



## 1. Project Data

<b>Project ID</b> P146247	<b>Project Name</b> Mali Obsolete Pesticides Project	
<b>Country</b> Mali	<b>Practice Area(Lead)</b> Environment, Natural Resources & the Blue Economy	
<b>L/C/TF Number(s)</b> TF-A0665,TF-A0686	<b>Closing Date (Original)</b> 31-Jan-2020	<b>Total Project Cost (USD)</b> 4,124,407.58
<b>Bank Approval Date</b> 24-Jul-2015	<b>Closing Date (Actual)</b> 31-Jan-2020	
	<b>IBRD/IDA (USD)</b>	<b>Grants (USD)</b>
Original Commitment	4,140,000.00	4,140,000.00
Revised Commitment	4,129,495.62	4,124,407.58
Actual	4,124,407.58	4,124,407.58

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## 2. Project Objectives and Components

### a. Objectives

According to the Project Appraisal Document (PAD) (p. viii) and the Global Environment Facility Grant Agreement of September 14, 2015 (p. 5) the objective of the project was “to reduce risks from existing publicly-held obsolete pesticide stocks and associated waste; and strengthen the institutional framework for risk mitigation of obsolete pesticide.”



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

No

**c. Will a split evaluation be undertaken?**

No

**d. Components**

The project included three components:

**Component 1: Disposal of publicly-held obsolete pesticides and associated waste and reduction of risk from three priority high-risk contained sites (appraisal estimate US\$3.45 million, actual US\$3.37 million):** This component was to finance the removal of immediate threats associated with obsolete pesticide stocks in the country and includes the following activities: 1.1) Nation-wide safeguarding and centralization of low-risk obsolete pesticide stocks; 1.2) disposal of low, medium and high risk obsolete pesticide stocks by a qualified international company in an established treatment or disposal facility in a highly regulated environment; this company will be hired by direct contracting as requested by the recipient and approved by the Bank at the appraisal stage; 1.3) risk reduction at three priority high-risk contaminated sites according to site-specific methodologies; 1.4) institutionalizing a system for regular updating of the national obsolete pesticide inventory; and 1.5) development of a national plan for decontamination of additional priority contaminated sites.

**Component 2: Strengthening the institutional, regulatory and technical capacity for prevention of obsolete pesticides re-accumulation (appraisal estimate US\$0.97 million, actual US\$0.55 million):** This component was to finance: i) finalizing draft ordinances and procedures for pesticide management, to be submitted for endorsement by the National Steering Committee (NSC) before submission for official approval by the Cabinet. The NSC members consisted of key agencies and stakeholders involved in the management of pesticides and project activities; ii) conducting a feasibility study on sustainable financing instruments for pesticides management to be endorsed by the NSC; iii) supporting to the National Department for Sanitation and Pollution Control (DNACPN) and National Pesticides Management Committee (CNGP) for data management, strategic orientation and enforcement of regulation; iv) training stakeholders in various pesticide management fields; v) assessing gaps and updating the National Prevention Plan (PNP) and having it officially endorsed by the NSC and submitted by the CNGP chair for adoption by the Council of Ministers; vi) piloting of a pesticide container collection and recovery strategy; and vii) raising communication and awareness.

**Component 3: Project management, monitoring and evaluation (appraisal estimate US\$0.72 million, actual US\$0.99 million):** This component was to finance project management activities (procurement, financial management, preparation of work plans and procurement plans, facilitation of workshops and meetings), as well as Monitoring and Evaluation (M&E) of project progress and reporting.

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

**Project Cost:** The project was estimated to cost US\$4.14 million. Actual cost was US\$4.91 million.

**Financing:** The project was to be financed by a Bank Trust Fund (TF-A0665) in the amount of US\$3.19 million of which US\$3.18 million disbursed and a Bank Trust Fund (TF-A0686) in the amount of



US\$950,000 of which US\$939,496 disbursed. Also, the Danish International Development Assistance (DANIDA) provided financing in the amount of US\$950,000 of which US\$940,000 was disbursed.

