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iTrack
Evaluation

ILO EVALUATION

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INDEPENDENT MID-TERM EVALUATION OF INTERNATIONAL LABOUR AND ENVIRONMENTAL STANDARDS APPLICATION IN PAKISTAN'S SMES (ILES)

JANUARY 2021

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DWCP	Priority 2 Promoting job creation for youth and vulnerable groups Priority 3 Strengthening ILS compliance through social dialogue
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Technical Backstopping Unit	DWT/CO New Delhi
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Timing of Evaluation	Mid-term
Evaluation Manager	Rattaporn Pongpattana, Monitoring and Evaluation Officer, ILO Regional Office for Asia and the Pacific

“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”

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Acronyms

AWS	Alliance for Water Stewardship
BW	Better Work
CO	Country Office
DWCP	Decent Work Country Programme
EFP	Employers' Federation of Pakistan
EPA	Environment Protection Authority
EU	European Union
EVAL	
FOACB	Freedom of Association and Collective Bargaining
FTCC	Federal Tripartite Consultative Committee
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GoP	Government of Pakistan
GSP+	Generalized Scheme of Preferences
GTF	Garments, Textile and Footwear
ILES	International Labour and Environmental Standards project
ILO	International Labour Organization
ILS	International Labour Standards
KP	Khyber Pakhtunkhwa
LDR	Labour Dispute Resolution
MEA	Multilateral Environmental Agreement
MTE	Mid-Term Evaluation
MCC	Ministry of Climate Change
MOPHRD	Ministry of Overseas Pakistanis and Human Resource Development
NLPF	National Labour Protection Framework
NGO	Non-Governmental Organization
OSH	Occupational Safety and Health
P&D	Planning and Development
PCRWR	Pakistan Council of Research in Water Resources
PHME	Pakistan Hosiery Manufacturers Association
PRGMEA	Pakistan Readymade Garments Manufacturing and Exporter Association
PMP	Project Monitoring Plan
PTA	Pakistan Tanners Association
PTCC	Provincial Tripartite Consultative Committee
PWF	Pakistan Workers' Federation
RMG	Readymade garment
ROM	Result Oriented Monitoring
SCORE	Sustaining Competitive and Responsible Enterprises
SDG	Sustainable Development Goals

SEMP	Smart Environmental Management Practices
SMEDA	Small and Medium Enterprise Development Authority
SME	Small and Medium Sized Enterprise
TOC	Theory of Change
UNDP	United Nations Development Programme
UNIDO	United Nation Industrial Development Organization
WWF	World Wide Fund for Nature

EXECUTIVE SUMMARY

Project and Evaluation Overview

The evaluation office of the International Labour Organization (ILO) commissioned an independent evaluation team to design and conduct a Mid-Term Evaluation (MTE) of International Labour and Environmental Standards (ILES) application in Pakistan's Small and Medium Enterprises (SMEs) implemented by the ILO and Worldwide Fund for Nature (WWF) and funded by the European Union (EU).

The evaluation's goal was to review the progress made toward achieving intended results and outcomes, identify lessons learned, and recommend possible programmatic adaptations during the programmes final implementation period. The evaluation drew on primarily qualitative and quantitative data collected from programme stakeholder interviews, online surveys and programme documents and financial reports as well as secondary research. This report presents the evaluation's principal findings, conclusions, and recommendations.

Findings and Conclusions

Relevance, Design Validity and Coherence

Improving compliance with international and national labour and environment laws and standards in Pakistan's textile/leather sector remains a high priority among evaluation respondents. Stakeholder acknowledgement of the need for improvements notwithstanding, various evaluation respondents cited wide-ranging priorities for assistance in order attain higher levels of compliance. Given the scope of needs and the project's modest resources, ILES' objectives were relatively ambitious, even though its sector and geographic targeting and the projects relatively longer duration strengthened the project design.

Various stakeholders agreed that textile and leather SMEs are in greater need of external support to boost their compliance while, with donor acceptance, in both its labour and environment components, ILES has served many large, export-oriented enterprises. Strong external drivers of compliance improvements such as trade agreements and brand/buyer pressure affect smaller, domestic market-focused enterprises to a much lesser extent. WWF's approach of targeting of "progressive" and "non-progressive" enterprises appears to be a useful approach to ensure that ILES contributes to progress but does not target primarily the most advanced enterprises. Moreover, such an approach ensures that the business cases developed through the project reflect enterprises at different starting points in terms of their labour and environmental compliance, if not primarily small and medium enterprises.

ILES' 2018 logframe revision was effective focusing the labour component's enterprise level intervention strategy, but less so its policy and capacity building interventions which continued to lack specificity. Overall, the environment component's bottom-up intervention logic was strong and consistent. At the time of the evaluation, the labour component's policy/capacity building component was lacking clear focus overall as well as strong strategic linkages between the policy, institutional capacity building and enterprise level intervention strategies. Although

the labour component featured successful interventions, limited synergies between them diminished the component's overall relevance and coherence to date. Based on its workplans, ILES' labour component initiated and planned additional policy and constituent capacity building work in 2020, which was delayed by the onset of the pandemic. Much of this work has been reprogrammed and expanded in 2021, and if carried out may lead to a more focused policy and capacity building intervention strategy.

In contrast, linkages between WWF's different environment intervention strategies were stronger: assess enterprise level/city-wide opportunities to improve environmental practices → pilot solutions → draw conclusions/demonstrate benefits → inform/influence institutional policy and programs and public opinion. Moreover, WWF's largely disciplined focus on target industries and their key "problem areas" was useful to maximize project results as well as to produce good practices and lessons learned that might benefit the whole industry. WWF's green finance and awareness raising/communication activities likewise appear strategically important and complementary to its enterprise level facilitation approach.

ILES has been largely effective coordinating its work with other similar initiatives in Pakistan. However, potential synergies between WWF and ILO programming have not yet been exploited to their full potential. An example of effective coordination was ILO's decision to focus labour component activities in Sindh, avoiding unnecessary competition with similar GIZ activities in Punjab. Within the ILO country programme, ILES coordination with Better Work, potentially soon to be the largest ILO programme in Pakistan, has likewise been effective. ILES has taken a complementary approach in its enterprise level interventions and has helped Better Work address some anticipated risks in recent assessment on Freedom of Association and Collective Bargaining (FOACB) and Labour Dispute Resolution (LDR). It could do more. The two programmes together, as well as ILO's DG Trade funded project share commonalities (same sector and/or compliance focus) that make joint strategic planning useful. Similarly, closer integration of ILES' labour and environment components in enterprise level activities offer promising opportunities for synergies (importance of workplace cooperation on both sides and the intersection of OSH and good environmental practices). There may likewise be opportunities for synergies between WWF and Better Work, if/when the programme is established in Pakistan.

Implementation progress and effectiveness, impact orientation, and sustainability

ILES' labour component has produced notable achievements, but progress on several planned outputs is lagging. Achievements included: advancing Government of Pakistan (GOP) submission of ILO instruments to the Competent Authority/ies as a step toward implementation of ILO Conventions and Recommendations; support for Sindh Rules of Business which define how provincial labour laws should be implemented, and; recent FOACB and LDR assessments, which highlighted gaps and suggested relatively well-defined follow-on actions for which there appear to be national stakeholder buy in. At the enterprise level, ILES successfully launched two out of three planned enterprise support programmes, completing planned Occupational Safety and Health (OSH) training for 100 enterprises, and initiating the Sustaining Competitive and Responsible Enterprises (SCORE) programme in 20 of 50 planned enterprises. Participants in enterprise programmes reported small but positive changes in working conditions and cooperation between workers and management.

ILES' environment component is progressing steadily toward most planned outputs producing positive outcomes such as leveraging target enterprise investments in environmental upgrades, conserving resources, and increasing productivity. Key policy level/capacity building achievements include support for the draft Sindh Environmental Protection Agency's Clean Production Policy, expansion of city-wide partnerships and mobilizing corporate social responsibility investments in municipal water management, integration of green tanneries guidelines in Sialkot Tannery Zone bylaws and collaboration with the State Bank of Pakistan on green financing guidelines. At the enterprise level, ILES' Smart Environmental Management Practices (SEMP) programme conducted environmental assessments in 65 enterprises and post assessments in 34. ILES' draft business case documented that target enterprises that implemented project recommendations realized significant water, electricity, gas, wood and coal use savings. Moreover, the first textile enterprise to achieve Alliance for Water Stewardship (AWS) 2.0 certification was an ILES partner.

ILES faced a variety of challenges that hindered progress. Key challenges included coordinating policy interventions between the federal and provincial levels, overcoming counterpart capacity constraints (e.g. few and changing GOP counterpart personnel, financial resource constraints) and identifying shared priorities. ILO interventions were also hindered by its main constituents' sensitivities on ILES cooperation with other partners. Project workplace cooperation methodologies came up against deeply held beliefs favouring traditional hierarchies and gender roles while lack of awareness of the negative consequences of poor environmental management as well as technical knowhow and financial means to implement solutions hindered more rapid adoption of SEMP. Finally, government and ILO mandated Covid-19 travel restrictions and social distancing hindered nearly all activities requiring travel and/or large, face-to-face gatherings planned in the last three quarters of 2020. Covid-19 challenges and risks continue, suggesting the need for project contingency plans anticipating stakeholders' different rates of recovery from Covid-19 in the coming year.

ILES' larger objectives benefit from relatively strong national stakeholder ownership which the project has leveraged to different degrees in its policy/capacity building and enterprise support interventions. ILES has only been modestly effective linking labour and environmental reforms and their implementation to broader, and arguably higher priority economic competitiveness and commerce policies. On the labour side, meeting GSP+ reporting obligations and facilitating the Buyers' Forum collaboration with the Ministry of Commerce intersected effectively with trade and competitiveness concerns. On the environment side, the draft Sindh Clean Production Policy and planned green financing guidelines broaden the State's largely punitive approach on environmental compliance to include more emphasis on the public sector role in helping industry achieve resource-saving environmental upgrades and practices. Likewise, green tannery guidelines and model designs were mainstreamed in a leather sector modernisation initiative in Sialkot. On the enterprise level, industry leaders emphasized that to have their continued commitment, ILES needed to demonstrate its programmes contributed to increased productivity and/or profitability. Evaluation findings suggest ILES has had some success in this area. WWF's progressive enterprise partners demonstrated ownership for project objectives by investing over USD 1 million of their own funds in environmental upgrades. On the labour side, the Employers Federation of Pakistan's (EFP) enthusiasm for SCORE is likewise a positive sign of ownership.

ILES has taken initial steps to promote the continuation of ILES interventions by national institutions but needs a more comprehensive exit strategy, especially for enterprise services. ILES has developed a cadre of qualified national SCORE trainers but has not yet designated an anchor organization or developed a business plan for programme continuity. On the environment side, ILES worked with several national institutions to deliver services to its enterprise partners and engaged academic institutions in research activities but likewise has not yet outlined a business model for continuing enterprise support services.

Resource use efficiency

The environment component's higher activity volume, greater progress toward targets, and higher activity budget expenditure rates suggests it was more efficient than the labour component, although both components featured examples of effective strategies to increase cost-effectiveness. ILES's 2018 budget revision reduced ILO administrative costs and increased budget allocations for activities. Likewise, ILES effectively mobilised ILO labour specialists and local environmental and labour ((to a lesser extent) organizations as well as academic institutions to achieve project results cost-effectively. While both sides of the project were negatively affected by Covid-19, the labour component also experienced other early setbacks including its several months long recruitment process, lengthy strategy and budget revision, and a leadership gap due to illness. WWF appeared to benefit from a larger implementation team with greater proximity to interventions zones. As a result of slower than planned spending and local currency depreciation, ILES has sufficient resources to extend implementation by at least a year and half, if not longer. An extension would likely allow the labour component to reach more of its objectives and for both components to consolidate and document results.

Visibility

ILES regularly communicated about its activities, making some progress raising the profile of labour and environmental issues in Pakistan but may do more. ILES trained media on environmental issues which aimed to promote higher levels and more informed press coverage of ILES activities. Both ILO and WWF developed communication materials about the project as well as project topics which were made visible on their websites and using some forms of social media. Evaluation respondents were largely aware of EU funding for ILES as well as the GSP+ benefit conferred on Pakistan by the Community. Although present in steering committee, ILES has not significantly amplified EU voice and concerns regarding Pakistan's labour and environmental compliance.

Recommendations

For ILES team:

1. To increase strategic coherence between enterprise and policy level interventions, develop synergies with productivity enabling environment stakeholders/programmes using mainstreaming approaches to promote compliance and improved practices.
 - Increase cooperation with MCC and Industry Associations- potentially expanding the project steering committee

- Explore possible linkages to investment/business facilitation policy and programs: for example, Export Processing Zones, Sialkot Tannery Zone and similar initiatives
2. Based on current and projected expenditures, develop strategy and detailed plan for no cost extension to be submitted to donor for its consideration.
- Revise budget and update logframe targets and indicators as necessary. For example, develop indicators related to the specific roll out and expected outputs and outcomes of activities on FOACB and labour dispute resolution to replace generic indicators under result 1.1 and measure specific expected changes in institutional behaviors.

For ILO/ILES

1. In consultation with ILO Country Office and considering possible arrival of Better Work Pakistan, continue to narrow the focus of policy/capacity building interventions in remaining implementation period.

- Maintain strong focus on Sindh province. Work in other geographic areas should be strongly justified
- Strengthen linkages between policy, capacity building and enterprise work, for example by reinforcing cross-cutting OSH linkages.
- Follow through on studies: Non-standard forms of employment, FOACB and LDR

2. Move forward with productivity program for 25 pilot enterprises keeping SCORE's workplace cooperation module at the core of the new programme. The terms of reference for the new programme should likewise require gender integration: female participation on committees, training for female workers (BW female supervisor training shown to improve productivity), accommodation for female workers (childcare and breast-feeding facilities). The new programme should feature a baseline and post-intervention data collection strategy so that ILO can develop and communicate the business case for programme interventions, including workplace cooperation.

3. Build capacity of EFP and SCORE trainers to develop a business plan to manage and market SCORE to industry post ILES. The plan might include a framework that would allow EFP to engage the services of SCORE trainers and offer SCORE training to members and others as an income generating service. The target market for SCORE training might include ILES targeted garment and leather enterprises as well as other enterprises from other industries.

4. Consider locating project personnel (regular ILO staff or ILO sub-contractor personnel) in Sindh. More clearly delineate programme managers responsibilities between enterprise level and broader institutional capacity building and policy level interventions.

For WWF/ILES:

5. Develop an exit strategy for SEMP and AWS enterprise facilitation interventions. In this context, explore possible synergies with Better Work.
6. Continue green financing guidelines work and plans to develop proposal for green financing facility. Consider developing a differentiated strategy for financing SMEs.
7. Consider intensifying support for the Sindh EPAs based on gap-analysis research and capacity building needs related to the implementation requirements of the Clean Production Policy.
8. Consolidate data and analyze trends in enterprise level audits and include with planned business cases. Based on results, develop industry-oriented briefs on topics of common concern with practical advice on “good practices.”
9. Continue to facilitate networking and knowledge-sharing among key stakeholders (factory management, academia, government technical personnel): host topical and knowledge-sharing events. Consolidate participant database and target past participants with newsletter, technical briefs and/or invite to join online/offline community of practice.
10. Explore opportunities to integrate gender in activities. Some potential avenues include gender-focused research, one or more gender-focused pilot activity within city-wide partnerships, support to network female environmental engineers/engineering students.

For ILO Country Office:

11. Assess and develop longer-term integrated textile and leather strategy and develop new projects on high priority work areas not effectively addressed by ILES or other projects. Areas of work may include minimum wage setting mechanisms, extending social protection to home-based workers, labour inspection strengthening, and broad-based labour law reforms/labour protection framework follow-up.

For EU Pakistan delegation:

12. Continue to highlight outstanding concerns about Pakistan’s compliance with international labour standards and multinational environment agreements in meetings with government officials and bi-annual GSP+ reviews
13. Consider strategic diversification of partners on-the-ground. For example, advocate for the right of European trade unions and other INGOs to provide support to Workers’ Organizations in Pakistan’s textile and leather sector on trade union strengthening, labour organizing, setting up workers’ legal defense mechanism.

1. Introduction

The evaluation office of the International Labour Organization (ILO) commissioned an independent evaluation team to design and conduct a mid-term evaluation (MTE) of International Labour and Environmental Standards (ILES) application in Pakistan's Small and Medium Enterprises (SME) implemented by the ILO and World Wide Fund for Nature (WWF) and funded by the European Union (EU). This report presents the evaluation's principal findings, conclusions, and recommendations.

1.1 Context

The ILES project is funded by the EU delegation in Pakistan. The EU is Pakistan's most important trading partner, accounting for 12.8% of Pakistan's total trade in 2015 and absorbing 23.7% of Pakistan's total exports. Pakistani exports to the EU are dominated by textiles and clothing, accounting for 82% of Pakistan's total exports to the EU in 2016. Since 2014 Pakistan benefits from tariff preferences under the Generalized System of Preferences plus (GSP+) arrangement aiming to support sustainable development and good governance. To maintain GSP+, Pakistan must ratify and effectively implement 27 core international conventions on human and labour rights, environmental protection and good governance. While Pakistan has ratified international UN and other conventions including 36 ILO Conventions and various Multilateral Environment Agreements¹ (MEA), the country faces significant challenges complying with international labour and environmental standards²

The adoption of 18th Constitutional Amendment in 2010 devolved labour and environmental policy making and enforcement/implementation to the provinces. While the Ministry of Overseas Pakistanis and Human Resource Development (MOPHRD) retains the role of coordinating labour legislation implementation and managing trans-provincial issues, provincial departments of labour are responsible for labour legislation and implementation of national regulations guiding labour systems. Similarly, while the Ministry of Climate Change (MCC) coordinates environmental policy at the federal level, provincial Environmental Protection Authorities (EPA) have exclusive powers to legislate on the subjects of environmental pollution and ecology.

Pakistan's Garment and Leather Industry

Pakistan's Garments, Textile and Footwear (GTF) accounts for 57 percent of Pakistan's total exports. The sector also provides employment to about 40 percent of Pakistan's industrial workforce and contributes eight percent towards the gross domestic product. The GTF industry, although comprising many large, export-oriented enterprises, is dominated by micro and small

¹ Pakistan has signed international agreements, i.e., the UN Framework Convention on Climate Change (UNFCCC), 1994; Montreal Protocol on Ozone Depleting Substances; Basel Convention on Biological Diversity, 1994; International Convention to Combat Desertification, 1994.

² <https://ec.europa.eu/trade/policy/countries-and-regions/countries/pakistan/>

enterprises.³ Nearly 84 per cent of Pakistan's GTF workforce were employed in firms with less than six workers. Conversely, enterprises with staff of 20 or more employed less than 5 per cent of all GTF workers. In 2014/15, more than 89 per cent of all GTF jobs were concentrated in just two provinces: Punjab and Sindh and employed 2.6 million and 1.6 million men and women, respectively. In recent years, GTF exports from Pakistan have been less dynamic in comparison to key competitors in the developing Asia region.⁴

The leather sector in Pakistan is the second largest export earning sector after textiles and garments. Leather is used in footwear, clothing and furniture manufacturing. The sector contributes 5% GDP of the country and provides employment over than 500,000 people.

Compliance with labour and environmental standards in the industrial sector of Pakistan is low, leading to widespread inobservance of labour rights, poor employment conditions, increases in industrial accidents and occupational diseases, as well as compromises to the environment. The identified deficiencies ultimately result in low productivity at the enterprise level and loss of competitiveness in global markets.

Textile and leather sectors are key drivers of Pakistan's economy but are two of the most water and energy intensive, polluting sectors of the country. Low process efficiency, wastage of resources, water pollution due to discharge of untreated effluents; air emissions, excessive noise or odour; as well as workspace safety, are some of the main environmental issues associated with these sectors. These sectors also have significant impact upon Pakistan's environment, in terms of water stress, pollutants and waste management.

In 2015, men accounted for two-thirds of all GTF jobs overall, although the industry is increasingly employing a greater share of women. Despite the progress for women, the wide gender disparity (numbers employed, wages received for the same work) in GTF employment reflect Pakistan's broader challenge of low female labour participation which is driven by cultural barriers and stereotypes, a lack of safe transport and inadequate child care that is affordable, among other factors.⁵

1.2 Project Overview

ILES is a six-year (October 2016- September 2022), 11.6 million-euro project with the overall objective to promote sustainable and inclusive growth in Pakistan by supporting the country's economic integration into the global and regional economy. The EU provided 11 million euros while ILO and WWF together contributed 600 thousand euros towards project implementation.

ILES, an ILO-led partnership with WWF, aims to help ILO tripartite constituents and other stakeholders to strengthen compliance with national and international labour and environmental laws and standards to sustainably increase the country's competitiveness while

³ <https://www.fibre2fashion.com/industry-article/2192/the-pakistan-textile-industry-an-overview>

⁴ https://www.ilo.org/asia/publications/WCMS_544182/lang--en/index.htm

⁵ Ibid.

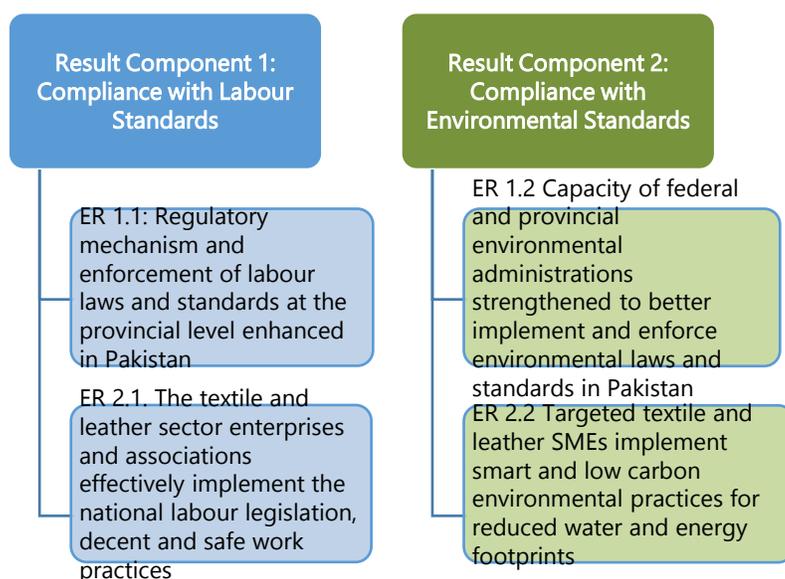
promoting inclusive development. ILES proposes to promote compliance with international labour and environmental standards through two sub- objectives:

1. To assist public sector institutions to improve the enforcement of existing legislation and compliance with international labour and environmental standards in Pakistan as well as define new laws where necessary; and
2. To assist textile and leather sector enterprises to institutionalize the implementation of, and compliance with international labour and environmental standards.

1.3 Theory of Change

In its theory of change⁶, ILES postulates that sustainable and inclusive growth in Pakistan is contingent on Pakistan's economic integration and increased competitiveness in the global and regional economies. The project designers asserted that compliance with international and national labour and environmental laws and standards contributes to competitiveness in international trade. ILES likewise puts forth that at the enterprise level, enterprises that protect workers and consumers' health and safety, uphold national and international labour and environmental laws and standards are more efficient and in the long run, more successful and able to participate in global trade.

ILES organized its results framework into two components: one focused on compliance with labour standards and the other with environmental standards. Figure 1 shows expected results under the labour and environment components:



⁶ Theory of Change is a programme design, monitoring and evaluation tool that defines long-term goals and then maps backward to identify necessary preconditions. The TOC outlines key assumptions and risks that may affect progress toward programme objectives.

The project results framework postulated that technical support to strengthen the policy environment, capacity building to implement and enforce standards as well as support for pilot interventions in selected enterprises in the textile and leather sectors will lead to compliance improvements. According to ILES' TOC, enterprise-level interventions aim to develop and document business cases for compliance with labour and environmental standards and postulate by that establishing successful business models, other enterprises will follow, increasing the number of enterprises in the target industries making efforts to improve their labour and environmental sustainability practices.

