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FAO/WHO MANAGEMENT RESPONSE TO THE CODEX TRUST FUND FINAL EVALUATION

Background

A final project evaluation on the FAO/WHO Project and Fund for Enhanced Participation in Codex (Codex Trust Fund) to evaluate the functioning and results of the Codex Trust Fund after ten and a half years of its 12 year lifespan, was carried out between August 2014 and March 2015 by an independent external evaluation team. The specific objectives of the evaluation were to:

1. Evaluate the result of the Codex Trust Fund against the stated objectives and expected outputs in the founding project document;
2. Identify and analyse the strengths and weaknesses of the Codex Trust Fund from both strategic and operational perspectives;
3. Identify lessons that could be learned from the operations and results of the Codex Trust Fund for similar projects in the future.

The full report of the final evaluation is available in CX/CAC 15/38/18-Add.3. The terms of reference for the final evaluation are included in Annex A of the final report. The Executive Summary in all Codex languages plus Russian is available in CX/CAC 15/38/18-Add.2.

FAO and WHO would like to express their appreciation to all those who contributed to the final evaluation through making themselves available to participate in interviews, on-line surveys, focus groups and country case studies.

Overall response to the Final Evaluation

FAO and WHO express their satisfaction with the results of the final evaluation. FAO/WHO believe that the evaluation was conducted in a reasonable and appropriate manner (within financial and time limitations), and followed UN guidelines for best practice in carrying out evaluations. The evaluation gathered information and perspectives from all stakeholder groups, and combined different methods to collect and analyse data and information. The findings of the evaluation elucidated both the positive impact of the Codex Trust Fund, as well as its limitations.

Despite the fact that the actual conduct of the evaluation got underway later than originally planned due to administrative delays in contracting the evaluation team, the final evaluation has been a valuable input to the design and development of the successor initiative to provide further support to countries for effective engagement in Codex. It should be noted that the 2014 Annual Report, 19th Progress Report and 2014 Monitoring Report had not been finalized prior to the end of the data collection phase of the evaluation. Information and data from these reports was not, therefore, taken into consideration in the evaluation.

FAO/WHO would like to make the following general comments with regard to the evaluation findings and results:

Adaptability of the Codex Trust Fund while retaining the strategic focus - Throughout the life of the current Codex Trust Fund, attention has been paid to ensuring the specific “niche” of the Trust Fund and adding value by targeting the funds to activities which were unique. This focus was in line, we believe, with the direction agreed with donors and beneficiary countries – recognising that the Codex Trust Fund is one

element of FAO and WHO's programme of work to enhance effective participation in Codex. From the outset, support to attend Codex meetings was a very unique addition to FAO and WHO support to countries. For this reason, there was a conscious focus on allocating resources first and foremost to supporting physical participation in Codex meetings in the first half of the CTF lifespan. As a result of a strategic re-positioning to meet the changing needs of beneficiary countries, and as a result of the findings of the Mid-term Review of the Trust Fund, resource allocations were modified to ensure that countries were benefiting from more Codex capacity-building to strengthen their participation and to enhance the scientific/technical input to Codex.

Support to Codex capacity-building in the strategic focus. During the life of the current Codex Trust Fund, FAO and WHO considered alternative approaches to rolling out Codex capacity-building supported by the Trust Fund, for example through supporting Codex training courses at national level in a single country. However, it was felt that the CTF's strategic focus in Codex capacity-building should remain on supporting FAO/WHO Codex training courses and workshops targeted at regions and sub-regions.

In kind support from FAO/WHO to the Codex Trust Fund - The evaluation team noted the considerable in-kind support provided by FAO and WHO officers, at HQ and Regional Office levels primarily, to support the core work of the CTF Secretariat in WHO, Geneva. This was a consequence of the nature of the CTF – being one initiative, among a range, and entering a field of FAO/WHO capacity development where there was on one hand already considerable knowledge/know-how, and on the other a keen need from FAO and WHO side to ensure that the CTF activities complemented and did not duplicate ongoing FAO/WHO support to Codex capacities and programmes on food safety capacity development.

