



Kemikalieinspektionen
Swedish Chemicals Agency

Internationella enheten
Ule Johansson och Jenny Rönngren
Program Managers
International Unit
The Swedish Chemicals Agency

2016-11-30

Diarienummer
KemI:
242-H13-01013

Sida
Att: Louise Herrmann
11th floor,
Units 1103-1104,
One Pacific Place,
140 Sukhumvit Road,
Bangkok 10110,
Thailand.

Sida:
UF2012-69316
Beslutsnr:
2013-001799
Insatsnummer:
51020133

Management Response to the Mid-Term review 2016

During August to October 2016 the regional program "Towards a Non-Toxic Southeast Asia" was reviewed by a team from the consultancy firm NIRAS. The final report was submitted to KemI and partners the 27th of October. The report has now been scrutinized by all the partners and comments provided. Included below is a table with our response. The report will also be used when the partners discuss the future of the program during 2017.

Best regards

Ule Johansson
Program manager

Swedish Chemicals Agency

Mailing address
Box 2
SE-172 13
Sundbyberg
Sweden

Visit & delivery
Esplanaden 3A
SE-172 67
Sundbyberg Sweden

Invoicing address
FE 124
SE-838 80
Frösön Sweden

Phone & fax
Phone +46 8 519 41
100
Fax +46 8 735 76 98

Internet
www.kemi.se
kemi@kemi.se

VAT No
SE202100388001

Comments to conclusions (section 5.1)

Conclusions by MTR team	Comments from programme partners
5.1.1 Results, Theory of change, LFA and monitoring	
The conclusion is that the Programme has produced more and better outputs compared to the targets set in the results framework in the Programme document.	All partners agree.
The budget cuts that were feared from changes in exchange rates and lower budget for Swedish development aid did not materialise.	All partners agree.
The present LFA and monitoring system have deficiencies in that there is not an underlying agreed theory of change. The monitoring and reporting are biased towards activity and output reporting rather than towards outcomes and impact.	<p>Partners partially agree. An analysis of change was made and provided in the Phase II project document and reporting is based on the LFA in order to quantify outcomes to support our analysis.</p> <p>Partners agree that it would be good to discuss and formulate a clear and agreed theory of change and to put more emphasis on reporting of outcomes and impact. This should be part of the development of a future project proposal.</p>
A change in the results framework is warranted. The Sida helpdesk has provided a number of suggestions to improve the results framework, and in this MTR ideas about a new theory of change and a more outcome oriented results framework are also offered.	<p>All partners agree. No big changes will be made during the present programme phase.</p> <p>Review of the results framework will be an important part of the development of a future project proposal.</p>
However, the MTR Team considers it unwise to make a major overhaul of the present joint LFA for the Programme at this time. The reason is that the remaining time for the present Programme phase is only about 1.5 years. In its assessment of the proposal for the present phase, Sida already indicated that it is likely that there will be a continuation of the programme. Sida generally requires about six months for its decision process. This leaves only	All partners agree.

Conclusions by MTR team	Comments from programme partners
<p>a year for preparation of a new proposal, if there is to be no gap in the Programme.</p>	
<p>Therefore, instead of reworking the present LFA, and including new and emerging issues, the conclusion is that it would be better that the Programme and specifically KemI focus on a thorough preparation of a new proposal. This proposal could include the changes recommended in this MTR report, and ideas from the helpdesk report.</p>	<p>All partners agree.</p>
<p>5.1.2 Awareness and capacity building on IPM and PRR</p>	
<p>The economic situation for farmers has on average not changed much by replacing pesticides with manual labour and biological agents. It is important to stress that replacing pesticides does not necessarily mean more use of labour. Labour is quickly moving out of contemporary agriculture and there is therefore a need to work on labour-saving alternatives. Partner activity in all countries addresses the economic issue to a limited extent, but they recognise its importance. More could be designed into country strategies in a future Programme to help farmers increase their income by linking them to markets for safe food.</p>	<p>Partners partially agree.</p> <p>FAO: There is in fact, within context of the IPM supported work, good field-based evidence that project supported capacity building interventions have resulted into cost-savings and higher net return for farmers. Some case studies are available –and in fact shared with the MTR team-but agreed that more visibility through case study development could be a useful endeavour during the remaining years of this Programme phase.</p> <p>TFA: Linking to markets has been done in Vietnam but more could be done.</p> <p>PAN AP: Various studies and cases have documented increase in income among organic farmers. Perspective of long-term sustainability should include first and foremost food security, well-being and not just linking farmers to markets (see documentation: “Replacing Chemicals with Biology. Replacing Highly Hazardous Pesticides with Agroecology</p>