2. Evaluation Overview

2.1 Evaluation Purpose, Scope, Users and Objectives

The purpose of the evaluation is to independently assess ILES progress to date against its objectives, identify challenges and opportunities and to offer recommendations that may be useful in the remaining implementation period. The MTE considers the projects' performance during the period October 2016 (start of ILES) to approximately October 2020 (launch of MTE). The primary users of this evaluation are the ILO and WWF project implementation teams and organization hierarchies, the donor, and national stakeholders involved in strengthening Pakistan's compliance with national and international labour and environmental laws and standards. The evaluation sought to answer the key evaluation questions listed in table 1 below, which were part of the evaluation terms of reference (TOR). The full terms of reference is included in Annex A.

Table 1 Key Evaluation Questions

<i>RELEVANCE AND VALIDITY OF DESIGN</i>
<ul style="list-style-type: none"> • Is the project still relevant to beneficiaries', global, country, ILO/WWF and partner/institution needs, policies, and priorities, considering the changes in circumstances? Are there any areas or project activities that need to be modified in the second half of the project? What, if any, alternative strategies would have been more effective in achieving its objectives? • Is the revised (2018) design sound to achieve the project objective (i.e. improved compliance to labour and environmental standards)? • What must be changed to the ILES logframe, so that ILES reports results against the new SDG result framework?
<i>COHERENCE</i>
<ul style="list-style-type: none"> • To what extent did other interventions and policies support or undermine the ILES interventions, and vice versa. • To what extent did ILO and WWF capitalize on synergies and interlinkages between the ILES interventions and other interventions carried out by ILO/WWF, Government and social partners
<i>EFFECTIVENESS (INCLUDING EFFECTIVENESS OF MANAGEMENT ARRANGEMENT)</i>
<ul style="list-style-type: none"> • Which outputs have been delivered since the inception and to what extent have they had/are having impact? On whom?

<ul style="list-style-type: none"> • Is the project making sufficient progress towards its planned objectives as laid out in the project's logical framework adopted in 2018? • Will the project be likely to achieve its planned objectives upon completion? What are the main constraints, problems and areas in need of further attention? What should be done or done more by the project to promote enforcement, implementation and compliance with the ILES by public and private sector in Pakistan? • To what extent did the project link and coordinate with other initiatives and projects (including, but not limited to, Better Work Pakistan) in order to enhance effectiveness, efficiency, impact and sustainability in relation to the labour and environment objectives or both?
<i>EFFICIENCY</i>
<ul style="list-style-type: none"> • Are the financial resources and other inputs (technical expertise, staff, and time) efficiently used to achieve results? • How did the organizations harmonize and coordinate their interventions with other partners? To what extent have the project resources been leveraged with other related interventions to maximize impact, if any? • Are the human resource and time sufficient to achieve the project outcomes within the remaining timeframe? Is there a need for a project extension (cost/no cost) as a result of COVID-19 and subsequent project delays, and an exit strategy?
<i>SUSTAINABILITY</i>
<ul style="list-style-type: none"> • What strategies has the project put in place to ensure continuation of mechanisms/tools/practices provided, if the support from the ILO/WWF project ends? In what ways might the project's key partnerships contribute to sustaining its key initiatives? • How effective has the project been in establishing and fostering national/local ownership?
<i>IMPACT ORIENTATION</i>
<ul style="list-style-type: none"> • To what extent has the project contributed in promoting responsible business practices, in particular with regard to labour? • To what extent has the project contributed to improved decent work and social dialogue and addressing poor working conditions, environmental issues, and capacity challenges in the target sectors? • To what extent has the progress in the improvement of the international labour and environmental standards compliance in the private sector been made through the project interventions? • Did the project cause unintended effects?
<i>VISIBILITY</i>
<ul style="list-style-type: none"> • In what ways, if at all, has the ILES project contributed to the visibility of the EU in the country?
<i>COVID-19</i>
<ul style="list-style-type: none"> • What potential challenges does the COVID-19 pandemic pose for the implementation of the project in the immediate to medium term? • What are the specific needs and priorities of the project stakeholders and beneficiaries related to the COVID-19 outbreak? • What specific measures might the project take in light of the COVID-19 situation given the present scope of the project? In the current COVID-19 context, are there possible implementation strategies that could maximize project efforts to address challenges related to improved compliance to labour and environmental standards

2.2 Evaluation design and data collection methods

The evaluation team, composed of one International Evaluator (Team Leader), one National Consultant (Co-Evaluator), conducted the evaluation from October to December 2020. The team adapted the evaluation methodology to coronavirus pandemic-related travel and safety restrictions. All data collection was conducted remotely using online and telephone conferencing and survey technologies. The evaluators relied upon mainly qualitative data collection methods including document review, and key informant and group interviews. In addition, the team consulted the projects monitoring and evaluation and financial data and conducted two short surveys of WWF stakeholders.

The evaluation complied with ILO's evaluation norms and standards and respected ethical safeguards described in the ILO's evaluation procedures in line with the United Nations (UN) system of evaluation norms and standards as well as to the OECD/DAC Evaluation Quality Standards.

2.2.1 Sampling

The evaluators collected data on the perspectives and experiences of all key stakeholder groups involved in the project as summarized in Table 2 below.

Table 2 Evaluation Stakeholder Groups

<ul style="list-style-type: none"> - Government of Pakistan 	<ul style="list-style-type: none"> - Ministry of Overseas Pakistanis and Human Resource Development (MOPHRD) Ministry of Climate Change (MCC) - Pakistan Council of Research in Water Resources (PCRWR) (Ministry of Science and Technology) - Provincial Departments of Labour - Provincial Departments of Environmental Protection (EPAs) - Provincial Planning and Development Boards - Small and Medium Enterprises Development Authority (SMEDA) (Ministry of Industries and Production) - State Bank of Pakistan
<ul style="list-style-type: none"> - Workers' Organizations 	<ul style="list-style-type: none"> - Pakistan Workers' Federation (PWF) - Mutahida Libration Front (MLF) - Insaf Workers' Federation - Women Workers Federation
<ul style="list-style-type: none"> - Employers' Organizations and Industry Associations 	<ul style="list-style-type: none"> - Employers' Federation of Pakistan (EFP) - Industrial and trade associations from the textile and leather sectors such as: Pakistan Readymade Garments Manufacturing and Exporter Association (PRGMEA), Pakistan Hosiery Manufacturers Association (PHMA), Pakistan Tanners Association (PTA), among others
<ul style="list-style-type: none"> - Various Academic and research institutions - Textile, Garment and Leather Factory Managers and Workers 	

For key informant interviews, the team used purposeful sampling to select key informants with first-hand knowledge of the project. For discussion groups with factory management and workers, the evaluation team either used stratified random sampling (choosing factories from lists of participating factories provided by ILO, allowing the project to identify participants) or established selection criteria and allowed the project to select both the factory and the participants (WWF). For evaluation online surveys, with assistance from the WWF project management team, the evaluation team sent the online survey instrument by email to the entire stakeholder group population and created the sample based on respondents who volunteered to fill in the survey.⁷

To ensure female participation, the evaluation team requested that females involved in project implementation be included among key informants. Due to limited numbers of female counterparts, there is a sizeable gender imbalance in the list of key informants. Similarly, factory managers were almost entirely male; on the worker side, the evaluation team planned to organize both male and female discussion groups but was only able to speak with two female workers.

2.2.2 Key Informant Interviews

The evaluators interviewed 70 individuals, 12 females and 58 males from various stakeholder groups. Using open-ended questionnaires adapted to each stakeholder group, the evaluators interviewed most informants individually and, in a few cases, in small groups. They conducted stakeholder interviews in English or Urdu, depending on the needs of the informants. Table 3 below shows the distribution of key informant interviews by stakeholder group and sex.

Table 3 Key Informant Interviews distribution by stakeholder group and sex

Stakeholder Group	Total	Male	Female
ILO personnel (project team, consultants, ILO specialists, CO reps)	22	18	4
WWF personnel (project team, consultants, academic partners, CO rep)	9	9	0
Government counterparts (national and provincial)	12	11	1
Workers' Organizations	6	5	1
Employers' Organizations	11	9	2
Other Stakeholder Organizations (academics, other organizations with similar objectives, brands)	9	5	4
Donors	1	1	0
Total	70	58	12

⁷ The evaluation team used surveys to collect data from WWF intervention participants but not ILO. WWF training and other interventions reached hundreds of enterprises and other stakeholders, many of whom would likely be Internet users. On the ILO side, while it would have been useful to survey participants in OSH training project personnel indicated many were small enterprises that were unlikely to respond to an online survey.

2.3.3 Enterprise Level Stakeholder Discussion groups

The evaluation team planned to conduct discussion groups with factory level stakeholders. Due to challenges mobilizing some factory level stakeholders to participate in groups simultaneously and to ease challenges facilitating online group discussion when the participants have variable quality audio, the evaluation team converted many planned enterprise level stakeholder discussion groups to individual interviews. In total, the team interviewed 38 individuals (35 males, 3 females). Table 4 provides an overview of enterprise level key informants disaggregated by stakeholder group and sex. The interviews gathered participants' perspectives on the usefulness of the project interventions, probed for information on positive or negative outcomes, perceived challenges and views on the interventions' longer-term impact and sustainability.

Table 4 Discussion group participants disaggregated by stakeholder group and sex

Enterprise level stakeholders	Total	Male	Female
SCORE trainers	5	4	1
ILO SCORE factory enterprise managers	3	3	0
ILO SCORE factory workers	3	2	1
OSH trainers	1	1	0
ILO OSH training enterprise managers	6	6	0
ILO OSH training enterprise workers	4	3	1
WWF factory managers -SEMP/AWS	16	16	0
Total	38	35	3

2.3.4 Online Surveys

The evaluation team conducted two short online surveys to supplement qualitative information gathered through interviews with quantitative and qualitative survey data. The surveys, which were hosted online with invitations to participate sent by email, collected respondent perceptions and level of satisfaction with WWF activities and services as well as perceived outcomes and challenges affecting outcomes. They used a variety of question types: multiple choice, Likert scales, and open-ended questions. Participation was voluntary and answers were anonymous. Table 5 summarizes the number and gender distribution of survey respondents as well as estimated response rates by survey.

Table 5 Number and gender distribution of online survey respondents by survey

Survey	Total Respondents	Male	Female
ILES SEMP/AWI Enterprise	31	30	1
ILES SEMP Other Stakeholder	8	8	0
Total Respondents	39	38	1

2.2.5 Document Review

ILES managers provided an extensive selection of programme documents to the evaluation team which provided useful inputs for this report. The evaluators reviewed the following document types:

- Project documents: project proposal, work plan, M&E framework, annual reports, activity reports
- Project products: studies, manuals, and training material
- Secondary research

Annex C includes a full list of documents consulted.

2.2.6 Evaluation Debriefs

At the end of data collection, the evaluation team conducted preliminary data analysis and presented initial evaluation findings, conclusions, and recommendations to ILO and WWF stakeholders in a two-hour session on 7 December 2020. Following this initial debrief, the EVAL evaluation and project management team in consultation with the evaluation team decided that the evaluation team would present evaluation findings, conclusions and recommendations to a broader stakeholder audience following the submission and review of the draft evaluation report.

2.2.7 Evaluation Limitations

Potential bias: The evaluation team was aware of potential bias risks in data collection. These included recall (accuracy of key informant recollections including their ability to distinguish between different ILO projects), selection (potential that involvement of project personnel in the selection of evaluation key informants could lean toward selection of individuals with favourable views of the programmes) and response (potential that key informants respond in ways that they think are expected and/or will favour follow-on support). To mitigate these biases, the evaluators interviewed a wide variety of stakeholders, some selected by the evaluation team. To the extent appropriate, the team asked similar questions to all stakeholders. Instances of divergent perceptions are noted in this report. The team probed informant answers to help facilitate accurate recollection and noted when stakeholders referenced contributions from other project. Finally, the evaluators initiated all key informant interviews and the group discussion with information about the evaluation's learning objectives and key informant confidentiality protocols.

Challenges of remote data collection: The evaluation team's reliance on remote data collection imposed challenges including key informants' access to internet and comfort participating in virtual discussion groups as well as audio quality. With the help of ILO personnel, the team mitigated these risks by preparing participants, choosing technology that was accessible, which included dialling participants into discussions on regular telephone lines when necessary, and having a backup plan when one technology failed. The challenge was the greatest with workers, all of whom participated in discussion groups via their personal telephone. The team organized worker discussion groups during non-working hours and each participant was briefed in advance on what to expect. However, discussion groups were smaller than what would normally occur had face-to-face focus groups been possible. ILO/EVAL developed guidance on carrying out evaluations during the Covid-19 pandemic in March 2020.⁸

Survey representativeness: The online surveys conducted by the evaluation team were not designed to be representative of the entire population. To increase responses, the evaluation team kept the surveys relatively short and potential respondents received at least one reminder requesting participation.

3. Evaluation Findings

3.1 Relevance and Design Validity

To evaluate ILES relevance and design validity, the evaluators assessed the extent the project design is still relevant to ILO, WWF, partner institution and ultimate beneficiary needs, policies, and priorities. The evaluation team examined whether there were any intervention areas that needed to be modified in the second half of the project and if so, what, alternative strategies might be effective to reach project objectives. This section also assesses how ILES indicators relate to and could possibly feed reporting of the SDGs.

3.1.1 ILES design validity and evolution

Evolution of ILES' intervention strategy to date: Several ILO officials highlighted that the ILES intervention strategy evolved from its original design, especially the labour compliance component of the project. On the environmental side, WWF project managers indicated that ILES followed a previous EU-funded project with interventions in the textile and leather sectors. The evaluation team observed that WWF's original logframe included relatively detailed sets of interventions that answered basic questions about who, what, where, how, and how much, which facilitated a results-based management approach. On the ILO side, the intervention strategy was more broadly defined and less detailed. For example, ILO planned support for developing and reviewing acts and regulations, rules, notifications, and policies to bring them into conformity with ILS at the federal level and in Pakistan's four provinces. "ILS" is a very large and not very well-defined thematic of intervention. Moreover, the geographic targeting was large and did not

⁸ These guidelines on evaluation during the pandemic can be found here: https://www.ilo.org/wcmsp5/groups/public/---ed_mas/---eval/documents/publication/wcms_744068.pdf

have clear linkages with sector-focused enterprise level work. This lack of specificity, while allowing ILO to seize opportunities as they arose, did not focus planning, for example identifying the most relevant counterparts to be supported, or enable developing and measuring progress against output and outcome indicators that were specific. In 2017/18, the labour component underwent a lengthy strategy redefinition following an ILO-mandated evaluability assessment, which found weaknesses in the original intervention strategy including significant overlap with other ILO projects and some inconsistencies in resource allocations.

Following the assessment, ILO updated its logframe, provided more detail on enterprise level strategies⁹ and narrowed planned policy and capacity building interventions somewhat to focus on four priority topics: informality, labour protection frameworks, Occupation Safety and Health (OSH) and minimum wage setting mechanisms. In addition to the former revision, ILES's intervention strategy also evolved organically in the face of unexpected implementation opportunities and challenges.

Balance and coherence of policy and enterprise-level interventions: Evaluation key informants from nearly all stakeholder groups broadly agreed that ILES's policy reform and institutional capacity building agenda was important on both the labour and environment sides of the project. A few informants expressed the opinion that not enough emphasis had been placed on policy level interventions to date. For example, one ILO official said, *"ILES has been designed, with the mutual agreement of the EU and ILO as a big-budget, longer-term project to undertake strategic interventions – institutional developments, legislative reforms. However, the project seems more focused on enterprise level activities and less on bigger strategic reforms."* A buyers' representative likewise opined, *"I would like to see a clearer set of interventions with the government."* Several enterprise level key informants also desired more progress by ILES influencing government policies. One factory manager indicated, *"These are world- wide issues – the government should be more involved supporting industry... Globally, everyone is affected by government policy."* Various ILES commissioned studies also highlighted the importance of government-led reforms and facilitation and/or enforcement of standards.

"The scoping study strongly suggests that a systemic change can only be achieved if all relevant stakeholders pertinent to the textile and leather industry, under the facilitation of the government, agree on a mutual roadmap in order to improve the overall environmental situation in Pakistan and eventually increase the export rates pertinent to textile and leather." – WWF commissioned **Scoping Study on the European Union Standards in**

These are world- wide issues – the government should be more involved supporting industry... Globally, everyone is affected by government policy." Various ILES commissioned studies also highlighted the importance of government-led reforms and facilitation and/or enforcement of standards.

everyone is affected by government policy." Various ILES commissioned studies also highlighted the importance of government-led reforms and facilitation and/or enforcement of standards.

Despite relatively broad agreement on the importance of policy and capacity building interventions, there was little consensus on where ILES should focus, especially within the labour component. Under the umbrella of "compliance," stakeholders identified a gamut of high priority policy level and institutional capacity building related needs, many that could be the focus of a standalone project. Stakeholders suggested ILES work in fairly disparate areas including: broad legislative reforms, labour and environmental inspection strengthening, social

⁹ ILO/ILES outlined its enterprise level strategy in detail. It planned three main sets of activities – to provide OSH training to at least 100 enterprises, to pilot Sustaining Competitive and Responsible Enterprises (SCORE), an ILO global programme designed to improve productivity and working conditions in SMEs, in 50 enterprises and to design and pilot a new, customized productivity programme in 25 enterprises.

protection expansion to home-based workers, improved minimum wage setting mechanisms and enforcement, promoting gender equity and female workforce participation, trade union capacity building, promoting Freedom of Association and Collective Bargaining (FOACB), improving Labour Dispute Resolution (LDR) mechanisms, reinforcing industry focused production-oriented research and development, and providing emergency Covid-19 assistance to unemployed workers, among others.

Enterprise targeting: Representatives from most stakeholder groups validated the project's original focus on small and medium-sized enterprises (SMEs), noting that larger, export-oriented enterprises were more likely to have better compliance with labour and environmental standards than their small and medium-sized counterparts and therefore were in greater need of assistance. However, following 2018 project revisions and an EU Results Oriented Monitoring (ROM) mission, ILES project management indicated that they re-evaluated enterprise targeting criteria taking into consideration challenges identifying formally registered, stable SMEs in the target sectors as well as opportunities to provide needed support to larger enterprises.

ILES enterprise level interventions to date appear to include many large, export-oriented textile and leather enterprises which would not qualify as SMEs. This is not easily verified since the project does not clearly define the term SME or systematically report data on the size (number of employees, turn-over) of enterprises participating in its interventions. ILO reported that its OSH training interventions reached enterprises of all sizes "from 10 to 3000 employees" while its Sustaining Competitive and Responsible Enterprises (SCORE) activity targeted units within mainly larger enterprises (400-2000 employees). ILES management highlighted that almost all exporting enterprises are larger scale because most SMEs fail the audit criteria for brands/retailers. According to one ILES manager enrolling SMEs was problematic because many operate illegally and are not registered for tax/do not register workers. In addition, programme managers perceived that smaller companies were not able to make the commitment required to engage in programmes like SCORE, since they had an unstable workforce. WWF-SEMPs programme interventions targeted 50 non progressive and 25 progressive enterprises which, while not assessing enterprise size per se, did distinguish between enterprises with strong and weak compliance records and focused relatively more on the latter. An internal WWF evaluation noted it need to refine its definitions of progressive and non-progressive and do more to ensure they were consistently applied.

Sector focus: ILES maintained its sector focus overall. Project management affirmed the sectoral focus, which was justified in the project document as follows, *"The textile and leather sectors are two of the most labour, water and energy intensive, polluting, and energy consuming sectors in Pakistan."* Within its targeting strategy, WWF focused in on industry segments known to be the most water resource consuming and polluting: wet processing in textile and tanneries

Many smaller-size, non-exporting enterprises have financial constraints, and do not comply with environmental standards. -Academic Institution Representative

Nearly 84 per cent of the Garment, Textile and Footwear workforce were employed in firms with less than six workers. Conversely, enterprises with staff of 20 or more employed less than 5 per cent of all workers. Unsurprisingly, a vast majority of these small firms were operated by an individual owner and were not registered as a private limited company - ILO Asia-

in the leather sector. For its part, ILO focused more on the labour-intensive readymade garment segment of the textile sector and, to date, has not yet worked with any leather enterprises, a gap cited by a few evaluation respondents.¹⁰ ILES project managers noted that ILO and WWF's focus on different industry segments, made it more difficult for them to work in the same factories, although they still managed to overlap in about a dozen enterprises, based on project manager reports. ILO extended its OSH training activity to the marble sector in Peshawar, Khyber Pakhtunkhwa (KPK) province in response to request from provincial labour officials. This diverged both from the project's sectoral focus and geographic targeting for enterprise level interventions.

Geographic focus: Geographically, ILES planned country-wide policy and capacity building interventions while concentrating its enterprise level work in two provinces: Sindh and Punjab. Country-wide policy interventions included work at the federal level and in Pakistan's four provinces, the latter taking into consideration the devolution of labour and environment policy to provincial authorities.

In 2014/15, more than 89 per cent of all Garment, Textile and Footwear jobs were concentrated in just two provinces: Punjab and Sindh, which employed 2.6 million and 1.6 million women and men, respectively - ILO Asia-Pacific Garment and Footwear Sector Research Note Issue 7, February 2017

After ILES' 2018 strategy update and based on a large, similarly focused Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) project's presence in Punjab, ILES concentrated enterprise-level labour compliance interventions in Sindh province. WWF continued planned environmental compliance enterprise level work in both provinces, with activities concentrated in and around four major cities: Faisalabad, Sialkot and Lahore in Punjab and Karachi in Sindh. As of the midterm evaluation, both ILO and WWF policy level interventions have been concentrated in Sindh, where project managers reported demand for project support was greater. Nevertheless, ILES reported plans to undertake more labour policy/enabling environment activities in KPK and Baluchistan in the latter half of the project. It is currently outside WWF's scope to intervene outside Sindh and Punjab. WWF management reported it had received requests for assistance from stakeholders in KPK and Baluchistan and that it would like to conduct baseline studies and other data collection in order to develop an "atlas" of the textile and leather sector, comparing water use standards and practices across all four provinces.

While limiting ILO enterprise level interventions to Sindh was acknowledged by several key stakeholders as a wise decision which avoided unnecessarily duplicating GIZ efforts, several ILO officials and ILO constituents noted that ILO's traditional Workers' and Employers' organization partners had fewer members in the garment and leather sectors. An unintended consequence of the project's sectoral focus was tension between the ILO and the ILES project and its main constituents, who initially objected strongly to ILO working with other Employers

¹⁰ According to both ILO and industry level officials, ILES faced push back from leather industry stakeholders in Sialkot, who remember negative international attention associated with ILO interventions in the football and surgical instrument making industries there.

and Workers' Organizations and later, after ILO Employers' and Workers' Specialists intervened, agreed to ILES working with other organizations but only after consulting with them first.

Gender focus: Stakeholders from all stakeholder categories broadly agreed that ILES' initial design did not have a significant gender focus and had not been adapted in any major ways to identify and address specific labour and environmental issues affecting women since the initial design phase. One ILO manager said, *"I think there is room for improvement there. Not just this project but others and not just at the policy level but also at the enterprise level.... A proper gender mainstreaming assessment might be needed."* WWF personnel noted challenges intervening on the enterprise level to benefit women because there were few women workers in the industry segments it targeted.

Men accounted for two-thirds of all garment, textile and footwear jobs overall, although the industry is increasingly employing a greater share of women. Average annual employment growth for women (10 per cent) outpaced that of men (4.3 per cent) during that four-year period. [2010/11 to 2014/14] - ILO Asia-Pacific Garment and Footwear Sector Research Note

ILO personnel indicated they endeavoured to involve women in project activities when possible, although the evaluation team notes that neither ILO nor WWF provided sex-disaggregated data on training participants in ILES' annual report. ILO personnel likewise noted that in general, fewer women were employed in Pakistan's garment sector than in other Asian countries, although recent ILO research highlighted a rise.¹¹ Within the SCORE methodology, SCORE trainers highlighted, and progress reports corroborated that ILES encouraged female participation on enterprise improvement committees and the committees were encouraged to develop factory improvement projects that addressed female workers' specific needs. In addition, ILO planned interventions related to home-based workers, which if implemented would touch an industry segment with high female participation rates and significant reported labour rights abuses.