Planning, financial reporting, monitoring and fund-raising - The observations and recommendations of the evaluation team on managing and implementing the CTF, e.g. planning, financial reporting, monitoring and fund-raising are welcome and are helpful in planning the successor initiative. The detailed analysis undertaken by the evaluation team, for example in the area of cost analysis of activities, can serve as a useful benchmark/reference for other ongoing work, as well as for the successor initiative.

Impact of CTF activities at country level – FAO/WHO note the limited evidence from the evaluation on the real impact of CTF activities at country level. It is recognized that this is due to a number of factors including: the difficulty in attributing changes at country level to CTF (rather than as a result of other interventions by FAO, WHO, other bilateral or multilateral actors and/or as a result of all these interventions taken together) and; the lack of baselines at country level against which to measure change.

Specific responses of FAO/WHO to the recommendations of the final evaluation appear below. The headings of the recommendations have been reproduced here for ease of reference, but readers are invited to refer to the full text of recommendations in either CX/CAC 15/38/18-Add.2 or CX/CAC 15/38/18-Add.3 as FAO/WHO responses under the headings may refer to different elements addressed in the full text of the recommendation.

Recommendation 1: Develop a Codex promotional and engagement strategy with the Codex Secretariat to advocate for national support for Codex programmes

FAO/WHO agree that advocating for national support to the Codex programme is important, needs a multi-pronged approach, and should be central to different activities in parallel. This includes using discussions with member countries, FAO and WHO governing bodies and regional conferences, activities to build national and regional food safety capacities, etc. These activities, and more, provide opportunities to increase knowledge and understanding of Codex and food safety, and ultimately gain political buy-in and support.

FAO and WHO also refer to the Codex communications strategy currently being developed by the Codex Secretariat, being tabled at the 38th session of the Codex Alimentarius Commission in July 2015, in support of the Codex Alimentarius Commission Strategic Plan 2014-2019. Rather than developing a separate promotional and engagement strategy for the Codex Trust Fund and its successor initiative (CTF2), FAO/WHO believe that the wisest course of action is to use various lines of advocacy as outlined above, and the Codex communications strategy, to respond to this recommendation of the final project evaluation. Furthermore, FAO and WHO note that the Codex communications strategy fully recognizes the primary role of the parent organizations in promoting Codex itself, as well as the Codex Trust Fund. One of the aims of CTF2 is to support countries in securing political and economic support for Codex activities among policy and decision-makers from key sectors and stakeholder groups. Messaging that goes out under the implementation of the Codex communications strategy could be easily "fine-tuned" with input from FAO/WHO to help achieve this aim, and can be used by countries in numerous ways to increase the awareness and

knowledge of Codex among policy/decision-makers and experts. Proceeding in this way will help ensure that any communications undertaken by the CTF2 builds on a comprehensive and strategic approach to Codex communications to increase political support for national Codex activities, rather than unnecessarily multiplying contacts with countries and fragmenting messaging.

With regard to raising the priority and profile of food safety within the two organizations, FAO and WHO continue to engage with Member States directly or through respective governing bodies to ensure support for food safety and Codex. WHO and FAO are increasingly talking on food safety in one single voice to be heard by the international community.

WHO and FAO drew the attention of Member States gathering at the second International Conference on Nutrition (ICN2) to the importance of food safety as an essential element for achieving food and nutrition security. For WHO, the choice of food safety as the theme of WHD 2015 should be considered as an exceptional effort to raise the profile of food safety nationally as well as internationally. Progress in FAO includes the unanimous support by the Committee on Agriculture in 2014, for the FAO Strategy for Improving food safety globally, which was further endorsed by the FAO Council in March 2015. It is also notable the importance given to food safety by governments and civil society at the Committee for Food Security (CFS), when negotiating the texts on Responsible Investment in Agriculture (RAI), and Framework for Action for Food Security and Nutrition in Protracted Crises (FFA).

