



1. Project Data

Project ID

P100478

Project Name

TN:GEF Managing Healthcare Waste and PCB

Country

Tunisia

Practice Area(Lead)

Environment & Natural Resources

L/C/TF Number(s)

TF-11541

Closing Date (Original)

31-May-2017

Total Project Cost (USD)

16,800,000.00

Bank Approval Date

26-Jul-2012

Closing Date (Actual)

31-May-2017

IBRD/IDA (USD)
Grants (USD)

Original Commitment

5,500,000.00

5,500,000.00

Revised Commitment

5,500,000.00

5,030,769.63

Actual

5,030,769.63

5,030,769.63

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2. Project Objectives and Components

a. Objectives

As per the Grant Agreement: "The objective of the Project is to reduce releases of dioxins, furans and Polychlorinated Biphenyls (PCBs) in Tunisia by strengthening the Recipient's legal and institutional framework and establishing sound and sustainable management programs for improving management and final disposal of healthcare waste (HCW) and PCBs."

As per the Project Appraisal Document (PAD): "The Project Development Objective (PDO) is to reduce releases of dioxins, furans and Polychlorinated Biphenyls (PCBs) in Tunisia by strengthening the Recipient's legal and institutional framework and establishing sound and sustainable management programs for improving management and final disposal of healthcare waste (HCW) and PCBs." The PAD does



not mention a Global Environmental Objective.

Both the statements are identical and are quoted above for ease of reference. For the purposes of this evaluation, the PDO statement from the Grant Agreement is used.

b. Were the project objectives/key associated outcome targets revised during implementation?

No

c. Will a split evaluation be undertaken?

No

d. Components

Component 1: Strengthening the Institutional Framework and Capacity for HCW and PCBs' Management at the national, regional and local levels (Appraisal Estimate US\$ 2.19 million, Actual Cost US\$ 1.44 million)

Subcomponent 1.1 Institutional support and adoption of best practices for HCW management by: (a) strengthening the institutional and regulatory framework and for HCW management at the national, regional and local levels; (b) conducting awareness and outreach campaigns, workshops and information and monitoring seminars for HCW management; and (c) providing training in HCW management, environmental assessment, collection and disposal of HCW, monitoring and evaluation, through the provision of consultants' services and training.

Subcomponent 1.2 Capacity and awareness enhancement for management and final disposal of PCBs by: (a) strengthening the regulatory framework for PCBs' management; (b) conducting awareness and outreach campaigns for PCBs' management; and (c) providing training in PCBs' management, through the provision of consultants' services and Training.

Component 2: Improvement of HCW and PCBs' Management and Disposal (Appraisal Estimate US\$ 12.84 million, Actual Cost US\$ 10.92 million)

Subcomponent 2.1 Improvement of HCW management and disposal through: (a) the acquisition of equipment for internal collection, and in situ storage of HCW in public healthcare facilities; (b) the supply of equipment to the intermediate and central storage units in public healthcare facilities in Grand Tunis, Sousse-Kairouan, Monastir-Mahdia, Sfax, Gabes, Medenine and Tataouine; and the preparation of Environmental and Social Management Plans (ESMPs) for such storage units; and (c) the transportation, and treatment of HCW in privately owned treatment facilities and final disposal in controlled landfills, through the provision of goods and consultants' services.

Subcomponent 2.2 Improvement of PCBs management and disposal through: (a) the transportation and elimination of in-stock PCBs-equipment, wastes and in-service PCBs-equipment in bad condition belonging to sector ministries; (b) the transportation and elimination of in-stock PCBs-equipment, wastes and in-service PCBs-equipment in bad condition belonging to public entities; (c) the preparation of ESMPs



for PCBs contaminated sites, and a study on the rehabilitation of contaminated sites; and (d) the decontamination of sites, through the provision of goods and carrying out of consultants' and non-consultants' services.

