

**Ex post evaluation of the STDF Project to Develop an
SPS Action Plan for Cambodia (STDF/PG/246)**

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FOREWORD

Information on the consultant's background relevant to the independent evaluation of STDF/PG/246

I have worked extensively in Cambodia as a consultant on biosecurity and food safety issues over the past decade. Initially (2003-2006) I carried out a number of contracts under the European Union's Multilateral Trade Project for Cambodia and Laos, for which the local counterpart was the Ministry of Commerce. Included in this work was: a strategic review of MoC's inspection arm, Camcontrol; studies of food inspection arrangements and food law; a project on adoption of international food standards; and a review, with recommendations, of inter-Ministry arrangements for food control. For the Asian Development Bank I carried out a series of missions to develop a Risk Management Unit in Camcontrol. For the World Bank I participated as a member of the team that conducted the mid-term review of the Trade Development Support Program (TDSP), and subsequently I was contracted to advise on a range of related issues including design of several SPS capacity-building projects. In the course of this latter activity I referred to the STDF/PG/246 report. For STDF in 2005, I implemented STDF/PPG/061 on strengthening SPS capacity in Cambodia. For the past several years I was under contract to the International Finance Corporation to facilitate introduction of risk-based inspection of food factories in Cambodia by the Ministry of Industry, Mines and Energy.

Specifically in relation to STDF/PG/246, I was asked by the FAO project team to review and comment upon several drafts of the report in the course of its preparation. Further, in 2011, when under contract to the World Bank as an SPS expert I was tasked to make a presentation of the STDF/PG/246 report to the Sub-Steering Committee on Trade Development and Trade-Related Investment which is responsible for strategic oversight of Cambodia's trade integration process, facilitated through the Trade SWAp framework. My presentation to the Sub-steering Committee was cleared with and delivered in the name of the leader of the STDF/PG/246 team, Mike Robson, but on the occasion I also gave my own recommendation on implementation of the report in my capacity as World Bank consultant.

In accordance with usual practice, final responsibility for the STDF/PG/246 report rests with the project team. This evaluation of it is given independently and objectively on the basis of my professional knowledge and experience of SPS capacity-building and of SPS issues in Cambodia in particular.

Digby Gascoine
June, 2013

EXECUTIVE SUMMARY

1. STDF/PG/246, a project to develop an action plan to improve SPS capacity in Cambodia, was approved in June 2008. Its genesis lay in a review of prior studies culminating in an STDF regional workshop convened in Phnom Penh in May 2008. The project was implemented, by FAO, from May 2009 to July 2010. The action plan was then conveyed to the Minister of Commerce of the Royal Government of Cambodia, and in January 2011 the Minister commended the report and endorsed it for immediate action. Subsequently the report was presented to the Sub-Steering Committee on Trade Development and Trade-Related Investment for consideration. Since that time no significant action has occurred to implement the plan by means of specific capacity-building projects.

2. The compilation of the report and the action plan by the STDF/PG/246 project team, and the associated consultation processes, appear to have been carried out competently. Arguably the report and plan could have been somewhat more comprehensive and detailed but overall the project's output was sensible, robust, and in the context of the situation in Cambodia more than useful.

3. At least when originally conceived, the project's Terms of Reference (ToR) were appropriate and the resourcing of the project was at least adequate. There was also strong donor support for the concept. But evidently when it received the report the Cambodian Government was not so interested in SPS capacity building that it was prepared to push strongly for the conversion of the action plan recommendations into fundable projects and to pursue that funding through the readily available facility of the Trade Development Support Program/Sector Wide Approach (TDSP/Trade SWAp)¹ established by the World Bank and other donors and implemented through the Ministry of Commerce. Donors had also cooled in their enthusiasm for following an approach to SPS capacity-building based on a coherent, prioritized plan.

4. A significant factor in the apparent lack of up-take of STDF/PG/246 recommendations may have been the Asian Development Bank's Greater Mekong Sub-region SPS-related trade facilitation project, the Cambodian component of which is quite large and is now being implemented. The ADB project to design a program of support for SPS capacity-building in the region was conducted in the same timeframe as STDF/PG/246. There is a view amongst the development partners (donors) that the ADB GMS project is so large it has prompted the Cambodian Government to turn away from seeking additional technical assistance for SPS capacity-building. In this situation little is likely to come of STDF/PG/246 without a strong push to canvass its merits amongst potential beneficiaries in relevant Ministries of the Royal Government of Cambodia (RGC) and simultaneously to seek out donors who have resources available or soon to be available to invest in projects. As is so frequently the case, the essential link between recommended actions and implementation is project design. STDF should consider whether, in the event that sufficient interest is shown by the Cambodian authorities, it should devote some of its resources to funding design of a small number of specific projects that would implement STDF/PG/246 Action Plan recommendations.

5. Three years after the completion of STDF/PG/246 there has been no further request for an STDF project attempting to formulate a national SPS capacity-building action plan for any other country. One obvious question arising from the present review is whether such a project should be contemplated in future, if a request is received from another country, and if so in what way it might be designed or implemented differently from STDF/PG/246. In particular, is it worthwhile to attempt to make coherent plans without a prior commitment on both sides of the development partnership to their implementation?

6. An orderly, coherent, prioritized approach to national SPS capacity-building is unlikely to be adopted by the relevant national authorities unless they are given the necessary tools and resources. Agencies may be more interested in projects that will increase local prestige or give some economic advantage to them in a corporate sense, and in any event the agencies often lack the capacity to articulate and argue for related technical assistance. On the supply side, donors may lack the technical capacity to judge the best uses for the funds they have available, and they find it difficult to resist the bias of their local clients towards funding acquisition of physical assets and for training. Direct coordination of donor activities through local liaison mechanisms is

¹ The TDSP is a US\$12.6 million programme for implementation from January 2009 – January 2014.

attempted in many countries, but does not always succeed in eliminating duplication or rivalry (especially where actions are driven from the headquarters or regional offices of the organizations).

7. The formulation of a national action plan offers a path around these problems. It is a process that engages all of the key SPS-related agencies in identifying and prioritizing capacity-building projects and that leads logically to a programmatic approach to implementation. It enables the rationale of each project to be seen from a national perspective. It presents a menu of good potential projects to the development partners. The issue is not, therefore, with the utility of the action plan as a tool for organizing technical assistance for sound uses, but rather how to have this utility recognized by the partners and acted upon. This report identifies several possible approaches.

