

Project Evaluation Series

**Terminal evaluation of the project
“Disposal of obsolete pesticides including
persistent organic pesticides, promotion
of alternatives and strengthening
pesticides management in the Caribbean”**

**Project code: GCP/SLC/204/GFF
GEF ID: 5407**

Management response

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<p>Recommendation 1.</p> <p>To FAO and GEF.</p> <p>Get/grant no-cost extension for six to nine months to ensure completion of ongoing/pending activities and prepare a sustainable financing strategy/plan to which the project countries should commit.</p> <p>The project still has ongoing activities such as the disposal of PCBs, remediation of contaminated soils, and work on pesticide container management. The additional time could also be used to finalize and translate several knowledge products and publish them. The time should also be used to collaboratively prepare a sustainable financing strategy/plan with each regional institution and project country. No new activity (not planned originally) should be taken up.</p> <p><i>Timeframe: In the next six to nine months, starting immediately.</i></p>	Accepted	<p><i>We would like to note that 80% of the outputs expected were achieved, including the work on disposal of PCBs waste, so there is no need for this to be covered in the extension. However, we agree to a 6 month no-cost extension to complete some activities and support the better institutionalization of others. The following is proposed:</i></p> <ul style="list-style-type: none"> <i>i. Support the Suriname authorities to continue the pesticide-contaminated soil remediation, expanding the completed contaminated soil remediation pilot field trial.</i> <i>ii. Continue the development of strategies for the disposal / recycling of empty pesticide containers with national authorities and stakeholders.</i> <i>iii. Publication of knowledge products, training and communications materials developed under the project.</i> <i>iv. The draft Model Pesticide Legislation passed review by the 94th Special Meeting of the Caribbean Community (CARICOM) Council for Trade and Economic Development (COTED) Agriculture (8 October 2021) and forwarded to the CARICOM Legal Committee. The project, supported by the FAO Legal Unit, will follow-up with CARICOM, Organisation of Eastern Caribbean States (OECS), (Coordinating Group of Pesticide Control Boards of the Caribbean (CGPC), and country national authorities in the adoption of the model Bill and/or incorporation into / augmentation of current legislation / regulations.</i> <i>v. The 94th Special Meeting of the CARICOM Council for Trade and Economic Development (COTED)</i> 	<p>Project Coordinator (PC) / UWI / Suriname National Authority</p> <p>PC / National Authorities / CGPC</p> <p>FAO-SLC / Project Coordinator</p> <p>PC / FAO Legal Unit / CARICOM / OECS and National Authorities</p> <p>PC / FAO / Finance</p>	<p>Jan 2022</p> <p>March 2022</p> <p>March 2022</p> <p>March 2022</p> <p>March 2022</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p> <p>No</p>

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		<p><i>Agriculture (8 October 2021) endorsed the recommendations from the CGPC. The project will continue to work with project countries and regional partners to complete the development of sustainable financing strategies/plans for national pesticide regulatory authorities and the CGPC.</i></p> <p>vi. <i>Project countries currently update their inventory of obsolete pesticide stocks, demonstrating their buy-in of its importance. Most of them have challenges identifying a central store for the obstocks. The project along with stakeholders will continue consultation and training on enhancement of strategies to address/prevent/reduce the future accumulation of obsolete pesticides stocks and related waste.</i></p> <p>vii. <i>The project will continue to provide FAO Pesticide Registration Toolkit and pesticide regulatory management training to regional pesticide regulatory staff. During the period Jan – March 2022, training will be delivered on Toolkit use, biopesticides (microbials), biocides, dietary risks and food safety, and pollinator protection.</i></p> <p>viii. <i>In collaboration with CGPC and project country stakeholders, regional and national priorities for addressing Highly Hazardous Pesticides (HHPs) were identified. The project will work with the CGPC, project countries and FAO Pesticide Risk Reduction Group to develop and finalise national and regional HHPs risk reduction plans.</i></p> <p>ix. <i>During project implementation between May 2016 and June 2021, 6 countries have acted to</i></p>	<p>consultant / CARICOM /National Authorities</p> <p>FAO / Nat Authorities / CGPC</p> <p>FAO / CGPC / National Authorities</p> <p>FAO / CGPC / National Authorities</p> <p>FAO / CGPC / National Authorities</p>	<p>March 2022</p> <p>March 2022</p> <p>March 2022</p> <p>March 2022</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p>

