

**EX POST EVALUATION OF STDF PROJECT**

**Strategy to strengthen the SPS system in Comoros  
STDF/PG/242**

**EVALUATION REPORT**

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## Table of acronyms

|          |   |
|----------|---|
| AFD      | French Development Agency                                 |
| AFIDEV   | Export and Rural Development Sector Support Project       |
| AU       | African Union   |
| AU-NEPAD | African Union Development Agency                          |
| AU-IBAR  | African Union – Inter African Bureau for Animal Resources |
| EIF      | Enhanced Integrated Framework                             |
| CAC      | Codex Alimentarius Commission                             |
| CAADP    | Comprehensive African Agriculture Development Programme   |
| COMESA   | Common Market for Eastern and Southern Africa             |
| CPM      | Committee for Phytosanitary Measures                      |
| DTIS     | Diagnostic Trade Integration Study                        |
| EU       | European Union  |
| FAO      | Food and Agriculture Organization                         |
| FTA      | Free Trade Area   |
| GDP      | Gross Domestic Product                                    |
| IFAD     | International Fund for Agricultural Development           |
| IOC      | Indian Ocean Commission                                   |
| IPPC     | International Plant Protection Convention                 |
| ITC      | International Trade Center                                |
| JICA     | Japan International Cooperation Agency                    |
| LoA      | letters of agreement                                      |
| LDC      | Less-developed country                                    |
| MEL      | Monitoring Evaluation and Learning Framework              |
| MOA      | Ministry of Agriculture                                   |
| NAIP     | National Agriculture Investment Plan                      |
| NGO      | Non-Governmental Organization                             |
| NIU      | National Implementation Unit                              |
| OECD     | Organisation for Economic Co-operation and Development    |
| OECD/DAC | OECD Development Assistance Committee                     |
| OIE      | World Organisation for Animal Health                      |

|         |  |
|---------|--|
| PANSPSO | Participation of African Nations in Standard Setting Organizations |
| PCE     | Phytosanitary Capacity Evaluation                                  |
| PG      | Project Grant  |
| PIDC    | Integrated Project for Development of Comoros                      |
| PPG     | Project Preparation Grant  |
| PPR     | Peste des Petits Ruminants   |
| PREFER  | Family Farming Productivity and Resilience Support Project         |
| PRSP    | Poverty Reduction Strategy Document                                |
| REC     | Regional Economic Community  |
| SDG     | Sustainable Development Goal                                       |
| SPS     | Sanitary and Phytosanitary Standards                               |
| STDF    | Standards and Trade Development Facility                           |
| UN      | United Nations   |
| UNDP    | United Nations Development Programme                               |
| USD     | Dollar of the United States of America                             |
| SCA2D   | Accelerated Growth And Sustainable Development Strategy            |
| Vet-Gov | Strengthening Veterinary Governance in Africa                      |
| WHO     | World Health Organization  |
| WTO     | World Trade Organization   |
| WP      | Working Party  |

## I. EXECUTIVE SUMMARY

In March 2012, the Working Group of the Standards and Trade Development Facility (STDF) approved a project application entitled: "Strengthen the SPS system in Comoros" (STDF/PG/242). The project was a joint initiative from the Ministry in charge of Trade and the Ministry in charge of Agriculture, who wished to implement recommendations and directions from the Diagnostic Trade Integration Study (DTIS), and the Poverty Reduction Strategy Document (PRSP).

The project aimed to build SPS capacity in Comoros to increase its market access for potential agricultural products and fisheries, thus leading to economic growth and poverty reduction. The purpose of the project was to develop operational action plans in key sub-sectors: (i) food safety, (ii) plant protection, and (ii) fishery products. The United Nations Development Programme (UNDP) was contracted by WTO as the organization to implement the project. UNDP subsequently entered into agreements with associated international partners (UN agencies: FAO, WHO and ITC) to carry out activities related to their mandate and expertise.

The main objectives of this ex-post evaluation are to: (i) Verify whether the project achieved the objectives, outcomes and outputs (ii) assess the relevance, effectiveness, efficiency, impact and sustainability of the project, (iii) identify if the project contributed to higher level objectives of the STDF and the Sustainable Development Goals (SDGs), and (iv) identify key experiences, good practice and lessons of interest.

Due to the sanitary situation due to COVID-19, the evaluation had to take place entirely remotely. The main sources of information were the available documentation on the project and the SPS context, and interviews with stakeholders that were conducted by digital means. Despite the challenging conditions, most of the project stakeholders could be met and the needed data and information could be collated. Only final beneficiaries such as market vendors and agricultural producers could not be interviewed which mainly affects the assessment of impact of awareness activities, which is thus based on secondary information.

The main conclusions of the evaluation are as follows:

The **relevance** of the project is assessed as **satisfactory**: Initiating a project that sets the institutional basis of a modern SPS system was a genuine need of Comoros when the project was initiated; capacities and awareness on SPS matters were extremely low, SPS institutional mechanisms were almost inexistent, and the regulatory framework was yet to be developed.

The **effectiveness** is assessed as **satisfactory**. Almost all four project outputs were achieved, although some were with significant delay due to the complexity of the implementation setup. Unfortunately, the achievement of outputs did not translate entirely into a good achievement of outcome (*the national SPS system is able to support the country's agricultural export development strategies*) and goal (*contribution to improving farmers' incomes*). The main explanation for this is that the outcome was probably too much focusing on one aspect (facilitation of exports), which was subject to substantial risks, while aspects related to domestic sanitary safety, which were also fully relevant for the country, were not reflected in the logframe.

The **efficiency** of the project is rated **very satisfactory**: all planned activities were implemented except one (i.e. SPS information system) which was not fully relevant in the context of Comoros. Most of the activities, especially those implemented by FAO, were however implemented with delays, but these delays were mostly due to external factors on which the project had limited influence, and adequate adaptation measures were taken to address them. Other risks, most of them having been identified in the risk matrix, occurred, but this did not influence significantly the implementation of activities and the delivery of outputs. The cost effectiveness was not optimal, especially for trainings.

The **impact of** the project is rated as **satisfactory**. The project has not had a significant impact on trade and on domestic situation yet but has laid the necessary settings for this to happen when other conditions will be met. The impact on participation of Comoros in standard setting is assessed as marginal. The project has also benefited from the political momentum created by the WTO accession process and has in turn positively contributed to support the accession. On the other hand, the project had a significant impact on awareness of both officials and final beneficiaries. One of the major consequences of this better awareness was the mobilization of financing and technical support from other sources, to support SPS activities, which confers to the project a very good spill over effect.

The **sustainability** of the project is rated as **moderately satisfactory**. The main outcomes of the project (although called *outputs* in the project document): capacities, awareness, institutional framework, are relatively long lasting and will not immediately disappear after the project end. However, the sustainability of these outcomes is jeopardized by the partial adoption of regulatory texts developed, and the lack of core resources of Government institutions to finance implementation of SPS measures. The implementation setup and the delegation of implementation responsibilities to an international organization has not contributed to a full appropriation by national institutions, and this insufficient national ownership has in turn led to poor allocation of resources to SPS activities after the project end. This aspect has not sufficiently been anticipated in exit activities.

#### **Immediate way forward:**

This evaluation should be seen as an opportunity to complete some of the unfinished work related to sustainability and lessons learnt, that are preventing the project impact to be optimal. The outcome of this evaluation could be used by stakeholders to raise the awareness of the donor community and decision makers in charge of budget making, on the existence of a solid SPS institutional system, and on the need to finance its operations. Regarding the support to the adoption of remaining regulatory texts, which is a significant remaining gap, there is a need for close in-country follow up to ensure that the processes go through. The evaluator recommends that MOA leads this endeavour, with the support of relevant STDF partners (in particular FAO).

#### **General recommendations and lessons of interest for STDF:**

- The choice of the implementing agency for such national projects should be carefully considered by STDF in the future in light of capacities of institutions, but also of their mandate and their ability to sustain the project activities. The choice of entrusting implementation responsibilities to an International Organization was guided to the institutional context at the time of the design, in particular the capacities of public institutions on SPS matters. It has indubitably ensured a smooth implementation but has not allowed a full national ownership. Public institutions in countries supported by STDF may not have optimal implementation capacities but, considering that establishing strong institutional systems is an overall long-term goal, placing them in the driving seat should be an option to consider in the future.
- In countries where the institutional and economic contexts are volatile, the choice of project objectives should be considered with extreme care, and institutional risks should not be underestimated. Establishing a theory of change on one narrow outcome depending on one major assumption that has a high likelihood of not occurring, like the emergence of new export flows in this case, presents a high probability of leading to non-achievements of outcomes, at least "on paper". Having only one outcome for such a complex project also increases the risk of having no outcomes achieved if this outcome is highly subject to risk, which is the case here.
- The "catalytic effect" contemplated by STDF may require some actions that go beyond the scope of this project. Some of the institutional capacities and systems established with the support of STDF can be sustained only if they are further supported and financed. Insufficient public funding to SPS activities is a recurrent problem in developing countries, and there is a need to conduct continuous advocacy and lobbying to



improve this. This may require a follow up beyond the project closure, both by MAPE and implementing partners still active in the country in the SPS domain (e.g. FAO, OIE, AFD).

## **II. INTRODUCTION**

### **A. Project policy context and institutional environment**

The Union of Comoros is a small island nation with a strategic geographical position in the Mozambique Canal. The country is home to 800,000 people. About half of the population lives on Grande Comore. The population is predominantly young and continues to grow rapidly (2.9% per year). According to current projections, the population is expected to reach one million by 2028 and more than double by 2050.

Since July 2019, the Union of Comoros has joined the middle-income group, but remains ranked among the 51 low-income and food-deficit countries and as a fragile state by multilateral development institutions.

GDP per capita is US\$1,320 (2018). Over the past ten years (2009-2018), annual GDP growth has averaged 2.9%, but has fallen to 2.2% over the past four years.

The economy is not very diversified and relies on the agricultural sector, which generates 33.5% of GDP (2017), about 56.8% of employment and almost 90% of export earnings (ylang-ylang, cloves, vanilla). Diaspora cash transfers accounted for about 11.8% of GDP in 2018, almost four times the amount of official development assistance received by the country. The country is ranked 160th out of 190 countries for business climate. The country's trade balance is negative, with a deficit of USD 249 million in 2018, or 20.7% of GDP. The country's economic situation is closely linked to the international situation due to the heavy dependence on imports, particularly for food and hydrocarbons.

The agricultural sector plays a central role in the Comorian economy. It contributes significantly to the incomes of rural households and provides a significant share of the products consumed by the population, despite the importance of imported food products.

In March 2012, the Working Group of the Standards and Trade Development Facility (STDF) approved a project application entitled: "Strengthen the SPS system in Comoros" (STDF/PG/242). The project was a joint initiative from the Ministry of Trade and Ministry in charge of Agriculture, who wanted to implement recommendations and directions from two key strategic frameworks:

- The Diagnostic Trade Integration Study (DTIS), in its initial 2006 version, and its revised 2015 version), formulated in the scope of the Enhanced Integrated Framework (EIF): The DTIS laid the basis and provided the main institutional rationale for the project. In particular, the DTIS highlighted the fact that the SPS system was rudimentary, and the need to strengthen it to support trade efforts. The DTIS also provided the main strategic orientations of the project, including the need to assess SPS capacities, and the need to develop an SPS strategic and regulatory framework.
- Poverty Reduction Strategy Document (PRSP) - 2009: the PRSP was the overall strategic framework for economic development at the time of project start-up, for the period 2010-14. Although the need to reinforce the national SPS system was not explicitly mentioned in the PRSP, the document called to strengthen or support the emergence of export markets including niche markets at regional level, for fisheries and agricultural products.
- The PRSP was replaced by the Accelerated Growth and Sustainable Development Strategy (SCA2D) in 2015, and by the revised SCA2D in 2019. Both strategies have reiterated the priorities set by PRSP regarding the need to reinforce trade and economic integration, including through better compliance with standards.

Another strong institutional driver for the genesis of this project was the World Trade Organization (WTO) accession process, which was initiated in 2007 (and is still ongoing).

To facilitate the accession requirements, it was a key requirement for the country and for the Ministry of Trade in particular, to demonstrate that some efforts were devoted to establishing a proper SPS system, that would allow Comoros to comply with requirements of the SPS Agreement.

An additional important process that has involved Comoros in the recent years is the creation of the COMESA Free Trade Area (FTA). To be part of the FTA, the Country was required to align its trade regulations to the ones of the other REC members, including by progressively aligning its tariff barriers to the ones of COMESA, but SPS regulations as well.

As all African Union (AU) Member States, Comoros is committed to adhere to the Comprehensive African Agriculture Development Programme (CAADP) process<sup>1</sup>. Until recently, Comoros was one of the last African countries that had not signed the CAADP compact nor adopted a National Agriculture Investment Plan (NAIP), which is a key requirement to comply with the CAADP process. However, with the support of the World Bank and AU-NEPAD Agency, a draft NAIP was developed in 2019 and adopted in 2020. This NAIP is the first national strategic document that explicitly includes SPS investments. These SPS measures not only target trade and export, but also domestic sanitary security and public health.

At the time of the design, Comoros had not received any significant support in the SPS domain from its development partners. Most of the donors, and in particular the major ones (EU, France) had stopped supporting the agriculture sector because of implementation and governance issues that had affected the efficiency and impact of projects.

## **B. Project summary**

The project aimed to build SPS capacity in Comoros in a comprehensive and systematic manner, in order to increase its market access for potential agricultural products and fisheries, thus leading to economic growth and poverty reduction. Key outputs of the project were to develop and overall SPS strategy and operational action plans in key sub-sectors: (i) food safety, (ii) plant protection, and (ii) fishery products, and to build the necessary capacity and awareness to allow their implementation. This was expected to be done through a gradual step-by-step approach and a special focus was given to awareness raising and capacity building, especially during the early stages of the project, to create the environment and the "momentum" for the elaboration and implementation of the national SPS strategy. As such, it was foreseen that the project would act as a catalyst and the foundation for other planned projects in the country aiming to promote exports of agricultural products.

The project was formulated through the usual STDF process: an PPG (Project Preparation Grant) was submitted by the Ministry of Trade and approved by the STDF in June 2008, which resulted in a proposal (PG – Project Grant) submitted to the STDF and discussed by the WG in December 2009. The initial proposal was considered as too ambitious and lacking a strategic approach, by STDF, and had to be revised with the assistance of STDF staff. The consultations for the project formulation involved all relevant stakeholders, in particular the Ministries of Trade and Agriculture, as well as the private sector representatives. The United Nations Development Programme (UNDP) was contracted by WTO as the organization to implement the project. UNDP subsequently entered into agreements with other United Nations (UN) agencies (FAO, WHO and ITC) regarding their cooperation on project implementation<sup>2</sup>. The International Plant Protection Convention

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<sup>1</sup> CAADP is a Panafrican framework led by the African Union and supported by majority of donors. The objective of CAADP is to boost and coordinate investment to stimulate growth in the agricultural sector.

<sup>2</sup> Letters of agreement were signed between UNDP and WHO (November 2013), ITC (April 2014), and FAO (May 2014). These will be part of the documentation provided to the Consultant.

(IPPC) was also involved in the project implementation as the Phytosanitary Capacity Evaluation (PCE) tool was applied in the country in April 2017. Based on the contract (signed between WTO and UNDP in September 2012), the project was expected to run from September 2012 to September 2015. However, actual implementation only began in June 2013, due to delays related to institutional difficulties within the public administration and long negotiations to obtaining letters of agreement (LoA) between UNDP and other UN agencies involved (namely FAO and WHO). UNDP requested a 12-month no-cost extension in March 2015, with an additional 6-month extension requested in March 2016, in order to finalize certain activities such as the sectorial actions plans, the final national SPS strategy as well as the public awareness-raising campaign. A third extension was requested by UNDP in December 2016 and a final (fourth) extension was requested in December 2017 (until June 2018). The STDF approved all the extensions requested.

The outputs contemplated under the project were as follows:

- Sub sectoral institutional capacities and capacity building needs clearly identified: Under the project, detailed diagnostic studies were planned using tools developed by the relevant international organizations<sup>3</sup>. These studies most notably involved the assessment of: (i) phytosanitary capacities;<sup>4</sup> (ii) institutional arrangements regarding food safety; (iii) institutional arrangements for the fisheries sector; and (iv) laboratory analysis facilities. The studies were supposed to include specific capacity building recommendations, to be taken into account when establishing sub sectoral action plans.
- Operational action plans adopted, and priorities established with regard to ongoing agricultural export promotion programmes: In each of the sub sectors examined (plants, food, fisheries and laboratories), an operational action plan was to be prepared based on the results of the analyses carried out during the sub sectoral diagnostic studies. A precise inventory of ongoing or planned technical assistance programmes had to be drawn up for each of the sub sectors, so that the priorities established reflect complementarity and identify areas in which additional support was necessary.
- More favourable conditions for the development, adoption and implementation of national SPS strategies: Under this output, it was envisaged to train officials on the basic principles of a functional SPS system consistent with international standards to ensure the key skills required for the development and implementation of the national SPS strategy are acquired. Training sessions and awareness raising activities were planned for all categories of stakeholders (public and private), at every level (from grassroot operational levels through to the decision-making level).
- A national strategy for the implementation of SPS measures in Comoros adopted by the Government and consulted with all public and private stakeholders: Based on the capacity assessments and operational plans developed under other outputs, a national SPS strategy was to be developed and adopted. The purpose of this document was to serve as a reference framework for SPS investment and technical assistance, and as a master plan for the Government in respect of SPS decision making.

## **C. Objectives and scope of the evaluation**

### **1. Objectives**

The main objectives of this ex-post evaluation are, as per the ToRs and evaluation framework, to:

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<sup>3</sup> See note in STDF briefing note "SPS capacity evaluation tools in action" in: [https://www.standardsfacility.org/sites/default/files/STDF\\_Briefing\\_14.pdf](https://www.standardsfacility.org/sites/default/files/STDF_Briefing_14.pdf)

<sup>4</sup> The adoption of new legislation on plant protection, in line with IPPC standards, as well as on food safety, alongside the creation of an NPPO was achieved. See project progress reports as well as the STDF Annual Report 2017: [https://www.standardsfacility.org/sites/default/files/STDF\\_Annual\\_Report\\_2017.pdf](https://www.standardsfacility.org/sites/default/files/STDF_Annual_Report_2017.pdf)

- Verify whether the project achieved the objectives (outcomes and outputs) set out in the project document;
- Assess the relevance, effectiveness, efficiency, impact and sustainability<sup>5</sup> of the project approach and activities;
- Identify if the project contributed to any of the higher level objectives of the STDF (e.g. measurable impact on market access, improved domestic SPS situation, poverty reduction) identified in the logical framework attached to the STDF Medium Term Strategy for 2020-2024, including the linkage and contribution to the Sustainable Development Goals (SDGs), in particular SDG 1 (no poverty), 2(zero hunger), 3 (Good health), 8 (work and economic growth) and 17 (partnerships), and cross-cutting issues (gender, environment);
- Identify key experiences, good practice and lessons of interest to the beneficiaries of the evaluated project, as well as to STDF Working Group members and development partners more broadly (including for future STDF programme development).