Evaluation key informants highlighted various gender issues that the project might address. These included efforts to close the gender-based pay gap, sexual harassment prevention and grievance handling, encouraging female trade union leaders, facilitating female-oriented apprenticeship and vocational training programmes, and facilitating networking among female engineers and compliance officers, among others.

Covid-19 and project response: Evaluation key informants from all stakeholder groups reported the coronavirus pandemic's effects on project stakeholders as initially severe but was lessening over time as parts of the textile and leather sectors were able to restart production. Government and worker representatives cited need for donor assistance to support public and other efforts to help un and underemployed workers. Worker representatives also highlighted the need to help workers recover unpaid wages. Employers highlighted that they needed assistance to recover from their losses stemming from lost orders and production cost increases.

¹¹ https://www.ilo.org/asia/publications/WCMS_544182/lang--en/index.htm

The effects of the pandemic on project interventions have been various. Several project stakeholders concurred, *“Covid broke the momentum of the programme which was very unfortunate.”* Several stakeholders involved in SCORE implementation highlighted that the programme has struggled to restart following the gap in SCORE trainers’ face-to-face activities. In addition, project managers perceived that some beneficiary needs and priorities have shifted away from ILES objectives. For example, project managers as well as enterprise level respondents suggested some beneficiary factories were “struggling for survival” and were therefore less interested in making immediate investments in factory upgrades to increase water and energy efficiency or invest in workplace cooperation projects. Representatives of larger factories also highlighted post pandemic opportunities, namely that some investors had begun to shift orders from China to Pakistan (as well as other garment-producing countries).

ILES has adapted its intervention strategy in a few ways to address new needs and overcome the negative effects of Covid-19 on the programme:

- ILO/ILES developed awareness raising material to help provincial labour officials and factory level beneficiaries apply the Covid-19 related Standard Operating Procedures (SOPs) and commissioned an assessment on the impact of the pandemic on workers’ rights and well-being, presumably to guide future interventions.
- SCORE personnel are assessing and developing content to address enterprises “post-pandemic” needs.
- Both ILO and WWF have increased use of online conferencing technology and have organized some online events. ILES has consulted with SCORE Global managers to identify online strategies from elsewhere that have been used to enable activities to continue during the pandemic. An WWF project manager reported that although their partners found it initially challenging to use “Zoom” and other tools adopted by the project, some online events have been able to reach larger numbers of participants than previous in-person events.

3.1.2 ILES alignment with key national stakeholders’ needs, priorities, policies and plans

ILES alignment with tripartite and GOP policies and strategic plans: ILES aligns with Pakistan’s Decent Work Country Programme (DWCP) which was developed by ILO’s tripartite constituents in Pakistan and covers the period 2016–2020. ILES features intervention strategies with potential contributions to two of the DWCP’s four priorities: priority two, “promoting job creation for youth and vulnerable groups” and priority three “promoting compliance with International Labour Standards through social dialogue.” Priority two seeks to augment decent employment opportunities, especially for youth and women while priority three aims for better compliance with labour standards, stronger Workers’ and Employers’ organizations and legislative reform in line with International Labour Standards (ILS). According to ILO, the DWCP is aligned to the country’s Vision 2025, national economic policies, as well as provincial development plans.

ILES, with its focus on increasing the competitiveness of Pakistan’s textile and leather sector, complements the GOP’s 2020–25 textile policy which aims to facilitate achieving \$25.3 billion in

exports by 2025 by boosting cotton production, extending various production-oriented credit facilities, tax and tariff incentives, subsidizing energy, and creating specialized economic zones.¹²

In addition, ILES' environmental component contributes to meeting one of the current government's goals to increase awareness of environmental management issues. Clean Green Pakistan (CGP) is a five-year campaign initiated by the Prime Minister to promote improved practices in five areas: plantation, solid waste management, liquid waste management/ hygiene, total sanitation, and safe drinking water.¹³

Key stakeholders perceptions of the extent ILES' aligns with their priorities and needs: ILES' specific objectives to strengthen industry compliance with core labour standards and improve workplace safety as well to reduce its negative environmental footprint were perceived and weighed differently by different stakeholder groups but were nevertheless generally validated as important concerns.

Government respondents at both the Federal and Provincial level expressed general satisfaction with the ILES support to date while also indicating they had and still expected more from ILES.

- A MOPHRD government representative expressed satisfaction with project support to improve Pakistan's labour reporting as well as its assistance meeting a long outstanding ILO member state obligation to submit International Labour Conference (ILC) instruments to the national competent authority.¹⁴ The official also highlighted that various studies undertaken by the ILO (through ILES as well as other projects) had been useful to guide policy reform efforts, including strengthening legal frameworks. Although informed of project activities at the provincial levels and with social partners, the federal government representative requested more and more timely communication from the ILO, *"Most of the time ILO doesn't inform us and if we are informed, it is at the 11th hour when no fruitful input can be provided. We would also like to be informed about the result of the activities including how many have benefited."*
- On the environment side, a MCC representative highlighted ILES progress in many high priority areas: mobilizing the private sector, conducting studies, work on green financing, and provincial level EPA personnel training. The same official however indicated the Ministry's expectations for support for Pakistan's Multinational Environment Agreements (MEAs) reporting requirements were still largely unmet.

¹² <https://www.thenews.com.pk/print/628968-textile-policy-2020-25-pm-approves-in-principle-textile-export-target-of-28b-in-five-years>

¹³ <https://cleangreen.gov.pk/>

¹⁴ Under Article 19 of the ILO Constitution, member states are required to submit all Instruments adopted by the International Labour Conference (ILC) to the relevant competent authority. At the ILC held in 2016 and 2017, the Committee on the Application of Standards noted with concern the serious failure of Pakistan to submit ILO Instruments to the Competent Authority (Pakistan is among 38 countries who are in situation of "serious failure to submit"). The Committee therefore requested that Pakistan's government complete the procedure in order to be in a position to submit to the Competent Authority the 39 pending Instruments adopted by the ILC in the 18 sessions held between 1994 and 2015

- At the provincial government level, departments of labour and of environmental protection representatives highlighted that ILES had provided useful assistance to improve provincial legal and policy frameworks while requesting additional training and material support for their respective inspection services. For example, EPA officials highlighted specific needs to upgrade their laboratory equipment to enable more effective environmental compliance monitoring.
- ILES interventions in collaboration with GoP entities with business facilitation mandates such as the Ministry of Commerce or SMEDA has been limited. The most significant interaction to date has been between WWF and the State Bank of Pakistan in the context of developing green financing guidelines.

Employers' Organizations, which include industry associations, have been actively involved in ILES interventions and were largely happy with the support they have received to date. WWF collaborated with eight industrial associations in the leather and textile sector to organize member training and awareness raising activities while ILO's direct engagement has mainly been with the EFP. WWF signed Memorandums of Understanding (MOU) with five industrial associations, all of which shared their member data base with the organization to facilitate member involvement in project activities.

We design our audits based on international standards as well as local standards. The associations appreciated that. They know there is a dire need to assist industry -WWF personnel

- EFP reported wide-ranging interactions with the ILO/ILES on topics including OSH, FOACB, and LDR. A federation representative affirmed the EFP's commitment to ongoing collaboration, *"I think we are already consulting with the project at the national level on a variety of issues. This process shall continue with enthusiasm."*
- Industry association online survey respondents rated WWF/ILES assistance promoting improved smart environmental management practices to be excellent (1), very good (3), or satisfactory (1) (5 respondents total). One association member said, *"WWF are professional people. Our members are satisfied with them. They have helped them to achieve better results."*
- Employers' organization representatives expressed strong satisfaction with the project's focus on increasing enterprise efficiency/productivity and hoped for continued assistance. However, EFP voiced strong concerns that their role in sustaining ILO enterprise level support programmes be reinforced.
- Among needs voiced by industry representatives were getting support from the government on productivity improvements, moving public authorities from a primarily punitive actions to support for "correction action", access to grants or soft loans for environment related upgrades, and assistance raising members' awareness and providing technical inputs on how to meet labour and environmental compliance standards.

Workers' Organizations representatives were included in only a few ILO enterprise training activities within the ILES labour component and not at all in the environmental component, a situation nearly all Workers' representatives consulted by the evaluation team noted with

disappointment. One Workers' Organization leader indicated *"There have been very few activities with Pakistan Workers' Federation (PWF) directly. They aligned with our priorities a little bit."*

- Workers' organization representatives identified a number of policy and capacity building high priority needs: development of trade unions' organizing capacity, reinforcement of trade unions' ability to defend members before the labour tribunals, help resolving longstanding issues surrounding FOACB that have been raised by Pakistani workers' organizations before the ILO Committee of Experts on the Application of ILO Conventions and Recommendations (CEACR), and strengthening labour inspection. One leader highlighted that valuable support from developed country trade unions and their international cooperation wings had been restricted by the GOP in recent years.
- At the enterprise level, Workers' Organization representatives cited a variety of high priority concerns related to enterprise compliance with labour laws. These included: registration of "fake" unions, employers' union-busting activities, extensive use of non-contractual labour, non-registration of workers for old-age and social security benefits, non-compliance with minimum wage law, illegal sub-contracting to home-based workers, and unsafe working conditions.
- Evaluation document review including drafts of ILES commissioned studies on non-standard forms of work in Sindh, FOACB and LDR mechanisms as well as reports¹⁵ by international non-governmental organization (NGOs) such as Human Right Watch, SOMO and the Clean Clothes Campaign which corroborated Workers' Organizations' concerns about poor working conditions and poor environmental practices in segments of the textile and leather sectors.
- Discussion with Workers' representatives highlighted tensions among their organizations, with some parts advocating that ILO take a more inclusive approach to its collaboration with Workers' Organizations and labour focused NGOs. One trade union leader asserted, *"ILO is not property of any one trade union- ILO is for all of us. ILO should take all progressive trade unions on-board working in the province."*

Factory managers mainly provided positive feedback regarding the assistance they received from ILES, both the labour and environment components but highlighted many issues affecting their business for which they would like project's support to address.

¹⁵ For example, SOMO's report on labour rights abuses in the leather sector <https://www.somo.nl/nl/wp-content/uploads/sites/2/2016/12/Hell-bent-for-leather-web.pdf> Pilier and Clean Clothes report on workplace safety in the textile sector <https://laborrights.org/publications/pakistans-garment-workers-need-safety-accord>

- Based on key informant interviews, beneficiary factory personnel perceived ILES trainers and auditors to be competent and their advice useful. For example, one factory manager said of WWF commissioned auditors, *“The audit team is well-educated and well-equipped. We would have liked the audit [of environmental practices] to cover the whole factory.”* Twenty-seven out of 31 enterprise online survey respondents rated ILES/WWF assistance excellent (19) or very good (eight) and the remainder said it was satisfactory. Likewise, based on the survey, the project’s provision of technical expertise and recommendations responded to key challenges impeding their adoption of improved environmental management practices (see box). Similarly, ILES/ILO SCORE programme factory managers expressed satisfaction with the SCORE trainers, while noting the arrival of Covid-19 negatively affected activities. One manager said, *“when the situation was normal, the quality of training delivered and the way the team handled implementation was good.”* While noting that the ILO OSH training was limited in scope, participating factory managers likewise provided largely positive feedback. For example, one manager affirmed, *“the OSH training was useful and informative.”*
- A few enterprise level stakeholders highlighted that more frequent contacts with experts, including experts with specific, industry-related technical specialities, would increase the value of project assistance. For example, one OSH training management discussion group participant said, *“A technical person (relevant to the industry visited) should be included in the OSH monitoring team in order to provide technical assistance including practical demonstrations.”* One WWF study author, a senior supply chain sustainability expert, likewise affirmed the value of hands-on support from specialists, *“They [factory managers] are looking for a helping a hand. The need more support and understanding and a process enabling continuous improvement, not just ‘comply or else’.”*
- At the enterprise level, factory managers highlighted a variety of needs that they hoped ILES would address through future assistance: help identifying and implementing new practices and technologies to conserve resources and reduce pollution, better access to business financing, facilitation of networking and good practice sharing among enterprises as well as better access to policy makers and improvements in government assistance programmes.

According to evaluation online factory manager survey (31 respondents total), the most frequently cited challenges to improving their environmental management practices were:

- Lack of access to financing for needed improvements (18 respondents)
- Lack of technical expertise to implement changes (18 respondents)
- Lack of knowledge regarding what can be done (10 respondents)
- Lack of cooperation from production personnel (9 respondents)

Workers: ILES engaged workers within its labour component SCORE and OSH training interventions. According to ILO’s OSH specialist, who led OSH training, after initially organizing training in hotels, ILES opted to organized shorter training sessions with target factories to facilitate greater worker participation. Based on the small number of workers interviewed by the evaluation team (three), workers appreciated the opportunity to participate in enterprise improvement activities. Two workers highlighted their appreciation for SCORE’s mixed management/worker enterprise improvement committee, which regularly organized short (10

minute) meetings. They indicated these meetings, however short, helped to close the communication gap between workers and management.

3.1.3 ILES design alignment with global sustainable development and supply chain frameworks

Evaluation team document review suggests ways ILES aligned with key international and regional agendas on decent work as well as GOP policies and strategic plans.

ILES design linkages with the Sustainable Development Goals (SDGs): ILES aims to contribute towards the UN SDGs, especially goal 6 on sustainable water management and goal 8, which aims for decent work for all. Table 6 shows areas ILES reporting may feed contribute data to report on SDG indicators under these two goals.

Table 6 How ILES results framework links with the UN SDGs

SDG Goal	Related SDG targets and indicators	Relevant ILES Logframe indicators
Goal 6 Ensure availability and sustainable management of water and sanitation for all	6.3: By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally - Indicator 6.3.1 Proportion of wastewater safely treated 6.5: By 2030, implement integrated water resources management at all levels, including through transboundary cooperation as appropriate - Indicator 6.5.1 Degree of integrated water resources management implementation 6.4: By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity - Indicator 6.4.1 Change in water-use efficiency over time	Expected Result 1.2: Capacity of Federal and Provincial environmental administrations strengthened to better implement and enforce environmental laws and standards in Pakistan Indicators 1 & 2: -Number of Standard Operating Procedures developed and adopted by EPAs -Level of endorsement by EPAs on the developed policy recommendations for further actions. Expected Result 2.2: Targeted textile and leather SMEs implement smart and low carbon environmental practices for reduced water and energy products. Indicators 1 & 2: -Percentage improvement in the environmental performance by the enterprises.
Goal 8 Sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.	8.2: Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors Indicator 8.2.1 Annual growth rate of real GDP per employed person 8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment - Indicator 8.8.2 Increase in national compliance of labour rights (freedom of association and collective bargaining) based on International Labour Organization (ILO) textual	Overall Objective To promote sustainable and inclusive growth in Pakistan by supporting the economic integration of Pakistan into the global and regional economy through improved compliance with labour and environmental standards and increased competitiveness Indicator 1 & 2: -Level of compliance of national Laws with International Labour and Environmental Standards -Degree of target sectors' contribution to country's GDP Expected Result 1.1: Regulatory mechanism and enforcement of labour laws and standards at the provincial level enhanced in Pakistan Indicators 1-4:

	sources and national legislation, by sex and migrant status	<ul style="list-style-type: none"> - Degree of alignment between national labour laws and ILS -Degree of labour administration capacity to implement and enforce national labour laws -Level of effective involvement of social partners in -federal and provincial tripartite structures Level of capacity of workers organizations to advocate for workers' rights and participate in CB
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3.2 Coherence

In this section, the evaluation team examines ILES' internal coherence as well as if/how the project fits with other ongoing ILO and WWF activities. The evaluation team likewise reviews the extent project actions were coordinated with other Pakistan development partners' initiatives to build synergies and avoid duplication of efforts with its interventions.

3.2.1 ILES interlinkages between the labour and environment components and with other ILO and WWF projects

Coherence between labour and environment components: According to several ILO and WWF officials consulted by the evaluation team, the labour and environmental components of ILES were designed separately with their own internal logic and later joined under one, ILO-led partnership. Project funding was divided roughly in equal parts across the two partners. The ILO and WWF teams operated from different offices in different cities in Pakistan.

Possibly because of the separate design processes, few, if any joint ILO/WWF initiatives were initially planned. As previously highlighted, targeting the same factories likewise proved challenging since ILO and WWF tended to work on different industry segments. Nevertheless, the project teams reported some, although limited cooperation on project implementation.

- ILO integrated a presentation on “clean production” delivered by WWF in its SCORE training package.
- WWF facilitated ILO to enroll enterprises in its OSH and SCORE programmes, capitalizing on WWF's strong relationship with industry associations. Similarly, ILO reported providing guidance and support to WWF on its policy level outreach, especially at the federal level.

At the time of the midterm evaluation (November 2020), the two project teams reported frequent information sharing as well as plans for future collaboration on the new productivity programme ILO plans to develop and pilot in 25 enterprises starting in 2021.

Coherence of ILO and WWF project portfolios in Pakistan: ILES was one of 34 ILO projects with activities in Pakistan from 2016 to the present. These projects had a total budget of approximately 21 million United States Dollars (USD), according to the ILO's online Development Cooperation Dashboard.¹⁶ ILES' expenditures to date (the labour and environment components taken

¹⁶ <https://www.ilo.org/DevelopmentCooperationDashboard/#a7ciiuz>

together) represents about 40 percent of ILO's total development cooperation expenditures making ILES the largest project in the organization's country portfolio.

Within the ILO global strategic planning framework, the project mainly contributes to three ILO 2020-21 Programme and Budget (P&B) outcomes:

- Outcome Two: International labour standards and authoritative and effective supervision
- Outcome Four: Sustainable enterprises as generators of employment and promoters of innovation decent work
- Outcome Seven: Adequate and effective protection at work for all.

In the previous biennium, ILES also contributed to Outcome Two and Four: Ratification and application of international labour standards and sustainable enterprises. OSH activities likewise contributed to Outcome seven: Promoting safe work and workplace compliance including in global supply chains.

Several EU-funded as well as other-donor funded projects¹⁷ within ILO Pakistan's project portfolio, like ILES, focused specifically on the textile and leather value chain and/or were designed directly or indirectly to support Pakistan to uphold its GSP+ obligations. Annex D contains a list of other EU-funded ILO Pakistan projects during the period 2016-2020.

Based on its website, WWF intervenes in seven practice areas (freshwater, wildlife, oceans, forests, climate and energy, food and markets). ILES falls within WWF's freshwater interventions in the thematic area "water stewardship." In addition to ILES, WWF collaborates with a few international garment brands such as Levis, H&M, and Next on water stewardship activities. Outside its activities on water, WWF is carrying out related initiatives on climate resilient crop production, on-farm water stewardship, and sustainable energy solutions.

Both ILO and WWF intervene to improve labour and environmental practices in both in cotton growing and textile industries. This value chain focus is very relevant in Pakistan, which is the world's fourth largest cotton producer and holds the third largest spinning capacity in Asia.¹⁸ Much of the cotton sourced by Pakistan's textile industry, both by the export and domestic market segments, is grown locally. Although believed to be largely absent in the export-oriented textile industry, child labour and forced labour are both found in the cotton supply chain across in Pakistan.¹⁹ Moreover, cotton growing is water intensive²⁰ and chemicals used in its production are a source of water pollution.

According to ILO Country Office officials, ILES was not designed to directly support the GOP to uphold its GSP+ obligations but highlighted that its intervention strategies complement another ongoing project funded by DG Trade which is directly focused on GSP+. The latter project like

¹⁷ The EU was the ILO largest donor in Pakistan, with contributions representing approximately 35 percent of the total budget allocation for the period.

¹⁸ <https://bettercotton.org/where-is-better-cotton-grown/pakistan/>

¹⁹ https://www.ilo.org/islamabad/whatwedo/projects/WCMS_648369/lang--en/index.htm

²⁰ For example, according to WWF, it takes more than 20,000 litres of water to produce just one kilogram (2.2 pounds) of cotton, which roughly equals one T-shirt and a pair of jeans. <https://www.worldwildlife.org/stories/the-impact-of-a-cotton-t-shirt>

ILES, features support for both provincial and federal level policy and legal framework reforms and capacity building for ILO's tripartite constituents in line with upholding International Labour Standards.

ILES is currently the only ILO project with significant work at the enterprise level. This may soon change with the potential arrival of Better Work Pakistan.²¹ Better Work, one of the ILO flagship global programmes, aims to improve working conditions in the garment industry and make the sector more competitive. It is currently active in nine countries and in over 1700 factories.²² The programme aims to improve compliance with national and international labour laws and standards in its member factories through its factory services package²³ In addition, Better Work aims to engage industry stakeholders such as industry associations, brands and buyers to support responsible business practices.

Coordination between ILES and other ILO Pakistan projects: Within the ILO country programme, ILO project managers reported collaborating and coordinating with in variety of ways.

- According to one ILES manager and documented in the project's evaluability assessment report, the project's 2018 logframe revision aimed to focus policy and capacity building interventions on topics and geographic areas not covered by other ongoing ILO projects.
- ILES replicated a previous project's support for developing a provincial "labour protection framework" in three additional provinces. It also maintained support for the Pakistan Buyers' Forum and planned to build on work related to minimum wage setting mechanisms started by a previous project.
- ILO project managers reported co-funding some consultations by international consultants (with related but different deliverables produced to avoid double reporting) on FOACB and labour dispute resolution.
- ILES and Better Work managers reported that ILES, as well as the GSP+ project are helping Better Work to begin addressing risks that may affect the future efficacy of the programme, including understanding Pakistan's legal and enforcement issues that negatively affect the exercise of FOACB and labour dispute resolution mechanisms.
- Although both ILES and Better Work Pakistan may soon be operating concurrently at the enterprise level in the same sector, ILO officials agreed that ILES' and Better Work took different but largely complementary approaches. ILES and Better Work managers cited ILO's integrated programme on compliance in the textile sector in Ethiopia where SCORE and Better Work Ethiopia have functioned productively, in some cases within the same enterprises.

²¹ According to ILO officials, at the request of the GOP, BW has been exploring opening a programme in Pakistan since 2017 and following various feasibility studies and fundraising, expects to make a final decision regarding opening a pilot programme in the coming months.

²² <https://betterwork.org/>

²³ According to its website, BW factory services include: guided self-diagnosis to support factories to identify issues and priorities within their factory, establishment of a bipartite worker management committee to improve workplace communication and cooperation, learning services – advisory services, industry seminars and training courses and external assessment.

ILES synergies and coordination with other international development and finance organizations: Based on information collected during the evaluation data collection period, there are limited number of projects/initiatives with objectives like ILES currently being implemented in Pakistan by development partners other than ILO and WWF.

On the labour side, GIZ is currently winding down implementation of the 2017-2020 “Improving labour standards in Pakistan’s textile industry.” This project was preceded by a similar project which was implemented from 2014-2016 and will be followed by another project, which is scheduled to begin in 2021. The GIZ projects have intervened almost exclusively in Punjab province. Like ILES, the projects intervened with provincial level government and business organizations to strengthen the policy and enabling environment as well as at the enterprise level on productivity and compliance focused improvements. ILES and GIZ project managers reported strong coordination of their activities as well as good practice and lessons learned sharing. Examples of coordination included avoiding geographic overlap, sharing lists of factories, and scheduling significant events to avoid conflicts. ILES project management reported taking the time to learn from GIZ as one of the successes of the project.

On the environment side, according to WWF and government officials, in 2018 the World Bank allocated USD 273 million for the five-year Punjab Green Development Programme for Pakistan to strengthen environmental governance and promote green investments in Punjab (it is now extended to 2025). According to a Punjab government official overseeing the programme, WWF and provincial authorities have discussed areas of collaboration including upgrading the legal framework, developing specific environmental standards for the leather and textile industries, and strengthening reporting on private sector initiatives to improve compliance with international treaties and agreements. WWF project managers reported that to date, actual collaboration has been limited largely because of the World Bank programme’s slow start.