Conclusions by MTR team	Comments from programme partners
	http://www.panap.net/sites/default/files/Phasing-Out-HHPs-with-Agroecology.pdf)
5.1.3 Regulatory framework and chemical management institutions	
<p>The Programme's work with agriculture chemical management legislation, regulatory frameworks and inspection systems has moderately been successful. The fact that large-scale farmers who use significant quantities of pesticides, are becoming a larger component of the agricultural sector in countries in the region, warrants that the Programme focus more attention to the use of pesticides by this group.</p>	<p>Partners partially agree. This is something that could be explored and possibly included in a future project. Not easy to implement with governments having limited access to and control over private sector operations, often negotiated without transparency and influence from the public.</p> <p>It is still relevant to engage with small-scale farmers to create sustainable communities and contribute to poverty reduction and improved livelihoods of farmers.</p>
<p>More support is needed to continue the process of institution building for a spectrum of government institutions having responsibilities pertaining to the management of non-agricultural chemicals, such as implementation of regulations, registration, border inspection and import control, worker safety, food safety control, waste and data management. Also the government services for IPM need further support.</p>	<p>All partners agree.</p>
<p>A major conclusion from this MTR is that there is no coherent country and institution building focus in the Programme, for example in the form of country-specific strategic and annual plans for institution building in the CLM countries, including measures for communication to and engagement with policymakers.</p>	<p>Partners partially agree. The FAO work support institution building at various levels, including at national and local community levels, and engages at regular intervals with senior policy makers, as part of direct project supported interventions through workshops, conferences, farmer field days and/or through regular contact between the FAO Representative and respective Ministers and Department Directors in each and every FAO member state.</p>

Conclusions by MTR team	Comments from programme partners
	Partners agree that the collaboration between all local partners within a country could be improved. The 2017 annual workplan will mentioned concrete action to facilitate this process.
5.1.4 Efficiency	
Better coordination and joint planning of country activities could probably further improve gains in cost efficiency.	All partners agree.
The general impression from interviewing a number of involved people in the regional workshop is that the partner organisations make efforts to save costs for the Programme budget to allow for the implementation of all envisaged programme activities, and more.	All partners agree.
5.1.5 Relevance, flexibility and project design, risks	
The Programme is deemed by the MTR to be relevant both in relation to the needs and priorities in the region and the participating countries and from the donor perspective.	All partners agree.
The design allows for important work in relevant areas, and the Programme has shown flexibility in adapting to changed circumstances and gives continued attention to risk management. But the present design, with four independent partners with specific agendas and fixed budgets, has not been wholly suitable for coordination at the national and local levels.	All partners agree. Better coordination among partners at national level is required for better synergies of partner interventions. Regional partners can/should also be more pro-active in facilitating this process of better national coordination and joint planning. This responsibility should be assigned to one or more partners.
The major focus of the Programme has been on pesticide risk reduction in smallholder agriculture and on agro-ecology. There are still many important pesticide problems to solve in this domain in the region.	All partners agree. And not surprising given substantial private sector investments and action in marketing pesticides among smallholder.
The issue of pesticide use by large-scale farmers is not specifically addressed by the Programme, even though they are in theory subject to the same regulatory control. In practice they may have certain immunities not available to smaller players. And the development of new areas such as private sector	Partners partially agree. See related comment above (5.1.3).

