

ILO EVALUATION

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This evaluation has been conducted according to ILO's evaluation policies and procedures. It has not been professionally edited, but has undergone quality control by the ILO Evaluation Office.



Children from Gumaus who have worked or continue to work in the mines.

Final Performance Evaluation

Convening Stakeholders to Develop and Implement Strategies to Reduce Child Labor in Artisanal and Small-Scale Gold Mining (CARING Gold Mining) Project

Final Report
January 13, 2020

QED Evaluation Partner



Evaluators:

Lead Evaluator: Dan O'Brien, Institute for Development Impact
National Evaluators: Daniel Chachu (Ghana) and Rhoda Tiongson (Philippines)

DISCLAIMER

Funding for this evaluation was provided by the United States Department of Labor under Task Order number 1605DC-18-F-00417. Points of view or opinions in this evaluation report do not necessarily reflect the views or policies of the United States Department of Labor, nor does the mention of trade names, commercial products, or organizations imply endorsement by the United States Government

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The following report is the final independent evaluation of the *Convening Stakeholders to Develop and Implement Strategies to Reduce Child Labor in Artisanal and Small-Scale Gold Mining* (CARING Gold Mining) Project. The evaluation is jointly managed by United States Department of Labor (USDOL) and International Labour Organization (ILO). The evaluation report was prepared by Dan O'Brien who served as the lead evaluator. He was assisted by Daniel Chachu and Rhoda Tiongson, who served as assistant evaluators in Ghana and the Philippines, respectively. The evaluation team would like to thank the miners, youth, school teachers, community leaders, civil society organizations, and government officials who offered their time and expertise throughout the evaluation of CARING Gold Mining in Ghana and the Philippines. The team would also like to thank all evaluation participants who provided consent to publish their photos, particularly the Gumaus children, whose picture is included on the cover of this report. Special thanks go to the project staff for their highly effective coordination of the field work in the two evaluation fieldwork countries.

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LIST OF ACRONYMS

ARM	Alliance for Responsible Mining
ASGM	Artisanal and Small-Scale Gold Mining
ASM	Artisanal and Small-Scale Mining
CBMS	Community Based Monitoring System, Philippines
CCPC	Community Child Protection Committee, Ghana
CG	Compassionate Gold
CL	Child Labor
CLARM-Net	Child Labor and Responsible Mining Network
CLLR	Child Labor Local Registry
CLU	Child Labour Unit, Ghana
CMEP	Comprehensive Monitoring and Evaluation Plan
CRAFT	Code of Risk-mitigation for ASM Engaging in Formal Trade
DENR	Department of Environment and Natural Resources, Philippines
DOLE	Department of Labor and Employment, Philippines
DSWD	Department of Social Welfare and Development, Philippines
DTI	Department of Trade and Industry, Philippines
ECOP	Employers' Confederation of the Philippines
ECOWAS	Economic Community of West African States
EPA	Environmental Protection Agency, Ghana
FON	Friends of the Nation, Ghana
GEA	Ghana Employers Association
GEF	Global Environmental Facilities
GMWU	Ghana Mine Workers Union
GNASSM	Ghana National Association of Small-Scale Miners
HRW	Human Rights Watch
IA	Implementation Agreement
IATWG	Inter-Agency Technical Working Group

ILO	International Labour Organization
IRR	Implementing Rules and Regulations, Philippines
KAP	Knowledge, Attitudes, and Practice
LEAP	Livelihood Empowerment against Poverty Program, Ghana
LGU	Local Government Unit, Philippines
MC	Minerals Commission, Ghana
M&E	Monitoring and Evaluation
MELR	Ministry of Employment and Labour Relations, Ghana
MGCSP	Ministry of Gender, Children and Social Protection, Ghana
MLNR	Ministry of Lands and Natural Resources, Ghana
MMIP	Multi-Lateral Mining Integrated Project, Ghana
MSMCT	Multi-Stakeholder Monitoring and Certification Team, Philippines
NAP	National Action Plan, Philippines
NBSSI-BAC	National Board for Small-Scale Industries/Business Advisory Centres, Ghana
NCIP	National Commission on Indigenous People, Philippines
NECPAD	Network for Community Planning and Development, Ghana
NHIS	National Health Insurance Scheme, Ghana
NHIA	National Health Insurance Authority
NPA 2	National Plan of Action for the Elimination of the Worst Forms of Child Labour, Phase II, Ghana
NSCCL	National Steering Committee on Child Labour, Ghana
OECD	Organization for Economic Co-operation and Development
OSH	Occupational Safety and Health
OSHC	Occupational Safety and Health Center, Philippines
OTC	Outcome
PEMO	Provincial Environmental Management Office, Philippines
PMP	Performance Monitoring Plan
PMRB	Provincial Mining Regulatory Boards, Philippines

PPE	Personal Protective Equipment
PSA	Philippines Statistical Authority
RA	Republic Act, Philippines
SCREAM	Supporting Children's Rights through Education, the Arts and the Media
SHIELD	Strategic Helpdesks for Information, Education, Livelihood and other Developmental Interventions (SHIELD) against Child Labor
SO	Sub-Outcome
SSF	Social Support Foundation, Ghana
SSM	Small-Scale Miners
TESDA	Technical Education Skills Development Authority, Philippines
UMaT	University of Mines and Technology, Ghana
USDOL	United States Department of Labor
WB	World Bank
WC	Working Conditions
WFCL	Worst Forms of Child Labour

EXECUTIVE SUMMARY

On December 11, 2015 the U.S. Department of Labor's (USDOL) Bureau of International Labor Affairs (ILAB) awarded the International Labour Organization (ILO) a cooperative agreement (CA) grant worth USD five million to implement the *Convening Stakeholders to Develop and Implement Strategies to Reduce Child Labor in Artisanal and Small-Scale Gold Mining* or *CARING Gold Mining Project*. The original end date for the project was April 10, 2019.

On December 12, 2018, the ILO received a grant modification that provided a six-month no-cost extension, extending the end of project date to October 10, 2019 and aligned the budget to accommodate the extension. On October 7, 2019 ILO received another no-cost modification that extended the end of project date to January 10, 2020.¹

The project aims to increase the capacities of global and national actors to reduce child labor (CL) and improve working conditions (WC) in the artisanal and small-scale gold mining (ASGM) sector. The project design includes four main outcomes or components consisting of laws, policies, and action plans to address CL and WC in the ASGM sector; access of vulnerable ASGM households to social protection and livelihood services; mechanisms to monitor CL and WC in mining supply chains; and global networks to help reduce CL and improve WC in the ASGM sector.

The purpose of the CARING Gold Mining final evaluation is to provide USDOL, ILO, the governments of the implementing countries, implementing partners, ILO's social partners, and key global ASGM actors participating in the project with an assessment of the project's achievements, challenges, and lessons learned. Evaluation fieldwork was conducted in Ghana from August 5-16, 2019 and fieldwork in the Philippines was conducted from August 19-30, 2019. An international evaluator served as the evaluation team leader in both countries. He was supported by one national evaluation expert in Ghana and another in the Philippines.

Based on evaluation questions developed by USDOL and ILO, the evaluators developed guides and protocols that were used to review key documents and conduct interviews and focus group discussions with key informants. The evaluation team used a purposeful, non-random sampling methodology to select direct and indirect beneficiaries to interview in four project communities in Ghana and three project communities in the Philippines. The sample strata included small-scale miners, formal and informal community leaders, child protection committees, teachers, and former and current child laborers and their parents.

¹ After the submission of the CARING Gold Mining draft evaluation report, the evaluation team was informed the project received a two-months no-cost extension, pushing the project's end date to March 2020.

The evaluators interviewed 324 key informants in fieldwork countries and by telephone. Qualitative data were analyzed using a matrix analysis to categorize, triangulate, synthesize, and summarize the raw data captured from the interview notes. The data analysis was driven by the evaluation questions in the TOR.

Findings and Conclusions

Relevance. The project's aim to reduce child labor and improve working conditions in the ASGM sector is well aligned with the needs and priorities in Ghana and the Philippines. The project's first three components, laws and policies, social protection programs, and supply chain monitoring tools meet the needs of the key stakeholders in Ghana and the Philippines. In Ghana, the project supports several important laws and policies including the Children's Act 1998 and the National Policy on Minerals and Mining that prohibit children from working in mining.

The project also supports important laws and policies in the Philippines, which include the Anti-Child Labour Law and the Guidelines in Assessing and Determining Hazardous Work in the Employment of Persons Below 18 Years of Age that prohibit children from working in hazardous industries such as mining and quarrying. The project also supports the county's goal to withdraw one million children from child labor situations by 2025.

It is unclear whether the global network component is meeting the needs of global stakeholders because it has been delayed and has only recently gained momentum.² In collaboration with the International Training Centre (ILO Turin), the project organized a global conference in Manila on CL and WC in ASGM sector and has established a small international working group to work with stakeholders to establish mechanisms for information sharing and peer-to-peer learning. The working group has met three times to follow up on the conference's recommendations including the sharing of lessons. The project also established a national network in Ghana that is not yet fully operational.

Project Design and Validity. The project has been implemented according to the project design and the achievements are consistent with the project's theory of change. Anecdotal information gathered during the evaluation suggests that three of the project's components, including their strategies and interventions, are contributing to reducing CL and improving WC in the ASGM sector. Due to delays, it is too early to determine whether the global network component is contributing as intended in the theory of change.

² The global component, which depends on the implementation of activities in Ghana and the Philippines, was delayed because activities were delayed in those countries. Furthermore, the replacement of the project director, which took 14 months, also contributed to the delay of the global component.

Key factors that have positively affected the theory of change is the collaboration and participation of key stakeholders in developing laws and action plans, accessing livelihood and social protection services, and developing supply chain monitoring tools. The project's strategy to create horizontal linkages among national stakeholders and vertical linkages between national and local stakeholders and linking communities to government resources has been effective.

Those factors that negatively affected the theory of change include uncertain availability of financial and human resources to implement action plans, limited social protection resources, no acceptable alternative to mercury, and limited technical and financial support to help small-scale miners (SSM) comply with stringent contract requirements so they are able to operate legally.

While the project's implementing partners performed as envisioned in the project design, partners in both Ghana and the Philippines struggled meeting ILO technical and financial reporting timelines. They also were unable to deliver all the products specified in their implementation agreements (IAs).³ While these performance issues caused delays and contributed to inefficiencies, they did not have a major negative affect on the theory of change.

Effectiveness of Strategies and Interventions. The project has made progress in achieving its outcome indicator targets in light of delays, especially the mining ban on artisanal and small-scale mining (ASM) operators in Ghana, and appears poised to achieve nearly all its indicator targets by January 10, 2020. The indicator targets that may not be achieved are those for the development objective and the global component.

The project has implemented a variety of interventions under each component that have been effective. The community child protection committees (CCPC) and school clubs in Ghana and Strategic Helpdesks for Information, Education, Livelihood and other Developmental Interventions (SHIELD) against Child Labor in the Philippines are highly effective interventions. Key supply chain monitoring tools such as community registers and the CL monitoring tool in Ghana and the child labor local registry (CLLR) and the Community Based Monitoring System (CBMS) with the child labor rider in the Philippines appear to be effective.

While the project made important progress on national and local action plans in Ghana and the Philippines, their effective implementation will depend on the availability of scarce resources, especially in Ghana. The amendment to the Small-Scale Mining Act in the Philippines will likely not be passed before the project ends. The project also made some progress on improving WC in mines although the adoption of mercury-free methods is low. The project contracted the Alliance for Responsible Mining (ARM) to introduce the Code of Risk-mitigation for ASM Engaging

³ The project deducted project funds for deliverables which were not completed by implementing partners.

in Formal Trade (CRAFT) code as a progressive process to address environmental and social problems but it is too early to determine its effectiveness.

Although BAN Toxics' Compassionate Gold (CG) shows promise, the model requires a considerable amount of work, especially on the supply side. Products, markets, pricing, and promotion strategies have not been defined. One of BAN Toxics' deliverables under its IA was a CG business model that should have addressed these supply side issues, but the business plan was not completed before BAN Toxics' IA expired.

The project effectively convened local and national stakeholders, facilitated dialogue, and encouraged stakeholders to carry out their roles and responsibilities in collaboration with others through its stakeholder engagement strategy. The project also effectively piloted activities in a small number of communities to learn, develop models, and create linkages to resources at the local and national levels. However, the project does not have a strategy in place to effectively roll-out the models and lessons to other mining communities.

Overall, the project's strategy to link ASGM communities and households to livelihood and social protection services has been effective. In Ghana, the project was most successful at linking project communities to National Health Insurance Scheme (NHIS) and getting large numbers of persons registered for health insurance. In the Philippines, the project successfully linked project communities to the Department of Labor and Employment (DOLE) and Department of Social Welfare and Development (DSWD) to receive a range of livelihood and social protection services.

Efficiency. The project has been implemented in an efficient manner. The planned amount of financial and human resources has been adequate to produce the planned outputs and outcomes. However, the project's total budget is underspent by approximately 14 percent while the global component's budget is underspent by 26 percent, which is considerable. Based on the project's average monthly expenditure rate, it would need more than eight months to spend remaining funds or about five months more than the anticipated project end date of January 10, 2020⁴. The project intends to spend the remaining funds on a multi-stakeholder platform, documentation of good practices, communication activities, continuation of mine formalization in Ghana, and sustainability workshops.

Although the project operated in an efficient manner, several factors have created inefficiencies. These include the decision to place the project office in Ghana, which is an ILO project office requiring supervision and support from the ILO country office in Nigeria, instead of the Philippines, which is an ILO country office that is structured to

⁴ After the submission of the CARING Gold Mining draft evaluation report, the evaluation team was informed the project received a two-months no-cost extension, pushing the project's end date to March 2020.

provide direct supervision and support to ILO projects; 20 months to develop and approve the comprehensive monitoring and evaluation plan (CMEP); 14 months to replace the first project director; high turnover of implementing partners' staff; difficulty meeting reporting deadlines among implementing partners; a ban on small-scale mining in Ghana that lasted nearly two years; and a 10 month delay by Ban Toxics to develop the CG business model that was never finished.⁵

Effectiveness of Project Management. The project's staffing structure was appropriate to achieve the outcomes in Ghana and the Philippines. The decision to hire child labor officers, mining officers, and monitoring and evaluation (M&E) officers in both countries contributed to effective project implementation and was the correct decision. On the other hand, the effectiveness of using implementation partners is mixed. While the Ghana National Association of Small-Scale Miners (GNASSM) proved to be a reliable and strategic partner, the Social Support Foundation (SSF) encountered problems with staff turnover and meeting deadlines for technical and financial reports. In the Philippines, BAN Toxics also struggled with high staff turnover, meeting reporting requirements, and achieving several key deliverables.

The CMEP development process, including its tools, is highly effective. The CMEP was also sufficiently flexible to allow the project to make adjustments during the midterm review of the project. While the CMEP is effective and flexible, the CMEP development process took nearly 20 months that created inefficiencies by interfering with implementation.

Sustainability. The project has managed to achieve several key sustainability success factors that lay the foundation for sustainability. These include creating ownership among stakeholders, building their capacity, creating horizontal and vertical linkages between stakeholders to promote collaboration and access to resources.

Those outputs and outcomes that are most likely to be sustained once the project ends in Ghana include linkages between key stakeholders, CCPCs in the short to medium-term, school clubs, CL-WC monitoring tools, and national and local level action and development plans. Outputs and outcomes most likely to be sustained in the Philippines include SHIELD, CBMS with the CL rider, revised implementation rules and regulations to the People's SSM Act, mining associations linked to DOLE, linkages between key stakeholders, and the online mining portal. At the global level,

⁵ The Ghanaian government imposed a ban on small-scale mining in March 2017 due to concerns about the environmental damage it was causing. The ban was lifted in December 2018 for those small-scale miners who register and operate legally. The project decided to suspend activities related to mining operations in communities since small-scale mining activities were banned by the government.

the World Bank's *Delve* that will host an ASGM repository for data sets and documents shows strong sustainability promise.

Lessons and Good Practices

Lessons Learned

- Deep involvement and participation of key stakeholders creates ownership that contributes to sustainability.
- Creating horizontal linkages between key national stakeholders and vertical linkages between national and local stakeholders on ASGM increases effectiveness and efficiency.
- The CRAFT's emphasis of progressively addressing environmental and social problems is appropriate for the ASGM sector since many SSM lack resources required to achieve full formalization.
- Behavior change related to mine Occupational Safety and Health (OSH) requires access to viable and acceptable options.
- Implementing partners should have a dedicated M&E and finance officers to meet quality and deadline requirements for technical and financial reporting.
- Locating the project office where it receives effective and efficient administrative and financial backstopping.

Good Practices

- The project built on existing structures rather than create new ones.
- The project worked closely with local governments to align local government plans and resources with community needs and priorities.
- The project tapped stakeholders to conduct training and develop tools rather than hiring outside consultants.
- In Ghana, the project supported the establishment of school clubs using the ILO's Supporting Children's Rights through Education, the Arts, and Media (SCREAM) methodology, which is highly participative and interactive.
- GNASSM as a platform to address responsible mining including child labor and working conditions (Ghana)
- In the Philippines, the project supported the development and piloting of the Strategic Helpdesks for Information, Education, Livelihood and other Developmental Interventions (SHIELD), the piloting of the Community Based Monitoring System (CBMS) with child labor rider questions, and policy dialogue between the ASGM sector and government.
- In the Philippines, the project provided technical assistance and learning opportunities to enable the Malaya community to transform itself into a legal mining community free of child labor and mercury. environmental mining practices to child labor free and mercury free mining practices.

Recommendations

USDOL Recommendations

1. USDOL should determine ways to decrease the amount of time it takes to develop and approve the CMEP that might include the use of more templates and other pre-completed sections.

ILO Recommendations

2. The ILO should request a two-year cost extension to roll-out models and lessons to other ASGM communities, strengthen the global component, and implement the sustainability plan.

General Project Recommendation

3. The project should give the school clubs a more prominent profile in its reporting including developing a case study on its effectiveness.

4. The project should develop a documentary on the transformation of Malaya (noted as a good practice) showcasing the improvements the mining association made to reduce CL, improve WC, and mitigate environment damage caused by mining operations.

5. The project should work with its key stakeholders in a participatory manner to develop a strategy and plan to roll-out successful models and lessons to more mining communities in the current targeted districts and provinces as well as communities in new districts and provinces.

6. The project should work with its key stakeholders in a participatory manner to develop a sustainability plan that provides a clear roadmap to sustainability during the final months of the project.

7. The project should review indicators for the development objective (*number of countries, regional bodies and government institutions, social partners and international civil society groups that take significant actions to reduce CL and improve WC in ASGM*) and sub-outcomes 1.4 (*percent of stakeholders trained who have an increased score from pre and post-test results and can identify concerns relating to WC and CL in ASGM including OSH*) and 4.1 (*percent of targeted global networks operational*) to ensure they are accurately calculated and reported based on definitions in the CMEP.

8. If the request for a two-year cost extension is approved, the project should revise the global component by defining precisely what the component is intended to achieve in terms of reducing CL and improving WC in the ASGM sector.

9. If the two-year cost extension is approved, the project should conduct a study to determine why the employment rate for females who were trained in electronics is so low and what actions the project can take to increase employment rates.

Country-Specific Project Recommendations

10. In the Philippines, the project should assist Occupational Safety and Health Center (OSHC) to develop an OSH training manual and plan that meets the needs and priorities of miners operating in the ASGM sector.

11. The project should hire a consultant with business planning experience to work closely with key stakeholders in South Cotabato to develop a business plan for T'boli gold.

I. CONTEXT AND PROJECT DESCRIPTION

1.1. Context⁶

The artisanal and small-scale gold mining (ASGM) sector is economically significant, accounting for 15–20 percent of annual global gold production. ASGM provides employment and income for an estimated 40 million miners.⁷ The workforce in ASGM is diverse, comprising working-age men and women, children and the elderly, many of whom are migrants drawn to gold mining zones by the prospect of making fast money. But the conditions of life and work they face are harsh. Due to lack of employment contracts or social protection or state support of any kind, workers in the ASGM sector are considered as vulnerable laborers undertaking extremely hazardous work. ASGM workers are casually employed with little documentation, no contracts and no minimum wage, even if there could be opportunities for collective bargaining.

According to the International Labour Organization (ILO), 152 million children are in child labor globally, accounting for nearly 10 percent of all children worldwide.⁸ Nearly half of all those work in hazardous conditions that directly endanger their health, safety, and moral development. Ninety percent of children in child labor situations are in the Africa and Asia and the Pacific regions. In Africa, 72 million children or about 20 percent work in child labor situations while 62 million children or seven percent of children in the Asia region work in child labor situations.⁹

In both Ghana and the Philippines, small-scale mining operations are characterized by environmental destruction, use of children, and unsafe and poor working conditions. Many existing ASGM activities are unlicensed and unregulated, resulting in illegality. These illegal ASGM operations are reported to cause environmental problems such as deforestation, contamination of water bodies because of mercury and cyanide pollution, soil erosion and siltation, loss of biodiversity, and loss of soil productivity. The occupational risks that ASGM workers are reported to be exposed to include: electrocution, gas poisoning, and accidents from explosives. Shaft collapses lead to injury, sickness or even death but these are not reported for fear that this might result in a crackdown on the illegal operations.

⁶ The description of the project's context was taken largely from the project document and the comprehensive monitoring and evaluation plan (CMEP).

⁷ Trends in Small-Scale and Artisanal Mining, Inter-Governmental Forum on Mining, Minerals, Metals, and Sustainable Development, 2018: <https://www.iisd.org/sites/default/files/publications/igf-asm-global-trends.pdf>

⁸ ILO, Global Estimates of Child Labour: Results and trends, 2012-2016; https://www.ilo.org/global/publications/books/WCMS_575499/lang--en/index.htm

⁹ Ibid

The social problems associated with ASGM include exposure to high levels of mercury emissions and some cases of mercury poisoning, unregulated migration to mining sites which leads to communities with poor governance structures and limited access to basic services, land tenure and conflicts, poor working conditions of workers including absence of social protection, and exploitation of children. Whereas poverty remains a critical root cause of the problem, meeting the basic survival needs of affected families does not seem to be enough to keep children away from the gold mines.

1.2. Project Description

On December 11, 2015, USDOL’s Bureau of International Labor Affairs (ILAB) awarded the ILO a CA grant worth USD five million to implement the *Convening Stakeholders to Develop and Implement Strategies to Reduce Child Labor in Artisanal and Small-Scale Gold Mining* or *CARING Gold Mining Project*. The original end date for the project was April 10, 2019.

On December 12, 2018, the ILO received a grant modification that provided a six-month no-cost extension, extending the end of project date to October 10, 2019 and aligned the budget to accommodate the extension. On October 7, ILO received another no-cost extension that extended the end of project date to January 10, 2020¹⁰.

The project objective aims to increase the capacities of global and national actors to reduce child labor (CL) and improve working conditions (WC) in the ASGM sector. To support the project objective, the project design includes four main outcomes or components consisting of laws, policies, and action plans to address CL and WC in the ASGM sector; access of vulnerable ASGM households to social protection and livelihood services; mechanisms to monitor CL and WC in mining supply chains; and global networks to help reduce CL and improve WC in the ASGM sector. Table 1 shows the project’s objective, outcomes (OTC), and corresponding sub-outcomes (SO).

Table 1: CARING Gold Mining Project

Project Objective and Outcomes
Project Objective: Increase the global and national capacities to reduce child labor and improve the working conditions in the ASGM sector
OTC 1: Laws, policies and action plans to address child labor and/or working conditions in ASGM are adopted and/or enforced and implemented
<i>SO 1.1. Child labor and working conditions addressed in national and local laws, policies, development plans, regulations, licensing contracts, action plans and budget allocations</i>
<i>SO 1.2. Inter-agency coordination mechanisms at national and local levels implemented</i>

¹⁰ After the submission of the CARING Gold Mining draft evaluation report, the evaluation team was informed the project received a two-months no-cost extension, pushing the project’s end date to March 2020.

SO 1.3. Interagency protocols and tools to improve enforcement utilized

SO 1.4. Stakeholder knowledge on CL and working conditions, including OSH, improved

OTC 2: Access of vulnerable households living in ASGM communities to relevant social protection and livelihoods programs is improved in Ghana and the Philippines

SO 2.1. Stakeholders/institutions mobilized to improve access to social protection and livelihood programs by ASGM communities

SO 2.2. Ability of ASGM communities to articulate their needs and requests for support and services increased

OTC 3: Mechanisms to increase monitoring of CL and WC in gold mining supply chains, particularly ASGM, are developed and implemented in Ghana and the Philippines

SO 3.1. Mandated Government agencies and other stakeholders improve monitoring in ASGM with a focus on CL and WC

SO 3.2. Awareness of stakeholders on CL and WC in ASGM, including but not limited to monitoring mechanisms increased

OTC 4: Global networks to reduce child labor (CL) and improve working conditions (WC) in ASGM are operational

SO 4.2. Coordination among global networks and stakeholders is enhanced

SO 4.2. Innovative solutions and lessons learned are disseminated

OTC 1 to 3 are designed to be achieved through specific country-level action in Ghana and the Philippines. On the other hand, OTC 4 requires both country-specific and global action in other countries engaged in ASGM as well as with international partners operating at national, regional, and global levels. Project beneficiaries include child laborers and their families, artisanal and small-scale gold miners and workers, and government agencies and local government units.

The project's strategies were designed to strengthen laws and policies related to the ASGM sector, create linkages between vulnerable households in mining communities and government social protection and livelihood services, monitor the gold supply chain, and strengthen global networks on ASGM. The strategies also were designed to support stakeholders to work together in a collaborative effort to implement country-specific measures.

The project was implemented in a select group of pilot sites in both Ghana and the Philippines. In Ghana, the Project focused its interventions in two mining communities in the district of Adansi North, Ashanti Region and two mining communities in the municipality of Aowin, Western North Region. The project awarded IAs to the Ghana National Association of Artisanal and Small-Scale Miners (GNASSM), the Social Support Foundation (SSF), and the Network for Community Planning and Development (NECPAD) to implement activities in Ghana. The key national government and non-government stakeholders included the Ministry of Lands and Natural Resources (MLNR), MLNR's Mineral Commission (MC), Ministry of Employment and Labour Relations (MELR), MELR's Child Labour Unit (CLU), Ministry of Gender, Children, and Social Protection (MGCS P), Ministry of Local Government and Rural Development (MLGRD)'s Local Government Services (LGS), National Board for Small-Scale Industries/Business Advisory Centres (NBSSI-BAC) and the

University of Mines and Technology (UMaT). The district assemblies served as the primary local government counterparts.

In the Philippines, the project was implemented in seven mining communities in the municipalities of Labo and Paracale in the province of Camarines Norte and in T'boli in the province of South Cotabato. In the Philippines, the project awarded an IA to BAN Toxics to implement activities. The key national stakeholders included the Department of Environment and Natural Resources (DENR), DENR's Mines and Geosciences Bureau (MGB), Department of Labor and Employment (DOLE), DOLE Occupational Safety and Health Center (DOLE-OSHC) Department of Social Welfare and Development (DSWD), Technical Education and Skills Development Authority (TESDA), and the Community Based Monitoring System (CBMS) Network Office. The local government units (LGU) and provincial offices of DOLE and DSWD served as the primary local government counterparts.

II. EVALUATION PURPOSE AND METHODOLOGY

2.1. Evaluation Purpose

The overall purpose of the CARING Gold Mining final evaluation is to provide USDOL and ILO with an independent assessment of the project's performance and experience. Specifically, the evaluation is intended to achieve the following objectives.