Through a Memorandum of Understanding (MOU) signed with the UN Industrial Development Organization (UNIDO) leather group, WWF has also collaborated with the Sialkot Leather Tannery zone initiative, a public private partnership to move the city’s leather tanneries from residential areas scattered throughout the city centre to a specially designated zone outside the city.

3.3 Implementation progress, effectiveness, impact orientation, and sustainability

This section includes an overview ILES implementation strategy for each of its immediate outcomes, highlights results achieved to date, shares stakeholder feedback and other data on project outputs and outcomes and discusses the challenges and opportunities that affected project implementation. In addition, this section examines the extent and ways ILES is taking appropriate steps to foster sustainability.

3.3.1 Labour component progress, achievements and impact orientation

Result 1.1 Regulatory mechanisms and enforcement of labour laws and standards at the provincial level enhanced

As of the end of September 2020, the project had exceeded, achieved or nearly achieved most of its project monitoring plan (PMP) indicator targets related to legislative and policy

frameworks strengthening (output 1.1.1) but had recorded relatively less activity and missed several targets under the other three outputs.

Of the four planned policy areas on which ILES planned to work, relatively little has been done on the issues of informality and wage-setting mechanisms. ILES planned an activity for wage setting boards in year four that have now been postponed until year five due to pandemic related travel restrictions that prevented the wage specialist from the ILO Delhi office from traveling to Pakistan. Other gaps cited by evaluation respondents included limited follow-up on policy initiatives as well as limited capacity building for federal and provincial labour departments to implement and/or enforce labour legislation. Planned training activities for Workers' Organizations and Provincial Tripartite Committee/Council members have also been delayed, although representatives of the latter have participated in other project sponsored consultations and training activities. Table 7 shows key achievements under each output, with additional detail provided on some key achievements below.

TABLE 7. ILES ACHIEVEMENTS LABOUR COMPONENT: POLICY AND CAPACITY BUILDING

SPECIFIC OBJECTIVE 1: PUBLIC-SECTOR INSTITUTIONS IMPROVE THE ENFORCEMENT OF EXISTING LEGISLATION AND COMPLIANCE WITH INTERNATIONAL LABOUR AND ENVIRONMENTAL STANDARDS IN PAKISTAN AS WELL AS DEFINE NEW LAWS WHERE NECESSARY

Result/Outputs	ACHIEVEMENTS
RESULT 1.1 Regulatory mechanism and enforcement of labour laws and standards at the provincial level enhanced in Pakistan	<ul style="list-style-type: none"> – No data available on achievements against result/outcome indicators
Output 1.1.1 Legislative and policy frameworks drafted and reviewed with involvement of government, workers and employers to better comply with ILS	<ul style="list-style-type: none"> – Implementation rules drafted for 11 Sindh labour laws and submitted to the government – 3 Labour protection frameworks drafted, 2 adopted, 1 in-progress – Support provided to MOPHRD reporting obligations, submission of pending instruments – Support for federal and provincial governments to develop strategies for improving OSH legislative frameworks and implementation
Output 1.1.2 Federal and provincial labour departments supported for effective implementation and enforcement of labour laws and standards	<ul style="list-style-type: none"> – Support for annual OSH day celebrations – Covid-19 awareness raising material developed and disseminated
Output 1.1.3 Workers representatives are better equipped to advocate for workers' rights	<ul style="list-style-type: none"> – OSH manual for workers in-progress
Output 1.1.4 Tripartite structures' capacities strengthened to improve the legislative and policy frameworks and their	<ul style="list-style-type: none"> – 32 Federal and Provincial Tripartite Committee members (and others) consulted and trained on OSH ILS – Studies on Freedom of Association and Collective Bargaining & Labour Dispute Resolution

implementation through
social dialogue

– Issue paper on non-standards forms of work in Sindh

Sindh labour law implementation rules: ILES and another ILO project jointly contributed inputs that resulted in the Sindh provincial government developing implementation rules for 11 labour laws²⁴. ILES supported tripartite plus consultations and an ILO International Labour Standards specialist supported drafting sessions. One project manager opined, *“I think drafting the business rules was an achievement. Without rules it is very difficult to interpret and implement laws.”* While affirming the value of the rules, one provincial labour official added, *“It is not enough. There is a need to develop standards, guidelines and codes of conduct. That is much more difficult than drafting the law and the rules.”*

Support for MOPHRD submission of pending instruments and reporting obligations: The GOP was in breach of its obligations under the ILO constitution to consider and review 39 ILS instruments. The main aim of requiring member states to review and submit the instruments to relevant authorities is to promote implementation of ILO Conventions and Recommendations. In 2017/18 (year 2), ILES supported the MOPHRD to review the 39 outstanding instruments. ILO support included engaging the ILO regional ILS specialist and a national consultant to develop an analytical report and facilitating a tripartite plus national consultation event. Based on ILO reports, Pakistan’s Prime Minister included the analytical report on the agenda of the Federal Cabinet for its consideration but it has not yet been submitted to Competent Authority/-ies. According to a government official, the federal government decided it would consider the ratification of some additional ILO conventions (maternity, domestic workers) as a result.

Support to the GOP on its reporting obligations is planned in the coming year. In 2019/20 (year four) ILES tendered technical assistance contracts to facilitate its ILO and GSP+ reporting obligations. The following three reports will be updated and/or amended:

- A gap analysis of Pakistan’s existing international commitments and levels of legal compliance in its legislative frameworks;
- A review of Pakistan’s compliance with its GSP+ commitments; and
- A national occupational safety and health (OSH) profile for Pakistan (previous profile was produced in 2003).

Studies and Research: Following Sindh’s development and adoption of home-based workers legislation, in 2017/18 (year 2) ILES supported the development of an ILO Issue Paper on non-standard forms of work, identifying the extent and characteristics of non-standard forms of work in the province, and potential regulatory responses. The paper was intended to facilitate cross provincial discussions on the appropriate legal protections to workers engaged in non-

²⁴ The Sindh Industrial Relations Act 2013, Sindh Bonded Labour (Abolition) Act 2015, Sindh Prohibition of Employment of Children Act 2017, Sindh Terms of Employment Act (Standing Order) 2015, Sindh Workers Compensation Act 2015, The Sindh Minimum Wages Act 2015, Sindh Payment Wages Act 2015, Sindh Workers’ Welfare Management Act 2015, Sindh Companies Profit (Workers’ Participation) Act 2015, Sindh Shops and Commercial Establishment Act 2015 and Sindh Factories Act 2015.

standard forms of work. Based on its workplans, the project also planned support for “interventions to extend labour law and social security coverage to informal economy workers in textile and leather sectors” but to date, it has not undertaken any activities. A few evaluation informants highlighted opportunities for the ILO to contribute to efforts in Sindh to raise awareness and register home-based workers so that they can be covered by state social protection programmes, a right conferred by the Province’s Home-Based Work Act.

In 2019/20 (year 4), ILES commissioned research on legal and policy frameworks underpinning FOACB in Pakistan and on the country’s LDR mechanisms. ILO’s CEACR identifies significant points where Pakistan’s labour law and its application are not compliant with ILO core conventions 87 and 98. Two international specialists and one national consultant conducted extensive stakeholder consultations, which included diverse and high level tripartite

We have had comments from the committee of experts. We thought it was high time to get technical assistance from the ILO in these areas. **-Government representative**

The issues related to improving enterprise capacity on negotiations and collective bargaining is another area where we need a lot of training of our managers as well as trade union leaders. This will have a positive impact on the industrial culture -

federal and provincial officials and was supported by the EU Ambassador. According to project reports, the studies stimulated dialogue on legal and implementation issues affecting labour organizing and collective bargaining, responded to Worker Organization concerns (see section 3.1.2) and garnered commitments for follow-on action.²⁵ The FOACB study highlighted needed legal framework reforms while the study on LDR outlined a variety of potential actions to improve the process for registering trade unions and improve LDR efficiency.²⁶ ILES reported it has secured commitments from ILO specialists to follow-up on the two missions, and has made plans organize national “Way Forward” conference (now delayed due to Covid-19) and conduct various other follow-on research and events. Speaking broadly about past ILO research, one federal government representative said, *“These have provided a way forward. It helped us to make legislative reforms.”*

Labour Protection Frameworks: In 2017/18 and 2018/19 (year two and three) ILES facilitated tripartite consultation to support the federal Government’s National Labour Protection Framework (NLPF) initiative. ILES support resulted in three provinces drafting provincial labour protection frameworks (Baluchistan, KPK and Sindh), of which two have been adopted and one is in-progress. According to the project, the activity served to enhance capacity and strengthen the involvement of workers and employers in defining labour-related priorities and developing action plans. The frameworks covered the core labour standards as well as OSH, labour inspection and social dialogue. One ILO official highlighted limited follow-up on the frameworks as a gap. A member of the project team indicated that the project had limited human and financial resources to support follow-up on the action plans.

²⁵ Notably, the project reported it the Sindh Minister of Labour confirmed his departments willingness to participate in a reform process.

²⁶ Recommended actions included facilitating training and information sharing between provincial and federal trade union registrars, training for labour magistrates, developing trade union legal aid as well as alternative labour dispute resolution mechanisms.

Result 2.1 The textile and leather sector enterprises are supported to effectively implement national legislation and decent and safe work practices

As of the end of September 2020, the project had largely achieved its indicator targets associated with the project outcome on enterprise support but missed most targets related to industry association capacity building. Table 8 shows key achievements under each output, with additional detail provided on some key achievements below.

TABLE 8. ILES ACHIEVEMENTS SUPPORTING OCCUPATIONAL SAFETY AND HEALTH (OSH)

SPECIFIC OBJECTIVE 2: TEXTILE & LEATHER SECTORS SMES INSTITUTIONALIZE THE IMPLEMENTATION OF, AND COMPLIANCE WITH, ILES LEGISLATION

RESULT/OUTPUTS	ACHIEVEMENTS
Result 2 Textile and leather sectors enterprises and associations supported to effectively implement the national labour legislation, decent and safe work practices	– No data available on achievements against result/outcome indicators
Output 2.1.1 Enterprises are supported to comply with labour laws and standards	<ul style="list-style-type: none"> – 8 of 20 enterprises completed SCORE short course, 11 enterprises in-progress – 21 trainers trained in SCORE short course methodology, 6 trainers certified – SCORE Alumni network created, one event organized – One day OSH training -106 enterprises trained in two provinces, 95 textile/RMG, 11 marble, 0 leather (over target) – 41 enterprises received one day follow up visit (over target) – Productivity training -needs assessment conducted – Five Buyers' Forum meetings supported – Ongoing assessment of covid-19 impacts in SCORE enterprises and SCORE adaption
Output 2.1.2 Association-level capacities to promote national labour laws and business cases for ILS compliance improved	– Customized Employer's guide on COVID-19 developed and shared

SCORE: ILES implemented SCORE, an ILO methodology designed to improve productivity and working conditions in SMEs. Key features of SCORE are the formation of mixed management/worker enterprise improvement teams and the implementation of enterprise improvement projects, often starting with relatively simple activities. To date, SCORE has been implemented in 20 of 50 planned enterprises, which were all medium to large garment factories. An international SCORE expert trained 21 national consultants, six of whom were certified as master trainers, to facilitate SCORE in target factories and followed-up on implementation. To date, eight enterprises have completed the programme, one has dropped out following the start of the pandemic and eleven recently restarted after activities were disrupted by Covid-19.

SCORE has simple suggestions but big impact –SCORE trainer

SCORE's cross hierarchy and cross department teams have been helpful in gaining results that we were not able to get from even huge investment. – SCORE factory manager

Based on participant feedback, SCORE has contributed to dialogue and cooperation between management and workers leading to some productivity improvements. Several managers highlighted worker/management cooperation as a positive outcome of participation. For example, one manager said, *"The people who were engaging never had the opportunity to have a voice. Suddenly they are coming to the meeting with practical ideas, which made us realize that there were a lot of assets on the floor."* One worker concurred, *"We used to be terrified of top management, but this ten-minute meeting gave us voice and reduced our communication gap."*

Focus group participants also highlighted some gaps in the programme. These included: infrequent/gaps in follow-up from SCORE trainers/ILES personnel, the need for more significant inputs to improve enterprise productivity and the need to engage managers with decision-making authority. One senior SCORE trainer characterized the results in the first eight enterprises to complete the programme as mixed, indicating three or four enterprises had made good progress while the remaining enterprises had "mid to lower-level results." ILO programme managers and SCORE trainers highlighted initial challenges enrolling enterprises and collecting data to develop a planned "business case" for SCORE.

OSH training: Led by ILO's regional OSH specialist, ILES delivered one half to one day OSH training to 95 garment and textile as well as 11 marble enterprises in Karachi, Lahore, and Peshawar. The training helped participants to identify low-cost and no-cost OSH improvements in areas including materials handling, workstations, machine handling, physical environment, and welfare facilities. Initially organized in external venues, later training was delivered in workplaces to facilitate worker participation. One national trainer noted a successful aspect of the training was developing the capacity of mid-level managers and workers to assess their own health and safety issues. Two national consultants followed up on the training in 41 enterprises and identified improvements contributing to safer working conditions including cleared passageways, improved workstations (better chairs, provision of benches for resting), and basic air cooling. Like feedback provided on SCORE, some training participants highlighted the need to involve higher level decisionmakers in the training.

Customized Productivity Pilot Programme: ILES' plans to start implementation of a customized productivity programme in 25 enterprises next year (2021). The planned programme will be designed to offer more in-depth assistance to enterprises on productivity improvements than is currently planned through SCORE. To date, the project has completed a needs assessment but did not develop the terms of reference, tender, and choose an implementing partner this year as was planned. The project also planned an exchange visit to learn from ILO Ethiopia's SCORE programme with enhanced productivity interventions, which was postponed due to Covid-19 travel restrictions. A few stakeholders highlighted the limited time left to finish development and implement the programme between now and September 2022 as a possible challenge, especially given uncertainty about when Covid-19 imposed restrictions on fieldwork will be lifted. One evaluation informant also highlighted the importance of keeping SCORE's workplace cooperation approach in the new programme, *"I think sometimes what happens is programme management wants to have quick productivity gains and that becomes the traditional*

consultancy approach... With SCORE, we get more actors involved. We build an enterprise improvement team."

Pakistan Buyers' Forum: Following on from previous ILO and Dutch Government funded projects, ILES supported five Pakistan Buyer's Forum meetings since October 2016. The Pakistan Buyers' Forum mission is to facilitate and promote discussion on Buyers' codes of conducts including national and international law as well as international best practices, and their implementation in Pakistan.²⁷ Project support to continue forum meetings responded to ILO and EU priorities related to the promotion of responsible business practices by international buyers. ILES facilitated Forum members contact with the MOC to discuss how to bring more foreign buyers to Pakistan, otherwise project and Forum interaction was mainly information sharing. On its own internal role fostering positive changes in the sector, one Buyer's Forum representative indicated while members are actively engaged in their individual efforts to improve compliance, fostering cooperation between buyers was a challenge given reluctance to share information about suppliers. A Better Work official highlighted that ILES support for the Forum had been useful since it hoped to work with it in the future.

Progress toward outcomes and impact orientation: In its PMP, ILES outlined four "impact" areas for its policy and stakeholder capacity interventions: better alignment between national labour laws and ILS, labour administration capacity to implement and enforce national laws, social partner engagement in tripartite social dialogue and Workers' Organization capacity.

- ILES made demonstrable impact on aligning national labour laws and ILS with the involvement of social partners, considering its achievements to date under output 1.1.1 on legal framework strengthening (Sindh rules of business, labour protection frameworks, support for federal and provincial governments to develop strategies for improving OSH legislative frameworks and implementation). For example, one provincial labour official highlighted the impact of a previous ILO project and ILES follow-on support for the development of OSH legislation²⁸, *"No health and safety law existed in the whole of the country. Sindh took the lead. We were the pioneer and the other provinces followed us."*
- Less progress was reported on strengthening labour administration capacity to implement/enforce labour laws. One provincial official said while ILO assistance has helped to tighten legislation, *"Enforcement is the most difficult part so far. It has to be done by all the constituents together. The people involved are not very aware and do not know how to implement the rules. There is an urgent need to make them aware."*
- While the project has not carried out planned interventions aimed specifically at building tripartite structures, it involved provincial tripartite partners in its social protection framework intervention, in national meetings, for example on the submission of outstanding ILO instruments and individually in consultations associated with ILES

²⁷ <http://buyersforum.info/>

²⁸ ILES funded a national workshop on OSH reform, using Sindh as a case study and supported the drafting of various sets of legislative rules. A previous ILO project and the country office supported the work on the revision of Sindh's OSH law itself.

studies. In addition, the project tripartite steering committee was established by the MOPHRD in the project's second year and has met three times.

- Given ILES's limited Workers' Organization capacity building interventions to date, little progress was reported in this outcome area. No progress was reported strengthening workers' organizations capacity to represent workers in targeted enterprises or more broadly, in the targeted sectors.

At the enterprise level, ILES aimed to improve enterprise competitiveness and compliance with national and international laws and standards. To date, evidence is limited on the extent that ILES has contributed significantly to progress on these outcome areas. As highlighted above under achievements, enterprise level stakeholders reported anecdotal evidence on productivity and OSH improvements stemming from both the SCORE and OSH training interventions. More elaborate evidence is not yet available showing improved working conditions or higher levels of productivity as ILES has not yet documented enterprise level improvements in formal case studies or in a business case.

3.3.2 Environment component progress, achievements and impact orientation

Result 1.2 Capacity of federal and provincial administrations strengthened to better implement and enforce environmental laws and standards

As of the end of September 2020, ILES had largely achieved or over-achieved most of its output indicator targets associated with project result 1.2 under all four outputs. The area of least progress was planned support for strengthening provincial/federal information sharing on progress against MEAs. Table 9 shows key achievements under each output, with additional detail provided on some key achievements below.

TABLE 9. ILES ACHIEVEMENTS SUPPORTING IMPROVEMENT IN FEDERAL AND PROVINCIAL GOVERNMENT CAPACITY TO IMPLEMENT AND ENFORCE ENVIRONMENTAL LAWS AND STANDARDS

SPECIFIC OBJECTIVE 1: PUBLIC-SECTOR INSTITUTIONS IMPROVE THE ENFORCEMENT OF EXISTING LEGISLATION AND COMPLIANCE WITH INTERNATIONAL LABOUR AND ENVIRONMENTAL STANDARDS IN PAKISTAN AS WELL AS DEFINE NEW LAWS WHERE NECESSARY

RESULT/OUTPUTS	ACHIEVEMENTS
Result 1.2 Capacity of federal and provincial administrations strengthened to better implement and enforce environmental laws and standards	<ul style="list-style-type: none"> – 02 Policy recommendations submitted to EPA Punjab and Sindh. – Endorsement letters received from both EPAs.
Output 1.2.1 Support provided to strengthen National Environmental standards in textile and leather sectors to better comply with MEAs	<ul style="list-style-type: none"> – Various studies, situation and gap analysis – Policy recommendations submitted to Punjab and Sindh EPAs. Sindh developing "Clean Production Policy" – Green tannery guidelines submitted to Sialkot Tannery Association – Policy recommendations for the textile wing of Ministry of commerce or enhancing exports in progress – 351 people trained from

Output 1.2.2 Capacity of relevant target groups built for adhering to international environmental standards and addressing textile and leather sector related environmental issues	<ul style="list-style-type: none"> – Support for Environment day events – Various training and awareness raising events: 777 people trained – Various communication tools and media events
Output 1.2.3 Government and private financial institutions assisted to introduce green finance guidelines for SMEs	<ul style="list-style-type: none"> – Green financing study produced and diffused to financial institutions and industry associations – Green credit guidelines TOR drafted
Output 1.2.4 City-wide partnerships strengthened and expanded to other cities for addressing environmental issues	<ul style="list-style-type: none"> – 3 new + 1 existing city-wide partnerships forum supported (Faisalabad, Sialkot, Karachi, Lahore). – Pilot interventions supported in 2 cities, funding strategy in 1 city – -Established a ground water working group in Lahore

Policy recommendations ILES management indicated that the project sought and received government endorsement for several of its publications and one of two SOPs submitted to provincial EPAs for their consideration. According to several WWF personnel, project support to develop a draft Sindh Clean Production Policy was significant because it suggested ways provincial authorities could broaden its efforts in favor of compliance improvements from being primarily punitive to a more holistic strategy. One WWF manager claimed, *“We were able to convince provincial authorities they needed to provide a carrot not just try to use a stick”*

Green Tannery Guidelines: ILES developed a green tannery design layout, to improve practices and performance across the tannery sector. As noted earlier, the project signed an MOU with the Sialkot Tannery Zone. Zone managers reported that with ILES support, they have integrated green tannery guidelines into the zone bylaws and plan to use ILES' green tannery design within the zone. One zone official affirmed, *“With collaboration from WWF, we are developing a green tannery layout comprising different sizes of factories, according to which 50 percent solid waste will be cleaned from water before reaching the treatment plant.”* In addition to its collaboration with zone managers, WWF has also included leather enterprises that will relocate to the zone in its SEMP audit, awareness raising and training activities.

Green Credit Guidelines: ILES commissioned a study *“Facilitation of Green Financing for Leather and Textile SMEs from Financial Institutions in Pakistan”* which provided detailed analysis of the current regulatory environment and global best practices to promote green financing in Pakistan. WWF shared the findings of the study through two dissemination workshops organized in July and August 2020. Following up on the study, the project issued terms of reference to develop green finance guidelines. Financing for environmental upgrades was reported to be one of the main challenges impeding enterprises from improving their practices. ILES management indicated it hopes that its efforts will lay a foundation for expanding currently available financing green facilities, which to date focus solely on renewable energy. The financing study author noted that financing facilities should be adapted to enterprises with different capacities, noting that SMEs often face challenges accessing bank credit. A State Bank of Pakistan representative praised WWF efforts to date while indicating the need for more bank capacity building on environmental risk assessment.

City-wide partnerships: ILES provided support for four City-Wide partnerships in Faisalabad, Karachi, Lahore and Sialkot (one formed by a previous project and three by ILES). The

partnerships combine relevant provincial administrations, community groups and non-governmental organisations, and aim to improve environmental policy, and legal framework implementation and enforcement. One of the ILES aims was to establish a funding strategy for the partnership. By developing partnership pilot projects in Sindh, WWF succeeded to bring Pepsi on board to fund follow-on activities to improve municipal water management.²⁹

Feedback on training and other workshops: ILES reported nearly 800 participants in various training and other workshops on environmental issues³⁰. Based on WWF annual internal monitoring briefs, a total of 233 participants from both public and private sector filled out the post training evaluation forms after attending various trainings and workshops organized under the ILES project. The analysis³¹ indicated an increase of thirty percent in the number of participants who perceived their knowledge of the training subject matter to be very good or excellent. In addition, about 97 percent of participants agreed that WWF training would help them to improve their work practices.

The most cited changes perceived by participants in ILES training and other workshops for government, industry association and media based on the evaluation online survey³² were greater knowledge of international environmental standards and Pakistan's MEA commitments, techniques to reduce the negative environmental impact of textile and leather enterprises and how to monitor environmental compliance in enterprises (6/8 respondents for all).

Result 2.2 Targeted textile and leather SMEs implement smart and low carbon environmental practices

As of the end of September 2020, ILES had achieved or nearly achieved most of its output indicator targets associated with project result 2.2 under all four outputs. Table 10 shows key achievements under each output, with additional detail provided on some key achievements below.

TABLE 10. ACHIEVEMENTS SUPPORTING IMPROVED ENVIRONMENTAL PRACTICES BY ENTERPRISES

SPECIFIC OBJECTIVE 2: TEXTILE & LEATHER SECTORS SMES INSTITUTIONALIZE THE IMPLEMENTATION OF, AND COMPLIANCE WITH, ILES LEGISLATION

²⁹ See <https://newsupdatetimes.com/pepsico-and-wwf-join-hands-to-replenish-ground-water-resources/>

³⁰ Issued covered in workshops included , compliance to national environmental laws and standards, MEAs, costs of pollution, and valuation of non-compliance, among others.