8. One approach would be to provide STDF support for broad-scope action planning projects only when they are clearly and strongly backed by all of the relevant national agencies and when there is firm commitment for specific follow up action by a donor or donors. Unfortunately, such favourable circumstances are likely to be rare, and there will always be the risk (as in the case of STDF/PG/246) that the interest of local agencies and/or potential donors may weaken over the course of the project. Since STDF is one of the few organizations that is positioned to initiate activities, like action planning, that can facilitate more rational, less piecemeal capacity building in the SPS field, it should not set the bar so high.

9. Certainly the STDF partners need to be pro-active in catalysing and sustaining donor interest in using a coherent national action plan as the basis for SPS capacity building. Consultation with donors before, during and after the development of the action plan must be focused on encouraging donors to build the plan into their forward budgeting for technical assistance so that funds are available as soon as the plan is ready. The meshing of action planning and donor budgeting will require that when the action plan is available it is accompanied by detailed specifications for a number of specific project investments suitable for donor funding, these projects being the most immediate and highest priorities identified in the plan. The terms of reference and budget for the STDF-funded action planning project must therefore cover the analytical phase, the formulation of the plan, the design of the initial implementing projects, and the consultation activities.

10. Secondly, the means must be found to reinforce and sustain local interest in the project, so that there is a strong prospect that the beneficiary will want to act on the plan once produced. Part of the solution will be to find an approach to circumventing the adverse effects of inter-Ministry tensions. The formation of a multi-agency advisory body for the project, as employed in Cambodia for STDF/PG/246, is an obvious option, but may not prove adequate to the task if one of the participants is dominant. An alternative is to have the local counterpart organization be one that has a coordinating role within the national government, rather than a line ministry or agency. More importantly, the terms of reference for the project should explicitly require activities by the project team to engage the attention and interest of the local Ministries/agencies. Obviously this will be contingent on, more than anything else, a commitment by a donor or donors to fund to a significant amount at least some important capacity-building projects included in the Action Plan. It would also be valuable for STDF to seek a prior commitment from the host government at a sufficiently senior level to the procedure that will be followed domestically to consider, evaluate and act upon the action plan once it has been completed. A government is unlikely to go so far as to commit to implementation of an action plan sight unseen, however desirable that might be from the perspective of ensuring value from STDF's investment, but it is not unreasonable to expect a commitment by government to giving proper formal consideration to a proposed action plan.

11. Finally, in the event that (as occurred in Cambodia) another donor demonstrates an intention to initiate a parallel action planning project, with significant budget, in the same country and this donor cannot be persuaded to proceed in a coordinated way, consideration should be given to delaying or cancelling the STDF project.

2 INTRODUCTION

2.1 Origins of STDF/PG/246²

12. The terms of reference for the present review explain the background of STDF/PG/246 as follows:

As part of the Aid for Trade Initiative, the STDF held a regional workshop on the mobilization of resources for SPS capacity building in Phnom Penh, Cambodia from 21-22 May 2008. The workshop was attended by representatives from government agencies in Cambodia, Lao PDR., Viet Nam, Myanmar, China and Thailand, as well as development partners. It concluded a year-long process to synthesize the results of SPS capacity evaluation studies in the GMS, conducted by international organizations including FAO, the OIE and the World Bank. Specifically, it mapped existing and planned SPS assistance in Cambodia, and identified outstanding gaps and priorities in consultation with government agencies and development partners. ... The development of a comprehensive SPS action plan for Cambodia was identified as a particular capacity need at this workshop.

13. The recommendation to develop a comprehensive SPS action plan had been crystallised in a paper prepared as an input for the above-mentioned STDF regional workshop.³ During this workshop, the idea was recommended in a presentation by Dr van der Meer and Laura Ignacio in the following terms:

... it is recommended that a comprehensive SPS policy be developed. ... this policy should be underpinned by an action plan based on crosscutting and sectoral needs which takes into account the Government's poverty reduction and economic growth objectives. The food safety and agricultural health action plans developed by the World Bank for Lao PDR and Viet Nam are a possible model in this respect.

14. According to the report by Kees van der Meer for the STDF regional consultation:

The World Bank ... prepared comprehensive action plans for SPS capacity building for Lao PDR and Vietnam, covering food safety, animal health and plant health. The studies have a prioritized action table with investment needs identified to solving the main deficiencies in capacities. The action plans are based on assessments of (1) actual and potential competitive strength in international markets for groups of products, (2) risks and costs of non-compliance and health hazards caused by unsafe food, pests and diseases, (3) bottlenecks in public and private sector SPS management capacities, and (4) priority of measures that can be taken in about five years based on expected returns.

The ... plans contain an overview of public policies and support for capacity building provided by donors and international agencies. ... [T]he action table for Lao PDR [is] an example of the coverage and level of detail of SPS action plans. In both countries the Action Plans were adopted by the Government and their implementation is pursued by Government programmes with support from projects funded by donors and the World Bank.

² The concept of preparing national plans for systematic SPS capacity-building based on needs assessment has an extensive history in the STDF. In 2003 STDF contracted the writer to prepare a project proposal for the development of an appropriate approach to implementation of this concept that could be the subject of a demonstration project. Subsequently STDF/PG/020 aimed to carry out baseline studies of SPS capacity and apply cost-benefit analysis to examine returns on investment in terms of foreign trade and an improved SPS situation in Peru and Uganda. In 2005, working under the EU's Multilateral Trade Assistance Project for Laos and Cambodia, I recommended that donors in Cambodia should establish a coordination group to focus specifically on SPS capacity-building activities, and I further recommended that an SPS capacity-building planning framework should be developed. These recommendations were accepted by the Senior Minister/Minister of Commerce, but not implemented. In 2007, in the keynote address to the STDF Aid for Trade Workshop held in Manila, I recommended that the World Bank's structured and prioritized approach to SPS capacity-building should be applied in Cambodia.

³ Kees van der Meer. Overview of SPS Capacity Building Needs Assessments and Compliance Studies for Cambodia, Lao PDR and Vietnam 2001-2006. Research work for the STDF. Available at: http://www.standardsfacility.org/Files/AidForTrade/Consultation_GM_C.V.Meer.pdf

15. In June 2008, the STDF Working Group approved a request for an STDF project (STDF/PG/246) to develop an action plan to improve SPS capacity in Cambodia. The project was a direct output of the aforementioned STDF regional workshop in Phnom Penh in May 2008.