Conclusions by MTR team	Comments from programme partners
<p>collaboration, consumer and industrial chemicals and other emerging issues, even though envisaged by the Programme, have not received the attention they require to make significant advances in reducing the level of toxic chemical exposure.</p>	<p>All partners agree that consumer and industrial chemicals should receive more attention in the future.</p>
<p>5.1.6 Relations with external institutions and regional collaboration</p>	
<p>The Programme has made contacts with other major programmes managed by ADB, OXFAM, IFAD and UNEP. There has been close collaboration with IFAD projects on IPM and some with other donor-financed projects.</p>	<p>All partners agree. WB, UNDP could be added to the list.</p>
<p>ASEAN has a working group on chemicals and wastes and KemI has good contacts with this group, which can be the basis for substantial collaboration in the possible new phase.</p>	<p>All partners agree.</p>
<p>The Asia and Pacific Plant Protection Commission (APPPC) has its secretariat in Bangkok provided by FAO, and there has been some concrete collaboration with KemI and the Programme on legislative and regulatory issues. Such cooperation is expected to continue.</p>	<p>All partners agree. Not just on the pesticide regulatory aspects but also in support of IPM capacity building as part of the planning, implementation and reporting of the bi-annual workplans of the APPPC-Standing Committee on IPM.</p>
<p>The regional collaboration within the Programme has been appreciated by the participants in the six countries. There are large Regional Forums every year, and workshops and partner meetings in-between. Topics have varied according to needs and circumstances in a flexible way. This regional collaboration is mostly at the level of information sharing. There have been a few instances of direct bilateral activities as a result, but more would be useful as part of a strategic plan in a new phase of the Programme.</p>	<p>All partners agree.</p>
<p>5.1.7 Sustainability</p>	
<p>The progress reports and interviews indicate that communities and farmers are supported in gaining awareness of pesticide related issues and to change their use of pesticides, and that many do it. These may be lasting changes, given the understanding that farmers have gained concerning health issues, even if the economic benefits are not there, but there was no data available to the evaluation team to prove this.</p>	<p>Partners partially agree.</p> <p>FAO: The FAO 2013/2016 impact assessment reports contain some evidence on the positive impact on applicators health following adherence to good practices for pesticide risk reduction, including a</p>

Conclusions by MTR team	Comments from programme partners
	<p>substantial shift to use of less toxic pesticides following participation in IPM and pesticide risk reduction training and regulatory action to ban WHO-Class I products.</p> <p>PAN AP: Case studies were shared with the MTR. More specific documentation is needed.</p> <p>TFA: Always show example of data where farmers had changed their pesticides handling behaviours such as mixing, spraying, storage and disposal including the reduction of pesticides uses.</p>
Savings groups and local government funds are used to further sustainability as observed in the MTR country studies.	All partners agree.
Curricula in schools are changed to include PRR.	All partners agree.
More work could be done on value chains, linking farmers to better paying markets, to give profit incentives to farmers to produce safe foods.	All partners agree.
Funding for IPM-type programmes have been forthcoming from provincial and central governments, most in China, Thailand, Vietnam and for IPM in Cambodia.	All partners agree. Some good progress made also in Lao PDR as per investment data in MTR report.
Private companies are a hitherto relatively untapped source of funding.	Partners partially agree. There are of course potential conflicts of interests to be considered before engaging with private sector on joint ventures. Private companies may have vested interests.
NGOs need continued fundraising for their work.	All partners agree.
At the national level, the Programme support to new laws, regulation and control has contributed to sustainable results.	All partners agree.
The regional collaboration in the Programme has given synergy effects. Sustainable continuation of regional exchanges after the Programme funding ends is uncertain.	Partners partially agree. Regional bodies, like APPPC, can take over part of the regional exchange functions now supported by the Programme.