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		<i>ban/suspend/restrict/phase out 33 HHPs. The project will continue to promote IPM, collate information on regional alternatives to HHPs and provide support to farmers and home gardeners to reduce use of HHPs using communication tools and virtual training as requested.</i>			
<p>Recommendation 2.</p> <p>To GEF project formulators and FAO.</p> <p>In project design and implementation of regional projects in the Caribbean, differences in contextual realities and capacities/resources among larger islands, land-based countries and smaller islands should be taken into account in the project strategy to ensure no country is left behind.</p> <p>Plan and implement pilot and training activities in countries with lower capacities or select countries in each category. Also, facilitate the involvement of large islands/project countries to share their experience and information to ensure fluent exchange of knowledge. Also, spread project activities among various countries, instead of focusing on two or three countries, when there are 11 project countries.</p> <p>Use existing national structures (e.g., pesticide control boards, committees, etc.)</p>	Accepted	<p>FAO agrees that while there are many similarities across the Caribbean, there are also important differences that need to be considered in order to optimize effectiveness of implementation. Under the project budget, it was not possible to do all activities in all countries.</p> <p>We would like to emphasise that there was no project country "left behind". In a continuous and open collaborative process, countries were selected/volunteered to implement specific project activities. Countries' priorities were extensively discussed during the 21st CGPC Annual Meeting and Project Planning meeting in June 2016 and subsequently regularly reviewed during annual Project Steering Committee meetings and CGPC Meetings.</p> <p>This project has engaged extensively with national and regional bodies throughout implementation.</p> <p>CGPC and CAHFSa and CARICOM have been key partners and are critical in ensuring sustainability of the project outcomes. Other collaborators include: the University of the West Indies (UWI), Caribbean Agricultural Research and Development Institute (CARDI) and the Inter-American Institute for Cooperation on Agriculture (IICA), who are all members of the Project Steering Committee</p>			

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<p>to engage, inform national stakeholders, and enable collaborations. Identify and communicate clearly the benefits from the regional project for each country. Regional project design/implementation should ensure the engagement of diverse national stakeholders in (beyond participating in events) and not only NPCs.</p> <p><i>Timeframe: All future project designs</i></p>		<p>(PSC) and are committed to the sustainable extension of activities implemented under the project.</p> <p>At the political level, annual updates were provided to the highest policy-making body in CARICOM related to agriculture - COTED-Agriculture. In every case, project submissions were approved and endorsed, demonstrating support at the highest levels for the project activities.</p> <p>Key lessons learned that would benefit design processes for future regional projects are:</p> <ol style="list-style-type: none"> i. Discussions with CARICOM and national governments at the policy level on possible options for sustainable funding of national regulatory authorities should include persons responsible for national Ministries of Finance and CARICOM finance experts from an early stage. ii. Project country priority and commitment must be confirmed at planning stage, reconfirmed at inception stage and regularly throughout implementation. Priorities can change in the event of a crisis or change of the political directorate resulting in lapses in commitment. iii. Inclusion of key regional bodies within the Project Steering Committee can be an important element in building an exit strategy at the end of the project. iv. The FAO procurement process can be lengthy. When engaging private companies in contracts or LOAs as Service Providers, the FAO procurement 			

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		<p>process should be efficient and time frame shortened. If not, FAO risks missing the time window when their services are available, resulting in project delays.</p> <p>v. Effective use of FAO’s normative authority can be a major advantage in the implementation of field programmes. For example, FAO Pesticide Registration Toolkit has been a vital tool and desktop resource to support comprehensive pesticide product registration application evaluation. The support of the FAO Development Law Service was also fundamental in the successful development of the model Pesticide Legislation.</p> <p>vi. Conducting “Training of Trainer” courses is no guarantee that recipients will go on to train colleagues. There is also frequent turnover of staff in countries. Some courses should be continuously delivered by regional educational institutions as part of an existing programme or syllabus.</p> <p>vii. During implementation of FAO regional project implementation, it is important that stakeholders, regional institutions and the wider public be kept aware of project activities utilizing communications tools such as newsletters, public participation in awareness activities, regional project update webinars and the issuance of frequent press releases and tweets.</p> <p>All the lessons learned and findings from evaluations are being captured since RLC / SLC aims to have a Knowledge</p>			