Recommendation 2: Redefine programme objectives in light of evolving needs of eligible countries

FAO/WHO agree with this recommendation. FAO/WHO are of the opinion that the Codex Trust Fund was responsive to the need to adapt to the changing needs of developing countries. -Achievements and gaps in achievement were taken into account as the programme moved forward, and changes to the programme were made in a timely manner while respecting the internal requirements of FAO, WHO and the Codex process, and also ensuring that Codex members states had been fully consulted prior to implementing changes. Key considerations were the importance of maintaining the niche of the CTF, its uniqueness and ensuring its complementarity to parallel FAO and WHO programmes which build capacities in Codex and food safety. The needs of member countries were considered when defining eligibility and categories for support for physical participation in Codex sessions (Objective 1 of the current CTF), and when planning capacity development activities implemented (Objective 2). To ensure equity across regions, a proactive decision was taken by FAO/WHO that all capacity development activities should be kept at regional/sub-regional level, informed by the specific needs of groups of countries with common needs.

However, it is recognized that improvements can be made. The successor initiative could benefit from an iterative planning process that will allow for timely adjustments throughout the 12 year lifespan of CTF2, and the founding document itself can be revisited to ensure that it retains full relevance for the needs of countries throughout the entire period of the successor initiative (2016-2027). An iterative planning process has, therefore, been built into the planning of the successor initiative. This allows for periodic reviews (e.g. light management and operational reviews) to be carried out every 3-4 years and, on the basis of these, for revisions to be made to CTF2 as appropriate. An independent external evaluation will be carried out mid-way through the CTF2, and a final project evaluation will be carried out in Year 10 or 11.

At the same time, it should be noted that the needs and priorities of Codex members differ significantly between countries. This recognition has led to the tailor-made approach proposed for the successor initiative, described in more detail in a separate document (see CX/CAC 15/38/18-Add.5). This represents a continual progression to more targeted assistance.

Recommendation 3: Improve financial reporting

FAO/WHO agree with this recommendation which was already taken on board in the 2014 Annual Report. The Annual Report now includes a financial reporting table that details out expenditures for each calendar year broken down into: staff and administrative costs, expenditure by project objectives; monitoring and evaluation costs. Programme support costs (established at 13% on all contributions coming into WHO and agreed to by WHO member states in Resolution WHA34.17) for each calendar year are also clearly indicated. In-kind contributions from CTF donor countries have also been noted in the 2014 Annual Report. Both of these practices will continue in the future.

Similarly, every attempt will be made to estimate in-kind contributions by FAO and WHO staff.

Recommendation 4: Improve the cost analysis of the CTF

FAO/WHO agree that the cost analysis of project activities can be improved. This will allow for better tracking of cost per activity and allow for comparison between different approaches to identify approaches that provide the best value for money (e.g. paying full per diem to participants at a Codex training course versus contracting directly with a hotel for facilities, room and board for participants in a package). This would be particularly important in the initial stages of CTF2, when delivery mechanisms for the standard support available will be fully investigated. Discussions are currently underway with budget and finance officers in both WHO and FAO to see how the WHO and FAO budget and finance systems can be used to provide for cost analysis that can be used to monitor cost-effectiveness of different approaches to implementing activities without creating additional administrative work and/or having to create parallel systems outside the normally used budget and finance systems of the two organizations.

Throughout the implementation of CTF2, importance will continue to be placed on ensuring CTF2 targeted assistance is delivered in the most cost-effective way to ensure efficient and effective use of funds.

Recommendation 5: For effective participation, an approach that assesses both the individual delegate and country conditions needs to be in place

FAO/WHO agree with this recommendation. However, it should be noted that:

- 1) as 2015 is the final year of the current Codex Trust Fund, little can be done to implement this recommendation in the remaining implementation period of the CTF;
- 2) some aspects of the recommendation will be adequately addressed in CTF2 as there will be less support to physical participation in Codex meetings in isolation – such an element will be integrated into and be part of the overarching application process.

Assessing specific country conditions, how these conditions affect a country's ability to engage effectively in Codex, and how barriers to effective engagement in Codex can be addressed with assistance from FAO/WHO and financial support from CTF2, is at the heart of the approach being adopted in the successor initiative. So while the emphasis is on country capacity and the onus is on them to be accountable, it is recognised that there is a need to assess how effective individual delegates are performing and are enabled to participate. When choosing delegates to attend Codex sessions, countries will be encouraged to ensure continuity between sessions, and to avoid too high a turnover of delegates – i.e. too frequent use of new delegates.