## **2. Scope**

The scope of the evaluation entails the activities implemented by the project through the implementing agency and the project partners during the entire project cycle, including during the design and initial consultations (to evaluate relevance and ownership in particular), during implementation, but also completion and exit. Since the project was firstly aimed at being a catalyst for change, the evaluation also looked at activities and achievements by beneficiaries and implementing agency and partners outside the scope of the project, and after the project, to evaluate potential spill over effects and sustainability.

### **D. The evaluator**

The evaluation has been conducted by Alban Bellinguez, freelance consultant. Mr Bellinguez is an agronomist, specialized in agricultural and livestock development, and in SPS matters. Mr Bellinguez has around 35 years of professional experience, mostly in Africa and in the Indian Ocean.

Mr Bellinguez has regularly worked in Comoros since 2007, for various development agencies (AFD, IFAD, World Bank) and on different topics. This has been an asset for conducting this evaluation that entirely took place remotely, since the consultant was already familiar with the context, and already knew most of the project stakeholders. The consultant also had a knowledge of the pre-project situation, which facilitated the assessment of changes.

During part of the project implementation period (2009 -2107), Mr Bellinguez was involved in the implementation of a continental SPS project (PANSPSO), which was aiming at supporting the participation of African Union Member States in the standard setting processes. This project was implemented in close partnership with the OIE, the Codex Committee, the IPPC, the WTO SPS Committee and the STDF. This project had some collaborations with the present project, in particular regarding training of stakeholders on the standard setting process, and for the creation of a national SPS committee. However, the expert was entirely paid and facilitated by his institution (AU-IBAR) during these missions and did not receive any benefits from the STDF project. There was therefore no conflict of interest for the expert in undertaking this evaluation.

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<sup>5</sup> « Coherence », which is now an OECD evaluation criterion, was not part of the ToRs of this mission

### **III. EVALUATION METHODOLOGY AND PROCESS**

#### **A. Overall approach**

The evaluation approach and methodology has been guided by 3 main documents and frameworks:

- The terms of reference for the evaluation
- The guidelines for evaluation of STDF funded projects
- The STDF Monitoring Evaluation and Learning Framework - MEL (2020 version)

The analysis was based on the OECD/DAC evaluation criteria (relevance, effectiveness, efficiency, impact, sustainability) and lessons learned, with particular emphasis on impact, sustainability, and synergetic effects.

The detailed methodology has been presented in an evaluation framework validated by STDF before the evaluation started. The evaluation framework contained an evaluation Matrix with detailed evaluation questions pertaining to each evaluation criterium, detailed indicators and pre-identified sources of information and verification. This evaluation matrix is attached in Annex IV.

Based on the evaluation matrix, detailed guiding questions will have been developed for each category of stakeholders; they are presented in annex V.

#### **B. Evaluation steps**

The evaluation process has followed the below consecutive steps:

##### **1. Identification of available documentation and information source:**

The documentation provided by STDF, the implementing agency (UNDP), as well as the documents already at the disposal of the consultant were inventoried. The information gaps and missing documents were identified and sourced when possible, either from stakeholders or from the web.

The set of documents collated and consulted was comprehensive and included the project design document, implementation reports from all stakeholders, administrative documents (including LoAs), assessment reports and the draft regulations/strategies developed, as well as the relevant institutional frameworks. The only documents that were identified but could not be sourced are those that are classified as confidential (i.e. the IPPC PCE report, or the WTO accession working party minutes).

##### **2. Identification of stakeholders**

Based on a preliminary list provided by UNDP, the list stakeholders involved in project implementation (or indirectly concerned by the project but whose opinion could be relevant for the evaluation) has been established. The stakeholders were classified in 3 categories: (i) Implementing agency and associated international partners, (ii) National partners and beneficiaries (Public sector and Civil society and private sector), and (iii) Development partners. The detailed list of stakeholders including their role in implementation, type of benefits received and contact persons, is provided in Annex VI. This evaluation step was not subject to any specific challenge or difficulty.

##### **3. Desk study**

The documentation collected and inventoried was analyzed to extract the elements that would be relevant for the evaluation. Considering the amount of documentation, this step of the evaluation appeared more time consuming than initially envisaged but was not subject to any specific difficulty.

##### **4. Interviews with stakeholders**

It was initially envisaged that this evaluation step could take place both remotely and physically; A 3 to 4 days mission in the Country was initially envisaged to take place after a phase of initial remote interviews. However, because of the worsening of the sanitary situation in the Country in January 2021 due to Covid-19, the idea of a physical mission was abandoned. Therefore, all interviews had to be conducted remotely, using Zoom or WhatsApp.

Several difficulties made the implementation of this critical evaluation step particularly challenging:

- Some stakeholders never responded to the meeting request (sent by email) despite reminders.
- Several scheduled meetings could not take place, either because of connectivity issues, or because the contact person was not available in the end.
- Some officials, in particular those from the Ministry of Health, were monopolized by the sanitary situation, and could not make themselves available at all.
- It was not possible to organize focus groups meetings with final beneficiaries (farmers, market vendors) due to restrictions on public gatherings.

In the end, most of the stakeholders identified (in particular international partners, officials from Ministries of Trade and Agriculture, private sector representatives - see detailed list in annex VI), could be met, except officials from Ministry of Health, Directorate of Fisheries in the Ministry of Agriculture, and final beneficiaries of awareness raising activities. For those that took place things went as planned, and the objectives of the meetings were met.

Even if all the targeted stakeholders could not all be met through this way, all the required information could in the end be collected.

## **5. Preliminary analysis**

The substantial amount of information, data, opinions and evidence gathered during the desk study and interview phases was then collated and analyzed. The main tool used for this analysis was the evaluation matrix, with the specific questions for each criterion. This phase was not subject to any difficulty or challenge.

## **6. Validation of preliminary analysis**

A stakeholders' validation workshop has been organized on 31<sup>st</sup> March 2021 in order to discuss and possibly amend the preliminary findings of the evaluation. This workshop was organized in a hybrid manner combining both physical attendance for some key participants in Moroni, and virtual participations for others, both in Comoros and abroad. The attendance was mostly composed of representatives of national public institutions that have been engaged in project implementation, WTO representatives, and some international development partners (FAO, AFD). The private sector was unfortunately not represented.

Preliminary findings were presented in French in a power point format.

This meeting has allowed to confirm and validate most of the preliminary findings, clarify pending issues and fill information gaps.

In parallel, the draft analysis report has been to STDF for its review, and with the implementing agency, and the provided written comments have been incorporated in the present final report. The comments received from STDF were mostly pertaining to fact checking and dimensions to be deepened, and were in particular focused on the project design and inception phases.

## **7. Final analysis**

The present final analysis is based on the preliminary draft report revised in light of the complementary information gathered during the above phase.

## **8. Final validation**

The final validation of the draft report will take place as follows:

- The consolidated draft report will be submitted to STDF for a last row of written comments.
- Once these comments considered, it will be translated and submitted to UNDP, Ministry of Agriculture and Ministry of Trade.
- The consolidated analysis findings will be shared by STDF, including with the STDF-WG members, via the STDF website, as well as with implementing agency, key ministries (Agriculture, Trade and Planning) and other relevant stakeholders in Comoros, in order to focus attention on follow-up to the recommendations and promote learning.

## **9. Stakeholder consultation**

The main missing steps of this evaluation, due to the Covid-19 related restrictions on travels and public gatherings, and the subsequent impossibility to organize a field mission, were the field visits. Field visits would have allowed to meet final beneficiaries such as farmers, market vendors, and assess their level of awareness, the changes in practices that the project has induced. This could not be done through virtual means and this part of the assessment had to be based on the opinion of stakeholders' organization leaders only, which may be partial and biased, and may not represent the genuine point of view of grassroots level members.

The absence of field visit was however partially compensated by the fact that the consultant has been involved in several field missions during the last decade and has some knowledge on the situation of final beneficiaries, especially farmers.

## **IV. FINDINGS AND ANALYSIS**

The purpose of the evaluation was to evaluate relevance, effectiveness, efficiency, impact, sustainability and lessons learnt. These are the standard OECD evaluation criteria, and it was critical to structure the evaluation around these five criteria, firstly for STDF to ensure accountability to donors, but also to support learning and sharing of evaluation results. In addition to OECD criteria, specific evaluation questions were proposed to assess crosscutting issues (Gender and Environment), and contribution to STDF outcomes and SDGs.

For each evaluation criteria, evaluation questions were developed based on the standard questions extracted based on the guidelines for evaluation of STDF funded projects and MEL framework, with some additional questions to address the specificities of the context and project. The answers to the evaluation questions are presented and analysed below, together with a reference to the evidence and source of information.

### **A. Relevance**

#### **1. Overall judgement on relevance**

The relevance of the project is assessed as **satisfactory**: the project design addressed institutional problems and needs that were high in the agenda of the Country at the time of design (willingness to develop export markets, WTO accession), and which were reflected in the main strategic frameworks.

The answers to the three evaluation questions pertaining to relevance are provided below:

## **2. Relevance of the project initial design to the SPS related needs of the beneficiary**

### **(i) Relevance to the SPS situation at the time of the design**

At the time of design, as mentioned in the project proposal, Comoros had a very “rudimentary” SPS setup:

- There was no strategy and regulatory framework for the SPS sector;
- Awareness and capacities on SPS issues of all categories of stakeholders were very limited;
- Public and private investment on SPS related infrastructure and equipment (laboratories, quarantines and inspection facilities) was almost inexistent, and the only SPS infrastructure existing at this time were poorly equipped laboratories (plant health and animal health) at INRAPE.

On the other hand, the impact of sanitary risks was important:

- Due to lack of inspection and control on imports, impact of imported diseases on plant health, animal health, and even public health was commensurate: like many islands, Comoros initially had a very favourable sanitary status, both for plant and animal health, but with the boom of imports, especially those from the African Continent, several animal diseases (theileriosis, Peste des Petits Ruminants, Foot and Mouth Disease, Rift Valley fever) and plant pests (fruit fly, coconut white fly) were imported. These new diseases and pests have had a very important impact on animal and plant health, with some repercussions on food security (It is estimated that 30% of cattle has been decimated by theileriosis, and around 30 % of sheep by Peste des Petits Ruminants), and even public health (some human cases of RVF were confirmed in 2008).
- Impact of food borne diseases was also high: cholera outbreaks occurred sporadically until 2000, and diarrhoea represented 18 % of paediatric consultations in 2000 and parasitic diseases 15 % of all consultations<sup>6</sup>.

However, even if aspects related to domestic food safety and imports were not explicitly excluded from the project design, the need to address the reduction of sanitary risks related to imports in the development of the national SPS strategy, was not explicitly mentioned in the project rationale. It was not either reflected in the logframe, although it was a major SPS issue at the time of design. Instead, the project design was mostly geared towards facilitating exports, which was in line with the main STDF orientations at this time, but also with DTIS and PRSP.

This focus on exports can also be explained by the fact that, at time of design, there was a strong national political momentum to develop agricultural exports:

- Some major investments<sup>7</sup> were ongoing in the fisheries sector, that were expected to boost fisheries exports;
- Some efforts were also deployed by the Government, some farmers organizations and the French bilateral cooperation agency to support trade of vegetables between Comoros and Mayotte. This was a highly political decision aimed at boosting cooperation between Mayotte and other islands of the archipelago.

There was thus a strong need for enabling policy measures to allow these two flows of trade to take place: regulatory frameworks had to be established, capacities of fishermen and farmers had to be strengthened, certification and quality control processes had to be

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<sup>6</sup> Source: project proposal

<sup>7</sup> A Qatari project established a fish processing facility and distributed fishing equipment to small fishermen.



put in place. On top of this, the WTO accession process had been initiated in 2007, and the Government wanted to align its national SPS system with the requirement of the SPS agreement.

All these elements explain the strong project focus on exports, although SPS needs at the time of design were also related to domestic sanitary security. Focusing the project approach on exports has had two major implications, as described further in this report:

- Other SPS issues of major importance (in particular protection of the Country from sanitary risks related to imports) were not explicitly targeted, although they were considered as key by the Ministry of Agriculture and had a direct impact on food security and public health.
- This focus highly exposed the project to risks (see next paragraph). Having a more diversified strategic approach would have reduced the risk related to non-occurrence of assumptions.

## **(ii) Relevance to the SPS situation during implementation**

The main change in context that occurred during implementation is that the two export market opportunities that were identified in the project as outcome indicators, have not taken place:

- The investments by Qatar in the fisheries sector were suspended due to diplomatic issues between Comoros and Qatar, and the processing and export facility which was built never opened.
- The niche market for vegetables to Mayotte was never materialized, due to various issues including in particular inconsistency of supply (in terms of quality and quantity) and unpredictability/cost of maritime transport.

Another emerging market for fresh products, which was contemplated in the DTIS and PRSP was the high value niche market for hotels, which were supposed to be built in the scope of a governmental program to support the tourist industry. Due to the withdrawal of investors, these investments have not taken place as planned and this market today remains confidential.

This has indubitably weakened the Theory of Change of the intervention since the project was mostly designed to support these export flows (project outcome: *The national SPS system is able to support the country's agricultural export development strategies*); however, the rest of the rationale, in particular the absence of institutional (strategic and regulatory) framework, the low capacities and low awareness, remained valid.

However, even if the context has not been favourable to the attainment of the project outcome, we can consider that building national capacities to respond to new market opportunities will enable the country to take advantage of any new commercial opportunity that may arise, even after the project closure. At the date of the evaluation, even if the perspectives for the Fisheries sector were not very promising (the processing plant that was built by the Qatari investor is being dismantled), some remain for the vegetables export value chain, which the AFIDEV<sup>8</sup> project funded by AFD, currently starting, will support.

### **3. Added value and comparative advantage of the project.**

At the time of the design, and during implementation as well, this project was the only national project specifically targeting SPS issues (including capacity building and awareness, and institutional frameworks). Other programs supporting agriculture were mostly focusing on production and organization of value chains, including export value chains. The added value of the project was thus extremely specific and clear.

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<sup>8</sup> Projet d'Appui aux Filières d'Exportation et de Développement Agricole

With time and during implementation, other projects targeting SPS issues, all continental or regional<sup>9</sup>, appeared in the institutional landscape, but all had very specific focus (such as participation in standard setting process for PANSPSO) and finally appeared very complementary with this project. Others, such as Vet-Gov or IOC epidemio-surveillance projects were targeting aspects (animal health) not addressed by the project.

The project strategy, which was to establish the basis of a comprehensive national SPS system (regulations, capacities), was unique and conferred to the project a clear comparative advantage and specificity.

#### **4. Inclusiveness of the design and implementation of the project**

The actual original initiator of the project was the Ministry of Trade: This Ministry was in charge of the EIF and the WTO accession process and considered the project as a unique opportunity to implement the recommendations of the DTIS on SPS, and to fulfil some of the preliminary conditions for the WTO accession. The design of the project was conducted under their leadership, which explains why the project strategy was so much orientated towards trade facilitation.

The Ministry of Agriculture, which was in charge of managing SPS matters, was involved mostly at the design stage. So was the Ministry of Health which came on board after WHO was contracted. This is probably a reason why issues related to protection of domestic plant health, animal health, and even human health were not made prominent in the project design, although they were of foremost importance for food security and public health.

During implementation, the national project leadership was entrusted to Ministry of Agriculture, which was considered as more technically relevant on SPS issues than the Ministry of Trade. However, addressing issues related to exports were not their first priorities, because of the absence of agricultural exports at this time<sup>10</sup>, and the prominence of domestic SPS aspects.

This change in leadership between design and implementation penalized the country ownership, since priorities of the project initiator (promotion of exports), and those of the project implementor (food security and domestic sanitary safety) were slightly different.

However, even if the leadership of the project changed hands between the design and the implementation phase, the Ministry of Trade, along with stakeholders from the public and private sectors, were part of the project Steering Committee, and took part to all of its meetings.

Additionally, some important gaps and constraints of the SPS system in Comoros, that were already existing at project design, were somehow missed in the project design. These problems have even exacerbated during project implementation but were not really addressed, even if all stakeholders were fully aware of their existence and importance:

- Interisland trade is a major challenge in Comoros economy, and SPS matters are among the challenges that hinder trade flows between islands. SPS measures between islands are necessary, especially to protect Anjouan and Moheli from plant and animal pests and diseases which are present only in Grand Comoros. But the organization of this inter island SPS inspection and regulation remains a very complex institutional challenge, that exacerbates conflict of competences between islands and the central Government.

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<sup>9</sup> Vet Gov and PANSPSO funded by the EU and implemented by AU-IBAR and the OIE, regional projects implemented by IOC on surveillance.

<sup>10</sup> except of course vanilla, clover and ylang-ylang for which SPS issues are not of major importance

- A major issue affecting the operationality of sanitary control and certification is the institutional setup and respective roles of institutions under MoA. INRAPE<sup>11</sup> is the national research institute but handles import inspection and export certification. This was originally justified by the fact that the institute manages the only operational laboratory in the country. However, this contradicts official mandates of institutions and international good practices (for instance, as per OIE guidelines, animal health inspection and certification should be done by Veterinary services).
- Another issue, at the time of the design, was the conflict of interest between national authorities and island authorities regarding sanitary inspection. This problem was more prominent in Anjouan, where the main deep seaport is located, and where most of the imports land. In this island, sanitary inspection and certification were handled by the Island authorities, while imports inspection in Grande Comore, for instance at the airport, was handled by the Central Government through INRAPE.

In the context of very low public budget allocated to SPS activities, the substantial incomes generated by import inspection exacerbate institutional conflicts. This institutional confusion has highly contributed to the poor performance of sanitary inspection. The need to clarify this situation was however not mentioned in the project rationale and strategic approach and has never been addressed by the project.

## **B. Effectiveness**

The main tool used to assess this criterion is the project logframe. The attainment of project's goal (impact), outcome (project's objective) and outputs is assessed using the indicators and targets. Surprisingly, the project reported on the attainment of output indicators in the six-month reports but did not provide any detailed indications on the cumulated achievements regarding output indicators in the final report, which is a normal practice. The logframe provided with the final report was actually the initial version and did not indicate or demonstrate how far targets were actually met. It only showed what was expected (at the project start) and did not help in assessing the level of attainment of various targets. This thus had to be done through secondary information obtained from other sources (semestrial reports and final reports, final evaluation report and interviews), which were quite detailed and provided enough elements to evaluate the cumulated end of project achievements and compare them with targets.

The attainment or non-attainment of targets related to each indicator is explained when possible, by identifying and assessing the main constraints and risks faced by the project during implementation, as well as the conduciveness of the environment.

### **1. Overall judgement on effectiveness**

The effectiveness of the project is assessed as **satisfactory**. The quasi totality of project outputs were achieved, although some were with significant delay due to the complexity of the implementation setup. Unfortunately, the achievement of outputs did not translate entirely in a good achievement of outcome and goal. The main explanation for this is that the outcome was probably too much focusing on one aspect (facilitation of exports), which was very much subject to risks, while aspects related to domestic sanitary safety, which were also fully relevant for the country, were not reflected enough in the logframe at outcome level. The Theory of Change of the project, and the chain of results, was dependant mostly on one major assumption (emergence of export markets), which did unfortunately not occur.