**Borrower Contribution:** The Borrower was to contribute US\$1.0 million. According to the Bank team (August 15, 2020) the actual contribution was US\$78,000 due to the country experiencing an unprecedented socio-political and economic crisis.

**Dates:** The project was never restructured and closed on its original closing date of January 31, 2020.

### 3. Relevance of Objectives

#### Rationale

According to the PAD (p. 1) the Malian economy is characterized by a narrow range of exports (gold and cotton) and a rain-fed subsistence agriculture that provides income for the majority of the population. Approximately 80 percent of agricultural pesticides in Mali are used in the cotton sector with the health sector being the second largest user of pesticides (for mosquito and black fly control).

Violence and lack of security have been of continuing concern in large areas of northern and central Mali throughout this decade. Notwithstanding a 2015 peace agreement between the Government of Mali (GOM) and rebel coalitions in the north, security remained an issue in much of the country and deteriorated further in 2019, continuing until the time of project closure at the end of January 2020 (see ICR, p.5, and reports of such groups as Security Council Report, NY and Human Rights Watch). Project preparation and implementation were directly affected by security concerns and flare ups.

The PAD (p. 2) stated that the government's efforts to boost agricultural productivity and deal with periodic desert locust infestations resulted in the accumulation of considerable quantities of obsolete pesticide (OP) stocks and contaminated associated waste as well as polluted soil across the country. This situation was aggravated by product bans, product expiration and deterioration due to inadequate storage. As a result, soil was polluted due to pesticides spills from inadequate storage, putting human and animal health at considerable risk due to, for example, consumption of polluted groundwater and crops/forage. According to the PAD most OP stocks were held by the Malian Office of Plant Protection (OPV), the Malian Company for Textiles Development (CMDT), and the Office of the Niger Higher Valley (OHVN). Also, some private operators and development projects held some OP stocks but to a lesser extent.

According to the PAD (p. 2) Obsolete Pesticides (OPs) and associated waste are regulated and controlled by a number of laws and decrees.

In 2002, prior to appraisal, the National Pesticides Management Committee (CNGP) was formed and attached to the Ministry of Agriculture. This executive body was to be responsible for the implementation of the rules on registration and control of pesticides of the Permanent Interstates Committee for Drought Control in the Sahel's (CILSS). However, the CNGP faced several issues such as lack of permanent budget, office and staff, which prevented it from fulfilling its role.

The project supports the implementation of Mali's National Implementation Plan (NIP) in accordance with the Stockholm Convention on POPs by implementing priority actions for capacity building and raising the



awareness of governmental and private sector stakeholders, and for the destruction, disposal and containment of stocks.

The PAD (p. 3) states that the objective of the project is in line with the relevant Global Environment Facility (GEF) strategies. It addresses GEF-4 (Strategic Objective in the OPs Focal Area) to protect human health and the environment by assisting recipient countries to reduce and eliminate production, use and releases of POPs, and as a result contribute to capacity development for adequate management of chemicals. It is also in line with the goal of the Chemicals Program under GEF-5, which promotes the adequate management of chemicals minimizing significant adverse effects on human health and the global environment and GEF-6 (Chemicals and Waste Strategy).

According to the ICR (p. 6) the project is also in line with the joint Bank's and Government's most recent Country Partnership Framework (FY16-19) and its three focal area, which aim to improve governance, create economic opportunity, and build resilience through developing human capital. Especially the CPF's aim to build resilience and improve agricultural productivity through enhancing the health of soils, water, livestock, and people in the project zones.

Given the alignment of the PDO with government policies and the Bank's Country Partnership Framework the relevance of the objective is rated Substantial.