1. Determine whether the project's theory of change as stated in the project comprehensive monitoring and evaluation plan, was appropriately formulated and whether there are any external factors that affected project outcomes in a positive and/or challenging way.
2. Assess the relevance, effectiveness, efficiency of project interventions at the local, national, and global levels.
3. Document lessons learned, good or promising practices, and identify additional opportunities as input for current or future initiatives to address child labor and working conditions in ASGM in pilot countries and/or other countries.
4. Assess which outcomes or outputs can be deemed sustainable.

The final evaluation assesses whether the project has been implemented as planned and identifies promising practices and lessons learned. The scope of the evaluation includes a review and assessment of activities carried out under the United States Department of Labor (USDOL) cooperative agreement (CA) with ILO in Ghana and the Philippines.

USDOL and ILO developed a set of questions to guide the evaluation. The questions address key issues in (1) relevance; (2) project design; (3) effectiveness of strategies and interventions; (4) efficiency; (5) effectiveness of project management; (6) sustainability; and (7) lessons learned and good practices. The evaluation questions appear in the Terms of Reference (TOR) in Annex A.

This final evaluation also provides USDOL, ILO, the governments of the implementing countries, implementing partners, ILO's social partners, and key global ASGM actors participating in the project with an assessment of the project's achievements, challenges, and lessons.

2.2. Methodology

The evaluation team followed the evaluation methodology and principles described in the TOR. These include the triangulation of data collection, inclusion of parents' and children's voices using child-sensitive approaches that follow the ILO-IPEC guidelines on research with children on the worst forms of child labor and UNICEF

principles for ethical reporting on children¹¹, and gender and cultural sensitivity. The evaluation team's approach to help ensure gender and cultural sensitivity included interviewing young children in the presence of their parents, interviewing women involved in enterprise development activities in their homes and in the presence of their spouses when requested, and adhering to cultural protocols when interviewing village chiefs and elders in Ghana and indigenous peoples in the Philippines.

As noted previously, USDOL and ILO developed a list of evaluation questions that served as the basis for the evaluation. The questions were used to develop guides and protocols for the key informant interviews, focus group discussions, and document reviews. The master key interview questions is listed in Annex B.

Evaluation fieldwork was conducted in Ghana from August 5-16, 2019 while fieldwork in the Philippines was conducted from August 19-30, 2019. An international evaluator served as the evaluation team leader in both countries. He was supported by one national evaluation expert in Ghana and another in the Philippines. Biographies of the evaluators appears in Annex C.

The following methods were employed to gather primary and secondary data.

Document Reviews: The evaluation team read numerous project documents and other reference publications. These documents included the project document; comprehensive monitoring and evaluation plan (CMEP); knowledge, attitude, and practices (KAP) survey report; technical progress reports (TPR); project modification approvals; and other supporting project materials obtained during the fieldwork component. Annex D shows a complete list of documents that were reviewed.

Key Informant Interviews: The evaluation team interviewed project staff, implementing partners, government counterparts, and other key stakeholders involved in the project. The evaluation team used a purposeful, non-random sampling methodology to select direct and indirect beneficiaries to interview in four project communities in Ghana and three project communities in the Philippines. In Ghana, the sample strata included small-scale miners, formal and informal community leaders, child protection committees, teachers, and former and current child laborers. In the Philippines, the sample strata included small-scale miners, formal and informal leaders, and former child laborers and their parents. The evaluators conducted focus group discussions with current and former child laborers and their parents.

Table 2 summarizes the organizations interviewed, the interviewing methodology, the sample size, and characteristics of the sample. The evaluators interviewed 326 key informants (individual and group) in fieldwork countries and by telephone. In Ghana, the evaluation team interviewed 164 key informants of whom 87 percent

¹¹ <http://www.ilo.org/ipecinfo/product/viewProduct.do?productId=3026> and http://www.unicef.org/media/media_tools_guidelines.html

were male. The large number of males can be explained by the fact that men occupy most of the government jobs, nearly all of the village chiefs and elders are men, and the miners who were interviewed were men.

Table 2: Qualitative Sample Size and Sample Characteristics

Stakeholder Group	Sample Size			Sample Characteristics
	Female	Male	Total	
Ghana				
ILO	1	3	4	Project staff (project director, mining officer, child labor officer, and M&E officer)
Implementing Partners	1	6	7	Representatives from SSF, GNASSM, and NECPAD
National Government	2	9	11	Representatives from MELR, LGS, MLNR/MC, and NBSSI-BAC
Local Government	2	18	20	District and municipal assembly officials, teachers
Miners	0	38	38	Small-scale miners from project communities
Children	3	5	8	Former and current child laborers from project communities
Parents and trainees	5	0	5	Parents and guardians of children interviewed and beneficiaries of entrepreneurship training from project communities
CCPCs	6	27	33	CCPC members from project communities
Community leaders	1	36	37	Traditional council members, village elders, linguists, and other opinion leaders
Others	0	1	1	Representative from Ghana Employers Association
Sub-Total	21	143	164	
Philippines				
ILO	4	0	4	ILO project staff (country coordinator, M&E officer, and administrative assistant), ILO program coordinator
Implementing Partners	7	4	11	BAN Toxics project staff and former staff
National Government	6	1	7	DENR, DOLE, DSWD, OSHC representatives
Local Government	7	11	18	Local government representatives from Camarines North and South Cotabato
Miners	35	36	71	Small-scale miners from Malaya and Gumaus in Camarines Norte and Kematu in South Cotabato. Representatives from the Philippine SSM National Coalition
Children	14	14	28	Former and current child laborers from Malaya and Gumaus in Camarines Norte

Parents	9	0	9	Parents of former and current child laborers from Malaya and Gumaus in Camarines Norte
Youth	5	2	7	Graduates from the TESDA technical training in plumbing (males) and electronics (females)
Other	1	1	2	UP- DOST, CBMS Network Office
Sub-Total	88	69	157	
International				
ILO	0	1	1	Project desk officer in Geneva
International Partners	1	2	3	Representatives from OEDC, ARM, and the World Bank ¹²
USDOL	1	0	1	USDOL-ILAB-OCTF grants officer representative
Sub-Total	2	3	5	
TOTAL	111	215	326	

The evaluation team interviewed 157 key informants in the Philippines. Nearly 57 percent of the interviewees were females, which can be explained by the fact that women occupy many of the government posts in DOLE, DSWD, and OSHC. In addition, the vast majority of the parents who participated in the focus group discussions with their children were women. A complete list of individuals interviewed appears in Annex E.

Data Analysis. Qualitative data were analyzed using a matrix analysis to categorize, triangulate, synthesize, and summarize the raw data captured from the interview notes. The results of the data analysis provided tangible blocks of information, which the evaluators used to write the evaluation report. The data analysis was driven by the evaluation questions in the TOR. The wealth and variety of information collected allowed for high-level reinforcement and synthesis across sources to obtain a more cross-cutting and comprehensive analysis of the evaluation questions.

Limitations. Several important limitations could affect the evaluation findings. The most significant limitation was the time allotted to conduct fieldwork. The evaluators had four weeks to conduct interviews with project staff, implementing partners, government officials, representatives of the social partners, community leaders, miners, youth beneficiaries, and other stakeholders in Ghana and the Philippines. This was not enough time to visit all the communities where the project is being implemented and interview all key stakeholders involved with the project. Another important limitation is that the KAP endline survey was not available at the time of

¹² Information was exchanged with the World Bank’s mining expert regarding the Delve platform.

the evaluation making it impossible to assess those indicators dependent on the results of the survey.

It should also be noted that this evaluation is not a formal impact assessment. The findings for the evaluation were based on information collected from background documents, the project's monitoring and evaluation system, key informant interviews, and focus group discussions. The accuracy of the evaluation findings is predicated on the integrity of information provided to the evaluation team from these sources and the ability of the evaluation team to triangulate this information. Furthermore, the sample of beneficiaries was purposive based on selection criteria, which means the findings cannot be generalized to all beneficiaries.

III. FINDINGS

The findings address the questions in the TOR and are organized according to the following evaluation areas: relevance, project design and validity, effectiveness of strategies and interventions, efficiency, project management arrangements, sustainability, and lessons and good practices.

3.1. Relevance

This section answers the first evaluation question:

- To what extent did the components (law and policies, access to social protection programs, supply chain tools, and networks) and approach (local, national, and global) meet the needs of the country and stakeholders?

3.1.1. Alignment with National Priorities and Needs

The evaluation team found that the project's four components and approach were well aligned with existing national priorities and needs in both Ghana and the Philippines.¹³ The existence of CL and poor WC in the ASGM sector are associated with operations that are unregistered and illegal. In both countries, children work in mining operations that are unsafe and are considered worst forms of child labor (WFCL) that include working underground, working underwater, using dangerous equipment, carrying heavy loads, handling explosives, and using harmful substances and chemicals. In addition, children often opt to work in mines to generate income instead of attending school.

In Ghana, the Children's Act of 1998 (Act 560) proscribes the involvement of children in hazardous activities such as mining and quarrying. In February 2016, the government launched the National Policy on Minerals and Mining, which also prohibits children from working in mining. In addition, the Environmental Protection Agency (EPA) is developing a National Action Plan (NAP) for the ASGM sector for the implementation of the Minamata Convention on Mercury.

The Philippines has a variety of laws, regulations, and initiatives to address CL and WC in the ASGM sector. These include:

- The Anti-Child Labour Law (RA 9231) prohibits children from working in hazardous conditions.
- Executive Order No. 92 issued by President Duterte that institutionalizes the National Council Against Child Labor.

¹³ The laws and policies discussed in this section existed before the project.

- Guidelines in Assessing and Determining Hazardous Work in the Employment of Persons Below 18 Years of Age (DO No. 149 s. 2016) prohibits children from working in hazardous industries such as mining and quarrying.
- An Inter-Agency Technical Working Group (IATWG) on ASGM will be consulted to finalize the NAP on ASGM, in compliance with the country's commitment to Minamata Convention on Mercury.
- The Small-scale Mining Law (RA 7076) and the Implementing Rules and Regulations.
- National Internal Revenue Code (RA 11256) that exempted small-scale miners from paying income and excise tax for the gold that they sell to the Central Bank.
- Child labor rider questions added to the Labor Force Survey.

The project's efforts to address CL and WC, including eliminating the use of mercury in ore processing, in the ASGM sector is well aligned with CL national laws and policies in both Ghana and the Philippines.

Local and national level government stakeholders in Ghana and the Philippines believe the project is meeting important needs and priorities of the countries. In Ghana, the chief executives of Adansi North and Aowin, told the evaluation team that the project's focus on addressing CL and poor WC in the ASGM sector is highly appropriate and is well aligned with the district medium-term development plans. Representatives from the MELR/CLU noted that efforts to identify and withdraw children from hazardous work in mines directly supports the Phase II of the National Plan of Action for the Elimination of the Worst Forms of Child Labour (2017-2021).¹⁴ However, the director of CLU opined that the project should have provided direct services to children and included specific indicators measuring the withdrawal of children from WFCL situations that would contribute to MELR's CL targets.

In the Philippines, a representative from MGB, responsible for ASGM, told the evaluation team that the project's efforts to help formalize the ASGM sector and eliminate the illegal use of mercury is strongly aligned with MGB's action plans. A DENR representative appreciated the assistance of the project to orient small-scale miners (SSM) on safety and health, linking child laborers and their families to social services, and helping DENR conduct a summit on ASGM. However, she noted that the project could have provided more assistance to SSM in complying with the technical requirements for their *Minahang Bayan* and small-scale contract applications. *Minahang Bayan* are areas designated by the government where SSM can operate legally, enabling the government to better monitor and regulate their extractive activities while helping promote the safety of these workers, protect the environment, and generate revenues for government.¹⁵

¹⁴<https://www.unicef.org/ghana/media/1836/file/National%20Plan%20of%20Action%20to%20Eliminate%20the%20Worst%20Forms%20of%20Child%20Labour.pdf>

¹⁵ For more information on Minahang Bayan, please refer to: <https://www.mining-technology.com/mining-safety/mine-safety-association-criticises-philippine-minahang-bayan-scheme>

Representatives from DOLE and DSWD commented that the project’s efforts to address CL in mining was timely given the country’s goal to withdraw 1 million children from CL by 2025 and the Philippine Development Plan 2017-2022 strategy to reduce CL by 30 percent in the medium-term. In addition, the project efforts to link government agencies supports the Philippine Program Against Child Labor Strategic Framework 2017-2022, which aims to institutionalize a CL committee, establish a national CL monitoring and evaluation system, improve the enforcement of anti-child labor laws, and expand access of child laborer households to social protection services and decent work.

3.2. Project Design and Validity

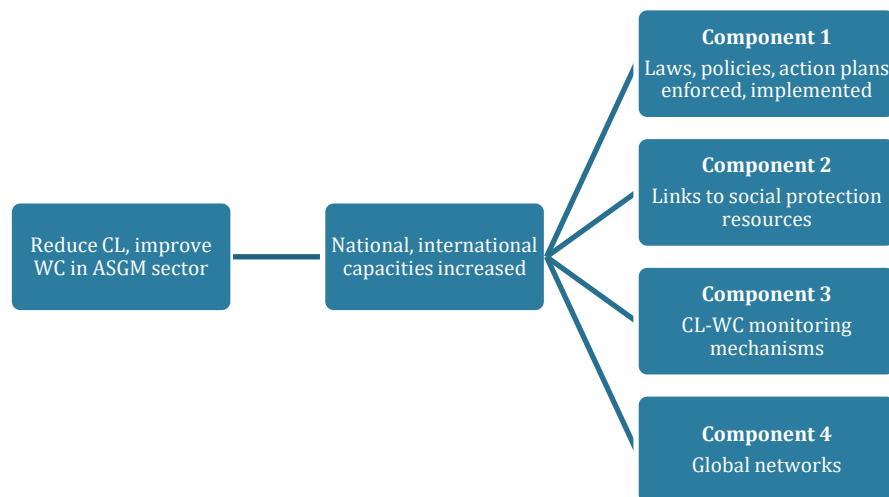
This section addresses two evaluation questions related to project design and validity.

- Have the achievements of the project been consistent with the Theory of Change? How did the four components and approach contribute to achieving the goal of reducing child labor and improving working conditions in ASGM? What factors positively or negatively impacted the theory of change?
- Did the project implementers/implementing partners work according to their expected roles as envisaged in the design?

3.2.1. Theory of Change

Figure 1 shows an abbreviated version of the project’s theory of change (TOC). The complete version of the TOC appears in the TOR in Annex A. The TOC hypothesizes that if components 1-4 are achieved, the capacities of international and national actors will be increased, which, in turn, will reduce CL and improve WC in the ASGM sector.

Figure 1: Theory of Change



In general, the evaluation team found that the project’s TOC was implemented as designed and progress was made in achieving the four components as well as increases in national capacities. However, the evaluators were not able to determine whether the project helped

reduce CL and improve WC in the ASGM sector, which is the ultimate goal of the project (see Figure 1). It should be noted that the KAP endline survey results were not available at the time of the evaluation, which would have helped the evaluators assess improvements in CL and WC in the ASGM sector.

It should be noted that the original TOC consisted of five components. The fifth component, *Innovative solutions to reduce child labor and improve working conditions in ASGM are supported and disseminated in Ghana, the Philippines and other countries*, was moved and integrated with the second component. The primary outputs and outcomes of the other four components listed in the CMEP, with few exceptions, were achieved as planned. A complete analysis of the performance of the project's outcome indicators appears in Annex F.

The evaluation team discovered a range of factors that threaten the logic of the TOC in Ghana and the Philippines. These are discussed below.

- *Availability of financial and human resources to implement action plans.* The project was successful at assisting key government agencies in Ghana and the Philippines to develop action plans at the local and national levels to address CL and improve WC in the ASGM sector. However, based on interviews with government representatives in both countries, it is not certain that adequate resources will be available to fully implement the action plans.
- *Transfer of national and local level child labor champions.* The evaluation team discovered that there are both elected officials such as assembly representatives in Ghana and mayors and barangay captains in the Philippines as well as government officials at local and national levels in both countries who are strong advocates for reducing CL and improving WC in ASGM. It is possible that these champions will lose elections or be transferred outside of current and future project intervention areas.
- *Availability of social protection resources.* One of the most important project strategies is linking mining communities to government social protection programs such as school feeding and the Livelihood Empowerment against Poverty Program (LEAP) program in Ghana and livelihood, education, and medical assistance in the Philippines. The evaluation team found that there was a shortage of resources provided by these social protection programs and that not all mining households that qualify for services actually receive them.
- *Availability of financial resources to implement the CL and WC monitoring tools.* The project worked closely with key government agencies in Ghana and the Philippines to develop CL and WC monitoring tools. While the tools were developed, many have not yet been utilized due to the lack of resources or pending formal approval. For example, the MC has developed a checklist tool, which is waiting for approval before it can be used.
- *No acceptable alternative to mercury.* The project has effectively communicated the dangers of using mercury in ore processing to miners. While miners understand the risks associated with using mercury, most are not willing to stop using it until there is an acceptable alternative method to separate gold. In the Philippines, BAN Toxics

has worked hard to convince miners to use the gravity concentration method instead of mercury.¹⁶ However, miners consider mercury to be a much more efficient method in terms of cost and time.

- *Passing the amendment to the People's Small-Scale Mining Act (RA 7076) in the Philippines will be challenging.*¹⁷ The project contracted a consultant to develop the draft amendment to the People's Small-Scale Mining Act (People's SSM Act). Once the amendment is finalized, the ILO would need to work with partners to find a congressperson to sponsor the amendment. However, based on interviews with stakeholders, passing the amendment will be a major challenge given concerns Philippine lawmakers have about how mining, including SSM, is damaging the environment.
- *Limited technical and financial support to help SSM comply with stringent Minahang Bayan and mining contract requirements.* The project's efforts to help SSM formalize their operations so they can operate legally is a long and costly process. The area they intend to mine must first be declared *Minahang Bayan*. Then miners must acquire a range of environmental certifications as well as a detailed topographical study. In Malaya, miners estimate these certifications and studies will cost P 750,000 or USD 15,000. Ban Toxics estimates that to operate legally, SSM must invest P 10 million or USD 193,000, which includes the permissions, equipment, and other capital costs. To complicate matters, DENR and MGB, responsible for small-scale mining, have very limited technical and financial resources to support the *Minahang Bayan* and the mining license process. Unless the process of acquiring *Minahang Bayan* status and mining contracts is simplified, most SSM will continue to operate informally and illegally.

3.2.2. Roles and Responsibilities of Implementing Partners

The project largely operated through agreements with implementing partners in Ghana and the Philippines. In Ghana, it worked primarily with GNASSM, SSF, and NECPAD. The project provided GNASSM two Implementation Agreements (IA). The first was to set up and manage coordinating mechanisms at national and local levels along the ASGM supply chain and the second was to build capacity and mobilize communities and local and national government actors to address CL and poor WC in the ASGM sector. The project provided SSF one IA to work with communities and government stakeholders to develop a CL monitoring system

¹⁶ Gravity concentration method is a term used by BAN Toxics and DENR in the Philippines to describe how gold is separated without using mercury. For purposes of the evaluation report, the term gravity concentration is used to describe the non-mercury method promoted by BAN Toxics in the Philippines.

¹⁷ The People's Small Scale Mining Act 1991 or Republic Act (RA) 7076 established the small-scale mining program including the Minahang Bayan: <http://policy.denr.gov.ph/basicpol/mincode/ra7076.pdf>. The proposed amendment to RA 7076 is intended to streamline the mining license process making it more efficient for small scale miners to obtain licenses to operate legally.

and another IA to NECPAD to create and support a national network focused on CL and WC in ASGM.

In the Philippines, the project's primary implementing partner was BAN Toxics, which the ILO included in the proposal because BAN Toxics had a presence in mining communities in Camarines Norte and South Cotabato as well as a strong background working with miners on mercury-free technologies to process ore. The ILO provided an IA to BAN Toxics to implement activities in Camarines Norte and South Cotabato.

Implementing partners in both Ghana and Philippines experienced difficulty in meeting some of the deliverable requirements as specified in the IAs. In Ghana, GNASSM was unable to deliver two products. These include the registration of households in two target communities in Aowin district in the National Health Insurance Scheme (NHIS) and written agreements with MGCSP and NHIA for school feeding and health insurance, respectively. GNASSM was unable to register households in Aowin district because there was not a cell tower that was necessary for NHIA to register households using mobile phones.¹⁸ GNASSM did not sign agreements with MGCSP and NHIA because, as government authorities, they are not permitted to sign agreements with non-government organizations like GNASSM.

SSF was also unable to deliver two products. The first was a training on a malaria application in Aowin and the second was written agreements with civil society organizations to provide support services to child laborers. The training on the malaria application was not conducted because, according to the project, the application requires the use of mobile phones that was not possible because there was not a cell tower in the two Aowin communities (noted previously). The written agreements with the civil society organizations did not materialize because these organizations did not have the resources to provide support services to child laborers, which was the premise of the agreements.

In the Philippines, BAN Toxics was unable to complete five deliverables specified in its IA. These include a (1) workshop to identify strategies for the implementation of the ASGM NAP; (2) a workshop to finalize CL and WC operational protocols, mechanisms, and referral processes; (3) capacity building for Provincial Mining Regulatory Boards (PMRB); (4) publication, launch and dissemination of the market study and business model for Compassionate Gold; (5) and the launch of the supply chain monitoring system and monitoring activities. The project will deduct project funds from the implementation agreement with Ban Toxics to address this issue.¹⁹

The implementing partners struggled at times with meeting deadlines for submitting technical and financial reports that caused delays. This was especially true for SSF and BAN Toxics. One possible explanation is that the implementing partners lacked experience

¹⁸ After the final evaluation's field work ended, a telephone company built a cell tower, which has allowed households to register with NHIS.

¹⁹ Supporting documentation will be submitted to DOL by December 11, 2019.

preparing the kinds of technical and financial reports required by the ILO and USDOL. In the Philippines, while 100 percent of BAN Toxics finance and administration staff salaries were charged to the project, the finance officer performed other tasks outside of the project that might have contributed to delays in reporting.²⁰ Another explanation is that the implementing partners did not initially have M&E staff dedicated to collecting data and preparing reports. BAN Toxics eventually appointed a full-time M&E officer late in the life of the project. According to both project staff and implementing partners, an important lesson learned is that partners require a dedicated M&E person to ensure quality reports are submitted on time.

In addition to timely submissions of technical and financial reports, SSF and BAN Toxics experienced high staff turnover that affected, to some extent, project implementation and deliverables. For example, according to the IA, SSF was required to have one program officer for each district and a finance officer with the SSF executive director providing supervision. Immediately after signing the IA, the program officer of Adansi North resigned and was replaced. The program officer for Aowin also resigned right before activities were scheduled to begin. SSF recruited another program officer for Aowin who also resigned after the first training activity leading to the hiring of the third program officer for Aowin.

In the Philippines, BAN Toxics was required to have the project's mining officer, which is a key personnel position, as well as a project coordinator, field coordinator, and administrative assistant for Camarines Norte and South Cotabato. The mining officers turned over two times in December 2017, January 2019. The third mining officer has been in place since February 2019. The communication officer, based in Manila, turned over three times in September 2017, December 2017, and May 2018. The fourth communication officer remained with the project until the IA ended in August 2019.

In Camarines Norte, the project manager resigned in December 2017 to become an advisory consultant. She was not replaced. The project started with two field coordinators. One field coordinator was terminated in December 2016 and the other field coordinator was terminated in April 2018. A third field coordinator who was hired in April 2018 was terminated in August 2018. The administrative assistant resigned in January 2019 and was not replaced. The fourth field coordinator who was hired in August 2018 is currently acting as project manager, field coordinator, and administrative assistant.

In South Cotabato, the project manager and field coordinator resigned in January 2018 and February 2018, respectively. The administrative assistant resigned in February 2019. A second field coordinator who was hired in February 2018, resigned in June 2019. A second project manager was hired in June 2018 and remained in place until the IA ended. Project

²⁰ In response to the draft evaluation report, BAN Toxics noted that the finance officer was tasked with providing financial support to other projects. BAN Toxics also commented that other BAN Toxics staff not charged to the CARING Gold Mining project provided technical support to the project.

staffing issues is discussed in more detail under project management arrangements in Section 3.5.

3.3. Effectiveness of Strategies and Interventions

This section examines the progress the project has made in achieving its end of project performance indicator targets listed in the CMEP. It also addresses three evaluation questions related to effectiveness:

- How effective were the project’s interventions? These include: community child protection committees (Ghana); SHIELD program (Philippines); Compassionate Gold (Philippines); mine formalization/legalization (Ghana and the Philippines); legal and policy (Ghana and the Philippines); supply chain monitoring tools (Ghana and the Philippines).
- How effective was the project’s strategy to involve key stakeholders at the global, national, provincial/district, and local levels in efforts against CL, with a focus on mining? Was ILO’s facilitation role effective and did it create the required synergies among key stakeholders?
- To what extent did the project contribute to helping ASGM households, miners, and communities’ access social protection and livelihood programs?

3.3.1. Project Performance and Achievement of Indicator Targets

Table 3 provides a summary of the achievement of the project’s outcome level indicators. The complete project performance analysis of both outcomes and sub-outcomes using CMEP information appears in Annex F. Note that the analysis is based on validated information provided in the April 2019 TPR. Any indicator target achievements attained after the April 2019 TPR was not considered in the analysis.

Table 3: Summary Analysis of Project Performance

Objective	Indicators	Progress
Development Objective	Number of countries, regional bodies and government institutions, social partners and international civil society groups that take significant actions to reduce CL and improve WC in ASGM	The project targeted 17 countries, government institutions, and civil society organizations to take <i>significant actions</i> to reduce CL and improve WC in the ASGM sector. The project reported an achievement of 16. However, eight of these achievements do not represent <i>significant actions</i> as defined in the CMEP. The evaluation team suggests that the project review the definition of <i>significant actions</i> and reassess the achievement reported. The project should also verify what <i>significant actions</i> were taken by four civil society organization and report them in the next TPR.
Outcome 1	Number of laws, policies, or action plans to address CL and WC in ASGM adopted	The project set a target of six laws, policies, or action plans to be adopted and reported four achieved. The two that have not been achieved are the amendment to the People’s SSM Act and the NAP for ASGM in the Philippines, which are still

	Number of laws, policies, or action plans to address CL and WC in ASGM enforced or implemented	works-in-progress. However, it looks unlikely that the People’s SSM Act will be adopted during the life of the project. The project set a target of eight laws, policies, or action plans to be enforced or implemented and reported three achieved. Those not achieved are the draft amendment to People’s SSM Act, the proposed revisions to the IRR of the People’s Small-Scale Mining Act, and the ASGM NAP. All of these are in the Philippines.
Outcome 2	Number of relevant social protection and livelihood programs introduced or expanded to benefit ASGM communities in project target areas Number of miners and other community members provided with training related to improved livelihood operations	The project set a target of 10 social protection and livelihood programs introduced or expanded and reported an achievement of nine. The one target that was not achieved was financial skills training by NBSSI-BAC for beneficiaries in Ghana because NBSSI-BAC lacked funds. The project set a target of 160 miners and community members to receive livelihood training and reported that 229 was achieved, 69 more persons than targeted. The project significantly exceeded its targets in both countries given the strong interest of community members to receive livelihood-related training.
Outcome 3	Number of monitoring mechanisms in supply chains implemented by ASGM actor	The project targeted six supply chain monitoring mechanisms implemented and reported that three were achieved. The monitoring tools that have not yet been implemented are the WC tools in Ghana, which have been developed but not yet implemented by the MC because they are awaiting approval.
Outcome 4	Percent of targeted global networks operational	The project set a target of seven global networks to be operationalized and reported that four were achieved including ARM, OECD, and the World Bank, resulting in an achievement of 40 percent. While the evaluation team acknowledges that the project has collaborated with these global actors on ASM issues, the evaluators do not believe that this collaboration constitutes operationalizing global networks. Perhaps the indicator should have been stated as the <i>number of global ASM initiatives with whom the project collaborated with and made contributions to on CL and WC in the ASGM sector.</i>

In summary, the project has made progress in achieving its outcome indicator targets in light of delays, especially the mining ban on ASM operators in Ghana. The Ghanaian government placed a ban on small-scale mining in March 2017. The ban was lifted in December 2018 for small-scale miners who register and operate legally, nearly two years after it was imposed. The project made a conscious decision not to implement activities related to mining sites, such as mine safety and health training, in communities during the ban.

