Communication:

a) What type of technology are being implemented for Mercury free Gold processing?
b) Are the technologies applied effective and produce quality product?
c) Were the communications (including knowledge products) of the project effective?
d) Were project results, experiences, lessons-learned and best practices are captured, published, and taken up by the GEF GOLD Global Dissemination Platform for national and global dissemination?

LL and Recommendations:

a) What are the lessons learned from the achievements and weaknesses of the project?
b) What are your recommendations for future interventions?

Other notes: Do you have any other comments?

End, thank you for your time.

Tool 4: Guide for FGDs with Beneficiaries		
Place		
Date		
Interviewee type (Male, Female)		
Interviewee/s		
Name	**Title**	**Mobile number**
Questions and findings		
General: Involvement in the project		
Relevance: Did the project proved relevant to your needs and capacities? If not why?		
a) How well does the project relate/feed into the priorities at local, national or internal levels? b) Is the project relevant to the country?		
Effectiveness:		
a) How effective were the training programmes on mercury free technologies?		

b) How effective were the trainings on the production of bankable business plans?
c) What was innovative in the project for you?
d) Did you observe improvements in Gold production?
e) Have you participated in any awareness campaign and how effective were they?
f) Did you receive any knowledge products? Were they useful?
g) What were the helping and hindering factors for the implementation?
h) Are you aware about the capacity development strategy that was to be developed by the project? To what extent were the technical and institutional capacities enhanced at national and local levels (including officials, experts and artisan miners)?
i) Are loans for the purchase of mercury-free processing equipment/investments are accessible to legalized ASGM miners?
j) Are ASGM miners being supported in their formalization processes leading to more sustainable income opportunities and safer working conditions?
k) Does route to market for mercury-free gold improved/established?
l) Are Miners located in the mining communities supported by the project are aware of the dangers of mercury and ways to reduce its use in ASGM?
m) Is the overall project management effective and will lead to achievement of all the components at the stipulated timeframe?
n) Have mercury free Gold processing plants been established?
o) Did the project lead to equal opportunities for men and women? If yes how? and if not why?

Progress towards results: To what extent have the expected outcomes and objectives of the project have been achieved thus far?

a) What are some of the notable project outcomes and achievements to date?\
b) Do you believe the project is on track to achieve all its planned outcomes?
c) If no, what are some of the improvements needed to enhance timely achievement of all the project outcomes?
d) Does the progress so far have led to or could in the future catalyse beneficial development effects (i.e., income generation, gender equality and women's empowerment, improved governance etc…)?

Efficiency:

a) Were there delays in financial, technical and technological support process?
b) Are you happy with the interaction with the project team?
c) Have all available resources been allocated in a manner that enhances value for money?

Sustainability: To what extent are there financial, institutional, socio-economic, and/or environmental risks to sustaining long-term project results?

a) What is the level of project ownership among the different stakeholders, at national and local levels? And what can be done to improve the ownership?
b) Can the project activities/interventions be sustained beyond the life of the project? How?
c) What is the likelihood of financial and economic resources not being available once the GEF assistance ends?
d) What opportunities for financial sustainability exist?
e) Has there been establishment of financial and economic instruments to ensure the ongoing flow of benefits once GEF assistance ends?
f) What possible solutions and recommendations would ensure the sustainability of all project components?

Gender:

a) How were the considerations of gender/youth/diversity/vulnerable addressed by the project and what recommendations would you suggest for future similar projects?

Adaptive Management

a) What synergies of partnership created at the ground between the project and other initiatives (other funding agencies/implementing partners, government partners, local partners including private sector)?
b) How effective was the M&E? Did the project team visit you often?

Technology and Communication:
a) What type of technology are being implemented for Mercury free Gold processing? b) Are the technologies applied effective and produce quality product? c) Were the communications (including knowledge products) of the project effective?
LL and Recommendations:
a) What are the lessons learned from the achievements and weaknesses of the project? b) What are your recommendations for future interventions?
Other notes: Do you have any other comments?
End, thank you for your time.