³¹ Collected data shows that the knowledge/skill level of 2% of the participants on the training contents was poor, 15% was satisfactory, 35% was good, 35% was very good and 13% was excellent before the training. After attending the training, the knowledge/skill level of 1% of the participants on the training contents was poor, 6% was satisfactory, 15% was good, 47% was very good and 31% was excellent. Almost 97% of the training participants recommended the same training to other colleagues in their departments/organizations and 99% of the participants were satisfied with the training.

³² The sample size of this survey was small: eight respondents, the majority from industry associations (6 out of 8 respondents).

RESULT/OUTPUTS	ACHIEVEMENTS
RESULT 2.2 Targeted textile and leather SMEs implement smart and low carbon environmental practices	<ul style="list-style-type: none"> – Draft business case on 25 progressive enterprises documented the following resource savings: <ul style="list-style-type: none"> · 679, 456 m3 of water · 4.45 million kWh electricity · 4.4 million m3 of gas · 194-ton wood · 5,154 ton of coal.
Output 2.2.1 Integrated framework developed on MEAs and national environmental standards for better compliance in textile and leather sectors	<ul style="list-style-type: none"> – Consultations with MCC and Punjab EPA; TORs integrated framework development – 25 targeted performance analysis in progressive enterprises, 20 post audits have been completed – 1 life cycle assessment of textile product complete, 1 for leather underway
Output 2.2.2 Targeted SMEs from textile and leather sectors implement the Smart Environmental Management Practices (SEMPs)	<ul style="list-style-type: none"> – 40 non-progressive enterprises performance analysis conducted; 14 post audits have been completed – 20 workshops w/nearly 500 participants (14 combined workshops, 6 workshops for individual enterprises) – 2 enterprises (offices) certified green office initiative; 45 enterprises trained
Output 2.2.3 Textile and leather processing supply chains supported to increase export for international brands	<ul style="list-style-type: none"> – Planned supply chain mapping initiated with 3 brands – Representatives of retailers and supply chain trained
Output 2.2.4 Targeted SMEs from textile and leather sectors implement the Alliance of Water Stewardship (AWS) standards	<ul style="list-style-type: none"> – 15 enterprises supported to implement the AWS standards, 1 enterprise certified

The audit was useful. We had a lot of problems related to air, water, heat losses, and electrical... We benefited financially [by addressing these problems]. –SEMP Factory Manager

Smart Environmental Management Practices (SEMP):

ILES undertook environmental performance analysis in 25 progressive and 40 non-progressive enterprises and provided these as well as other enterprises with training and other technical support to implement SEMPs. In total, ILES reported SEMP training nearly 500 enterprise

level participants. All 31 SEMP enterprise survey evaluation respondents either agreed or strongly agreed that their participation in ILES activities had been useful to improve their enterprise's compliance with international standards. The most cited SEMPs implemented in enterprise survey respondents' factories were implementing water reuse and recycling measures (18/31 respondents); improving solid waste and chemical stores (17/31) and installing energy efficient motors (17/31 respondents).

Alliance of Water Stewardship (AWS) standards: The Alliance for Water Stewardship (AWS) is a voluntary standards-related group which advises industries on water stewardship. To date, ILES signed agreements with six enterprises to implement the AWS 2.0 standard. Assisted by the project, US Denim Mills became the first textile enterprise in the world to be awarded the AWS2.0

Without WWF, we would not have been able to achieve the certification. They supported and provided guidance. –

certification. According to a representative of the company, *“We think this certification will help us to grow our market... I think it will give us confidence with customers.”*

Progress toward outcomes and impact orientation: Based on ILES’ PMP, the environment component outcome indicators were the level of endorsement by EPAs of project policy recommendations, the number of EPA SOPs developed and adopted, and the percentage of improvement in environmental performance. The evaluation team remarked evidence of progress in all three impact areas:

- The Sindh EPA published a press release on its website indicating it has prepared the initial draft of the Clean Production Policy with and has initiated a consultative process to get views of stakeholders before finalizing the policy.³³
- ILES developed and submitted SOPs for prosecution of environmental cases in tribunals with the EPAs in Punjab and Sindh. The Punjab EPA endorsed the proposed procedures while Sindh’s endorsement is still pending.
- Factory manager online survey respondents reported various changes in knowledge and practices. The mostly commonly cited changes cited by survey respondents since they participated in WWF activities were more awareness/knowledge of environmental standards and laws among management personnel (24/31 respondents); improvements in water efficiency (20/31 respondents), and; improvements in energy efficiency (18/31). The least cited were more awareness/knowledge of environmental standards and laws among production personnel (12/31) and reduction of production costs (10/31).
- Based on ILES’ draft business case report of the case for progressive industries, assisted enterprise reported annually savings of 679,456 cubic meters of water, 4.45 million kilowatts electricity, 4.4 million cubic meters of gas, 194 tons of wood and 5,154 ton of coal.

3.3.3 Challenges

Evaluation respondents identified many challenges that adversely affected progress on both the policy/capacity building as well as enterprise level interventions under ILES’ labour and environmental components.

Multiple and poorly coordinated project counterparts: Several project personnel (ILO and WWF) pointed to challenges coordinating policy interventions between the federal and provincial level stakeholders given limited communication and collaboration between them. One ILO project manager said, *“With devolution, ILES was dealing with not just one law but five – the federal and four provinces.”*

A few evaluation informants pointed to the need for stronger coordination of provincial labour-related policy efforts. One key informant was critical of the distance between the ILO and provincial counterparts, *“You can’t sit in Islamabad and think you can do things. That can’t be done. You have to adopt to the new governance culture.”* In contrast, one WWF manager

There is a need to further strengthen coordination with stakeholders at the provincial level and focus on their emerging needs. – ILO project manager

³³ <https://epasindh.gov.pk/pressrelease.htm>

highlighted the benefits of field staff, *“We have four project sites... At all these four sites, we have staff who have done their own stakeholder engagement. They were the ones that informed our decisions about partnerships.”*

Difficulty agreeing on areas of collaboration: A few ILES project managers on the labour side indicated that ILES and ILO tripartite constituents have found it challenging to identify policy reform areas for which there is strong constituent buy-in. The evaluation team observed strong demand for ILO support in areas largely outside the project’s scope such as labour reporting and labour inspection strengthening. Similarly, EPA officials requested ILES support to upgrade its laboratory facilities.

ILO constituent sensitivities on ILES cooperation with other partners: Based on various ILO personnel, ILES efforts to form partnerships with relevant industry trade union and employers’ associations as well other labour-oriented research and advocacy groups were constrained by objections from ILO’s traditional partners. For example, according to one ILES programme manager, *“when we tried to work with the Homebased Workers Federation [on planned informality related initiatives], there was a strong reaction.”* In Sindh, the province’s Tripartite Consultative Council is composed of labour and industry groups drawn mainly from outside ILO’s main constituent counterparts, which key informants likewise said constrained ILES’ collaboration with them. Finally, planned capacity building for Workers’ Organizations was affected by divisions within the country’s trade union movement.

Bringing government stakeholders on board is a challenge, because of frequent replacement of higher-level management and different aptitudes within the department. Middle tier should be trained to support the agenda. – WWF implementing

Constituent capacity constraints: Evaluation respondents across most stakeholder groups highlighted that federal and provincial labour authorities as well as Workers’ and Employers’ organizations struggled to fulfill their mandates with limited human and financial resources and this negatively affected their capacity to absorb project

assistance.

Traditional “mindsets” on employer/worker relationships and female participation: Various key informant on the labour side likewise highlighted that project methodologies promoting worker participation and gender integration came up against deeply held beliefs favouring traditional hierarchies and gender roles. These were further reinforced by more limited educational and training opportunities afforded to females. In discussion groups with factory managers participating in WWF’ SEMP intervention highlighted the need for and challenge of engaging workers in improving enterprise level environmental practices.

Coronavirus imposed restrictions: Government and ILO mandated travel restrictions and social distancing have hindered nearly all activities requiring travel and/or large, face-to-face gatherings, which included most training and other events with project federal, provincial and enterprise level stakeholders.

3.3.4 Sustainability

This subsection assesses ILES sustainability through two lenses: the degree there is national ownership for project objectives and ways the project is building national institutions capacity to continue and/or scale key project interventions.

Progress fostering national/local ownership. Evaluation respondents in all stakeholder categories related ILES focus on improving compliance with priorities such as generating more and higher quality employment, attracting foreign investment and/or increasing exports. Two external drivers of change often highlighted by key stakeholders were the need to keep preferential trade status with the EU, which was conditioned on compliance improvements, and meeting foreign buyers' requirements. For example, one WWF project manager claimed, *"The project has been more relevant and required than it was in 2015 [when it was designed]. ILES was started in the context of GSP+ and trade because we wanted to help stakeholders in Pakistan to comply with EU standards on responsible business. Since then, other actors like international brands are putting more pressure on suppliers to comply."* One Employers' Organization representative highlighted industry's sustained interest in ILES objectives, *"So far, the focus has been on the enterprise efficiency and compliance which is a priority. The more they are compliant, the easier will be their access to global markets."*

Several factory management personnel emphasized that to have their continued commitment and/or more consistent implementation of recommended changes, ILES needed to demonstrate its programmes contributed to increased productivity and/or profitability. For example, one SCORE factory manager said, *"With no technical advice for improvement in productivity, people start losing interest. At the end of the day, we have to run business..."* Another said, *"Going forward, from our perspective we need to be very clear and very selective and choose [SCORE enterprise improvement] projects which will actually benefit our business. Otherwise, if we take up a project and if we are not able to make tangible results, then that project fails and the effectiveness of the SCORE programme starts failing as well because people will believe in it less and less."* WWF enterprise partners demonstrated ownership for project objectives by investing their own funds in environmental upgrades. Based on the business case prepared by WWF, progressive enterprises reported investing 187.63 million Pakistan rupees (USD 1.2 million) in environmental upgrades.

Provincial labour official and ILO officials' feedback highlighted that ILES' contributions to strengthening the legal/policy framework created long-term obligations and or guidelines for national stakeholders. For example, one provincial labour official said, *"As a result of the labour protection framework, the federal government is asking for updates. We complained that you made us make commitments that we will have to carry out even after the project ends."* Similarly, the Sindh director general described the project supported Clean Production Policy as a pathway to a sustainable *"environmental legislative mechanism to provide detailed guidelines to manufacturing and services sectors for safer production practices."*⁶⁴

³⁴ <https://epasindh.gov.pk/pressrelease.htm>

Progress developing exit strategies: Regarding the sustainability of its enterprise activities, ILES has not yet articulated and implemented a comprehensive exit strategy for its enterprise services. It has however taken some preliminary steps.

- ILES has developed a cadre of qualified SCORE trainers with prerequisite skills to continue implementing the programme. It also involved two national consultants in its OSH training programme.
- The project has not yet designated an anchor organization for SCORE implementation, a sustainability strategy that has been part of SCORE implementation in other countries based on ILO specialists' accounts. The designation of an anchor organization has been a subject of internal debate. ILES project managers have to date not wanted to mandate SCORE trainers to affiliate with any one organization, leaving the choice to them. EFP officials indicated they would like SCORE to be run through them. One employers' representative said, *"From our perspective, the trainers should be our soldiers. If they are made independent in their activity, they will open their own consultancy services and they will work for their own commercial benefit. I don't think this is helpful."* ILES project management shared that it is still discussing with EFP on how it can have a role marketing and overseeing SCORE, eventually enabling the organization to attract SCORE trainers to work with them.
- ILES worked with several national institutions to conduct research or deliver services to its environment component enterprise partners. WWF conferred enterprise environmental audits to its long-time partner the Cleaner Production Institute and worked with the Alliance for Water Stewardship Pakistan chapter to deliver training and technical assistance to enterprises interested in obtaining AWS certification. In addition, it has engaged several academic institutions in its research activities and more broadly supported the institutions through workshops and by taking on student interns.

3.4 Resource use efficiency

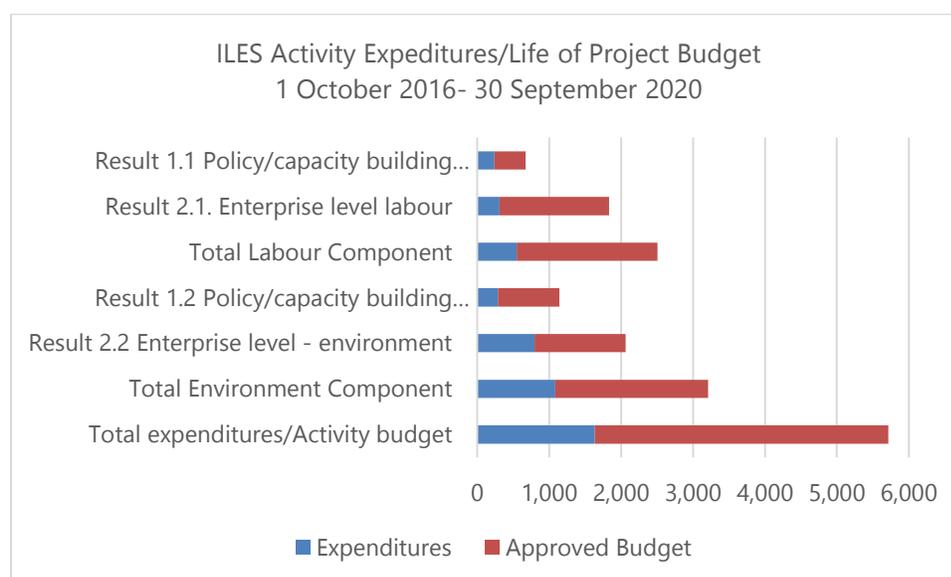
To evaluate resource-use efficiency, the evaluation team examined the percentage of ILES budget allocated to activities, project spending rates to date, and spending projections. The team also examined various evaluation key informants' perceptions of intervention cost-effectiveness.

Budget allocations for programme management versus activities: In 2018, in conjunction with the project's evaluability assessment, ILES moved approximately EUR 425,000 from ILO staffing and office costs into both labour and environment activity line items. One ILO manager described the realignment as necessary and strategic because overall too few project resources were allocated to activities (about 29 percent in the original budget, rising to 39 percent following the budget revision). Most of the funding for activities went into the labour component's enterprise support line item, which according to ILES management, had been largely underbudgeted. The revision reduced the total number of ILO technical personnel by one and relocated all ILO personnel to Islamabad.³⁵ Only small adjustments were made to the WWF budget. According to evaluability assessment author, the adjustments were *"highly relevant as they will allow the ILO*

³⁵ Previously, there were four programme managers, one based in each of Pakistan's four provinces.

project team to increase spending on both objectives rather than decreasing the policy work to fund the enterprise level activities.”

Project expenditures against planned expenditures: ILES total life of project budget is EUR11.6 million of which the project has expended and committed³⁶ nearly EUR 4.0 million or 42 percent as of September 30, 2020, based on the project's latest financial report. Analysis of project expenditures on activities shows significant differences in spending rates by component and by policy/capacity building versus enterprise level activities. Overall, the labour component (ILO) spent 28 percent of funds allocated for activities while the environment component (WWF) has spent 50 percent of its environment activities budget. ILO spending on policy/capacity building activities as a percentage the life of project budget (55 percent) is significantly higher than its spending on enterprise level activities (20 percent). The opposite is true for WWF. It has spent 33 and 63 percent of its total budget for policy/capacity building and enterprise level activities, respectively.



Expenditure analysis only considers expenditures to date against the life-of-project budget. Different components of the project projected different spending rates but overall, both the labour and environment components expected that after year four, expenditures on activities would be declining as the project moved into consolidation mode. In contrast, ILES initiated large new labour policy intervention areas (FOACB, LDR) with several planned follow-on activities in year four with the bulk of planned follow-on activities yet-to-be initiated. At the

³⁶ According to project personnel, financial reporting includes ILO but not WWF committed funds (e.g. existing contracts and staffing costs)

enterprise level, ILES is less than halfway through SCORE implementation (19 out of 50 planned enterprises) and has yet to begin its customized enterprise productivity programme.

Factors affecting efficiency: ILES management highlighted that the euro appreciated by about 66 percent relative to the Pakistan Rupee over the implementation period. The latter issue affected WWF more overall since most of its costs are denominated in rupees. Project management personnel also cited other factors that negatively affected project efficiency to date. The labour component was negatively affected by delays recruiting the ILO project manager, the lengthy project review and budget realignment, the lengthy absence of the ILO project manager due to illness and the coronavirus pandemic.

Considering current progress, both sides of the project expects a budget surplus and have forecast sufficient funding to allow for a no-cost extension. According to ILO management, it forecasts sufficient resources to extend ILES by 12-15 months while WWF estimates it has sufficient resources for two more years. According to ILES management, based on comments in the last project steering committee meeting, the EU delegation indicated that a no cost extension would be acceptable given the impact and uncertainties of the current COVID pandemic.

Perspectives on ILES human resources allocation efficiency. The evaluation team observed, and evaluation respondents highlighted the following issues related to human resource management efficiency:

- There are significant differences in the numbers of programme management personnel on the labour and environmental components. ILO has a relatively small team with five fulltime programme personnel, all based in Islamabad while WWF has 16 full time technical personnel, most based in Lahore but with project coordinators in the three other cities in Punjab. The difference in team size is likely reflects in part that staff costs are relatively higher in the UN system in Pakistan compared to international NGOs like WWF.
- WWF outsourced some of its interventions like factory audits and research to local organizations and in addition had field-based WWF site coordinators to follow-up. ILO on the other hand largely managed activities in-house, through consultants and/or with support from ILO specialists. Regarding ILO specialists, the project paid their travel expenses while their salaries were covered by the ILO core budget and counted toward the ILO's contribution to ILES' budget.
- Among ILO personnel, perspectives diverged on how efficiently ILES managed SCORE activities, with a couple respondents highlighting that team member roles were not well-defined (too many programme managers spending too much time on SCORE) while the other evaluation respondents indicated programme managers enterprise level follow-up was insufficient.

3.5 Visibility

ILES communication initiatives: ILES communicated about its activities through a variety of activities and strategies.

- Both the ILO and WWF feature information about project activities on their respective websites and produced communication materials featuring the EU logo, as required in the donors' branding and marking policy.
- Recognising that media personnel are important stakeholders regarding awareness raising on environmental compliance, the environment component conducted journalist training.
- Video documentaries on ILES initiatives on its SEMP³⁷ and City-wide partnership pilot activities³⁸ attracted over 50,000 and 70,000 views respectively as of December 2020. ILES likewise produced animated videos in support of Covid-19 SOP implementation for project counterparts in multiple languages.
- Both the Labour and Environment components organized awareness building events to celebrate various World Days that drew stakeholder as well as wider public attention to project themes (OSH, Water Conservation, etc.)

Visibility of the EU: The EU participated on the project steering committee which offers it the opportunity to engage with project stakeholders and share its concerns. Evaluation respondents reported that they were aware of ILES' donor and linked ILES activities with GSP+ benefits and requirements. One ILES programme manager opined, *"All our stakeholders are aware that this project is funded by the EU...But the project can do more to help EU with visibility, coordination and communication."* Another programme manager suggested after pandemic restrictions were lifted, ILES should organize and encourage EU participation in large annual meetings, offering EU representatives to voice their perspectives and concerns more visibly to project stakeholders. A EU representative strongly recommended that the ILO, through ILES, provide more data on Pakistan's progress implementing ILES per its GSP+ commitments to assist the delegation in identifying gaps and needed actions to guide its policy dialogue and communication actions.

4. Conclusions

Conclusions on Relevance, Design Validity and Coherence

Improving compliance with international and national labour and environment laws and standards in Pakistan's textile/leather sector remains a high priority among evaluation respondents. Stakeholder acknowledgement of the need for improvements notwithstanding, various evaluation respondents cited wide-ranging priorities for assistance in order attain higher levels of compliance. Given the scope of needs and the project's modest resources, ILES'

³⁷ <https://www.youtube.com/watch?v=l6DmRhHZ5g&t=10s>.

³⁸ <https://www.youtube.com/watch?v=N0nnJ9s77R4>

objectives were relatively ambitious, even though its sector and geographic targeting and the projects relatively longer duration strengthened the project design.

Various stakeholders agreed that textile and leather SMEs are in greater need of external support to boost their compliance while, with donor acceptance, in both its labour and environment components, ILES has served many large, export-oriented enterprises. Strong external drivers of compliance improvements such as trade agreements and brand/buyer pressure affect smaller, domestic market-focused enterprises to a much lesser extent. WWF's approach of targeting of "progressive" and "non-progressive" enterprises appears to be a useful approach to ensure that ILES contributes to progress but does not target primarily the most advanced enterprises. Moreover, such an approach ensures that the business cases developed through the project reflect enterprises at different starting points in terms of their labour and environmental compliance, if not primarily small and medium enterprises.

ILES' 2018 logframe revision was effective focusing the labour component's enterprise level intervention strategy, but less so its policy and capacity building interventions which continued to lack specificity. Overall, the environment component's bottom-up intervention logic was strong and consistent. At the time of the evaluation, the labour component's policy/capacity building component was lacking clear focus overall as well as strong strategic linkages between the policy, institutional capacity building and enterprise level intervention strategies. Although the labour component featured successful interventions, limited synergies between them diminished the component's overall relevance and coherence to date. Based on its workplans, ILES' labour component initiated and planned additional policy and constituent capacity building work in 2020, which was delayed by the onset of the pandemic. Much of this work has been reprogrammed and expanded in 2021, and if carried out may lead to a more focused policy and capacity building intervention strategy.

In contrast, linkages between WWF's different environment intervention strategies were stronger: assess enterprise level/city-wide opportunities to improve environmental practices → pilot solutions → draw conclusions/demonstrate benefits → inform/influence institutional policy and programs and public opinion. Moreover, WWF's largely disciplined focus on target industries and their key "problem areas" was useful to maximize project results as well as to produce good practices and lessons learned that might benefit the whole industry. WWF's green finance and awareness raising/communication activities likewise appear strategically important and complementary to its enterprise level facilitation approach.

ILES has been largely effective coordinating its work with other similar initiatives in Pakistan. However, potential synergies between WWF and ILO programming have not yet been exploited to their full potential. An example of effective coordination was ILO's decision to focus labour component activities in Sindh, avoiding unnecessary competition with similar GIZ activities in Punjab. Within the ILO country programme, ILES coordination with Better Work, potentially soon to be the largest ILO programme in Pakistan, has likewise been effective. ILES has taken a complementary approach in its enterprise level interventions and has helped Better Work address some anticipated risks in recent assessment on Freedom of Association and Collective Bargaining (FOACB) and Labour Dispute Resolution (LDR). It could do more. The two programmes together, as well as ILO's DG Trade funded project share commonalities (same

sector and/or compliance focus) that make joint strategic planning useful. Similarly, closer integration of ILES' labour and environment components in enterprise level activities offer promising opportunities for synergies (importance of workplace cooperation on both sides and the intersection of OSH and good environmental practices). There may likewise be opportunities for synergies between WWF and Better Work, if/when the programme is established in Pakistan.

Conclusions on implementation progress and effectiveness, impact orientation, and sustainability

ILES' labour component has produced notable achievements, but progress on several planned outputs is lagging. Achievements included: advancing Government of Pakistan (GOP) submission of ILO resolutions and other policy instruments to relevant national authorities as a step toward implementation of ILO Conventions and Recommendations; support for Sindh Rules of Business which define how provincial labour laws should be implemented, and; recent FOACB and LDR assessments, which highlighted gaps and suggested relatively well-defined follow-on actions for which there appear to be national stakeholder buy in. At the enterprise level, ILES successfully launched two out of three planned enterprise support programmes, completing planned Occupational Safety and Health (OSH) training for 100 enterprises, and initiating the Sustaining Competitive and Responsible Enterprises (SCORE) programme in 20 of 50 planned enterprises. Participants in enterprise programmes reported small but positive changes in working conditions and cooperation between workers and management.