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<sup>11</sup> National Institute for Research in Agronomy and Fisheries

## **2. Achievement of project goal, outcome and outputs**

The details on attainment of project's goal, outcome and outputs as well as their indicators are provided in Annex I.

### Achievement of outputs: achieved

Most of the project outputs were achieved: the capacity assessments were conducted as per plans, the sectorial road maps were developed based on the assessments, and an overall strategy was developed. All these processes were conducted in a participatory manner with consultation workshops gathering all categories of stakeholders, held during the development process of the documents, and at the end, for their validation. In addition, awareness campaigns and training activities were conducted as per the plan to ensure that stakeholders will have the necessary capacity and awareness to implement the plans developed.

### Achievement of outcome: partially achieved

The project outcome (*The national SPS system is able to support the country's agricultural export development strategies*) is only partially achieved, despite the achievements of most of the outputs. This is due to the non-occurrence of a major assumption on which the theory of change of the project was based: the structuring of the export sectors and identification of possible destination markets, leading to the emergence of export markets, both for fisheries and horticulture products. The project had a very limited influence on this assumption. The non-occurrence of this assumption was somehow identified as a risk in the project logframe, but no mitigation measure was envisaged.

### Achievement of goal: not achieved

The non-occurrence of the assumption on emergence of export markets had a major influence on the chain of results which was "broken", both between outputs and outcome, and between outcome and goal. The partial achievement of the outcome did not allow the achievement of the goal (*improving farmers' incomes*), which was entirely conditioned by the occurrence of the assumption.

The assumption that export markets would "automatically" emerge if a stronger SPS system was in place, was subject to too many other conditions to occur. If adequate SPS systems are necessary for trade flow to happen, this may not be always sufficient, especially in countries with a volatile economic environment. Another necessary condition which is needed for this trade to happen is private investment, which is a recurrent issue in Comoros because of inadequate business climate. Other aspects such as transport, which is the main constraint for export to Mayotte, can also prevent this type of assumption to occur.

However, this does not mean that the project has failed as explained later in the section on impact. The project was supposed to setup a conducive institutional environment to allow these exports to occur, and it has done so; it was not supposed to be at the origin of these exports, which was out of its reach and was the responsibility of the private sector mostly.

As of today, the institutional framework is in place, and capacities and awareness have been improved. This is an asset that the project significantly contributed to, which will last for a few years more, and we can consider that when the fisheries and vegetable sectors will be ready to export, they will benefit from this work. For fisheries, the ongoing dismantlement of the Qatari built fish processing facility, is however jeopardizing these prospects. For cash crops and vegetable however, the implementation of a new project funded by AFD could hopefully result in the resumption of vegetable exports to Mayotte in a near future.

### 3. Major factors, including occurrence of risks and assumptions, influencing the achievement or non-achievement of the project goal, outcome and outputs

As mentioned above, the main reason for the partial achievement of project outcome and the no-achievement of project goal is the non-occurrence on a major assumption on emergence of export markets/niches. This assumption was consistently mentioned in the project document (context, rationale, objective) and somehow reflected in the logframe (see assumption N°1 & 2 below).

The risks and assumptions that were identified in the project are mentioned below, together with a comment on their occurrence and their influence on achievement of the goal, outcome and outputs:

| Assumption  | Occurrence / influence   |
|---|--|
| The Government succeeds in establishing an enabling environment with incentives for entrepreneurship and agricultural investment                                    | <p><b>Did not occur</b></p> <p>This assumption did not really occur, and this partly explains why the contemplated exports did not take place. This is a recurrent problem in Comoros where potential foreign investors are often discouraged by the lack of conduciveness of the institutional business environment<sup>12</sup>, and abandon their investment projects after a few years.</p>  |
| (Other) Projects aimed at organising agricultural value chains achieve their objectives in terms of structuring the sectors and identifying the destination markets | <p><b>Partially occurred</b></p> <p>Very few projects have supported emerging agricultural export value chains during the project implementation period, and for the few that made an attempt to do so, (AFD for vegetable exports to Mayotte, and Qatar for fisheries), their efforts were not conclusive.</p> <p>However, traditional export value chains (vanilla, ylang and clover) were already structured and their markets identified</p> |
| The Government is committed to providing international experts with the documents and personnel needed to make the diagnosis  | <p><b>Occured</b></p> <p>The availability of international expertise, documents and national personnel has been satisfactory and has not hampered the implementation of the project.</p>   |
| UNDP fully assumes its key role in generating the same level of engagement at the highest level of government as GPRS   | <p><b>Partially occurred</b></p> <p>As mentioned in the section 3 below on role of UNDP, and according to the point of view of several officials interviewed during the evaluation, the implementing agency faced some difficulties in generating an optimal ownership of the project by the national actors.</p>  |
| The choice of the Project Coordinator is crucial. In addition to sufficient knowledge of the SPS, it must have the  | <p><b>Occured</b></p> <p>The UNDP technical coordinator was up to the task in terms management capacities. On the technical point</p>  |

<sup>12</sup> Comoros was ranked 160<sup>th</sup> in the "Doing Business" study 2020 (World Bank) which assesses the efforts deployed governments in ease of doing business.

|   |   |
|---|---|
| <p>makings of a mobilizer, and must demonstrate dynamism and leadership. The risk is that this profile is difficult to find</p> | <p>of view, he was not fully acquainted with agriculture related matters, but this capacity gap was compensated by the fact that the National coordinator at MOA had an agricultural background. The two profiles were complementary, and the two experts shared responsibilities related to monitoring and support to project activities according to their backgrounds. The evaluation did not receive any particular comment on key project staff weaknesses.</p>  |
| <p>The political situation remains stable over the project period without major changes at the decision-making level</p>        | <p><b>Partially occurred</b></p> <p>The political situation in Comoros is structurally volatile but this has improved during the last decade and during the project implementation period. Several government re-shuffles have occurred during the period, but agriculture/fisheries and trade have remained under the same ministries.</p> <p>The main political issue that has hampered the implementation of the project is the conflict of competence between autonomous islands and the Central Government, including on issues related to sanitary control of trade. Since 2018 and the adoption of the new constitution, the level of autonomy of islands has been reduced and this problem should now be minimized.</p> |

#### 4. Other risks, not anticipated:

One risk that occurred in several instances and affected the attainment of outputs, is the absence of official adoption of some of the legal frameworks that were developed by the project, which thus remained at the draft form. In other instances, legislations were adopted, but the enforcement regulations were either not developed, or developed and not adopted, which also limits the impact of the activity (The list of legal frameworks that were affected by this situation is provided below). This risk is recurrent in Comoros and has affected in the past many other policy, strategic or regulatory frameworks<sup>13</sup>. This lack of political uptake seems to be due to a combination of factors: lack of political will in some cases, excessive bureaucracy, and high turnover of high-level decision makers (Ministers and Secretary General). It is worth to note that the National SPS strategy, which was the main project output, has not been subject to this risk and has been officially adopted by the Council of Ministers in 2017 (its implementation however remains a challenge as mentioned in the section on Sustainability).

If there is no post project follow up on the adoption of these texts still at the draft stage (see recommendations further), the risk the risk that they will never be adopted and that they will simply be forgotten is real.

|  |   |
|--|---|
| <p><b>Legal frameworks developed with the support of the project but never adopted</b></p> | <p><b>Legal frameworks that were drafted and adopted but for which enforcement regulations were not</b></p> |
|--|---|

<sup>13</sup> E.g. Two draft National Agricultural Strategies were developed (one in 1994 with the support of the EU, one in 2013 with the support of FAO), but were never officially adopted, a draft livestock policy and a veterinary legislation have been developed in 2016 with the support of AU-IBAR, but are still at a draft stage as well.

|                               |  |
|-------------------------------|--|
| Law of phytosanitary products | Plant health law (application texts not drafted)   |
| Fisheries code                | Food safety Law (application texts were developed with the support of COMESA but not adopted)  |
|                               | Six ministerial orders on monitoring, inspection, analysis and certification of the quality and safety of fish products destined for the local and international market. (Drafted but not adopted) |

Another important risk that has affected the project and in particular the changes in behavior, is the lack of means at the disposal of stakeholders to implement good practices and standards promoted by the project. This situation can for instance be illustrated by the example of awareness campaigns with fish vendors. Vendors could not implement the basic hygiene recommendations of the campaign because of the absence of equipment (ice boxes) to do so. Another example is the incapacity of the plant health services to enforce the law on phytosanitary products, because of the lack of human resources and vehicles. It is true that it was out of the scope of the project to provide this kind of “hard” support, but this problem limited effectiveness of some activities.

## 5. Implementation setup

UNDP, as the implementing agency, signed the contract with WTO and later signed LoAs with associated international partners.

The choice of UNDP as implementing agency was guided by various reasons, including the fact that, at the time of the design and project start, the Enhanced Integrated Framework (EIF) National Implementation Unit (NIU) was housed by UNDP. However, during implementation, the EIF NIU was transferred to Ministry of Trade, and did not play a major role in project steering, as initially expected.

This type of implementation arrangement is also a common feature of STDF funded project for which implementation leadership is often entrusted to international/regional organizations.

The choice of UNDP among UN institutions was however challenged by some stakeholders. FAO, because of its mandate, core area of interventions, and in particular its role in IPPC and Codex, could have appeared to be more indicated to implement such a project. The choice of UNDP instead of FAO was, according to the project initiators, guided by the limited size and staffing of FAO Office in Comoros, compared to UNDP which is the lead UN agency in Comoros, and implements many projects including in agriculture.

The main negative implication of the project implementation being done by an international organization, according to several government Officials, was the low level of implication and ownership of some government entities in project steering. According to them, the implementing agency at that time had worked too much in isolation, with insufficient feedback to the two ministries. The fact that the role of national coordinator was entrusted to a MAPE official, who was indeed involved in implementation, was, according to them, not conducive enough to create the ownership of the project by national institutions that would have been required for more sustainable results.

This setup has also led to implementation complexity, with some consequences on disbursement, which was slow<sup>14</sup> according to some of the key national partners. The administrative cost ("General Management Support Services" 7%) was also perceived as a worthless expenditure by some stakeholders.

The delegation of activities by the implementing agency to associated international partners, which is not common in STDF funded projects, arouse mixed feelings: the positive side is that associated international partners were able to mobilize competent specialized international experts; the negative implication is that signature of LoAs (especially with FAO<sup>15</sup>) has led to major implementation delays.

Regarding the role of FAO specifically, although it was recognized by all stakeholders that the expertise provided had a high level of competency, the implementing agency (UNDP) and the main national partner (MAPE) highlighted the difficulties related to the fragmentation of responsibilities between the FAO national office, the Regional representations in Antananarivo and in Harare, and the Headquarters in Rome. In terms of FAO's implementation of its activities, there were considerable delays in mobilizing expertise for food safety and the fisheries sector. In particular the mobilization of the expert for the SPS strategy that dragged up to 2017.

Some national partners also expressed reservations about the contribution of WHO, which from their point of view did not work in a sufficiently inclusive manner. WHO however worked in close partnership with the Ministry of Health, to which it delegated the organization of awareness campaigns on Food Safety. The Ministry of Health has then delegated their organization to two local NGOs<sup>16</sup>. However, it was highlighted by several key actors that neither the Ministry of health<sup>17</sup>, nor the contracted NGOs, had experience and competencies in food safety. Giving the leadership of the awareness campaigns to the Ministry of Agriculture, which has more competencies on food safety, could have been an alternative option. However, at the time of the project formulation, in the absence of SPS strategy, there was no clear allocation of responsibilities regarding food safety between Government Agencies and this may explain that this choice was not grounded on official mandates.

Despite the above-described complexity and shortcomings in implementation arrangements, it should be highlighted that the implementing agency was quite efficient in coordinating, planning and synchronizing activities carried out by various partners, including by mobilizing external partners such as COMESA, IOC and AU-IBAR that were not part of the initial project partners, but added value to the implementation.

## **6. Effective and adequacy of methods and tools used for training of stakeholders and raise public awareness**

Training was undertaken in a very conventional manner: training workshops with 20 to 30 participants were held on various topics (trade facilitation, project management, standard setting, WTO SPS agreement). The methodology was pretty much the same for all these workshops, with usually plenary presentations by experts, followed by group works for appropriation, and self-evaluation. The beneficiaries were very satisfied with the trainings

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<sup>14</sup> All disbursement had to be approved both by UNDP and Ministry of Agriculture, which led to recurrent delays (1 to 2 months in average according to MAPE)

<sup>15</sup> The MoU with FAO was signed in May 2014, the one with ITC in April 2014 and with WHO November 2013.

<sup>16</sup> Plateforme Femmes Développement Rural et Sécurité Alimentaire, and Réseau femmes et Développement



according to the evaluations conducted, but this does not give an indication of the training impact. This classic training approach has the advantage of being very familiar to the audience, and for such topics, they have proven to be quite effective in various contexts. However, since evaluation of competencies of training beneficiaries were not conducted, it is difficult to ascertain that they had a real impact on the beneficiaries' capacities.

For awareness raising, a wide range of methods were used, ranging from focus group discussions, lectures in schools, production of leaflets, banners and billboards, and organization of media campaigns. The evaluator could not meet the final beneficiaries to assess if the methods used had been effective in influencing their mindset and practices on hygiene and food safety; but we could assume that, with such a variety of means, it has been the case.

## **C. Efficiency**

### **1. Overall judgement on efficiency**

The efficiency of the project is rated as **very satisfactory**: all planned activities were implemented except one (on establishment of SPS information system) which was not fully relevant in the context of Comoros. Most of the activities, especially those implemented by FAO, were implemented with delays, but these delays were mostly due to external factors (bureaucracy of international organizations and national institutions) on which the project had limited influence, and adequate adaptation measures (especially the project extension) were taken to address them. Other risks, most of them having been identified in the risk matrix, occurred, but this did not influence significantly the implementation of activities and the delivery of outputs. The cost effectiveness was not optimal, especially for trainings (see paragraph 3 on cost effectiveness below), but this is classic feature of projects in Comoros.

The detailed answers to the evaluation questions pertaining to efficiency are provided below:

### **2. Compliance of activities and outputs delivery with to the project plans and budget**

To answer this question, we conducted a similar analysis as for outcome and outputs, using the project logframe and checking for each activity mentioned in the logframe if it was implemented as initially planned. The sources of information to conduct this check were the project implementation reports, but also the interviews conducted with the implementing agency, the associated international partners and the national partners.

The main tool used by the evaluation to judge the timeliness of implementation were the initial overall workplan (annexe I to the final project proposal), but also the semestrial work plans and those of each associated international partner (as part of the contracts).

Regarding financial efficiency (i.e. were activities implemented within budget), it has been impossible to answer this question for each activity (except for awareness campaigns), since financial reports do not provide details of financial execution per activity, but only by budget line. This question is thus only answered in general.

The detailed answers per activity are provided in Annex II.

As shown in the detailed table (In annex II) all activities, with the exception of the activity on establishment of an SPS information platform, have been fully implemented. Most of them were however implemented with significant delays.

Activities that were implemented with the most important delays are those implemented by FAO, which is due both to the late signature of the LoA, and to the challenging mobilization of experts. At the opposite, activities implemented by ITC were mostly

implemented on time. Delays in implementation can also be explained by the complex procedures for decision making and release of funds, and by the high level of bureaucracy in the country. These delays have led to the extend the project implementation period four successive times, in March 2015, March 2016, December 2016 and December 2017.

The only activity that has not been implemented as per the initial plans, is the establishment of a SPS digital information platform. This activity was considered as poorly relevant in the Comoros context, including because of poor access to electricity and internet. It has been instead implemented through another approach, which was the creation of a national SPS committee. This was in line with the recommendations of the African Union at this time, and the activity was implemented in partnership with AU-IBAR, through the EU funder PANSPSO project: as recommended by the African Union to all its member States, a national SPS committee composed of the main public and private stakeholders involved in SPS matters was established, with the support of the PANSPSO project implemented by AU-IBAR. However, like in most of the countries where this was initiated, the sustainability of this committee has been an issue and it has never met after the initial workshop.

The fact that almost all activities have been implemented as per the plans, logically allowed the project to deliver most of the expected outputs as mentioned above under the section on efficiency.

In terms of conformity to financial plans, the table below on financial execution shows the following:

- The budget has been executed at a rate of 99% which is very satisfactory.
- The budget directly related to activities (workshops training, missions) has been disbursed as or below the plans, while operating costs (staff, operating costs) have been slightly overspent. This can be easily explained by the multiple project extensions and does not represent a major deviation from the initial budget.

| <b>Designation</b>      | <b>Amount allocated STDF</b> | <b>Total Expenses</b> | <b>Balance</b>   | <b>% disbursed</b> |
|-------------------------|------------------------------|-----------------------|------------------|--------------------|
| Staff                   | 358 117                      | 377 717,89            | - 19 600,89      | 105%               |
| Travel Experts          | 119 900                      | 91 862,57             | 28 037,43        | 76%                |
| Training                | 149 800                      | 150 536,14            | - 736,14         | 100%               |
| Workshops               | 99 800                       | 78 744,32             | 21 055,68        | 79%                |
| Computer & Lab Hardware | 10 000                       | 10 000,00             |                  | 100%               |
| Service contract        | 220 000                      | 229 568,37            | - 9 568,37       | 104%               |
| Project M&E             | 15 000                       | 18 062,46             | - 3 062,46       | 120%               |
| General expenditures    | 30 000                       | 40 939,78             | - 10 939,78      | 133%               |
| Other expenditures      | 749                          | 3 599,01              | - 2 850,01       |                    |
| Indirect costs          | 72 357                       | 73 415,27             | - 1 058,27       | 101%               |
| <b>TOTAL</b>            | <b>1 075 723</b>             | <b>1 064 445,80</b>   | <b>11 277,20</b> | <b>99%</b>         |

### **3. Risk management**

Comment: the risks and assumptions related to outputs have already been addressed in the section on efficiency. In this section, the focus will be on risks related to activities.

The table provided in Annex III recapitulates the assumptions (there are only assumptions in the logframe, no risks) contained in the logframe, with for each of them, comments on their occurrence:

Many assumptions associated with activities did not occur or partially occurred. However, this did not affect significantly the achievement of outputs as it should be the case. One of the reasons for this is that many of these assumptions (allocation of funds, emergence of export markets) are actually of higher level and prevent outputs to be translated into the expected outcome, but do not affect implementation of activities. The assumptions that are strictly activity related (e.g. engagement of media) occurred for most of them, which explains why activities could be implemented and led to a very good achievement of outputs.

In the frequent cases of occurrence of risk/ non-occurrence of assumptions, the project generally responded in an adequate way, when it was feasible:

- The idea of establishing a digital SPS information platform was not pursued and an alternative solution was found (although not very conclusive neither)
- The project duration was extended to allow the activities to take place;

Some risks were clearly above the reach of the project, in particular the absence of emergence of export markets; the project was not equipped to do anything to influence the situation.