Based on the analysis of the CMEP indicator data, the project is on track to achieve nearly all of its indicator targets by January 10, 2020, the new end of project date.²¹ The indicator targets that may not be achieved are those for the development objective and the fourth outcome, the global component. As noted in Table 3, at least seven of the 16 achievements reported under the development objective do not represent significant actions and should not be counted.²² There are another four achievements, as described in the project performance analysis in Annex F, which should be verified and reported in the next TPR.

Regarding the global component, the project has taken important steps after the Manila conference to collaborate with and influence the agendas of key global actors such as Alliance for Responsible Mining (ARM) and the Code of Risk-mitigation for ASM Engaging in Formal Trade (CRAFT) code and Organization for Economic Co-operation and Development's (OECD) responsible mining initiative. According to a World Bank (WB) senior mining specialist, the Bank created a repository for ASGM data sets and documents as requested by the project. Nevertheless, the evaluators do not consider these achievements as operationalizing global networks. The project also reported its collaboration with the OECD Forum for Responsible Mineral Supply Chain as an enhanced platform. The evaluators question whether this collaboration should be counted as an enhanced platform.

Finally, during the CMEP analysis, the evaluation team identified several errors in how indicator targets are calculated and reported that should be addressed in the next reporting period. These are summarized below. A more detailed description is provided in Annex F.

- The indicator for SO 1.2 is the *number of interagency coordination mechanisms implemented*, Ghana reported two mechanisms implemented including collaborating with the Minerals Commission (MC) to develop ASGM monitoring tools. While the ASGM monitoring tools were developed, MC has not yet implemented them, which means they should not be counted as implemented. In the Philippines, the project reported the multi-stakeholder monitoring and certification team in South Cotabato as an implemented mechanism. Although the multi-stakeholder monitoring team was established, it is not functioning and should not be counted.
- The indicator for SO 1.4 is the *percent of stakeholders trained who have an increased score from pre and post-test results and can identify concerns relating to WC and CL in ASGM including OSH*. During the course of assessing this indicator's target achievement, the evaluation determined that instead of reporting the percent of stakeholders who increased test scores, it reported the percent increase in the average test score.

²¹ On October 7, 2019, ILO received a three-month no-cost extension. After the submission of the CARING Gold Mining draft evaluation report, the evaluation team was informed the project received a two-months no-cost extension, pushing the project's end date to March 2020.

²² Refer to the indicator target achievement analysis in Annex F for more discussion on those actions that the evaluators do not consider significant.

- One of the indicators for SO 3.2 is the *number of awareness raising campaigns on CL and WC issues carried out by stakeholders without project support*. The actual indicator target achievement for Ghana should be 14 instead of 12 as reported in the April 2019 TPR.

3.3.2. Effectiveness of Interventions

This section examines the effectiveness of the project interventions implemented in Ghana and the Philippines. The discussion of the effectiveness of the interventions are organized by those implemented in Ghana and those implemented in the Philippines.

Ghana

Legal and Policy Intervention. The project was effective at producing key outputs under the first outcome. These include a combination of policies and action plans. At the national level, the project engaged key government agencies such as MELR/CLU, MLNR/MC, and MGCSP in a highly participatory process to develop National Plan of Action to Eliminate Child Labour (NPA 2) and Multi-Lateral Mining Integrated Project (MMIP).

Funding to implement MMIP appears to be encouraging. MLNR has secured USD 3 million for a Ghana ASM Formalization Project (GASMFP), which aims to conduct various feasibility studies and pilot activities. Funding to implement NPA 2 is less certain despite the government's allocation of approximately USD 90,000 in the 2018 national budget to fight child labor. A representative of MELR's CLU told the evaluators that the implementation of the plan would depend on the extent to which cooperative assistance partners provide technical and financial support.

At the local level, the project also engaged assembly officers in Adansi North district and Aowin municipality in a highly participatory process to develop medium-term development plans as well as CL by-laws in Adansi North. The project provided resources to both local governments to implement awareness raising activities as part of their development plans. While the local governments intend to request funds to fully implement their development plans, the assembly officers for both Adansi North and Aowin told the evaluation team that it would be difficult acquiring all the resources required to implement the plans.

Community Child Protection Committees. Community child protection committees (CCPC) were proposed under NPA 1 to address child labor at the community level. In addition, the new Social Protection Bill proposes to establish community social protection committees by law. Rather than create new community committees, the project decided to build on these initiatives by working with local government officials and community leaders to establish CCPCs in the project's four target communities. The establishment of the CCPCs were based on criteria developed by the government. Each CCPC consists of approximately 15 persons representing key groups in the community such as the traditional council, religious leaders, opinion leaders, assembly members, miners, teachers, women's groups, and youth groups.

The evaluation team found the CCPCs to be highly effective at preventing children from working in the mines or withdrawing them if found to be working in mines. This finding is based on interviews with a range of community members including the traditional council, opinion leaders, teachers, miners, and children. Local government officials also opined that the CCPCs are effective.

Quote from Child Laborer

When the children who work in mines see someone from the CCPC coming, they run the other way. Many children are now afraid to work in the mines because they will be scolded.

Members of the CCPCs operating in the four pilot communities appear to be highly motivated and committed. They appreciate the official identification badges provided by the local government offices because the badges give them credibility in the community. Nevertheless, CCPC members expressed a range of concerns to the evaluators. These include a lack of transportation to travel to mining areas outside the community, lack of rain gear and boots they believe they need when visiting mines, and the lack of an office. Local government officials, on the other hand, told the evaluators that they are committed to helping make the CCPCs productive and will entertain requests for transportation and office space.

Quote from District Officials

The CCPCs are like community child labor police. They investigate child labor cases and tell parents that their children should not work in the mines. They are doing a very good job and we are committed to supporting them.

Mine Formalization. The project's primary effort to assist the ASGM sector move towards formalization has been collaboration with ARM and its CRAFT.²³ CRAFT is a tool that facilitates the identification and mitigation of risks associated with the ASM sector. As described by ARM representatives, CRAFT helps artisanal and SSM make progressive improvements in environmental and social issues.

The project issued an IA to ARM to train GNASSM and key government stakeholders on the CRAFT code, conduct a risk assessment in one project community in Aowin, and develop a report that would inform an action plan including modules to address environmental and social issues identified in the risk assessment. ARM submitted the report to the ILO in July 2019 and is waiting feedback in order to make the necessary changes and finalize the report. GNASSM, which has a membership of about 1,200, is anxious to receive the report and develop an action plan so it can help its members move towards formalization. Although the CRAFT code shows promise, it is too early to say whether it is an effective tool to support mine formalization in Ghana.

²³ <https://www.responsiblemines.org/wp-content/uploads/2018/08/2018-07-31-CRAFT-Code-v-1.0-EN.pdf>

Quote from GNASSM Representative

We believe the progressive, step by step, nature of the Craft code is appropriate for the ASM sector in Ghana. It supports GNASSM’s approach of self-regulation among our members. We intend to train them in the CRAFT tool and encourage them to work towards formalization.

In addition to the CRAFT code, the project, in collaboration with UMaT, conducted training for 50 miners in January 2019. The training focused on mine management, risks associated with using mercury, use of personal protective equipment (PPE), and other safety and health issues related to mining. The evaluation team interviewed miners who participated in the training. The evaluators were able to verify that trained miners were aware of mining safety risks including the use of mercury as well as the importance of using PPE. Nevertheless, during a visit to the Mochekrom Mines Limited site in Sewum, the evaluation team observed that the majority of miners were not using PPE and many were mixing mercury using their bare hands.²⁴

Quote from a Miner in Sewum

We know that we should use boots, helmets, gloves, and other PPEs. We learned that in the training. One problem we have is that they are expensive. The other problem is that using the equipment is uncomfortable when we are in the mines. I wish we had more comfortable equipment.

One issue that miners in Sewum raised with the evaluation team is the use of mercury. The miners noted that they are aware of the health risks associated with using mercury but explained that until there is a mercury alternative, miners believe they do not have an option. This view was consistent with those views expressed during focus group discussions with miners in all four communities targeted by the project. Based on these interviews, the evaluators believe that most will continue to use mercury as long as there is not a viable alternative.

School Clubs and SCREAM. The project, through its IA with SSF, introduced the ILO’s Supporting Children’s Rights through Education, the Arts, and Media (SCREAM) methodology through the formation of school clubs. The project contracted a consultant to train SSF and teachers in the SCREAM methodology. The project established school clubs in four schools in the four communities targeted by the project. According to the teachers, approximately 40 children participated in each club. In addition, according to the Aowin municipal education officer, three more school clubs were established in Aowin schools.

²⁴ The ILO promotes the OSH hierarchy of controls for risk reduction in the workplace. The most effective to least effective includes: elimination of risk, substitution of risk, engineering controls, administrative controls, and use of PPE. The ILO considers PPE to be the last resort for OSH intervention as it is considered to be the least effective and least protective, especially in informal work environments such as ASGM. Nevertheless, the project’s OSH training in Ghana included the use of PPE, which was frequently mentioned by miners in interviews.

Quote from Student

I really like the school clubs and the activities. The debates and quizzes are my favorite. I never use to go to the library to study. Now I go every chance I get to study for the debates and quizzes because I want my team to win.

The evaluators interviewed teachers and children who participate in the school clubs' activities. According to children, the most popular club activities include debates, quiz competitions, drama, singing, and dancing. They credit the clubs and SCREAM methods for increasing children's interest in school. Nearly all the children who were interviewed commented that the school clubs motivated children to attend class rather than to stay at home or even work in the mines.

The teachers told the evaluators that the clubs and activities were responsible for increasing school enrollment. The teacher responsible for the clubs in the junior high school in Sewum explained that before the clubs were introduced, 130 children were enrolled. After the clubs were introduced during the following term, the number of enrolled students increased to 185. The teacher responsible for clubs in the Sewum primary school told the evaluators that enrollment increased from 350 and 471. Once enrolled in school, the teachers also opined that the clubs motivate children to attend classes. Some teachers noted that they noticed improvement in children's self-confidence and self-esteem that they attribute to the club activities.

Despite its effectiveness, school clubs and the SCREAM methodology is tucked away under output 3.2.1. The evaluation team considers the school clubs to be a promising model and a good practice that deserves more attention in project reporting.

Supply Chain Monitoring Tools. Through its IAs with SSF and GNASSM, the project provided technical assistance and funding to develop a range of CL and WC monitoring tools. These include the community registry, CL monitoring tool, and referral mechanism. At the national level, the project worked with the MC to develop a CL checklist tool and *GalamStop* software with CL indicators to be used at the district level.²⁵ At the mine level, several WC tools were developed. These include employer registers, injuries reporting forms, and vendor and machine servicing forms. The evaluators understand that these tools have not yet been implemented.

The evaluators confirmed that the community register, CL monitoring tool, and referral mechanism are being used by the CCPCs. According to CCPC member and community opinion leaders, the community register and the CL monitoring tools are effect at identifying the

²⁵ GalamStop refers to the task force established by the Inter-Ministerial Committee on Illegal Mining (IMCIM) to address galamsey. Galamsey, derived from the phrase "gather and sell", is a Ghanaian term used to describe illegal small-scale gold mining. The term GalamStop is the combination of galamsey and stop or stop galamsey. The GalamStop software is a tool used by the government to monitor small-scale mining licensing and operations and to support the government's community mining strategy. It should be noted that, at the time of the evaluation, the community mining strategy was in the process of being defined and operationalized.

numbers and ages of children in the communities and whether they work in mines. The referral mechanism, on the other hand, is still quite weak because CCPCs seldom receive information from district officials after child laborers are referred. The evaluation team was not able to assess the effectiveness of the MC's CL checklist, Galamstop software, and the mine level WC monitoring tools because they are not yet being used.

Philippines

Legal and Policy Intervention. While the project did not report achievements for laws, policies, and action plans in the April 2019 TPR for the Philippines, the evaluation team confirmed that the project is making progress on four initiatives. These include the ASGM NAP, ASGM roadmaps for South Cotabato and Camarines Norte, local development plans addressing ASGM concerns in project sites, draft amendment to the People's SSM Act, amendment to the revised implementing rules and regulation (IRR) for the People's SSM Act, the IRR for the Act Strengthening Compliance with OSH Standards (RA 11058), and the amendment to the An Act Providing for the Elimination of the Worse Forms of Child Labor and Affording Stronger Protection for the Working Child (RA 9231).²⁶ However, as noted previously, passing the amendment to the People's SSM Act will likely not be achieved during the life of the project due to political opposition to ASGM and the negative impact it has on the environment.

Based on comments from key stakeholders, the evaluators believe that the project worked in a highly collaborative manner with key government agencies including the DENR, DOLE, and DSWD. The project's approach of linking these government agencies to each other to work on key legislation and action plans was especially effective. One example is expanding the ASGM IATWG to include DOLE's Occupation Health and Safety Centre (OSHC). Before the project, the ASGM IATWG did not include an OSHC representative to help ensure that ASGM action plans addressed key CL and WC issues. The OSHC representative is now a critical member of the IATWG.

Quote from DOLE

We think the project did a very good job of creating horizontal linkages between government agencies at the national level and vertical linkages between communities and district offices and their programs. These linkages really did not exist before the project.

SHIELD. The project provided technical and financial assistance to help DSWD develop the Strategic Helpdesks for Information, Education, Livelihood and other Developmental Interventions (SHIELD) against CL initiative. The SHIELD initiative is designed to identify, validate, and withdraw children from CL situations and link their families to government

²⁶ RA 9321 amended RA 7610, otherwise known as the "Special Protection Of Children Against Child Abuse, Exploitation And Discrimination Act"

services including livelihoods, education, health insurance, and medical assistance. DSWD is implementing SHIELD in 15 barangay in four provinces while the project is implementing SHIELD in four of its target communities in Camarines Norte.

Quote from DSWD Representative

In 2016, ILO and DSWD forged a partnership in the conceptualization of the SHIELD against Child Labor project. The project provided technical and financial support for workshops and consultations during the development and implementation of SHIELD. Their support for SHIELD in the pilot communities was very helpful.

Based on its accomplishments as well as interviews with stakeholders, the evaluation team believes that SHIELD is an effective intervention. Since SHIELD was launched in January 2017, DSWD reported that 526 children were validated to be child laborers and 284 have been withdrawn from CL situations. In addition, 730 households have received DOLE livelihood starter kits while another 115 households received education, health insurance, and medical assistance as well as skills training. DSWD representatives believe these social protection services are preventing children from returning to work in the mines.

Quote from SHIELD Staff

SHIELD is highly effective at identifying child laborers and withdrawing them from child labor situations. The major challenges include organizing children and parents for trainings and meetings. People are busy so only about half participate. Another problem is that the SHIELD focal person is also the focal person for other projects. SHIELD really needs a dedicated focal person.

SHIELD consists of a CL monitoring system referred to as the child labor local registry (CLLR). The project supported the development of CLLR including providing computers for seven SHIELD sites in Camarines Norte. According to DSWD, the CLLR software is not yet operational because of database security issues and delay in development of the Data Privacy Manual, which are both required by the Data Privacy Act of 2012. The evaluation team observed DSWD staff in Malaya entering data manually because the software is not functioning. DSWD also told the evaluators that there are not enough SHIELD focal persons in communities to effectively monitor children returning to work in mines. One barangay SHIELD focal person in Gumaus, for instance, covers about 250 child laborers in different sites.

Mine Formalization. The project's approach to mine formalization in the Philippines consists of organizing miners into mining associations, registering the associations with DOLE and LGUs, assisting mining associations to acquire *Minahang Bayan* status and acquire a mining contract so the association can operate legally.

The project has focused its mine formalization efforts in six barangay in Camarines Norte. The project organized four mining associations in Gumaus, Casalugan, Tawig, and Tugos. It also strengthened existing mining associations in Malaya and Dalas. To date, the project assisted Malaya and Casalugan to acquire *Minahang Bayan* status. While the Malaya mining association received *Minahang Bayan* status, it must be awarded a mining contract before it can operate legally. According to the miners, the association must conduct a topographical study as well acquire environmental compliance certification and air and water

certifications. The miners were told by MGB that they will need approximately PHP 750,000 pesos or about USD 15,000 for these permissions.

Quote from Miners from Malaya

We know that the project is ending but we still need help from BAN Toxics and the project to get the environmental certifications and topography study. These certifications and study will cost about PHP 750,000. We do not have that much money so we need help with that too.

Casalugan's *Minahang Bayan* status is provisional pending National Commission on Indigenous Peoples (NCIP) approval. Even if the Casalugan mining association receives *Minahang Bayan* status, MGB requires it to have PHP 10 million or about USD 1.8 million in some combination of assets and cash to be able to acquire a contract and operate legally. Project staff agree that it will be very difficult for the Casalugan mining association to raise PHP 10 million. The mining associations in Gumaus, Dalas, Tugos, and Tawig also must overcome a range of obstacles before they acquire *Minahang Bayan* status. The obstacles include land ownership issues, the PHP 10 million requirement, environmental compliance certification, and air and water certifications. Until all six mining associations receive a mining contract, they will continue to operate illegally under the People's SSM Act.

Although the six mining associations are struggling on their road to formalization, the project was able to register them with DOLE so they are eligible to receive resources to diversify their livelihood strategies as well as other services. One example is the Malaya mining association who applied for and is in the process of receiving a tractor to support its agriculture activities. In fact, the introduction of agriculture to compliment income generated by mining is considered a good practice and discussed in more detail below in Section 3.3.4.

Quote from Miners from Malaya

One of the most important things that the project helped us with is getting registered with DOLE. We gave DOLE a proposal for a tractor that they agreed to give us for our agriculture activities.

An interesting phenomena noted by the evaluators is the number of mining associations that were formed and registered with DOLE in Camarines Norte. The evaluators expected the number to be limited to six, which was the number reported in the April 2019 TPR. Instead, the DOLE provincial director told the evaluators that 17 mining associations were registered, and many are applying for assistance. BAN Toxics staff explained that miners that fall outside the project's targeted areas followed the examples set by the six mining associations assisted by the project and registered with DOLE. The evaluators were impressed with this initiative and believes it shows strong potential to replicate and sustain the links to DOLE livelihood services.

The other set of activities that support the project's mine formalization intervention in the Philippines is related to OSH. The project provided funds to support a mine working conditions and risk study that was conducted by DOLE's OSHC. The study, which is in the

process of being finalized and published, will be used to inform SSM rules and regulations, develop mine OSH checklists, and create mine safety brochures designed for miners.²⁷

Quote from OSH Centre Representative

We took the lead on a research project looking at workplace conditions of miners. We measured workers exposure to noise, chemicals, gases, ventilation system and so forth. The report is being completed and printed. One problem we had is that we do not have a mercury analyzer, which is something we would like the ILO to help us purchase.

The project collaborated with DOLE's OSHC to conduct training for 154 miners and with DOLE's Bureau of Labor Relations to provide freedom of association training to 253 miners in Camarines Norte and South Cotabato. The project also provided training on mercury awareness and mercury free process (gravity concentration) to 134 miners in Malaya, Casalugan, and Gumaus. While the miners found the training useful, focus group discussions revealed that many do not use PPE and continue to mix mercury using their bare hands.

Quote from Miner from T'boli

Gravity concentration is not a very efficient way to separate gold because our gold is more of a powder than nuggets. What we need is an alternative to mercury that is just as efficient. Then we would use it. I am afraid that many miners will continue to use mercury.

The evaluators also noted that the mining associations are not linked to OSHC for future training because, according to one OSHC representative, it cannot formally provide training to SSM who are not operating legally. The other shortfall noted by the evaluation team is that an OSH training manual for ASM does not exist.

Compassionate Gold. Compassionate Gold (CG) is a brand of responsibly sourced gold developed by BAN Toxics. CG should meet a set of environmental and social standards (see box). Furthermore, CG should adhere to international norms such as the Minamata Convention, the OECD's Due Diligence for Responsible Supply Chains, ILO Conventions, and ARM's CRAFT Code. In fact, under its IA, ARM trained BAN Toxics staff on the CRAFT code and conducted a risk assessment in T'boli to specifically inform the CG initiative. ARM has not yet completed the assessment report.

²⁷ Results of the study were presented to the National Occupational Safety and Health Congress in November 2018. Based on these findings, OSHC issued Department Order No. 198 on the IRR for the Act Strengthening Compliance with Occupational Safety and Health Standards (RA No. 1158), which included SSMs in OSH coverage. It specified the rights and duties of employers and workers (even those in small-scale businesses) in ensuring safety and health in the workplace, and identified mining in the list of workplaces commonly associated with potentially high-risk activities.

Compassionate Gold Standards

- ✓ No informal economy
- ✓ No child labor
- ✓ No illegal operations
- ✓ No mercury
- ✓ No contribution to armed conflict
- ✓ Transparent supply chains
- ✓ Decent work conditions

BAN Toxics launched CG at the Philippines Fashion Week in November 2018 and has recently established a CG website and presence on social media platforms. Based on interviews with stakeholders and document reviews, the evaluation team believes BAN Toxics has been able to generate some degree of interest and possibly demand for CG. On the other hand, the evaluators believe the supply side requires a substantial amount of work before CG is available either as a raw product or finished product such as jewelry and accessories. It appears that few if any of the miners operating South Cotabato, where CG is being developed, are able to meet all seven of the CG standards. For example, many miners continue to use mercury, do not meet mine OSH standards, and operate illegally.

In compliance with the London Bullion Market Association, the Central Bank Gold Buying Program guidelines require gold sellers to conform to its Responsible Gold Sourcing Policy and acquire a *Risk Assessment Checklist for Source of Origin*. While this could have reinforced the policy on mercury-free gold production, the Bank has yet to approve the request of the project for a separate repository for responsible gold, and has yet to adopt a monitoring and certification mechanism for ensuring compliance with its standards.

To address both demand and supply side challenges, BAN Toxics, with support from the project, contracted consultants to develop a CG business model and market study. The business model report is still in draft form. The South Cotabato Provincial Environmental Management Office (PEMO), the project's principal government counterpart for the CG initiative, is not entirely satisfied with the draft business model. PEMO opines that the model is too theoretical and does not respond to the immediate needs of the ASGM sector in T'boli.

Quote from PEMO Representative

The CG business model missed the mark. We requested help to see what local jewelers could produce for the local tourism market. Maybe tokens whose cost would be part of the admission fee to parks. We would have preferred to have the funds to conduct the study ourselves.

Supply Chain Monitoring Tools. In the Philippines, the supply chain monitoring tools consist primarily of SHIELD's CLLR and an online mine registration portal. The South Cotabato PEMO developed the idea of an online portal to facilitate fast and efficient application and processing of mining licenses. The project provided funds to contract an information technology consultant to work with PEMO to develop the online portal and database. The consultant is populating the portal with data and PEMO intends to launch it in December 2019. While evidence suggests that SHIELD, including the CLLR, shows promise

to be highly effective, the evaluation team cannot comment on the effectiveness of the mining portal because it is not yet operational.

Another planning and monitoring tool that shows promise is the CBMS. The CBMS was developed in the early 1990s under the Micro Impacts of Macroeconomic Adjustment Policies Project to provide policymakers with information for tracking the impacts of macroeconomic reforms. The LGUs started to use CBMS in 2000 as a tool to develop annual plans and allocate resources. Since CBMS requires surveying every household in barangays, many smaller LGUs decided not to use CBMS because of the high cost to conduct the surveys. However, in February 2019, the CBMS Act was passed making it mandatory for all LGUs to implement CBMS every three years. The CBMS Act will ensure resources are available to LGUs and barangay to conduct surveys and report data.

The project contracted a consultant to develop specific CL questions for the CBMS survey referred to as a CL rider. CBMS with the CL rider was piloted in three barangay in Labo, Camarines Norte. CBMS with the CL rider provided local officials with valuable information about CL that helped them integrate relevant interventions in their local development plans, allowing them to plan and budget resources accordingly. CBMS, especially since it is now mandatory, shows promise to be an effective tool to plan and monitor activities to reduce CL in the ASGM sector and beyond.

Quote from CBMS Network Office

We are very satisfied with our role in the project, although we could have done more with the introduction of CBMS with the child labor rider questions in T'boli, South Cotabato, which could have further enriched the survey questionnaire given the unique needs and conditions of indigenous communities in the province.

It should be noted that the project collaborated with PEMO and other government agencies in South Cotabato to establish the multi-stakeholder monitoring team (MSCMT) that is responsible for verifying that CG standards are met. While the MSMCT has met twice, PEMO explained that it is not operational because there is not a feasible and practical business plan. However, once a business plan is developed with tangible products and markets defined, MSMCT would have the authority to provide incentives such as tax breaks and preferential access to tourism markets.

3.3.3. Effectiveness of the Stakeholder Engagement Strategy and ILO Facilitation

It is important to note that the project did not deliver direct CL services such as livelihoods and education. Rather, the project pursued an engagement strategy that emphasized stakeholder participation and ownership as a means to enhance the effectiveness and sustainability of the interventions. The stakeholder engagement strategy was based on the recognition that the complex issues and challenges facing ASGM can be most effectively addressed by different stakeholders working in collaboration. The evaluators opine that the project effectively convened stakeholders, facilitated dialogue, and encouraged stakeholders to carry out their roles and responsibilities in collaboration with others.

The stakeholder engagement strategy required the project to work with key stakeholders at the community level, provincial or district level, the national level, and the international level. The project piloted activities in a small number of communities to learn, develop models, and create linkages to resources at the local and national levels. The plan was to define models and lessons learned and replicate them at provincial or district levels and, in some cases, at the national level. The plan was also to feed successful models and country experiences from Ghana and the Philippines to international actors such as OECD, ARM, and Global Environmental Facilities (GEF). The project was highly effective at developing models and lessons in the pilot communities. However, the project did not have a strategy to roll-out the models and lessons to other mining areas and communities or share them with international ASGM actors.²⁸

In Ghana, the project effectively strengthened linkages between key government and non-government agencies such as MLNR/MC, MELR, MGCSP, UMaT, local government offices, and GNASSM. These agencies collaborated on the development of various action plans and by-laws designed to address CL and WC in the ASGM sector. The project also linked the CCPCs, schools, and other community structures to district and municipal resources and programs such as school feeding, LEAP, and the NHIS. As discussed in Section 3.3.2, the challenge is an insufficient supply of program resources such as school feeding and LEAP assistance to meet the demand.

Quote from Local Government Service, Ghana

The project has done a good job of addressing child labor and poor working conditions in mines in the four project communities. However, we have thousands of mining communities in Ghana that need assistance. The project should find a way to work with stakeholders to replicate the successes to more communities. If not, the impact is very small.

In the Philippines, the project created linkages between government agencies that either did not exist or were weak. These include linkages between DENR and DOLE to address labor issues in the ASM sector and linkages between DOLE and DSWD to address CL in mining communities including collaboration on the SHIELD initiative. As noted previously, DENR, DOLE, and DSWD collaborated on a range of laws, policies, and action plans to address CL and WC in the ASGM sector. The project also linked miners and mining households to government services such as DOLE livelihood skills training and starter kits, DSWD educational assistance, and medical assistance provided by LGUs.