Tool 5: Field Observation Checklist		
Place		
Date		
Site		
Interviewee		
Name	**Title**	**Mobile number**
Questions and findings		

1. Administrative Details
    a. Availability of site office …….
    b. Registration details (type and year of registration) ……..……
    c. Availability of permits/licences
        i. Processing Licences ……
        ii. Mining Licence/Permit ……..…….
        iii. EIA Licences ……..……
    d. Records of production ……
    e. General Book keeping ……..…….
    f. Training Records …….
2. Technologies available at site
    a. Mercury free Gold processing technologies
    ……
    b. Technologies for safe mercury handling
    …….
3. Waste Management measures at site
    a) General waste
    ……..…….
    a. Tailings ……..……..…….
    b. Availability of waste management plans
    …….
4. How many beneficiaries are using the technologies?
    …….
5. Estimated mercury discharge prevented
    ……..……
6. Are the mercury free Gold processing technologies effective and give good quality product?
    …….

7. Are there concerns in using the Mercury free technologies?
   ……..
8. Other relevant comments/observations/recommendations
   …….

End, thank you for your time.

Annex 5: Ratings Scales

Ratings for Progress Towards Results: (one rating for each outcome and for the objective)

6	Highly Satisfactory (HS)	The objective/outcome is expected to achieve or exceed all its end-of-project targets, without major shortcomings. The progress towards the objective/outcome can be presented as "good practice".
5	Satisfactory (S)	The objective/outcome is expected to achieve most of its end-of-project targets, with only minor shortcomings.
4	Moderately Satisfactory (MS)	The objective/outcome is expected to achieve most of its end-of-project targets but with significant shortcomings.
3	Moderately Unsatisfactory (HU)	The objective/outcome is expected to achieve its end-of-project targets with major shortcomings.
2	Unsatisfactory (U)	The objective/outcome is expected not to achieve most of its end-of-project targets.
1	Highly Unsatisfactory (HU)	The objective/outcome has failed to achieve its midterm targets, and is not expected to achieve any of its end-of-project targets.

Ratings for Project Implementation & Adaptive Management: (one overall rating)		
6	Highly Satisfactory (HS)	Implementation of all seven components – management arrangements, work planning, finance and co-finance, project-level monitoring and evaluation systems, stakeholder engagement, reporting, and communications – is leading to efficient and effective project implementation and adaptive management. The project can be presented as "good practice".
5	Satisfactory (S)	Implementation of most of the seven components is leading to efficient and effective project implementation and adaptive management except for only few that are subject to remedial action.
4	Moderately Satisfactory (MS)	Implementation of some of the seven components is leading to efficient and effective project implementation and adaptive management, with some components requiring remedial action.
3	Moderately Unsatisfactory (MU)	Implementation of some of the seven components is not leading to efficient and effective project implementation and adaptive, with most components requiring remedial action.
2	Unsatisfactory (U)	Implementation of most of the seven components is not leading to efficient and effective project implementation and adaptive management.
1	Highly Unsatisfactory (HU)	Implementation of none of the seven components is leading to efficient and effective project implementation and adaptive management.