Component 3: Project Management (Appraisal estimate US\$ 0.38 million, Actual Cost US\$ 0.62 million)

This component includes (a) operational costs for the Project Implementation Unit (PIU). The PIU within *Agence Nationale de la Gestion des Déchets* - ANGED (National Waste Management Agency) in charge of implementation, coordination and technical and financial management of the Project; (b) establishment and maintenance of a monitoring and evaluation system; and (c) purchase of office equipment and materials.

e. Comments on Project Cost, Financing, Borrower Contribution, and Dates

Project Cost:

Total Appraisal Estimate: US\$ 16.8 million

Actual Disbursement: US\$ 12.7 million

Project Financing:

World Bank GEF contribution: Original Estimate US\$ 5.5 million; Actual Disbursement US\$ 5.2 million

Borrower contribution: Original Estimate US\$ 11.3 million; Actual Disbursement US\$ 7.5 million

(The co-financing commitment dwindled substantially in the post-conflict environment in which the project was being implemented - ICR page 8)

Key Dates:

Approval: 26 July 2012

Effectiveness: 29 Jan 2013

Restructuring: 10 Nov 2016 (involved reallocation between disbursement categories)

Project Closing: 31 May 2017 (as planned)

3. Relevance of Objectives

Rationale

The project was prepared in the aftermath of the Tunisian Revolution which took place in January 2011. The Bank developed an Interim Strategy Note (ISN) as an indicative program of support from July 2012 through June 2015. This program focused on the new development priorities important to improve public management and accountability, job creation, and social inclusion. As background, Tunisia has a strong record of improving environmental management and performance. The cost of environmental degradation has been estimated at 2.1 percent of GDP, the lowest in the Maghreb region. Tunisia became a party to the Stockholm Convention in 2004 and improved waste management was among the priorities of the 11th National Development Plan from 2007. Despite attempts to reform the waste management sector, no agency



was given overall control of healthcare waste (HCW) management in Tunisia, and the application of penalties for noncompliance was not regularly enforced for all health care entities throughout Tunisia, according to the ICR. The rationale for Bank involvement was based on its capacity to transfer knowledge, and best available practices for waste management in a flexible manner. Within the scope of the Interim Strategy Note for FY13/FY14, the Bank supported Tunisia in strengthening governance and inclusion, particularly focused on transparency and accountability issues as they related to the state. This project supported the objectives outlined in the ISN by strengthening public institutions and extending public services to remote areas. It also complemented the overall portfolio of investments in Tunisia (the Bank is helping the Government of Tunisia to establish a cost recovery system in the water and sanitation sector, to modernize the waste management sector through the Municipal Solid Waste Management Project, and to prevent the release of ozone depleting substances). The development objectives of the project have remained relevant to the strategic priorities outlined within the context of the Country Partnership Framework (CPF) for the period FY2016 through FY2020, where environmental management remains a priority for the Government of Tunisia. Given the political transition since 2011, development priorities and Bank engagement in Tunisia focused increasingly on improving accountability, governance, and security, on building inclusive, private sector-led development, and on promoting voice and social inclusion for people and regions left behind. By strengthening the regulatory and institutional frameworks for managing HCW and PCBs, the project contributes substantially to the objectives of the CPF. Overall public-sector accountability and performance-based governance is strengthened through the allocation of funds from the national budget to the Ministry of Health for the processing of HCW, the participation of state-level hospitals in safely disposing PCBs and updating the national PCB inventory. The project, by reducing the release of furans and dioxins and by eliminating PCBs directly helps to mitigate climate change. It has also promoted private sector participation in the collection, transport, treatment, and disposal of HCW.

Rating

Substantial

4. Achievement of Objectives (Efficacy)

Objective 1

Objective

PDO Outcome (i): Reduce releases of dioxins and furans by strengthening legal and institutional framework and establishing sound and sustainable management programs for improving management and final disposal of healthcare waste (HCW)

Rationale

The reduction in the release of dioxins and furans, together, is considered to be the first PDO outcome. This is because both substances are released through the illegal incineration of health care waste (HCW). According to the PAD and as reported in the ICR, a yearly elimination of 3,200 tons of HCW corresponds to an 8 percent reduction in the release of furans and dioxins originating from the illegal and uncontrolled incineration of HCW. Reducing the release of dioxins and furans was achieved through the processing of 3,274 tons of HCW in the final year of implementation (2017).



