

To Sida, Att: Ola Möller, Embassy of Sweden, Section for Development Cooperation, One Pacific Place, 20th floor, 140 Sukhumvit Road, Bangkok, Thailand

Management response by KemI to key recommendations of the Mid-Term evaluation of the regional programme “Towards a non-toxic environment in South East Asia” (Final report 2011-12-22)

General comment

The evaluation team has during a relatively short time made an ambitious inquiry into this extensive and complex program. Obviously, it has not been possible for the MTE-team to conduct a complete and in-depth analysis of all programme components during the limited time available for each country visit. Within the Programme’s Steering Group there is a general feeling that parts of the report and recommendations have been affected by this and that the team’s understanding of issues at times has remained too superficial. Further, it is not always clear whether specific recommendations refer to the work on pesticides, industrial chemicals, or both. The MTE report also still includes inconsistencies between different layers of the report (executive summary, main body and annexes). Nevertheless, the study does contain a number of recommendations that can be useful to help improve the program, especially in the preparation of a new phase.

The program has some limited funds to follow up on this evaluation within this program period. KemI suggests that such follow up focuses on some key issues that partners and Sida agree upon.

This management response focuses on the key general assessment points made in the executive summary and the list of specific recommendations. The latter are divided into three groups: short term, short/long term and long term. Where recommendations are duplicated or similar, cross references are made.

Specific comments

Key general assessment points from the Executive Summary

1.1	The general assessment is that the programme has produced outputs and outcomes that to a high extent meet the expectations according to the revised Logical Framework Approach (LFA). The prognosis for the programme reaching the targets for outcomes and objectives within the programme period is good.	Agree
1.2	There is clear scope for more added value through closer cooperation between the programme partners and their partners in turn at all levels.	Agree, but need to emphasize the distinct different roles of partners and the political complexity of closer collaboration, which requires careful maneuvering. The project has made important progress in those areas that are within reach and will continue to develop such cooperation.
1.3	There have been some implementation problems; however, the programme partners have been able to address these on both the regional and the national level and also on the field level. These problems have mainly been related to the implementation of activities at the farmer field schools and on provincial/national level when it comes to collaboration between Governments and Civil Society Organizations (CSOs). Naturally, it takes time for such collaboration to evolve. However, the Programme has done some groundbreaking work in fostering closer collaboration between government and CSO implementers.	Agree. As mentioned above, Government-CSO relationships are complex and the project partners have made some groundbreaking progress. This also includes the successful forging of closer collaboration between Ministries of Agriculture and Education.
1.4	The programme partners have implemented adequate monitoring and evaluation systems at all levels. The reporting is reliable. The reporting processes are transparent	Agree. One of the reasons financial management is quite complicated in certain parts of the Programme relates to the cross-cutting objective of

	and there is adequate accountability mechanisms implemented. The financial management is quite complicated with detailed budgets and processes that are time consuming and could be simplified.	good governance and eliminating abuse.
1.5	<p>The technical options and training methods are up to date with today's development approaches.</p> <p>The programme and its design are relevant for addressing present and future priorities and needs.</p> <p>The established relationships with external institutions have been functional and beneficial for the programme.</p>	Agree. The Programme continues to evolve the technical options and training methods, its design and external relationships.

Specific Recommendations: Short term

1.1	It is recommended to ascertain systems for impact assessments where possible within existing budgets, as well as compatible reporting systems, to clearly assess results against which the strategic work towards a non-toxic environment can be continued within the governments	Partially agree, the program already host some systems for impact assessment and a reporting system. The present format was agreed with Sida. Upon request of Sida, future reporting can be more substantial and more closely aligned to the log frame.
1.2	It is recommended to further develop the Regional Chemical Management Forums aiming at making them an instrument where contentious political aspects concerning the use of pesticides can be discussed on the countries' own conditions	Partially agree, presently the program works with the APPPC network to share relevant experiences and support implementation of APPPC work plans. The regional Chemicals Management Forum can become another instrument. This will be considered in the general question of which permanent regional body(ies) can take on a permanent responsibility for

		these issues
1.3	It is recommended to continue promoting a more detailed system for training of farmers to ensure a system where farmers and other pesticide customers can make sure the pesticide substance they use contains as low toxicity as possible and still is effective. PRR should be more emphasized in training of farmers rather than IPM with more training dealing with “alternative methods instead of safe use of pesticides”.	The recommendation is not clear and seems to contradict itself. IPM is about alternative pest management methods instead of safe use of pesticides. The current FFS combine both IPM and proper selection and use of pesticides. The availability of low-toxicity products is partly a regulatory issue and partly a supply-chain/farmer demand issue. The project aims to tackle both.
1.4	It is recommended to continue to build capacity for enforcement of pesticide legislation through inspection in a manner that sets achievable targets	Agree. Such continuation is envisaged into the next phase.
1.5	It is recommended to facilitate possibilities for governments to constitute by-laws to the pesticide regulation that will get into force when the pesticide regulation that is now in the process towards a legal agreement and that will ensure possibilities to control illegal import of banned pesticides	Agree, the new or revised pesticides legislation will require governments to revise or draft new secondary legislation/recommendations. The programme continues to offer support in this area.
1.6	It is recommended to initiate discussions on an organisational structure/solution that might serve as the foundation for the programme during a later phase. Such discussions should be more formalized during the phase beyond 2013	Agree, the issue will be on the agenda for the steering group and at the forthcoming Regional Chemicals Management Forum in Vietnam.