16. The primary output was to be a 60 page draft strategy document with Action Plan supported by annexes that would be submitted to the Government and other stakeholders. The study would bring together information on agro-food trade, food safety, plant and animal health, compliance issues, and capacities. It would discuss policy options and propose priorities for public sector policies, regulatory and institutional adjustments, and public and private investments for managing sanitary and phytosanitary measures. An excerpt of the terms of reference is at Annex 1.

2.2 Implementation of STDF/PG/246

17. The project was implemented by FAO from May 2009 to July 2010, with a total budget of US\$199,360. The FAO project team worked closely with a national task force, comprised of nominated representatives from the Ministries of Commerce, Agriculture, Industry and Health in Cambodia. The Task Force met on seven occasions and its proceedings were duly documented. Development partners and related projects in Cambodia, notably projects funded by the Asian Development Bank (ADB) on SPS management systems and trade facilitation, were consulted.

18. The main output of STDF/PG/246 was an "Action Plan to improve SPS Capacity in Cambodia". This Action Plan was supported by a separate report entitled "Evaluation of Laboratory Capacities in Cambodia" and three summary technical reports on phytosanitary issues, fisheries and laboratories. The project was completed in July 2010, and the Action Plan was submitted in the same month to the Senior Minister/Minister of Commerce in Cambodia by letter from the FAO Representative in Cambodia. In January 2011 His Excellency Cham Prasidh, Minister of Commerce responded to FAO, commending the report and endorsing the SPS Action Plan "for immediate action to operationalize [it]".

2.3 Related / Subsequent developments

19. In March 2010, the World Bank office in Phnom Penh asked the leader of the STDF/PG/246 team to bring forward an expression of interest on behalf of FAO on an approach to implementation of the Action Plan report. The draft proposal subsequently presented envisaged funding by the Trade Development Support Program; under it FAO would have acted as single-source program manager and used its staff to prepare detailed designs for projects. The proposal was not progressed so far as the writer is aware: email traffic indicates that the World Bank office saw difficulty in reconciling the proposed role of FAO with the way in which the TDSP was set up to develop and approve funding of activities.

20. In March 2011 I was commissioned by the World Bank to visit Cambodia and, inter alia, prepare a presentation on the STDF action plan to the Sub-Steering Committee on Trade Development and Trade Related Investment.⁴ The presentation was to canvass the extent to which the STDF action plan was appropriate for Cambodia, how it could be implemented, what specific activities (that were not currently in progress) should be implemented that could lead to results as defined by the TDSP Project Development Objectives, and what would be the TORs and budgets for these activities. In my presentation to the Sub-Steering Committee I said, by way of summary, that in my professional opinion STDF/PG/246's Action Plan "provides a sound basis for a coherent approach to SPS capacity building by development partners". During the same mission for the World Bank I prepared several detailed project proposals, in the fields of fisheries administration and meat sanitary processing. Each of these proposals significantly overlapped action items listed in the STDF/PG/246 Action Plan.

⁴ The Sub-Steering Committee on Trade Development and Trade-Related Investment is chaired by the Minister of Commerce. The Committee is responsible for overall, strategic oversight of Cambodia's trade integration process, facilitated through the Trade SWAp framework. The government introduced the Trade Sector-Wide Approach (Trade SWAp) to consolidate its ownership of Aid for Trade, strengthen the effectiveness of development partners' trade-related technical assistance, and move forward the country's integration in the global economy. The Trade SWAp thus provides the mechanism to implement Cambodia's Trade Integration Strategy formulated in 2007.

2.4 Objectives of the evaluation

21. The objectives of the evaluation are to:

- verify whether the project achieved the objectives set out in the project document;
- identify if the project has achieved any of the higher level objectives of the Facility, e.g. a measurable impact on market access, an improved domestic, and where applicable regional, SPS situation, and poverty reduction;
- identify key lessons learned for the benefit of both recipients and donors and for future STDF programme development.

2.5 Independence of the evaluator

22. The several ways in which I was associated with the preparation of the STDF/PG/246 Action Plan and its subsequent consideration by the Royal Government of Cambodia and its development partners are described above. This evaluation of the project is given independently and objectively on the basis of my professional knowledge and experience of SPS capacity-building and of SPS issues in Cambodia in particular.

3 METHODOLOGY

Survey methodology

23. A list of possible primary respondents was compiled, including members of the steering committee appointed for the project, individuals working for the development partners in Cambodia who were known to have had some involvement with STDF/PG/246, and the team leader of the project. Several other persons known to the writer who might have relevant information or views were also contacted. All those who were contacted for the purposes of this review are listed in Annex 2. For each group of respondents a set of questions was compiled, based on the five criteria listed in Section 4 below and the issues raised in Section 5 (lessons learned, etc.). The questions are at Annex 3.

24. All those listed were requested to provide written responses to an appropriate set of questions, and replies received were followed up in a telephone/Skype call to clarify any points and obtain additional perspectives. As anticipated, the majority of the proposed respondents did not provide written responses to the questionnaire, presumably by reason of other demands upon their time, lack of recall of the events of three years ago, lack of facility in the English language, and so forth.

25. All documents referred by the STDF secretariat were examined, as well as relevant documents already in possession of the reviewer including comparable SPS capacity-building action plans, SPS technical assistance project descriptions and plans for Cambodia, project reports, and e-mails dating from 2009-2011.

26. Particularly helpful information was provided by key officials of the World Bank (Julian Clarke) and the European Union delegation (Seth Van Doorn) in Phnom Penh, as well as Kees van der Meer (consultant to STDF and ADB) and the STDF/PG/246 team leader (Mike Robson).

4 FINDINGS AND ANALYSIS

4.1 Relevance

27. In least developed countries in particular there are typically many unmet needs for capacity building in the areas of food safety and animal and plant health. There are also, typically, a number of willing development partners offering resources that can be used to meet at least some of those needs. For countries that have recently joined or that plan to accede to the WTO there are additional pressures to conform with WTO Members' obligations under the SPS Agreement. In such circumstances SPS capacity-building requires proper prioritisation and sequencing of projects. The need for planning is reinforced by factors such as the length and complexity of the chain along which food must pass from farm to table (or export) and the interrelationship of many components making up effective SPS systems operated by government. As well, investment in capacity-building within the public sector must take into account the requirements of the private sector. There is ample evidence in many developing countries of wasteful investment of resources in

technical assistance because of a lack of prioritisation, consultation, coordination, coherence, and follow-through. Cambodia is one of the countries that fits this description.