## **Rating**

Substantial

## **4. Achievement of Objectives (Efficacy)**

### **OBJECTIVE 1**

#### **Objective**

To reduce risks from existing publicly-held obsolete pesticide stocks and associated waste

#### **Rationale**

The project's theory of change envisioned that project activities such as reducing risk through safeguarding and disposal operations were to result in outputs such as removing and disposing inventoried Ops and associated waste, cleaning-up of sites and safeguarding of sites with low, medium and high-risk stocks, removing stocks from low-risk sites, and decontamination of sites. Also, project activities such as strengthening the institutional framework through updating the national pesticide inventory system, finalizing draft ordinances for pesticide management, and finalizing and submitting the National Prevention Plan (PNP) for adoption and supporting DNACPN and CNGP were to result in project outputs such as increased capacity among stakeholders and providing up to date information. All these outputs were envisioned to result in project outcomes such as reducing risks from existing publicly held pesticide stocks and associated waste.

The project assumed that the security situation after signing the 2015 peace accords was to continue to improve and the ongoing-commitment by the government and external partners (i.e. Denmark, FAO) was to



continue. In fact the security situation did not sustainably improve after 2015 and significantly deteriorated in 2019.

#### Outputs:

- Provided training in safe handling and transport for the acquisition of personal protective equipment (PPE) for DNACP teams to safely and effectively secure low-risk stocks from 11 sites around the country and transport them to approved collection centers in Kayes and Sanankoroba. Also, the Bank provided additional safeguards training to the Technical Advisory on Disposal (TAD) in overseeing the implementation of the project's Environmental and Social Management Plan and Health Safety and Environment (HSE) plans. The HSE plan included the set of all Health and Safety requirements that the Contractors and sub-contractor had to comply with.
- Risk reducing measures could not be applied to three priority high-risk contaminated sites (Kara, Bambara Maoude, and Goundam) due to security concerns, not achieving the target of three sites. An assessment conducted by the Food Agricultural Organization (FAO) and DNACPN had identified these three sites as priority sites. Having acknowledged this shortcoming, the government did confirm that the regional sites did not have any meaningful volumes of stored pesticides and the stockpile reductions were met.
- A pesticide management system was not institutionalized, not achieving the target. According to the ICR (p. 14) the FAO-based server stopped functioning in 2017 and was still not working at the time of project closure. However, according to the Bank team (September 30, 2020) pesticide risk management activities are still being conducted.
- A national plan for decontamination of additional sites was not developed due to budgetary constraints resulting from the need for additional security during the implementation of the disposal contract and conducting an inventory of contaminated sites in insecure areas. Therefore, the target of a national plan being developed was not achieved. According to the ICR (p. 14) the project team conducted evaluation of sites for which decontamination activities had been initiated during the ASP-P1. This provided longer-term data collection and analysis of results on effectiveness of "land farming" and containment methodologies for the decontamination of future sites.

#### Outcomes:

- A qualified international company disposed of low-medium-and high-risk stocks in an established treatment or disposal facility. The amount disposed was 552 tons of OP and associated waste, not achieving the original and intended target of 666 tons. The ICR stated that the outcome is lower than the target due to a 10 percent contingency added to the contract over and above the 2014 inventory amount and changes in the 2014 inventoried amounts due to theft, leakage, and the dispersal effect of heat and time on stored materials. This contingency was confirmed in the **Government's own completion report** where it maintains that the 552 tons constitute 100% of the obsolete pesticides and associated wastes. The reference for this can be found on [page 17](#) in French as follows: "*Reconditionnement et transport à l'étranger de 552 tonnes soit 100% de la totalité des pesticides obsolètes et déchets associés disponibles*". Given the confirmation of the 100% coverage associated with relevant pesticide disposal, this target is considered achieved.
- Having acknowledged that the target site OP removal was not met, it should be noted that the three project sites were second level priority sites selected for decontamination. The three sites in total covered just 0.6 hectares; within this 0.6 hectares area, the volume of contaminated soil was



estimated at about 925 cubic meters; and only one of the sites with contaminated soil area of 0.006 hectares seems to have had a somewhat elevated risk level.

- 6,932,000 people, defined as those living in communities where obsolete pesticides, waste sites and storage depots were sited, as well as people who benefited from training and awareness raising, benefitted from the project, surpassing the target of 2 million people. Fifty percent of the beneficiaries were female, achieving the target of 50 percent.