ILES' environment component is progressing steadily toward most planned outputs producing positive outcomes such as leveraging target enterprise investments in environmental upgrades, conserving resources, and increasing productivity. Key policy level/capacity building achievements include support for the draft Sindh Environmental Protection Agency's Clean Production Policy, expansion of city-wide partnerships and mobilizing corporate social responsibility investments in municipal water management, integration of green tanneries guidelines in Sialkot Tannery Zone bylaws and collaboration with the State Bank of Pakistan on green financing guidelines. At the enterprise level, ILES' Smart Environmental Management Practices (SEMP) programme conducted environmental assessments in 65 enterprises and post assessments in 34. ILES' draft business case documented that target enterprises that implemented project recommendations realized significant water, electricity, gas, wood and coal use savings. Moreover, the first textile enterprise to achieve Alliance for Water Stewardship (AWS) 2.0 certification was an ILES partner.

ILES faced a variety of challenges that hindered progress. Key challenges included coordinating policy interventions between the federal and provincial levels, overcoming counterpart capacity constraints (e.g. few and changing GOP counterpart personnel, financial resource constraints) and identifying shared priorities. ILO interventions were also hindered by its main constituents' sensitivities on ILES cooperation with other partners. Project workplace cooperation methodologies came up against deeply held beliefs favouring traditional hierarchies and gender roles while lack of awareness of the negative consequences of poor environmental management as well as technical knowhow and financial means to implement solutions hindered more rapid adoption of SEMP. Finally, government and ILO mandated Covid-19 travel restrictions and social distancing hindered nearly all activities requiring travel and/or large, face-to-face gatherings

planned in 2020. Covid-19 challenges and risks continue, suggesting the need for project contingency plans anticipating stakeholders' different rates of recovery from Covid-19 in the coming year.

ILES' larger objectives benefit from relatively strong national stakeholder ownership which the project has leveraged to different degrees in its policy/capacity building and enterprise support interventions. ILES has only been modestly effective linking labour and environmental reforms and their implementation to broader, and arguably higher priority economic competitiveness and commerce policies. On the labour side, meeting GSP+ reporting obligations and facilitating the Buyers' Forum collaboration with the Ministry of Commerce intersected effectively with trade and competitiveness concerns. On the environment side, the draft Sindh Clean Production Policy and planned green financing guidelines broaden the State's largely punitive approach on environmental compliance to include more emphasis on the public sector role in helping industry achieve resource-saving environmental upgrades and practices. Likewise, green tannery guidelines and model designs were mainstreamed in a leather sector modernisation initiative in Sialkot. On the enterprise level, industry leaders emphasized that to have their continued commitment, ILES needed to demonstrate its programmes contributed to increased productivity and/or profitability. Evaluation findings suggest ILES has had some success in this area. WWF's progressive enterprise partners demonstrated ownership for project objectives by investing over USD 1 million of their own funds in environmental upgrades. On the labour side, the Employers Federation of Pakistan's (EFP) enthusiasm for SCORE is likewise a positive sign of ownership.

ILES has taken initial steps to promote the continuation of ILES interventions by national institutions but needs a more comprehensive exit strategy, especially for enterprise services. ILES has developed a cadre of qualified national SCORE trainers but has not yet designated an anchor organization or developed a business plan for programme continuity. On the environment side, ILES worked with several national institutions to deliver services to its enterprise partners and engaged academic institutions in research activities but likewise has not yet outlined a business model for continuing enterprise support services.

Conclusions on Resource use efficiency

The environment component's higher activity volume, greater progress toward targets, and higher activity budget expenditure rates suggests it was more efficient than the labour component, although both components featured examples of effective strategies to increase cost-effectiveness. ILES's 2018 budget revision reduced ILO administrative costs and increased budget allocations for activities. Likewise, ILES effectively mobilised ILO labour specialists and local environmental and labour ((to a lesser extent) organizations as well as academic institutions to achieve project results cost-effectively. While both sides of the project were negatively affected by Covid-19, the labour component also experienced other early setbacks including its several months long recruitment process, lengthy strategy and budget revision, and a leadership gap due to illness. WWF appeared to benefit from a larger implementation team with greater proximity to interventions zones. As a result of slower than planned spending and local currency depreciation, ILES has sufficient resources to extend implementation by at least

a year and half, if not longer. An extension would likely allow the labour component to reach more of its objectives and for both components to consolidate and document results.

Conclusions on Visibility

ILES regularly communicated about its activities, making some progress raising the profile of labour and environmental issues in Pakistan but may do more. ILES trained media on environmental issues which aimed to promote higher levels and more informed press coverage of ILES activities. Both ILO and ILES developed communication materials about the project as well as project topics which were made visible on their websites and using some forms of social media. Evaluation respondents were largely aware of EU funding for ILES as well as the GSP+ benefit conferred on Pakistan by the Community. Although present in steering committee, ILES has not significantly amplified EU voice and concerns regarding Pakistan's labour and environmental compliance.

5. Recommendations

For ILES team:

1. To increase strategic coherence between enterprise and policy level interventions, develop synergies with productivity enabling environment stakeholders/programmes using mainstreaming approaches to promote compliance and improved practices.
 - Increase cooperation with MCC and Industry Associations– potentially expanding the project steering committee
 - Explore possible linkages to investment/business facilitation policy and programs: for example, Export Processing Zones, Sialkot Tannery Zone and similar initiatives
2. Based on current and projected expenditures, develop strategy and detailed plan for no cost extension to be submitted to donor for its consideration.
 - Revise budget and update logframe targets and indicators as necessary. For example, develop indicators related to the specific roll out and expected outputs and outcomes of activities on FOACB and labour dispute resolution to replace generic indicators under result 1.1 and measure specific expected changes in institutional behaviors.

For ILO/ILES

1. In consultation with ILO Country Office and considering possible arrival of Better Work Pakistan, continue to narrow the focus of policy/capacity building interventions in remaining implementation period.
 - Maintain strong focus on Sindh province. Work in other geographic areas should be strongly justified

- Strengthen linkages between policy, capacity building and enterprise work, for example by reinforcing cross-cutting OSH linkages.
- Follow through on studies: Non-standard forms of employment, FOACB and LDR

2. Move forward with productivity program for 25 pilot enterprises keeping SCORE's workplace cooperation module at the core of the new programme. The terms of reference for the new programme should likewise require gender integration: female participation on committees, training for female workers (BW female supervisor training shown to improve productivity), accommodation for female workers (childcare and breast-feeding facilities). The new programme should feature a baseline and post-intervention data collection strategy so that ILO can develop and communicate the business case for programme interventions, including workplace cooperation.

3. Build capacity of EFP and SCORE trainers to develop a business plan to manage and market SCORE to industry post ILES. The plan might include a framework that would allow EFP to engage the services of SCORE trainers and offer SCORE training to members and others as an income generating service. The target market for SCORE training might include ILES targeted garment and leather enterprises as well as other enterprises from other industries.

4. Consider locating project personnel (regular ILO staff or ILO sub-contractor personnel) in Sindh. More clearly delineate programme managers responsibilities between enterprise level and broader institutional capacity building and policy level interventions.

For WWF/ILES:

1. Develop an exit strategy for SEMP and AWS enterprise facilitation interventions. In this context, explore possible synergies with Better Work.

2. Continue green financing guidelines work and plans to develop proposal for green financing facility. Consider developing a differentiated strategy for financing SMEs.

3. Consider intensifying support for the Sindh EPAs based on gap-analysis research and capacity building needs related to the implementation requirements of the Clean Production Policy.

4. Consolidate data and analyze trends in enterprise level audits and include with planned business cases. Based on results, develop industry-oriented briefs on topics of common concern with practical advice on "good practices."

5. Continue to facilitate networking and knowledge-sharing among key stakeholders (factory management, academia, government technical personnel): host topical and knowledge-sharing events. Consolidate participant database and target past participants with newsletter, technical briefs and/or invite to join online/offline community of practice.

6. Explore opportunities to integrate gender in activities. Some potential avenues include gender-focused research, one or more gender-focused pilot activity within city-wide partnerships, support to network female environmental engineers/engineering students.

For ILO Country Office:

1. Assess and develop longer-term integrated textile and leather strategy and develop new projects on high priority work areas not effectively addressed by ILES or other projects. Areas of work may include minimum wage setting mechanisms, extending social protection to home-based workers, labour inspection strengthening, and broad-based labour law reforms/labour protection framework follow-up.

For EU Pakistan delegation:

1. Continue to highlight outstanding concerns about Pakistan's compliance with international labour standards and multinational environment agreements in meetings with government officials and bi-annual GSP+ reviews
2. Consider strategic diversification of partners on-the-ground. For example, advocate for the right of European trade unions and other INGOs to provide support to Workers' Organizations in Pakistan's textile and leather sector on trade union strengthening, labour organizing, setting up workers' legal defense mechanism.

6. Good practices and lessons learned

Good Practices

ILES featured a variety of good practices that may be useful if replicated in other projects with similar conditions and objectives. Some examples are listed below.

Building a business case for compliance: In both its labour and environment component, ILES capitalized on its enterprise support activities to build a business case for compliance. To date, the environment component is well advanced documenting the business benefits of environmental upgrades and practices within progressive enterprises. Likewise, the labour component's OSH training activity demonstrated that enterprises could improve workplace safety through no and low-cost changes that likewise improve productivity. SCORE and ILO's planned new productivity programme, if implemented as planned, should both offer examples that demonstrate ways greater productivity and better compliance are complementary. For example, a representative of GIZ's productivity focused programme in Punjab highlighted that the project has been able to facilitate greater formalization of the textile workforce by demonstrating the importance of building and keeping a skilled workforce. The project manager indicated enterprise managers realized that if they were investing in building the skills of their operators, it would be advantageous to issue formal work contracts and pay benefits.

Mobilizing workers in factory improvement initiatives: In both ILES OSH training and SCORE programmes, involving workers in factory improvements was an important aspect of the intervention. For example, according to an ILO specialist, worker involvement is OSH promotion is important, noting the absence of worker involvement is often a gap in external audit-led approaches, *"This is why I say many companies have good drinking water facilities and fire*

facilities...but they are not always convenient to workers. Issues that are not covered by the audit tend to be missed." Under ILES, the ILO specialist is currently working on an OSH handbook for Workers' Organizations and is scheduled to deliver related training starting next year (in 2021).

Lessons learned

The evaluation suggests some lessons learned that may be used to inform the design and implementation of future ILO programmes. In particular:

Importance of a thorough project design and review process. The lengthy project revision and budget realignment in the project inception stage suggests that ILO project design review processes should be strengthened. The nature of some of the required changes – ensuring multiple ILO projects did not duplicate the others' efforts and adequately budgeting enterprise level activities are basic issues that should be caught during the initial project document review stages. While the evaluability assessment is a safe guard to improve the project intervention strategy in its inception phase, it is not meant to be a "redesign" exercise or to be a cause of a significant delay in project implementation. More generally, project documents should answer basic who, what, where, when, how and how much questions about what the project intends to do rather than describing broad areas of work and suggesting existing ILO methodologies without detailing how they will be adapted to a particular context.

Annexes

Annex A. Evaluation Terms of Reference

ILO IRIS Code	PAK/16/03/EUR
Project dates	1 October 2016 - 30 September 2022 (72 months)
Administrative Unit in charge of the project	ILO Country Office Islamabad
Unit in charge of backstopping	DWT/CO New Delhi
Timing of evaluation	Mid term Year 4
Type of Evaluation	Mid-term independent evaluation
Donor	The European Union Delegation in Pakistan
Implementing Partner	WWF-Pakistan
Budget	EUR 11.6 million
Evaluation mission dates	19 October – 10 November 2020- Evaluation methodology (especially the field mission) will be determined with evaluator, taking into the account the evolving COVID 19 situation and the risks associated with it
TOR preparation date	August 2020
Evaluation Manager	Rattanaporn Pongpattana, Monitoring and Evaluation Officer, ILO Regional Office for Asia and the Pacific

1. Introduction

The International Labour Organisation (ILO) calls for proposals from team of a home-based International evaluator (IE) and national evaluator (based in Pakistan) to conduct an independent Mid-term evaluation of the International Labour and Environmental Standards Application in Pakistan's SMEs (ILES) project, implemented by the ILO and World Wide Fund for Nature (WWF) and funded by the European Union (EU). This independent evaluation of the project will be undertaken in line with the delegation agreement between the European Union (EU) Delegation in Pakistan and the International Labour Organisation (ILO). It will be conducted in compliance with the principles, norms, and standards for project evaluations as outlined in the *ILO policy for evaluation: Principles, rationale, planning and managing for evaluations, 3rd edition (Aug 2017)*

The overall objective of this mid-term evaluation is to assess the relevance and validity of design, Coherence, effectiveness, efficiency, impact, and sustainability, of the project the visibility of the EU, as well as COVID-19 effect on the project. The specific objectives are to: (1) examine whether the project is working appropriately towards achieving the overall objective, and the intended specific objectives/outcomes ; (2) examine the current and future role of the project in contributing towards promoting the ILO's mandates and goals towards decent work, social dialogue, and social justice , and WWF's mandates related to the environmental improvement in the private sector, and draw lessons learned and identify good practices from the four years of the project's intervention; (3) propose recommendations to inform future

course correction of the ILES project in the remaining period, in light of the COVID-19 pandemic that have had effects on the needs and priorities of, stakeholders and beneficiaries.

The COVID-19 pandemic in Pakistan commenced in February 2020 and it is officially anticipated that the situation would hit its peak in the months of July and August 2020. Taking account of the COVID 19 situation, the mid-term evaluation of the ILES project will be conducted in a phased approach. In the first phase, it is planned that a home based International Evaluator will be conducting data collection completely ONLINE, with the research methodology based largely on desk review and online interviews (with limited online survey is possible). S/he will be assisted by the national evaluator in online interviews, field data collection, and stakeholder workshop. The first phase of the evaluation is scheduled between the dates of 1 October – 30 December 2020. A possible phase 2, will be further determined between the evaluation team and ILO in consultation with other project stakeholders.

The evaluation team will report to the Evaluation Manager , Monitoring and Evaluation Officer, based in the ILO's regional office in Bangkok, who will be managing the overall evaluation process with oversight provided by the ILO's evaluation office. The evaluation manager has no prior involvement with the project at any level.

2. Brief background of the project and context

Pakistan was given a Generalised System of Preferences Plus (GSP+) status by the EU on 1 January 2014. This allowed Pakistan to have tariff free access to the markets within the European Union on a wide variety of products. As a result, Pakistan's total exports to the EU increased by 64% during the period of 2014 to 2019.³⁹

The EU is by far the largest export market for goods from Pakistan, consuming one-third of Pakistan's total exports. Among the various products exported to the EU, textile, home textile and ready made garment clothing products form a major share i.e. 76% of total exports. Leather is also a significant export sector, providing particular challenges

For Pakistan, in order to retain the GSP+ status, it is important that it continues to ratify and improve compliance with international labour and environmental standards. Pakistan has ratified the 8 ILO Core Conventions required but implementation remains a significant challenge.

The International Labour and Environmental Standards Application in Pakistan's SMEs (ILES) project, funded by the European Union, is a customised project designed specifically to assist the government of Pakistan in improving its overall compliance with international labour and environmental standards, as well as institutionalising the compliance with these standards at enterprise level.

About the project

³⁹ "Pakistan and the EU" article retrieve from https://eeas.europa.eu/delegations/pakistan/1327/pakistan-and-eu_en

The project commenced in October 2016 and will end in September 2022. The project is intended to support Pakistan in maintaining its GSP+ status by improving compliance with international labour and environmental standards. The project is designed to work with the public sector (federal and provincial government, constituents including government and social partners (workers' and employers' organizations), as well as with the private sector in the textile, ready-made garment and leather sectors.

The EU has in place a Delegation Agreement with the ILO (a specialized agency/body of the United Nations). The environmental standards aspect of the project is delivered by the World Wide Fund for Nature, Pakistan (WWF), who were preselected by the EU, through an implementation agreement with the ILO.

The project is presently in its fourth year of implementation. It was extensively redesigned from its original form in 2018 following the ILO's Evaluability Assessment and the European Union ROM mission, which took place in 2018. As a result, the overall project's focus was narrowed and the logical framework revised.

Below are the project objectives, as per the revised log frame which was approved by the Project's Steering Committee in December 2018 and by the European Union in Nov 2019:

Intervention logic	Indicator
Overall objective : Sustainable and inclusive growth in Pakistan by supporting the economic integration and increased competitiveness of Pakistan into the global and regional economies	1 Level of compliance of national laws with international labour and environmental standards 2 Degree of target sectors' contribution to country's GDP
Promoting the enforcement and implementation of and compliance with International labour and environmental standards (ILES) by the public and private sectors in Pakistan. The two specific sub- objectives are; SO1. Public-sector institutions improve the enforcement of existing legislation and compliance with international labour and environmental standards in Pakistan as well as define new laws where necessary.	1.1 Degree of alignment between national labour and environmental laws and international standards 1.2 Level of implementation and enforcement of national labour and environmental laws
SO2. Textile & Leather sectors SMEs institutionalize the implementation of, and compliance with, ILES legislation	2.1 Number of enterprises compliant with labour and environmental standards disaggregated by sector and location 2.2 Level of competitiveness of enterprises and access to export markets disaggregated by target sector
Result component 1 Compliance to Labour Standards <i>(this component is implemented by ILO)</i>	

ER 1.1: Regulatory mechanism and enforcement of labour laws and standards at the provincial level enhanced in Pakistan	<p>Legislative regime:</p> <p>1.1.1 Degree of alignment between national labour laws and ILS</p> <p>disaggregated by focus area (including but not limited to OSH, national protection framework, informal economy, wages)</p> <p>Administrative structures:</p> <p>1.1.2 Degree of Labour Administration capacity to implement and enforce national labour laws</p> <p>Tripartite structures:</p> <p>1.1.3 Level of effective involvement of social partners in federal and provincial tripartite structures</p> <p>Workers orgs:</p> <p>1.1.4 Level of capacity of workers organizations to advocate for workers' rights and participate in CB</p>
ER 2.1. The textile and leather sectors enterprises and associations supported to effectively implement the national labour legislation, decent and safe work practices	<p>Pilot enterprises:</p> <p>2.1.1 Level of compliance with national labour laws and competitiveness of pilot enterprises</p> <p>Target enterprises:</p> <p>2.1.2 Level of compliance with national labour laws of target enterprises</p> <p>Associations:</p> <p>2.1.3 Level of awareness and capacity of Employers, Trade Associations and Chambers of Commerce to advocate for compliance with national labour standards</p>
Result Component 2: Compliance to Environmental Standards (<i>this component is implemented by WWF</i>)	
ER 1.2 Capacity of federal and provincial environmental administrations strengthened to better implement and enforce environmental laws and standards in Pakistan	<p>1.2.1 Level of endorsement by EPAs the developed policy recommendations for further actions</p> <p>1.2.2 Number of SOPs developed and adopted by EPAs</p>
ER 2.2 Targeted textile and leather SMEs implement smart and low carbon environmental practices for reduced water and energy footprints	2.2.1 Percentage improvement in environmental performance

Moreover, in line with the revisions to the logical framework, the project's overall budget was also redesigned, where a major share of the budget from the administrative/ office maintenance was moved to the program and activities implementation. These changes were also approved by the European Union in November 2019.

Public Sector Support:

The public sector support provided by the project is demand led. It is also useful to mention here that the labour and environment are two issues delegated to the provinces following the 18th amendment to Pakistan's Constitution in 2010, therefore the project's public sector support work is both with the federal and provincial governments. These interventions are national in nature.

The Evaluability Assessment conducted in 2018, identified a number of key areas mainly on part of the ILO's work, in which the federal and provincial governments and the ILO constituents had a particular interest and were included as priority areas. These were not intended to be exhaustive but did assist in narrowing the originally wide focus of the project. These areas are:

International labour standards compliance and reporting;

Occupational safety and health;

Wages and minimum wages;

Informality; and

Labour protection frameworks.

Moreover, Pakistan's economy and the possibility of the expansion of the ILO/IFC Better Work programme to Pakistan also provided the project with an impetus for potential interventions. In recent months the project has therefore supported a number of key researches and consultations on areas of concern and focus. These include freedom of association, collective bargaining and labour dispute resolution.

The WWF has already conducted a series of researches to assess environmental compliance across all provinces, and based on the findings, has already started supporting individual provincial governments to introduce improvements into their systems of implementation. WWF conducted studies on the importance of Environmental compliance and impact on economy with recommendations and opportunities. It is also working with the public and private sector financial institutions to introduce a system of green financing, where it has already started initial consultations with the State Bank of Pakistan.

Private Sector Support:

The project documentation originally committed the ILO to directly work with 100 enterprises and made reference to the ILO's Sustainable and Competitive and Responsible Enterprises (SCORE) methodology. The WWF enterprise level intervention drew upon its established and EU supported work in the textile sector. The project document indicated that enterprise level would be limited to Karachi, Sindh and Lahore, Faisalabad and Sialkot, Punjab.

The revision of the logical framework saw a substantial redesign of the ILO's approach, adopting a three tiered approach: occupational safety and health support to 100 enterprises in Punjab and Sindh (later extended to KP and Balochistan as requested by the Project Steering Committee); a modified SCORE methodology in 50 enterprises; and a tailored productivity support 12 month intervention to be designed and implemented in 25 enterprises. The preparatory work for designing of this course is already underway.

It is also important to note that following the Evaluability Assessment, ROM mission and discussions with the European Union Delegation and a large scale German funded programme consisting of a cluster of projects (also designed to support the textile, ready-made garment and leather sectors in Punjab, implemented by GIZ), the SCORE short course and productivity support course was limited to Karachi only. This initiative was taken in order to prevent duplication and competition between development partners.

Enterprise Size

The original design of the project focussed upon small and medium sized enterprises (size undefined) on the assumption that these enterprises contribute significantly to the export sector. The initial stages of the project identified a number of key challenges and, in particular, the fact that within the relevant sectors the majority of enterprises contributing to or capable of contributing to the export sector are, in reality, much larger. Even small scale enterprises within the sector exceeded most definitions of SMEs.

Linkage to specific SDG, ILO's P&B, and related targets and indicator

ILO Program & Budget (P&B): The Project contributes to three P&Bs including the P&B 2016-17, P&B 2018-2019, and P&B 2020-21.

It primarily contributes to the Outcome 2 of the P&B 2016-17 and the P&B 2018-2019 (Outcome-2 on "Ratification and application of International Labour Standards" indicator 2.2, i.e., Member States that have taken action to ratify and apply international labour standards, in particular in response to issues raised by the supervisory bodies), and the Outcome 2 of the P&B 2020-2021 (Outcome 2: International labour standards and authoritative and effective supervision).

The Project's secondary contributions are to the P&B Outcomes related to sustainable enterprises, formalizing informal economy, Workplace compliance, (protecting workers from unacceptable forms of work, Creating and extending social protection floors, and strong and representative employers and workers organizations.

Decent Work Country Program (DWCP) and Country Programme Outcome (CPO): This project contributes towards the Pakistan Decent Work Country Programme (DWCP-III: 2016-2020, extended to 2022). The DWCP has a specific priority on "*strengthening ILS compliance through social dialogue*" and it is translated into action under Country Programme Outcome (CPO) PAK-201, i.e., *institutional and individual capacities of tripartite constituents and stakeholders on ILS compliance and reporting enhanced* with a status as 'Target'., PAK-203: *Workers protected from unacceptable forms of work in identified sectors and or supply chains*, PAK-801: *Strengthened institutional capacity of employers' organisations*, PAK-802: *Strengthened institutional capacity of workers' organisations*, PAK-204 *Sustainable and Responsible Enterprises in Pakistan promoted* and PAK-202: *Workplace compliance enhanced through effective monitoring and labour inspection*.

National Priorities: The project links to the following national development frameworks; Pakistan's National Strategy, *Vision 2025*, the National Textile Policy (2014-19) and the Strategic

Trade Policy, and the National Policies and Plans of Action to Eliminate Child Labour and Abolish Bonded Labour, as well as the two labour policies in Sindh and Panjab (both from 2018).