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		<p>Management repository that would be readily accessible to all FAO offices for future project development. The possibility to extend access to external partners is also envisaged since many new projects would be implemented through the new implementation modality OPIM.</p> <p>Workshops will be organized to share best practices and lessons learned, so they can be applied to ongoing and future projects.</p> <p>The SLC workspace has been re-organized as a more formal knowledge management repository, facilitating access by all teams of evaluations within FAO.</p>			
<p>Recommendation 3.</p> <p>To FAO.</p> <p>Prepare a sustainability and exit strategy for each regional/national institution and each project country collaboratively, and include the following:</p> <p>State the role of FAO in supporting/facilitating through TCPs, and/or linkages with GEF, and other projects to continue/strengthen activities on one or more components of the project, in the future (for at least the next four to five years);</p>	Partially accepted	<p>A key element of FAO’s exit strategy has been the engagement of regional bodies to continue to effectively support project goals in the long term.</p> <p>The CGPC, Executing Partner in the project, continues to have a critical role in enabling Caribbean countries to further the goals of the project, particularly in the areas of strengthening pesticide legislation and regulations, training of national regulatory authority personnel, leading harmonization of pesticide registration, guiding field testing of alternatives to HHPs, promoting expansion of farmer training and public awareness.</p> <p>FAO, a key partner of CGPC since its creation, will with this body, seek and take advantages of opportunities to link achievements gained in this project to ongoing and planned national and regional programmes and to</p>	PC / FAO / CGPC / CAHFS / CARICOM	June 2022	No

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<p>Define FAO’s role to be played in continuing activities on regional mechanisms, regional legislation etc., and</p> <p>Detail a feasible system/mechanisms or structures (with roles and responsibilities identified) required at the country level to inventory/collect and store obsolete pesticide in a central location, prevent accumulation of obsolete pesticides, collection and disposal of pesticide empty container management, sustainable financing, increased use of alternatives to HHPs, and adoption of legislation at the national level.</p> <p><i>Timeframe: In the next six to nine months, starting immediately.</i></p>		<p>transfer the results of the project to other GEF initiatives and other donor funded projects.</p> <p>FAO-SLC, in collaboration with the CARICOM, CAHSFA, project partners and beneficiary countries will also vigorously pursue institutionalization of gains made and help build alliances with resource partners for addressing priorities identified by the CGPC.</p> <p>All project country pesticide regulatory authorities participated directly in project implementation. Based on their continued engagement since project inception, they are committed to implementing all facets required for sound pesticide lifecycle management in the Caribbean.</p> <p>FAO will engage these authorities and key national stakeholders to provide technical support to the process of developing work plans for continued strengthening of pesticide life cycle management.</p> <p>The plans will include timelines, targets, identification of responsible personnel, identification of regional / international partners, possible sources of funding and also ensure that gender mainstreaming, environmental and social safeguards are incorporated into the planning / implementation process.</p> <p>Project countries may not be able to formally commit to the plans within the 6-month period of the project extension.</p> <p>The political engagement with CARICOM COTED and the endorsements received by this regional body go a long</p>			

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		way to encourage commitment of countries to continue this work.			
<p>Recommendation 4.</p> <p>To FAO.</p> <p>Projects should revisit the project results matrix (initially prepared at project design) and revise them periodically (e.g., at inception and or during MTE) as required/relevant and report accordingly.</p> <p>There is a lead time of two to four years to develop the GEF proposal, get approval from GEF and start implementation.¹ During this period, context, priorities, and governments might have changed. Additionally, the projects take four to five years to implement. Therefore, it is appropriate to revisit and tweak the results matrix (e.g., during the inception phase or after MTE) to ensure meaningful and efficient implementation and M&E. PIR reporting should be realistic and aligned to the activities and indicators including the revised one.</p> <p><i>Timeframe: All future projects</i></p>	Accepted	<p>Once a project is declared operational, the Project Task Force reviews the project document and proposes, at the inception workshop, any adjustments that they consider necessary to the work plan and the target results to take account of any evolution that may have occurred during the project approval process.</p> <p>This standard practice was followed for this project.</p> <p>Subsequently, Project Budgeted Annual workplans were presented, reviewed and endorsed at PSC, after being technically cleared by the PTF. During those meetings, implementation progress of each activity was scrutinized in detail, challenges identified, and alternative solutions collaboratively agreed upon and inserted into adjusted plans, which were then endorsed by meeting participants.</p> <p>While adjustments to work plans and target results were made in response to implementation realities, updates to the results matrix lagged during the first half of the project. This was due to a procedural bottleneck whereby the Project Coordinator (PC) did not have direct access to the necessary sections in the Field Project Management and Information System (FPMIS). This bottleneck was addressed by SLC in 2019. All PCs were granted direct</p>			

¹ It was informed that in GEF 7, the lead time was only 15 to 18 months from PIF to PRODOC to inception and is likely to be the same in GEF 8.