While linkages and dialogue in the Philippines led to the ASGM sector's involvement in the proposed amendment and IRR to the People's SSM Act, some policies discussed remain unenforced. In the National Coalition Summit on ASGM organized by the project, for instance, the Central Bank was invited to inform SSM associations the Act to Strengthen the Country's

²⁸ It should be noted that the project intended to roll out models through local, national, and global networks. However, as noted previously, this was not achieved due to the delays implementing the global component. Nevertheless the project would benefit from a well-defined and written strategy to roll out models.

Gross International Reserves (RA 11256).²⁹ While the law exempts registered SSM who would sell their gold to Central Bank from paying income and excise taxes, it has not prevented SSM in South Cotabato and Camarines Norte from selling their gold in black markets despite lower prices. According to PEMO officials, black market traders, who buy gold without conditions and requirements, are more accessible to SSM than Central Bank buying stations, thus saving them considerable money on transportation. Moreover, some traders even provide loans to SSM without stringent documentary requirements.

In both Ghana and the Philippines, the project attempted to work with employer and worker organizations with limited results and minimal interaction. In Ghana, the project included the Ghana Employers Association (GEA) in key meetings including the ASGM conference in Manila. However, GEA has little experience or interest in the ASGM sector. Regarding worker organizations, project staff told the evaluators that the idea was to have GNASSM join the Ghana Mine Workers Union (GMWU) so SSM could be represented. To date, GNASSM has not shown interest in joining GMWU.

In the Philippines, the project planned to work with the Employer's Confederation of the Philippines (ECOP). After an initial discussion, the project realized that ECOP did not have experience in the ASGM sector. Instead of ECOP, the project decided focus on the CRAFT Code as discussed above. While the project invited three trade unions to visit ASGM sites to engage in dialogue with miners, only IndustriALL made the visit.³⁰ The visit led to IndustriALL agreeing to lead the dialogue with the Mining Industry Tripartite Council Region V to ensure that ASM sector concerns are heard by the council.

The project implements its global stakeholder engagement strategy under the fourth component, *strengthening global networks to reduce child labor and improve working conditions in the ASGM sector*. Until recently, little progress was made on to strengthen global networks. After a seven-month delay, the project organized a global conference on CL and WC in ASGM sector in Manila in May 2019.³¹ Approximately 70 people, including project staff, representing 38 government and non-government organizations from 17 countries participated in the conference. The purpose of the conference was to provide a platform to discuss solutions to address CL and improve WC in the ASGM sector including sharing experiences and models. The project contracted Levin Sources, a well-known and respected actor in responsible mining and sourcing, to conduct a survey and develop a report on good practices to address CL and WC in ASGM. Levin Sources presented survey results via Skype

²⁹ While RA 11256 was approved in March 2019, the IRR are still being developed.

³⁰ FFW accepted the invitation but it was too late for its representatives to make the visit.

³¹ The Inter-Regional Knowledge Sharing Forum on Child Labor and Working Conditions in ASGM was originally planned for October 2018. The date was moved to February 2019 to give the project enough time to prepare. After the project received the no-cost extension that extended the end date to October 2019, it was decided to move the conference to May 2019.

during the conference, but the good practices report has not been finished. ILO's International Training Centre organized, facilitated, and documented the conference.

After the conference, the project formed a working group consisting of 10 members representing the ILO, USDOL, BAN Toxics, GNASSM, OECD, IndustriALL, UMAT, GEA, Bon Pasteur, and the Tambuhak Sinta Foundation in Indonesia. The primary purpose of the working group is to establish mechanisms to share information and generate peer-to-peer learning. To date, the working group has had three teleconference meetings to discuss how to implement the recommendations from the Manila conference including how to engage with other international networks. About half of the members have been participating in the meetings.

The working group has had preliminary discussions with the WB on the use of its global platform for ASM data referred to as *Delve*. According to the WB's senior mining specialist, the WB has agreed to allow the project to use the *Delve* as a repository for certain data sets and documents. The project also requested that the WB to set up a community of practice on ASGM that, according to the senior mining specialist, the project would have to pay. WB analysts are in the process of determining the cost to establish the community of practice.

3.3.4. Effectiveness of Social Protection and Livelihood Strategies

As explained in the previous section, instead of delivering direct services, the project pursued a strategy that emphasized stakeholder collaboration and created horizontal linkages among stakeholders at the national level and vertical linkages between communities and social protection and livelihood programs and resources at the local and national levels. The effectiveness of these social protection and livelihood linkages are discussed below by country.

Ghana

In Ghana, the project aimed to link the four target communities to government social protection programs that included school feeding, LEAP for cash assistance, and the NHIS for health insurance. The results were mixed. One primary school in Adansi North was enrolled in the school feeding program while a modest number of households in Adansi North and Aowin were enrolled in LEAP. The most successful linkage to social protection services was the work with NHIS on health insurance registrations (see text box).

Collaboration with NHIS

The project collaborated with NHIS to organize a five-day session in Abedwum, Adomanu and Achiase in Adansi North. Approximately 522 persons were registered including 352 renewals and 170 new registrations. The evaluation team discovered that more than one thousand persons were registered in the target communities in Aowin that will be reported in the October 2019 TPR.

In collaboration with NBSSI-BAC, the project trained 106 miners and non-miners on entrepreneurship, financial management, and savings. Focus group discussions with miners and interviews with non-miners revealed that the participants valued the training on how to start a business, some of the financial management tips, and the importance of savings. While

a few people have started income generating activities like food that they sell in local markets, most participants have not started businesses. Miners told the evaluators that their business ideas, such as a guest house or business center, require capital that they do not have. Women who participated in the training explained that they not only require capital but need technical training on to make soap products or cosmetics.

NBSSI-BAC district and national representatives told the evaluators that the training was rushed and did not take advantage of the full range of NBSSI-BAC services. For example, BAC could have provided product specific training along with starter kits. BAC also has an arrangement with EXIM Bank to provide loans for starting small businesses. The provincial BAC representative opined that the project should have developed a 360 degree training and support program that meets the needs as well as opportunities for mining households.

Philippines

In the Philippines, largely through the SHIELD initiative, nearly 90 households in Camarines Norte received educational, medical, and health insurance assistance. In addition, 730 households received livelihood starter kits and another 26 persons received livelihood skills training from DOLE. The evaluators understand that, based on interviews with DOLE and DSWD representatives, the number of households receiving social protection and livelihood support exceeds 1,000, which will be reported in the October 2019 TPR.

The project also formed or strengthened six mining associations and helped them register with DOLE so they can receive social protection and livelihood assistance. The mining association in Malaya actually applied for and is in the process of receiving a tractor from DOLE to support its agriculture activities (see box).

Agriculture Activities in Malaya

Facilitated by the project, members of the Malaya mining association visited the mining association in Rosario located in the province of Agusan del Sur to observe how it developed agriculture to compliment income from its mining operations. Based on the experience, the Malaya mining association, along with the Malaya women's cooperative, developed a diversified agriculture program consisting of coconut trees and coconut products (coconut sugar, candies, and handicrafts) and animal farming including fish, ducks, chickens, and goats.

The project collaborated with the LGUs in Camarines Norte and TESDA to provide vocational training to 50 youth from mining communities targeted by the project. Twenty-five males were trained in plumbing and 25 females were trained in electronics. At the time of the evaluation, 14 males were working in construction in Manila while five females were working at near-by electronics shops. The employment rate for females is quite low. During focus group discussions, female graduates explained that the female employment rate is low for a variety of reasons: Several graduates got married while others' husbands did not permit them to work; a few missed their families and wanted to return home; others noted that they were not interested in electronics

3.4. Efficiency

This section answers the evaluation question:

- Were the project activities efficient in terms of financial and human resources in relation to its results and outputs? What factors, if any, affected efficiency?

To assess efficiency, the evaluation team analyzed expenditure rates and allocation of human and financial resources. They also examined the project's cost efficiency to determine whether the project was implemented in the most cost-effective manner. Factors affecting efficiency are also discussed in this section.

3.4.1. Expenditure Analysis

Table 4 shows the project's expenditure rates for Ghana, the Philippines, and for the global component as well as the overall expenditure rate for the project. The original life of the project was 40 months (December 11, 2015 to April 10, 2019). In February 2018, the project received a six-month no-cost extension that increased the life of the project to 46 months. As of August 2019, the project had spent 84 percent of its total budget over a 44-month period or about 96 percent of the project's life of 46 months meaning that the project is underspent by approximately 14 percent. According to project staff, there is a concrete plan to expend the remaining funds on a multi-stakeholder platform, documentation of good practices, communication activities, continuation of mine formalization in Ghana, and sustainability workshops.

The project requested another three-month no-cost that would extend the project end date to January 10, 2020.³² However, based on the project's average monthly expenditure rate of USD 94,901, the project would need 8.6 months to spend the remaining budget, nearly five months more than the requested extension of three months.

Table 4: Expenditure Rates

Location	Percent Expended
Ghana	86%
Philippines	91%
Global	72%
Total Project	84%

Ghana's budget is about 12 percent underspent. This, in part, can be explained by the mining ban that delayed many activities that were planned to be implemented in project

³² The project requested a three-month no-cost extension, which was being processed by USDOL at the time of the evaluation. After the submission of the CARING Gold Mining draft evaluation report, the evaluation team was informed the project received a two-months no-cost extension, pushing the project's end date to March 2020.

communities. The Philippines budget is underspent by seven percent. The global component’s budget, however, is underspent by 26 percent, which is considerable. The high degree of underspending reflects the slow rate of implementing activities planned under the global component, which is discussed in detail in the analysis of project performance in Annex F.

3.4.2. Allocation of Project Resources

Table 5 shows the allocation of budgetary resources to Ghana and the Philippines as well as those allocated to the global component. Most resources, 41 percent, are allocated to Ghana, which can be explained because the staffing structure in Ghana includes the project director and the project’s finance officer.

Table 5: Allocation of Resources

Location	Percent Allocated
Ghana	41%
Philippines	29%
Global	30%
Total	100%

The allocation of 29 percent to the Philippines seems reasonable. Although the budget for the global component is significantly underspent, the project revision approved in October 2019 calls for the project to use some of the remaining global funds for activities in the Philippines.

Table 6 shows the overall percent allocation of resources to the four project outcomes. It also shows the allocation of resources to the outcomes by country and the global budget. It should be noted that 59 percent of the total budget is allocated to the four outcomes while 41 percent is allocated to program support, travel, studies, monitoring and evaluation activities, equipment, and supplies.

Overall, the project allocated resources relatively evenly among the four outcomes. Ghana allocated more resources to outcomes 1 and 2 while the Philippines allocated more resources to outcome 3. It should be noted that resources to support the global component, outcome 4, are budgeted under the global budget. Two percent budgeted by Ghana is for the establishment of the national network. The Philippines did not budget resources for outcome 4.

Table 6: Allocation of Resources by Outcome and Country

Operating Item	Total	Ghana	Philippines	Global
Outcome 1	19%	36%	22%	0%
Outcome 2	23%	38%	29%	0%

Operating Item	Total	Ghana	Philippines	Global
Outcome 3	31%	25%	50%	15%
Outcome 4	28%	2%	0%	85%

3.3.3. Factors Affecting Project Efficiency

Overall, the project operated in an efficient manner. It produced outputs and achieved outcomes with the planned amount of human and financial resources. The staffing structure, which is described in more detail below under Section 3.5.1, was appropriate. One factor that the evaluation team identified that negatively affected efficiency was the decision to place the project office in Ghana instead of the Philippines. Ghana is an ILO project office that relies on the ILO country office in Abuja, Nigeria for supervisory, administrative, and financial support as well as approvals. The project director reports to the ILO country director in Abuja. The lack of strong administrative and financial support infrastructure in the Ghana project office creates lag times and other inefficiencies. On the other hand, the ILO office in the Philippines is a country office with a country director and strong program, administrative, and financial support as well as a reliable communication infrastructure.

In addition to the location of the project office, the project encountered a variety of events that delayed activities and created certain degrees of inefficiencies that are worth noting. The development of the CMEP took 20 months due to the extended time it took to retrieve data to support the problem analysis and delayed approval by DOL. While staff believe the CMEP process is valuable, its development was long and drawn out, which caused distractions. The CMEP is discussed in more detail in Section 3.5.2.

It took the ILO nearly 14 months to replace the first project director who resigned in May 2017. The current project director was hired in April 2018. According to staff, many key decisions were suspended until the new project director was hired causing inefficiencies.

As discussed in Section 3.2.2, the project's implementing partners, especially SSF and BAN Toxics, experienced high turnover of its key staff. Recruiting new staff and training them as well as the time and effort to establish working relationships with communities and key government stakeholders created inefficiencies. The difficulty that the implementing partners encountered preparing and submitting technical and financial reports in a timely manner created inefficiencies for both the implementing partners as well as for the project's ILO staff.

In Ghana, the most significant event that affected efficiency was the ban on small-scale mining or *galamsey* by the Ghanaian government in March 2017. As noted previously, the ban was lifted in December 2018 for SSM who register and operate legally, nearly two years after it was imposed. However, during the ban, the project made a conscious decision not to implement activities related to mining sites, such as mine safety and health training, in communities during the ban.

In the Philippines, the development of the CG business model was delayed ten months because the consultant hired to develop the model failed to produce an acceptable product. The CG business model is one of the key products that BAN Toxics was unable to deliver under its IA. Philippine national and local elections in May 2019, including pre-election campaigning, also delayed implementation of some activities in communities. Also, political differences among local officials delayed the signing of the Memorandum of Agreement in one of the project sites that negatively affected project implementation.

3.5. Effectiveness of Project Management

This section examines the effectiveness of the project's management arrangements. It begins by discussing the management structure, roles and responsibilities, and overall effectiveness of the management arrangements. This is followed by a discussion of the project's CMEP, which responds to the following evaluation question:

- How were the project's M&E tools (CMEP) and system used and adjusted for project implementation and management?

3.5.1. Management Structure and Responsibilities

The project's main office is located in Accra, Ghana. The management structure in Ghana consists of the project director along with the Ghana staff including the mining officer, child labor officer, M&E officer, administrative assistant, and driver. The project's finance officer is also located in Ghana. The project management structure in the Philippines consists of the child labor officer, who also acts as the project coordinator, M&E officer, administrative and finance assistant, and driver. The project's mining officer for the Philippines is located with the BAN Toxics.

As discussed in Section 3.2.2, the majority of the project activities were implemented by its implementing partners. In Ghana, GNASSM was responsible for coordinating mechanisms at national and local levels and to build capacity and mobilize communities and local and national government actors to address CL and WC in the ASGM sector. SSF was responsible for working with communities and government stakeholders to develop CL monitoring mechanisms. Recently, the project awarded an IA to NECPAD to establish an ASGM national network.

In the Philippines, BAN Toxics served as the project's primary implementing partner and was responsible for activities in Camarines Norte and South Cotabato through an IA with the ILO. The ILO included BAN Toxics in the proposal because BAN Toxics had a presence in mining communities in Camarines Norte and South Cotabato as well as a strong background working with miners on mercury-free technologies.

Based on interviews with project staff and other stakeholders, the evaluation team believes that the project staffing structure is highly appropriate to support the achievement of outcomes in both Ghana and the Philippines. The lead evaluator has evaluated projects where grantees decided to share staff with other projects or assign multiple tasks to staff, which negatively affected implementation. The decision to place full-time mining officers,

child labor officers, and M&E officers in both countries was correct. The only management issue that the evaluation team questions is the decision to place the main project office in Ghana instead of the Philippines, which created inefficiencies as discussed in the previous section.

The effectiveness of using implementing partners is less clear to the evaluators. GNASSM proved to be a reliable and strategic implementing partner given its mandate to support ASM. While SSF struggled with its reporting and a few of its deliverables, it was able to deliver important CL monitoring mechanisms and tools such as the CCPCs and community registry. It is too early to determine the effectiveness of NECPAD. BAN Toxics, on the other hand, struggled with high staff turnover, meeting reporting requirements, and achieving several key deliverables as specified in the IA. Based on interviews with former and current BAN Toxics staff, the evaluators reached the conclusion that the organization faces management challenges that should be addressed so it can continue to make important contributions to the ASGM sector in the Philippines. Given these management challenges, in hindsight, it would have been more effective to place the mining officer position with the ILO given its strategic importance to project implementation.

3.5.2. Comprehensive Monitoring and Evaluation Plan

Project staff opine that the CMEP development process, including its tools, is highly effective. The evaluation team agrees that the rigor of conducting an evidence-based problem analysis, converting the problem analysis into the results framework/theory of change, and then developing the monitoring system including indicators and data collection methods and tools helps ensure that the project will have the intended impact on CL and WC in the ASGM sector. Furthermore, project staff believe that the CMEP process was sufficiently flexible to allow the project to make adjustments. For example, changes to some indicators were made during the project's midterm review process.

The major issue raised by project staff regarding the CMEP development process was the amount of time it took to develop and have the CMEP approved. The first CMEP workshop was conducted in Washington, D.C, in October 2016 while the second CMEP workshop was conducted in Ghana in May 2017. USDOL finally approved the CMEP in July 2018, nearly 20 months after the first CMEP workshop. Although the project implemented activities while the CMEP was being developed, project staff, especially the M&E officers felt that, at times, they were more focused on finishing the CMEP than on implementing project activities.

3.6. Sustainability

The following section examines the project's sustainability strategy as well as the sustainability of key outputs and outcome, which responds to the following evaluation question:

- Which of the project's outputs/outcomes are most sustainable (durable) and transferable to government institutions, the private sector, employers and workers'

organizations, civil society organizations, and communities to support efforts to reduce child labor in gold mining in Ghana and the Philippines?

3.6.1. Project Sustainable Strategy

The project document contains a section on sustainability where four key sustainability elements (resources, capacity, motivation, and linkages to resources) and intentions (referred to as measures) to achieve sustainability are discussed. The sustainability section also includes a sustainability matrix where conditions and actions to sustain each component is described. However, the sustainability matrix, which is quite broad, was never converted into a concrete sustainability plan.

The project intends to update its sustainability strategy and submit it in the October 2019 TPR. However, focusing on sustainability in the last months of the project is very late. Research demonstrates that sustainability is more likely when projects gradually phase out activities and resources and allow partners and beneficiaries to operate independently well before the project ends. A significantly long disengagement process allows local partners and beneficiaries to gain operational experience and confidence. It also allows them to identify replacement resources and create critical vertical support linkages with public and private sector organizations.³³

Overall, the evaluation team believes that, according to the same research noted above, the project has been able to achieve several key sustainability success factors. These include creating ownership among stakeholders of project interventions, building capacity of key stakeholders to implement interventions, creating horizontal and vertical linkages between national, regional, and local actors to promote collaboration and access resources. These sustainability success factors provide a solid foundation on which the project can develop a concrete sustainability plan.

3.6.2. Likelihood of Sustaining Outputs and Outcomes

The outputs and outcomes most likely to be sustained are discussed below by country and the global component.

Ghana

MMIP. The MMIP will likely be sustained based on the support from the World Bank. The MLNR secured USD 3 million for the Ghana ASM Formalization Project, which aims to conduct various feasibility studies and pilot ASM formalization activities. If the results of the feasibility studies and pilots are encouraging, MLNR will likely receive additional funding to

³³ *Sustaining Development: A Synthesis of Results from a Four-Country Study of Sustainability and Exit Strategies among Development Food Assistance Projects*, Gerald J. and Dorothy R. Friedman School of Nutrition Science and Policy at Tufts University, October 2016 <https://www.fantaproject.org/research/exit-strategies-ffp>

implement additional phases thus sustaining MMIP and its results on ASM formalization, including CL and WC, into the future.

Linkages between key stakeholders. The project was able to create linkages between key government agencies and non-governmental organizations such as MLNR/MC, MELR/CLU, MGCSP, MLG, local governments, and GNASSM to focus on and address CL and WC in the ASGM sector. Based on interviews with key stakeholders, the evaluators believe that these linkages are valued by the various stakeholders and will continue once the project ends.

CCPCs in the short to medium-term. For the most part, the CCPCs are motivated and are having success identifying and withdrawing children from dangerous working conditions in the mines. Based on this evidence, the evaluation team believes the CCPCs will continue to function in the short to medium-term once the project ends. Their longer-term sustainability will depend on the level of support provided by the district and municipal offices such as supervisory visits, training, transportation, and office space.

School clubs using SCREAM methodology. The school clubs using the SCREAM methodology is not only effective but shows strong sustainability promise. The teachers and students participating in the school clubs in the four target communities are committed to continuing once the project ends. The district and municipal education offices are interested in replicating the school clubs and SCREAM methodology in other schools but acknowledge they would require training and some financial support.

CL-WC monitoring tools. The community-based CL and WC monitoring tools include the community register, CL monitoring tool, and referral mechanism while the ASGM based WC tools include the employee registers, injuries reporting forms, and vendor and machine servicing forms. MC has also developed monitoring tools such as the checklist and *GalamStop* database. As long as the CCPCs function, they will continue to use the community-based CL monitoring tools while the miners appear to be committed to using the WC monitoring tools. The MC has the resources and commitment to use the CL and WC tools it helped develop.

Action plans and by-laws. The district and municipal level medium-term development plans and by-laws with activities to address CL and WC in the ASGM sector show strong promise of being sustained once the project ends because local governments have requested resources to implement the activities in the plans. Nevertheless, since the demand for resources is greater than the supply, the sustainability of the development plans and by-laws will largely depend on whether the CL and WC related activities are allocated adequate funds.

Philippines

SHIELD. After the initial pilot activities, the government intends to provide resources to roll-out SHIELD to the majority of the provinces as one of its key strategies to withdraw one million children from child labor by 2025. As long as the government maintains its commitment to fund SHIELD, it will likely continue once the project ends.

CBMS with CL rider. Since the CBMS Act was passed making it mandatory for all LGUs to implement CBMS every three years, it is highly likely that CBMS will be sustained since the CBMS Act will ensure resources are available to LGUs and barangay to conduct surveys and report data. However, the CL rider, which was piloted only in few sites, has not been approved by the Philippines Statistical Authority (PSA). If approved, the CBMS with the CL rider will likely be sustained beyond the conclusion of the project.

People's SSM Act Implementation Rules and Regulations. The revised IRR for the People's SSM Act is intended to streamline the mine registration process for SSM effectively reducing the bureaucratic burden placed on them. According to MGB, the revised IRR have been prepared and are in the process of being approved by DENR. Once approved, they become an official departmental order that will be sustained.

Mining associations linked to DOLE. One of the project's successful strategies was to help form and strengthen mining association in six barangay and register them with DOLE so they are eligible for livelihood and other social protection services. The mining association in Malaya actually submitted a proposal to DOLE for a tractor to support its agriculture activities, which was approved by DOLE. These linkages to DOLE livelihood and social protection services should continue once the project ends.

Linkages between key stakeholders. One of the project's main strategies was to link and encourage collaboration between national and local government actors where collaboration did not exist or was weak. For example, the project successfully linked and helped strengthen collaboration between DENR and DOLE and between DOLE and DSWD to address a range of CL and WC issues in the ASGM sector. The Philippine National Coalition for SSM has also been instrumental in strengthening policy coordination and feedback between SSM associations and concerned national government agencies. Based on interviews with these key stakeholders, the evaluators are optimistic that these linkages and collaboration will continue after the project ends.

Online mining portal. In South Cotabato, the online mining portal should be sustained once the project ends given the strong commitment of PEMO to ensure that the portal receives the technical support and resources it requires to facilitate the mining license application and monitoring process. If successful, the online mining portal shows potential to be replicated in other ASM areas.

The outputs and outcomes most difficult to sustain in Ghana and the Philippines are training and awareness raising events that require resources such as honorariums, per diems, meals, and transportation. The training events that will require resources include vocational education, mine safety and health, and entrepreneurship. The awareness raising events that require resources include community durbars, town hall meetings, and IEC activities. The project typically paid the expenses associated with these events that the stakeholders believe it will be difficult to find funds once the project ends.

Global

At the global level, it is difficult to say which outputs and outcomes show the most promise of being sustained due to the slow progress of implementing activities and developing models and lessons. The WB's *Delve* initiative shows strong promise. The WB has agreed to establish a repository for ASGM data sets and documents that does not carry a cost. The WB is also in the process of estimating the cost to establish an ASGM community of practice, which was requested by the project. The community of practice would carry a cost that USDOL or the CARING Gold Mining project would have to pay. If the cost is reoccurring, the project would have to identify a source of funding to cover the reoccurring costs.

The national networking initiative in Ghana shows some degree of promise of being sustained. NECPAD has established the Child Labor and Responsible Mining Network (CLARM-Net) with CLU serving as the secretariat. If the project can link CLARM-Net to at least one global ASGM network, sustainability is a possibility. The challenge, however, is whether CLU can effectively serve as the secretariat since it is also responsible for providing administrative oversight to the implementation of NPA 2 as well as acting as the secretariat for the National Steering Committee on Child Labour (NSCCL) whose composition is similar to that of CLARM-Net. The evaluation team is concerned that CLU could become overwhelmed with oversight of these three initiatives. The project might consider discussing its role as secretariat of CLARM-Net and the effort that would be required to ensure that the CLU does not become overwhelmed.

While the project has collaborated with global mining actors such as ARM and OECD and is coordinating a global working group to follow up on the Manila conference recommendations, it is too early to determine whether these networks and platforms are effective and can be sustained. In the opinion of the evaluators, the global component of the project requires a concise and concrete strategy with specific action steps.

IV. CONCLUSIONS

Following are the evaluation team's conclusions based on the findings. The conclusions are organized according to relevance, project design, effectiveness of strategies and interventions, efficiency, effectiveness of project management, and sustainability.

4.1. Relevance

The project's aim to reduce child labor and improve working conditions in the ASGM sector is well aligned with the needs and priorities in Ghana and the Philippines. The project's first three components, laws and policies, social protection programs, and supply chain monitoring tools meet the needs of the key stakeholders in Ghana and the Philippines. For example, in Ghana, the Children's Act 1998 and the National Policy on Minerals and Mining prohibit children from working in mining. In addition, EPA is developing a NAP for the ASGM sector for the implementation of the Minamata Convention on Mercury.

In the Philippines the Anti-Child Labour Law and the Guidelines in Assessing and Determining Hazardous Work in the Employment of Persons Below 18 Years of *Age* prohibit children from working in hazardous industries such as mining and quarrying. Furthermore, the Philippines set a goal to withdraw one million children from child labor situations by 2025. Regarding working conditions, a working group is preparing a plan to address the use of mercury based on the Minamata Convention on Mercury. The projects focus on reducing CL and improving WC align well with these laws and policies.

It is unclear whether the global network component is meeting the needs of global stakeholders because it has been delayed and has only recently gained momentum. Under this component, the project aims to identify, consult, and strengthen, as appropriate, networks at the national, regional, and global levels so they can serve as platform for sharing good practices, lessons, and innovations on how to address CL and improve WC. The project organized a global conference in Manila on CL and WC in ASGM sector and has established a small international working group that has met three times to follow up on the conference's recommendations including the sharing of lessons. The project also established a national network in Ghana that is not yet fully operational.

4.2. Project Design and Validity

The project has been implemented according to the project design and the achievements are consistent with the project's theory of change. Anecdotal information gathered during the evaluation suggests that three of the project's components, including their strategies and interventions, are contributing to reducing CL and improving WC in the ASGM sector. These include laws, policies, and action plans addressing CL and WC in ASGM, linking households to livelihood and social protection services, and implementing CL and WC supply chain monitoring tools. As explained previously, due to delays, it is too early to determine whether the global network component is contributing as intended in the theory of change.