Regarding the lack of political will, which has in particular hampered the enforcement of legal frameworks and implementation of some measures contained in the action plans, the project could probably have done better: high level awareness and lobbying campaigns could have been conducted with decision makers (Ministers and General Secretaries, MPs) to convince them on the need to advance the policy reforms and adopt the proposed texts. This was not really planned for in the project design, and this has unfortunately not been done.

#### **4. Cost-effectiveness**

The cost of the project (USD 1,075,723) could appear low compared to other projects implemented in the country, that usually range from USD 5 to 15 million.

However, compared to other STDF funded projects, especially those that were initiated during the same period, it is in the higher range, especially considering the size of the country and its economy.

One criterion to assess cost effectiveness is the cost of activities per beneficiary:

- For trainings, a total budget of USD 150,000 was spent, for a total number of beneficiaries of around 223 beneficiaries<sup>18</sup> (including participants to exchange visits); the cost per participant is thus USD 673, which is quite high but can be explained by the high cost of international exchange visits, and also by the cost of inter-island air tickets for training participants from other islands, which always increases the cost of training and workshops in Comoros.

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<sup>18</sup> 20 trained by ITC on international trade, 33 + 30 by STDF on SPS agreement and 3 sisters, 25 by AU-IBAR on participation to standard setting, 60 on food safety and hygiene, 30 on project cycle, 15 on fisheries + 10 participants to 45 exchange visits (Source, annual project reports)

- For awareness raising, a total budget of USD 229,749 was spent by WHO for awareness campaigns, which reached 15 631<sup>19</sup> persons. The cost per beneficiary is thus USD 14.6, which is very reasonable.

The total cost of international expertise (USD 91,852) also looks reasonable considering the number of international missions organized and the multiple outputs of this expertise (assessments, action plans, strategy).

Considering the above, we can affirm that the cost effectiveness of the project was moderately satisfactory, which is not unique to this project, and mainly due to the high cost of living and transport in the archipelago.

#### **D. Impact**

Assessing impact of a project promoting institutional changes is complex. The evaluation tried to assess in particular the impact of the project related to the STDF programme, including improved market access, trade facilitation, better control of imports and improvement in national SPS situation.

One important challenge we faced in the impact evaluation was to attribute or not the responsibility of these changes to project activities, or to assess the level of contribution of the project to these changes, considering that other programs or initiatives have also been active in the SPS domain during the same period.

##### **1. Overall judgement on impact**

The impact of the project is rated as **satisfactory**.

The project has not had a significant impact on trade and on domestic situation yet but has laid the necessary settings for this to happen when other conditions will be met. The impact on participation of Comoros in standard setting is assessed as marginal, despite some capacities and awareness built on this topic. The project has also benefited from the political momentum created by the WTO accession process and has in turn positively contributed to support the accession.

On the other hand, the project had a significant impact on awareness of both officials and final beneficiaries. One of the major consequences of this better awareness was the mobilization of financing and technical support from other sources, to support SPS activities, which confers to the project a very good spill over effect.

The detailed answers to the evaluation questions on impact are presented below:

##### **2. Project contribution to higher level objectives of the STDF programmes such as a measurable impact on market access, improved domestic SPS situation, and/or poverty reduction?**

At this stage, it is difficult to affirm that the project has contributed to improve higher level objectives of the STDF programme:

- On market access, we can only affirm that the project has substantially improved the conduciveness of institutional environment for trade, in particular by establishing SPS institutions compliant with the requirement of the SPS agreement (the Fisheries Control and Certification Office, the NPPO), by creating a more comprehensive regulatory environment (food safety law, phytosanitary law), and by building national capacities. But these important changes have not borne fruits yet in the domain of market access,

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<sup>19</sup> 8,386 pupils, 1,800 market vendors, and 3,445 producers (Source: WHO final report)

because of the non-occurrence of assumptions and conditions that were external to the project.

- On the domestic SPS situation, the overall impact is uneven, but more positive: on animal health, the project contributions were very indirect and the draft regulations that were developed having not been adopted yet, the contribution of project is minimal. On plant health, the establishment of the NPPO, and the development of a complete set of regulations on plant health, should have improved the country's situation. However, because of the extremely low funding of plant health protection activities, the impact is still unclear on the ground. On food safety however, some significant changes can be attributed partly or entirely to the project: the awareness campaigns had a good outreach (around 15,000 persons) and have certainly contributed to change their practices on hygiene and food safety. Of course, the impact of this awareness raising has been limited by the lack of means at the disposal of beneficiaries, to implement the changes. But several stakeholders mentioned that the hygiene situation of markets targeted had improved, with in particular a better management of waste, which should have a positive impact on domestic food safety. It should also be noted that this important spillover effect and impact had not been contemplated in the project logframe as already mentioned, and is not reflected by any indicator (a possible indicator would have been: % of market vendors reporting a change in hygiene practices).
- On poverty, no significant change can be expected at this stage since poverty reduction is supposed to be triggered by increased exports.

### **3. Expected and/or unexpected impact on the final beneficiaries**

Except on basic hygiene at production and retailing level, which is an important domestic impact, there are no evidence showing that the project made a real difference on final beneficiaries, especially from the economic point of view. On traditional export crops, vanilla in particular, the evaluation could not identify any difference made. However, if the assumptions related to emergence of new export markets happen to become reality, which could occur in the next months/years, the situation could change and some concrete benefits could be felt, especially for the following groups of beneficiaries:

- Fishermen, who will be able to access to the export market, with bigger volumes and better prices than the current domestic market (when the fisheries factory built by Qatar will be handed over to a foreign private operator and start operations, which is planned for 2021);
- Vegetable growers, especially in Anjouan, who may be able to resume exports of vegetable to Mayotte Island in a less occasional way (with the support of the AFD funded project, and as part of bilateral agreements between France and Comoros); the Mayotte market can be very lucrative with for instance prices of tomatoes 10 to 20 times higher in Mayotte than in the other Islands of the Archipelago.

### **4. Role of the project, in raising awareness on SPS challenges and/or mobilizing additional resources for SPS capacity**

This is for sure one aspect in which the project has made a real and substantial change. Even if these objectives were not really reflected in the logframe, considering that this is an important aspect in the STDF strategy (catalyzing and influencing change), this achievement could be considered as a major success.

The main achievement related to awareness raising was recorded with officials in public institutions, and executive of civil society organizations. All those interviewed in the scope of the evaluation highlight the need to better take into account SPS matters in development initiatives and in investments, which was not the case at all when the project started. This awareness raising was also pushed by the political momentum created by the WTO accession process, which provided strong justification for improving the national SPS system. Unfortunately, this change of mindset has not been fully translated into actions

because of the unavailability of resources to finance SPS activities. However, it contributed to intensify efforts to raise funds to finance activities, and these efforts start paying now, since several donors have now pledged support to SPS investments (see question 6 further).

This willingness of government officials to better finance SPS activities has been illustrated by the insistence of government officials to include a substantial amount of funds into the NAIP budget, which will be the main tool for mobilizing resources for the agricultural sector in the next 5 years. A similar attitude of Government officials was observed during the design of several projects starting or in the pipeline (PIDC funded by World Bank, PREFER-Livestock funded by IFAD and AFIDEV funded by AFD).

With the larger audience of producers and value chain actors (market vendors in particular), we could assume that, considering the number of people reached, the impact of awareness campaigns would be good as well; it was unfortunately not possible to verify this with the grassroots level actors, as it should be the case, because of the specific conditions of the evaluation, which did not allow field visits to take place. The main feedback we got from NGOs in charge of implementing the awareness campaigns is that the target audience was very receptive to the messages, but that their translation into concrete improved practices was limited by the unavailability of resources to cover the cost of these good practices.

## **5. Project contribution to participation of Comoros in the standard setting process (OIE, IPPC, Codex) and activities of the WTO SPS committee**

The project did not specifically target the participation of Comoros government representatives in standard setting organizations and WTO SPS committee, which was not reflected as such in the logframe. However, it did contribute to improve this aspect to a certain extent as follows:

- Two training workshops on the WTO SPS agreement and 3 sisters, including the functioning of the standard setting process, were held (60 participants in total).
- A common workshop was organized with AU-IBAR and COMESA, in the scope of the PANSPSO project, which was specifically aiming at improving the participation of African Union Member States in the standard setting process.

The discussions held during the evaluation with the OIE delegate, the NPPO and the outgoing Codex Focal point have demonstrated that their knowledge of the standard setting processes is now excellent, which was not the case at all 13 years behind.

However, all confirmed that this awareness had a limited impact on the real participation in the standard setting processes, because of the lack of resources to finance this participation, and in particular the attendance to the 3 sisters' meetings:

If we observe at the participation of Comoros in the IPPC CPM and Codex CAC meetings<sup>20</sup>, we can note the following:

For Codex, between 2012 and 2019, Comoros attended only twice meetings of the CAC commission, in 2013 and 2014<sup>21</sup>, and this participation was financed by the African Union. We cannot thus conclude that there was an improvement over the period and cannot either attribute the participation in 2013 and 2014 to this project.

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<sup>20</sup> Attendance to CPM and CAC can be considered as the most illustrative of the project impact, since the project worked only marginally on animal health.

<sup>21</sup> Source Codex Alimentarius CAC meeting reports

Regarding IPPC, Comoros attended 6 meetings during the same period (2012, 2013, 2015, 2016, 2017 and 2018) and was absent in 2014 and 2019 only<sup>22</sup>. The participation of Comoros was financed by IPPC. Since the country participation was already good before the project, and due to IPPC funding mostly, no conclusion on project contribution can be drawn.

Finally, regarding participation of the private sector to the standard setting process, we cannot conclude that the project has improved the situation, as this participation remains inexistant today. The National SPS committee that the project supported together with AU-IBAR and COMESA was supposed to address this issue, by helping to consolidate national positions, but this committee never met after its creation.

Therefore, the contribution of the project to participation of Comoros in standard setting, which was not part of the initial project objectives, cannot be considered as significant. However, we can assume that the increased awareness on SPS issues could somehow contribute to play an indirect role in Comoros participation in the future.

Finally, officials engaged in international trade negotiations, in particular those related to the EPA agreements, and to the COMESA free trade area, mentioned that the trainings undertaken in the scope of the project improved the negotiation capacities of Comoros representatives.

## **6. To which extent did the project contribute to the country's WTO accession process?**

At design stage, no contribution of the project to the accession process was envisaged, or at least reflected in the project document and logframe, although the accession process was already ongoing (the Comoros' working party for accession was established in 2007; the first working party meeting took place in 2016).

However, during the project implementation, the accession process has become a strong driver for the project: the officials engaged in the accession negotiation (in the Ministry of Trade and the Geneva mission) realized that having a solid SPS institutional framework was a necessity for the country to comply with the accession requirements and conveyed this message within the government.

The documents produced in the scope of the project, including in particular the sub-sectoral assessments, the SPS strategy, the sectoral action plans, and the regulatory frameworks have been submitted to the working party (WP) as part of the accession file, to show the commitment and good will of the Country, and comply with the accession requirements. All these documents, including both those at the draft stage and those adopted, have been included in the "Legislative Action Plan", which is communicated to other WTO members. They have been scrutinized by the WP members as other aspects of the legislation and had not raised any comments from the WP members up to recently. Most of the comments and questions from WTO members were so far focusing on other aspects such as tariffs and intellectual property, and SPS had not attracted the interest of WP members. However, after the last meeting of the Working Party that took place in September, several SPS related questions were raised by one member (USA). Part of the questions are related to the effective implementation and enforcement of SPS measures provided for in the strategy and laws. The Government may face some difficulties in providing evidence it will have the capacities and resources to implement all these measures, considering in addition that several laws were not accompanied by Ministerial Orders<sup>23</sup> for their enforcement. Another

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<sup>22</sup> The absence to CPM in 2014 and 2019 was due to the lack of no-obtention of visa by the Comoros delegation.

<sup>23</sup> In the Comorian legislative system, as in many French-speaking countries, the enforcement of laws requires decrees or Ministerial Orders that define the practicalities of law enforcement.

issue raised by the same WTO member is the absence of formally adopted animal health legislation, and the inadequate application of the equivalence and regionalization principles in animal health domain, which in the view of the commenting country should be considered as a condition for the accession.

## **7. Project role in initiating, stimulating and leveraging partnerships that have generated spillover effects and synergetic benefits**

This aspect is directly related to the outcome 1 of the STDF strategy (more synergies and collaboration driving catalytic improvements). This is one of the aspects on which the project had the most significant impact. The main facts and evidence related to this spill over effect are as follows:

- The formulation by FAO of a detailed feasibility study for a food safety laboratory (including for fisheries) has been used by the Ministry of Agriculture for fund raising with donors and has led to the financing of the laboratory by Japan International Cooperation Agency (JICA). The total amount of the JICA support is around USD 3 M, which is three times the total amount of the project. The existence of this laboratory, which should be operational in 2021, will allow Comoros to undertake proper and mutually recognized control and certification of fisheries products when the existing processing facility will be operational. It will also allow proper control of imports, in particular of fresh food of animal origin, which represent important volumes (11,000 tons of frozen poultry meat imported by year) and represent a high food safety risk.
- An additional financing of USD 160,000 has been mobilized with COMESA at the end of project implementation period, to support the formulation of enforcement regulations for the Food safety Law, that had not been formulated with the support of FAO.
- Complementary support has been provided by the OIE on the animal health domain, that was covered only marginally by the project. The OIE legislation mission (2014) and the Gap Analysis (2016) were conducted by the OIE during the project implementation period and funded under the EU financed VetGov programme. However, if there were some synergies and collaboration between the project and the OIE initiative, it cannot be ascertained that the project played a significant role in these efforts, which would probably have taken place anyways.
- The OIE assessments were followed by the formulation of a draft veterinary legislation, supported by AU-IBAR in the scope of the same VetGov programme. Although it complemented the project achievements on the animal health side, the contribution of the project to this achievement can also be considered as minimal.
- The project had strong complementariness and synergetic effects with an FAO TCP project supporting the establishment of the Codex, implemented during the same period.
- As mentioned earlier, several SPS investments, amounting to USD 4M, were included in the NAIP budget, which is the main fundraising tool of the Government for the next 5 years, and should be financed by various projects in the pipeline (AFD, World Bank and IFAD).

The impact of the project on this aspect is thus considered as very significant; this is a major achievement and success of the project, and this is fully in line with the project intended approach and the STDF principles.

## **E. Sustainability**

The sustainability of the project has been assessed by looking at both the measures taken by the project to ensure the sustainability of actions and benefits, and by assessing the actual continuation of these activities and benefits. Conducting the evaluation two years after the project closure has facilitated this assessment which can be based on facts.

### **1. Overall judgement on sustainability**



The sustainability of the project is rated as **moderately satisfactory**.

The main outputs of the project (capacities, awareness, institutional framework) are relatively long lasting and do not disappear after the project end. However, the sustainability of these outputs is jeopardized by the lack of resources to finance implementation of SPS measures, in particular core national resources. The implementation setup of the project has not contributed to a proper appropriation by national institutions, and low ownership has led to poor allocation of resources. This aspect has not sufficiently been anticipated in its exit activities.

Details on evaluation findings on sustainability are provided below:

## **2. Durability of project benefits**

The continuation of benefits varies according to their nature:

**Awareness:** the awareness of officials on SPS issues, which is one of the factors that will ensure proper investments in the domain, remains high 2 years after the project closure. This level of awareness is not expected to be eroded in the future since it is maintained by other initiatives.

**Capacities:** the capacities built by the project will also continue for a certain time but should be updated to compensate the high turnover in public administrations, where many officers are close to retirement. Refresher courses and initial trainings for newcomers will thus be needed in a near future to ensure the maintenance of capacities. Since it would not be possible for STDF to support these trainings, MoA should ensure that they are undertaken with the support of other development partners active in the SPS domain (AFD, FAO, IOC). See section on recommendations.

**Legal and regulatory frameworks:** the legal and regulatory frameworks that have been adopted are solid assets that will last and serve the purpose for a long time. Regarding those that have not been adopted yet, or lack enforcement regulations, there is a risk of loss of institutional memory, and the draft documents could easily be “forgotten”, as it has been the case for other draft strategies or laws in the past. There is therefore a need for post project follow up on this. FAO, which is the originator of most of the draft texts, and has permanent support capacities in the country, could be an adequate institution to follow up on and support the final adoption of these regulations.

## **3. Capacity of project recipients to sustain the results**

Limited capacities of project beneficiaries has hampered impact as mentioned above, but it has also affected sustainability negatively: In several instances, activities carried out by national partners with the support of the project have stopped at the end of it, even if they were fully part of the institution’s attributions. This can be sometimes due to the lack of staff available for this activity, but most of the time to the absence of budget and operational means (e.g. vehicles).

One good example of this situation is the implementation of awareness campaigns on food safety and hygiene. These campaigns have stopped when the contract with WHO, Ministry of Health and NGOs was terminated, because the Ministry did not have any human resources and budget to pursue these activities, although it is part of its mandate. The implementing NGOs shifted to other domains, not SPS related, on which they had some financial opportunities.

In the same vein, despite the existence of regulatory frameworks on plant health and pesticides, the control implemented by the Ministry of Agriculture remains very limited, because of the quasi absence of resources dedicated to this activity.

Regarding investments planned within the various action plans, the situation is a bit better since development partners have shown their interest to finance some of them; however, as it is often the case, development partners are ready to finance hard investments, but

not day to day operations of SPS institutions, which should in theory be financed under the Government core resources. The resulting situation is that investments in infrastructures such as laboratory, quarantine, are financed by donors, but their operational costs are not covered by the Government, which in the end obviously affects the impact and durability of such investments.

#### **4. Planned and/or follow-up activities required to sustain these results over time**

After the project closure, there were no follow up activities implemented either by the implementing agency, the associated international partners, or by the Government, to sustain the project results, for instance to mobilize funds to finance the implementation of the SPS strategy, or to follow up on the adoption of regulatory texts.

The national SPS committee (see paragraph IV.C. 2) should have played this role but the mechanism has never been appropriated by any institution, and its operations have never been financed. However, having such a national SPS task force, composed of the main SPS actors was probably the best way to ensure a follow up of the SPS strategy and the different action plans. But the financing of such a mechanism will be a challenge, in this archipelago where each and every national meeting requires expansive air tickets to enable all islands to attend.

#### **5. Major factors which influenced the project sustainability**

The main factors that influenced, positively or negatively, the sustainability of the project, are the following:

- The inclusiveness of design and implementation (see question 6 below), and ownership by national institutions, which was not optimal.
- The existence of other programs and initiatives that could continue or build on project activities: on this, the post project context has been quite favorable, and several national and regional programs today contribute to consolidate or build on project outcomes (see section on impact/synergies).
- The availability of resources necessary to translate institutional frameworks (strategies and action plans) into realities. Although some of these resources may be availed by development partners to fill some of these gaps, the financing of day-to-day operations of SPS institutions remains a major issue.
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#### **6. Contribution to sustainability through follow-up activities, scaling up and dissemination of results**

As mentioned above, one of the key factors that negatively influenced the project sustainability is the lack of core financing of SPS functions, after the project end. As suggested by several stakeholders, it could have been relevant to envisage organizing pledging and advocacy sessions, to facilitate this handover of responsibilities and further financing. These sessions should involve both development partners, which are often eager to respond to relevant and well formulated financial requests, and decision makers in charge of public budgeting (MPs for instance), to ensure also a core financing by permanent national resources. The project had planned to organize such pledging and advocacy activities after the adoption of the SPS strategy, but it could not be done for various reasons. It was thus decided to wait for this ex-post evaluation to be completed to carry out this activity, which seems to be a workable solution as well (see recommendations), even if the organization of such event outside the project framework may be more challenging. It should also be noted that the adoption and implementation of the NAIP, which includes substantial investments in SPS activities, should contribute to improve fund raising in favour of SPS activities.