Conclusions by MTR team	Comments from programme partners
5.1.8 Communication of results	
The communication of the good results of the Programme are very important as a means for influencing policymakers and the general public on the need for action against hazardous chemicals.	All partners agree.
The lack of coordination at country level in the Programme impedes the flow of information to policymakers. The websites of the four partners do not provide enough evidence from the Programme, and the monitoring and data collection is not geared to give substantial validated experience to be used to influence policymakers.	All partners agree. Better communication strategies and implementation thereof could potentially address this shortcoming. Work to provide monitoring data through PAN AP's CPAM app is on-going and could support this need.
The partners plan to increase the information of Programme results available on their websites, but generally policy makers do not make decisions based on such material. Well-developed and targeted policy briefs are required.	All partners agree. PAN AP and FAO have produced policy briefs but this area needs to be further strengthened.
5.1.9 Cross-cutting issues	
There are few indicators related to human rights but increased attention is being paid by the partners in their work and reporting.	All partners agree.
Gender equality is the cross-cutting issue that was most developed in the original Programme document, and this has been further developed. The Programme has complemented the original LFA indicators on a number of points, such as including more gender-disaggregated indicators, number of women-led activities, and reduced pesticide risks for women.	All partners agree.
The poverty perspective is implicit in the whole programme but not an explicit objective. The health effects can be induced by the indicator "Decreased use by farmers of hazardous pesticides". The information in reports on farmer incomes (less costs for pesticides, more manual work) is not conclusive and not gender-disaggregated.	Partners partially agree. See comment above (5.1.2).
The Programme has awareness about the danger of corruption and the different ways to prevent corruption such as regular financial reporting, audits, regulatory frameworks, inspections and a participatory approach. It is difficult to report on results of anti-corruption activities but some more reporting could be expected. A clear analysis is lacking of what are the	Partners partially agree. Partners have a good understanding of what corruption is, how it manifests itself, what best practice risk mitigation strategies are and these are widely promoted within the context of

Conclusions by MTR team	Comments from programme partners
corrupt activities, and by whom, which should be of direct concern to the Programme.	Programme supported interventions to the extent possible and within the scope of partner influence.
In conclusion, the work of the Programme on gender equality and human rights is progressing, while focused work related to poverty, corruption, environment and climate resilience is not being actively monitored.	Partners partially agree. Case studies are available – and made available to the MTR- that document impact on most of these cross-cutting issues. Much more can/should be done though to present evidence and communicate results to a wider audience.
5.1.10 Private sector	
Collaboration with the private sector is a way to increase better management of pesticides, often without using government or donor funds and with good sustainability. There are several cases of such collaboration in the Programme, but more could be done both in the agricultural sector and concerning production of industrial chemicals and their use in consumer products such as food, clothes and toys. At the same time, the large producers of hazardous pesticides are very much a disturbing factor that needs to be constrained by work on laws, regulations and control.	Partners partially agree. See relevant comments above (5.1.3 & 5.1.7). All partners agree that collaboration and dialogue with the private sector should be explored, when relevant and beneficial.
5.1.11 Risk management	
The risk matrix for the Programme with mitigation measures is updated every year and discussed at each follow up meeting with Sida. The MTR considers the risk management satisfactory.	All partners agree.

Comments to recommendations (section 5.2)

Recommendations by MTR team	Comments from programme partners
5.2.1 Focus on results management in new proposal	
It is recommended that the changes discussed in this MTR report concerning a theory of change, LFA, monitoring and reporting be included in the preparatory work on a proposal for a possible next phase of the Programme.	All partners agree.
For such a future phase, there should also be a new monitoring system. This should focus on fewer, clear, measurable and mainly outcome- related indicators. These should be measured every year and compared over time.	All partners agree.
For the next phase, increased cooperation should be established with academic resources in the region to support design and planning of monitoring and impact studies.	All partners agree. Existing and functional cooperation with academic resources is already quite evident in the FAO supported work, as illustrated, for example, in the impact assessment in Cambodia and Vietnam. A future project could however benefit from a more formalized and continuous cooperation with academia, e.g. in the area of laboratory analyses of pesticide residues and also in analysis of various monitoring data gathered by partners.
For the remaining period of the current phase, there could be more focus on reporting on outcomes and impacts and conveying these facts to policymakers.	All partners agree.
5.2.2 Programme design for country institution building in CLM countries	
It is recommended that the Programme focuses more on strategically planned work in the CLM countries (Cambodia, Laos, Myanmar), where the needs are greatest. The emphasis should be on building of sustainable institutions in these countries.	Partners partially agree. Future programme countries should be selected after careful consideration of needs/priorities etc. KemI plans to procure a study that should analyse the status of chemicals management in the region and identify the most acute problem areas connected to