Key factors that have positively affected the theory of change is the degree of collaboration and participation of key stakeholders in developing laws and action plans, accessing livelihood and social protection services, and developing supply chain monitoring tools. The project's strategy to create horizontal linkages among national stakeholders and vertical linkages between national and local stakeholders and linking communities to government resources was effective. Those factors that negatively affected the theory of change include the ban on small-scale mining in Ghana, uncertain availability of financial and human resources to implement action plans, limited social protection resources, no acceptable alternative to mercury, and limited technical and financial support to help SSM comply with stringent contract requirements so they are able to operate legally.

Overall, the project's implementing partners performed as envisioned in the project design. Nevertheless, partners in Ghana and the Philippines struggled meeting ILO technical and financial reporting timelines. They also were unable to deliver all the products specified in their IAs. While these performance issues caused delays and contributed to inefficiencies, they did not have a major negative affect on the theory of change.

4.3. Effectiveness of Strategies and Interventions

The project has made progress in achieving its outcome indicator targets considering delays, especially the mining ban on ASM operators in Ghana, and appears poised to achieve nearly all its indicator targets by January 10, 2020. The indicator targets that may not be achieved are those for the development objective and the global component.

The project has implemented a variety of interventions under each component that have been effective. The CCPCs and school clubs using SCREAM methodology in Ghana and SHIELD in the Philippines are highly effective interventions. Key supply chain monitoring tools such as community registers and the CL monitoring tool in Ghana and the CLLR and the CBMS with the child labor rider in the Philippines appear to be effective.

While the project made important progress on national and local action plans in Ghana and the Philippines, their effective implementation will depend on the availability of scarce resources, especially in Ghana. The amendment to the Small-Scale Mining Act in the Philippines will likely not be passed before the project ends. Despite major obstacles for ASM to formalize and operate legally, the project made some progress on improving WC in mines although the adoption of mercury-free methods is low. The project contracted ARM to introduce the CRAFT code as a progressive process to address environmental and social problems but it is too early to determine its effectiveness.

While the launch of BAN Toxics' Compassionate Gold created interest and demand, the supply side requires a considerable amount of work. For example, many of the SSM in South Cotabato where CG is being piloted are not able to meet CG standards. In addition, the products, markets, pricing, and promotion strategies have not been defined. One of BAN Toxics' deliverables under its IA was a CG business model that should have addressed these supply side issues. The CG business plan was not completed before BAN Toxics' IA expired.

The project effectively convened local and national stakeholders, facilitated dialogue, and encouraged stakeholders to carry out their roles and responsibilities in collaboration with others through its stakeholder engagement strategy. The project effectively piloted activities in a small number of communities to learn, develop models, and create linkages to resources at the local and national levels. However, the project does not have a strategy in place to effectively roll-out the models and lessons to other mining communities. The project's stakeholder engagement strategy at the international level, the global component, has only recently gained momentum making it difficult to comment on its effectiveness.

Overall, the project's strategy to link ASGM communities and households to livelihood and social protection services has been effective. In Ghana, the project was most successful at linking project communities to NHIS and getting large numbers of persons registered for health insurance. The project attempted to link primary schools to school feeding and livelihood services has been less effective due to a lack of government resources. In the Philippines, the project successfully linked project communities to DOLE and DSWD to receive range of livelihood and social protection services.

4.4. Efficiency

The project has been implemented in an efficient manner. The planned amount of financial and human resources has been adequate to produce the planned outputs and outcomes. However, the project's total budget is underspent by approximately 14 percent while the global component's budget is underspent by 26 percent, which is considerable. Based on the project's average monthly expenditure rate, it would need more than eight months to spend remaining funds or about five months more than the anticipated project end date of January 10, 2020³⁴.

Although the project operated in an efficient manner, a variety of factors have created inefficiencies as summarized below:

- The decision to place the project office in Ghana, which is an ILO project, instead of the Philippines, which is an ILO country office.
- The development of the CMEP took 20 months that was long and drawn out, which caused distractions.
- It took the ILO nearly 14 months to replace the first project director during which time key decisions were suspended.
- Several implementing partners experienced high turnover of its key staff and encountered difficulty submitting technical and financial reports in a timely manner and achieving deliverables required in the IAs.

³⁴ It should be noted that after the submission of the CARING Gold Mining draft evaluation report, the evaluation team was informed the project received a two-months no-cost extension, pushing the project's end date to March 2020.

- In Ghana, the ban on small-scale mining that lasted nearly two years delayed mining-related activities planned in the target communities.
- In the Philippines, the CG business model development was delayed 10 months and never fully completed before BAN Toxics IA ended.

4.5. Effectiveness of Project Management

The project's staffing structure was appropriate to achieve the outcomes in Ghana and the Philippines. The decision to hire child labor officers, mining officers, and M&E officers in both countries contributed to effective project implementation and was the correct decision. On the other hand, the effectiveness of using implementation partners is mixed. While GNASSM proved to be a reliable and strategic partner, SSF encountered problems with staff turnover and meeting deadlines for technical and financial reports. In the Philippines, BAN Toxics also struggled with high staff turnover, meeting reporting requirements, and achieving several key deliverables.

The CMEP development process, including its tools, is highly effective. The CMEP was also sufficiently flexible to allow the project to make adjustments during the midterm review of the project. While the CMEP is effective and flexible, the CMEP development process took nearly 20 months that created inefficiencies by interfering with implementation.

4.6. Sustainability

While the project document contains a section on sustainability that includes sustainability elements along with a sustainability matrix, they were never converted into a concrete sustainability plan to provide a roadmap to sustaining key outputs and outcomes. Despite not having a sustainability plan, the project has managed to achieve several key sustainability success factors that lay the foundation for sustainability. These include creating ownership among stakeholders, building their capacity, creating horizontal and vertical linkages between stakeholders to promote collaboration and access to resources.

On the one hand, those outputs and outcomes that are most likely to be sustained once the project ends in Ghana include the MMIP, linkages between key stakeholders, CCPCs in the short to medium-term, school clubs using SCREAM methodology, use of CL-WC monitoring tools, and national and local level action and development plans. Those outputs and outcomes most likely to be sustained in the Philippines include SHIELD with the CLLR, CBMS with the CL rider, revised IRR to the People's SSM Act, mining associations linked to DOLE, linkages between key stakeholders, and the online mining portal. At the global level, the WB's *Delve* that will host an ASGM repository for data sets and documents shows strong sustainability promise.

On the other hand, those outputs and outcomes most difficult to sustain in both countries are related to training and awareness raising. The project paid for honorariums, per diem, transportation, and IEC materials that key stakeholders will have trouble replacing once the project ends.

V. LESSONS LEARNED AND GOOD PRACTICES

This section lists and discusses lessons learned and good practices that could benefit similar projects and addressed the following lessons and good practices evaluation question:

- What are the best promising practices and lessons learned that could benefit similar projects (including the SHIELD program, mine formalization/legalization, Compassionate Gold, child protection committees, and information-sharing at the global level)?

5.1. Lessons Learned

- ***Deep involvement and participation of key stakeholders creates ownership that contributes to sustainability.*** This includes involving key stakeholders in developing policies and action plans, providing training, developing tools, and participating in community events such as trainings, townhall meetings, and durbars. Key stakeholders in both Ghana and the Philippines believe they own project outputs and outcomes. As discussed in the sustainability section, research shows that ownership helps ensure that those outputs and outcomes are sustained.
- ***Creating horizontal linkages between key national stakeholders and vertical linkages between national and local stakeholders on ASGM increases effectiveness and efficiency.*** The project effectively created horizontal and vertical linkages. These linkages created collaboration and promoted partnerships between key government and non-government actors involved in the ASGM sector. Collaboration and partnerships, on the other hand, encouraged effectiveness and efficiency by focusing scarce resources and avoiding duplication of efforts.
- ***It is appropriate to use the CRAFT code as a continuous improvement process to achieve formalization for the ASGM sector.*** As described in Section 3.3, the mine formalization requirements in Ghana and the Philippines for SSM are very difficult to meet. The CRAFT's emphasis of progressively addressing environmental and social problems is appropriate for the ASGM sector since many SSM lack resources required to achieve full formalization. The challenge, however, is convincing governments to allow SSM to operate legally if they are involved in implementing the CRAFT code. One way to address this challenge is to provide provisional "legal" operating status to SSMs who participate in Craft. To maintain the provisional status, SSMs would be required to demonstrate progress in achieving environmental and social benchmarks in the Craft process. This could be done as part of the implementation the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- ***Behavior change related to mine OSH requires access to viable and acceptable options.*** The project provided mine OSH training that increased awareness but may not have resulted in behavior change such as the use of PPE and the adoption of

mercury-free methods.³⁵ Miners believe if they were provided feasible options to mercury or financial help to purchase *comfortable* PPE, they would make these behavior changes. The lesson is that to bring about behavior change that reduces workplace risk such as the use of mercury-free methods or the use of PPE, miners require ASGM-functional, accessible and affordable options in order to adopt new and safer behaviors. Even the elimination or substitution of mine-related risk factors or the introduction of engineering and administrative controls might not be feasible in many ASGM operations.

- ***Future projects implemented or funded by the ILO and USDOL might consider what viable and acceptable options exist for the desired behavior change.*** For example, the project could conduct a barrier analysis -- a rapid assessment approach to identify the determinants of behavior. The findings could be used to inform more effective behavior change communication messages, strategies, and supporting activities that respond to the skills and knowledge, ideational, or environmental factors that influence mine OSH practices. The project could also consider a human-centered approach, such as design thinking or Positive Deviance, whereby the specific experience and needs of ASGM workers would be used to identify or develop tailored solutions to their specific needs.
- ***Implementing partners should have a dedicated M&E and finance officers to facilitate reporting.*** Several of the project's implementing partners in Ghana and the Philippines experienced problems meeting ILO quality and deadline requirements for technical and financial reporting. One explanation is that the partners did not have qualified and dedicated M&E and finance officers to ensure accurate and timely reporting. Having qualified and dedicated M&E and finance officers should help implementing partners meet quality and deadline requirements while freeing up project managers and field coordinators to focus on implementation rather than on reporting. Based on this experience, future ILO and USDOL projects that rely on local implementing organizations to implement activities might consider requiring that a dedicated M&E officer be *key personnel* who are essential to support timely and quality technical reporting. In addition, the M&E officer should receive periodic training on project monitoring, reporting, and monitoring tools.³⁶
- ***For regional or global projects like CARING Gold Mining, it is important to locate the project office, including the project director and key technical and administrative support staff, in an operating environment where it receives effective administrative and financial support.*** The CARING Gold Mining project was located in Ghana, which

³⁵ As noted previously, the ILO promotes the OSH hierarchy of controls for risk reduction in the workplace and considers PPE to be the last resort because it is considered to be the least effective, especially in informal work environments such as ASGM.

³⁶ One possible monitoring tool is the CMEP for Everyone developed under the USDOL Somos Tesoro project. CMEP for Everyone simplifies the CMEP and reporting process for M&E staff as well as the project's technical staff.

is an ILO project office that relies on the ILO country office in Abuja, Nigeria for supervisory, administrative, and financial support as well as approvals. The lack of strong administrative and financial support infrastructure in the Ghana project office created inefficiencies including lag times for decision-making and other delays. The preferred option would have been to locate the project office in the ILO country office in the Philippines that has a country director and strong program, administrative, and financial support as well as a reliable communication infrastructure. In future regional or global projects that rely on a centralized project office to management the project, the ILO and USDOL should ensure that the project office is place in a location where it receives effective and efficient administrative and financial backstopping.

5.2. Good Practices

Good practices that apply to Ghana and the Philippines:

- ***Building on existing structures.*** The project, to the extent possible, built on existing structures rather than create new ones. For example, rather than establishing new community committees to address child labor in Ghana, the project used the CCPCs, which are required by NPA 2. In the Philippines, the project used the CBMS to incorporate child labor rider questions and built the CLLR into the SHIELD initiative. The extent to which the ILO and other USDOL implementing organization can build interventions into existing and funded structures, their likelihood of sustainability will be increased. Interventions that depend on project support and funding are less sustainable and should be avoided if possible.
- ***Alignment of local government plans and resources with community needs and priorities.*** The project worked closely with local governments to help ensure local government development plans are aligned with community needs and priorities. The process included facilitating meetings and dialogue between local government representatives and community formal and informal leaders. The intention was to help ensure that local government plans and resources are aligned with and linked to communities based on the needs and priorities of those communities. This is considered a good practice that the ILO and other USDOL implementing organizations should replicate in future projects that aim to strengthen local government structures and make them more responsive to communities they serve.
- ***Using stakeholders to conduct training and develop tools.*** To the extent possible, the project used stakeholders to conduct training and develop tools rather than hire outside consultants. In Ghana, MELR/CLU provided child labor training for government representatives in Adansi North and Aowin, MC developed the checklist monitoring tool, and NSSI-BAC conducted entrepreneurship training for miners and households. In the Philippines, LGU and TESDA provided vocational training while DSWD and CBMS Network Office took the leads for developing SHIELD, including the CLLR, and the CBMS child labor rider, respectively. The stakeholders believe taking the responsibility for training and tool development in both countries increased capacity and helped create ownership. While not always feasible, the ILO and other USDOL implementing organizations might examine and identify opportunities to

involve government agencies and its social partners to deliver training and develop tools rather than contracting outside consultants.

- ***School clubs and SCREAM methodology.*** The decision to establish school clubs and introduce the SCREAM methodology in Ghana was found to be effective and sustainable. Teachers, students, and community leaders credit the school clubs for increasing school attendance and enrollment and reducing the number of children who work in mines. Teachers intend to continue the clubs once the project ends and district education officers are interested in replicating the clubs and SCREAM methodology in other schools. In addition, the school clubs could be replicated in other communities as the project rolls out interventions to more mining communities in both countries. Furthermore, the ILO and USDOL might consider including school clubs and SCREAM or similar methodologies in other CL prevention projects that have a school component.
- ***GNASSM as a platform to address responsible mining including child labor and working conditions.*** GNASSM is the most important organization in Ghana dedicated to the ASM sector. GNASSM, with 1,200 members, has proven to be an effective mechanism to reach SSM with specific actions to address CL and WC as well as to offer processes such as the CRAFT code to help SSM achieve formalization. The decision to involve an organization that represents the ASGM sector was the right decision and should be considered a good practice.
- ***SHIELD.*** While the SHIELD concept was developed by DSWD in the Philippines, the project provided valuable technical and financial support to develop the concept into the SHIELD initiative, develop the CLLR, provide computers, and pilot SHIELD in four project communities. Based on experience in the pilot communities, SHIELD appears to be effective at identifying, validating, and withdrawing children from child labor situations as well as linking child laborer households with government services. The government intends to use SHIELD as one of its primary strategies to withdraw one million child laborers by 2025. Based on the findings related to SHIELD, the evaluators opine that it is a good practice and could serve as a model that ILO and USDOL could apply to other CL prevention projects that have CL monitoring and withdrawal interventions.
- ***CBMS with CL rider.*** The project collaborated with CBMS Network Office in the Philippines to pilot CBMS with CL rider in a project site that provided the LGU with profiles and conditions of child laborers and their families, contributing to their deeper understanding of CL issues in ASGM. The pilot results prompted LGU decisionmakers and implementers to identify appropriate CL and WC interventions in their local development plan and allocate resources in their budgets as part of the LGU's annual investment program. The CBMS with CL rider can and should be implemented in more sites once approved by PSA. In addition, the CBMS and CL rider could serve as a model to incorporate CL questions in data collection systems such as labor force surveys in other countries where the ILO and USDOL are implementing or funding CL prevention projects.

- ***Transformation of Malaya.*** The evaluation team considers the transformation of Malaya to be not only a good practice but a case study for how poorly managed ASGM operations can be transformed. In 2015, Human Rights Watch (HRW) produced a documentary based on interviews with children in Malaya.³⁷ HRW found that children worked in unstable 25-meter-deep pits, mined gold underwater, along the shore, or in rivers, with oxygen tubes in their mouths (compressor mining). They also processed gold with mercury risking irreversible health damage from mercury poisoning. HRW also documented local rivers and streams colored milky white from mercury contamination. The project provided technical assistance to the Malaya mining association to adopt mercury-free ore processing and education on why child labor is detrimental to children and families. The project also organized a visit to another mining community to learn about agriculture.

As a result of the project interventions, the Malaya mining association decided to use mercury-free methods (gravity concentration), ban children from working in the mines and provide them with education opportunities, and improve working conditions in the mines.³⁸ The association also decided to invest in diversifying its livelihood strategy by introducing agriculture such as coconut trees and coconut products and animal farming such as ducks, chickens, goats, and fish. Malaya has served as a case study for how SSM can make transformations.

Malaya can serve future ILO and USDOL CL prevention projects with important lessons and examples of how mining communities with a history of CL and environmental problems can transform themselves by addressing these issues with creative and focused actions. The evaluators consider Malaya to be a candidate for a case study activity to identify and document the factors that contributed to the transformation, which can be applied to similar situations in other projects implemented or funded by the ILO and USDOL.

³⁷ <https://www.hrw.org/report/2015/09/29/what-if-something-went-wrong/hazardous-child-labor-small-scale-gold-mining>

³⁸ The project re-introduced gravity concentration to the mining association, which it improved it through the use of mechanized technology and improved extraction structures and process.

VI. RECOMMENDATIONS

The following **recommendations** are intended to provide the ILO and USDOL with suggested actions that can further strengthen project outputs and outcomes and increase the potential for sustainability given the project is scheduled to end in approximately three months.

USDOL Recommendation

6.1. Comprehensive Monitoring and Evaluation Plan

USDOL should determine ways to decrease the amount of time it takes to develop and approve the CMEP. The lead evaluator either evaluated or managed five evaluations of USDOL project over the past three years where staff of the projects being evaluated expressed concerns about the complexity and length of the CMEP development process. One way to streamline the CMEP development is to provide more templates or boiler plates where project staff can insert information rather than create sections of the plan from scratch. To determine ways to streamline the CMEP development process, USDOL might form a CMEP technical working group consisting of qualified M&E officers of current USDOL funded projects who have been involved in developing CMEPs. The CMEP technical working group should be able to provide practical ways to decrease complexity and time while preserving the rigor of the CMEP and its tools.

ILO Recommendations

6.2. Two-Year Cost Extension

The ILO should request a two-year cost extension to roll-out models and lessons to other ASGM communities, strengthen the global component, and implement the sustainability plan. The project experienced a range of delays, including the ban on ASGM in Ghana, which slowed project implementation. The project developed a variety of effective models and lessons that have been applied in a small number of targeted ASGM communities that have the potential to reduce CL and improve WC in many more ASGM communities. The project has made limited progress on the global networking components. Furthermore, while the project has a broad sustainability strategy, it has not yet developed and implemented a concrete sustainability plan that will require sufficient time. The two-year cost extension will allow the project ample time to implement the roll-out strategy and plan for models and lessons (recommendation 6.2) and the sustainability plan (recommendation 6.3). The extension will also provide time to develop and implement improvements to the global networking component (recommendation 6.6). In short, the two-year cost extension will allow time for the project to realize a greater return on its initial investment in reducing CL and improving WC in the ASGM sector.

General Project Recommendations

6.3. School Clubs and SCREAM Methodology

The project should give the school clubs and the SCREAM methodology a more prominent profile in its reporting. The evaluation found that school clubs using SCREAM methodology to be an innovative and effective intervention to decrease the number children working in mines and, at the same time, increase school attendance and enrollment. The school clubs also show strong promise of being sustained. Therefore, the project should document and showcase the success the school clubs are having in relation to CL and WC in its reporting, possibly as case studies. Since the school clubs provide an innovative solution to reduce CL and improve WC, the project should move this intervention to Output 2.1.1 and report its achievements alongside social protection, livelihood, and mine formalization interventions.

6.4. Malaya Documentary

The project should develop a documentary on Malaya showcasing the improvements the mining association made to reduce CL, improve WC, and mitigate environment damage caused by mining operations. The 2015 HRW documentary highlighted the use of children in dangerous and unhealthy working conditions in the mines, use of mercury in ore processing, and environmental damage to streams and rivers. Since the HRW documentary, Malaya has undergone a transformation. The community is aware that children should not be working in the mines. As a result, the use of child labor is rare. The mining association has shifted from using mercury to gravity concentration to separate gold and implemented other safeguards to protect streams and rivers from tailings run-off. In addition, the mining association and women's cooperative have diversified their livelihood strategy by investing in agriculture such as coconut trees and coconut products and animal farming including fish, ducks, chickens, and goats. Malaya is a case study of how ASGM communities can transform themselves and should be documented and shared so other ASGM communities might learn.

6.5. Roll-Out Strategy and Plan for Models and Lessons

The project should work with its key stakeholders in a participatory manner to develop a strategy and plan to roll-out successful models and lessons to more mining communities in the current targeted districts and provinces as well as communities in new districts and provinces. The project has developed a range of effective models and accumulated important lessons that have benefitted four mining communities in Ghana and seven mining communities in the Philippines. Some of the successful models include the CCPCs, school clubs using SCREAM methodology, and linkages to NHIA in Ghana and SHIELD with the CLLR, CBMS with the child labor rider, and linkages to DOLE livelihood services in the Philippines. To increase the impact that these models are having, the project should implement them in more ASGM communities, which requires a concrete strategy and plan. The roll-out strategy and plan should list the models and lessons to be rolled out, identify and target ASGM districts or provinces and communities along with the key stakeholders, and develop concrete action steps that the project and local partners will take to implement the models and lessons.

6.6. Sustainability Plan

The project should work with its key stakeholders in a participatory manner to develop a sustainability plan that provides a clear roadmap to sustainability during the final months of the project. The project has developed broad sustainability elements and matrix. In addition, it has achieved important sustainability success factors such as ownership, capacity, and horizontal and vertical linkages. These provide a solid foundation on which to build the sustainability plan. The sustainability plan should define the output or outcome to be sustained, the strategy along with concrete action steps to sustain each output or outcome, the government agency or partner organization responsible for the different strategies and action steps, the timeframe for implementing the strategies, and the required resources to implement the strategies. The sustainability plan should also include a set of indicators or benchmarks to measure progress in implementing the plan.³⁹

6.7. Indicators for Development Objective and Sub-Outcomes

The project should review indicators for the development objective and sub-outcomes 1.4 and 4.1 as explained below:

Development Objective: The project should review the definition of significant actions in the CMEP and reassess how it is counting indicator target achievements. The indicator is stated as the *number of countries, regional bodies and government institutions, social partners and international civil society groups that take significant actions to reduce CL and improve WC in ASGM*. The evaluators believe that at least eight of the 16 achievements reported under the development objective do not represent significant actions as defined in the CMEP and should not be counted. There are another four achievements, as described in the project performance analysis in Annex F, which should be verified and reported in the next TPR.

SO 1.4: The project should review how the indicator for SO 1.4 is calculated and reported to ensure that it is consistent with the CMEP's performance monitoring plan (PMP). The indicator is stated as *percent of stakeholders trained who have an increased score from pre and post-test results and can identify concerns relating to WC and CL in ASGM including OSH*. In Ghana, the project calculated the percent of stakeholders who have increased test scores but reporting the percent increase of knowledge on child labor issues. In the Philippines, the project calculated and reported average increases in test scores instead of the percent of stakeholders who improved test scores.

SO 4.1: The project should consider restating the indicator to more accurately measure the achievement of SO 4.1. The indicator is stated as the *percent of targeted global networks operational*. While the project has achieved important collaborations with international organizations such as ARM, OECD, and the World Bank, the evaluation team does not believe that this collaboration constitutes operationalizing global networks. One way the project

³⁹ Note that the indicators or benchmarks are intended to measure progress in implementing the plan but are not meant to measure sustainability.

might restate the indicator as the *number of global ASM initiatives with whom the project collaborated with and made contributions to on CL and WC in the ASGM sector.*

6.8. Global Component Revision

If the request for a two-year cost extension is approved, the project should revise the global component by defining precisely what the component is intended to achieve in terms of reducing CL and improving WC in the ASGM sector outside the two target countries of Ghana and the Philippines. To date, the project has implemented important actions under the global component including the Manila conference on ASGM and establishing a repository on the WB's *Delve* for ASGM data sets and documents that can be easily shared. On the other hand, it is less clear to the evaluators what the project is trying to achieve by operationalizing global networks (OTC 4) and enhancing platforms (SO 4.1). One way to provide definition to the global component would be to determine a set of very specific and focused actions that can be taken to reduce CL and improve WC with those global actors that the project has already engaged such as OECD's forum for responsible mineral supply chain, ARM's Craft code, WB's *Delve*, and the ILO's CL Platform.⁴⁰ The revision should result in more specifically stated outcomes and outputs, indicator targets, and activity mapping.

6.9. Study on Female Employment

If the two-year cost extension is approved, the project should conduct a study to determine why the employment rate for females who were trained in electronics is so low and what actions the project, TESDA, and LGUs can take to increase employment rates. Currently, only five of the 25 females trained in electronics are employed. Not only has the investment in training been lost, but the females who are not employed are not able to contribute to increasing household income, which, according to the project's TOC, can reduce the need for children in the household to work in mines.

Country-Specific Project Recommendations

6.10. OSH Training for SSM

In the Philippines, the project should assist OSHC to develop an OSH training manual and plan that meets the needs and priorities of miners operating in the ASGM sector. This will help medium to high risk establishments such as small-scale mining associations comply with the OSH standards including training for workers, as specified in the IRR of the Act Strengthening Compliance with Occupational Safety and Health Standards (RA 1105). The project should also link OSHC to MGB and the LGU database of small-scale mining associations to enable it to develop and fund a training program that fully covers the ASGM

⁴⁰ ILO makes the point that it is a founding member of the Inter-Organizational Programme for the Sound Management of Chemicals (IOMC) and through this engagement participates in the IOMC mercury working group with several other UN agencies, including WHO, UNEP, UNITAR, UNIDO, UNDP. Therefore there are significant opportunities for multi-stakeholder engagement and networking.

industry. The ILO (SECTOR) has been working for the ratification and implementation of C176 - Safety and Health in Mines Convention, 1995 (No. 176) as well as the Code of Practice for open pit mines that could be important inputs to the OSH training manual and plan. The project should determine whether ILO's SECTOR and LABADMIN/OSH could support the team that will be working on the OSH training manual and plan.

6.11. T'boli Gold Business Plan

The project should hire a consultant with business planning experience to work closely with key stakeholders in South Cotabato to develop a business plan for T'boli gold. BAN Toxics developed a draft business model for Compassionate Gold (CG) that is very theoretical and does not meet the needs of key government stakeholders in South Cotabato. Since it will be difficult for SSM in the T'boli area to meet all the CG standards, the business plan should define the standards that miners should strive to meet. One option would be to start with child-labor free gold and work progressively toward the seven standards of CG using the Craft code tools. The business plan should define the products (raw gold or finished products such as jewelry), markets (such as tourists that visit the T'boli area), product pricing and sales (such as including gold or silver souvenirs in the price of tourist sites), and promotion and capacity building strategies. Key stakeholders that should be involved or consulted during the development of the business plan include PEMO, T'boli mining association, and T'boli jewelry association. The project might also link PEMO to the University of Philippines's Department of Science and Technology and its holistic approach to mercury-free and cyanide-free gold mining.