1.7	Instruments to measure cost-effectiveness should be introduced	Partially agree, this has to be discussed with Sida to define what type of measures this could be. It also has to be considered in the light of already existing methods and impact assessments and additional costs involved.
1.8	The impact assessments carried out should also look at the programme's impact on reducing costs related to health, environment, etc., rather than only economic return on production, in order to confirm cost-effectiveness of the programme.	Partially agree. This is already being done extensively for pesticides. Environmental Impact Quotient of changes in pesticide use is an element of most of the impact studies conducted under this programme. The same applies to participatory monitoring of health effects at farmer and community level. Consolidation or expansion of this work and its budgetary implications has to be discussed in the steering group and also with Sida (see 1.7). The Steering Group will also look into making better use of existing data in this respect.
1.9	At the national level coordination and cooperation between Governments, CSOs, research communities, universities and private sector need to be strengthened when it comes to pesticide policy's formulation and implementation, and institutional networking	Partially agree, just like 1.7 and 1.8 this is something that the implementing partners would like to see, but is often complicated in practice. The programme has and will continue to encourage and when appropriate facilitate this type of coordination/cooperation.
1.10	In some cases, the priorities of the government and the priorities of the farmers are not identical. The Programme design and implementation needs to be reviewed in order to address the gap between the government and farmers' priorities in the context of Programme implementation.	Partially agree, this is often the case and the program has and will continue to facilitate contacts and cooperation between the government and farmers in a manner that is guided by the programme objectives.

Short/Long term

<p>2.1</p>	<p>Due to a complex programme structure the evaluation of the programme concerning economic benefits are complicated. Therefore, there is a need for more assessments of impacts on reducing costs related to health, environment, etc., rather than only economic return on production, in order to confirm cost-effectiveness of the programme.</p>	<p>See 1.7 and 1.8</p>
<p>2.2</p>	<p>The programme needs to begin looking seriously into the issue of who will continue to host and support inter-country coordination and networking activities. This could be one of the regional institutions mentioned in the report or another solution, such as a rotating steering committee, the attachment of this activity to some other ongoing related initiative in the sub-region. While some interaction exists, e.g., on regional exchange through the APPPC, a full-scale host institution for coordination of future PRR and chemicals management activities has not been agreed upon. Once this is decided, work should begin right away on transferring regional coordination activities to the selected institution/system.</p>	<p>Partially agree. Distinction needs to be made between the work on pesticide management and the work on industrial chemicals. There is definitely a need to start the process of identifying a regional platform to take responsibility for chemical safety issues related to industrial chemicals.. We need to discuss the role and number of tasks for such an institution(s).</p> <p>Regarding pesticide risk reduction, it needs to be noted that the current partners were already collaborating with each other before the project started and there is little doubt they will continue to collaborate after the project ends. The network is the platform, which is further reinforced by the development of close collaboration with the APPPC Secretariat. The project has enabled a further development of such collaboration among partners.</p> <p>Further it should be noted that FAO has a primary international mandate on pesticide management and cannot transfer coordination of its work to a third party institution as suggested in the recommendation. APPPC is different because its Secretariat is provided by FAO.</p>

2.3	<p>Apart from IPM long-season training, it is recommended that the programme should review and adapt new training methodologies with short term trainings with more emphasize on pesticide risk reduction and identifying target groups of training in addition of farmers including local leaders and distributors of pesticides</p>	<p>See 1.3 Current work on enforcement of pesticide legislation already includes training of pesticide distributors. There also already is a range of innovative initiatives on raising awareness of community leaders and the development of community action plans. Various shorter-duration training models are developed in various countries to focus on promotion of -and skills development for- pesticide risk reduction among various stakeholders in rural communities.</p>
2.4	<p>It is recommended that the programme should take an active interest in ensuring that the different partners involved in the four components of the programme work as much as possible in close coordination with each other, to avoid duplication and encourage synergies.</p>	<p>Partially agree, this is already done but cooperation and coordination can be further enhanced. See also (new 1.2 and 1.3)</p>
2.5	<p>The programme should seek to get involved more widely in each country (and regionally) with the most important entities which could contribute to this work, in particular ministries and other government entities with an interest in the programme objectives and outcomes. This involvement has the potential to smooth the path for programme adoption by government, and to develop supportive synergies with a wider range of partners.</p>	<p>Partially agree, just like in 1.7, 1.8 and 1.9 its tempting to get more stakeholders involved. Chemicals safety is per se a cross cutting issue and more stakeholders should be involved. The program started with key ministries, CSOs and other relevant institutions and inclusion of additional stakeholders (e.g. health, environment and customs) should be carefully considered.</p> <p>It should be noted that main impediments to closer collaboration among stakeholders are often within the Governments and between Governments and CSOs, not within the Programme. The Programme continues to facilitate such broadening whenever possible.</p>
2.6	<p>The programme stakeholders, and especially the implementing personnel, need to take the concept of “Exit Strategy” as a permanent action, not a circumscribed exercise for the end of the programme. The programme</p>	<p>Partially agree, We agree that everyone should bear in mind how new methods, systems, institutions and legislation can be used and implemented on a permanent bases without the external support of the program. Partners have in their mind that the work should be handed over</p>