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

Annex 6: MTR Mission Itinerary

Date	Time	Activity	Venue	Responsibility
Key informant interview				
Thursday 23rd Feb 2023	1:00pm	Arrival of the International Consultant	Nairobi	Yilikal Addisu
Friday 24th February 2023	9:00pm-12pm	KII with PMU staff	Nairobi, NHIF Building	Yilikal Addisu
Monday 27th February to Wednesday 1st March 2023	9:00am-12:00pm 1:00pm-5:00pm	KII with PSC, UNDP staff, TAC, CTA	Nairobi	Yilikal Addisu
Wednesday 1st March 2023	9:00am-12:00am	KII with CEJAD	Nairobi	Aron Kecha
Friday 3rd March 2023	6:00pm	Departure of the International Consultant	Addis Ababa	Yilikal Addisu
Thursday 9th March 2023	8:30am-10:00am	KII with UNDP Regional Technical Specialist	Online	Aron Kecha
Tuesday 14th March 2023	3:00pm-4:00pm	State Department of Mining	Online	Yilikal Addisu and Aron Kecha
Wednesday 15th March 2023	8:00am-9:00am	National Environment Complaints Committee	Online	Yilikal Addisu
Field Mission				
Monday 13th Feb 2023	2pm	Fly to Kisumu and travel to Kakamega		Aron Kecha
Tuesday 14th Feb 2023	9:00 pm – 10:30 pm	Consultations with AMC Committee-Kakamega	Regional Mining Office	Samuel Kiptoo (RMO)/ Patrick Kiprono (organizers) Aron Kecha (interviewer)
	11.00 – 12.30	KII with additional county Officers		Samuel Kiptoo (organizers) Aron Kecha (interviewer)
	2.00pm – 5:0 pm	FGD with Beneficiaries		Grace Owitti)/ Patrick Kiprono (organizers) Aron Kecha (interviewer)
Wednesday 15th Feb 2023	9.00 a.m. -10.30 am	KII with Financial Institutions		Patrick Kiprono (organizers) Aron Kecha (interviewer)
	11 am -4 pm	Site Visits and KII (Mwangaza mining, Association of Miners)		Grace Owitti)/ Patrick Kiprono (organizers) Aron Kecha (interviewer)
	5pm	Travel to Vihiga by Road		

Date	Time	Activity	Venue	Responsibility
Key informant interview				
Thursday 16th Feb 2023	9:00 pm – 11:00 pm	Consultations with AMC Committee- Vihiga		Samuel Kiptoo (RMO) (organizers) Aron Kecha (interviewer)
	11.30 - 1300	KII with Financing Entity		Patrick Kiprono (organizers) Aron Kecha (interviewer)
	2.00pm – 5:0 pm	FGD with Beneficiaries		Grace Owitti/ Patrick Kiprono (organizers) Aron Kecha (interviewer)
Friday 17th Feb 2023	9.00 a.m. -11 am	KII with County Officials		Patrick Kiprono (organizers) Aron Kecha (interviewer)
	11.30 – 5.00 pm	Site Visits and KIIs		Grace Owitti/ Patrick Kiprono (organizers) Aron Kecha (interviewer)
Saturday Feb 18th 2023	**Travel to Migori County**			
Monday 20th Feb 2023	9.00a.m-11:00pm	Consultations with Migori AMC		Joshua Boiwo (RMO)/ Sharone Chelangat (organizers) Aron Kecha (interviewer)
	11.30 -13:00 pm-4:00pm	Consultation with regional Mining Office		Joshua Boiwo (RMO) (organizers) Aron Kecha (interviewer)
	2:00-5:00	Field visit and FGDs at OSIRI Matanda		Sharone Chelangat (organizers) Aron Kecha (interviewer)
Tuesday 21st Feb 2023	8:00am – 10:00am	Meeting with Financing entities		Patrick Kiprono (organizers) Aron Kecha (interviewer)
	10:30 am – 1:00 pm	FGDs at Mikei		Sharone Chelangat (organizers) Aron Kecha (interviewer)
Wed 22nd Feb 2023	8:00 am – 2:00 pm	Field visits to Kehancha		Sharone Chelangat (organizers) Aron Kecha (interviewer)
	2pm	Travel To Narok-Lolgorian - Road		
Thursday 23rd Feb 2023	8:00am – 10:30pm	Meeting with Narok AMC		Joshua Boiwo (RMO) (organizers) Aron Kecha (interviewer)
	11:00-5 pm	Field Visit and FGDs		Sharone Chelangat (organizers) Aron Kecha (interviewer)
Friday 24th Feb 2023	8-4pm	Field Visit and FGDs		Sharone Chelangat (organizers) Aron Kecha (interviewer)
Saturday Feb 25th 2023	Travel to Kisumu by Road Flight to Nairobi			