UNDAF/One-UN Programme (OP): The project contributes to both the OP II (2013–2017) and the current OP III (2018–2022). It contribute to various Strategic Priority Areas (SPAs) of the OP II including SPA-2 (including economic growth through the development of sustainable livelihoods) with a focus on Outcome 2.2 (industrial development, both urban & rural, emphasising SME/SMI development, women’s participation, clean development & sustainable energy supply and use at affordable cost). It also contributes to SPA-4 (strengthened governance and social cohesion) with focus on Outcome 4.1 (capacity of institutions to be more democratic and accountable), 4.2 (rule of law and public security institutions strengthened to enhance public trust and social stability) and 4.4 (strengthened decentralized governance). The project’s contribution to the current One UN programme 2018–2022(OP III) including Outcome 1 Economic Growth, Outcome 2 Decent Work, Outcome 6 Resilience, Outcome 8 Gender, Equality and Dignity, and Outcome 10 Social Protection.

Sustainable Development Goals: The Project contributes towards the realization of the targets set under the following SDG’s: SDG 5: Achieve gender equality and empower all women and girls, #8- Promote inclusive and sustainable economic growth, employment and decent work for all, #12- Ensure sustainable consumption and production patterns, and #16- Promote just, peaceful and inclusive societies, SDG # 9- Industry, Innovation and Infrastructure. These goals are also part of the national framework for achieving SDGs.

Institutional arrangement:

The main stakeholders are the Government of Pakistan (at the federal and provincial level) through its relevant ministries and departments, such as the Ministry for Overseas Pakistanis and Human Resource Development (MoOPHRD), The Ministry of Commerce, the Ministry of Climate Change, the provincial Labour Departments, the Ministry of Commerce (Treaty Implementation Cell), Textiles Division, and provincial Environmental Protection Departments.

The project also works closely with employers’ and workers’ organizations and representatives.

Project management set-up

A three tiered supervisory and implementation arrangement of the project, includes:

a. Project Steering Committee (PSC)

The Project Steering Committee is co-chaired by the MoOPHRD and the EU and was notified by the Ministry on 3 October 2017. It is comprised of:

- Ministry of Overseas Pakistanis and Human Resource Development (MoOPHRD)
- EU Delegation in Pakistan
- Ministry of Commerce
- Economic Affairs Division
- Ministry of Climate Change
- Ministry Textile Industry

- Employers Federation of Pakistan
- Pakistan Workers Federation
- International Labour Organisation
- World Wide Fund for Nature (WWF)

It has met twice during the life of the project (due to a very lengthy delay in the Government of Pakistan notifying the committee formally and then agreement on a common date for convening the meeting) on 15 March 2018 and 7 May 2019.

b. Project Management Unit (PMU)

This Committee comprises of the Project Manager/ Technical Advisor, M&E Officer (from the ILO), Admin/Finance assistants and two National Project Coordinators (Labour), and the WWF Manager of the ILES project). The purpose of this unit is to review the day to day management of the interventions, ensure coordination between the two components for timely implementation of activities and have a constant check on overall financial and technical delivery without compromising the quality of the activities. The PMU also ensures that all project's progress is timely compiled and reported to the donor through agreed periodic narrative and financial reporting.

c. Project Implementation Teams (PIT)

The Project Manager/ Technical Advisor, who is an ILO official, ensures oversight of the effective implementation of the actions implemented by both the ILO and WWF. ILO Country Office for Pakistan, Islamabad is responsible for the overall project supervision and implementation and programming and administrative backstopping. With regard to technical backstopping of the project, ILO Specialists from Decent Work Technical Support Team for South Asia (DWT-New Delhi), as well as other ILO staff like from SCORE, contributed/backstopped before and after the project framework was reorganized in 2018.

The project comprises of two separate teams, one each for labour and environmental components. These teams are responsible for their own component activities. The coordination of the design and implementation of the two components is ensured by the Project Manager at both operational and enterprise level.

Labour Component:

The ILO has engaged one National Project Coordinator (NO-B), two Project Officers (NO-A), one M&E and Communications Officer (NO-A), two administration and finance assistants (one added during the budget revision) and a driver. This team is headed by an international Project Manager who is also the TA of the project. A further planned Project Officer role was deleted as part of the revision and one driver role was vacated and was not replaced

Environment Component Team:

The WWF has established project teams in four project field areas, i.e., Karachi, Lahore, Sialkot and Faisalabad. Each team comprises of one Environment Officer, one Site Coordinator and one Admin/Finance Assistant. These teams report to the National Coordinator Environmental

compliance and Manager compliance/Project Manager leads the overall project activities and implementation for the WWF component. The Project Director oversees the activities and guides team in the Project Support Unit (PSU) meetings which are held either on quarterly or need basis. Additionally, the environment component team also has a dedicated M&E office in place comprising of an M&E officer and an M&E manager and a Finance Officer, overlooking the quality delivery and financial management of the environmental component of the project.

Project Support Unit (PSU): The project support unit (PSU) comprises of Sr. Directors of Footprint, Sr. Director Conservation, Director finance, manager compliance and coordinator compliance along with Communication representatives. This PSU meets on quarterly basis or need basis in order to assess the project progress and updates.

There are few other committees in WWF in which ILES project updates are presented and is a platform to take advice from Sr. management of WWF.

Project Technical Committee: The committee comprises of WWF ILES team and CPI, which is the WWF's implementing partner. The technical committee meets on a monthly basis either virtually or physically to update on the project progress and the work regarding to Environmental assessments/audits.

Project Evaluation activities

Evaluability assessment

The ILES project underwent an Evaluability Assessment in February 2018 in line with the ILO internal procedures. As a result of this assessment, the overall ILES project's logical framework was revised, redefining the overall scope of the project, as described above. All revisions were then approved by the EU and PSC.

EU-ROM

An EU-ROM mission of the ILES project was undertaken in April 2018 using the OECD/DAC criteria that focused on the relevance and validity of design, validity of design, Coherence,, efficiency, effectiveness and sustainability of the project. The final report submitted as a result, recommended the project to focus more on increasing coordination with other projects working in the same areas as ILES to avoid duplication and ensure greater impact, enhance relations with trade unions and other business organisations, invest efforts to improve the capacity of its tripartite constituents, increase awareness of the trade unions, and adopt a result oriented approach for implementation of activities like the SCORE.

As a result, the ILES project took various initiatives, including convening a cross project workshop in May 2019 to establish relations with other projects working in the same areas as ILES. The same projects were also invited to the Buyer's Forum meeting which is also partly supported by the ILES project. Moreover, in order to improve relations with the trade unions and to increase their overall awareness, the project also held various events like the SCORE mobilisation event, and establishment of the SCORE alumni network, where representatives

from these trade unions were invited to participate. The project also held individual meetings with the representatives of the relevant organisations to improve overall collaboration and increase awareness about its activities.

3. Purpose of the mid-term evaluation

The overall objective of this mid-term evaluation is to assess the relevance and validity of design, Coherence, effectiveness, efficiency, impact and sustainability of the project as well as visibility of the EU and the COVID 19 implication on the project. The specific objectives are to: (1) examine whether the project is working appropriately towards achieving the overall objective, and the intended specific objectives/outcomes ; (2) examine the current and future role of the project in contributing towards promoting the ILO's mandates and goals towards decent work, social dialogue, and social justice , and WWF's mandates related to the environmental improvement in the private sector, and draw lessons learned and identify good practices from the four years of the project's intervention; and; (3) propose recommendations to inform future course correction of the ILES project in the remaining period, keeping in view the COVID-19 pandemic that have effects on the needs and priorities of, stakeholders and beneficiaries.

The evaluation is envisioned to highlight key areas of strength and improvement and guide the project to improve its overall delivery and quality of work in the remaining period of the project.

4. Evaluation scope

The evaluation will cover both the ILO and WWF components of the project from inception to the evaluation date. Where possible, interviews should be taken with real (ultimate) beneficiaries and recipients.

It will examine the methodology, deliverables, and give specific attention to how the intervention is relevant to the ILO's programme and policy frameworks at the national and global levels, UNDAF and national sustainable development strategy (or its equivalent) or other relevant national development frameworks, including any relevant sectoral policies and programmes, and international labour and environmental standards.

Use of the Evaluation:

The main users of this independent evaluation will include the ILO management at country, regional and headquarters level, WWF's management, the European Union, the ILO's tripartite constituents, the partners of the project and the PSC.

The evaluation will ensure that the issues and inputs from stakeholders/tripartite constituents are adequately covered in the overall evaluation exercise.

5. Evaluation criteria and evaluation questions

Below is the list of the evaluation criteria and suggested evaluation questions.

Where the evaluation questions (EQ) are not specifically addressing any particular component (i.e. labour or environment), it is expected that the evaluation team provides equal efforts to gather data necessary to address both components of the project (labour and environment).

RELEVANCE AND VALIDITY OF DESIGN	Is the project still relevant to beneficiaries', global, country, ILO and partner/institution needs, policies, and priorities, considering the changes in circumstances? Are there any areas or project activities that need to be modified in the second half of the project? What, if any, alternative strategies would have been more effective in achieving its objectives? Is the revised (2018) design sound to achieve the project objective (i.e. improved compliance to labour and environmental standards)? What must be changed to the ILES logframe, so that ILES reports results against the new SDG result framework?
Coherence	The extent to which other interventions and policies support or undermine the ILES interventions, and vice versa. The extent of synergies and interlinkages between the ILES interventions and other interventions carried out by ILO Colombo, Government and social partners
EFFECTIVENESS (including effectiveness of management arrangement)	Which outputs have been delivered since the inception and to what extent have they had/are having impact? On whom? Is the project making sufficient progress towards its planned objectives as laid out in the project's logical framework adopted in 2018? Will the project be likely to achieve its planned objectives upon completion? What are the main constraints, problems and areas in need of further attention? What should be done or done more by the project to promote enforcement, implementation and compliance with the International labour and environmental standards (ILES) by public and private sector in Pakistan? How far did the programme link and coordinate with other initiatives and programmes (including, but not limited to, especially BETTER WORK Pakistan) in order to enhance effectiveness, efficiency, impact and sustainability in relation to the peacebuilding objectives, the employment objectives or both?
EFFICIENCY	Are the financial resources and other inputs (technical expertise, staff, and time) efficiently used to achieve results? How did the organizations harmonize and coordinate their interventions with other partners? To what extent have the project resources been leveraged with other related interventions to maximize impact, if any? Are the human resource and time sufficient to achieve the project outcomes within the remaining timeframe? Is there a need for a project extension (cost/no cost) as a result of COVID19 and subsequent project delays, and an exit strategy?
SUSTAINABILITY	What strategies have the projects put in place to ensure continuation of mechanisms/tools/practices provided, if the support from the ILO

	Programme ends? How can the projects' key partnerships contribute to the sustainability of the initiatives under the projects and to what extent? How effective has the project been in establishing and fostering national/local ownership?
IMPACT	To what extent has the project contributed in promoting responsible business practices, in particular with regard to labour? To what extent has the project contributed to improved decent work and social dialogue and addressing poor working conditions, environmental issues, and capacity challenges in the target sectors? To what extent has the progress in the improvement of the international labour and environmental standards compliance in the private sector been made through the project interventions? Did the project cause unintended effects? What are the evidences?
Visibility	Has the ILES project contributed to the image/visibility of the EU in the country?
COVID 19	Examine the potential challenges for the implementation of the project in the immediate to medium term as a result of the COVID 19. Examine the specific needs and priorities, if any, of the project implementing partners induced by the COVID-19 outbreak. Identify possible strategies for implementation of project in the changed context of COVID-19 crisis, that would maximise the efforts to address challenges related to improved compliance to labour and environmental standards What specific measures shall the project take in light of the COVID-19 situation given the present scope of the project?

The evaluator is to adapt the above mentioned evaluation criteria and questions, but if there is any fundamental change, it should be agreed between the evaluation manager and the evaluator, and reflected in the inception report.

6. Cross cutting issues

The midterm evaluation of the ILES project shall be conducted, keeping gender equality as one of the key concerns. This implies applying gender analysis by involving both men and women in the consultation and evaluation's analysis, inclusion of gender in the analysis and justification of project documents, reviewing of project's objectives and indicators in line with its sensitivity towards gender; and assessing outcomes in terms of its role in improving lives of women and men.

The analysis of gender-related concerns will be based on the ILO Guidelines of *Considering Gender in Monitoring and Evaluation of Projects* (September, 2007). The evaluation will be conducted following UN evaluation standards and norms and the glossary of key terms in

evaluation and results-based management developed by the OECD's Development Assistance Committee (DAC).

7. Methodology

The ILO's policy guidelines for evaluation (3rd edition, 2017) provides the basic framework. The evaluation will be carried out according to the ILO's standard policies and procedures, and comply with the United Nations Evaluation Group (UNEG) norms and standards and the OECD/DAC evaluation quality standards.

As the COVID 19 pandemic continues to persist, this evaluation is guided by ILO's *Implications of COVID-19 on evaluations in the ILO: An internal guide on adapting to the situation*.

While the evaluation is determined to be online. It is noted that the evaluation methodology (especially the field mission) may be adjusted taking into the account the evolving situation and the risks associated with it. The following are two possible scenarios if the COVID-19 situation continues to persist. Situation will be assessed together with the ILO project team. Decision on final evaluation methodology will be decided before the contract is finalized and signed.

Scenario	Adaptation	Role	Tools
During the contract development phase, if travel restrictions are applied in Pakistan, Lock down applied and stakeholders are unwilling to meet in person	Totally remote	International consultant and National consultant to conduct remote interviews Web based survey Project management to provide stakeholder contact information	Skype, S4Biz, Webex or ZOOM Survey Monkey or similar tool
During the contract development phase, if travel restrictions still apply that restrict travel into Pakistan. But mobility within the country are allowed and some stakeholders are unwilling to meet interviewers in person	Hybrid—remote/face-to-face data collection	International consultant to conduct remote interviews Project management to provide stakeholder contact information National consultant to conduct limited face-to-face interviews if possible	Skype, S4Biz, Webex or ZOOM Survey Monkey or similar tool IOCE website to help identify national consultants

The proposed methodology includes:

Desk review of relevant documents including

- ILES ProDoc with all annexes (including original logical framework and budget)
- Delegation Agreement between the ILO and EU included all addendums
- Implementation agreement between the ILO and WWF included all addendums
- 2018 Evaluability assessment and ROM mission report
- Original and Revised logical frameworks
- Original and Revised budgets
- PSC/PAC meeting minutes
- Researches/materials/publications that were produced through the project or by relevant stakeholders.
- Policy documents reviewed/ revised by the project
- Government of Pakistan Vision 2025, Treaty Implementation Cell, TRTA I & II
- UNITED NATIONS SUSTAINABLE DEVELOPMENT FRAMEWORK FOR PAKISTAN Pakistan One United Nations Programme III (OP III) 2018-2022
- CEACR Report
- GSP+ review reporting
- Technical progress reports
- Buyers' Forum members list and meeting notes
- The ILO's SCORE methodology
- The ILO's OSH training approach, WISE methodology
- The ILO's Productivity course related documents
- The ILES project's Monitoring and Evaluation plan
- The ILES project's Communications plan
- The ILO's Annual programme reports
- The ILO's Evaluation guidance documents
- Project documents in relation to COVID response (IEC material and customised some internationally produced checklist and employer')
- Pakistan Decent Work Country Programme (DWCP-III: 2016-2020, extended to 2022).
- P&B 2020-2021 and "P&B 2020-2021 output indicators" document, shared by ILO HQs on 7 Apr 2020, explicitly include COVID implication in the detailed description of expected outputs.
- Visibility products

WWF component documents

- Project Document & ILES Brief
- Documentaries (explainer videos on project studies)
- Studies: "Situational analysis of water resources of Faisalabad", "Situational analysis of water resources of Karachi", "Situational analysis of water resources of Sialkot", "Economic impact and health implications of non-compliance of the leather and textile sector", "Situation analysis of national environmental laws and policies, non-compliance of these laws, resource efficiency gaps in implementation and enforcement"
- WWF-Pakistan's ILES communication strategy
- Scoping study on the EU standards in textile and leather sector of Pakistan

- Study to harness the potential of Textile and Leather Recycling in Pakistan and its role in achieving sustainability in textile value chain through reduction of environmental footprint
- Need Assessment Study to Facilitate Leather and Textile SMEs for Securing Green Finance from Financial Institutions in Pakistan
- ILES published materials, City-wide partnership brief, Leaflet on Chrome Recovery in Tanneries, Leaflet on Conserving Water in Textile Mills, Awareness raising materials
- Vulnerability risk assessment to Gauge impact of inefficient and unsustainable practices in the leather and textile sector
- PSU/PMU meetings minutes, MoUs and Letters of Intents with the stakeholders

Interviews (Telephonic/electronic (by IE) and face to face by NE (where possible)) with the following but not limited to:

ILO component

- ILES Project team (including the ILO and WWF project implementation teams)
- Representatives from the labour departments (KP, Punjab, and Sindh and Baluchistan)
- Representatives from the provincial and federal Environmental Protection Agencies (Punjab, AJK, Sindh, and KP)
- Any relevant representative from the Project Steering Committee
- EU focal persons (old EU project focal point, present EU focal point, any other person in the EU delegation to Pakistan, relevant to the project)
- ILES project's assisted enterprise representatives (workers and from management)
- Representative from the MOPHRD
- Representatives from Ministry of Climate Change
- Representatives from the SCORE global team, and the ILO's SCORE global trainer
- The ILO's national SCORE trainers
- The ILO's OSH specialist and the ILO's national OSH trainers
- The ILO's enterprise specialist and employers specialist from the Decent work team
- Workers' and Employers' Specialists and possibly other DWT colleagues
- Gender specialist (Gender is a cross cutting issue in ILO)
- ILS specialist (assisted the project in its initial years)
- ILO and WWF projects of relevance to the textile industry (for assessing synergies and coordination)
- The ILO Country Office for Pakistan's programme team and WWF Pakistan team
- Representatives from the employers and workers organisations
- Representatives from local trade associations in Karachi
- Members from the Alliance for water stewardship
- ILES project's present and ex- consultants
- Representative from the ILO/IFC Better work team
- (Ultimate) beneficiaries and recipients (where possible)

WWF component

- Business Associations (see full list in the Annex 3) s

- UNIDO
- Archroma Pakistan
- Cleaner Production Institute (CPI)
- Alliance for Water stewardship (AWS)
- Ministry of Climate Change
- Sindh Environmental Protection Agency (SEPA)
- Planning and Development Department Sindh
- Textile Commissioner Office, Karachi
- Planning and Development Board Punjab
- Environmental Protection Agency, Punjab (EPA Punjab)
- State Bank of Pakistan
- Pakistan Council of Research on Water Resources (PCRWR)
- Partner Universities (in Sindh, Faisalabad, Lahore and Karachi)

Data analysis and Triangulation /Validation: The evaluation consultant will ensure that the findings are evidence based. This implies that perceptions, hypotheses and assertions obtained in interviews will be validated through cross checks and triangulation of sources.

Note:

It is noted that the evaluation methodology (especially the field mission) will be designed by the evaluation team in consultation with taking into the account the evolving situation and the risks associated with it. Decision on final evaluation methodology will be decided before the contract is finalized and signed.

The methodology should include multiple methods, with analysis of both quantitative and qualitative data, and should be able to capture the contribution of each output to the achievement of expected outcomes.

To the extent possible, the data collection, analysis and presentation should be responsive to and include issues relating to diversity, gender and non-discrimination, including disability issues. All gender concerns should/will be addressed in accordance with the ILO's Guidance note 4: "Considering gender in the monitoring and evaluation of projects".

If the evaluators wish to propose any fundamental changes to the methodology of this evaluation, he/she should do so after consulting the Evaluation Manager and shall reflect the changes in the inception report.

8. Main deliverables

The evaluators will deliver the following main outputs:

Deliverable 1: Inception report, by 12 October 2020

The evaluators will draft an inception report upon the review of the available documents and Skype briefings/initial discussions with the project team, relevant ILO officials/specialists and, if required, the EU. The inception report will include the final evaluation questions, data collection methodologies and techniques, and evaluation tools as well as a completed Standard

evaluation instrument matrix⁴⁰. The methodology should clearly state the limitations of the chosen evaluation methods, including those related to representation of specific group of stakeholders.

The inception report will be prepared in accordance with the EVAL Checklist 3: Writing the inception report, and approved by the evaluation manager.

Deliverable 2: Stakeholder workshop/presentation on preliminary findings of the evaluation on 16 November 2020

At the end of the data collection exercise, the evaluation team will present POWERPOINT file detailing preliminary findings of the evaluation and proposed evaluation recommendations, at the stakeholders' workshop arranged virtually through Webex. The project team will provide necessary administrative and logistic support to organize this stakeholder workshop.

Deliverable 3: Draft evaluation report, by 30 November 2020

The draft evaluation report should be prepared in accordance with the EVAL Checklist 5: *Preparing the Evaluation report*, which will be provided to the evaluators. The draft report will be improved by incorporating evaluation manager's comments. Then the evaluation manager will circulate the draft report to key stakeholders including the project team, the ILO officials concerned with this evaluation, the EU and national partners for comments.

Deliverable 4: Final evaluation report with evaluation summary (in a standard ILO format), by 30 December 2020

The evaluators will incorporate comments received from the ILO and other key stakeholders into the final report. For finalisation purposes, the evaluator has to ensure that it is done in accordance with the EVAL *Checklist 5: Preparing the Evaluation report*.

The reports and all other outputs of the evaluation will be produced in English. All draft and final reports, including other supporting documents, analytical reports and raw data should be provided in electronic version compatible with WORD for Windows. The report should not be more than 30 pages (excluding annexures). Findings, gaps and results should have a logical flow, be credible and clearly presented.

The draft reports will be circulated to key stakeholders and partners of the project, relevant tripartite constituents, and the ILO's staff i.e. the project's management, the ILO's Regional office in Bangkok, the ILO Country Office for Pakistan and the ILO's HQ, for their review. Comments from all the stakeholders will be consolidated by the Evaluation Manager and will be sent to the evaluation consultant to incorporate them into the revised evaluation report. The evaluation report will be considered final only when it gets final approval by the ILO's Evaluation Office. The quality of the report will be assessed against the relevant EVAL Checklists (Checklist 6 Rating the quality of evaluation report, in Section 12).

⁴⁰ <http://www.ilo.org/legacy/english/edmas/eval/template-checklist3.doc>

Ownership of the data from the evaluation rests jointly between the ILO and the ILO's consultants. The copyrights of the evaluation report rests exclusively with the ILO. Use of the data for publication and other presentation can only be made with the agreement of the ILO. Key stakeholders can make appropriate use of the evaluation report in line with the original purpose and with appropriate acknowledgement.

9. Management arrangements and workplan

The Evaluation Manager is responsible for the overall coordination and management of this evaluation. The manager of this evaluation is Ms. Rattanaporn Pongpattana, Monitoring and Evaluation Officer at the ILO Regional Office for Asia and the Pacific (ROAP) Bangkok. The final evaluation report will be approved by the ILO's Evaluation Office.

The evaluation will be conducted by an **international consultant and a national consultant**. Desired competencies of the evaluation consultants include:

International Consultant:

Holds no previous involvement/engagement in the design and delivery of *the* ILES project
 Has minimum of ten years of experience in conducting programme or project evaluations;
 Has knowledge of, and experience in applying, qualitative and quantitative research methodologies;
 Has proven knowledge of the international labour standards, as well as the political and economic context of Pakistan
 Holds substantial working experience in implementing and /or conducting evaluation for projects pertaining to international labour and environmental standards, sustainable enterprises, and working with representative employers and workers organizations;
 Knowledge of, and experience in gender issues will be an advantage;
 Holds knowledge of the ILO's roles and mandate and its tripartite structure as well as UN evaluation norms and its programming;
 Has excellent analytical skills and communication skills;
 Has excellent report writing skills in English

See the desired competencies for national consultant in Annex 2

Both the international consultant (and national consultant, as needed) will report to the Evaluation Manager.

The project team will handle all the contractual arrangements with the evaluators, including logistic and administrative support to the evaluation throughout the process. The project team will provide all the project and non-project documents to be reviewed. The project team will also provide all assistance to the evaluators and evaluation manager in finalising the final interviews list.