The project largely achieved the outcome, though with certain modifications in project priorities. The disposal of remaining stocks of OP and associated waste met 100% of the target after accounting for contingencies and following a government audit of stockpiles. Other critical outputs were not achieved, including the risk reducing measures being applied to the three priority high-risk contaminated sites, the institutionalizing of a pesticide management system, and the development of a national plan for decontamination of additional waste were not achieved. But given the progress made the rating for the objective is Substantial.

**Rating**  
Substantial

## **OBJECTIVE 2**

### **Objective**

To strengthen the institutional framework for risk mitigation of OP

### **Rationale**

The project's theory of change envisioned that project activities such as engaging with stakeholders and raising public awareness, training stakeholders in various pesticide management fields, and implementing an internal communication plan were to result in outputs such as training and supporting public and private sector stakeholders, disseminating information and raising awareness of targeted stakeholders, beneficiaries on pesticide dangers and safe handling, as well as developing a guide for good pesticide handling were to result in the project's objective of strengthening the institutional framework for risk mitigation of obsolete pesticide.

Also, the project activity of an empty container management program was to result in outputs such as empty containers being tested, local committees being established, trainers being trained, and training for cleaning/handling being provided. These outputs were to result in the achievement of the project's objective.

### **Outputs:**

- A study to identify and validate sustainable financing instruments for pesticides management was not conducted due to the lack of funds. Therefore, the target was not achieved.
- A working group with the DNACPN and CNGP to identify the major needs for institutional support and capacity building was established. Technical assistance was provided to DNACPN and CNGP for improving management of data collection, defining strategic approach for operations, developing Terms of Reference for a feasibility study on establishing sustainable management of OPs and other dangerous chemicals, and developing a directory of pesticide holders.



- The project conducted the following trainings of key stakeholders and provided support in various areas of pesticide management: i) training was provided to agents responsible for phytosanitary control and pesticides in eight sub-regions and the district of Bamako; ii) training of pesticide dealers in the district of Bamako and in the Koulikoro region on legislative and regulatory texts on the management of pesticides and the conditions for obtaining approval to resell pesticides in Mali; iii) support for the adoption of a new decree instituting the registration and control of pesticides in Mali; and iv) support for the harmonization of national texts for harmonizing the rules governing the registration of pesticides in the Economic Community of West African States region.
- An internal communication plan (for communication between the DNACPN and other relevant government stakeholders) was implemented. Also, an orientation guide for communication and raising awareness on pesticides and their management for all stakeholders was developed.
- A National Prevention Plan (PNP) was adopted under the previous project. During this project the PNP was updated and is planned to be adopted during the next session of the CNGP and to be submitted to the Council of Ministers. Therefore, the target was achieved.

**Outcomes:**

- A pilot scheme for community management of packing was initiated in Mali and was functional in all the subsidiaries of Kita and Koutiala, not achieving the target of piloting a final strategy in four cotton production zones. Local committees to monitor the implementation of the community management strategy were established. The Community packaging management activities initiated by FAO during the African Stockpile Program Project (ASP-1) (2006-2012) project collected all stocks detained by community members including empty containers. Committees were set up in the project area sites and the PIU delivered several communication and awareness raising activities. Also, public information announcements such as signs, leaflets and calendars were prepared and workshops and meetings on project activities were held. According to the Bank team (September 30, 2020) recent information showed that the container collection initiative pilot has also been implemented in most of the key communes under the leadership of the Environmental Directorate in the other two cotton production zones.

The Efficacy of Objective 2 is rated Substantial with moderate shortcomings.

**Rating**  
Substantial

**OVERALL EFFICACY**

**Rationale**

The achievement of the first objective and the second objective is Substantial. Thus, the overall Efficacy rating is Substantial.