	<p>must already be strongly focused on the 'exit strategy:' i.e., moving everything more and more fully in governments' and civil societies' hands (respectively as appropriate).</p>	<p>to the local partners but we need to put the ideas on paper and set up targets. It will be part of developing the application for the next phase.</p>
--	---	--

Long Term

3.1	<p>It is recommended to ensure that the countries recognize full ownership over the programme and are fully committed towards its full implementation</p>	<p>Agree, but it is also recognized that this is sometimes more complex than it may seem.</p>
3.2	<p>It is recommended to initiate negotiations concerning an organizational structure for the programme; a structure based at regional level and where the Regional Chemical Management Forums might be a foundation for cooperation, towards which the programme partners would contribute</p>	<p>Agree, see also 2.2.</p>
3.3	<p>It is recommended that the programme in cooperation with APPPC should promote regional harmonization on policy, pesticide/chemical laws and regulations and harmonization of pesticide registration</p>	<p>This is already being done for pesticides, through APPPC. For the past years, specific support for this purpose came mainly from another FAO project that has now ended. The Programme has offered APPPC to enable continuation of its work on harmonization. It should be noted however, that under the current budget funding possibilities for such activities are very limited. APPPC is not the right entity for work on laws that encompass industrial chemicals.</p>

3.4	As point of departure the programme should take the already established visions for the participating countries for example the Institutional Vision for MARD 2020 in Vietnam	Agree, where countries have strategies or visions in the area of the program these should be emphasized in the project design. If a vision is weak (e.g. on industrial chemicals) the goal can be to help revise the vision. Kemi strongly believes the project is taking the right approach by facilitating internal discussion among ministries on chemicals management to help identify priorities and relevant and feasible targets.
3.5	Regarding enforcement of pesticide legislation, assistance should be provided to make it more feasible for those regulated to meet the legal requirements. For instance, in order to require that all pesticide labels are in the local language, one may need to focus on the supply chain. At the national level it should be considered to include explore and develop a stick and carrot approach to enhance adherence component on addressing the problems related to of pesticide companies to regulatory requirements	Agree, this will be a key focus area for the pesticide policy work during the next phase.
3.6	The ultimate goal of the programme should be based on the principle of full ownership for the regional and national partners to sustain the achievements with adequate own human and financial resources	Agree. It should be acknowledged, however, that national CSOs generally do not get funding from Government and remain dependent on donor funding. Likewise, the priorities and programmes of government departments in some of the project countries remain heavily dependent on donor funding. The Programme will continue to enhance sustainability against this background.

3.7	A clear exit strategy should be built in the programme	Agree, partners will consider this when developing the new program phase.
3.8	On the regional level it should be considered to include a component to monitor and influence the pesticide companies/industry to implement international standards on industry responsibilities including the full implementation of the FAO International Code of Conduct on the Distribution and Use of Pesticides, and the recently adopted UN Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework.”	Partially agree, In theory this should be a natural effect of good enforcement. In practice implementation by industry is still weak. The program can consider adding components directed to industry or to include industry representatives in some activities. Engagement of pesticide companies at the international level already is a major focus of work of both PAN and FAO. The Steering Group will consider to what extent engagement can be stepped up within the framework of this Programme. Possibilities are also being explored to more actively engage the pesticide industry at national level.
3.9	On the regional level it should be considered to include a component on how to address the distribution of illegal pesticides	Partially agree, many of the existing components and activities are already addressing the problem of illegal pesticides. Still, it could be considered to have additional activities that specifically focused on illegal trade, for example through a regional notification scheme for substandard pesticides. This is one of the activities the programme has proposed to support within APPPC context.
3.10	It should be considered to include a component on policies and strategies for disposal of pesticides and the disposal process.	Partially agree, Important work has been initiated regarding disposal of empty containers at farm and commune level, which can be further developed and mainstreamed. Disposal of stocks of obsolete pesticides would fall outside the scope of this Programme as it would require extensive funding at a level that is not available under this project. The project coordinates with a GEF funded pesticide disposal programme in Vietnam.

3.11	Dependent on the situation in the country it should be considered to invite representatives of relevant organizations in Myanmar to relevant regional activities, and consequently to include Myanmar in the field activities if appropriate partners can be identified.	Agree, but it would require additional funding.
------	--	---