FAO and WHO will also provide support and reflect on country's and individual's progressive performance (where supported by CTF2). As outlined in the project proposal tabled in document CX/CAC 15/38/18-Add.5, CTF2 will support twinning activities and Codex "coaching". Upon successful acceptance of their application, individuals who are nominated by their countries to benefit from these activity areas may be required to complete successfully the basic on-line Codex training (with issuance of a certificate).

The suggestions included in this recommendation including: moving to multi-year applications; flexible packages of assistance to meet the specific needs of a country or group of countries; engagement strategies with demonstrable outcomes and; provision of information on how the proposed role of CTF2 may complement national support and/or other sources of support, have all been taken on board in the development of the successor initiative. Robust application procedures and clear deadlines will be established and enforced.

Recommendation 6: Undertake an analysis in regards to country needs regarding increasing availability of scientific advice

FAO and WHO still see clear needs among member countries in terms of improving their scientific and technical input to Codex standards development – which can include provision of data, but is by no means limited to this. It is the intention of FAO/WHO in CTF2 to address some of these needs and continue the trend of improving countries' (delegates') knowledge of the scientific and risk assessment processes at the heart of Codex standards development, and how to engage in scientific and technical discussions. It is envisaged that countries or groups of countries will seek support on scientific and technical capacity integrated in project applications. A key element of assessing the suitability for funding by CTF2 will be based on a clear understanding of needs, and demonstration that the project would indeed address those needs effectively. In line with good capacity development practice this is a case-by-case assessment, however, FAO/WHO may decide there is a need for further analysis at some point in the future.

With regard to the second part of the recommendation to “develop a clear range of project activities that can be supported by an initiative such as CTF”, in the context of CTF2 a decision was taken by FAO/WHO to put the emphasis on increasing knowledge of science and risk assessment in standard-setting, and ensuring that countries and delegates are skilled in understanding the scientific advice provided by FAO/WHO and bringing scientific knowledge and data to the negotiation process. Any data collection activities supported will be part of a comprehensive and integrated process emanating from the national level through a country or group application, and will be tied to a specific data gap for standard-setting work in Codex.

Recommendation 7: Better align staffing to project scope

FAO/WHO agree with this recommendation. In the last year of implementation of the current Codex Trust Fund no change to staffing is envisaged. With regard to the successor initiative, it will be important to reinforce FAO and WHO technical contribution and support required to implement the tailored approach that has been outlined for the successor initiative, as well as a reinforcement of the Codex Trust Fund Secretariat doing the core work. This has been planned for in the development of CTF2 and staffing needs will be revisited as needed throughout the timespan of CTF2 to ensure that staffing continues to align with project scope.

Recommendation 8: Develop strategies and plans to increase predictability of funding

FAO/WHO agree with the analysis put forward in the final evaluation that a shift to addressing the underlying institutional barriers to effective participation in Codex at national level will require longer-term, more predictable funding than has been available to date. While the current Codex Trust Fund did make some progress in this regard as recognized by the evaluation team, even this progress is subject to reversal as witnessed by the multi-year donor agreements that were secured for the CTF1 but have not been renewed. The reasons for this are varied (and may include changing donor priorities, no contributions being made outside the framework of core voluntary and un-earmarked contributions to one of the parent organizations, overall reduction in funding available etc.) and are the subject of bilateral discussions with each donor.

Until now, the Codex Trust Fund has been able to run exclusively on voluntary contributions that are received outside the framework of corporate voluntary contributions made by bilateral donors, foundations and others to the parent organizations of FAO and WHO (i.e. no funding for the Codex Trust Fund has ever been received from FAO or WHO from either the regular budget (assessed contributions) or from un-earmarked voluntary contributions made to the two organizations). However, within WHO, many donors are following the policy lead of WHO which calls on donors to provide un-earmarked voluntary contributions to the organization and this will make it increasingly difficult to seek and receive additional contributions outside this framework, with the exception of the donors other than the core WHO constituency (i.e. ministries of health). Efforts have been made over the past years to widen the donor base and these efforts are continuing but it is unlikely that new sources of funding can cover the gap left by major donors in the past.