Recommendations by MTR team	Comments from programme partners
	chemicals. This will be important input to the choice of future programme countries.
The regional collaboration within the Programme should continue with focus on the institutional capacity building in the CLM countries. The resources and knowledge in Vietnam, Thailand and China should continue to be tapped for the benefit of the CLM countries. Other countries could be invited ad hoc to meetings for specific purposes.	Partners partially agree. Additional countries could participate and make available technical advice and resources and be tapped for the benefit of the whole region (e.g. the case of Thailand).
In each CLM country the possible next phase of the Programme should make annually updated country plans for institution building in key institutions for chemical management. KemI does have technical knowledge and experience, but it does not have long experience of institution building in developing countries. To make the institution building happen, there is thus need for locally or regionally based expertise on these issues.	Partners partially agree. KemI has by now 10 years of relevant experience in supporting institutional capacity development in South-East Asia. Close linkages to regional expertise and presence in the region are however considered to be important for successful programme development, coordination and implementation.
An approach including additional areas of the chemical problems in the Programme countries should be looked into, of course based on national priorities. KemI has a very wide mandate and is well suited to handle a wider approach. There is a need to make choices in each country so as not to end up with unwieldy programmes without clear focus.	All partners agree.
The present Programme design is relatively static with the four partners and related NGOs. For a new Programme phase, possibilities to change the design of the programme to better respond to the need for more focused institution building in the CLM countries and a wider approach should be considered.	Partners partially agree. The broadening of implementation partners, particularly at national level, can be considered a useful suggestion as the Programme continues to evolve and for addressing relevant emerging issues/challenges and supporting selected interventions. However, the basis of this analysis is not entirely clear since the programme is doing well and the four partners are meeting the Programme objectives and targets.

Recommendations by MTR team	Comments from programme partners
<p>One option is to continue with KemI as the main manager of the Programme, strengthened by a development consultant firm with its team leader based in the region. The funds would be managed by KemI and there could be two parts: one budget going to FAO for agriculture chemicals issues and another budget for KemI's own work and support to NGOs, the NGO part being monitored by the development consultant on behalf of KemI. The consultant would also support the national focal points in the planning, coordination and reporting from the institution building in the three countries. The second part of the budget would also contain funds for regional support for the Regional Forums managed by Kemi with logistic support from the development consultant and for technical support from one country to another, also managed by the consultant.</p>	<p>Partners partially agree. Coordination/management of activities connected to pesticides can be improved but partners are not sure that the suggestion by the MTR team is the best way forward. This issue will be discussed in connection to the development of a future project proposal.</p>
<p>5.2.4 Sustainability</p>	
<p>The focus in the Programme should be on sustainability and institution building in the CLM countries, to have the governments taking responsibility for work towards the objectives of the Programme. The regional collaboration should have the same focus. There may be no funding available for Regional Forums after the Programme eventually ends altogether but they should continue during a possible new Programme period.</p>	<p>Partners partially agree. See comment above (5.2.2)</p>
<p>5.2.5 Communication of results</p>	
<p>The communication of results of the Programme should be improved in order to be used more effectively at country level and internationally. Communication strategies for the Programme (and for a next phase) should be made, and specific communication strategies for each CLM country for influencing policymakers should be produced as part of the recommended country strategies.</p>	<p>All partners agree, although not limited to the CLM countries.</p>
<p>5.2.6 Cross-cutting issues</p>	
<p>In view of a possible new phase of the programme, a Human Rights Based Approach linked to environment and climate change should be pursued, also to fit with the new Swedish strategy for development cooperation with Asia</p>	<p>All partners agree.</p>

Recommendations by MTR team	Comments from programme partners
and the Pacific. This should include a continuation of the on-going work to increase attention to gender equality.	
There has been increased awareness on health issues related to pesticides in the region and the Programme should continue to support that development. The issue of increased incomes for farmers is important not only from a poverty perspective but also to create better incentives for farmers to continue using less pesticides. The questions of value chains and markets for safe food could be given more attention in the Programme if given priority in the country strategies.	All partners agree.
In a new results framework for a possible new phase of the Programme, indicators on measurable effects on environment and climate change should be sought. More reporting should be undertaken related to anti-corruption measures.	All partners agree.
5.2.7 The private sector	
The successful collaboration with the private sector that already started, mainly in the agricultural production domain, should continue. So should institution building to increase controls on companies producing and selling hazardous pesticides. Large-scale agricultural producers are important pesticide users and should be given more attention.	Partners partially agree. See relevant comments above.