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		<p>access to FPMIS and were provided with training and information needed to ensure timely updates.</p> <p>SOPs instituted by Programme support at SLC have been developed to highlight key project management processes for efficient execution.</p> <p>Point 1: Planning: Establish the Project Scope and define the course of action required through efficient work planning which define the course of action required based on the budget, time and other resources required to attain the objective the project</p> <p>Point 2: Monitoring those processes required to track review and regulate the progress and performance of the project; Identify any areas in which adjustments are required and initiate discussion with relevant partner to implement the changes.</p> <p>Point 3: Quality assurance and risk evaluation and mitigation which ensure processes are effective and comply with quality requirements, Donor and FAO rules and regulation as well as organizational policies in addition to producing the desired outcome.</p>			
<p>Recommendation 5 to FAO: Follow-up on the approval of the pesticide legislation.</p> <p>FAO must follow up directly with CARICOM and through COTED and CAHFSA to facilitate that the regional model pesticide legislation goes through the approval process and the approved legislation is sent to member states. FAO can work through</p>	Partially Accepted	<p>It is important to recognize that the model pesticide legislation has already had an important impact on national processes to upgrade pesticide legislation. This is due to the high credibility of the model legislation and the collaborative process that guided its development which was:</p> <ul style="list-style-type: none"> i. based on a comprehensive review of existing pesticide legislation of all project countries 	PC/ CGPC / CAHFSA / FAO / National Authorities	June 2022	No

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<p>CAHFSA to encourage project countries to adapt/adopt the model legislation on pesticides at the country level and avoid any overlap with model regulation on chemicals² that is being reviewed by some project countries.</p> <p><i>Timeframe: In the next six to nine months</i></p>		<p>ii. guided by relevant international standards and codes</p> <p>iii. supported by international experts of LEGN with a broad experience of pesticide legislative frameworks globally.</p> <p>The following countries are actively working strengthen current pesticide legislation or adopt the Model developed in the project: Trinidad and Tobago, Belize, The Bahamas, Barbados, Saint Lucia, Dominican Republic and Grenada. Adittionally, Barbados and Grenada acceded to the Rotterdam Convention, facilitated through this project and will contribute to enhanced pesticide management in the region.</p> <p>Utilization of the updated model pesticide legislation is key. FAO-SLC will follow up the work of the CARICOM Legal Affairs Committee expected to convene in early 2022, providing technical resources under the guidance of LEGN. High-level support by Caribbean Agriculture Ministers was intentionally solicited by the project to ensure sustainability in pesticide lifecycle management.</p> <p>The CGPC and CAHFSA with the support of FAO, will ensure that countries are aware of their responsibility and have the capacity to meet requirements and obligations of pesticide-related standards and Conventions, by</p>			

² Model legislation on chemicals drafted by GEF 5558 does not exclude pesticides and thus it creates an overlap.

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		<p>requesting and facilitating relevant training activities for regulatory authorities.</p> <p>The issue of the “overlap” with pesticides and chemicals legislation is addressed in a document prepared by FAO and UNEP explaining the differences between the 2 types of legislation.</p> <p>This document has been presented to project country pesticide regulatory authorities by the FAO Legal Office in consultations during the development of the model pesticide legislation. It was also presented to the CARICOM-COTED- Ministers of Agriculture Meeting in October 2021.</p> <p>This document emphasizes the importance of having a separate and “distinct” pesticide legislation apart from chemicals legislation. Some countries indicated the desire to combine pesticide and chemicals legislation under one Act.</p> <p>FAO - SLC will revisit this issue in collaboration with the CARICOM Legal Committee, the Basel Convention Regional Centre (BCRC) and national authorities to ensure that the resulting country legislations complement each other.</p>			
<p>Recommendation 6.</p> <p>To FAO.</p> <p>Explore the possibility to create sub-regional mechanisms for pesticide registration and/or common inspection and control of imported pesticides, as</p>	Partially accepted	Harmonization of technical measures affecting trade in agricultural commodities within CARICOM is a major political imperative. Successive CGPC meetings for more than 20 years have confirmed the agreement of the technical authorities to work towards this. FAO in	FAO (NSP) / PC / CGPC / National Authorities		No