28. A decade ago several of the major international bodies concerned with capacity-building especially in the field of SPS, the World Bank in particular, came to the conclusion that SPS capacity-building in developing countries would be considerably facilitated by the preparation of action plans that would set out a comprehensive, rational approach to the task, thereby providing a framework within which both donors and beneficiaries could sensibly work out the menu of highest priority projects to be implemented in successive periods. The World Bank funded the development of action plans along these lines in both Vietnam and Lao PDR.

29. In the opinion of the writer, then and now, it was certainly appropriate to use the concept of the comprehensive SPS action plan in Cambodia to meet the clearly evident need for greater focus on and coherence in capacity-building. Among the benefits would be documentation of possible actions in a way that would allow the Royal Government of Cambodia to consider more effectively where its priorities lay, having regard to the needs of the Cambodian people and industry. At the same time donors would be given a menu of possible actions on the basis of which specific implementation projects could be designed. The World Bank in Phnom Penh, and the EU Delegation (the major donor), both believed that the concept fitted well with the Trade Sector-Wide Approach that was (and is) being managed by the Ministry of Commerce. In addition, in comments submitted for this review other experienced international experts supported the concept of a national capacity-building action plan that could serve as a menu from which interested donors could select priority projects in correct sequence for implementation. Moreover, it appeared timely for STDF/PG/246 to try to make a plan on these lines for Cambodia since the Trade Development Support Program (TDSP), a major fund, was willing to invest in the area.

30. However no initiative on the part of development partners can guarantee that an action plan will be accepted by local Ministers, officials and their agencies as a valuable tool and used accordingly. The leader of the STDF/PG/246 team has commented that, notwithstanding the creation of the National SPS Taskforce as the local liaison and steering group for the project, "the government engagement was rather limited at higher levels" and at one stage the FAO wrote to request confirmation that the project really was wanted by the Cambodian administration. This lack of effective engagement was confirmed, apparently, by the failure of the presentation of the report to the Sub-steering Committee on Trade Development and Trade-related Investment to stimulate any consequential action.

4.2 Effectiveness

31. The main stated objective of STDF/PG/246 was to prepare an SPS Action Plan for Cambodia in the form of a 60-page (plus annexes) draft strategy document for submission to the RGC and other stakeholders. The document would discuss policy options and propose priorities for public sector policies, regulatory and institutional adjustments, and public and private investments for managing sanitary and phytosanitary measures. The draft strategy was not to cover biotechnology and biodiversity. According to the STDF/PG/246 report, as originally framed the project would only cover domestic food safety, animal health and plant health issues that are related to trade, but following representations by Cambodian Government representatives, and by agreement with the STDF Secretariat, the primary focus on exports was relaxed somewhat as the study progressed to take into account more fully domestic aspects of food safety and biosecurity.

32. The project proposal spelled out in considerable detail the way in which the STDF/PG/246 report was to be constructed, both as to process and content. A comparison of the detailed project specifications with the STDF/PG/246 report shows some differences:

- The executive summary and the introduction of the Action Plan occupy 2 pages, not 10 as anticipated.
- "Capacity for SPS management", comprising a number of components in the original outline, is not dealt with directly but incidentally to other material, and at only a small fraction of the expected length.
- On the other hand, material dealing with the "recommended Action Plan", about 28 pages in length, is 40 per cent longer than expected in the terms of reference.
- Overall costs and benefits, funding sources, and risks in relation to the Action Plan are listed for consideration in the ToR but are essentially not dealt with in the report.

- Overall, the Action Plan is about 15 pages shorter than the expected 60 pages (plus annexes).

33. In passing it might be mentioned that there are several items included in the ToR's long list of matters to be covered that seem inappropriate. One is the requirement for "an assessment of sector and inter-sector priorities for strengthening SPS management capacities [presumably meaning the ability of Cambodian institutions to influence food safety and biosecurity outcomes] based on policy imperatives [?] and cost-benefit analysis [use of which is problematic even in expertise- and data-rich countries]". Another is the suggestion that a priority should be "gaining mutual recognition in conformity assessment, surveillance, laboratory analysis, etc." when in reality there is very little scope for application of the mutual recognition concept under the principles of the SPS Agreement.

34. The deviations from the expected composition of the report that are listed here may not be particularly significant, for a range of reasons. The report may be short but it presents information and opinions in a clear, pithy and direct style. Much of the information specified for inclusion under "Capacity for SPS management" had recently been collected and presented by the ADB's GMS trade facilitation project at the time STDF/PG/246 was in the field. None of the individuals who have responded to requests for comment for the present review have suggested that the report omits important data, nor have they questioned the quality of analysis. It is not known whether any of these deviations from the report plan were sanctioned by the STDF secretariat in the course of the preparation of the report or later when the draft was submitted for acceptance, but in any event the draft was accepted.

35. The immediate objective of the project, to produce an SPS capacity-building action plan, was achieved. The report contains such a plan, dealing firstly with key strategic decisions and secondly with specific initiatives to strengthen current functions. Several comments can be made on the plan.

- The plan contains a substantial agenda of proposed actions which, if implemented effectively, would make a major improvement to Cambodia's SPS capability. These interventions would generally complement the activities planned to be undertaken by the ADB's GMS project. They are grouped thematically, and ranked (by category) for priority and cost, consistent with the ToR.
- The discussion of key strategic decisions is focused around institutional issues, including the merits of creating new arrangements to group biosecurity functions more closely and to consolidate food safety functions in a stand-alone agency. The analysis is logical and sensible. The report offers no specific directions to resolve the well-known dis-functionality of the existing Ministerial arrangements, but proposes instead that donors support the creation of a small, high-level group of officials from the relevant Ministries to study options and present recommendations to a committee of their Ministers. Independent observers of the Cambodian situation (and, in private, many senior Cambodian Government officials) agree that inter-Ministry rivalry over opportunities to raise informal revenues under the guise of legitimate regulatory activity is the major factor confounding the achievement of more efficient and effective control of biosecurity and food safety. The probability that senior officials could agree on rationalisation of Ministerial roles and responsibilities and that this agreement would then be promptly put into practice must be assessed as low. The probability that Ministers might agree may not be much higher. This judgement is supported by the reported lack of progress to date in effective implementation of Inter-Ministerial Prakas No. 868 (October 2010)⁵ on roles and responsibilities for food safety. But if the probability of success is low should the attempt not be made? Bringing forward a proposal like this at least gives donors another opportunity to make representations to the government about the need for it to act in a manner that will be conducive to successful capacity-building. Potentially those representations could be made at a level of government above the directly interested Ministers.
- There are other key strategic issues that are not adequately addressed in the report. The *Law on the Quality and Safety of Products and Services* (2000), held up by the Ministry of Commerce as the primary basis for food control in Cambodia, provides for the