Annex 7: List of Persons Interviewed

PROJECT PSC MEMBERS		
No.	**Name**	**Designation**
1	Washington Ayiemba	Program Officer UNDP
2	Mayiani Saino	Project Manager
PROJECT TECHNICAL COMMITTEE		
No.	**Name**	**Institution**
1	Marcellah Ajiambo	NEMA HQ
2	Reagan Awino	NEMA
3	Amos Kiplimo	National Environment Complaints Committee
4	Griffins Ochieng	CEJAD
5	Joshua Boiwo	State Department for Mining
6	Samuel Too	State Department for Mining
7	Thomas Kipngeny	State Department for Mining
1	Convine Omondi	Chief technical Advisor
2	Kiprono Patrick	Project Finance
3	Sharon Chelagat	Project Assistant
4	Kathy Njuguna	Gender Officer
5	Ruth Epwoka	Communications Officer
6	Grace Awiti	Policy lead
UNDP OFFICERS		
No.	**Name**	**Designation**
1	Ms. Jie Pan	UNDP-NCE Technical Adviser
2	Everlyn Koech	Team Leader for Environmental Resilient
3	Valerie Munyeti	Facilitator of the MTR
No.	**Name**	**Institution**
1	Samwel Too	State Department of Mining
2	Jacob Mutua	State Department of Mining
3	Bjorn Aswa	County Government
4	Michael Shimanyula	County Government
5	Evans Obonyo	County Government
6	Cycliff Ochieng	Environment Officer -
7	Mary Alwanyi	Artisanal Mining Committee
8	Victorine Shikutwa	Artisanal Mining Committee
9	Timothy Mukoshi	Kakamega County Mining Associations
KAKAMEGA COUNTY		
No.	**Name**	**Institution**
1	Samwel Too	Regional Mining Officer, State Department of Mining
2	Jacob Mutua	Regional Mining Inspector, State Department of Mining
3	Bjorn Aswa	County Government,County Youth and Gender officer
4	Michael Shimanyula	County Government ,Environment officer- County
5	Evans Obonyo	Public Health office
6	Cycliff Ochieng	Environment Officer - NEMA

7	Mary Alwanyi	Artisanal Mining Committee
8	Victorine Shikutwa	Artisanal Mining Committee
9	Timothy Mukoshi	Chair. Kakamega County Mining Associations
MIGORI COUNTY		
1	Joshua Boiwo	State Department of Mining
2	Danstan Siringi	State Department of Mining
3	Maurice Amalemba	State Department of Mining
4	Moses Marwa	Member, Artisanal Mining Committee
5	Kephers Ojuka	Chair, Artisanal Mining Committee
6	Bismark Onyando	Cordinator, Migori County Miners Association
7	Dorothy Achieng	Chair, Radienya Women Miner Group
8	James Siaji	County director, NEMA
9	Moses Marwa	Member Artisanal Mining Committee
10	Joseph Nyamuya	Secretary-KESTA mining
FINANCIAL INSTITUTIONS/BANKS		
No.	**Name**	**Institution/Designation**
1	Symon Kamore	SMEP
2	Amos Obura	Faulu Bank, Branch Manager
3	Arnest Kutswa	Equity Bank, Credit Manager
VIHIGA COUNTY		
No.	**Name**	Institution
1	Kevin Musienga	Ag Chief Officer, Environment and Energy County Government
2	Karani Chinzi	Compliance Officer- Environment County Government
3	Marion Kezegi	GIS Officer County Government
4	Solomon Omotoko	Deputy County Public health Officer County Government
5	Brenda Obura	Environment Officer - NEMA
6	Francis Ikinga	Chief Provincial Administration
NAROK COUNTY		
No.	**Name**	**Institution**
1	Jenipher Lolei	Chair ,Artisanal Mining Committee
2	Jaramba Simon	Farmers of Gold Chair
FOCUS GROUP DISCUSSION		
NAROK		
No.	**Group**	**Contact Person**
1	GOT Kabong'o	Wilson Samberu -Chair
2	Farmers of Gold	Simon Odoyo - Chair
3	Lower Meko Group	
4	Depoto Self-help Group	Simon Njerenu - Chair