## Overall Efficacy Rating

Substantial

## 5. Efficiency

### Economic efficiency:

According to the PAD (p. 12) conducting an ex ante cost-benefit analysis was not possible due to the challenge of monetizing the negative impact associated with obsolete pesticides. The PAD stated that the project's cost-effectiveness, and in particular the estimated cost of removal and disposal of the publicly-held stocks of obsolete pesticides which constituted the bulk of project financing was estimated at approximately US\$3,950 per ton. This was in line with other similar projects around the world. However, according to the ICR (p. 19) this estimation was likely using the GEF allocation to the "disposal of publicly-held Obsolete Pesticides (OPs) and associated waste" of US\$2.63 million and a quantity of 666 tons. If the actual total cost of this activity had been used (US\$3.08 million), then the estimated cost of disposing Persistent Organic Pollutants (POPs) should have been US\$4,700 per ton at appraisal (p.19, note 17)

The ICR (p. 18) states that the project disbursed US\$4.9 million that benefitted over 6.9 million people resulting in a unit cost of US\$0.7 per beneficiary. The cost of disposing OPs and associated waste was calculated at US\$5,700 per ton. This amount lies in the midrange (ICR, Ta. 3) when compared to other countries such as Cote d'Ivoire (US\$2,400) and Egypt (US\$6,500). According to the ICR (p. 19) this low cost-effectiveness is a result of: i) the total cost of OPs' disposal, which included additional expenses of security guards necessary for the safe collection, transport, and disposal of OPs; and ii) the project disposal of a lower quantity of OPs than expected at appraisal, resulting in an increase in unit cost.

### Operational efficiency:

According to the ICR (p. 20) the National Steering Committee (NSC) ensured timely clearances on key commitments. Also, the collaboration between the PIU, DNACPN and NSC had a positive impact on implementation efficiency. However, the project experienced several implementation issues such as a high turnover rate of directors at the DNACAPN, lack of Financial Management capacity, and the loss of the original contractor due to the deteriorating security situation. All these issues resulted in implementation delays.

Overall, the project's efficiency is Modest.

## Efficiency Rating

Modest





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

Relevance of the objective was Substantial given its alignment with the joint strategy of the Bank and the Government reflected in the most recent Country Partnership Framework. Efficacy was rated Substantial and Efficiency was Modest. Taking everything together, the project’s overall outcome rating is Moderately Satisfactory.

**a. Outcome Rating**  
Moderately Satisfactory

## 7. Risk to Development Outcome

The project’s risk to development outcome can be summarized in these broad categories:

**Government ownership/commitment:** The ICR (p. 23) stated that the government was highly committed to the implementation of the project. The PIU collaborated with the DNACPN and shared information during weekly and monthly meetings. Also, regular meetings of the NSC were chaired by the Minister (or representatives) of Environment Sanitation and Sustainable Development, which resulted in keeping government agencies up to date and allowing for the opportunity to provide guidance. However, between 2015 and 2020, the Minister of the Environment changed six times. Also, the director of the DNACP changed almost as often, resulting in monitoring and coordination issues. Continuity of leadership will be critical for the sustainability of the project outcomes.

**Institutional:** According to the ICR (p. 28) some of the project’s institutional strengthening activities were not completed such as the finalization of the institutionalization of pesticide management to ensure sustained and integrated collection, tracking and monitoring of data on pesticide purchase, use, and obsolescence across government agencies. This might result in the risk of accumulating OP stocks in the future.

**Financial:** The ICR (p. 23) stated that the government had committed to providing additional funds to ensure the implementation of key studies and other prevention activities. However, the funds were never received resulting in these activities not being implemented. Ensuring the continuous provision of funding from the government, donors or both, will be critical to ensure the sustainability of project outcomes.



**Security:** The security situation in the country deteriorated throughout project implementation making supervision in the Northern part, where the sites were located, very challenging. This ongoing situation might have a negative impact on the government's ability to continue its monitoring efforts.

## 8. Assessment of Bank Performance

### a. Quality-at-Entry

According to the ICR (p. 21) the project design took lessons learned from the Africa Stockpiles Program-Project 1 (2006-2012) into account. The lessons learned included: having a qualified technical expert for obsolete pesticides at disposal, being flexible about what could be covered in the disposal contract, pre-developing safeguard instruments, and ensuring that a communications plan was developed and implemented for a wide range of stakeholders.