⁵ The concept of such a government order, and a first draft of it, was produced by the author of this review under the EU MULTRAP project in 2005-06. Several years later this issue was again taken up by a donor, under the ADB's Cambodia Sanitary and Phytosanitary Standards Management Systems Project (CSPSMS), culminating in the adoption of the inter-Ministerial prakas in October 2010. The STDF/PG/246 report emphasizes (para. 91) the importance of this work.

establishment of food norms in sub-decrees or other implementing regulations, but the continuing absence of mandatory food standards in Cambodia represents a glaring gap in food safety infrastructure. Donor efforts to remedy this deficiency in 2006 (EU MULTRAP⁶) and 2010 (FAO⁷) proved ineffective in the face of internal disagreements between Ministries over the appropriate mechanism for formulation and adoption of food norms. The STDF Action Plan mentions food standards only very briefly, and makes no proposal of an action to obtain a proper body of mandatory official requirements.

- Many experts would agree that Cambodia needs a new food law that would, inter alia, excise food control from under the scope of the *Law on the Quality and Safety of Products and Services*. The Ministry of Commerce in particular opposes this because of the implicit threat to its authority and range of responsibilities; so would the Ministry of Industry, Mines and Energy if such a law would take over responsibility for the making of food standards from the *Standards Law* (2004) which it administers. The legal framework for SPS control is a key strategic issue, but it is not adequately addressed in the STDF/PG/246 report either under that heading or as an action item or items.

36. Of greater significance is whether the recommendations of the Action Plan will be implemented. It is not entirely clear whether the Royal Government of Cambodia accepted its findings and recommendations. As mentioned above, in January 2011 His Excellency Senior Minister Cham Prasidh, Minister of Commerce, to whom FAO had formally submitted the Action Plan, responded in a letter by commending the report and endorsing the SPS Action Plan “for immediate action to operationalize [it]”. Several months later the report was submitted to the Sub-Steering Committee on Trade Development and Trade Related Investment, chaired by Minister Prasidh, but on this occasion he did not move to have the Action Plan endorsed by the Committee.

37. Despite Minister Prasidh’s endorsement, not much has been done by way of implementation. The first step towards that goal is the detailed design of actual capacity-building projects, based on STDF/PG/246 recommended actions. To the reviewer’s knowledge, only two projects have been designed referring to the STDF report as one source of guidance, and those were developed by the present reviewer under contract to the World Bank in March 2011⁸. (The STDF/PG/246 team leader recalls that in course of compiling the report there was very good cooperation with the ADB’s Cambodia Sanitary and Phytosanitary Management Systems Project (CSPSMSP) project to the point of planning a number of post-project activities specifically on pesticide residue testing on fresh produce in markets. This may also count as an output of STDF/PG/246.)

38. There are various reasons, summarized below, that may explain the limited progress to date in the implementation of the Action Plan produced under STDF/PG/246.

39. One possible reason why development partners and local counterparts in Cambodia seem, for the time being at least, not to be interested in taking up the STDF/PG/246 recommendations may be that the ADB GMS project on SPS-related trade facilitation currently being implemented is very large and has, in a sense, temporarily satisfied demand for SPS capacity-building initiatives. A World Bank official says that once ADB began focusing intensively on the SPS sector, the Government decided to direct its energies elsewhere.

40. Another possible explanation is that donors did not find the proposed action plan useful in guiding the allocation of their resources. One commentator has suggested that the STDF/PG/246 report would have been more useful if it had sought to make itself more directly responsive to the needs of the Trade Sector-Wide Approach (Trade SWAp) that was being implemented in Cambodia by the major development partners (especially World Bank, EU, UNDP and UNCTAD). To do this the project would have:

- engaged better with local development partners through the donors’ technical working groups and senior Ministry officials;
- brought forward clear recommendations for ground level activities (but not fully worked up project proposals) that could resolve the issues mentioned in the report.

⁶ D. Gascoine, consultant

⁷ S. Chaudhary, consultant

⁸ No action has yet been taken to implement these projects under the Trade Development Support Program, although in his comments for this review a representative of the World Bank in Cambodia has stated that “the projects may see the light of day after the replenishment and extension of the program this year”.

41. Another commentator has said that lack of coordination between donors was “relatively routine” in Cambodia, and this, overlaid on the notorious difficulties of dealing with the “political economy” of the RGC administration, made efficient and effective delivery of technical assistance highly problematic. The difficulty that donors have in working together constrained the usefulness of STDF/PG/246. The fact that the STDF project was implemented by one development agency (FAO) for follow-up by a number of donors may have reduced the likelihood that it would be taken up quickly, if at all. Some donors have difficulty accepting the advice of other donors; and there are time frame and format differences between donors. For these reasons it would be preferable to combine the project to make an action plan and the money for implementation up front so that there would be commitment to implementation. A project like STDF/PG/246 faced the prospect that once completed it would lack for ownership by key funding agencies, and this had proved to be the case.

42. Lastly, but not least, insufficient national interest and commitment for this project (and to actively address challenges identified in the resulting action plan) is considered as a key issue that seriously constrained implementation of the action plan. According to one commentator, “the lack of impact by STDF/PG/246 on the policy agenda in Cambodia was not unique: many efforts in Cambodia fail to produce implementable projects”. This he attributed in part to the assumption by those responsible for the report “that Government would organize the follow-up, prepare strategy and formulate investment proposals”.

43. The few responses from Cambodian officials to the request to make input to this review were rather general but uniformly supportive of the quality and value of the Action Plan produced under STDF/PG/246. None offered any indication as to why the Cambodian Government had not pressed for implementation of the Action Plan.

44. It is a common experience in providing technical assistance in least-developed countries that it is difficult to interest local counterparts in a systematic approach to capacity-building, especially if support from donors comes with a contingent expectation that the government of the host country should take action to rationalize administrative arrangements and amend programs in a way that reduces opportunities to gather informal rents (for example by introducing a risk-based approach to food safety or biosecurity inspections). It is not uncommon for individual project proposals offered by donors to be viewed through the prism of opportunities for private gain in terms of money or prestige. Whether this factor was at play in Cambodia in relation to the response by the Government to STDF/PG/246 cannot be determined, but it cannot be ruled out. To take one example, STDF/PG/246 addresses the issue of national analytical laboratory capacity. It recommends a strong regime of coordination between the various government laboratories in the interests of efficiency and excellence (a Laboratory Action Plan), without which further laboratory strengthening with external assistance would not be a sound investment. The recommendation is based on observations such as:

“It is unlikely that the volume of residue tests to be performed in Cambodia would justify more than one laboratory being equipped with the more expensive equipment required to perform GC MS and LC MS tests to the selectivity and sensitivities required by some markets.”