Outputs

In terms of strengthening the legal and institutional framework and establishing sound and sustainable management programs for improving management and final disposal of HCW, the project achieved the following outputs (ICR page 12):

- Regulatory level: Developed Guidelines to operationalize decree No. 2008-2745 of July 28, 2008;
- Institutional level: 15 framework manuals with specific standards for the treatment of HCW for each type of health care establishment and 118 specific manuals for public and private health care entities;
- Operational level: 97 ESMPs specific to each health care facility. Delivery and installation of ventilated intermediary storage units and refrigerated centralized storage facilities to 97 public health care entities for safely storing HCW. Promotion of autoclave technology with 7 private incinerator companies;
- Training: 1,841 participants received formal training in safe handling of HCW (for physicians including medical service providers, HCW managers, hospital directors, paramedical corps, inspectors and supervisors of Ministry of Health, private investors, etc.). An additional 1,368 participants were sensitized to the dangers of HCW and the importance of safe practices

Outcomes

At the end of the project, a total of 118 public and private health care facilities were linked to the project and working towards compliance with the law and regulations on processing HCW. Due to awareness raising, and sensitization campaigns undertaken during project implementation, public interest in safe processing of HCW continues to grow, according to the ICR (page 12). While many of the linked facilities were in full compliance by project closing, others were in the process of installing provided materials. As delivery and installation of ventilated intermediary storage units and refrigerated centralized storage units at the site of each health care facility through 2016 and 2017, it was expected that the amount of eliminated HCW would increase at a faster pace going forward, as per the ICR (page 12) as well as the TTL interview. Thus, by strengthening the regulatory framework and promoting a new model based on best available techniques and practices in the context of HCW management, the project introduced sound and sustainable management practices with a strong demonstration effect. In February 2017, the Ministry of Health (MOH) and 6 private service providers of HCW treatment and disposal signed a 5-year contract replicating the model in the near future.

Rating

Substantial

Objective 2

Objective

PDO Outcome (ii): Reduce releases of Polychlorinated Biphenyls (PCBs) by strengthening the legal and institutional framework and establishing sound and sustainable management programs for improving management and final disposal of PCBs

Rationale



The reduction in the release of PCBs is considered to be the second PDO outcome. The project sought to eliminate 1,100 tons of PCB-contaminated oil, waste, and equipment belonging to sector ministries and public entities. Reducing the release PCBs was achieved by eliminating PCB contaminated equipment, oil and waste. By strengthening the regulatory framework and promoting best available techniques and practices in the context of PCB management, the project improved institutional capacity for the continued safe handling and final elimination of the remaining inventory of PCBs in Tunisia. PCBs were eliminated through inventory, collection, repackaging, transport to the Port of Tunis, and export to Belgium for treatment and final destruction. At the time of project closing, 1,044 tons, which represents 95 percent of the target and of inventoried PCB at the identified sites, were retrieved from 22 holders of PCB at 67 different sites in 20 governorates in Tunisia. The PCB was exported in 55 containers over 16 shipments between June 2016 and February 2017.

Outputs

In terms of strengthening the legal and institutional framework and establishing sound and sustainable management programs for improving management and final disposal of HCW, the project achieved the following outputs (ICR page 14):

- Regulatory level: Developed guidelines defining the specific conditions and procedures to be followed in safely eliminating PCBs (both in stock and in use, as well as in good condition and in bad condition),
- Institutional level: 20 management plans for each entity holding PCBs prepared. Delivery of laboratory equipment for analyzing PCB at three sites, including the National Environmental Protection Agency (ANPE), Société Tunisienne de l'Electricité et du Gaz (STEG), and ANGEd. Obtainment of notification document for the international movement of hazardous chemicals,
- Operational level: ESMPs for each site, where PCB was stored, prepared. Site visit and analysis of PCB contaminated equipment was carried out. Procurement of the inventory, collection, repackaging, transport, and elimination of 1,544 tons of PCB completed. Decontamination of PCB storage sites,
- Training: Training courses on PCB management were organized at local, regional, and national level for a total of 1063 participants. Study tours were carried out for the benefit of PCB holders and competent authorities.

Outcomes

According to the ICR, an additional 200 tons of PCB-contaminated oil and equipment and more than 300 tons of contaminated soil was currently stored and awaiting elimination. A request for the notification of trans-boundary movement of hazardous waste had been re-launched in accordance with the Basel Convention. Only in-stock out-of-use PCB contaminated equipment were eliminated, with no retro-filling of oil in the transformers taking place. At the time of project preparation, it had been envisioned that the project would also handle in-service PCB-contaminated equipment in bad condition. As an outcome of this project, the national PCB inventory was available online and instantaneously updated, tracking every move of PCB-contaminated equipment.

Rating

Substantial



Rationale

The achievement of the first PDO outcome - the reduction in the release of dioxins and furans - was substantial. As mentioned above, a yearly elimination of 3,200 tons of HCW corresponded to an 8 percent reduction in the release of furans and dioxins originating from the illegal and uncontrolled incineration of HCW. This reduction was achieved through the processing of 3,274 tons of HCW in the final year of implementation (2017).