The Bank team identified the following risks as Substantial: i) local security situation risk, specifically in the northern part of the country where the targeted contaminated sites were located and contractors' access to these sites was limited; ii) health and environmental risks associated with OP handling; iii) new accumulation of OPs due to insufficient technical and institutional capacity of the government; iv) locust outbreaks; and v) lack of sustainable financing for OP removal. The project tried to mitigate these risks through Component 2, which was to support activities to strengthen institutional, regulatory and technical capacity for prevention of obsolete pesticides re-accumulation. Furthermore, the project was to support the operationalization of the strategy for handling, collection and removal of empty containers generated in the four cotton production zones as these contaminated containers. However, the mitigation measures were not sufficient, resulting in several implementation issues (see next section for more details).

The project's Results Framework was adequate (see section 9a for more details).

### Quality-at-Entry Rating

Moderately Satisfactory

### b. Quality of supervision

According to the ICR (p. 28) the Task Team Leader (TTL) was based in the country office, which had a positive impact on ensuring continuous implementation support. Especially, since the budget only allowed for one supervision mission a year. The Bank team conducted training in critical areas such as reporting, procurement, and financial management. When the project faced capacity issues in regards to Financial Management, the Bank supported a part-time secondment of a Financial Management specialist from another Bank project to the Program Implementation Unit (PIU).

However, the Bank's mitigation measures, defined during project preparation, were not sufficient and the project experienced implementation issues due to the lack of consistency of placement of key government positions (six Ministers of Environment between 2015 to 2020), lack of additional funding (the government had agreed to provide funding to ensure key studies and other prevention activities but funding did not



come through), deteriorating security situation, lack of capacity and loss of key staff (especially in key areas such as Financial Management, M&E, and disposal/pesticide management), and issues with the disposal contractor and sub-contractor (a new disposal contractor at site was placed every six weeks without transition arrangements between contractors). On the other hand, the poor and deteriorating security situation undoubtedly aggravated these problems, including lack of funding and loss of key staff.

### **Quality of Supervision Rating**

Moderately Satisfactory

### **Overall Bank Performance Rating**

Moderately Satisfactory

## **9. M&E Design, Implementation, & Utilization**

### **a. M&E Design**

The project's theory of change and how key activities and outputs were to lead to the outcomes was sound and adequately reflected in the Results Framework. The objective was clearly specified and the selected indicators encompassed all outcomes of the PDO statement. Furthermore, the indicators were specific and had baselines and targets and were adequate to capture the contribution of the project's activities towards achieving the PDO. However, the target for project beneficiaries might not have been sufficiently ambitious since it was surpassed over three times.

According to the PAD (p. 9) the PIU was to be responsible for conducting the project's M&E activities. The PIU was to submit progress reports on a semi-annual and annual basis, as well as a mid-term report and a completion report.

### **b. M&E Implementation**

According to the ICR (p. 25) the project's M&E activities included: i) annual supervision missions by the Bank; ii) semi-annual and annual reporting by the PIU to the Bank; iii) meetings by the NSC including all entities involved in the management of pesticides and chaired by the Minister of the Environment; iv) weekly, monthly, and yearly meetings organized by the DNACPN; v) periodic reports to the Environmental Planning and Statistics Unit; vi) financial monitoring reports; and vii) annual audits. The ICR (p. 26) stated that the PIU was to report specific results to the Bank using the GEF's Persistent Organic Pollutant (POP) tool. However, the project did not periodically update the tool due to the difficulty encountered by the PIU to mobilize the disposal firm, which reduced the project implementation capacity and required more attention to be given to supervising the disposal firm and process. An updated GEF POP's tracking tool was developed at project closure.

According to the ICR (p. 26) the PIU fulfilled the reporting requirements and monitored the disposal activities adequately. The project reported M&E results to the members of the NSC on a bi-annual basis. The Bank team stated (August 15, 2020) that, the collected data was reliable and of good quality and



allowed for monitoring implementation progress towards the project's objective. However, in order to ensure the sustainability of the M&E functions, donor support will be necessary.