45. In the same time frame as STDF/PG/246 was being carried out, however, the Royal Government of Cambodia provided some US\$2 million worth of sophisticated laboratory equipment to the Ministry of Commerce’s inspection arm Camcontrol, to be located in a new, purpose-built laboratory. If ultimately made fully operational – not a foregone conclusion – this additional laboratory capacity would represent a massive duplication of capacity either existing or planned in other Ministries. At the same time ADB was supporting the upgrading of the Industrial Laboratory Centre of Cambodia (ILCC) in the Ministry of Industry, Mines and Energy (MIME). On past performance it is not credible that the Ministry of Commerce, MIME, the Ministry of Agriculture, Forestry and Fisheries and the Ministry of Health could agree to curtail activity in their own laboratories and farm out work to laboratories in other Ministries, if only for reasons of prestige.

4.3 Efficiency

46. As mentioned above, in response to representations by Cambodian stakeholders, the scope of the project was substantially broadened after commencement to cover SPS issues associated with imports as well as exports. There was no associated increase in budget or time frame. The STDF

Secretariat has confirmed that the report of the STDF/PG/246 project, with its expanded scope, was delivered on time and within budget.

47. The National SPS Taskforce appointed for the project met on seven occasions and reviewed and commented upon intermediate outputs and the requisite consultations with the stakeholders were held. One commentator from the donor community said that he did not recall any deficiencies in the coordination processes. Another suggested that there should have been additional consultations with the Private Sector Technical Working Group (the donors working on private sector development) and the Agriculture Technical Working Group (donors supporting agricultural development) to supplement the coordination achieved through informal contacts with the World Bank, ADB and EU Delegation. It is difficult to assess whether additional consultations on these lines would have had significant benefit in terms of implementation of the report.

4.4 Impact

48. Prima facie a project that has produced an action plan that has not been implemented will have had very little impact on events in Cambodia, either at the level of SPS capacity or in terms of higher-level objectives such as increased international market access, improved food safety and biosecurity, poverty reduction, and so forth. None of the stakeholder respondents to requests for input to the present review have said that STDF/PG/246 was in any way influencing or likely to influence their planning for future technical assistance activities or government budgeting. Arguably, the project has nevertheless contributed to increasing awareness of core challenges facing SPS capacity building in Cambodia. But as far as this reviewer is aware, there has been no significant effort made in Cambodia by any of the original supporters of STDF/PG/246, the government or any significant donor to press for the implementation of STDF/PG/246's recommended action plan. An effort by FAO to get World Bank or TDSP support for a follow-on project to develop specific, detailed project designs failed.⁹ For whatever reason (lack of ownership, other priorities, etc.) no-one else in the donor community has made an attempt to progress implementation.

49. The particular reasons that underlie the apparent lack of interest by the Royal Government of Cambodia in follow-up action on STDF/PG/246 are obscure. Informally senior RGC officials have stated that it would be highly desirable to establish an SPS coordinating mechanism within the administration, and presumably a coherent plan of action to build SPS capacity would be extremely useful to the operators of such a mechanism if it were to be created. But in the absence of a coordinating mechanism it is not surprising that the Action Plan with its broad application across a number of Ministerial portfolios lacks a local champion or champions.

4.5 Sustainability

50. Given the lack of impact by STDF/PG/246 over the past three years, it appears that there have been no continuing benefits so far realised. That being said, STDF/PG/246 is by no means the only technical assistance project in Cambodia that has proved to be an orphan at birth. However not all projects that fail to lead to further, prompt action pass permanently into history: the writer was personally responsible for at least two SPS-related projects in Cambodia whose recommendations led to significant consequential action only when they were taken up again after the elapse of some years. It would be premature to write STDF/PG/246 off as a failure just yet. It is not impossible that some donor might over the next several years again see a priority for effort in the SPS field and turn to the Action Plan for guidance, but at present the probability of that happening can only be assessed as low.

⁹ As mentioned above, in 2010 the World Bank office in Phnom Penh asked the leader of the STDF/PG/246 team to bring forward an expression of interest on behalf of FAO on an approach to implementation of the Action Plan report. The draft proposal subsequently presented envisaged funding by the Trade Development Support Program; under it FAO would have acted as single-source program manager and used its staff to prepare detailed designs for projects. It appears that the World Bank office then saw difficulty in reconciling the proposed role of FAO with the way in which the TDSP was set up to develop and approve funding of activities.

5 CONCLUSIONS, RECOMMENDATIONS AND LESSONS LEARNED

5.1 Conclusions

51. The merit of STDF/PG/246 as an investment by the Standards and Trade Development Facility depended on a number of assumptions. The main ones might be summarised as:

- the terms of reference were appropriate;
- the project would be given adequate funding and time;
- the project would be competently implemented, leading to a useful report;
- the Cambodian Government would be interested in implementing the action plan prepared under the project;
- there would be a donor or donors interested in funding projects flowing from the action plan.

52. At least when originally conceived, the project's ToR were appropriate. The project as proposed was judged by key donor officials to be highly relevant. The resourcing of the project was, if not generous, at least adequate to meet its stated goals, as measured against the yardstick of similar projects carried out by the World Bank. As to the third assumption, arguably the report and the action plan could have been somewhat fuller – richer in substance and detail – but overall the project's output was sensible, robust, and in the context of the situation in Cambodia certainly useful. Possibly the action plan would have been more likely to be implemented if it had presented more specific proposals for priority individual projects, aligned with themes identified in broader-scope national development plans, but this was not required by the ToR nor provided for in the project budget.

53. However all five assumptions had to be met for the project to be judged a success. In the outcome, three years after the submission of the project report, neither of the last two assumptions has proved to be valid. It is not impossible that the report will be drawn upon to shape SPS capacity-building activity in Cambodia in the future, but the chance of this happening diminishes with the passage of time. At the time the project was approved it was reasonable to expect that the Royal Government of Cambodia would be interested in implementing the action plan provided that donor support was forthcoming; and several development partners had shown an active interest in SPS capacity-building across a range of topics. In the event, however, when the STDF/PG/246 action plan became available the Cambodian Government was not so interested that it was prepared to push strongly for the conversion of its recommendations into fundable projects and to pursue that funding through the readily available facility of the TDSP/Trade SWAP. Donors had also cooled in their enthusiasm for following an approach to SPS capacity-building based on a coherent, prioritised plan.