Compared to CTF1, which had a built-in mechanism to adjust each year's disbursement level to the level of actual funding available, CTF2 will have much less flexibility in that a beneficiary country receiving support during the last years of CTF2's lifespan would be expecting the same level of support in budgetary terms as a beneficiary country receiving support soon after the launch of CTF2. This means CTF2 requires a higher level of predictability in funding to carry out operations in a manner suitable to all beneficiaries.

Recommendation 9: Continue development of Monitoring and Evaluation frameworks

FAO/WHO agree with this recommendation. The current Codex Trust Fund invested considerable effort in the development of a monitoring and evaluation framework to assist in the monitoring and management of the project. Many lessons have been learned from the use of this M&E framework that have been taken into consideration and lead to modifications in both the project and how the project is managed over the past 4 years.

These experiences and lessons were also taken into consideration in the development of the results framework that appears in the project proposal for the successor initiative (CX/CAC 15/38/18-Add.5). While the final project evaluation highlighted that the development goal in the CTF1 results framework was set too high in the logical tree (i.e. not within the scope of CTF1 and a reasonable sphere of influence) FAO/WHO have decided to keep development goals within the results framework of CTF2 to indicate how CTF2 is situated within a development context and to show the development vision towards which the successor initiative is reaching. However, it is recognized that the CTF2 alone cannot be expected to have a measurable impact as such on these development goals, and it is for this reason that the project proposal states clearly that the contribution of CTF2 to achieving the development goals will not be evaluated.

Based on the results framework for CTF2, a log-frame will be developed for the full project document, and an M&E framework will be drafted as part of the implementation documents for CTF2 with SMART objectives and targets established. It is envisaged that a draft of the M&E framework will be tabled for the consideration of Codex members at the 39th CAC in 2016. Baselines for the M&E framework will be established in 2016 using different sources of information; some of which are currently under discussion in FAO/WHO and with the Codex Secretariat. Sources may include: Codex Secretariat-led survey of functioning of CCPs, needs assessments undertaken by countries in preparation for their applications to CTF2; information-gathering in the context of the revitalization of FAO/WHO regional coordinating committees.).

Recommendation 10: Lessons learned and new best practices should be integrated more quickly and with more consistency

FAO/WHO agree partially with this recommendation and refer readers to the remarks already made under Recommendation 2 which also have relevance to the question on the rapidity with which lessons learned and best practices are integrated into the programme. It should also be noted that a number of pilot initiatives undertaken within the Codex process, and supported by the Codex Trust Fund (e.g. support to the mentoring initiative on the use of microbiological criteria), were the result of a specific set of circumstances within the Codex process that allowed an opportunity to be taken advantage of, and for CTF funding to be used to support this. A degree of flexibility needs to be maintained as these opportunities arise from time to time in a specific context in a Codex committee and FAO/WHO and the Codex Secretariat will continue to scan the Codex horizon to identify ways in which funding from the Codex Trust Fund can be strategically used to respond to specific needs in Codex.

As CTF2 will be adopting a more tailored approach to supporting effective engagement in Codex, it will be important for CTF2 to be very adaptable and flexible, while remaining objective, predictable and rules-based. This will include exploring innovative approaches, “learning by doing” and applying the positive results of this learning to the implementation of CTF2 in a timely manner. Substantive changes that require the consideration and approbation of the full Codex membership will continue to be taken to the CCEXEC and CAC as relevant and appropriate. Other changes that can result in effectiveness and/or efficiency gains for CTF or for beneficiary countries, and do not necessarily require endorsement by the full Codex membership, can be considered and decided upon by the FAO/WHO Consultative Group for the Trust Fund (CGTF). This way of working should allow for more adaptability and quicker implementation of lessons learned and promising best practices.

In considering the direction and changes for the CTF2, FAO and WHO will keep in mind the intent, scope of the CTF2, and how it complements any other ongoing work of FAO and WHO. There will remain multiple channels of support to countries in this field of Codex and food safety. FAO and WHO will maintain an open consultation process for decision-making with donors, Codex membership and beneficiary countries to inform any changes and direction and use of funds.