### **c. M&E Utilization**

According to the ICR (p. 26) M&E activities supported the PIU in identifying and resolving issues during the execution of the disposal contract by the sub-contractor (who lacked consistency in management. M&E activities) also helped to ensure compliance with the Environmental Management Plan (EMP).

The project's M&E design was adequate and regular M&E activities were conducted throughout implementation. However, the PIU did not periodically update the POP tool.

### **M&E Quality Rating**

Substantial

## **10. Other Issues**

### **a. Safeguards**

The project was classified as category A and triggered the Bank's safeguard policies OP/BP 4.01 (Environmental Assessment) and OP/BP 4.09 (Pest Management). According to the ICR (p. 27) the project prepared an overall Environmental and Social Impact Assessment. An Environmental and Social Management Plan (ESMP) was developed to inform environmental and social management throughout implementation. The Bank's safeguard specialist conducted supervision missions and findings were reported in the Aide Memoires. The implementation of a Grievance Redress Mechanism (GRM) was delayed until June 2017 due to challenges to meet with communities in remote and insecure areas. The GRM was later revised to include the needs of the communities that might be affected by the disposal operations. However, throughout project implementation no grievance was recorded.

### **b. Fiduciary Compliance**

#### **Financial Management:**

According to the ICR (p. 27) the Bank's Financial Management (FM) specialist, who was based in the Bank's country office conducted FM supervision missions on a regular basis. The project complied with the Bank's financial covenants and the quarterly interim unaudited interim financial reports were timely and adequate. Also, according to the Bank team (August 15, 2020) the external auditor provided unqualified opinions throughout project implementation. The ICR stated that the most recent audit (for the year ending on December 31, 2018) received an unqualified opinion. Throughout project implementation, the project was able to maintain a Satisfactory rating.

#### **Procurement:**



The ICR (p. 27) stated that the project’s procurement activities followed the Bank’s procurement guidelines and procurement plan. In June 2019, the project conducted a post-review, which found that procurement arrangements were adequate. Furthermore, procurement processes and asset verification under the small grants program were verified by external auditors and accepted by the Bank. According to the Bank team (August 15, 2020) the project used a procurement specialist from an existing Bank financed project to provide technical assistance.

**c. Unintended impacts (Positive or Negative)**

NA

**d. Other**

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**11. Ratings**

Ratings	ICR	IEG	Reason for Disagreements/Comment
Outcome	Moderately Satisfactory	Moderately Satisfactory	
Bank Performance	Satisfactory	Moderately Satisfactory	Lack of adequate mitigation efforts resulting in significant implementation issues and delays.
Quality of M&E	Substantial	Substantial	
Quality of ICR	---	Substantial	

**12. Lessons**

The ICR (p. 29-30) included several lessons learned which were adapted by IEG:

- **Mainstreaming pesticide management across agriculture projects and emergency projects, which procure large quantities of pesticides, might have a positive impact on the government’s capacity to manage pesticides.** Also, supporting governments in adopting the voluntary International Code of Conduct on pesticide management and complying with its key articles will have a positive long-term impact.
- **Ensuring sustainable financing for pesticide management is essential to avoid any re-accumulation of new OP stocks.** In Mali, it was critical that the government continue to financially support the CNGP to ensure the completion of two studies which were to define the characteristics relating to the long-term structure of pest management and sustainable management and funding methods.



### **13. Assessment Recommended?**

No

### **14. Comments on Quality of ICR**

The ICR provided an adequate overview of project preparation and implementation. Also, the ICR was internally consistent, concise and sufficiently outcome driven. However, the ICR, while recognizing the difficulty noted by the PAD, could have undertaken an ex post cost-benefit analysis and estimated an economic rate of return and net present value. It would also have benefitted from lessons learned that were more specifically drawn from project implementation experience. Also, the ICR provided different actual project costs (US\$4.1 million on p.2 and US\$4.91 million on p. 43).

#### **a. Quality of ICR Rating** Substantial