54. The ADB's GMS trade facilitation project is given credit by various commentators for having a not insignificant influence on this outcome. There is a view amongst the development partners (donors) that the ADB GMS project is so large it has prompted the Cambodian Government to turn away from seeking additional technical assistance for SPS capacity-building. It is also fair to say that the ADB's expenditure plans were developed on the basis of a rather thorough evaluation of capacity-building needs within certain SPS areas of interest, and inevitably this evaluation overlapped the work of STDF/PG/246 in the same sphere.

5.2 Recommendations in relation to the STDF/PG/246 Action Plan

55. On this reading of the situation, the development of the SPS capacity-building action plan for Cambodia was a useful concept, effectively implemented, but the value of the output was diminished to some extent by pre-emption of the field by a large ADB project and to some extent by changed priorities on the part of the Cambodian Government and key donors. The opinion of this reviewer is that the action plan remains relevant to the needs of Cambodia; but there is only a low probability that anything significant will come of STDF/PG/246 without a strong push to canvass its merits amongst potential beneficiaries in relevant RGC Ministries and simultaneously to seek out donors who have resources available or soon to be available to invest in projects.

56. It is undesirable that the use made of the outputs of STDF projects should be left entirely to the vagaries of national policies and donor initiative, but it is a matter for the STDF partners and/or secretariat to determine whether and how they should take positive steps to catalyse

action. As is so frequently the case, the missing link is project design. One strategy would be for the STDF Secretariat to seek out interested parties in Cambodia amongst the relevant ministries/agencies and encourage them to seek STDF project development grants based on priority elements of the action plan. Another would be to canvass the STDF partner organizations to find one or more willing to put resources into project development after due consultation with lead SPS agencies in Phnom Penh.

5.3 Lessons learned for reference in future STDF activities

57. The rationale for framing a national action plan for SPS capacity-building is to enable the most efficient use of available resources by proper prioritization and sequencing of individual projects aimed at strengthening biosecurity and food safety and boosting export potential. However, given the formidable obstacles to achievement of an orderly approach to capacity-building, should broad-scope action planning be pursued? If there were another application for STDF funding of a project such as STDF/PG/246, should it be supported, and under what conditions?¹⁰ In particular, is it worthwhile to attempt to make coherent SPS action plans without a prior commitment on both sides of the development partnership (i.e. among concerned national authorities and relevant development partners and donors) to their implementation?

58. It is evident that the relevant authorities in a particular country are unlikely to pursue collectively an orderly, coherent, prioritized approach to national SPS capacity-building unless they are given the necessary tools and resources. Especially in least developed countries, agencies may be more interested in projects that will increase local prestige or give some economic advantage to them in a corporate sense and/or to their administrators individually than in meeting more urgent needs. In any event the agencies often lack the capacity to articulate and argue for related technical assistance. On the supply side, donors may lack the technical capacity to judge the best uses for the funds they have available; they find it difficult to resist the bias of their local clients towards funding acquisition of physical assets - laboratories, for example - which confer prestige on the recipients at the same time as they manifest the donor's beneficence; and there is too great a readiness to support requests for training - of technical staff but not managers - where outputs (not outcomes) can easily be counted but benefits accrue more to the individual participants than to their organizations and functions. Direct coordination of donor activities through local liaison mechanisms is attempted in many countries, but does not always succeed in eliminating duplication or rivalry (especially where actions are driven from the headquarters or regional offices).

59. The formulation of a national action plan is a process that engages all of the key SPS-related agencies in identifying and prioritizing capacity-building projects and that leads logically to a programmatic approach to implementation. It enables the rationale of each project to be seen from a national perspective. It presents a menu of good potential projects to the development partners. It offers a path around the problems identified in the preceding paragraph. The issue is not, therefore, with the utility of the action plan as a tool for organizing technical assistance for sound uses, but rather how to have this utility recognised by the partners and acted upon.

60. One approach would be to provide STDF support for broad-scope action planning projects only when they are clearly and strongly backed by all of the relevant national agencies and when there is firm commitment for specific follow up action by a donor or donors. Unfortunately, such favourable circumstances are likely to be rare, and there will always be the risk (as in the case of STDF/PG/246) that the interest of local agencies and/or potential donors may weaken over the course of the project. Since STDF is one of the few organizations that is positioned to initiate activities, like action planning, that can facilitate more rational, less piecemeal capacity building in the SPS field, it should not set the bar so high.

61. Certainly the STDF partners need to be pro-active in catalysing and sustaining donor interest in using a coherent national action plan as the basis for SPS capacity building. Consultation with donors before, during and after the development of the action plan must be focused on encouraging donors to build the plan into their forward budgeting for technical assistance so that funds are available as soon as the plan is ready. The meshing of action planning and donor budgeting will require that when the action plan is available it is accompanied by detailed specifications for a number of specific project investments suitable for donor funding, these projects being the most immediate and highest priorities identified in the plan. If the project

¹⁰ The STDF Secretariat has advised that no such application has been received in the past three years.

designs are not ready simultaneously with the plan, donor interest and the relevance of the plan will progressively fade with the passage of time. The terms of reference and budget for the STDF-funded action planning project must therefore cover the analytical phase, the formulation of the plan, the design of the initial implementing projects, and the consultation activities.

62. Secondly, the means must be found to reinforce and sustain local interest in the project, so that there is strong prospect that the beneficiary will want to act on the plan once produced. Part of the solution will be to find an approach to circumventing the adverse effects of inter-Ministry tensions. The formation of a multi-agency advisory body for the project, as employed in Cambodia for STDF/PG/246, is an obvious option, but may not prove adequate to the task if one of the participants is dominant. An alternative is to have the local counterpart organization be one that has a coordinating role within the national government, rather than a line ministry or agency. More importantly, the terms of reference for the project should explicitly require activities by the project team to engage the attention and interest of the local Ministries/agencies. Obviously this will be contingent on, more than anything else, a commitment by a donor or donors to fund to a significant amount at least some important capacity-building projects included in the Action Plan. It would also be valuable for STDF to seek a prior commitment from the host government at a sufficiently senior level to the procedure that will be followed domestically to consider, evaluate and act upon the action plan once it has been completed. A government is unlikely to go so far as to commit to implementation of an action plan sight unseen, however desirable that might be from the perspective of ensuring value from STDF's investment, but it is not unreasonable to expect a commitment by government to giving proper formal consideration to a proposed action plan.