ANNEXES

Annex A: Terms of Reference

Terms of Reference

Final Independent Evaluation

Convening Stakeholders to Develop and Implement Strategies to Reduce Child Labor in Artisanal and Small-Scale Gold Mining

BACKGROUND AND JUSTIFICATION

The Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) is an office within the Bureau of International Labor Affairs (ILAB), an agency of the U.S. Department of Labor (USDOL). ILAB's mission is to promote a fair global playing field for workers in the United States and around the world by enforcing trade commitments, strengthening labor standards, and combating international child labor, forced labor, and human trafficking.

OCFT works to combat child labor, forced labor, and human trafficking around the world through international research, policy engagement, technical cooperation, and awareness-raising. Since OCFT's technical cooperation program began in 1995, the U.S. Congress has appropriated funds annually to USDOL for efforts to combat exploitive child labor internationally. This funding has been used to support technical cooperation projects in more than 90 countries around the world. Technical cooperation projects funded by USDOL support sustained efforts that address child labor and forced labor's underlying causes, including poverty and lack of access to education.

This evaluation approach will be in accordance with DOL's Evaluation Policy⁴¹. OCFT is committed to using the most rigorous methods applicable for this qualitative performance evaluation and to learning from the evaluation results. The evaluation will be conducted by an independent third party and in an ethical manner and safeguard the dignity, rights, safety and privacy of participants. OCFT will make the evaluation report available and accessible on its website.

Project Context⁴²

Though informal and unregulated, the artisanal and small-scale gold mining (ASGM) sub-sector is economically significant both in terms of production quantity and employment levels. An estimated 10-15 million miners work in ASGM, including a high proportion of child

⁴¹For more information on DOL's Evaluation Policy, please visit <https://www.dol.gov/asp/evaluation/evaluationpolicy.htm>

⁴²Adapted from the CARING Gold Mining Project CMEP

laborers. Mining work is generally hazardous, but can be even more so for child laborers tasked with using heavy and dangerous tools, carrying heavy loads, or handling toxic materials.

In Ghana and the Philippines, which have particularly high incidence of children working in ASGM, three country-level problems and one global-level problem contribute to the high incidence of child labor in ASGM operations. First, laws, policies, and action plans on ASGM activities, including child labor, are outdated or not enforced because of a lack of human capacity among the enforcement agencies, a lack of budget support for enforcement, and the absence of mechanisms focused on ASGM enforcement. Second, ASGM communities often lack access to social protection and sustainable livelihoods, in part due to their typically remote locations. Third, there are no coordinated mechanisms for monitoring of child labor and working conditions along the ASGM supply chains because a framework for monitoring does not exist (as in Ghana) or because monitoring mechanisms are not used (as in the Philippines). Finally, globally, there is limited information sharing and networking with regard to ASGM practices to reduce child labor and improve working conditions.

Project Specific Information⁴³

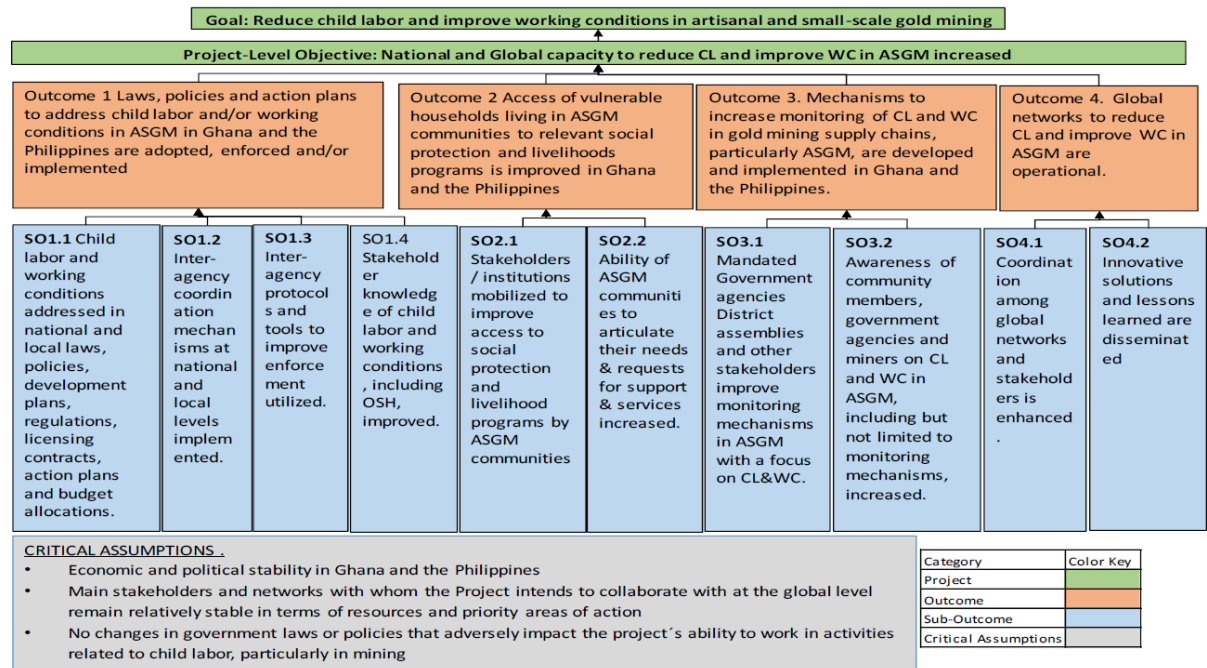
From December 2015 through October 2019, the United States Department of Labor (USDOL) funded the “Convening Stakeholders to Develop and Implement Strategies to Reduce Child Labor in Artisanal and Small-Scale Gold Mining” (or CARING Gold Mining) Project, which aimed to increase the global and national capacities to reduce child labor and improve working conditions in the ASGM sector. Implemented by International Labour Organization (ILO), program activities were intended to achieve the following in Ghana and the Philippines: (1) promote adoption and/or enforcement and implementation of laws, policies, and action plans to address child labor and working conditions in ASGM; (2) improve the access vulnerable households in ASGM communities have to relevant social protection and livelihoods programs; (3) develop and implement mechanisms to increase monitoring of child labor and working conditions in gold mining supply chains, especially ASGM. Additionally, the project sought to make operational various global networks to reduce child labor and improve working conditions in ASGM.

Specific project activities were tailored to the needs of each country. In Ghana, activities were focused in two communities in each of three ASGM districts selected for inclusion in the project. In the Philippines, activities were focused on the municipalities of Labo, Paracale in the province of Camarines Norte, and T’boli South Cotabato.

The project’s results framework is provided below:

⁴³ Adapted from the CARING Gold Mining Project CMEP

A. Results Framework



PURPOSE AND SCOPE OF EVALUATION

Evaluation Purpose

This final evaluation is jointly managed by USDOL and ILO. The main purposes of the final evaluation are to:

1. Determine whether the project's Theory of Change (ToC), as stated in the project Comprehensive Monitoring and Evaluation Plan (CMEP), was appropriately formulated and whether there are any external factors that affected project outcomes in a positive and/or challenging way;
2. Assess the relevance, effectiveness, efficiency of project interventions at the local, national, and global levels.
3. Document lessons learned, good or promising practices (e.g., strategies and models of intervention), and identify additional opportunities (entry points) as input for current or future initiatives to address child labor and working conditions in ASGM in pilot countries and/or other countries; and
4. Assess which outcomes or outputs can be deemed sustainable.

The evaluation should assess whether the project's interventions and activities had achieved the overall goals of the project, and the reasons why this has or has not happened, including an assessment of the factors driving the project results. The evaluation should also document lessons learned, potential good practices, and models of intervention that will serve to inform current or future similar projects in Ghana and the Philippines and similar environments elsewhere, as appropriate.

The scope of the final evaluation includes a review and assessment of all activities carried out under the USDOL Cooperative Agreement with the ILO. All activities that have been implemented from project launch through the time of evaluation fieldwork should be considered.

Intended Users

The evaluation will provide OCFT, the ILO, other project stakeholders, and stakeholders working to combat child labor and improve working conditions in ASGM more broadly, an assessment of the project's performance, its effects on project participants, and an understanding of the factors driving the project results. The evaluation results, conclusions and recommendations will serve to inform any project adjustments that may need to be made, and to inform stakeholders in the design and implementation of subsequent phases or future child labor elimination projects as appropriate. The evaluation report will be published on the USDOL website, so the report should be written as a standalone document, providing the necessary background information for readers who are unfamiliar with the details of the project.

EVALUATION QUESTIONS

Category	Evaluation Questions
<i>Relevance</i>	1. To what extent did the components (law and policies, access to social protection programs, supply chain tools, and networks) and approach (local, national, and global) meet the needs of the country and stakeholders?
<i>Project Design and Validity</i>	2. Have the achievements of the project been consistent with the Theory of Change? How did the four components and approach contribute to achieving the goal of reducing child labor and improving working conditions in ASGM? What factors positively or negatively impacted the theory of change? 3. Did the project implementers/implementing partners work according to their expected roles as envisaged in the design?
<i>Project Effectiveness</i>	4. How effective were the Project's interventions? These include: Child Protection Committees (Ghana); SHIELD program (Philippines); Compassionate Gold (Philippines); mine formalization/legalization (Ghana and the Philippines); legal and policy (Ghana and the Philippines); supply chain monitoring tools (Ghana and the Philippines) 5. How effective was the project's strategy to involve key stakeholders at the global, national, provincial/district, and local levels in efforts against child labor, with a focus on mining? Key Stakeholders included <i>government, miners, employers and workers' organizations, mining communities, BAN Toxics and the Ghana National Association of Small-Scale Miners, and other stakeholders. Was ILO's facilitation role effective? Did it create the required synergies among key stakeholders?</i> 6. To what extent did the project contribute to helping ASGM households, miners, and communities' access social protection and livelihood programs?
<i>Efficiency</i>	7. Were the project activities efficient in terms of financial and human resources in relation to its results and outputs? What factors, if any, affected efficiency?
<i>Effectiveness of Project Management</i>	8. How were the project's M&E tools (CMEP) and system used and adjusted for project implementation and management?
<i>Sustainability</i>	9. Which of the project's outputs/outcomes are most sustainable (durable) and transferable to government institutions, the private sector, employers and workers' organizations, civil society organizations, and communities to support efforts to reduce child labor in gold mining in Ghana and the Philippines?
<i>Lessons Learned and Best Practices</i>	10. What are the best promising practices and lessons learned that could benefit similar projects? (including the SHIELD program, mine formalization/legalization, Compassionate Gold, Child Protection Committees, information-sharing at the global level).

EVALUATION METHODOLOGY

The evaluation methodology will consist of the following activities and approaches:

Approach

The evaluation approach will be qualitative and participatory in nature, and use project documents including CMEP data to provide quantitative information. Qualitative information will be obtained through field visits, interviews and focus groups as appropriate. Opinions coming from stakeholders and project participants will improve and clarify the use of quantitative analysis. The participatory nature of the evaluation will contribute to the sense of ownership among stakeholders and project participants.

To the extent that it is available, quantitative data will be drawn from the CMEP and project reports and incorporated in the analysis. The evaluation approach will be independent in terms of the membership of the evaluation team. Project staff and implementing partners will generally only be present in meetings with stakeholders, communities, and beneficiaries to provide introductions. The following additional principles will be applied during the evaluation process:

1. Methods of data collection and stakeholder perspectives will be triangulated for as many as possible of the evaluation questions.
2. Efforts will be made to include parents' and children's voices and beneficiary participation generally, using child-sensitive approaches to interviewing children following the ILO-IPEC guidelines on research with children on the worst forms of child labor (<http://www.ilo.org/ipецinfo/product/viewProduct.do?productId=3026>) and UNICEF Principles for Ethical Reporting on Children (http://www.unicef.org/media/media_tools_guidelines.html).
3. Gender and cultural sensitivity will be integrated in the evaluation approach.
4. Consultations will incorporate a degree of flexibility to maintain a sense of ownership of the stakeholders and beneficiaries, allowing additional questions to be posed that are not included in the TOR, whilst ensuring that key information requirements are met.
5. As far as possible, a consistent approach will be followed in each project site, with adjustments made for the different actors involved, activities conducted, and the progress of implementation in each locality.

Evaluation Team

The evaluation team will consist of:

1. An international evaluator, Dan O'Brien, will serve as the team leader. He will lead data collection tool development, conduct field work in both Ghana and the Philippines, lead in-country stakeholders workshops and produce draft and final evaluation reports.
2. Two national evaluators, one in Ghana and the other in the Philippines, will support the team leader in data collection including key informant interviews and focus group discussions and analysis.

3. As appropriate an interpreter fluent in necessary languages will travel with the evaluators.

One member of the project staff may travel with the team to make introductions. This person is not involved in the evaluation process or interviews.

The team leader will be responsible for developing the evaluation methodology in consultation with QED, USDOL, ILO, and the project staff. He will also be responsible for assigning tasks of the national evaluators and the interpreter, as applicable. He will provide technical assistance and guidance to the national evaluators in conducting key informant interviews, focus group discussions, and other qualitative data collection tasks and well as their analysis.

The team leader with assistance from the assistant evaluators, will conduct key informant interviews and focus group discussions with project stakeholders including beneficiaries. The team leader will be responsible for leading the in-country stakeholders' workshops (one in the Philippines and the other in Ghana) where the preliminary results of the evaluation will be presented and discussed. The team leader with support and input from the national evaluators, will be responsible for analyzing data and using them to prepare the draft and final evaluation reports.

The national evaluators will be responsible for providing support to the team leader, including conducting key informant interviews and focus group discussions, conducting desk research, reviewing and commenting on draft evaluation reports, undertaking other evaluation tasks assigned by the team leader. The national evaluators will work closely with the lead evaluator throughout field work and will also support the analysis of the collected qualitative data and the preparation of the presentation for the stakeholder meeting.

The responsibility of the interpreter in each locality, if needed, is to ensure that the evaluation team is understood by the stakeholders, and that the information gathered is relayed accurately to the evaluators. The interpreter should be impartial and independent from the ILO in order to mitigate potential bias.

Data Collection Methodology

1. Document Review

- Pre-field visit preparation includes extensive review of relevant documents
- During fieldwork, documentation will be verified and additional documents may be collected
- Documents may include:
 - CMEP documents and data,
 - Baseline and endline survey reports or pre-situational analyses,
 - Project document and revisions,
 - Project budget and revisions,
 - Cooperative Agreement and project modifications,
 - Technical Progress and Status Reports,

- Project Results Frameworks and Monitoring Plans,
- Work plans,
- Correspondence related to Technical Progress Reports,
- Management Procedures and Guidelines,
- Research or other reports undertaken (KAP studies, etc.), and,
- Project files (including school records) as appropriate.

2. Question Matrix

Before beginning fieldwork, the evaluator will create a question matrix, which outlines the source of data from where the evaluator plans to collect information for each TOR question. This will help the evaluator make decisions as to how they are going to allocate their time in the field. It will also help the evaluator to ensure that they are exploring all possible avenues for data triangulation and to clearly note where their evaluation results are coming from. The Contractor will share the question matrix with USDOL.

3. Interviews with stakeholders

With the support of national evaluators, QED will consult with USDOL, the Project and ILO to determine the appropriate number of Key informant interviews and focus group discussions in each country. These interviews will be held with project implementation team members and key stakeholders identified through document review and consultation with USDOL and the ILO. Depending on the circumstances, these interviews will be one-on-one or group interviews. Technically, stakeholders are all those who have an interest in a project, such as implementers, partners, direct and indirect participants, community leaders, donors, and government officials. Thus, it is anticipated that key informant interviews will be conducted with:

- OCFT staff responsible for this evaluation and project prior to the commencement of the field work
- Implementers at all levels
- Headquarters, Country Directors, Project Manager, and Field Staff of ILO and Partner Organizations
- Representatives of relevant Employers and Workers organizations
- Government Ministry Officials and Local Government Officials who have been involved in or are knowledgeable about the project
- Community leaders, members, and volunteers
- Other project participants
- International NGOs and multilateral agencies working in the area
- Other child protection and/or education organizations, committees and experts in the area
- U.S. Embassy staff members
- Purposively selected household visits

If applicable, with the support of national evaluators the evaluator may decide to conduct focus group discussions instead of group interviews. The exact number of sessions will be

determined after consultations with USDOL and ILO. The evaluator may draw from trained government stakeholders, project supported local civil society organizations, businesses that received and implemented the Child Labor Guidance Tool or community members involved in ASGM (miners, parents or children). As focus groups are generally convened around a group of 6 to 10 generally homogenous stakeholders, it will be up to the discretion of the lead evaluator to determine the need for focus group discussions or group interviews, generally conducted with smaller groups.

4. Field Visits

The evaluation team will visit a selection of project sites in both Ghana and the Philippines. The final selection of field sites to be visited will be made by the team leader with input from the national evaluators. Every effort should be made to include some sites where the project experienced successes and others that encountered challenges, as well as a good cross section of sites across targeted CL sectors. During the visits, the evaluator will observe the activities and outputs developed by the project and conduct key informant interviews and focus group discussions if deemed appropriate. For purpose of training and calibration, the team leader and national evaluator may go to some project areas together to conduct interviews/site visits or focus group discussions. Depending on geographical conditions of the project areas, the evaluation team may go to the same project areas but conduct separate interviews/observations or focus group discussions. However, to maximize efficiency and broader coverage, they should not go to all the same areas together.

Ethical Considerations and Confidentiality

The evaluation mission will observe utmost confidentiality related to sensitive information and feedback elicited during the individual and group interviews. Prospective respondents will be informed of their right to decline participation in the evaluation without penalty. All respondents will be made aware at the outset that they are free to terminate the interview at any point, and to skip any questions that they do not wish to respond to, or to withdraw from the evaluation, without penalty. To mitigate bias during the data collection process and ensure a maximum freedom of expression of the implementing partners, stakeholders, communities, and project participants, implementing partner staff will generally not be present during interviews. However, implementing partner staff may accompany the evaluator to make introductions whenever necessary, to facilitate the evaluation process, make respondents feel comfortable, and to allow the evaluator to observe the interaction between the implementing partner staff and the interviewees. The evaluators will follow the ILO Code of Conduct for evaluation: https://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_649148.pdf

Stakeholder Meeting

At the end of each country field visit, a stakeholder meeting will be organized by the project and led by the evaluators to bring together a wide range of stakeholders, including the implementing partners and other interested parties to discuss the evaluation findings. The list of participants to be invited will be drafted prior to the evaluators' visit and confirmed by the evaluators in consultation with project staff during fieldwork. ILAB staff may

participate in the stakeholder meeting virtually.

The meeting will be used to present the major preliminary results and emerging issues, solicit recommendations, discuss project sustainability and obtain clarification or additional information from stakeholders, including those not interviewed earlier. The agenda of the meeting will be determined by the evaluators in consultation with project staff. Some specific questions for stakeholders may be prepared to guide the discussion and possibly a brief written feedback form.

The agenda is expected to include some of the following items:

1. Presentation by the evaluators of the preliminary main results
2. Feedback and questions from stakeholders on the results
3. Opportunity for implementing partners not met to present their views on progress and challenges in their locality
4. Discussion of recommendations to improve the implementation and ensure sustainability. Consideration will be given to the value of distributing a feedback form for participants to nominate their “action priorities” for the remainder of the project.

A debrief call will be held with the team leader and USDOL after the stakeholder workshop to provide USDOL with preliminary results and solicit feedback as needed.

Limitations

Fieldwork for the evaluation in each country will last two weeks, on average, and the evaluator will not have enough time to visit all project sites. As a result, the evaluator will not be able to take all sites into consideration when formulating their results. All efforts will be made to ensure that the evaluator is visiting a representative sample of sites, including some that have performed well and some that have experienced challenges.

This is not a formal impact assessment. Results for the evaluation will be based on information collected from background documents and in interviews with stakeholders, project staff, and project participants. The accuracy of the evaluation results will be determined by the integrity of information provided to the evaluator from these sources.

Furthermore, the ability of the evaluator to determine efficiency will be limited by the amount of financial data available. A cost-efficiency analysis is not included because it would require impact data which is not available.

Timetable

The tentative timetable is as follows. Actual dates may be adjusted as needs arise.

Task	Responsible Party	Date
Evaluation launch call	DOL/OCFT	05/08/2019
Background project documents sent to Contractor	DOL/OCFT	05/10/2019
TOR Template submitted to Contractor	DOL/OCFT	06/10/2019
DOL sends draft evaluation questions to ILO for review/or sends draft evaluation questions to QED/I4DI	DOL/OFCT	6/12/2019
Draft TOR sent to DOL/OCFT and ILO	QED/I4DI	6/12/2019
DOL and project staff provide feedback on draft TOR	QED/I4DI and ILO	6/14/2019
ILO provides feedback/revisions to suggested evaluation questions	ILO	6/15/2019
I4DI/QED provides feedback/revisions to suggested evaluation questions	QED/I4DI	6/15/2019
Conference call with DOL/ILO/QED& I4DI to discuss evaluation questions	DOL/ILO and QED/I4DI	6/19/2019
Contractor and ILO work to develop draft itinerary and stakeholder list	QED/I4DI and ILO	6/21/2019
Logistics call - Discuss logistics and field itinerary	DOL/OCFT, QED/I4DI, and ILO	7/10/2019
Contractor sends minutes from logistics call	QED/I4DI	7/12/2019
Submit question matrix to DOL/OCFT	QED/I4DI	7/16/2019
Finalize field itinerary and stakeholder list for workshop	DOL/OCFT, QED/I4DI, and ILO	7/15/2019
Cable clearance information submitted to DOL/OCFT	QED/I4DI	7/18/2019
Final TOR submitted to DOL/OCFT for approval	QED/I4DI	7/12/2019
Final approval of TOR by DOL/OCFT	DOL/OCFT	7/15/2019
Submit finalized TOR to ILO and ILO	QED/I4DI	7/15/2019
Submit fieldwork budget to DOL/OCFT	QED/I4DI	7/18/2019
Interview call with DOL/OCFT and ILO	QED/I4DI	Week of 7/22/2019
Fieldwork--Ghana	QED/I4DI	08/05/2019-08/16/2019
In-country stakeholder workshop -- Ghana	QED/I4DI	08/16/2019
Fieldwork—the Philippines	QED/I4DI	08/19/2019-08/30/2019
In-country stakeholder workshop -- Philippines	QED/I4DI	08/30/2019
Post-fieldwork debrief call	QED/I4DI	Week of 9/2/2019
Draft report submitted to DOL/OCFT and ILO for 48-hour review	QED/I4DI	9/30/2019
DOL/OCFT and ILO comments for 48-hour draft due to Contractor	DOL/OCFT and ILO	10/2/2019
Revised report (2-week review draft) submitted to DOL/OCFT and ILO	QED/I4DI	10/8/2019
DOL/OCFT and ILO/key stakeholder comments due to Contractor after full 2-week review	DOL/OCFT and ILO	10/22/2019

Final report submitted to DOL/OCFT and ILO	QED/I4DI	10/28/2019
Final approval of report by DOL/OCFT	DOL/OCFT	10/28/2019
Draft infographic document submitted to DOL/OCFT	QED/I4DI	11/6/2019
DOL/OCFT comments on draft infographic	DOL/OCFT	11/12/2019
Final infographic submitted to DOL/OCFT	QED	11/14/2019
Final approval of infographic by DOL/OCFT	DOL/OCFT	11/14/2019
Final edited and 508 compliant report submitted to COR	QED	11/14/2019

EXPECTED OUTPUTS AND DELIVERABLES

Thirty working days following the evaluator’s return from fieldwork, a first draft evaluation report will be submitted to the Contractor. The report should have the following structure and content:

- I. Table of Contents
- II. List of Acronyms
- III. Executive Summary (providing an overview of the evaluation, summary of main findings/lessons learned/good practices, and key recommendations not to exceed 5 pages)
- IV. Evaluation Objectives and Methodology
- V. Project Context and Description
- VI. Findings (answers to evaluation questions with supporting evidence)
- VII. Conclusions (interpretation of facts including criteria for judgements)
- VIII. Lessons Learned and Good Practices
- IX. Recommendations (critical for successfully meeting project objectives; judgments on what changes need to be made for future projects)
- X. Annexes - including list of documents reviewed; interviews/meetings/site visits; stakeholder workshop agenda and participants; TOR; etc.

The key recommendations must be action-oriented and implementable. The recommendations should be clearly linked to results and directed to a specific party to be implemented. It is preferable for the report to contain no more than 10 recommendations, but other suggestions may be incorporated in the report in other ways.

The total length of the report should be approximately *40 pages* for the main report, excluding the executive summary and annexes.

The first draft of the report will be circulated to OCFT, the ILO, and key stakeholders individually for their review. The evaluators will incorporate comments from stakeholders into the final reports as appropriate, and provide a response to OCFT and the ILO, in the form of a comment matrix, as to why any comments might not have been incorporated.

While the substantive content of the results, conclusions, and recommendations of the report

shall be determined by the evaluator, the report is subject to final approval by ILAB/OCFT in terms of whether or not the report meets the conditions of the TOR.

EVALUATION MANAGEMENT AND SUPPORT

The evaluation is being managed jointly by the ILO and USDOL. USDOL and ILO each appointed an evaluation manager, with those two managers constituting the joint evaluation management team. The joint management of the evaluation entails: ToR is reviewed and finalized jointly; consensus on evaluation team's constitution, implementation plan of the evaluation and timelines; joint review of the draft and final reports.

QED/I4DI and its evaluators are responsible for conducting the evaluation according to the terms of reference (TOR). They will:

- Review project background documents
- Review the evaluation questions and refine the questions, as necessary
- Develop and implement an evaluation methodology (i.e., conduct interviews, review documents) to answer the evaluation questions, including a detailed discussion of constraints generated by the retrospective nature of this evaluation methodology and data collection and how those constraints could be avoided in future projects
- Conduct planning meetings/calls, as necessary, with USDOL and ILO.
- Cover international and national travel (airline tickets), hotels, meals, taxis to and from airports, and other incidental travel expenses.
- Decide final composition of itinerary, field visits, and interviews to ensure objectivity of the evaluation.
- Present verbally preliminary findings to project field staff and other stakeholders after fieldwork in each country and to USDOL and ILO via telephone calls once all fieldwork is complete.
- Prepare initial drafts (48-hour and 2-week reviews) of the evaluation report and share with USDOL and ILO.
- Prepare and submit final report.

USDOL is responsible for:

- Providing project background documents to the evaluator.
- Providing evaluation questions and other input to the TOR.
- Approving the TOR.
- Obtaining country clearance.
- Briefing ILO on evaluation to ensure coordination and preparation for evaluator.
- Reviewing of and providing comments on the draft evaluation reports.
- Approving the final draft of the evaluation report.
- Participating in the post-fieldwork debriefing call.

ILO is responsible for:

- Hiring of two national evaluators (one in the Philippines and the other in Ghana) to support the team leader
- Reviewing and providing input to the TOR.
- Providing project background materials to the evaluator.
- Preparing draft agendas for each evaluation target country including a list of recommended interviewees.
- Scheduling interviews during fieldwork and coordinating all logistical arrangements including providing introductions to key informants to be interviewed.
- Scheduling telephone interviews with key ILO representatives after fieldwork is complete.
- Reviewing and providing comments on the draft evaluation reports.
- Participating in the post-fieldwork stakeholder debrief to review and discuss preliminary findings.
- Providing local ground transportation to and from meetings and interviews including visits to project sites requiring ground transportation.
- Organizing, participating in, and paying for the stakeholder meetings.