The achievement of the second PDO outcome - the reduction in the release of PCBs - was also substantial. PCBs were eliminated through inventory establishment, collection, repackaging, transport to the Port of Tunis, and export to Belgium for treatment and final destruction. At the time of project closing, 1,044 tons, which represents 95 percent of the target and of inventoried PCB at the identified sites, were retrieved. By strengthening the regulatory framework and promoting best available techniques and practices in the context of PCB management, the project improved institutional capacity for the continued safe handling and final elimination of the remaining inventory of PCBs in Tunisia.

Based on substantial achievement of overall PDO and sub-objectives, the overall efficacy is rated as substantial.

Overall Efficacy Rating

Substantial

5. Efficiency

For HCW, project design was based on a cost-effectiveness approach and GEF funds were used to develop the design, build the capacity, and purchase the required storage units and hospital equipment. The MOH funds were used for the actual processing of HCW, and the private sector was engaged in the implementation of the waste treatment. The overall cost of treated HCW at \$358 compared favorably with the WHO standard of \$400 for the European market, although higher than other developing countries.

For PCBs, a part of the funds was used to contract establishment of inventory, and the collection, repackaging, transportation and treatment of the toxins. The other part was used for developing technical guidelines and capacity building. Cost savings were realized for activities relating to PCBs elimination (actual expenses were 58% of the original estimates). There were no cost overruns due to delayed implementation or extension of project closing date. The project was completed on time and under budget as per the ICR (page 15) as well as the TTL interview.

An economic analysis was not conducted for the project. However, the ICR as well as the TTL stated the positive externalities associated with the project, directly on the health of the population and the overall environment, such as: (i) reduced health and environmental risks due to the treatment and removal of dangerous HCW emitting dioxins and furans – thus reduced contamination of soils, fauna, groundwater, and surface water; (ii) reduced potentially high costs related to both human and environmental costs from illegal incineration of toxic HCW; (iii) reduced potential clean-up costs in case of a leak of PCB-contaminated oil



stored in uncontrolled, and potentially deficient environment, whereby the risks could far outweigh the cost of elimination by repackaging, export and final destruction of chemicals abroad – thus reduced risk of large scale spills due to poor stocking and technical deficiencies of storage facilities; (iv) and reduced threat to health and safety by accidental skin contact, inhalation, and ingestion related to the unsafe handling of PCB containing equipment and waste by unqualified workers.

Efficiency Rating

Substantial

a. If available, enter the Economic Rate of Return (ERR) and/or Financial Rate of Return (FRR) at appraisal and the re-estimated value at evaluation:

	Rate Available?	Point value (%)	*Coverage/Scope (%)
Appraisal		0	0 <input type="checkbox"/> Not Applicable
ICR Estimate		0	0 <input type="checkbox"/> Not Applicable

* Refers to percent of total project cost for which ERR/FRR was calculated.

6. Outcome

As per the objectives based evaluation methodology, the overall Outcome rating derived for this project is Satisfactory. The relevance of project objectives was substantial at design and at project closure. The project objectives were realized and hence the Efficacy was rated Substantial. Finally, the project was implemented efficiently and hence the Substantial Efficiency rating. On this basis, the Outcome rating is Satisfactory.

a. Outcome Rating

Satisfactory

7. Risk to Development Outcome

Based on the ICR (page 22) and the TTL interview, the overall risk to development outcome is moderate. For HCW, the project introduced best available techniques in processing HCW to the 97 participating health care entities and 7 private sector treatment sites which were supported by funds allocated from the national budget to the MOH. With the closure of a 5-year contract in 2017 valued at over US\$10 million between the MOH and private service providers undertaking the collection, transport, treatment, and final disposal of HCW, this model is being replicated for the near future. Given that GEF funds were used to supply the initial refrigerated storage units and freezers for HCW, the question is whether the MOH will find the resources to



expand those investments to non-participating health care facilities. With continued political support and stability, however, there are good reasons to believe that improved compliance on the part of both public and private health care facilities will expand, thus anchoring the model to support itself, even beyond 2022, as per the ICR (page 22) and TTL interview. However, the funding question leads to moderate risk assessment for this sub-objective.