## **7. Inclusiveness of design and implementation**

The project was initiated by the Ministry in charge of Trade, which was and still is leading the EIF and the WTO accession process. The Ministry of Trade was keen to establish an SPS institutional framework conducive for both processes, and also wanted to see the DTIS recommendations to take shape.

The project proposal was elaborated under an STDF-funded PPG. During the development of the project proposal, key public and private stakeholders were consulted/involved, as detailed in the final PPG report. The project formulation was undertaken under the leadership of the Ministry of Trade, which then involved the Ministry of Agriculture. The initial idea of these two ministries was that one of them should lead the project implementation, but they finally agreed to have an international organization as Implementing Agency.

The consequence of this choice is that the Ministry of Trade, despite being at the initiative of the project, felt somehow side-lined from implementation. This has not favoured its appropriation of the project, and its role in ensuring project durability. The role devoted to the Ministry of Agriculture, which was mostly consultative, did not contribute to its full ownership neither.

Entrusting the lead role to the Implementing Agency was a pragmatic choice that for sure guaranteed an efficient and transparent implementation, and short-term benefits. Entrusting this role to a national institution could have made implementation more challenging but, in the longer term, appropriation and thus sustainability would have probably been higher.

## **F. Lessons learnt.**

Knowledge is one of the two key outcomes of STDF strategy. Because of the specificity of this project compared to other STDF projects (large scope and quasi absence of SPS mechanisms at the beginning), identifying lessons learnt can be of interest for guiding STDF support to countries in similar contexts. There are five questions related to lessons learnt:

### **1. Overall judgement on lessons learnt.**

There are some important lessons to be learnt from this project, both for other development agencies operating in the country, and for STDF: the main one is related to the implementation and leadership of the programme, which influences ownership and sustainability. The other one is the need to carefully consider institutional risks in project design. Those lessons have not been documented and shared so far and this evaluation could be a good opportunity to do so.

Further details on lessons learnt are provided below :

### **2. Lessons learned regarding the process of project design and implementation**

A major lesson of this project regarding design and implementation, relates to the choice of the implementing agency :

Entrusting implementation to an experienced, qualified and well-established development partner (International Organization in this case) has many benefits in the short term: it facilitates communication between the donor and the implementing agency, eases implementation and in particular coordination with other international and national partners. It also secures financial management and associated transfer of funds to National Institutions, since STDF has no specific mechanisms (like UN organizations) to

assess and control fiduciary risks. It has also ensured a very satisfactory delivery of outputs. However, this setup does not favour country ownership and leadership, as well as handover of activities to national counterparts at the end of the project. The balance between a straightforward implementation, but a poor appropriation, and a more challenging implementation that better builds national capacities in the longer term, should therefore be considered for similar projects, taking into accounts both the benefits and costs of each scenario. This is usual dilemma in development activities and there is of course no universal solution. The choice of the implementation setup should be guided by the context of each country. However, considering that STDF funded projects aim at building SPS capacities in the long term, implementation mechanisms based on national institutions could also be considered. This would allow STDF funded projects to be more in line with the Paris Declaration and Accra Action plan principles (in particular with the principles of ownership and alignment). It should also be noted that, including in Comoros where national capacities are considered as limited, other international agencies such as IFAD and the World Bank rely on national institutions for implementation of their projects, which means that it is a possible option.

This lesson doesn't apply to regional projects for which STDF usually entrusts implementation to regional organizations, but to only to National projects where there is a choice to be made between National Institutions and International Organizations.

### **3. Lessons regarding relevance, appropriation and utilization of capacity evaluation tools used:**

Capacity evaluation tools are standard and applicable to all countries; in countries where the SPS system is very rudimentary and where SPS capacities are low, which was the case of Comoros when the tools were applied, they seem overly complex to be entirely relevant and appropriated by the national counterpart. These assessment were for sure a necessary step for developing the action plans, and were part of the initial project design that had been endorsed by the Government, but they were not conducted following a request from the relevant technical institutions, as it is usually the case. It is obvious that a capacity assessment which has been requested by the institution in charge of the sector (e.g. the NPPO), has better chances to be properly internalized.

### **4. Lessons regarding the leverage of public-public and private public partnerships, and trade facilitation linkages**

From the feedback received by the evaluation team by both the private and the public sector, we cannot conclude that the project did stimulate the emergence of any public private partnerships or had an impact on private investments.

The first reason for this is probably the limited participation of the private sector in the project decision making: the representative of traditional cash crop exporters for instance only participated in the first steering committee, and farmers organizations were not involved at all in the steering committee. Another reason is probably that the few representatives of the private sector that were involved in the project activities were all from the supply side (producers, and few exporters). There were no actors from the demand side, in particular buyers and potential importers, which could have been interested in supporting SPS measures in the country. Establishing a flow of vegetable export to Mayotte for instance, would have better chances of success if the importers are associated to the establishment of SPS systems implemented on the ground. On top of this, the private sector in Comoros remains poorly organized and mostly informal, which is a recurrent constraint for all development project which face difficulties to identify and involve legitimate stakeholder organizations in implementation.

This lesson could be useful for other trade-oriented programs in the country, such as the upcoming AFD funded programme.

In terms of public-public partnerships, the main achievement of the project is related to food safety. This is an area where partnership and close collaboration between authorities in charge of public health, trade and agriculture is almost inexistent and would be much needed. The project has made a step forward in that direction by proposing, through the Food Safety Law, the Creation of a food safety Agency. Even if this Agency has not taken shape yet, the framework for its creation exists which is an important step.

Another important achievement in terms of public-public partnerships is related to cooperation with regional bodies, notably COMESA, IOC and AU-IBAR, that will keep providing continuous support to the Government in the SPS domain, both in terms of capacity building and infrastructure investments.

As mentioned earlier, the project could not contribute directly to trade facilitation, because of the non-emergence of the contemplated value chains. However, if these exports were to take place in the future, the institutional systems established with the support of the project would obviously contribute to facilitate them.

## **5. Knowledge management and sharing of good practices**

No major action has been taken yet in that direction, except for the WTO accession process where STDF has deployed some continuous efforts to link the project and national authorities with parties in charge of leading and negotiating the accession.

But it is not too late and the present evaluation could be a very good opportunity to generate knowledge and share good practices. It is therefore suggested to organize a wrap-up workshop at the end of the evaluation process, to share and validate these lessons. Considering the sanitary context in the Country at the time of the evaluation, this could take place partly remotely. In addition to the evaluation report itself, a synthetic policy note could also be produced for dissemination with decision makers who may not have time to read a complete report.

The outcome of the present evaluation should also be shared with the STDF working group to ensure that the main lessons are known and taken into account in the design of future similar STDF projects.

## **6. Long term impact of awareness raising**

Awareness raising on SPS matters is a long-term endeavour which usually starts bearing fruits after years, and translates into changes in practice, better compliance with SPS standards, and sometimes in investments in SPS measures only when other necessary conditions are fulfilled. In resource-poor environments with many competing priorities, even if decision makers at technical levels are convinced of the need for investing in SPS, leveraging funding for SPS issues can remain challenging. This has two main implications: (i) awareness raising should be a continuous activity and should be taken over by other projects, or national institutions after project end, and (ii) awareness raising should also target decision makers at the highest policy and budget making levels, in particular in the Ministry in charge of budget (Ministry of Finance in the case of Comoros), and law makers (members of parliament).

## **7. Lessons learned of importance to the broader donor community**

Another important lesson from this project is that it is not advisable to build a project theory of change based on an over-optimistic outcome, which depends on one risky assumption, especially in a country where the investment context is very volatile. The non-occurrence of this assumption has not prevented the project to deliver its outputs, but outputs have only partially led to the outcome, and the project goal has not been achieved. The project goal could probably have been less ambitious, and less dependent on one assumption, but still very much in line with the STDF strategy (e.g. the project influences catalytic SPS improvements in the country).

On the other hand, some important achievements have been made in areas that are equally important for the country, in particular the domestic sanitary situation and the control of imports, but these aspects were not priorities as per the project document and logframe.

The non-achievement of the goal and outcome indicators do not in our case reflect project failure, but rather a logframe mismatch: the project has achieved all its outputs, and has established an enabling environment, which was what was expected. It can thus be considered as a success from this point of view. However, "on paper" and as per the logframe indicators, it does not appear as a success. This reflects the fact that the selected indicators were not properly reflecting the expectations, but not a project failure.

This lesson could mostly be useful for other projects and development partners in Comoros. Projects are often designed with ambitious targets that do not fully take into account the complexity of the institutional and economic context, and in particular aspects such as the volatile policy environment, or the cost and unpredictability of maritime transport, that in the end often jeopardize the achievements of lower level changes.

## **G. Crosscutting issues**

In the standard evaluation STDF evaluation framework, crosscutting issues are addressed under efficiency. In order to be more specific to each of the two main crosscutting topics (gender and climate change/environment), we have addressed these aspects in a specific section.

### **1. Overall judgement on crosscutting issues**

Generally, the contribution of the project to crosscutting issues, especially gender and environment, can be considered as **marginal**; this can be explained mainly by the fact that these issues were not included in the initial project strategy, and that there were no specific targets or activities on these topics.

This project was designed at a time where those issues were not as high in the development agenda as they are today. For future similar projects, specific indicators and targets pertaining to these aspects should be included: % of youth and women involved in various activities, adoption of measures promoting environmental protection and climate change mitigation/adaptation.

### **2. Women and youth inclusion**

Women and youth inclusion were not explicitly catered for in the project document and there was no specific indicator on women or youth participation in activities in the logframe. However, both issues are high on their agenda of UNDP and all international and national partners, who are aware of the need to take them into account in project activities.

Women were particularly well involved in awareness campaigns, which were implemented by women NGOs, as shown in the outreach figures below:

- Out of the 8,386 pupils targeted in the school awareness campaigns, 4,276 (51%) were girls.
- Majority of the 1,800 market vendors (figure not provided but assumed to be over 50%) were women.

In trainings, participation of women was fair, with an average of 24% of women recorded in the participants list to of 4 trainings<sup>24</sup>.

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<sup>24</sup> Source: list of participants of 4 training sessions (ITA training on trade, training on logframe, national SPS committee workshop and training on SPS agreement)

There was no specific action targeting youth inclusion specifically, despite the importance of this aspect in Comoros, where youth are subject to a very high rate of unemployment (45% for the under 25 years<sup>25</sup>).

### **3. Environmental protection and adaptation to climate change**

As for gender, there was no specific mention of environment in the project design or in the logframe.

However, through some of its activities, the project has contributed to improve environmental protection:

- The phytosanitary law and the regulations on pesticides should contribute to reduce the use of environmentally harmful pesticides, and thus pollution of soils and water.
- The awareness campaigns in markets have targeted the issue of waste management and encouraged the creation of compost pits. Considering the situation of waste collection and management in Comoros, where garbage is often accumulated in the streets, the introduction of this good practice was a key achievement.

### **H. Contribution to higher level objectives**

In addition to the standard OECD evaluation questions, the evaluation also assessed the extent to which the project has contributed to STDF goal and outcomes<sup>26</sup>, and SDGs:

#### **1. Project contribution to STDF goal "increased and sustainable SPS capacity"**

The contribution of the project to the STDF goal is assessed as significant. The project has contributed to build both human capacities and awareness, in a country where SPS issues were very low on the agenda a decade ago. And as mentioned in the sustainability section, these capacities seem pretty durable.

#### **2. Project contribution to STDF Outcome 1: "More synergies and collaboration driving catalytic SPS improvements "**

This is one of the most positive aspects of this project, which has been able with a limited financial volume, to establish an adequate institutional environment that will facilitate private and public investment in export value chains, but also to mobilize additional financing and supports for the SPS activities.

#### **3. Project contribution to STDF Outcome 2: "greater access to, and use of good practices and knowledge products"**

On this aspect, the project contribution has been limited. The project did not have any knowledge management strategy and dedicated resources. Good practices and lessons have not been properly identified, documented, and shared. However, as suggested in the section on lessons learned, the present evaluation could be a good opportunity to valorize the knowledge capital generated by the project.

#### **4. Project contribution to SDGs:**

The SDGs relevant to this project are mostly SDG1 (no poverty), SDG 2 (zero hunger), SDG8 (economic growth) and SDG 17 (partnerships)

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<sup>25</sup> Source UNDP / ILO

<sup>26</sup> as set in the 2020-24 STDF strategy

Partnerships (SDG 17), is an aspect on which the project had a quite positive contribution. Partnerships have been initiated or strengthened on SPS issues at several levels: among international organizations involved in implementation, between IOs and national institutions (e.g. between WHO and MoH), and also between the Country and International Development Partners (e.g. between MoA and JICA for the support to Fisheries sector).

The actual project contribution to SDGs 1, 2 and 8 remains so far indirect and marginal:

- On poverty (SDG1), but also on work and economic growth (SDG 8), the effect of the project are yet to be felt since the main condition for this to happen (exports) have not occurred yet.
- On food security and hunger (SDG2), the contribution of the project is also assessed as marginal. The formulation of a phytosanitary law should contribute to enhance crop productivity hence food security, but some resources would need to be allocated to the plant health services for this to happen, which is not the case yet.

This is understandable considering the nature and scope of the project, and the situation may change in the future if expected spill over effects mentioned earlier happen to occur.



## V. CONCLUSIONS AND RECOMMENDATIONS

Despite the conditions (absence of field mission) in which the evaluation was conducted, most of the project stakeholders could be met and the needed data and information could be collated. Only final beneficiaries such as market vendors and agricultural producers could not be interviewed which mainly affects the assessment of impact of awareness activities, which is thus based on secondary information.

### A. Conclusions

The main conclusions of the evaluation could be summarized as follows:

- Initiating a project that sets the institutional basis of a modern SPS system was a genuine need of Comoros when the project was initiated; capacities and awareness on SPS matters were extremely low, SPS institutional mechanisms were almost inexistent, and the regulatory framework was yet to be developed.
- The project was designed to respond mostly to one issue, which was the facilitation of trade and exports. This was in line with the national strategic priorities at this time, with STDF strategy, and with the main concerns of the Ministry of Trade who was the first project initiator. But it underestimated other important SPS aspects such as sanitary threats related to imports, which were considered the main priorities for the Ministry of Agriculture and were causally related to food security.
- In the end, this did not prevent the project to address these aspects as well: almost all outputs were achieved (capacity building, awareness campaigns, regulations, strategic framework) and contributed to strengthen the national SPS system in all its dimensions, including the domestic ones.
- However, since the project strategy and the logframe (including goal and outcome indicators) were mainly geared toward exports, the project goals and outcome cannot be considered as achieved: they were probably too ambitious and their achievement was conditioned by the occurrence of one major assumption (emergence of new export markets) that did not occur, for reasons that were totally independent from the project influence and broke the whole chain of results. Setting less ambitious objective and goals, less dependent on risks as well, would have been a more reasonable option.
- The project coherence can be considered as very satisfactory: (i) Regarding external coherence, the project interventions complemented the efforts deployed by the Government to reach WTO accession, and to improve compliance with the SPS agreement requirements. They were also fully in line with efforts led by the Government to strengthen exports of agricultural products, even if this did not lead to any concrete achievement in the end. They were as well complementary with supports provided by other development partners (even if these interventions occurred by the end of the Project) to improve compliance, considering that these interventions were mostly focused on production aspects, while project intervention were focusing on institutional ones. In terms of internal coherence, activities were well planned interlinked, and sequenced, which ensured good complementarity and synergies.
- The project efficiency has been very good in the sense that all activities have been implemented as per plans. Major delays were observed however, which were mostly due to the complex implementation setup. The quasi totality of outputs were also achieved, which reflects a very rigorous observation of the project document by the implementing agency (UNDP) and national partners (MoA in particular). The National SPS strategy, which was the main expected output of the project, has been developed and adopted.

- The implementation setup had also some implications on the country ownership, which in turn affected sustainability of actions. Entrusting implementation to an international organization was probably a wise choice in the short term to ensure smooth and efficient implementation of activities, but it also had some negative implications on the project appropriation, and thus on impact and durability.
- The impact on trade and on domestic SPS situation is yet to be concretized, but as per its mission, the project has set the institutional scene and established the required capacities, which was a necessary, but not a sufficient condition. In order to see this impact becoming reality, which is still possible today, other conditions need to be met: the contemplated exports value chains need to be launched, and resources need to be allocated to SPS functions.
- There are good perspectives for both conditions to be fulfilled in a near future, at least partially: fisheries and vegetable export could take shape, and several SPS investments have been or are about to be financed. However, awareness raising of stakeholders that could play a role in this financing (donors and budget makers) still require some efforts.
- The project has played a very significant role in raising awareness on SPS challenges and had a good spill over by contributing to mobilizing additional resources for SPS capacity. Even if these objectives were not really reflected in the logframe, considering that this is an important aspect in the STDF strategy (catalysing and influencing change), this achievement could be considered as a major success.
- Finally, two aspects that would require further strengthening are the sustainability of project activities, and the knowledge management including the documentation and sharing of lessons learnt.

**Even if the project did not achieve the goal and outcome set out in the logframe, the results achieved appear noteworthy and can be directly linked to the project. The project can thus be considered as globally successful and impactful, and the apparent “failure” (on paper, as per logframe) can only be attributed to the inadequacy of the defined goal and outcome, and not to the project approach which achieved most of the objectives usually assigned to STDF funded projects (increased capacities, catalytic effects and knowledge production).**

**The project had a very significant contribution in the creation of an enabling SPS institutional environment, which is a necessary condition for trade to take place, but not sufficient. Another necessary condition for this trade to happen is private investment, but also other aspects such as transport infrastructures and networks, on which the project had no influence. Once these two other conditions will be fulfilled, the impact of the project on trade and on exports in particular could become reality.**

## **B. Recommendations**

The following recommendations can be drawn from these conclusions:

### **1. Recommendations related to post project consolidation, to be implemented in the Country:**

In order to further strengthen the assets that were laid by the project, and that are significant considering the initial situation, it is suggested to address the following aspects:

- This evaluation could be seen as an opportunity to complete some of the unfinished work, in particular on aspects related to sustainability and lessons learnt, that are preventing the project impact to be optimal.
- The outcome of this evaluation could be used by stakeholders (STDF, MoA, MoT) to raise the awareness of the donor community and decision makers in charge of budget making, on the existence of a solid SPS institutional system, and on the need to finance its operations.
- Practically, it is suggested to organize, after the end of this evaluation and once its findings are validated, the following activities:
  - Produce knowledge products: a policy note for decision makers and development partners could summarize the evaluation findings and highlight the benefits of increased investments in the SPS domain. The content of this policy note should be extracted from the evaluation.
  - Organize knowledge sharing events: meetings with the parliamentarians and high-level decision makers in the Ministry of Finance, Prime Minister and President's Office could be held. MoA now organizes regular meetings of donors intervening in the Agricultural sector (sort of donor group meeting but led by the Government). STDF and MoA could make a presentation of the final evaluation findings to this meeting and use this opportunity to advocate with other donors for better financing of the SPS strategy and thematic action plans.
  