Annex B: Master List of Interview Questions

1. How well do you believe the project interventions met the needs and priorities of the country? Do you believe any of the interventions did not meet the needs and priorities of the country?
2. Were the project's components implemented as designed in the theory of change? Did they have the intended impact?
3. What factors influenced, positively or negatively, the theory of change?
4. Did the project implementing partners perform roles and responsibilities as envisioned? Please explain.
5. How effective were the project's interventions? Please comment on the following:
 - Child Protection Committee (Ghana)
 - SHIELD (Philippines)
 - Compassionate Gold (Philippines)
 - Mine formalization
 - Policies, laws
 - Supply chain monitoring tools
6. How effective was the project at facilitating the involvement its key stakeholders at all levels? Were any stakeholders not sufficiently involved? If not, why?
7. To what extent did the project help miners, households, and communities' access social protection and livelihood services? Please explain the successes and challenges in accessing these services.
8. Do you believe the project was implemented in an efficient manner? What could the project have done to be more efficient?
9. Was the CMEP and its tools useful? Were they adjusted at some point and if so how and why? Was the adjustment useful?
10. Which of the project's outputs and outcomes do you think have the best chance of continuing once the project ends? Please explain why.
11. What are the most useful lessons learned that could benefit other similar projects?
12. What are project's good practices that could benefit other similar projects?

Annex C: Evaluation Team Biographical Summaries

Lead Evaluator

Dan O'Brien served as the lead evaluator. Dan is a private sector and labor expert with over 40 years of experience in the field of international development. While at CARE International, Dan served as technical advisor where he developed CARE's approach to project design and M&E. He led both internal and external evaluations of CARE's programs and developed M&E toolkits and training materials. Dan also served as the country director in Indonesia and as the regional director for Asia where he was responsible for supervising the region's country directors and programs as well as a cadre of technical consultants that supported CARE programs in the region including M&E specialists.

Dan is also a highly experienced evaluator and evaluation manager. He either served as the lead evaluator or evaluation manager for 45 ILAB and ILO labor project evaluations in Asia, Africa, Middle East, Latin American, and the Caribbean. Dan evaluated 20 OTLA and OCFT funded projects in Bangladesh, Indonesia, Malaysia, Philippines, Lesotho, Uganda, Jordan, Colombia, Costa Rica, Dominican Republic, El Salvador, Haiti, Honduras, Nicaragua, and Peru. In addition, Dan evaluated three ILO labor projects implemented in Ethiopia, Kenya, Liberia, Senegal, Sierra Leon, Bolivia, Guyana, Haiti, Dominican Republic, Honduras, Nicaragua, and Paraguay. Dan also managed ILAB project evaluations in Afghanistan, Cambodia, Indonesia, Vietnam, Burkina Faso, Ethiopia, Liberia, Tanzania, Morocco, Jordan, Turkey, Georgia, Bolivia, Colombia, Mexico, and Peru.

Assistant Evaluator, Ghana

Daniel Ofoe Chachu served as the assistant evaluator in Ghana. Daniel has 15 years of monitoring and evaluation experience on development projects in West Africa, including providing leadership and support for the design and implementation of monitoring and evaluation strategies for ILO-IPEC projects in West Africa. Daniel led the design and development of the M&E strategy for the Cocoa Communities Project in Ghana and Côte d'Ivoire. He has contributed to several technical reports on child labor/protection and youth employment in Ghana, including facilitating and contributing to a joint research project on child labor and youth employment in Ghana, involving the ILO, World Bank and UNICEF. Mr. Chachu has strong experience with various M&E tools and methodologies including managing surveys of different size scales.

His 7 years of work experience as a Policy Analyst with the Integrated Social Development Centre (ISODEC) and the Institute for Fiscal Policy honed his expertise in monitoring and evaluation of government policies and programs. Daniel served as the point person on fiscal incidence analysis of government economic policies (especially on vulnerable groups such as women and children). He also undertook several field exercises on public policy and expenditure monitoring. At ISODEC, Daniel contributed to developing tools and mechanisms to promote a rights-based and citizenship development framework and led several trainings on public expenditure monitoring.

Assistant Evaluator, Philippines

Rhoda Tiongson served as the assistant evaluator in the Philippines. Rhoda has worked in the design, implementation, monitoring and evaluation of development policies, programs and projects for over two decades. She was program manager in USAID-supported “Health Policy Development Program” where she co-managed an operations research that helped strengthen the policy and financing environment for family health in the Philippines. Prior to this, she worked as senior economic development specialist at the National Economic and Development Authority, where she participated in medium-term Philippine development planning, monitoring and evaluation, and appraised the socioeconomic viability of project proposals for funding.

She co-authored the National Objectives for Health 2017-2022, which contains the Philippine medium-term plan and targets on health. She also co-wrote monitoring reports to Congress on the implementation of the Responsible Parenthood and Reproductive Health Care Act in the Philippines. Rhoda worked with UNDP in assessing the integration of Sustainable Development Goals in Philippine local development planning and was engaged as National Assessor on public financial management. She was also part of the Asian Institute of Management team that assessed the competitiveness of the Philippine meetings and conventions industry, leading to the development of the country’s first roadmap for the industry. She earned her B.S. degree in Commerce, major in Economics from the University of Santo Tomas, and her master’s degree in Public Administration, major in Public Policy, from the University of the Philippines.

Annex D: List of Documents Reviewed

- ILAB Funding Opportunity Announcement
- CARING Gold Mine Project Award
- Cooperative Agreement
- Project Revisions (#1 through #6)
- Project Document
- Comprehensive Monitoring and Evaluation Plan (CMEP)/Annexes and Tools
- 2019 Management Procedures Guidelines
- Technical Progress Reports/Annexes (April 2016 through April 2019)
- Budgets: Global, Ghana, Philippines
- Project midterm review report
- USDOL Standard Indicator Guidance
- KAP survey report for Ghana and the Philippines
- Pre-situational reports for Ghana, Philippines, and global
- Code of Risk-mitigation for ASM engaging in Formal Trade – CRAFT
- Compassionate Gold Business Model and Market Study, Draft
- Global Component Work Plan
- Medium-Term Development Plan, Aowin
- Medium-Term Development Plan, Adansi North
- Ghana Child Labour Monitoring System
- CARING Gold Mine Project Midterm Performance Review
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“the Guidance”)
- OECD Practical Actions for Companies to Identify and Address the Worst Forms of Child Labour in Mineral Supply Chains

Annex E: List of Persons Interviewed

Name	Organization	Position	Sex	Email	Telephone
Ghana					
Giovanni Soledad	ILO	Project Director	M	soledad@ilo.org	0558303301
Kwame Mensah	ILO	Child Labor Officer	M	mensah@ilo.org	
Louisa Asigri-Telly	ILO	M&E Officer	F	asigri-telly@ilo.org	0264583005
Kwaku Treveh	ILO	Mining Officer	M	treveh@ilo.org	0244243968
Louis Acheampong	SSF	Executive Director	M	alouis72@yahoo.com	0244605165
Robert Abana	SSF	Project Officer	M	foundsafghana@yahoo.com	0242816998
Victoria Dzidzieno	SSF	Finance and Admin	F	amadzidzieno@gmail.com	0207166711
Isaac Nsiah	SSF	Project Officer	M	isaacnsiah71@yahoo.com	0243814300
Emmanuel Yirenskyi	GNASSM	Director of Operations	M	eyantwi@gmail.com	0244522655
Benjamin Korblah	GNASSM	Consultant	M	bentreve@yahoo.com	0244760908
Paul A. Kukwaw	NECPAD	Executive Director	M	necpad@yahoo.com	0208276136
Amaamatu Alhassan	Wai Adu-Asare Primary School,	Headmistress	M	N/A	0243589459
Robert Owusu	Wai Adu-Asare Primary School,	Teacher/SCREAM Club Patron	F	N/A	0245039403
Doreen Bamful	NHIS_Adansi North	Public Relations Officer	F	amakwa09@yahoo.com	0244873733
Samuel J. Laar	District Ed. Office, Adansi North	Head, Finance	M	samuellaar22@gmail.com	0249437366
Julius N. Saka-Hesse	District Ed. Office, Adansi North	Guidance and Counselling	M	mydeama368@gmail.com	0243843161
Flavia Boadi Sekyere	Adomanu	Resident	F	N/A	0248775217
Mary Ohenewa Boadi	Abedwum	Resident	F	N/A	0544969749
Isaac Asare	Abedwum	Student (Wai Adu Asare) P6	M	N/A	0550856751
Afia Safowaa	Abedwum	Mother of Isaac Asare	F	N/A	0559527456
Mary Yeboah	Abedwum	Residents	F	N/A	0248655077
Joyce Owusu	Abedwum	Residents	F	N/A	0547378676
Nicholas Frempong	Abedwum	Student at Adumenu JHS	M	N/A	0544174965
Stella Owusu	Abedwum	Student at Adumenu JHS 2	F	N/A	N/A
Leticia Honzey	Abedwum	Student at Wai Adu Asare JHS2	F	N/A	0248588415
Clemence Adzormahe	MC	District Mining Officer	M	cadzormahe@yahoo.com	0243114948
Vitalis Kanewala	MELR/Labour Department	District Labour Officer	M	N/A	0209012812
Daniel Adinyira	Aowin Municipal Education Office	Municipal Training Officer	M	lexadano@hotmail.com	0248911133
Moses Ngoah	Sewum DA JHS	Student (JHS graduate)	M	N/A	0554170235
Godfred Ackah	Sewum DA Primary	Student (Class 2)	M	N/A	N/A
John Atta	Mocheokrom Anglican JHS	Student (JHS 3)	M	N/A	N/A
Hannah Abena Tetteh	Mocheokrom Anglican JHS	Student (JHS 3)	F	N/A	N/A
Eric Panford Peters	GEA	Manager, Western Central Area	M	eppeters@ghanaemployers.com	0242555524
Dr. Charles Kessey	OHLGS	Director, Statistics	M	charles.kessey@lgs.gov.gh	+233206938889
Frank Kwasi Asante	OHLGS	Deputy Director	M	Asante-fk@hotmail.com	0277406979
Elizabeth Akambonbire	MELR/CLU	Head- CLU/ Asst. Officer	F	bettyakans1@yahoo.com	0244482394
Anthony Awotwi	MELR	Asst. Chief Labour	M	a_awotwe@yahoo.com	0244818278
Issah Moshin	MELR	Senior Labour Officer	M	ninsongh@yahoo.co.uk	0244290403
Stephen Agbo	MC	Community Relations	M	korshiaagbo@gmail.com	0244748765
Nelson Ahedor	MC	Asst. Manager (ASM)	M	nellyyahey@yahoo.com	0244438690
Paul Kukuaw	NCPD	Executive Director	M	necpad@yahoo.com	0208276136
Richard Fosu	NBSSI-BAC	Head of BAC, Amenfi	M	richardfosu18@yahoo.com	0243041038
Habiba Sumani	NBSSI-BAC	Director, NBSSI-BAC	F	N/A	0548311118
Veronica Addai	Adomanu	Queen Mother-Rep	F	N/A	0240913024
Yaw Minta	Adomanu	Elder	M	N/A	N/A
Joseph Asante	Adomanu	Chief's Secretary	M	N/A	0265419789
Nana Osei Bobie	Adomanu	Adontenhene/Sub-chief	M	N/A	0243747570
Nana Bobie Ansah	Adomanu	Gyasewa/ Sub-chief	M	N/A	0243263301
Nana A. Mintah	Adumenu	Elder	M	N/A	0266106434
Opanyin Osei Kojo	Abedwum	Elder	M	N/A	0245745388
Opanyin Kojo Asare	Achiase	Elder	M	N/A	0255366097
Nana Nkyi	Adomanu	Chief Linguist	M	N/A	0553750025

Name	Organization	Position	Sex	Email	Telephone
Nana Sekyere Boadi	Adomanu	Elder	M	N/A	0268310538
Opanyin Anokye	Adomanu	Elder	M	N/A	N/A
Nana Kwakye	Adomanu	Elder	M	N/A	N/A
Eric Opoku	Obedwum	Opinion leader	M	ekopoku@gmail.com	0243352626
Agyeman Kofi	Adomanu	Elder	M	N/A	N/A
Forson TawiahMordey	Adumenu	Translator	M	Forsonmordey0@gmail.com	0208551857
Okyeame Kofi	Adumenu	Elder/Caretaker	M	N/A	N/A
Agyeman Boadi	Adumenu	Linguist (Assistant)	M	N/A	N/A
Kusi Kwaku Eric	Adansi North	DCE	M	Erikusjnr03@gmail.com	0275922997
Oduro Donkor	Adansi North	CDO	M	nkuahmidas2@gmail.com	0542567073
Midas Nkuah	Adansi North	Head, SW and CD	M	nkuahmidas2@gmail.com	0246452093
E. Amoakohene	Adansi North	Planning Officer	M	emma.amoakohene@gmail.com	0208080102
Emmanuel Owusu	CCPC	Teachers' Rep	M	emmaowusu84@gmail.com	0241336834
Isaac Opoku	CCPC	Opinion Leader	M	iopoku7056@gmail.com	0249258782
Samuel Agyapong	CCPC	Mining Site Rep	M	N/A	0265952567
Yaw Mintah	CCPC	S.M.C Rep	M	N/A	0265568197
Collins Boakye	CCPC	Youth Rep	M	N/A	0547827404
Kwame Bobie Ansah	CCPC	Community Watch Dog	M	N/A	0271443304
Fordjour Joseph	CCPC	Rep of Chiefs	M	N/A	0279860854
Akwasi Boadu	CCPC	Religious Rep	M	N/A	0262455793
Kwame Wiredu	CCPC	Youth Organizer	M	N/A	0263119950
J. E. Essilfie	CCPC	Children's Rep	M	N/A	0249947122
James Mfum	CCPC	Chief's Rep	M	N/A	0265419789
Francis Agyeman	CCPC	Teacher's Rep	M	N/A	0262243361
Robert Fosu	CCPC	Club Patron	M	fosurobert@gmail.com	0246698391
Veronica Addai	CCPC	Queen mother rep	F	N/A	0240913024
Cecilia Compson	CCPC	Women Organizer	F	N/A	0279544940
Kwaku Ampong	CCPC	Religious leader	M	N/A	0243956715
Prince Owusu	CCPC	Unit Committee Rep	M	N/A	0249723861
Sasu Appah	CCPC	Mining Rep	M	N/A	0244921156
Amoah Bernard	CCPC	Student Rep	M	N/A	0546588270
Afia Premang	CCPC	Women's Rep	F	N/A	0245022782
Charles Frempong	Adumenu	Translator	M	N/A	0242689835
Nana Boadi Sekyere	Adumenu	Executive Member, Mining Site	M	N/A	0268310538
Joseph Owusu Sekyere	Adumenu	Executive Member, Mining Site	M	N/A	0267633115
Yaw Aoyam	Adumenu	Miner	M	N/A	0553140041
Amoabeng Francis	Abedwum	Miner	M	N/A	0245229294
Michael Adusei	Abedwum	Miner	M	N/A	0556798215
Kwaku Ampong	Abedwum	Miner	M	N/A	0243956715
Prince Owusu	Abedwum	Miner	M	N/A	0249723861
Victor Aidoo	Abedwum	Miner	M	N/A	0557861652
Adu Gyasi	Abedwum	Miner	M	N/A	0541001140
Osei Francis	Abedwum	Miner	M	N/A	0543509588
Stephen Adu G.	Abedwum	Miner	M	N/A	0246523994
Richard Oduro	Abedwum	Miner	M	N/A	026455648X
Prince Abeka	Abedwum	Miner	M	N/A	0243882544
A.K. Anokye	Abedwum	Miner	M	N/A	0264144191
Osei Kwame	Abedwum	Miner	M	N/A	0544265790
Doku Teye	Abedwum	Miner	M	N/A	0553424479
Charles Kyei Frimpong	Adansi North	Interpreter	M	N/A	0242689835
Yaw Appiah	Abedwum	Miner	M	N/A	0247227447
Mensah Isaac	Abedwum	Miner	M	N/A	0269174968
Obed Asante	Abedwum	Miner	M	N/A	0264162015
Boateng Isaac	Adomanu	Miner	M	N/A	0551970067
Solomon Adjei	Adomanu	Miner	M	N/A	0244545100
Asare Bismark	Adomanu	Miner	M	N/A	N/A
Kwabena Boateng	Abedwum	Miner	M	N/A	0540705911
Joseph Freedom Esuh	MELR/Labour Department	Municipal Labour Office	M	ezuhjosephfreedom@yahoo.com	0244416931
Robert Ankumah	MELR/Labour Department	SNR Labour Dept.	M	Obibaorlando04@gmail.com	0244139066
Nana Angyemia	Sewum	Traditional/Opinion leader	M	N/A	0546821387

Name	Organization	Position	Sex	Email	Telephone
Nana Korsah	Sewum	Traditional/Opinion leader	M	N/A	0546673920
Ahwi Gyasi	Sewum	Traditional/Opinion leader	M	N/A	0544648572
Mr..Ebba Kwasi	Sewum	Traditional/Opinion leader	M	N/A	0.542506651
Mr. Samuel Abban	Sewum	Traditional/Opinion leader	M	N/A	0554213199
Nana Appiah	Sewum	Traditional/Opinion leader	M	N/A	N/A
Nana Makoma	Sewum	Traditional/Opinion leader	M	N/A	0554170352
Nana Atimiah	Sewum	Traditional/Opinion leader	M	N/A	0554170109
Okyeame Mingo	Sewum	Traditional/Opinion leader	M	N/A	0556789714
Okyeame Kofi	Sewum	Traditional/Opinion leader	M	N/A	N/A
Okyeame Ebba	Sewum	Traditional/Opinion leader	M	N/A	0554202908
Nana Odum	Sewum	Traditional/Opinion leader	M	N/A	0552978865
Boadi Kwasi	Sewum	Traditional/Opinion leader	M	N/A	N/A
Kofi Bosom	Sewum	Traditional/Opinion leader	M	N/A	0545923262
Kwame Effuem	Sewum	Traditional/Opinion leader	M	N/A	N/A
Eduku Baa	Sewum	Traditional/Opinion leader	M	N/A	N/A
Kwasi Thomas	Sewum	Traditional/Opinion leader	M	N/A	0571096162
Justice Annan	Sewum	Traditional/Opinion leader	M	N/A	N/A
Mmranthene Ehyia	Sewum	Traditional/Opinion leader	M	N/A	N/A
Agya Bullu	Sewum	Traditional/Opinion leader	M	N/A	N/A
Emmanuel Donkor	G.E.S	Translator	M	N/A	0246540129
Isaac Oppong	Aowin Municipal Assembly	Social Welfare Officer	M	N/A	0541773052
Samuel Adu-Gyamfi	Aowin Municipal Assembly	Municipal Chief Executive	M	kofiadusammy@gmail.com	0243217124
Alhassan Iddrisu	Aowin Municipal Assembly	A/D 1	M	lddrisualhassan23@gmail.com	0240464006
Oduro-Boampong W.	Aowin Municipal Assembly	Municipal Planning Officer	M	jruie2533@gmail.com	0244830698
Wise Zah	Aowin Municipal Assembly	MIO	M	wizaza2k@gmail.com	0243634256
John Oteng	Mochechrom Mining Site	Site Manager	M	N/A	0544034722
Kwame Kyei	Mochechrom Mining Site	Miner	M	N/A	0242756484
Solomon Yensu	Mochechrom Mining Site	Miner	M	N/A	-
Tandoh Obed	Mochechrom Mining Site	Miner	M	N/A	0554214486
Enock Brew	Mochechrom Mining Site	Miner	M	N/A	0542497497
Fataw Morro	Mochechrom Mining Site	Miner	M	N/A	-
Owusu Joseph	Mochechrom Mining Site	Miner	M	N/A	0202660239
Kwabena Tiabo	Mochechrom Mining Site	Miner	M	N/A	0552267319
Alu Vincent	Mochechrom Mining Site	Miner	M	N/A	-
Kofi David	Mochechrom Mining Site	Miner	M	N/A	0579184629
Dramani Brugila	Mochechrom Mining Site	Miner	M	N/A	0275942111
Moses Ebba	Mochechrom Mining Site	Miner	M	N/A	0543756949
Samuel Donkor	Mochechrom Mining Site	Miner	M	N/A	0544599732
Kojo Agyemang	Mochechrom Mining Site	Miner	M	N/A	0242445622
Adzikah Moses	Mochechrom Mining Site	Miner	M	N/A	0547708271
Mohammed Musah	Mochechrom Mining Site	Miner	M	N/A	0540972355
Iddrisi Omaro	Mochechrom Mining Site	Miner	M	N/A	0245191638
Fr. Anthony Yeboah	CCPC	Religious Leader	M	N/A	0246924049
Nicholas Baidoo	CCPC	Youth Leader	M	N/A	0544579236
Peter A. Ndaa	CCPC	PTA/SMC Chair	M	N/A	0544574358
Samuel Assiam	CCPC	Traditional Leader	M	N/A	0544568400
Diana Assiam	CCPC	Women Association	F	N/A	0544568917
Agnes Mensah	CCPC	Rep., Queen Mother	F	N/A	0551052616
Martey Ahwah Gabriel	CCPC	Neighborhood Watch	M	N/A	0541095588
Gertrude Andoh	CCPC	Member	F	N/A	0541565330
Zottor Frederick	CCPC	Headmaster, Sewum DA JHS	M	fdz77@yahoo.com	0540513871
Richard Mensah	CCPC	CCPC coordinator	M	mesahrichard2@gmail.com	0551497778
D. Lartey Aduamah	CCPC	Headmaster, Mochechrom	M	dalartey954@gmail.com	0249168660
Acquaye Emmanuel	CCPC	Organizer	M	N/A	0554170809
Ebenezer Owusu	CCPC	Member	M	N/A	0554203211
Philippines					
Arleen Grace Taguba	ILO	National Project Coordinator	F	taguba@ilo.org	+639178041350
Irene de Leon	ILO	M&E Officer	F	deleon@ilo.org	+639088726008
Ednalyn Gulane	ILO	Administrative Assistant	F	gulane@ilo.org	+639175747440
Ma. Concepcion Sardana	ILO	Senior Programme Officer	F	sardana@ilo.org	+639171169917
Reynaldo San Juan, Jr.	Ban Toxics - Manila	Deputy Executive Director	M	reysan1@bantoxics.org	+639177100843
Arlene Honrade	Ban Toxics - Manila	Mining Officer	F	arleen@bantoxics.org	+639560790867

Name	Organization	Position	Sex	Email	Telephone
Ma. Rochelle Anne Orilla	Ban Toxics - Manila	M&E Officer	F	ma.roarilla@bantoxics.org	+639559177775
Dawn Jeffanie Po Quimque	Ban Toxics - Manila	Communications Officer	F	dawn@bantoxics.org	+639173584589
Catalino Rivera	Ban Toxics - Manila	Consultant	M	cpr2ph@yahoo.com	+639178565578
Jam Lorenzo	Ban Toxics - Manila	Research Associate	M	jlorenzo@bantoxics.org	+639175614523
Elias Salazar	Ban Toxics - South Cotabato	Project Manager	M	esalazar@bantoxics.org	+639956244408
Eunice Faith Zipagan	Ban Toxics – Camarines Norte	Field Coordinator	F	ezipagan@bantoxics.org	+639985744653
Arlene Galvez	Ban Toxics – Camarines Norte	Consultant on SHIELD	F	arlene@bantoxics.org	+639771483358
Evelyn Cubelo	Independent	Former Mining Officer	F	N/A	+639674196573
Sarah Marie Aviado	Councilor, Jose Panganiban, Camarines Norte	Former Mining Officer	F	N/A	N/A
Nonita Caguioa	DENR	Assistant Secretary on Mining	F	N/A	N/A
Joven Battung	DENR-MGB	Engineer III	M	N/A	N/A
Nelia Granadillos	DOLE-OSHC	Chief, Environment Control Division	F	ney.granadillos@yahoo.com	+639664987271
Charlene Parafina	DOLE-OSHC	Senior Industrial Hygienist	F	csparafina@yahoo.com	+639178421267
Rebecca Ballesteros	DSWD	Social Welfare Officer III	F	rballesteros@dswd.gov.ph	+639177160618
Karina Perida-Trayvilla	DOLE	Director IV	F	directorkaren@bwsc.dole.gov.ph	+6325275858
Maribeth Casin	DOLE-BWSC	Chief Labor and Employment Officer	F	mecasin@yahoo.com	+6325280119
Herman Mendoza	UP-DOST	Professor	M	ludge.mendoza@yahoo.com	+639209031273
Anne Bernadette Mandap	CBMS Network Office	Research and Administration Officer	F	N/A	+6325262067
Siegfred Flaviano	PEMO-South Cotabato	Provincial Environment Management Office Head	M	cgfred8@gmail.com	+639985740705
Nencita Acain	PEMO-South Cotabato	Chief, MGB	F	nency_acain509@yahoo.com.ph	+639199981239
Roger Tamayo	MGB XII	Engineer IV	M	rogertamayo@yahoo.com	+639338647083
Louie Esparagoza	DOLE XII – South Cotabato	Senior Labor and Employment Officer	F	engrlouie86@gmail.com	+639338199133
Jenny Ilomen	DOLE XII-South Cotabato Field Office	Admin. Asst. VI	F	dole12.southcot@gmail.com	+639123678178
Marlene Zaragoza	DOLE XII- South Cotabato Field Office	Admin. Asst. III	F	dole12.southcot@gmail.com	+639338119882
Mary Jane Rolda	DOLE, Camarines Norte Field Office	Provincial Head	F	rolda.jane@yahoo.com	+639399385810
Severino Francisco, Jr.	Labo Municipal Government, Camarines Norte	Municipal Administrator	M	N/A	+639999942115
Evaristo GL Pandi	Labo Municipal Government	Municipal Planning	M	ivan_mpdca@yahoo.com	+63545852340
Lovely Galicia	Labo, Camarines Norte	SHIELD Focal Person	F	lgalicia0601@gmail.com	+639483613424
Jeyson Miralles	Paracale, Camarines Norte	SHIELD Focal Person	M	mirallesjeyson@yahoo.com	+639384087903
Rodel Hilado	T'boli, South Cotabato	Senior Tourism Officer	M	rodz08dancer@yahoo.com	+639554684715
Swain de Groot	T'boli, South Cotabato	Former Councilor; Miner	F	swaindegroot@gmail.com	+639157380742
Joash Ray Israel	Sangguniang Kabataan of T'boli	President	M	admiraljoash@gmail.com	+639985650015
Edmund Ugal	Barangay Kematu, South Cotabato	MCSSMAI Board of Trustees	M	N/A	+639359314182
Gil Eran	Barangay Gumaus, Paracale, Camarines Norte	Punong Barangay	M	N/A	N/A
Fredelito Belleza	Barangay Malaya, Labo, Camarines Norte	Punong Barangay	M	N/A	N/A
Joel Madlangbayan	Barangay Malaya, Labo, Camarines Norte	SHIELD Focal Person	M	madlangbayanjoelP@gmail.com	N/A
Noel Lantin	MSSMA	President	M	N/A	N/A
Hermingildo Tonga	MSSMA	Vice-President	M	N/A	+639386365307
Rodante Videa	MSSMA	Board of Directors	M	N/A	+639100177009
Doroteo Potinco	MSSMA	Board of Directors	M	N/A	N/A
Fernado Dilluya	MSSMA	Board of Directors	M	N/A	N/A
Conrado Cielo	MSSMA	Member	M	N/A	N/A
Rodrigo Belleza	MSSMA; MFAC	Member	M	N/A	+639452762126
Maricel Opita	MSSMA	Member	F	N/A	+639354681072
Mario de Jesus	MSSMA	Member	M	N/A	N/A
Mary Ann Belleza	MSSMA	Member	F	N/A	N/A
Ludgere Lantin	MSSMA	Member	F	N/A	N/A