MIGORI		
No.	**Group**	**Designation** **.**
1	OSIRI-MATANDA SACCO	Wilson Samberu - Chair
2	KESTA Mining	Joseph Nyamuya - Secretary
KAKAMEGA		
No.	**Group**	**Designation**
1	Inuka Women Mining Group	Meble Chanzu -Chair
2	Justus Khakhavo	Mwangaza Mining CBO -Chair
VIHIGA		
No.	**Group**	**Contact Person**
1	Vihiga Artisanal Mining Cooperative Society Ltd	Lumbasu Herbat Asena -Chairman

Annex 8: List of Documents Reviewed

No	Category	Documents Collected and Reviewed
1	Annual Plans	All Annual and Quarter Plans
2	Communication Strategy	Planet GOLD Kenya Communication Strategy 2020
3	Country Strategy and Policy related to the Project	Mining and Minerals Policy Popular Version 2016, Mining Act Simplified Version, National Environment Policy 2013
4	Financial Information	Public Procurement and Asset Disposal Act, Public Financial Management Act, Co-financing tracking, financial report from CO
5	GEF Indicators Tracking Sheet	GEF Indicators Tracking tool at baseline
6	Inception Report, SESP, risk log	SEST
7	List of related projects	National Action Plan for Artisanal and Small-scale Gold Mining in Kenya
8	PIF, Initiation Plan, ProDoc	Initiation Plan and ProDoc
9	Project Meeting Minutes	PSC, PMU, TAC and other project meeting minutes
10	Project Products, Assessments and Research Papers	Training Need Assessment. Guideline for designation of areas for ASGM; Guidelines for Health, Safety and Environment; Capacity Assessment; Assessment of existing Analytical, Consulting, Training, and Equipment resources; Gender Dimensions of the existing Policy and Regulatory Frameworks; Comprehensive Training Manual; ASGM Training Plan; Baseline Survey for the Selection of two Financial Entities; Report on Selected Project Groups and Sites, Mining Associations and their Demonstration/Processing sites and planetGOLD Mercury-Free Processing and Gravimetric Training Plants
11	Project Reports	PIR 2021 and 2022, Progress Reports
12	Socioeconomic Monitoring Data	Socio-economic Baseline
13	Stakeholder List and Contact Address	TAC Members nominated
14	Other relevant data and information	Gender Action Plan, National Climate Change Action Plan Second Implementation Status Report, planetGold Programme materials, prototype developed on financial mechanism

Annex 9: Signed UNEG Code of Conduct Form

Evaluators/Consultants:

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 limitations, findings and recommendations.
7. Should reflect sound accounting procedures and be prudent in using the resources of the evaluation.
8. Must ensure that independence of judgement is maintained and that evaluation findings and recommendations are independently presented.
9. Must confirm that they have not been involved in designing, executing or advising on the project being evaluated.

MTR Consultant Agreement Form

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

Name of Consultant: ____**YILIKAL ADDISU YAYEH**_____

Name of Consultancy Organization (where relevant): _____

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

Signed at _____**ADDIS ABABA**_____ (Place) on _____**10TH APRIL 2023**____ (Date)

Signature: ____  _____

MTR Consultant Agreement Form

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

Name of Consultant: _____**ARON KECHA**_____

Name of Consultancy Organization (where relevant): _____

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

Signed at _____**NAIROBI**_____ (Place) on _____**10TH APRIL 2023**____ (Date)

Signature: _____  _____

Annex 10: Signed MTR Draft Final Report Clearance Form

Midterm Review Report Reviewed and Cleared By:

Commissioning Unit (M&E Focal Point)

Name: _____

Signature: _____ Date: _____

Regional Technical Advisor (Nature, Climate and Energy)

Name: _____

Signature: _____ Date: _____

Annex 11: MTR Audit Trial

Annexed in a separate file.