- Regarding the support to the adoption of remaining regulatory texts, there is a need for close in-country follow up to ensure that the processes go through and that the investments in formulation of regulations leads to a concrete achievement. FAO and MoA are probably the most appropriate stakeholders to play that role. FAO has been providing a continuous support in this domain to the Ministry over the last decades, through various projects including this one, but also through TCPs, and has a clear comparative advantage on this. Considering that the former MoA National Coordinator is now part of the FAO country office, this task will be made easier.
  
- Refresher courses and initial trainings for newcomers will be needed in a near future to ensure the maintenance of capacities established by the project. Since it would not be possible for STDF to support these trainings, MoA should ensure that they are undertaken with the support of other development partners active in the SPS domain (AFD, FAO, IOC) through their respective projects. This could be agreed upon among development partners during the donor coordination meetings mentioned above, to which STDF should participate.
  
- Optimizing the catalytic effect: The "catalytic effect" contemplated by STDF may require for this project some actions that go beyond the scope of project, both in terms of activities and timing. Some of the institutional capacities and systems established with the support of STDF can be sustained only if they are further supported, either by the beneficiary country, or other development partner. Insufficient public funding to SPS activities is a recurrent problem in developing countries, and there is a need to conduct continuous advocacy and lobbying to improve this financing. This may require a follow up beyond the project closure, which can be a challenge for STDF considering the way it operates. Entrusting this mission to STDF partners, in particular those that have played a significant role in project implementation (such as FAO) could be an option. Dedicating some time to post project follow up by STDF staff is another one.

## **2. General recommendations relevant for STDF**

The lessons from this project that could be of interest for STDF in similar situations, when developing institutional strengthening projects in LDCs, can be summarized as follows:

- **The choice of the implementing agency** for such national project should be carefully considered in light of capacities of institutions to implement the project, but also their mandate and their ability to sustain the project activities. We have seen above that entrusting implementation responsibilities to an International Organization had ensured an efficient and effective implementation, but penalized ownership hence sustainability. Public institutions in countries supported by STDF, especially on LDCs, may not have optimal implementation capacities but learning by doing can be a good way to strengthen them, which is one of the objectives pursued by STDF. In addition, their ability to translate project activities into permanent features and to integrate them in national systems is higher than those of development partners. Several international agencies, notably the World Bank and IFAD, already work this way in Comoros and the mid- and long-term benefits of such an approach are considerable. Considering that establishing strong institutions and systems is an overall long-term goal, this should be an option to consider in the future for national STDF funded projects, including in LDCs.
- **Choice of goals and objectives:** In the design of such projects, especially in countries where the institutional and economic contexts are volatile, the choice of project objectives, but also risks and assumptions should be considered with extreme care. Establishing a theory of change on one outcome depending on one major assumption that has a high likelihood of not occurring, presents a high probability of leading to project failure, at least on paper. Diversification is an excellent risk management strategy, and for such projects and environment, diversification of objectives (e.g. targeting both trade related and domestic SPS aspects) should be considered.
- **The involvement of private sector** in such projects sometimes remains a challenge: in Africa, the private sector can be a bit suspicious about Government led initiatives and reluctant to participate in its activities. In addition, the choice of private sector actors involved projects is not always optimal: In projects where export markets are targeted, it would be essential to involve the demand side, even if they are not in the country, in order to ensure that the systems established in the country meet their expectations. In Comoros, there are some good examples of such partnerships on the ylang-ylang value chain, where foreign importers have supported the local value chain to improve the quality of the product. Establishing a flow of export to Mayotte for instance will only be feasible if such an arrangement is found, and if importers are involved in establishing the SPS mechanisms.
- **Optimizing the catalytic effect:** The “catalytic effect” contemplated by STDF may require some actions that go beyond the scope of project, both in terms of activities and timing. Some of the institutional capacities and systems established with the support of STDF can be sustained only if they are further supported, either by the beneficiary country, or other development partner. Insufficient public funding to SPS activities is a recurrent problem in developing countries, and there is a need to conduct continuous advocacy and lobbying to improve this financing. This may require a follow up beyond the project closure, which can be a challenge for STDF considering the way it operates. Entrusting this mission to STDF partners, in particular those that have played a significant role in project implementation –(such as FAO) could be an option. Dedicating some time to post project follow up by STDF staff is another one.

## **ANNEXES**

Annex I: Attainment of goal, outcome and output indicators

Annex II: implementation of activities – compliance with logframe, workplan and budget.

Annex III: Occurrence of risks and assumptions related to activities

Annex IV: Evaluation matrix

Annex V: Evaluation questions

Annex VI: List of people met

Annex I: Attainment of goal, outcome and output indicators

|         | <b>Objectives/results</b>   | <b>Indicator and target</b>   | <b>Attainment of target</b> | <b>Comment/explanation</b>   |
|---------|---|---|-----------------------------|--|
| Goal    | Contribution to improving farmers' incomes  | At least 100 producers are in the process of exporting products subject to SPS requirements.              | Not attained                | <p>According to the exporters met during the evaluation, the producers accessing to export market are the same as before the project (vanilla, ylang and clover). Although this was not tracked by project M&amp;E, the evaluation could not identify any new export flow taking place since the project design. Due to the occurrence of risks (see below) and no occurrence of assumption related to the emergence of 2 new export market (fish and vegetables to Mayotte), the partial achievement of outcomes has not led to the attainment of the goal.</p> <p>It should however be noted that the non attainment of this LF target does not mean that the project objectives are not achieved, but rather that the indicators were not well chosen (see comment on this in the text)</p> |
| Outcome | The national SPS system is able to support the country's agricultural export development strategies | At least 2 requests for access to markets for agricultural products of plant origin are being negotiated; | Not attained                | Same as above; attainment of target was prevented by occurrence of risk and no occurrence of assumption related to the emergence of 2 new export market  |
|         |   | Evaluation mission of "National Food and Veterinary Office" conducted                                     | Partially attained          | There is no clearly defined "National Food and Veterinary Office" in Comoros and its competencies are disputed between INRAPE and the Directorate in charge of Agriculture and Livestock. However, an assessment of the food safety institutional system was undertaken by FAO (see below), and a PVS analysis was undertaken by OIE for the veterinary part.  |

|         |   |   |                               |  |
|---------|---|---|-------------------------------|--|
|         |   |   |                               | In addition, this indicator could be rather considered as an output indicator and is redundant with output indicators mentioned below.   |
|         |   | SPS issues are adequately addressed in all projects/programs supporting agricultural export chains developed during the first two years of the project's life.                                      | Attained                      | This target is attained, since all projects supporting the agricultural sector now incorporate SPS related support. However, as for all outcome indicators, this achievement cannot be attributed to this project only and other projects and initiatives may have contributed too.  |
|         |   | 90% of export support structures (chamber of commerce, professional associations) are able to correctly identify the institutional interlocutor with authority over SPS issues for a given product. | Partially attained            | Only export oriented value chain actors are able to do so. Generalist farmers organizations are not able, and do not even need to do so, since they are not involved in export.<br><br>The confusion over the role of national institutions (INRAPE, NPPV, Veterinary services, decentralized public services), which has not been addressed by the project, is an additional impediment.  |
| Outputs | Sub-sectoral institutional capacities (plant protection, food safety, laboratories) are precisely known and the strengthening needs identified and brought to the attention of all stakeholders in each of the subsectors in question | A diagnostic report for each of the three sub-sectors containing detailed recommendations submitted to the relevant institution   | Attained (and even surpassed) | 6 diagnostic assessments were conducted: <ul style="list-style-type: none"> <li>- IPPC Phytosanitary Capacity Evaluation</li> <li>- FAO - Assessment of laboratory analysis services - Nov 2014</li> <li>- FAO - Assessment of the food safety system - July 2015</li> <li>- FAO - Diagnostic de la sécurité sanitaire au niveau du secteur des pêches - July 2015 (same report as above)</li> <li>- FAO - Report on the state of play of legislation and regulations on health and plant health -</li> <li>- OIE : PVS (Oct 2013), legislation mission (2014) and Gap Analysis (2016). Was</li> </ul> |

|  |   |   |                    |   |
|--|---|---|--------------------|---|
|  |   |   |                    | <p>conducted out of the scope of the project but in collaboration and contributed to the achievement of project outcomes.</p> <p>All 6 assessment reports were validated in stakeholder workshops and submitted to the relevant institution.</p>  |
|  | Operational action plans based on the results of sub-sectoral diagnostics are adopted and priorities are set for ongoing agricultural export promotion programmes | Three operational plans developed and adopted on time.  | Attained           | <p>3 operational plans were developed:</p> <ul style="list-style-type: none"> <li>- Fisheries road map (developed with support from FAO)</li> <li>- Food safety road map (with support from FAO)</li> <li>- Phytosanitary roadmap (part of ECP)</li> </ul> <p>All 3 action plans were adopted during final stakeholder validation workshops.</p>  |
|  | A national strategy for the implementation of SPS measures in the country is adopted by the Government and welcomed by all public and private stakeholders        | Strategy document endorsed by the Government  | Attained           | This was the main expected output of the project and it has been delivered by the end of the project, validated with stakeholders, and adopted officially by Council of Ministers.  |
|  | The conditions for adherence to the development, adoption and implementation of the national SPS strategy and the resulting action plans are promoted             | All stakeholders (public sector, private operators, donors) are kept informed of the evolution of the national SPS strategy and are in favour of its development and implementation | Partially attained | <p>All governmental actors and public institutions are aware of the existence of the strategy, but majority of private sector actors (farmers organizations in particular) are not. However, all actors are in favor of an implementation of the main measures contained in the strategy.</p> <p>The choice of this indicator can also be questioned, since it only reflects the awareness of stakeholders on the SPS strategy, while the purpose of the set of activities under output 3</p> |



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|--|--|--|--|---|
|  |  |  |  | was very much focused on capacity building, which is not reflected by this indicator. |
|--|--|--|--|---|

Annex II: implementation of activities – compliance with logframe, workplan and budget.

| Activities  | Indicators  | Comment  |
|---|---|--|
| Conducting the Phytosanitary Capacity Assessment (PCE)  | PCE conducted   | <b>Fully implemented – delayed</b><br>The PCE has been conducted during semester 3 (S3) and validated during S5 while it was initially planned for S2.   |
| Conduct an institutional food safety assessment using the FAO tool and taking into account previous field studies                                     | The study is carried out  | <b>Fully implemented - delayed</b><br>The evaluation was conducted and validated during S4 (one year behind schedule), in collaboration with FAO TCP Codex project, and forwarded to the competent authority during S5.  |
| Assess the progress in establishing a national fisheries authority  | The study is carried out  | <b>Fully implemented - delayed</b><br>The evaluation was conducted by FAO during S4 (one year behind schedule) together with the Food Safety Evaluation;   |
| Conduct a very precise diagnosis of analysis capacities   | L'étude est réalisée  | <b>Fully implemented - delayed</b><br>The evaluation was conducted by FAO during S4 (one year behind schedule) together with the Food Safety Evaluation, and draft regulations control, certification of fish and fisheries products have been developed. The report was validated by stakeholders during S5.  |
| Organize sub-sector workshops to provide diagnostic results and expert recommendations and develop and adopt operational action plans for each sector | Seven national workshops are carried out  | <b>Fully implemented - partly on time</b> For each of the 4 action plans, 2 or 3 national workshops were organized, including one at the end of the process for validation.  |
| Finalize sub-sector action plans and ensure their adoption by the highest authority within each of the sub-sectors                                    | At least 3 of the short-term priority actions are integrated into the annual work plans of the competent structures and the necessary resources are allocated to them | <b>Fully implemented - mostly delayed</b><br>All 4 action plans have been developed and validated, some on time, mostly with some delays:<br><ul style="list-style-type: none"> <li>- The phytosanitary action plan has been developed and validated during S3 (on time)</li> <li>- The Food safety action plan has been finalized during S5 (1 year and half behind schedule) and validated during S6 (2 years behind schedule)</li> <li>- The fisheries action plan has been developed and forwarded to the competent authority during S5 (1 year and half behind schedule) and adopted during S7 (2 years behind schedule)</li> </ul> |

|   |   |  |
|---|---|--|
|   |   | <ul style="list-style-type: none"> <li>- The laboratory action plan has been developed and approved during S9 (3 years behind schedule)</li> </ul> <p>However, if the activity has been implemented as per the plans, the indicator for this activity doesn't seem to be entirely attained at the end of the project. If SPS matters are now integrated in the NAIP, resources to finance their implementation are yet to be sourced, both from donors and from the Government.</p>  |
| <p>Conduct awareness-raising activities for the general public, economic operators and associations and other professional organizations:</p> <ol style="list-style-type: none"> <li>1. Media campaign (TV and radio sketches)</li> <li>2. Group awareness campaigns (focus group, flyers, role-playing, etc.)</li> <li>3. Thematic workshops for producers' associations, consumers, NGOs etc. other support structures</li> </ol> | <p>At least 50% of farmers/operators/consumers/NGOs correctly respond to a questionnaire on the themes of awareness-raising</p> | <p><b>Fully implemented - mostly delayed – within budget</b></p> <ul style="list-style-type: none"> <li>- The awareness strategy has been developed by the Ministry of Health and WHO during S2 (on time)</li> <li>- The communication material has been developed and the implementing NGOs contracted during S3</li> <li>- The first phase of the awareness campaign has been implemented during S4 (6 months behind schedule)</li> <li>- The second phase of the awareness campaign has been implemented during S6 (2 years behind schedule)</li> <li>- The third phase of the awareness campaign has been implemented during S8 (18 months behind schedule)</li> </ul> <p>An additional support not planned for in the project document, but approved by the Steering Committee, has been provided in the scope of this activity: 60 cool boxes have been distributed to fish sellers to allow them to implement the recommended hygiene measures.</p> <p>As above, if implementation reports show that this activity has been implemented as per the plans, despite the delays, there is no evidence that the indicator for this activity has been attained, in the absence of post campaign assessment. On top of this, this indicator could rather be considered as an outcome indicator.</p> <p>The whole set of awareness activities has been implemented within the budget (USD 229,000 spent out of a total budget of USD 231,120).</p> |
| <p>Organize training sessions for executives to raise awareness of their role in supporting economic operators in</p>   | <p>90% of trained managers respond correctly to a questionnaire</p>   | <p><b>Fully implemented - mostly delayed</b></p> <p>All the planned trainings have taken place but some with delays:</p> <ul style="list-style-type: none"> <li>- Two training sessions on market access have been organized by ITC during S2</li> </ul>   |

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| <p>implementing SPS export requirements</p> <ul style="list-style-type: none"> <li>- Training on the SPS Agreement and the Three Sisters and on SPS Information Systems</li> <li>- Training on market access negotiation procedures</li> </ul>   | <p>work on the SPS system</p>  | <p>(on time) and S5 for fisheries products (not initially planned for)</p> <ul style="list-style-type: none"> <li>- Two training sessions on SPS agreement and 3 sisters have been organized during S2 (ahead of schedule time) and S7</li> </ul> <p>As for the above, although some evaluations were conducted after these workshops, they do not allow to assess if the indicator, which is actually an outcome indicator, is attained.</p>   |
| <p>Analyze and update key pieces of legislation to clearly define the responsibilities, mandates, and responsibilities of each SPS institution in the development and future implementation of the SPS strategy.</p> <p>Organize a workshop to present the results of the state of the situation and decide on a set of five priority texts to be updated</p> <p>Prepare drafts of the five priority texts</p> <p>Organize a workshop to present, amend and validate the five priority texts before submitting them for adoption</p> | <p>A legal analysis report containing recommendations is submitted to the relevant SPS institutions</p> <p>Five draft texts deemed to be priorities are validated by the frameworks of SPS institutions and submitted for adoption</p> | <p><b>Fully implemented - mostly delayed</b> The analysis of SPS regulatory framework has been conducted during S3 (on time) by FAO and the report has been validated during S4</p> <ul style="list-style-type: none"> <li>- Nine draft regulations (7 on certification of fisheries products, 1 phytosanitary law, 1 law on phytosanitary products management) have been developed by FAO during S3 (on time)</li> <li>- A presidential decree establishing the National Office for Quality Control and Certification of Fishing Products has been developed and adopted during S8</li> <li>- A draft presidential decree establishing the National Codex Committee has been developed</li> <li>- A draft decision establishing a National Food Safety Committee has been developed.</li> </ul> <p>As mentioned in para 2 of the effectiveness section, some of the laws and regulations were adopted, others were not; some laws were adopted but cannot be enforced in the absence of related regulations.</p> <p>However, the target for this activity, which was to develop 5 draft regulations, has been surpassed.</p> |
| <p>Training of representatives of key institutions to the logical framework approach and basic concepts of monitoring and evaluation of programs and projects</p>  | <p>At least one program developed during the year following the training using the planning tools taught</p>   | <p><b>Fully implemented</b></p> <p>Thirty executives from public, private and civil society institutions received training on the fundamental elements of project/program design, formulation, development, and monitoring, during S5</p>   |
| <p>Establish a framework for coordination and information sharing among SPS stakeholders</p>   | <p>The number of visits to the website increases steadily over the year</p>  | <p><b>Not implemented as per initial plans</b></p> <p>The initial idea for this activity was to establish a web based SPS information system. An attempt to design the structure of the website has been made, but without any further implementation. The feasibility</p>  |

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| <ul style="list-style-type: none"> <li>- Create the website to bring together all SPS information</li> <li>- Identify and analyse the role of stakeholders in disseminating information</li> <li>- Collecting information</li> <li>- Establish a model/procedures for disseminating information</li> <li>- Website presentation workshop and validation</li> </ul> | <p>following its launch</p> <p>The website contains at least 1000 SPS documents</p> | <p>of this activity can actually be questioned in a country where access to electricity, and thus to information technologies, remains a major challenge.</p> <p>Instead, the project attempted to establish a National SPS coordination committee, that could play a similar role, but in a more traditional way. This setup was promoted by AU-IBAR in all African Countries in the scope of PANSPSO project (implemented in partnership with STDF). However, like in most of the countries where this was initiated, the sustainability of this committee has been an issue and it has never met after the initial workshop.</p> |
| <p>Synthesize sub-sectoral action plans to identify a consolidated SPS action plan with strategic directions for for trade development and poverty reduction</p>   | <p>Strategy document adopted</p>  | <p><b>Fully implemented - delayed</b></p> <p>This activity has been implemented but with major delays mostly due to the mobilization of FAO expertise. The consultant has been recruited during S8 only, and strategy finalized in November 2017, during the very last months of the project.</p>   |
| <p>Organize three national workshops (one at start-up, one at the halfway point and one at the end of the project) bringing together public and private institutions as well as donors to encourage full support for the SPS strategy</p>  | <p>Number of key institutions present at the three workshops</p>                    | <p><b>Fully implemented – partly delayed</b></p> <p>All three national workshops were organized as per the plans, although with significant delays for N° 2 and N°3.</p>  |