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<p>feasible, before scaling up at the regional level.</p> <p>With regional versus national sovereignty and countries following diverse systems (British, Spanish and Dutch), it may be easier to create a sub-regional mechanism for similar profile countries. For example, the nine OECS countries are similar smaller islands, English speaking and constrained by resources, capacities and structure.</p> <p><i>Timeframe: In the next 1 to 3 years</i></p>		<p>collaboration with CARICOM, OECS, CAHFSA and the CGPC will continue to pursue this regional harmonization.</p> <p>Both CARICOM and OECS structures can be leveraged to facilitate training in accordance with the harmonized tools (legislation, pesticide registration evaluation and pesticide inspector training) developed under this project, including training on implementation of the obligations under international multilateral environmental agreements and Conventions.</p> <p>The CGPC was strengthened by locating the Technical Secretariat in CAHFSA. No other regional mechanism with such a mandate exists in the Caribbean. Despite the diversity stated in the recommendation, the project developed one model legislation (adapted for the Dominican Republic), one regional pesticide inspector’s manual and conducted training for all regional pesticide registrars using the FAO Pesticide Registration Toolkit.</p> <p>FAO will continue to develop Toolkit modules, provide inspector training and update model legislation as required, while promoting and supporting efforts at regional harmonization and facilitating information/data collection and exchange.</p>			
<p>Recommendation 7.</p> <p>To FAO and GEF.</p> <p>Support countries to establish a sustainable national mechanism for collection and disposal of obsolete</p>	Partially accepted	<p>There is a mechanism. It is the responsibility of the national authority. FAO and the project have already done a lot of capacity development including training on conducting obsolete pesticide stock inventories, storage, safeguarding and repackaging of obsolete pesticide stocks, pesticide waste and empty pesticide containers.</p>	FAO / National Authorities / CGPC		No

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<p>pesticides and empty pesticide containers management.</p> <p>Through future projects, FAO should train countries in preventing the accumulation of obsolete pesticides and create a national mechanism for collection and disposal.³ For empty pesticide container management, FAO should facilitate establishing a national mechanism involving the environment, health, and agriculture ministries.</p> <p><i>Timeframe: In the next 1 to 3 years.</i></p>		<p>FAO has also directly engaged national stakeholders on the development of container management mechanisms in Barbados, St Kitts and Nevis, Antigua and Barbuda, Suriname, Guyana and Trinidad and Tobago.</p> <p>Furthermore, the CGPC, with whom we have an ongoing relationship, is charged with providing support to national authorities and coordinating among them. It is a regional forum which promotes the sound management of pesticides through information sharing and exchange and technical assistance aimed at implementation of legislation and international guidance documents such as the FAO-WHO International Code of Conduct on Pesticides Management.</p> <p>FAO, in a participatory manner, will provide the necessary guidance, for the development of national plans for the management of obsolete pesticide stocks and pesticide container management, including agencies from agriculture, health and environment and private sector participation.</p> <p>The collaboration between FAO, CGPC, national authorities and AGRIVALOR-Guadeloupe demonstrated and resulted in the collection of data / information required for consideration in the establishment of empty pesticide container management mechanisms. FAO will seek to strengthen that collaboration to ensure that</p>			

³ In the current project the training was only about managing existing stockpiles of obsolete pesticides.

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		<p>project countries establish mechanisms unique to their circumstances. This will be done by facilitating current country level situation analyses and formulation of specific recommendations. A participatory approach for the development of regional recommendations for recycling / disposal will be facilitated.</p> <p>FAO-SLC will continue to promote the WHO/FAO International Code of Conduct on Pesticide Management by convening national and regional webinars targeting pesticide industry and traders who should be capable of providing effective technical support, backed up by full product stewardship to end user level.</p> <p>This is particularly important in those countries with weaker national authorities and require additional technical capacity to effectively operate adequate regulatory schemes and advisory services.</p>			

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<p>Recommendation 8.</p> <p>To FAO and GEF.</p> <p>Private sector engagement should be a priority, specifically in the empty pesticide container management and promote alternatives to HHPs.</p> <p>Have a clear engagement strategy and involve the private sector from project design and/or inception, as feasible. The private sector would bring unique skill sets/perspectives and add value, including co-financing.</p> <p><i>Timeframe: All similar future projects</i></p>	Accepted	<p>This project has demonstrated the importance of early engagement of the private sector in achieving project goals. It would have benefitted from a clearer engagement strategy from the outset.</p> <p>In projects targeting strengthened pesticide management, engagement of the Bio pesticide or bio control industry is critical. This includes the identification of local and regional manufacturers of biopesticides and alternatives and fast-tracking registration of these and availability to farming communities.</p> <p>Waste management companies have a vital role in pesticide container management in the areas of recycling and disposal. FAO will work with the CGPC, and national authorities to engage waste management companies, identify challenges and facilitate initiatives to ensure that sound recycling and disposal practices are implemented.</p> <p>FAO-SLC supports the engagement of CropLife by FAO-HQ in the areas of obsolete pesticide disposal and container management. FAO-SLC, together with the CGPC will solicit FAO-HQ and CropLife to examine expansion of their empty container management work and promotion of alternatives to HHPs in the Caribbean, which is a relatively very small market.</p>			

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