For PCBs, there are low risks posed to the achieved development outcomes as the 1,044 tons of PCBs have been definitively eliminated from the country. The risk that the remaining 500 tons of PCBs will not be eliminated is also low given that the contract has already been renewed and its execution is awaiting final approval of transboundary movement of PCBs in accordance with the Basel Convention. Tunisia is on track to eliminate all PCBs by 2025 in accordance with the Stockholm Convention given the anticipated issuance of a decree on PCB elimination and strong political commitment. Further, significant capacity for PCB management and handling has been built at both a national and technical level. Going forward, Tunisia will likely continue to rely on export of PCBs for their destruction.

8. Assessment of Bank Performance

a. Quality-at-Entry

The overall Bank performance as assessed by strategic relevance and approach, as well as for technical aspects was satisfactory. Being an environmental project, the project was satisfactory in engaging with policy and institutional aspects. As per the ICR (page 21), the project preparation could have benefitted from better monitoring and evaluation arrangements at entry so that ambitious emissions reductions at project sites could have been better monitored from the start. The project objectives were finally achieved in a timely manner and the capacity of the local institutions was augmented. Feasibility studies conducted at the preparation stage helped design and target the operation to the governorates accountable for 45 percent of all HCW produced in Tunisia. Environmental audits conducted at various health care facilities were used to estimate waste composition and generation rates. This information was subsequently used to determine the specific investments needed, e.g. for storage, treatment, and transportation. For PCB, inventories were used to estimate transport, storage, and destruction requirements of risky PCB wastes as well as on-site management and subsequent phase-out of lower risk in-service PCB equipment.

Quality-at-Entry Rating

Satisfactory

b. Quality of supervision

The overall supervision and monitoring of the project was satisfactory with adequate supervision of inputs and processes, focus on the development impact, despite the tumultuous start to the project shortly after the Arab spring, and weak performance recorded at the time of the mid-term review (MTR). According to the ICR, technical, fiduciary and safeguards issues were addressed adequately, and following the MTR, all identified implementation challenges were dealt with in a timely manner. Implementation delays arose due to the prevailing country context and issues regarding procurement. Disbursement issues also arose during the implementation phase. Different political factions in power prior to the presidential election and adoption of a



new constitution in 2014, with frequently changing political appointees to lead the various ministries and agencies, posed a lack of individual and institutional commitment to the project at a high level, thus causing significant implementation and disbursement delays. At the time of MTR in November 2015, there was a 79 percent disbursement lag and the Bank was considering suspending the project (ICR page 18). The MTR offered time-bound recommendations and an Action Plan to bring the project back on track. The main issues addressed related to an overhaul of the PIU, the lack of involvement of the Steering Committee, the lack of response from the Central Bank on issues concerning the replenishment of the designated special account, which at one point was 10 months inactive. There were complex procurement and payment procedures at ANGEd as well as some duplication between Bank and country systems resulting from the dual structure of the HCW and PCB sub-components, operating semi-autonomously with separate methodologies and partners. Through close supervision, the government reinforced the PIU at ANGEd, and conducted weekly briefings to the new Minister of Environment by ANGEd. Subsequently, it was able to elicit a shorter response time from the Central Bank in processing the signing of two major contracts. Export clearances and the notification of transboundary transport of dangerous waste was obtained rapidly as well. Disbursements quickly picked up during 2016 and by project closure, 95 percent of grant funds had been disbursed and targets met. In spite of the challenges, intended project results were achieved by project closure.

Quality of Supervision Rating

Satisfactory

Overall Bank Performance Rating

Satisfactory

9. M&E Design, Implementation, & Utilization

a. M&E Design

The theory of change presented in the ICR was sound and facilitated assessment. The ICR noted that the responsibility of M&E lay with the PIU situated at ANGEd, and that the project was ambitious in trying to tie the quantitative targets of emissions reduction with the institutional strengthening and capacity building objectives of the project.

b. M&E Implementation

There were significant short-comings in the implementation of an M&E system, according to the ICR and TTL due to an ambitious plan to have a full M&E system in place and operational by the end of the first year of implementation. However, this did not materialize until January 2017, a few months prior to project closing. An M&E specialist was integrated into the PIU following the mid-term review of the project, and supported the finalization of M&E software / online public database at ANGEd for tracking HCW and PCBs - www.pops-tunisie.tn

For PCBs, proof of elimination lay in the documentation on export, treatment and destruction of the PCB in



Belgium and for HCW, proof of elimination was established through an accounting practice of aligning contractual commitments against receipts and other operational documentation presented by the private sector treatment sites to the MOH, according to the ICR (page 19).

c. M&E Utilization

Data obtained through monitoring and evaluation at the level of each state-owned enterprise possessing PCBs was used to update the national inventory of PCBs. M&E activities revealed additional PCBs stored at different locations and tracked the eliminated PCBs in support of Tunisia's path to removing all PCBs by 2025. The online portal www.pops-tunisie.tn has made data available to the general public with the aim to increase public sector accountability.