Annex III: Occurrence of risks and assumptions related to activities

| Assumptions linked to activities (as per the logframe)   | Comment on occurrence  |
|--|--|
| There are enough documents and "institutional memory" to be able to conduct the ECP in good conditions                                     | <b>No information</b>  |
| The commitment of the authorities to suspend the ongoing institutional reorganization following the food law to freeze the basic situation | <b>Occurred</b><br>There was no institutional reshuffle on food safety during the project implementation period  |
| Media engagement   | <b>Occurred</b><br>Medias were ready to participate in the awareness campaigns   |
| Lack of campaigns competing with media availability and risking disrupting the calendar  | <b>Occurred</b><br>This constraint was not mentioned by WHO, Ministry of Health or implementing NGOs   |
| Producer associations have a minimum capacity to absorb trainings  | <b>Did not occur</b><br>Farmers organizations have low capacities, inadequate representativity, and are highly politicized, which hinders their absorption capacity.   |
| Destination markets for SPS risk products identified   | <b>Did not occur</b><br>This was a major assumption that affected also the achievement of outcomes, objectives and goal, and that did not occur as mentioned in section on efficiency.   |
| The process of adopting/signing revised draft texts is diligent  | <b>Did not occur</b><br>As mentioned in the section on efficiency, the political uptake has not been adequate, and this has led to an uncomplete or late adoption of draft texts.  |
| No power struggle or partisan considerations hinder the legislative amendment process  | <b>Did not occur</b><br>As it could be expected, the conflict of interest between institutions under MAPE over sanitary inspection, which generates substantial resources in a country where public allocation to ministerial departments is low, has hampered the roll out of reforms, especially those aiming at establishing a food safety authority. |
| The authorities give trained executives leadership in  | <b>Partially occurred</b><br>The technical officers had sufficient delegation of power to implement the action plans but did not receive any   |

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| the implementation of their institution's action plans  | substantial resource from the government and had to rely on donor support   |
| Officers dedicated to monitoring and evaluating the implementation of the strategy are appointed within each of the SPS institutions      | <b>Did not occur</b><br>No systematic monitoring of the strategy and action plans has been put in place   |
| Donor calls for projects are managed in a concerted manner and trained individuals are involved   | <b>Partially occurred</b><br>Some opportunities for donor support to the SPS sector (IOC, JICA) were shared with stakeholders and led to the financing of some activities included in the strategy/action plan.   |
| WTO accession could encourage institutions to make use of coordination procedures established in order to fulfil transparency obligations | <b>Occurred</b><br>The WTO accession process, associated with some requirements for the country to have a proper SPS institutional framework, created a strong political momentum that helped in mobilizing high level decision makers and in overtaking some of the institutional constraints.   |
| Easier internet access  | <b>Did not occur</b><br>Despite the development of the mobile network and the wider use of smartphones, internet access remains a major issue, including because of poor electricity supply. The non-occurrence of this assumption is one of the reasons why the digital information platform could not be established.                             |
| Commitment from the various institutions to keep the website up to date   | <b>Did not occur / not relevant</b><br>The website was never established  |
| Government commitment to allocate a growing budget to the sector  | <b>Partially occurred</b><br>The willingness of the government to allocate more resources to the SPS sector is real. It is reflected in the recent NAIP where a total budget of USD 4 M (out of a total of USD 130M, over 5 years), is allocated to SPS related activities. However, the resources to finance these investments are not sufficient. |
| Ability of stakeholders to propose partnerships and innovative mechanisms to fund SPS activities  | <b>Partially occurred</b><br>So far, no innovative mechanism such as PPP has been able to finance SPS activities, but some ideas have emerged (in the fisheries sector, and for vegetables exports to Mayotte, with aggregators supporting compliance with SPS measures at grassroot production level) that are yet to be concretized.              |

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| Favourable conditions and incentives for agricultural exports | <b>Did not occur</b><br>The contemplated investments in fisheries and vegetable value chains, that were expected to drive exports, have not taken place as mentioned in the efficiency section. |
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## Annex IV: Evaluation Matrix

| <b>Evaluation question</b>  | <b>Evidence/indicators</b>  | <b>Information source &amp; method</b>   |
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| <b>Relevance</b>  |   |  |
| 1. Was the project the right answer to the SPS related needs of the beneficiary? (i) at the time of the design, and (ii) during implementation if circumstances have changed          | <ul style="list-style-type: none"> <li>- domestic (intra and interisland) and regional trade context</li> <li>- export potential and constraints</li> <li>- food safety, animal and plant health contexts</li> <li>- alignment with national policies and strategies</li> <li>- capacities (incl. gaps) of stakeholders and institutions</li> </ul> | <ul style="list-style-type: none"> <li>- Project design document</li> <li>- Interviews with resource persons (Min. of Economy and Trade; stakeholders)</li> <li>- Sector analysis and studies</li> <li>- National and regional policies and strategies</li> <li>- SPS assessments (produced by project)</li> </ul> |
| 2. What was the value added of this project, compared to other support programs?  | <ul style="list-style-type: none"> <li>- existence and content/approach of past and current SPS programs at regional /national level (at time of design, during implementation and currently)</li> <li>- actual synergies and collaboration during implementation</li> </ul>  | <ul style="list-style-type: none"> <li>- interviews with other development partners</li> <li>- project documents</li> <li>- Activity reports of project and partners</li> </ul>  |
| 3. Were local contexts, ownership, processes and stakeholders adequately taken into account in the design and implementation of the project?  | <ul style="list-style-type: none"> <li>- Consultation of stakeholders during design</li> <li>- Consultation of stakeholders during implementation</li> <li>- Alignment with local institutional processes (e.g. policy processes)</li> <li>- Involvement of national institutions in implementation of activities</li> </ul>                        | <ul style="list-style-type: none"> <li>- Steering committee minutes</li> <li>- Workshop reports</li> <li>- Interviews with stakeholders</li> </ul>   |
| <b>Effectiveness</b>  |   |  |
| <b>Evaluation question</b>  | <b>Evidence/indicators</b>  | <b>Information source &amp; method</b>   |
| 1. To what extent were the project objectives achieved or are likely to be achieved (based on the indicators for expected outputs and outcomes identified in the project's logframe)? | <ul style="list-style-type: none"> <li>- Logframe indicators to be compared to:</li> <li>- achievements as per reports for output indicators</li> <li>- trade data for quantified outcome indicators</li> </ul>   | <ul style="list-style-type: none"> <li>- project reports</li> <li>- trade statistics (customs, inspection and certification body - INRAPE)</li> <li>- Interviews with resource persons and stakeholders</li> </ul>   |

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|   | - opinion of resource persons for qualitative indicators  |  |
| 2. What were the major factors, including occurrence of risks and assumptions, influencing the achievement or non-achievement of the project objectives, outcomes and outputs?  | - Policy measures<br>- Participation of stakeholders<br>- Political and institutional context (including in particular institutional reforms)<br>- Economic context   | - project reports<br>- Interviews with resource persons and stakeholders   |
| 3. UNDP, as the implementing agency, signed the contract with WTO and later signed MoU with other international partners. Did this set-up contribute to the achievement of the project's objectives? Did the international partner add value to the project implementation? What worked well in this alliance and what not so well? What would be the recommendations for the future? | - Implementation delays due to administrative issues<br>- Implementation difficulties (overlapping of activities, confusion of stakeholders) or successes (synergies, clear segregation of duties based on mandates and comparative advantages) | - MoUs between UNDP and international partners<br>- Project reports<br>- SC minutes<br>- Interview with implementing agency, international & national partners |
| 4. To what extent were horizontal issues (particularly related to gender and environment) adequately addressed in the project?  | This question is addressed in a specific section below  | -  |
| 5. How effective were the methods used for training of stakeholders and raise public awareness? Did the training build the requisite skills? Were the training materials and methods adequate?  | - Training materials and approaches<br>- Awareness campaign materials<br>- Perception of training and awareness campaigns beneficiaries   | - Workshop reports<br>- Training and awareness packages<br>- Interview with beneficiaries<br>- Interview with trainers   |
| <b>Efficiency</b>   |   |  |
| 1. Were the activities and outputs delivered according to the project document (i.e. on time and  | - Conformity of implementation to initial schedule  | - Project document and initial implementation schedule<br>- Successive work plans  |

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| within the budget)? If not, what were the reasons behind the delays. Was it beyond or within the control of the project?   | <ul style="list-style-type: none"> <li>- Conformity of implementation to workplans</li> <li>- Conformity of workplans to initial schedule</li> </ul>  | <ul style="list-style-type: none"> <li>- Implementation reports</li> <li>- Requests for extension</li> </ul>  |
| 2. How strong and realistic was the risk matrix in the project document?   | <ul style="list-style-type: none"> <li>- Risk matrix</li> <li>- Occurrence of risks</li> <li>- Changes in context (policy, institutions, trade, other projects)</li> </ul>  | <ul style="list-style-type: none"> <li>- Project design document</li> <li>- Interview with project team and stakeholders</li> </ul>   |
| 3. What changes and risks, if any, occurred during project implementation, and how was the project able to adapt to these changes and manage risks?  | <ul style="list-style-type: none"> <li>- Occurrence of risks</li> <li>- Changes in context (policy, institutions, trade, other projects)</li> <li>- Mitigation measures taken to address occurring risks and changes in context</li> </ul>  | <ul style="list-style-type: none"> <li>- Project reports</li> <li>- Interview with project team and stakeholders</li> </ul>   |
| 4. Were the assumptions mentioned in the risk matrix sound and realistic? Did they hold?   | <ul style="list-style-type: none"> <li>- Concretization of assumptions (on institutional context, on emergence of markets, on public and private investments)</li> </ul>  | <ul style="list-style-type: none"> <li>- Project reports</li> <li>- Interview with project team and stakeholders</li> </ul>   |
| 5. Was the project a cost-effective contribution to addressing the needs of the beneficiary?   | <ul style="list-style-type: none"> <li>- Costs per beneficiary</li> <li>- Costs per unit of outputs and activities)</li> <li>- Trade benefits (diminution in rejections, added value on products, increased volumes of trade)</li> </ul>  | <ul style="list-style-type: none"> <li>- Financial reports</li> <li>- Trade data</li> <li>- Interview with development partners</li> </ul>  |
| 6. Was the project able to initiate, stimulate and leverage partnerships that have generated spill over effects and synergetic benefits?   | <ul style="list-style-type: none"> <li>- Impact on partnerships (public-public, private-public)</li> <li>- Spillover effects on other projects, government activities, private sector investments</li> </ul>  | <ul style="list-style-type: none"> <li>- Project reports</li> <li>- Interview with development partners</li> <li>- Interviews with stakeholders</li> </ul>  |
| <b>Impact</b>  |   |   |
| 1. To what extent did the project contribute to higher level objectives of the STDF programme such as a measurable impact on market access, improved domestic SPS situation, and/or poverty reduction? | <ul style="list-style-type: none"> <li>- Export volumes</li> <li>- Export rejections</li> <li>- Import inspections</li> <li>- Emergence of new export markets where SPS aspects play a critical role (e.g. fisheries, vegetables export towards Mayotte)</li> <li>- Benefits for livelihoods of rural population</li> </ul> | <ul style="list-style-type: none"> <li>- Trade statistics (customs)</li> <li>- Inspection data (export and import, from INRAPE)</li> <li>- Interviews with exporters (agricultural products, fish) and producers</li> </ul> |

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| <p>2. What real difference (expected and/or unexpected) has the project made or is likely to have on the final beneficiaries?</p>   | <ul style="list-style-type: none"> <li>- Changes in nutrition practices (food safety aspects) of households</li> <li>- Improvement in public health, plant health and animal health status</li> <li>- Increased incomes due to better market access</li> </ul>                                    | <ul style="list-style-type: none"> <li>- Public health (occurrence of food borne diseases), plant health and animal health statistics</li> <li>- Interview with producers</li> <li>- Report of food safety awareness campaigns</li> </ul>   |
| <p>3. What was the role of the project, if any, in raising awareness on SPS challenges and/or mobilizing additional resources for SPS capacity?</p>   | <ul style="list-style-type: none"> <li>- Increased financing of SPS issues (donors and government)</li> <li>- Strengthened inspection and controls</li> <li>- Level of awareness of consumers</li> </ul>  | <ul style="list-style-type: none"> <li>- Review of public expenditure (document produced by FAO in 2020)</li> <li>- Interview with development partners</li> <li>- Public health (occurrence of food borne diseases), plant health and animal health statistics</li> <li>- Inspection data</li> </ul> |
| <p>4. To which extent did the project contribute to enhance the participation of Comoros (public and private sector) in the standard setting process (OIE, IPPC, Codex) and activities of the WTO SPS committee</p> | <ul style="list-style-type: none"> <li>- Effective participation of national representatives in 3 sisters' meetings</li> <li>- National consultations on standard setting process (preparation to global meetings)</li> </ul>   | <ul style="list-style-type: none"> <li>- Minutes of OIE, IPPC, Codex and WTO-STDF meetings</li> <li>- AU-IBAR reports (monitoring of participation of African Nations in standard setting process undertaken under PANSPSO project)</li> <li>- Minutes of National SPS committee</li> </ul>           |
| <p>5. To which extent did the project contribute to the country's WTO accession process?</p>  | <ul style="list-style-type: none"> <li>- Progress in accession process</li> <li>- Participation in WTO activities</li> </ul>  | <ul style="list-style-type: none"> <li>- Interviews with stakeholders</li> <li>- WTO meeting minutes</li> <li>- Country WTO accession status</li> </ul>   |
| <b>Sustainability</b>   |   |   |
| <p>1. To what extent do the benefits of the project continue after the end of STDF funding?</p>   | <ul style="list-style-type: none"> <li>- Increased public financing of SPS issues after project</li> <li>- Continuation of activities by beneficiaries, on their own resources</li> <li>- Adoption and implementation of policy and regulatory frameworks developed during the project</li> </ul> | <ul style="list-style-type: none"> <li>- Review of public expenditure (FAO)</li> <li>- Interviews with development partners</li> <li>- Interviews with public institutions involved in project implementation</li> </ul>  |
| <p>2. Do the recipients of the project have the necessary capacity to sustain the results?</p>  | <ul style="list-style-type: none"> <li>- Budgets allocated to SPS activities by public institutions, private sector organizations</li> <li>- Awareness and understanding of SPS</li> </ul>  | <ul style="list-style-type: none"> <li>- Review of public expenditure (FAO)</li> <li>- Interviews with public institutions involved in project implementation</li> </ul>  |

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|  | issues by project beneficiaries  | - Interviews with project beneficiaries (all categories)   |
| 3. What follow-up activities, if any, are planned and/or required to sustain these results over time?  | - Existing follow up activities conducted by implementing partners, public institutions, or other development partners   | - Interviews with implementing partners, public institutions, or other development partners  |
| 4. What are the major factors which influenced sustainability of the project?  | - Measures taken by project to ensure sustainability<br>- External factors, beyond project control, that supported or jeopardized sustainability   | - Interviews with resource persons and project beneficiaries<br>- Project reports  |
| 5. Was sustainability (including follow-up activities, scaling up and dissemination of results) adequately considered at the project design phase and throughout the project?                        | - Sustainability aspects included in project design, or in successive workplans<br>- Existence of project exit strategy<br>- Measures taken by project to ensure sustainability  | - Project design document<br>- Work plans<br>- Exit strategy (if exists)<br>- Interviews with UNDP and implementing partners                                 |
| 6. To which extent was the design and implementation inclusive enough to take into account capacities and willingness of stakeholders to ensure durability of project activities and outcomes?       | - Stakeholder consultation on post project sustainability<br>- Existence of project exit strategy<br>- Measures taken by project to ensure sustainability  | - Interviews with resource persons and project beneficiaries<br>- Project reports<br>- Minutes of SC<br>- Minutes of consultation meetings with stakeholders |
| <b>Lessons learnt</b>  |  |  |
| 1. What lessons can be learned from the project regarding the process of project design and implementation?  | - Challenges in implementation<br>- Successes in implementation  | - Project reports<br>- Steering committee minutes<br>- Interviews with implementing partners and beneficiaries   |
| 2. What lessons can be learned regarding:<br>a. The relevance, appropriation and utilization of capacity evaluation tools used;<br>b. The leverage of public-public and private public partnerships. | - Participation of stakeholders in evaluation exercises<br>- Measures taken in line with evaluation findings and recommendations<br>- Direct or indirect contribution of project to partnership building (public-public or private-public) established<br>- Direct or indirect contribution of project to trade facilitation | - Project reports<br>- Interviews with implementing partners, beneficiaries and resource persons<br>- Trade statistics                                       |

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| c. The trade facilitation linkages facilitated by the project.   |  |   |
| 3. What lessons can be learned from the project, which may be of importance to the broader donor community and which should be disseminated more widely?   | <ul style="list-style-type: none"> <li>- Success stories</li> <li>- Best practices</li> <li>- Implementation challenges</li> <li>- Project efficiency, effectiveness, impact, sustainability (from respective sections)</li> </ul> | <ul style="list-style-type: none"> <li>- Project reports</li> <li>- Internal evaluation</li> <li>- Evaluation of efficiency, effectiveness, impact, sustainability</li> </ul> |
| 4. At which level and for which situation could these lessons learnt be useful and applicable?   | <ul style="list-style-type: none"> <li>- Lessons learned (from above)</li> <li>- SPS context in the country, region, other developing countries</li> </ul>   | <ul style="list-style-type: none"> <li>- Expert's knowledge on SPS situation in the region</li> </ul>   |
| 5. What actions have been taken by the beneficiary, STDF partnership or others to document, disseminate, learn and follow-up on the outcomes of the project? How could STDF increase the sharing of good practice on SPS capacity building coming out of this project? | <ul style="list-style-type: none"> <li>- Documentation of lessons learned</li> <li>- Awareness of stakeholders and partners on project outcomes</li> </ul>   | <ul style="list-style-type: none"> <li>- Project reports</li> <li>- Communication material</li> <li>- Interviews with stakeholders and partners</li> </ul>                    |
| <b>Crosscutting issues</b>   |  |   |
| 1. To what extent were horizontal issues (particularly related to gender and environment) adequately addressed in the project?   | This question is addressed in 4 more specific section below  |   |
| 2. To what extent was women inclusion adequately addressed in project activities?  | <ul style="list-style-type: none"> <li>- Participation of women in project implementation</li> <li>- % of women among beneficiaries</li> </ul>   | <ul style="list-style-type: none"> <li>- Meeting minutes</li> <li>- Workshop reports</li> <li>- Activity reports</li> </ul>   |
| 3. To what extent was youth inclusion adequately addressed in project activities?  | <ul style="list-style-type: none"> <li>- % of youth among beneficiaries</li> </ul>   | <ul style="list-style-type: none"> <li>- Interviews with beneficiaries (meeting reports and minutes may not provide information on this aspect)</li> </ul>                    |
| 4. To what extent was environmental protection adequately addressed in the project   | <ul style="list-style-type: none"> <li>- Existence of activities contributing to environmental protection (e.g. promotion of</li> </ul>  | <ul style="list-style-type: none"> <li>- Project reports</li> <li>- Interview with implementing agencies (INRAPE)</li> </ul>  |

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|  | sustainable plant protection practices)   |  |
| 5. Was adaptation to climate change adequately addressed in project activities   | - Existence of activities contributing to CC adaptation (e.g. surveillance of climate sensitive diseases) | - Project reports<br>- Interview with implementing agencies (INRAPE) |
| <b>Contribution to higher level objectives</b>   |   |  |
| <p>Contribution to STDF goal and outcomes (as set in the 2020-24 STDF strategy):</p> <ul style="list-style-type: none"> <li>○ Goal: "increased and sustainable SPS capacity "</li> <li>○ Outcome 1: "More synergies and collaboration driving catalytic SPS improvements "</li> <li>○ Outcome 2: "greater access to, and use of good practices and knowledge products "</li> </ul> |   |  |
| Contribution to SDG 1 (no poverty), 2(zero hunger), 3 (Good health), 8 (work and economic growth) and 17 (partnerships)  |   |  |

## Annex V: Evaluation questions

### Implementing agency and associated international partners

#### **General questions**

- Quelle a été votre implication/rôle dans la mise en œuvre du projet STDF
- D'une manière générale, comment s'est passé votre implication dans le projet ?