Name	Organization	Position	Sex	Email	Telephone
Jaquilyn Loyosa	MSSMA	Member	F	N/A	N/A
Wilsa Diaz	MSSMA	Member	F	N/A	N/A
Shirley Ramos	MSSMA	Member	F	N/A	N/A
Ceilo Neria	MSSMA	Member	F	N/A	N/A
Abner Magtangob	GSSMA	President	M	N/A	+639480180448
Nep Valenzuela	GSSMA	Vice President	M	N/A	N/A
Eduardo Nano	GSSMA	Board of Directors	M	N/A	+639300794100
Ma. Nympha Bang	GUSMA	Officer	F	N/A	N/A
Ida Data	GUSMA	Officer	F	N/A	N/A
Gaudencio Villaspin	GUSMA	Member	M	N/A	N/A
Lea Data	GUSMA	PIO	F	N/A	N/A
Conchita Riel	GUSMA	Member	F	N/A	N/A
Edwin Data	GUSMA	Member	M	N/A	N/A
Narciso Bobier	GUSMA	Member	M	N/A	N/A
Romeo Sucilan	GUSMA	Member	M	N/A	N/A
Emily Lopez	GUSMA	Member	F	N/A	+639301614474
Remedio Velarde	GUSMA	Member	F	N/A	N/A
Virginia Quezon	GUSMA	Member	M	N/A	N/A
Elmer Dames	GUSMA	Member	F	N/A	N/A
Jolieth Lacap	MCSSMAI	President	F	N/A	+639973129635
Grace Maguan	MCSSMAI	Land owner	F	N/A	+639973484053
Josephine Balonga	Small Scale Miners' Federation	President	F	N/	+639265030320
Jenita Neminio	MCSSMAI	Member	F	N/A	+639168735451
Rosita Mindal	MCSSMAI	Member	F	N/A	+639482324598
Marivel Ofang	MCSSMAI	Member	M	N/A	+639354348223
Berting Maguan	MCSSMAI	Member	M	N/A	+639058682715
AJ Maguan	MCSSMAI	Member	M	N/A	+639068911610
Paulita Maguan	MCSSMAI	Member	F	N/A	+639069670290
Vicky Wanan	MCSSMAI	Member	F	N/A	+639066152968
Chalay, Retitian	MCSSMAI	Member	F	CHalayr@gmail.com	+639076679878
Joy Lanado	MCSSMAI	Member	F	N/A	+639550643684
Rennan Laison	MCSSMAI	Member	M	N/A	+639474432725
Gil Indino	Philippine National Coalition on ASGM-Mindanao	Vice-President	M	NA	+639168882205
Jose Anayo, Jr.	Philippine National Coalition on ASGM	Chairman of the Board of Trustees	M	NA	+639399190598
Christian Maristela	Malaya, Labo, CN	Former CL	M	N/A	N/A
Jake Villacruz	Malaya, Labo, CN	Former CL	M	N/A	+639060369711
John Bansaga	Malaya, Labo, CN	Former CL	M	N/A	N/A
Reven Valenzuela	Malaya, Labo, CN	Former CL	M	N/A	+639482786562
Ana Rose Lemares	Malaya, Labo, CN	Former CL	F	N/A	N/A
Alaiza Joyce Pura	Malaya, Labo, CN	Former CL	F	N/A	N/A
Iccy Castro	Malaya, Labo, CN	Former CL	F	N/A	N/A
Jenny Tabagan	Malaya, Labo, CN	Former CL	F	N/A	N/A
Johnny Tabagan	Malaya, Labo, CN	Former CL	M	N/A	N/A
Mark Zamora	Malaya, Labo, CN	Former CL	M	N/A	N/A
Ronalyn Bronzal	Malaya, Labo, CN	Former CL	F	N/A	N/A
Angela Capitana	Malaya, Labo, CN	Former CL	F	N/A	N/A
Zenaida Cemantes	Malaya, Labo, CN	Parent of former CL	F	N/A	N/A
Rose Ann Castro	Malaya, Labo, CN	Parent of former CL	F	N/A	N/A
Annabelle Villacruz	Malaya, Labo, CN	Parent of former CL	F	N/A	N/A
Dolores Castro	Malaya, Labo, CN	Parent of former CL	F	N/A	N/A
Cristina Maristela	Malaya, Labo, CN	Parent of former CL	F	N/A	+639360239314
Ailyn Barsaga	Malaya, Labo, CN	Parent of former CL	F	N/A	+639066231421
Hermelina Tabagan	Malaya, Labo, CN	Parent of former CL	F	N/A	+63935358106
Amelita Pura	Malaya, Labo, CN	Parent of former CL	F	N/A	N/A
Nida Pedir	Malaya, Labo, CN	Parent of former CL	F	N/A	N/A
Kyle Justin Data	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Michaela Ramos	Gumaus, Paracale, CN	Former CL	F	N/A	N/A
Danica Relagio	Gumaus, Paracale, CN	Former CL	F	N/A	N/A
Rommel Miñofranco	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Joan Nano	Gumaus, Paracale, CN	Former CL	F	N/A	+639488710418
Princess Ericha Jerez	Gumaus, Paracale, CN	Former CL	F	N/A	N/A
Arian Mae Manuel	Gumaus, Paracale, CN	Former CL	F	N/A	+639955289096

Name	Organization	Position	Sex	Email	Telephone
Jennylyn Cis	Gumaus, Paracale, CN	Former CL	F	N/A	N/A
Reymond Calujate	Gumaus, Paracale, CN	Former CL	M	N/A	+639676029202
Gian Lazarte	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Giovanie Palma	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Francis Aron Palmero	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Jun Vic Dumanig	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Ranzel Luiz Andes	Gumaus, Paracale, CN	Former CL	M	N/A	N/A
Abegail Pahona	Gumaus, Paracale, CN	Former CL	F	N/A	+639077773321
Trisha Jane Sucilan	Gumaus, Paracale, CN	Former CL	F	N/A	N/A
Emily Lopez	Gumaus, Paracale, CN	Parent of former CL	F	N/A	+639301614474
Maybelle Andes	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Virginia Quezon	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Elma Gerez	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Juvelyn Cis	Gumaus, Paracale, CN	Parent of former CL	F	N/A	+639484950890
Cherie Velarde	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Angelita Manuel	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Gina Vergara	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Rosalie Palmera	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Rebecca Dumanig	Gumaus, Paracale, CN	Parent of former CL	F	N/A	N/A
Mary Rose Data	Gumaus, Paracale, CN	Parent of former CL	F	lovelyrhozeolen@yahoo.com	+639213131334
Romeo Sucilan	Gumaus, Paracale, CN	Parent of former CL	M	N/A	N/A
Jerome Agris	Construction, Manila	Plumber	M	N/A	N/A
Jelmer Dames	Construction, Manila	Plumber	M	N/A	N/A
Rosalinda Aquino	Gumaus, Paracale, CN	Electronics	F	N/A	+639663227272
Elamae Torres	Gumaus, Paracale, CN	Electronics	F	N/A	N/A
Jan Marthel Edquilang	Gumaus, Paracale, CN	Electronics	F	N/A	N/A
Monica Jean Sucilan	Gumaus, Paracale, CN	Electronics	F	N/A	+639460420122
Maribeth Bares	Gumaus, Paracale, CN	Electronics	F	N/A	+639465288809
International Organizations					
Benjamin Katz	OECD	Policy Analyst	M	benjamin.cazz@gmail.com	+12672376036
Baptiste Coue	ARM	African Projects Coordinator	M	baptiste.coue@gmail.com	+33549264231
Rachel	World Bank	Senior Mining Specialist	F	rperks@worldbank.org	(202) 458-8824
ILO-Geneva					
Alexandre Soho	ILO	Senior Program Officer	M	soho@ilo.org	+41779656473
USDOL-ILAB-OCFT					
Pilar Vazquez	USDOL-ILAB-OCFT	GOR	F	velasquez.pilar@dol.gov	

Annex F: Analysis of Project Performance

While the project reports on both output and outcome indicators, the following analysis is focused on the outcomes, specifically the indicators for outcomes (OTC) and sub-outcomes (SO). Since this is the final evaluation, it is more appropriate to assess results by focusing on the outcome or effect level rather than the output level, which is what the evaluators have done in this section.

Table 1 shows the project's development objective, its indicator, end of project indicator target, achievements against the indicator target as of April 2019, and the overall performance status.

Table 1: Indicators, Indicator Targets, and Achievements for the Project Objective⁴⁴

Indicator	Achieved April 2019	EOP Target	+/- Status
Ghana, Philippines and Global capacity to reduce CL and improve WC in ASGM increased			
Number of countries, regional bodies and government institutions, social partners and international civil society groups that take significant actions to reduce CL and improve WC in ASGM	16	17	-1

The project reported that six countries, four government institutions, and six civil society organizations, took significant actions to reduce CL and improve WC in the ASGM sector. These are summarized below.

- Collaborated with FON to organize a networking meeting for 22 delegates from Malawi and Zambia who were briefed about the project's activities (2 countries).
- Provided information on ASGM WC to participants from Nigeria, Sierra Leone, Tanzania and South Africa in an international conference in Ghana (4 countries).
- Technical assistance to MLNR and MELR to develop the MMIP and NPA 2 (2 government institutions).
- Technical assistance to MLNR/MC and MELR/CLU to develop ASGM monitoring tools and a mechanism for CL free zones (2 government institutions).
- Communicated with FON and Solidaridad about joint actions on WC and CL issues in ASGM that resulted in the meeting mentioned above with FON (2 civil society organizations).
- Provided information to FON, OXFAM Fun for Peace, and National Resource Governance Institute on ASGM WC as they prepared to commence an ASGM projects and research activities (4 civil society organizations).

The project provided information to six countries (Malawi, Zambia, Nigeria, Sierra Leone, Tanzania, and South Africa) about project activities and ASGM WC during meetings and

⁴⁴ CARING Gold Mining Project Technical Progress Report, April 2019.

workshops. These six countries were counted as taking significant actions to address CL and WC in ASGM because they participated in these events. **However, according to the definition in the CMEP, significant actions should result in relevant reduction of CL and improved WC in ASGM such as by-laws formulated, standards adopted, support services provided to the vulnerable, adoption of manuals or modules, and learning visits in the Philippines and Ghana. The evaluators do not believe that providing information to six countries meets the definition of significant actions and, thus, should not be counted.**

The project reported that it discussed collaborating with FON and Solidaridad on joint activities around WC in the ASGM sector. FON took a significant action by organizing a networking meeting for delegates from Malawi and Zambia. The project counted Solidaridad because it participated in various meetings. Again, the evaluation team questions whether organizing a workshop and participating in meetings is taking a significant step to address CL and WC in the ASGM sector as defined in the CMEP.

Regarding the last bullet point above, the project reported that it provided information to four civil society organizations that were in the process of beginning ASGM projects and research. **It is not clear, however, how many of these organizations actually used information provided by the project to inform their ASGM projects. This should be clarified by the project in the next reporting cycle.**

Table 2 shows OTC 1 and its indicators, its four supporting outcomes and their indicators, end of project indicator targets, achievements against the indicator targets as of April 2019, and the overall performance status. Regarding the first indicator for OCT 1, the project targeted the adoption of six laws, policies, and action plans including four in Ghana and two in the Philippines. The project reported an achievement of four targets in Ghana including the NPA 2, MMIP, district medium-term development plans for Adansi North and Aowin. At the time of the evaluation, the Philippines was working on the draft amendment to the People's SSM Act and the NAP for ASGM. At the subnational level, the project was able to include CL interventions in the 2020 Labo Municipal Development Plan using the results of the expanded CBMS with the CL rider piloted in Camarines Norte.

The targets for the second indicator for OCT 1 include the implementation of five laws, policies, and action plans for Ghana and three for Philippines. In the April 2019 TPR, the project reported an achievement of three for Ghana and zero for Philippines. In Ghana, GNASSM supported both Adansi North and Aowin with the implementation of their medium-term development plans. The Philippines reported zero achievement for this indicator because the draft amendment to the People's SSM Act, the proposed revisions to DENR Administrative Order 2015-03 on the revised IRR for the People's Small-Scale Mining Act, and the ASGM NAP are still works in progress. **However, it looks doubtful that the amendment to the People's SSM Act will be passed and implemented during the life of the project.**

The indicator for SO 1.1 is the *number of national and local institutional legal frameworks that are amended to address child labor and working conditions*. Both countries set a target of two and reported one achievement. In Ghana, the project helped Adansi North to develop CL by-

laws that have been disseminated. It intended to do the same for Aowin but during the course of project implementation the project discovered that by-laws already existed. In the Philippines, the project collaborated with government agencies to create an interagency technical working group with a sub-committee dedicated to ASGM.

Table 2: Indicators, Indicator Targets, and Achievements for Outcome 1⁴⁵

Objectives and Indicators	Achieved April 2019	EOP Target	+/- Status
OTC 1: Laws, policies and action plans to address child labor and/or working conditions in ASGM are adopted and/or enforced and implemented			
Number of laws, policies or action plans to address CL and WC in ASGM adopted	4	6	-2
Number of laws, policies or action plans to address CL and WC in ASGM enforced or implemented	3	8	-5
SO 1.1: Child labor and working conditions addressed in national and local laws, policies, development plans, regulations, licensing contracts, action plans and budget allocations			
Number of national and local institutional legal frameworks that are amended to address child labor and working conditions	2	4	-2
SO 1.2: Inter-agency coordination mechanisms at national and local levels implemented			
Number of interagency coordination mechanisms implemented	6	9	-4
SO 1.3: Interagency protocols and tools to improve enforcement utilized			
Number of protocols and tools applied by stakeholders	3	4	-1
SO 1.4: Stakeholder knowledge on CL and working conditions, including OSH, improved			
Percent of stakeholders trained who have an increased score from pre and post-test results and can identify concerns relating to WC and CL in ASGM including OSH	57/24	70/60	-13/-36

The indicator for SO 1.2 is *number of interagency coordination mechanisms implemented*. Ghana set a target of five mechanism implemented while the Philippines set a target of four. In the April 2019 TPR, the project reported that Ghana achieved two mechanisms including (1) working with a telecommunications company to provide telephone access to community residents in project communities to register for national health insurance and (2) collaborating with the MC to develop ASGM monitoring tools. **It should be noted that while**

⁴⁵ CARING Gold Mining Project Technical Progress Report, April 2019.

the ASGM monitoring tools were developed, MC has not yet implemented them, which would mean the actual achievement should be one instead of two.

In the Philippines, the project achieved four coordinating mechanisms including the SHIELD technical working group at the national and local levels, the interagency technical working group with the ASGM sub-committee, the joint monitoring team composed of DOLE, DSWD, ILO, BAN Toxics and the provincial government of Camarines Norte, and the multi-stakeholder monitoring and certification team in South Cotabato. The latter, however, is not functioning because CG does not have a practical business model. **In effect, there were only three functional coordinating mechanisms in the Philippines.**

The indicator for SO 1.3 is the *number of protocols and tools applied by stakeholders*. Both Ghana and the Philippines set a target of two protocols and tools. As of April 2019, the project reported that Ghana achieved two and the Philippines achieved one. In Ghana, community-based monitoring tools were developed and are being implemented by the CCPCs. These include the community register, CL monitoring tool, and the referral mechanism to district offices. It should be noted that the community register and CL monitoring tool appears to be effective but the referral mechanism is weak. Based on interviews, CCPC members do not believe the district offices are responsive when CL cases are referred.

In the Philippines, the project collaborated with the DSWD to develop SHIELD that includes the CLLR to monitor CL. The CLLR is being used by DSWD and DOLE to monitor CL in communities. The evaluators noted that CLLR software is not currently being used because it does not comply with encryption requirement stipulated in the Data Privacy Act, which DSWD is working to resolve. Meanwhile data were entered manually.

The second monitoring product is an online open mining registration portal that has been developed to expedite and make transparent the application process for mining permits, which is often delayed by bureaucratic procedures. Data normalization is ongoing to ensure logical and user-friendly information. The project, in collaboration with the CBMS Network Office, also developed a CBMS rider tool on CL that provided Labo municipality with the data and analysis needed to identify appropriate interventions to reduce CL and improve WC in SSM.

The indicator for SO 1.4 is the *percent of stakeholders trained who have an increased score from pre and post-test results and can identify concerns relating to WC and CL in ASGM including OSH*. Ghana and the Philippines set targets of 70 percent and 60 percent, respectively. In April 2019, the project reported a 57 percent increase in knowledge for Ghana while the Philippines reported a 24 percent increase in knowledge. **However, during the course of assessing this indicator target achievement, the evaluation determined that instead of reporting the percent of stakeholders who increased test scores, it reported the percent increase knowledge based on the in test scores.** The evaluation report includes a recommendation to review how this indicator is calculated and reported to ensure consistency with the guidance in the PMP.

Table 3 shows OTC 2 and its indicators, its two supporting outcomes and their indicators, end of project indicator targets, achievements against the indicator targets as of April 2019, and the overall performance status. OTC 2 has two indicators. The first is the *number of relevant social protection and livelihood programs introduced or expanded to benefit ASGM communities in project target areas*. The project set a target of four programs for Ghana and six for the Philippines.

In Ghana, the project reported an achievement of three programs or services that were linked to communities. These include the registration of 522 households in the national NHIS, the introduction of school feeding in one school in Adansi North, and the enrollment of households to LEAP program. At the time of the evaluation, the project was unable to specify the exact number of households enrolled with LEAP because the information was not available from the government. Based on interviews with district officials, the number enrolled in LEAP appears to be modest.

In the Philippines, the project reported an achievement of six programs or services linked to communities. These include 730 households receiving DOLE emergency livelihood starter-kits for displaced miners, 23 households receiving DOLE livelihood starter-kits for child laborer families, 31 households receiving educational support, 26 households receiving vocational and skills training, 19 households receiving medical services, and 39 households receiving national health insurance. ASGM communities in South Cotabato would have wanted more livelihood assistance but said they did not have the capacity to develop a technical proposal for such requests.

Table 3: Indicators, Indicator Targets, and Achievements for IO 2⁴⁶

Objectives and Indicators	Achieved April 2019	EOP Target	+/- Status
OTC 2: Access of vulnerable households living in ASGM communities to relevant social protection and livelihoods programs is improved in Ghana and the Philippines			
Number of relevant social protection and livelihood programs introduced or expanded to benefit ASGM communities in project target areas	9	10	-1
Number of miners and other community members provided with training related to improved livelihood operations	229	160	+69
SO 2.1: Stakeholders/institutions mobilized to improve access to social protection and livelihood programs by ASGM communities			
Number of stakeholders/institutions who are mobilized by project to provide social protection or livelihood programs to ASGM communities	8	14	-4
SO 2.2: Ability of ASGM communities to articulate their needs and requests for support and services increased			
Number of requests for support and services by ASGM communities	2	13	-11

The second indicator is the *number of miners and other community members provided with training related to improved livelihood operations*. The project set targets of 60 and 100 for Ghana and the Philippines, respectively. Based on the April 2019 TPR, Ghana exceeded the target by 45 persons trained. GNASSM reported that, in collaboration with NBSSI-BAC, 105 miners and community members were trained on entrepreneurial and financial skills.

In the Philippines, the project exceeded its target by 24 persons trained in livelihoods by BAN Toxins and linked to DOLE livelihood starter kits. **The evaluation team understands that the project significantly exceeded its targets in both countries given the strong interest of community members to receive livelihood-related training. This was confirmed by the evaluators during interviews with miners and other community members.**

The indicator for SO 2.1 is the *number of stakeholders/institutions who are mobilized by project to provide social protection or livelihood programs to ASGM communities*. The project set a target of six stakeholders mobilized for Ghana and eight for the Philippines. In Ghana, the project reported that a private company and two government institutions were mobilized to provide social protection services to communities. These are the same ones reported previously for OTC 2 and include a telecommunications company and NHIS to

⁴⁶ CARING Gold Mining Project Technical Progress Report, April 2019.

facilitate the registration of households in NHIS and MGCSP for one school feeding program and enrollment in LEAP.

In the Philippines, the project managed to mobilize five institutions including DOLE (livelihood starter kits), DSWD (education assistance), TESDA (vocational training), LGU-Labo (medical assistance), and LGU Paracale (medical assistance). The only planned institution that project has not yet linked to communities is DTI because the project is waiting on DTI's *One Town, One Product Report* to determine how to proceed.

The indicator for SO 2.2 is the *number of requests for support and services by ASGM communities*. The project set a target of 10 for Ghana and three for the Philippines. In Ghana, the project reported that two requests for services were made. The two assembly persons representing the four targeted communities each made a request for a package of services including school feeding, LEAP, health insurance, and business training programs. While it appears that Ghana is under-performing on this indicator, the problem is how the indicator target was set. According to the M&E officer, the project assumed that each of the four target communities would have one assembly representative who would make a request for at least two or three of the four services listed above. Instead, one assembly person represented two project communities and made one request that included the four services, resulting in two requests. In the Philippines, the project reported zero requests but that two proposals for DOLE livelihood assistance have been prepared and will be submitted and reported in the next TPR.

Table 4 shows OTC 3 and its indicator, its two supporting outcomes and their indicators, end of project indicator targets, achievements against the indicator targets as of April 2019, and the overall performance status. The indicator for OTC 3 is the *number of monitoring mechanisms in supply chains implemented by ASGM actor*. The project set a target for Ghana of five monitoring mechanisms and one for the Philippines.

In Ghana, the project reported in April 2019 that it had implemented two community-based monitoring tools including the community registry, CL monitoring tool, and referral mechanism in its four target communities. Due to the mining ban, the three WC tools were delayed. During the evaluation, the evaluation team noted that the WC tools were developed but have not yet been fully implemented by MC.

The Philippines, on the other hand, developed one supply chain monitoring mechanism, the CLLR, which has been implemented by both DSWD and the project under the SHIELD initiative. The second indicator target was the online mining portal that profiles miners and tracks the mining registration process. The portal has been developed and will be launched at the Provincial Integrity Forum in December 2019.

The indicator for SO 3.1 is the *number of ASGM monitoring mechanisms developed or improved*. The project set targets of five and two for Ghana and the Philippines, respectively. In Ghana, the project reported that it achieved all five ASGM monitoring mechanisms including the community registry, CL monitoring tool, and the referral mechanism noted

above as well as mine-level WC tools. These include code of practice, employee register, and mining site log books.

In the Philippines, the project reported one ASGM monitoring mechanism achieved, which was the CLLR mentioned previously. The other monitoring mechanism that has been developed but not fully implemented is the mining online portal that profiles miners and provides up-to-date information on mining registrations. The CBMS is another monitoring tool improved by the project with the inclusion of CL rider. This initiative, however, was only piloted in Labo, Camarines Norte. While it provided information on the profile and WC ASGM child laborers and their families and its results were disseminated at the national and local levels to encourage wider use of the tool, it has not yet been adopted by the PSA.

Table 4: Indicators, Indicator Targets, and Achievements for IO 3⁴⁷

Objectives and Indicators	Achieved April 2019	EOP Target	+/- Status
OTC 3: Mechanisms to increase monitoring of CL and WC in gold mining supply chains, particularly ASGM, are developed and implemented in Ghana and the Philippines			
Number of monitoring mechanisms in supply chains implemented by ASGM actor	3	6	-3
SO 3.1: Mandated Government agencies and other stakeholders improve monitoring in ASGM with a focus on CL and WC			
Number of ASGM monitoring mechanisms developed or improved	6	7	-1
SO 3.2: Awareness of stakeholders on CL and WC in ASGM, including but not limited to monitoring mechanisms increased			
Number of awareness raising campaigns on CL and WC issues carried out by stakeholders without project support	14	13	+1
Percent of stakeholders who have increased awareness on CL and WC issues in ASGM from baseline	0%	60%	-60%

SO 3.2 has two indicators. The first indicator is the *number of awareness raising campaigns on CL and WC issues carried out by stakeholders without project support*. The project set targets of eight and five for Ghana and the Philippines, respectively. In Ghana, the project reported that it exceeds the target by four awareness raising campaigns. These include the following:

- World Day Against Child Labor implemented by MERL (counts as one)
- Awareness campaign by Adansi-North district team to solicit support for the development of by-laws (counts as one)
- Social mobilization against child labor awareness campaign (counts as one)

⁴⁷ CARING Gold Mining Project Technical Progress Report, April 2019.

- GNASSM's "no child on site" CL awareness campaign in Adansi North (counts as one)
- FON and Solidaridad improving WC through their current projects (counts as two)
- CL radio programs (counts as two)
- Awareness raising visit to a project community in Aowin municipality by municipal team (counts as one)
- CL awareness raising activities in five communities in Adansi North district including the dissemination of CL by-laws (counts a five)

It should be noted that the actual indicator target achievement of Ghana should be 14 instead of 12. The project should make this adjustment in the October 2019 TPR.

In the Philippines, the project reported it achieved two campaigns, which were *World Day Against Child Labor* and *Caravan of Services* to communities. The project intends to complete information, education, and communication online activities in the coming months before the project ends.

The second indicator for SO 3.2 is the *percent of stakeholders who have increased awareness on CL and WC issues in ASGM from baseline*. The project set a target of 60 percent for both Ghana and the Philippines and intends to report the achievement of this indicator target once the end-line survey report is published. At the time of the evaluation, the survey was complete, but the report had not been finalized.

Table 5 shows OTC 4 and its indicator, its two supporting outcomes and their indicators, end of project indicator targets, achievements against the indicator targets as of April 2019, and the overall performance status. OTC 4's indicator is the *percent of targeted global networks operational*. The project set a target of 30 percent and reported that 40 percent of the targeted global networks are operational. The project targeted seven networks including AGC, ARM, OECD, WB, Levin Sources, Economic Community of West African States (ECOWAS), and the Global Mercury Partnership.

As of April 2019, the project reported that three are operational including ARM and the use of the CRAFT code, OECD and its support of the ASGM global conference in Manila, and discussions with WB the use of *Delve*, which is the WB's global platform on ASM data. Based on interviews with representatives from these institutions, the evaluation team acknowledges that the project has collaborated with them on ASM issues. **However, the evaluation team does not believe that this collaboration constitutes operationalizing global networks.** Perhaps the indicator should have been stated as the *number of global ASM initiatives with whom the project collaborated with and made contributions to on CL and WC in the ASGM sector*.

Table 5: Indicators, Indicator Targets, and Achievements for IO 4⁴⁸

Objectives and Indicators	Achieved April 2019	EOP Target	+/- Status
OTC 4: Global networks to reduce child labor (CL) and improve working conditions (WC) in ASGM are operational			
Percent of targeted global networks operational	40%	30%	+10%
SO 4.1: Coordination among global networks and stakeholders is enhanced			
Number of coordination platforms enhanced	1	2	-1
SO 4.2: Innovative solutions and lessons learned are disseminated			
Number of innovative solutions and lessons learned disseminated	0	3	-3

The indicator for SO 4.1 is the *number of coordination platforms enhanced*. The project set a target of two coordination platforms and reported in the April 2019 TPR that one platform had been enhanced, which was the OECD Forum for Responsible Mineral Supply Chain. According to an OECD representative, OECD does not really have a platform and already had strong capabilities in the ASM sector but its participation in the Manila conference was important because OECD learned about a variety of responsible sourcing initiatives around the world. **Again, based on the interview, it is not entirely clear to the evaluators whether OECD’s Responsible Mineral Supply Chain is a platform and whether it was enhanced by participation in the conference.**

The indicator for SO 4.2 is the *number of innovative solutions and lessons learned disseminated*. The project set a target of three innovative solutions and lessons learned, which have not been achieved. According to project staff, innovative solutions such as mine formalization, alternatives to mercury, and the CRAFT code will be addressed during the no-cost extension if approved.

⁴⁸ CARING Gold Mining Project Technical Progress Report, April 2019.