M&E Quality Rating

Modest

10. Other Issues

a. Safeguards

According to the ICR (page 20), the project was consistently rated Satisfactory on safeguards issues. The project triggered OP/BP 4.01 and was categorized as a safeguards Category A with a full Environmental and Social Impact Assessment. While the project was essentially a clean-up project, there were certain risks associated with the hazardous nature of the substances to be treated, including human contact and environmental spills. The project fulfilled all safeguards requirements and remained in full compliance throughout the project period. Based on an environmental and social management framework developed during project preparation, site specific ESMPs were prepared during project implementation for HCW storage and treatment sites. Similarly, for PCBs, environmental and social management plans were prepared for individual sites or group of sites as part of the bidding documents. According to the implementation arrangements, all ESMPs were reviewed by ANGEd and approved by the Bank.

b. Fiduciary Compliance

With respect to fiduciary compliance, while there were significant procurement and disbursement delays as described in the section on Bank supervision (8.b above), there was no instance of non-compliance. Issues were related to a 79% disbursement lag equal to 9 months; delays in submission of audit reports and scopes of reports not complying fully with Bank standards; delay in submitting financial statements; and 7 months' inactivity of the Designated Account (ICR page 20). Based on a PRIMA review of adequacy of project financial management arrangements for budgeting, accounting, internal controls, funds flow, financial reporting and auditing, the financial management rating was upgraded in June 2016 until the close of the project. The procurement process was significantly delayed (ICR page 20-21), and a procurement assessment was carried



out mid-way, which identified bottlenecks and inadequacies in the system. After a complex and rigorous procurement process, including retendering due to a technical mistake, the ICR noted that all signed contracts were properly executed, and that payments were timely and conformed with the modalities defined in the contracts.

c. Unintended impacts (Positive or Negative)

NA

d. Other

NA

11. Ratings

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Satisfactory	Satisfactory	---
Bank Performance	Satisfactory	Satisfactory	---
Quality of M&E	Modest	Modest	---
Quality of ICR		Substantial	---

12. Lessons

The following lessons have been identified and/or adapted from the ICR:

Well designed, thoroughly prepared and diligently supervised projects can be sustained even through challenging times. In spite of the difficult country context, including several political changes in the first year of project implementation, the project closed on time and achieved satisfactory results. Timely supervision and close monitoring from the Bank were required to keep the project on track.

Centralizing procurement removes friction at the operational level. In structuring the contractual arrangements of the waste management process, the project initially left it up to each individual public-sector health care facility to procure the services of a private-sector provider for HCW collection, treatment and disposal. As such, the processing of HCW from public health care providers depended on each entity's capacity for timely and reliable procurement and fulfillment of payments. This led to interrupted service and improper management of HCW, thereby undermining the project objectives. By centralizing procurement in geographic regions at the level of the competent, responsible entity, namely the MOH, procurement and contractual management was more effectively handled, leading to improved service provision at the operational level.



Arrangements for M&E should receive close attention during the assessment of project readiness. The project intended to have a "full M&E system in place and operational" by the end of the first year, however, this target was not reached until towards the very end of the project. Defining explicitly what the "M&E system" should consist of and explaining what was meant by "in place and operational" would have aided the implementation phase. Often, when preparing Bank projects, M&E is briefly dealt with by delegating the responsibility to the implementing unit and referring to the results framework. If M&E formed a more substantial part in assessing project readiness, projects would benefit through better tracking of progress, thereby increasing the capacity of the project to make informed adjustments. This is an old lesson, but repeated here as also mentioned in the ICR.

13. Assessment Recommended?

No

14. Comments on Quality of ICR

The ICR is well-written, thorough, and comprehensive. It provides good quality evidence as well as good quality of analysis in the narrative. Apart from some formatting issues (clarified by the ICR co-author), the ICR is internally consistent and results oriented. It also provides some useful lessons and is consistent with guidelines. The additional annexes in the full version of the ICR that have been publicly disclosed, make it a lengthy document, and consolidation would merit consideration.

a. Quality of ICR Rating

Substantial