#### **Questions related to relevance**

- Quels sont les principaux problèmes rencontrés par les Comores dans le domaine SPS ?
- Est-ce que le projet STDF répondait aux besoins prioritaires du secteur agricole dans le domaine SPS ? au démarrage ? en cours de mise en œuvre si les circonstances ont changé ?
- Quelle était selon vous la valeur ajoutée du projet par rapport à d'autres projets SPS ?
- A votre connaissance, est-ce que la préparation du projet, et sa mise en œuvre, ont fait l'objet d'une consultation suffisante des parties prenantes et bénéficiaires ?

#### **Questions related to Effectiveness**

- Est-ce que le montage institutionnel (PNUD comme agence de mise en œuvre qui signe des contrats avec des institutions internationales partenaires) a contribué à la réalisation des objectifs du projet ?
- Les partenaires internationaux ont-ils ajouté de la valeur à la mise en œuvre du projet?
- Qu'est-ce qui a bien fonctionné dans cette alliance et qu'est-ce qui a moins bien fonctionné?
- Est-ce que la coordination par le PNUD a été optimale ?
- Quelles seraient les recommandations pour l'avenir?

Examen des indicateurs pertinents aux activités mises en œuvre par le partenaire (avec le cadre logique comme support de discussion) – pour chaque indicateur :

- Est-ce que cet indicateur a été atteint ?
- Sinon pourquoi, quelles ont été les contraintes qui ont empêché son atteinte ?
- Quels ont été les risques influençant l'exécution des activités ?

#### **Questions related to efficiency**

Examen des activités mises en œuvre par le partenaire (avec le contrat et les plans de travail comme support) – pour chaque activité :

- Est-ce que cette activité a été mise en œuvre comme prévu dans le document de projet ? dans le plan de travail ?
- Sinon, pourquoi ?
- Quelles ont été les changements de contextes, les contraintes, qui ont empêché la bonne exécution des activités ?
- Est-ce que les risques et hypothèses prévues dans le document de projet se sont réalisés ?
- Est-ce que la mise en œuvre de ces activités a présenté un bon rapport coût-bénéfice pour répondre aux besoins des bénéficiaires ?
- Est-ce que le projet a permis d'initier, stimuler et faire lever sur des partenariats qui ont permis de démultiplier son efficacité ?

#### **Questions related to impact**

- Est-ce que selon vous les activités mises en œuvre par vous et les autres partenaires ont permis d'améliorer :
  - L'accès au marché ?
  - La situation sanitaire et phytosanitaire ?
  - Les revenus des ménages pauvres ?Comment et dans quelle proportion ?
- Est-ce que selon vous le projet a permis d'améliorer la prise de conscience des questions SPS ? sur quels sujets en particulier ? pour quels acteurs en particulier ?



- Est-ce que selon vous le projet a permis d'améliorer les capacités des acteurs sur les questions SPS ? sur quels sujets en particulier ? pour quels acteurs en particulier ?
- Est-ce que le projet a permis d'améliorer la participation des acteurs à l'élaboration des normes SPS ? comment ?
- Est-ce que le projet a contribué au processus d'adhésion des Comores à l'OMC ? si oui en quoi et comment ?
- Est-ce que le projet a selon vous permis de mobiliser des ressources additionnelles sur les questions SPS ? lesquelles ?

#### ***Questions related to sustainability***

- Est-ce que vous continuez à mettre en œuvre les activités initiées dans le cadre du projet ? selon les mêmes modalités ou différemment ? si oui avec quelles ressources ? si non pourquoi ?
- Est-ce que les bénéficiaires des activités que vous avez mises en œuvre continuent à en sentir les bénéfices ?
- Est-ce que les bénéficiaires des activités que vous avez mises en œuvre ont les capacités suffisantes pour faire perdurer les bénéfices de ces activités ?
- Avez-vous mis en œuvre des moyens pour assurer la continuation des bénéfices et le suivi ? Si non, qu'est ce qui devrait être fait ?
- Quels sont les principaux facteurs et contraintes qui influent sur la durabilité selon vous ?
- Pendant la mise en œuvre, quelles dispositions avez-vous prises pour assurer la durabilité des activités ?

#### ***Questions related to lessons learnt***

- Selon vous, quelles sont les principales leçons apprises de ce projet ?
- Y a-t-il des leçons particulières concernant :
  - L'utilisation des outils d'évaluation des capacités SPS
  - La facilitation de partenariats
  - La facilitation de l'accès au commerce
- Quelles sont celles qui devraient être partagées ? avec qui ?
- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer :
  - La documentation des leçons apprises
  - Leur dissémination
- Comment pourrait-on améliorer la valorisation des bonnes pratiques et leçons apprises ?

#### ***Questions related to crosscutting issues***

- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer la participation effective des femmes ? des jeunes ?
- Quel a été la proportion de femmes, de jeunes impliquées dans les activités sous votre responsabilité ?
- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer la prise en compte des enjeux environnementaux d'une manière générale ?
- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer la prise en compte de l'adaptation au changement climatique de manière spécifique ?

### **National partners**

#### ***Public sector***

#### ***General questions***

- Quelle a été votre implication/rôle dans la mise en œuvre du projet STDF
- De quelle manière avez-vous bénéficié du projet STDF ?
- D'une manière générale, comment s'est passé votre implication dans le projet et quelle est votre opinion sur l'appui apporté par le projet ? (Reposer la même question à la fin)?

#### ***Questions related to relevance***

- Quels sont les principaux problèmes rencontrés par les Comores dans le domaine SPS ?
- Est-ce que le projet STDF répondait aux besoins prioritaires du secteur agricole dans le domaine SPS ? au démarrage ? en cours de mise en œuvre si les circonstances ont changé ?
- Quelle était selon vous la valeur ajoutée du projet par rapport à d'autres projets SPS
- A votre connaissance, est-ce que la préparation du projet, et sa mise en œuvre, ont fait l'objet d'une consultation suffisante des parties prenantes et bénéficiaires, en particulier de votre institution ?

#### **Questions related to Effectiveness**

- Est-ce que le montage institutionnel (PNUD comme agence de mise en œuvre qui signe des contrats avec des institutions internationales partenaires) a contribué à la réalisation des objectifs du projet ?
- Les partenaires internationaux ont-ils ajouté de la valeur à la mise en œuvre du projet ?
- Qu'est-ce qui a bien fonctionné dans cette alliance et qu'est-ce qui a moins bien fonctionné ?

Examen des indicateurs pertinents aux activités mises en œuvre par l'institution ou pour lesquelles elle a reçu l'appui du projet (avec le cadre logique comme support de discussion) – pour chaque indicateur :

- Est-ce que cet indicateur a été atteint ?
- Sinon pourquoi, quelles ont été les contraintes qui ont empêché son atteinte ?
- Quels ont été les risques influençant l'exécution des activités ?
- Est-ce les outils et méthodes utilisés pour la formation et la sensibilisation étaient adaptés ?

#### **Questions related to efficiency**

Examen des activités mises en œuvre par l'institution ou pour lesquelles elle a reçu l'appui du projet (avec le contrat et les plans de travail comme support) – pour chaque activité :

- Est-ce que cette activité a été mises en œuvre comme prévu dans le document de projet ? dans le plan de travail ?
- Est-ce que cette activité a été mises en œuvre de manière optimale ? Sinon, pourquoi ?
- Quelles ont été les changements de contextes, les contraintes, qui ont empêché la bonne exécution des activités ?
- Est-ce que la mise en œuvre de ces activités a présenté un bon rapport cout bénéfice pour répondre aux besoins des bénéficiaires ?
- Est-ce que le projet a permis d'initier, stimuler et faire levier sur des partenariats qui ont permis de démultiplier son efficience ?

#### **Questions related to impact**

- Est-ce que selon vous les activités mises en œuvre par vous et les autres partenaires et celles dont vous avez bénéficié ont permis d'améliorer :
  - L'accès au marché ?
  - La situation sanitaire et phytosanitaire ?
  - Les revenus des ménages pauvres ?

Comment et dans quelle proportion ?

- Est-ce que selon vous le projet a permis d'améliorer la prise de conscience des questions SPS ? sur quels sujets en particulier ? pour quels acteurs en particulier ?
- Est-ce que selon vous le projet a permis d'améliorer les capacités des acteurs et celle de votre institution en particulier sur les questions SPS ? sur quels sujets en particulier ?
- Est-ce que le projet a selon vous permis de mobiliser des ressources additionnelles sur les questions SPS ? lesquelles ?
- Est-ce que le projet a permis d'améliorer la participation des acteurs à l'élaboration des normes SPS ? comment ?
- Est-ce que le projet a contribué au processus d'adhésion des Comores à l'OMC ? si oui en quoi et comment ?

### **Questions related to sustainability**

- Est-ce que vous continuez à mettre en œuvre les activités initiées dans le cadre du projet ? selon les mêmes modalités ou différemment ? si oui avec quelles ressources ? si non pourquoi ?
- Est-ce que les bénéficiaires des activités que vous avez mises en œuvre continuent à en sentir les bénéfices ?
- Est-ce que vous continuez à sentir les bénéfices des activités dont vous avez bénéficié ?
- Est-ce que les bénéficiaires des activités que vous avez mises en œuvre ont les capacités suffisantes pour faire perdurer les bénéfices de ces activités ?
- Est-ce que vous pensez avoir les capacités suffisantes pour faire perdurer les bénéfices de ces activités ?
- Avez-vous mis en œuvre des moyens pour assurer la continuation des bénéfices et le suivi ? Si non, qu'est-ce qui devrait être fait ?
- Quels sont les principaux facteurs et contraintes qui influent sur la durabilité selon vous ?
- Pendant la mise en œuvre, quelles dispositions avez-vous prises pour assurer la durabilité des activités ?

### **Questions related to lessons learnt**

- Selon vous, quelles sont les principales leçons apprises de ce projet ?
- Y a-t-il des leçons particulières concernant :
  - L'utilisation des outils d'évaluation des capacités SPS
  - La facilitation de partenariats
- La facilitation de l'accès au commerce
- Quelles sont celles qui devraient être partagées ? avec qui ?
- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer :
  - La documentation des leçons apprises
  - Leur dissémination
- Comment pourrait-on améliorer la valorisation des bonnes pratiques et leçons apprises ?

### **Questions related to crosscutting issues**

- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer la participation effective des femmes ? des jeunes ?
- Quel a été la proportion de femmes, de jeunes impliquées dans les activités sous votre responsabilité ou dont vous avez bénéficié ?
- Avez-vous bénéficié de formations, sensibilisation sur les questions environnementales et l'adaptation au changement climatique ?
- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer la prise en compte des enjeux environnementaux d'une manière générale ?
- Quelles dispositions avez-vous prises pendant la mise en œuvre pour assurer la prise en compte de l'adaptation au changement climatique de manière spécifique ?

## **Civil society and private sector**

### **General questions**

- De quelle manière avez-vous bénéficié du projet STDF ?
- D'une manière générale, quelle est votre opinion sur l'appui apporté par le projet ? (Reposer la même question à la fin)

### **Questions related to relevance**

- Quels sont les principaux problèmes liés aux questions SPS rencontrés par votre secteur d'activité ?
- Est-ce que le projet STDF répondait aux besoins prioritaires de votre secteur d'activité dans le domaine SPS ? au démarrage ? en cours de mise en œuvre si le contexte a changé ?
- Quelle était selon vous la valeur ajoutée du projet par rapport à d'autres projets SPS

- Avez-vous été consultés pour la préparation du projet, et sa mise en œuvre ? de quelle manière ? sur quels sujets ? est-ce que cela a été suffisant selon vous ?

#### **Questions related to Effectiveness**

Examen des indicateurs pertinents aux activités pour lesquelles le bénéficiaire a reçu l'appui du projet (avec le cadre logique comme support de discussion) – pour chaque indicateur :

- Est-ce que cet indicateur a été atteint ?
- Sinon pourquoi, quelles ont été les contraintes qui ont empêché son atteinte ?

#### **Questions related to efficiency**

Examen des activités pour lesquelles le bénéficiaire a reçu l'appui du projet – pour chaque activité :

- Est-ce que cette activité a été mise en œuvre de manière optimale ?
- Sinon, pourquoi ?
- Quelles ont été les changements de contextes, les contraintes, qui ont empêché la bonne exécution des activités ?
- Est-ce que le projet a permis d'initier, stimuler et faire levier sur des partenariats avec le secteur privé qui ont permis de démultiplier son efficacité ?

#### **Questions related to impact**

- Est-ce que selon vous les activités mises en œuvre le projet et dont vous avez bénéficié ont permis d'améliorer :
  - Votre accès au marché ? (donner des chiffres)
  - La situation sanitaire et phytosanitaire dans votre secteur ?
  - Les revenus de vos membres?

Comment et dans quelle proportion ?

- Est-ce que selon vous le projet a permis d'améliorer votre prise de conscience des questions SPS ? sur quels sujets en particulier ?
- Est-ce que selon vous le projet a permis d'améliorer vos capacités des acteurs sur les questions SPS ? sur quels sujets en particulier ?
- Est-ce que le projet vous a permis de mobiliser des ressources additionnelles sur les questions SPS ? lesquelles ?
- Est-ce que le projet a permis d'améliorer la participation des acteurs privés à l'élaboration des normes SPS ? comment ?

#### **Questions related to sustainability**

- Est-ce que vous continuez à mettre en œuvre les activités initiées dans le cadre du projet ? selon les mêmes modalités ou différemment ? si oui avec quelles ressources ? si non pourquoi ?
- Est-ce que vous continuez à sentir les bénéfices des activités dont vous avez bénéficié ?
- Est-ce que vous pensez avoir les capacités suffisantes pour faire perdurer les bénéfices de ces activités ?
- Quels sont les principaux facteurs et contraintes qui influent sur la durabilité de vos bénéfices ?
- Pendant la mise en œuvre, quelles dispositions avez-vous prises pour assurer la durabilité des activités ?

#### **Questions related to lessons learnt**

- Selon vous, quelles sont les principales leçons apprises de ce projet ?
- Quelles sont celles qui devraient être partagées ? avec qui ?

#### **Questions related to crosscutting issues**

- Est-ce que les femmes/ les jeunes ont été impliqué(e)s dans les activités dont vous avez bénéficié ?
- Quel a été la proportion de femmes, de jeunes impliqué(e)s dans les activités dont vous avez bénéficié ?

- Avez-vous bénéficié de formations, sensibilisation sur les questions environnementales et l'adaptation au changement climatique ?

### **Development partners**

- Quelles activités et projets avez-vous mis en œuvre depuis 2012 dans les domaines
  - Agricole
  - Appui au commerce
  - SPS
- Quelles sont selon vous les enjeux et les priorités en matière SPS pour les Comores ?
- Est-ce que les questions SPS font selon vous l'objet d'une attention suffisante aux Comores ? pourquoi ?
- Connaissez-vous le projet STDF ?
- Si oui, que pensez-vous de :
  - Son approche
  - Sa mise en œuvre
  - Ses résultats et son impact : en termes d'accès au marché, de situation sanitaire et phytosanitaire, de réduction de la pauvreté, de prise de conscience des questions SPS, de cadre institutionnel et politique ?
  - Son efficacité (par rapport à vos propres activités)
- Avez-vous collaboré avec ce projet ? si oui sur quelles activités ? selon quelles modalités ?
- Quelle est votre appréciation générale sur cette collaboration ?
- Quelles sont selon vous les leçons apprises de ce projet ? Peuvent-elles vous être utiles
- Avez-vous bénéficié d'une manière ou d'une autre des effets et impacts de ce projet dans le cadre de vos propres activités ? et vice versa ?

## Annex VI: List of people met

| <b>Name</b>                               | <b>Organization</b>           | <b>Role/position during implementation</b>                         |
|---|-------------------------------|--|
| Ediamine Bedja                            | FAO (Currently)               | National Coordinator (MoA)   |
| Hamza A. Azali                            | INRAPE                        | Director INRAPE  |
| Fakkridine Youssouf                       | Chamber of Commerce           | Former Chair   |
| Said Abdou Salim                          | Ministry of Economy and Trade | Cabinet Director<br>Chief Negotiator WTO<br>Former EIF coordinator |
| Ahmed MZE                                 | Comoros Mission in Geneva     | Economic Counsellor  |
| Khitami Soilihi                           | UNDP                          | Project Manager  |
| Hamid Papa                                | ITC                           | Project Technical Coordinator (UNDP)                               |
| Zalhata Dahalani                          | EIF                           | Director of Trade then EIF Coordinator                             |
| Ahamed Masouri                            | Ministry of Agriculture       | Codex Focal Point<br>Director of Agriculture                       |
| Charafoudine ONZADE<br>Youssouf Moutroifi | Ministry of Agriculture       | DVS & OIE Delegate   |
| Issmaila Mohamed                          | Ministry of Agriculture       | NPPO   |
| Nobataine Ali Mohamed                     | Ministry of Agriculture       | PREFER Project (IFAD)  |
| Ibrahima Bamba                            | IFAD                          | Country Director   |
| Ali Mgomri                                | Ministry of Agriculture       | PIDC Project (WB)  |
| Daniel Ali Bandar                         | Ministry of Agriculture       | Secretary General  |
| Goulame Fouady                            | General Planning Commissariat | Commissary   |
| Hissani ABDOU BACAR                       | WHO                           | Food Safety Focal Point  |
| Ms Ahamada                                | Women and Development Network | Chairperson  |
| Issa Madji                                | National Farmers Union        | Chairman   |
| Sitti Chihabiddine                        | Vanilla Exporter              | Private sector representative                                      |
| Dimitar Bratanov                          | WTO                           | In charge of accession processes                                   |