63. As a caveat, in the event that (as occurred in Cambodia) another donor demonstrates an intention to initiate a parallel action planning project, with significant budget, in the same country and this donor cannot be persuaded to proceed in a coordinated way, consideration should be given to delaying or cancelling the STDF project.

ANNEX 1

STDF/PG/246 TERMS OF REFERENCE (EXCERPT)

Cambodia has limited human, financial and technical resources, and it faces many pressures to upgrade its SPS management capacity. It is WTO member, but it still faces difficulties in its compliance with membership requirements. As a member of ASEAN and GMS it has to narrow its capacity gaps with more developed members and neighbours, especially Thailand, Vietnam and China. The support it has received for SPS capacity building has been relatively small, in part because of the complex institutional roles of agencies involved. Unlike Lao PDR and Vietnam, the many needs of Cambodia for capacity building have so far not been brought together in a comprehensive SPS capacity building strategy and action plan. The Diagnostic Trade Integration Study of 2007 touched upon SPS but with far less resources than were available for the SPS Action Plans of Lao PDR and Vietnam.

The SPS Strategy and Action Plan

This TOR provides the framework for preparing such an SPS Action Plan for Cambodia. The output of the study is a 60 page draft strategy document with Action Plan supported by annexes that will be submitted to the Government and other stakeholders. The study will bring together information on agro-food trade, food safety, plant and animal health, compliance issues, and capacities. It will discuss policy options and propose priorities for public sector policies, regulatory and institutional adjustments, and public and private investments for managing sanitary and phytosanitary measures. The scope of work, sources and organization of the study are detailed in Annex I.

Capacity building and ownership

The preparation of the strategy will be carried out in a participatory process with in-depth consultations of all public and private sector stakeholders individually and through three consultative workshops. In particular, attention will be given to improve the complex institutional situation. The aim of the consultations is twofold: it is capacity building in itself while creating ownership.

Methodology

The strategy will be based on rigorous stock taking by a specialist team, including relevant expertise in institutional economics, food safety, veterinary and phytosanitary fields. The specialist team will make use of available technical evaluations made by FAO, IPPC, and OIE and other sources for assessing capacities. It will interview public and private stakeholders and its report will discuss all main SPS issues brought up by stakeholders.

Limitations

The project will not cover biotechnology and biodiversity. The project will only cover domestic food safety, animal health and plant health issues that are related to trade. Since there is a program for HPAI with its own finance and decision making mechanisms, limited attention will be given to HPAI, though the project will take into account the possible broader use of the capacities created in the areas of animal health.

Project Organization

Upon approval by the Government of Cambodia, represented by the Ministries of Commerce; Agriculture, Forestry and Fisheries; Health; and Industry, Mines and Energy, a high level guidance group will be formed, with contact points for each of the ministries and a general coordinator.

STDF will, in consultation with the donor and international agencies in Phnom Penh who are involved in SPS capacity building, appoint an international organization with local presence as the facilitator for the study. See Annex 1 for details.

Budget

The estimated cost for the project is US\$ 252,000. Details are provided in Annex 2. The study will be funded by STDF. The Government will be responsible for the expenses of the Guidance group, the contact points and the general coordinator.

Time schedule

The project will start in July 2008 and be finished within 12 months after start.

ANNEX 2

LIST OF PERSONS CONTACTED

List of National SPS Taskforce Members

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ANNEX 3

QUESTIONS ASKED OF RESPONDENTS

Questions for SPS-related agencies in Cambodia

How was your organisation engaged in the conduct of the STDF project, by means of prior consultation, requests for input, sharing of and invitation to comment on drafts and preliminary conclusions and recommendations, etc.? Could this aspect have been handled better?

How relevant were the objectives of STDF/PG/246 to capacity-building in relation to the SPS responsibilities of your agency? How relevant to the development needs of Cambodia?

In your opinion, does the STDF/PG/246 report properly identify the key SPS development/capacity-building needs within the area of responsibility of your agency? Is the analytical basis of the report's recommendations sound? Do you agree with the priorities assigned to the various initiatives identified? What other needs should have been addressed?

Are you aware of any ways in which the STDF/PG/246 report has been used to influence the path of SPS capacity-building in Cambodia? Has the report been drawn upon as a source of guidance for SPS technical assistance projects? Do you expect that it will be of continuing value in this regard?

What criticisms, if any, would you make of the STDF/PG/246 outputs? What is your assessment overall of the quality and utility of the STDF/PG/246 report (including its appendices)?¹¹ How could its quality/utility have been improved?

What do you think are the key lessons to be learned from STDF/PG/246?

Would it be useful to update the STDF/PG/246 report in, say, two years' time?

Questions for development partners:

How was your organisation engaged in the conduct of the STDF project, by means of prior consultation, requests for input, sharing of and invitation to comment on drafts and preliminary conclusions and recommendations, etc.? Could this aspect have been handled better?

How relevant were the objectives of STDF/PG/246 to the development needs of Cambodia?

What are/have been the main SPS-related activities of your organisation since 2010 to which STDF/PG/246 is relevant? How useful has STDF/PG/246 been in shaping or informing these activities? Do you expect that the STDF/PG/246 report will be of continuing assistance in the future and, if so, how?

Apart from this, do you have information or an opinion on how useful the STDF/PG/246 project has been to development partners in Cambodia?

What criticisms, if any, would you make of the STDF/PG/246 outputs? What is your assessment overall of the quality and utility of the STDF/PG/246 report (including its appendices)? How would you rate it by comparison with similar projects that you are familiar with? How could its quality/utility have been improved?

What do you think are the key lessons to be learned from STDF/PG/246?

Would it be useful to update the STDF/PG/246 report in, say, two years' time?

Questions for project implementers:

Have you been asked to provide clarifications and/or additional information in relation to the STDF/PG/246 project since the dissemination of the report? Could you identify any stakeholders

¹¹ Respondents will be prompted to provide a rating on a scale of 10, as well as a qualitative response.

who have shown particular interest?

What feedback, if any, have you received on the relevance, quality and usefulness of the STDF/PG/246 report? Are you aware of any ways in which the project has been especially valuable/influential?

Were significant difficulties encountered in the efficient conduct of the project and preparation of the report?

Is there any aspect of the report that you believe should/could have been strengthened, having regard to its relevance, impact and sustainability? What were the impediments that prevented such improvement?

Is there anyone else, besides those listed, whom you believe should be consulted in the course of this review?

What do you think are the key lessons to be learned from STDF/PG/246?