All interviews by the home based IE will be done using electronic means. S/he will be supported by NE who will conduct (and provide translation support in) virtual/face-to-face meetings, and focus group discussions and survey (if any), under the IE supervision.

Timeframe, tasks and responsibilities:

Task	Responsible person	Tentative deadline
Preparation, sharing for feedback, and finalization of the evaluation TOR	Evaluation manager (EM) with inputs from the Project team	25 August 2020
Approval of the TOR	Project team and Evaluation manager	1 September 2020
Identification and selection of the evaluation consultants (one international and one national)	Evaluation manager	23 September 2020
Ex-col contracts based on the TOR prepared/signed	Project team	28 September 2020
Briefing for evaluators on the ILO evaluation policy	Evaluation Manager	28 September 2020
Review project documentation; and prepare and Submit an inception report to the EM	Evaluator	28 Sept-12 Oct 2020 12 October 2020
Consultations and interviews via Skype with the relevant ILO officials/specialists and donor	Evaluator	12 October 2020
Approve inception report, including ensuring any necessary adjustments by evaluator	Evaluation Manager	16 October 2020
Conduct online interviews/ focus groups discussions	Evaluator	19 October - 11 November 2020
Stakeholders' workshop (Online)	Evaluators, Evaluation Manager and Project team and project stakeholders (ILO Pakistan team, Donor, WWF, ILO Specialists at DWT Delhi and HQs, PSC members)	16 November 2020
Draft evaluation report prepared and submitted to the Evaluation manager	Evaluator	30 November 2020
Sharing the draft report with all the concerned stakeholders including the donor for comments	Evaluation Manager	5 December 2020
Comments on the draft report collected and consolidated, and sent to the evaluators	Evaluation Manager	20 December 2020

Finalization and submission of the report to the Evaluation manager	Evaluator	23 December 2020
Review of the final report	Evaluation Manager	26 December 2020
Submission of the final report to EVAL	Evaluation Manager	15 Jan 2021
Approval of the final evaluation report	EVAL	15 Jan 2021

Below are indicative inputs and tasks to be completed. The proposed numbers of working days can be negotiated and adjusted following the discussion of methodology in the inception phase

Tasks	Working days	Proposed timeline
Desk review of project related documents; Skype briefing with evaluation manager and the ILES Programme Manager; Prepare inception report Finalization of the evaluation methodology and mission plan, including Briefing with the evaluation manager	5 days 1 day (Inception report writing) 1 day (Presentation of inception report and inculcating the suggestions)	28 September-11 October 2020
Conduct online interviews with respondents	10 days	19 October – 11 November 2020
Stakeholder workshop	1 day	16 November 2020
Analysis of data based on desk review, interviews/questionnaires with stakeholders; draft report	7 days	16 – 30 November 2020
Finalize the report including explanations on why comments were not included. (This also includes one additional day for adding in the comments made to the initial draft before sending it to the stakeholders for review)	4 days	1 –30 December 2020
Total Days	30 days	

10. Legal and ethical matters

The evaluation will comply with UN Norms and Standards, the ILO Evaluation guidelines and UN Evaluation Group (UNEG) ethical guidelines.

11. Application

Interested applicants are requested to provide their CV, a technical and budget proposal, including their daily rate (please be noted that we follow UN DSA rate) **by 17 September 2020** to poungpattana@ilo.org cc. pamornrat@ilo.org

12. All relevant ILO evaluation guidelines and standard templates can be found accessing the following links:

1. Code of conduct form (To be signed by the evaluator)

http://www.ilo.org/eval/Evaluationguidance/WCMS_206205/lang--en/index.htm

2. Checklist No. 3 Writing the inception report

http://www.ilo.org/eval/Evaluationguidance/WCMS_165972/lang--en/index.htm

3. Checklist 5 Preparing the evaluation report

http://www.ilo.org/eval/Evaluationguidance/WCMS_165967/lang--en/index.htm

4. Checklist 6 Rating the quality of evaluation report

http://www.ilo.org/eval/Evaluationguidance/WCMS_165968/lang--en/index.htm

5. Template for lessons learnt and Emerging Good Practices

http://www.ilo.org/eval/Evaluationguidance/WCMS_206158/lang--en/index.htm

http://www.ilo.org/eval/Evaluationguidance/WCMS_206159/lang--en/index.htm

6. Guidance note 7 Stakeholders participation in the ILO evaluation

http://www.ilo.org/eval/Evaluationguidance/WCMS_165982/lang--en/index.htm

7. Guidance note 4 Integrating gender equality in M&E of projects

http://www.ilo.org/eval/Evaluationguidance/WCMS_165986/lang--en/index.htm

8. Template for evaluation title page

http://www.ilo.org/eval/Evaluationguidance/WCMS_166357/lang--en/index.htm

9. Template for evaluation summary: <http://www.ilo.org/legacy/english/edmas/eval/template-summary-en.doc>

10. the European Union “A Revised EU International Cooperation and Development Results Framework in line with the Sustainable Development Goals of the 2030 Agenda for Sustainable Development and the New European Consensus on Development” <https://ec.europa.eu/transparency/regdoc/rep/10102/2018/EN/SWD-2018-444-F1-EN-MAIN-PART-1.PDF>

Annex 1: National consultant TOR (Pakistani national only)

The reference must be made to the main evaluation TOR for the Independent Midterm Evaluation of the International Labour and Environmental Standards Application in Pakistan's SMEs (ILES) project.

The national consultant will assist the International consultant (team leader) to provide interpretation and facilitate group meeting/discussions with all stakeholders, i.e. internal ILO staff, other key stakeholders including relevant partners.

Specifically, the national consultants will be responsible:

To support international consultant in setting stakeholders' interviews and consultations.

To pro-actively provide relevant local knowledge and insights to the international consultant during the field mission.

To take part in the interviews with key stakeholders, to make notes during interviews, and to write brief reports during the interview on main observations and conclusions.

To contribute to the presentations at the stakeholder workshops to be responsible by the international consultant (team leader). The national consultant may be requested to contribute to the presentations as requested by the Team Leader (International Consultant).

To participate and jointly facilitate the stakeholders workshop.

To contribute to the report writing process as and where required.

Provide interpretation/translation, where needed.

Qualification of the national consultant:

Pakistani nationality with relevant qualifications in Law, Business Administration, International Development, Social Sciences or other relevant fields;

Holds no previous involvement/engagement in the design and delivery of the ILES project

Has minimum eight years of experience in conducting programme or project evaluations;

Has knowledge of, and experience in applying, qualitative and quantitative research methodologies;

Has proven knowledge of international labour and environmental standards, sustainable enterprises, and working with representative employers and workers organizations;

Knowledge of, and experience in gender issues will be an advantage;

Holds knowledge of the ILO's roles and mandate and its tripartite structure as well as UN evaluation norms and its programming;

Has excellent analytical skills and communication skills;

Has excellent report writing skills in English;

Completion of required UNDSS trainings i.e. BSAFE will be an advantage.

Management

The national consultant will report to the international evaluator.

Contract dates and period

To contribute to design data collection tools and conduct field data collection under the supervision of the team leader (Home based IE) and support him/her in online interviews and stakeholder workshop. The contract is for a total of 30 work days during the period of 1 October 30 December 2020.

Annex 3 List of Stakeholders to be interviewed (draft)

S.no	Organization	Position
	European Union (EU)-Donor	Present Donor focal point, Previous donor focal point, Development aid coordinator
ILO Stakeholders		
Labour Standards Component		
	MoOPHRD	Secretary OPHRD (chair of the Project Steering Committee), Focal Point from MoOPHRD for ILO ILES Project
	Employer's Federation of Pakistan (EFP) - Constituent	focal point (previous and present) for ILO
	Pakistan Workers Federation (PWF) - Constituent	Focal point for ILO from PWF
	Mutahida Labouration Front (MLF) - Constituent	Focal Point for ILO from MLF
	Director Labour, Directorate of Labour Khyber Pakhtunkhwa	Focal
	Zonal Chief, Small and Medium Enterprises Development Authority (SMEDA)	Focal Point for ILO from SMEDA KP
	Department of Labour Sindh	Focal point from Department of Labour Sindh Government Secretary, Department of Labour Sindh Joint Director, Department of Labour Sindh
	Ex Director, Department of Labour Sindh	Focal point from Department of Labour Sindh Government

	Textile and RMG sector Enterprises (enterprises implementing SCORE short course)	Focal points/ owners from enterprises belonging to textile and RMG sector implementing SCORE
	ILO Trainers implementing SCORE short course	Trainers for ILES project implementing SCORE short course
	ILO Trainers/ Consultants for OSH Training/ follow up	Trainers for ILES project implementing OSH training
	Pakistan Institute of Labour Education and Research	Focal point for ILO from PILER
	ILES International and National Consultants for Policy level work	ILO- External Consultants for ILES for Policy level work
	ILO	Ex International Labour Standards Specialist - ILO DWT Delhi, India international consultant for the SCORE
	ILO DWT Delhi, India	Occupational Safety and Health Specialist, Deputy Director - ILO DWT Delhi, India Sr Specialist on Employers' Activities Specialist on Workers' Activities
	ILO	Enterprise Specialist - ILO DWT Delhi, India
	ILO	Senior Programme Officer - ILO Pakistan Programme Analyst - ILO Pakistan Country Director - ILO Pakistan

WWF Stakeholders		
Private Sector		
	Pakistan Readymade Garments Manufacturing and exporter Associations	Director Training Institute
	Pakistan Hosiery Manufacturers Association (PHMA)	Secretary
	All Pakistan Textile Mills Association (APTMA)	General Secretary
	Faisalabad Chamber of Commerce and Industries (FCCI)	Head of R&D Cell
	Pakistan Tanners Association (PTA)	Ex. Chairman PTA
	Pakistan Tanners Association (PTA) North	Secretary
	Towel Manufacturers Association of Pakistan	Secretary General
	Korangi Association of Trade & Industry (KATI)	Secretary
	Other sector specific organizations (RMG) of employers and employees and leading Chambers of Commerce & Industries	To be identified
	UNIDO	Project Coordinator in Karachi
	Sialkot Tannery Zone Association	CEO, Project Director of Sialkot Tannery Association
	Pakistan Leather Garments Manufacturers & Exporter Association (PLGMEA)	Patron PLGMEA
	Archroma Pakistan	Sr. Manager Communication and HR
	Alliance for Water stewardship (AWS)	Country Coordinator Pakistan
Public Sector		
	Ministry of Climate Change	Director Secretary Climate Change Ministry (or Joint Secretary)
	Sindh Environmental Protection Agency (SEPA)	Director General, Secretary
	Planning and Development Department Sindh	Chief Environment and Climate Change
	Textile Commissioner Office	Deputy Director
	Planning and Development Board Punjab	Chief Environment
	Environmental Protection Agency, Punjab (EPA Punjab)	Director General Director Labs. District Officer Environment

	State Bank of Pakistan	Director IH&SMEFD, Deputy Director IH&SMEFD
	Pakistan Council of Research on Water Resources (PCRWR)	Regional Director
Research and Academia		
	Mehran University Jamshoro Sindh	Director USPCASW, Assistant Professor
	NED University Karachi	Professor
	Dawood University of Engineering & Technology Karachi	Chairman Energy and Environment Department
	GCWU Sialkot	Chairperson Botany Former Director ORIC
	Department of Fibre and Textile Technology, University of Agriculture	Chairman
	National Textile University Faisalabad	Rector/Head of University
	Lahore University of Management Sciences	Executive Director, Center for Water Informatics & Technology (WIT)
Consultants		
	CPI	Director Projects/Consultant for WWF CEO
	Saleem Alam & Co.	Env. Lawyer & Consultant for WWF
	go4more.global	Consultant for WWF
	Adelphi	Consultant for WWF
	National University of Science and Technology (NUST)	Consultant for WWF

Annex B. List of persons interviewed

ILO-ILES Project, Pakistan
List of Stakeholders Interviewed

Stakeholder Group	Stakeholders Interviewed	Total	Male	Female
Donors	1. Mr. Ulrich Thiessen Present Donor focal point European Union (EU)	1	1	
ILO related Personnel and Stakeholders				
ILO Pakistan Country Office team and other ILO Project Managers	1. Ms. Ingrid Christensen, Country Director 2. Mr. Saloman Rajbanshi, Programme Analyst 3. Mr. Saad Gilani, Sr. Programme Officer 4. Mr. Saghir Bukhari, Sr. Programme Officer 5. Mr. Aftab Ahmed, Operations Officer Focus group 6. Mr. Faisal Iqbal, 7. Mr Ijaz Ahmad, 8. Mr. Abid Niaz,	8	7	1
ILO Consultants and Specialists	<i>ILES International and National Consultants for Policy level work</i> 1. Mr Alan Boulton, ILO- External Consultant 2. Mr. Conor Cradden, ILO- External Consultant 3. Mr. Jayantha, International consultant for the SCORE, ILO Consultant <i>ILO Specialists</i> 4. Mr. Tsuyoshi Kawakami, Occupational Safety and Health Specialist – ILO DWT Delhi, India 5. Mr. Kelvin Sergeant, Enterprise Specialist – ILO DWT Delhi, India 6. Ms. Janika Simon, Programme and Operations Specialist, BETTERWORK, Geneva 7. Mr. Ravindra Peiris, Employers' activities Specialist 8. Mr. Ahmmed, Syed Sultan Uddin, Workers' Activities Specialist 9. Mr. Satoshi Sasaki, Deputy Director – ILO DWT Delhi, India	9	8	1
ILES - Component I Management Team	1. Ms. Caroline Bates, Project Manager 2. Ms. Sadia Hameed, Senior Project Officer 3. Mr. Ahmad Ullah Qazi, Project Officer, Monitoring, Evaluation and Communications 4. Mr. Kazim Shuaib, Project Officer, Khyber Pakhtunkhwa (KPK) 5. Mr. Naeem Khalid, Project Officer, Sindh and Baluchistan	5	3	2
WWF Personnel				
WWF Personnel	1. Sohail Ali Naqvi, ILES Project Manager	3	3	

	<ol style="list-style-type: none"> 2. Arjmand Qayyum, ILES coordinator 3. Dr. Masood Arshad, Senior Director - Water, Food and Climate 			
WWF Consultants	<ol style="list-style-type: none"> 1. Mr. Shafqat Ullah, Cleaner Production Institute (CPI), Director Projects 2. Mr. Azher Uddin Khan, Cleaner Production Institute (CPI), CEO 3. Mr. Ahmad Rafay Alam, Saleem Alam & Co. Env. Lawyer 4. Dr. Reiner Hengstmann, go4more.global 5. Mr. Jonas Restle-Steinert, Adelphi 6. Dr. Sher Jamal, National University of Science and Technology (NUST) 	6	6	
Employer's, Industrial Associations, Enterprise Manager				
Employer's, Industrial Associations, Enterprise Manager	<ol style="list-style-type: none"> 1. Mr. Fasi ul Karim Siddiqui, Previous focal point for ILO from Employer's Federation of Pakistan (EFP) - Constituent 2. Dr. Kamran Sandhu, Pakistan Readymade Garments Manufacturing and exporter Associations (PRGMEA), Director Training Institute 3. Muhammad Ayub, Pakistan Hosiery Manufacturers Association (PHMA), Secretary 4. Mr. Kamran Habib, Pakistan Tanners Association (PTA), Ex. Chairman 5. Mr. Fahim Ahmad, Pakistan Tanners Association (PTA) North, Secretary 6. Mr. M. Muzamil Hussain, Towel Manufacturers Association of Pakistan, Secretary General 7. Mr. Ehtisham Gillani, Sialkot Tannery Zone Association, CEO 8. Mr. M. Atif, Sialkot Tannery Zone, Project Director of Sialkot Tannery Association 9. Ms. Shahana Kaukab, Archroma Pakistan, Sr. Manager Communication and HR 10. Ms. Nazia Mughal, Soorty Textile 11. Mr. M. Azeem, US Denim 	11	9	2
Workers Federation's				
Worker's	<ol style="list-style-type: none"> 1. Mr. Zahoor Awan, focal point for ILO from Pakistan Worker's Federation (PWF)- Constituent 2. Mr. Chaudary Saad Muhammad, focal point for ILO from PWF Punjab - Constituent 3. Mr. Razim Khan, focal point for ILO from PWF KP - Constituent 4. Mr. Liaquat Bacha, focal point for ILO from Mutahida Libration Front (MLF) 5. Mr. Saeed Khan, focal point for ILO from Insaf Worker's Federation (IWF) 	6	5	1

	6. Ms. Zehra Khan, Home Based Women Workers' Federation				
Government					
Component Government Counterparts	1	1. Ms. Atifa Raffat, focal point from MoOPHRD for ILO ILES Project, Joint Secretary, Ministry of Overseas Pakistanis and Human Resource Development (MoOPHRD) 2. Mr. Rashid Khan, focal Point for ILO from SMEDA, Zonal Chief, Small and Medium Enterprises Development Authority (SMEDA) 3. Mr. Ali Ashraf Naqvi, focal point from Department of Labour Sindh Government, Joint Director, Department of Labour Sindh 4. Mr. Gulfam Nabi, focal point from Department of Labour Sindh Government, Ex Director, Department of Labour Sindh (Presently working as a consultant to the Department of Labour Sindh) 5. Mr. Irfan Ullah Khan, focal point, Director Labour, Directorate of Labour Khyber Pakhtunkhwa	5	4	1
Component Government Stakeholders	2	1. Mr. Asif Sahibzad, Ministry of Climate Change, Director 2. Mr. Waqar Hussain Phulpoto, Sindh Environmental Protection Agency (SEPA) 3. Mr. Nusrat Gill, Planning and Development Board Punjab, Chief Environment 4. Mr. Ali Abbas, Environmental Protection Agency, Punjab (EPA Punjab, Director Labs. (He is one of focal persons EPD Lahore). 5. Mr. Shaukat Hayat, Environmental Protection Agency, Punjab (EPA Punjab, Deputy Director Labs (He has recently transferred to Lahore Head office but he was part of Project Activities in Faisalabad when he was district officer Environment at Faisalabad. 6. Mr. Zarak Khan, State Bank of Pakistan, Deputy Director IH&SMEFD) 7. Mr. Zameer Ahmad Somroo, Pakistan Council of Research on Water Resources (PCRWR), Regional Director(Retired on 30th September as Director General.	7	7	
Academia					
Academia		1. Dr. Asad Farooq, Department of Fibre and Textile Technology, University of Agriculture, Chairman 2. Dr. Yasir Nawab, National Textile University Faisalabad, Rector/Head of University 3. Dr. Zareen Fatima, GCWU Sialkot, Chairperson Botany Former Director ORIC	3	2	1
Other Stakeholders (other organizations, Brands)					
Other Stakeholders (other		1. Ms. Maheen Malik, Alliance of Water Stewardship (AWS), Country Coordinator (WWF)	6	3	3

organizations, Brands)	2. Ms. Romina Kochius, Improvement of labour and social standards in Pakistan's textile industry GIZ, (ILO) 3. Mr. Umar Bin Asad, Li and Fung, Buyer's Forum (ILO) 4. Mr. Omair Dawood, H&M (WWF) 5. Mr. Zulfikar Khan, Deputy Director (ILO) 6. Ms. Zeenia Shaukat, researcher (ILO)			
ILO- SCORE Training				
SCORE Trainers	1. Mr. Ashad Ali, Lead trainer (certified) 2. Mr. Adnan Latif, Lead trainer (certified) 3. Mr. Ijaz ul Hasan, Lead trainer (certified) 4. Ms. Bilquis Yasmeen, Lead trainer 5. Mr. Saif ur Rahman, Associate trainer	5	4	1
ILO SCORE Factory/Enterprise <i>Managers</i>	1. Mr. Mustafa Hasnain, ICL-Midas Safety 2. Mr. M. Anwar, Amna Ashraf Apparel 3. Mr. Mohsin Ali Ghee Wala, Selimpex International	3	3	
ILO SCORE Factory/Enterprise <i>Workers-(Male)</i>	1. Mr. M. Asad Mohiuddin, ICL-Midas Safety, Karachi 2. Mr. M. Anees, Selimpex International	2	2	
ILO SCORE Factory/Enterprise <i>Workers-(Female)</i>	1. Ms. Komal Khan, Selimpex International, Quality Auditor	1		1
ILO- OSH Training				
OSH Trainer	Mr. Shakir Hussain, Trainer OSH	1	1	
ILO OSH training Factory/Enterprise <i>Managers RMG/textile/marble focused group</i>	Lahore 1. Mr. Abdul Saboor, Taiga Apparel, MTO Compliance HR 2. Mr. M. Ibrahim Sabir, Advance Fashion Pvt. Ltd. (stylers intl. Pvt. Ltd.), Deputy Manager Compliance 3. Mr. Naeem Anwar, Knitexx Apparel, CEO 4. Mr. Sayed Farrukh, Widezone Intl. Co. Quality Manager Karachi 5. Mr. M. Atif Tauqeer, M.N.Textile, 6. Mr. Shahzad Ahmed, Unibro	6	6	
ILO OSH training Enterprise <i>Workers-(Male)</i>	Lahore 1. Male worker, A.R.Usman 2. Male worker, Widezone Intl. Co. Karachi 3. Male worker, Unibro, HR compliance	3	3	
ILO OSH training Enterprise <i>Workers-(Female)</i>	Karachi 1. Female worker, Unibro	1		1
WWF- Enterprises Group				

WWF Managers SEMP/AWS Karachi	Textile -	1. Talha Zahur, Noor Leather, Director 2. Mr. Zeeshan Ali, Rajby Industries – Textile, Sr. Manager Compliance 3. Mr. Faheem Ahmed, Artistic Milliners Textile, Sr. Manager Compliance 4. Mr. Anees Larik, Ebrahim Textile, Sr. Manager Engineering 5. Mr. Mansoor Akram, Khaas TYannery, GM Engineering 6. Mr. Zeeshan Mazahir, AGI Denim – Textile, Manager EHS	6	6	
WWF Managers –SEMP Sialkot	Leather	1. Mr. Abdullah Cheema, Leather Tannery, Director 2. Mr. Zahid Rafique, Sheikh of Sialkot, Compliance Manager 3. Mr. Waqar Ahmad, NazranPvgt. Ltd. Manager Compliance 4. Mr. Muhammad Noman, KM Ashraf Pvt. Ltd. General Manager	4	4	
WWF Managers SEMP/AWS Lahore	Textile -	1. Mr. Mazher Qayyum, Naveena Denim, Director Technical 2. Mr. Faisal Khalil, Shafi Texcel, Sr. Manager HR & Admin. 3. Mr. Imran Hassan, Eastern Leather, Manager Quality 4. Mr. Arshad Yousafzai, ZKap and Comfort knitwear, Manager Compliance 5. Mr. Ahmed Farooq, Masood Textile Mills, Sr. Manager Mechanical 6. Mr. Maqbool Ahmed, K&Ms, manager utilities	6	6	
Total			108	93	15

Annex C. List of documents consulted

ANNUAL REPORTS

ILES - 1st Narrative Report, 30 Sep 2016 – 31 Aug 2017 – year 1

ILES - 2nd Narrative Report, 01 Sep 2017 – 30 Sept 2018 – year 2

ILES - 3rd Narrative Report, 01 Oct 2018 – 30 Sep 2019 – year 3

ILES - 4th Narrative Report, 01 Oct 2019 – 30 Sept 2020 – year 4

WORKPLANS

ILES - Workplan 2016-2017 - year 1

ILES - Workplan 2017-2018 - year 2

ILES - Workplan 2018-2019 - year 3 (Labour Component)

ILES- WWF Workplan Sep 2018 - Nov 2019 year 3

ILES - Workplan 2019-2020 – year 4

ILES - Workplan Work Plan 2020-2021- year 5

OTHER PROJECT REPORTS

SCORE (Sustaining Competitive and Responsible Enterprises) monthly/Final Report June-August 2019.

Inception Report *Drafting of National Labour Protection Framework (Implementation Framework for Baluchistan, KP & Sindh)*, by Dr. Javaid Gill.

13th Pakistan Buyers' Forum Meeting, *ILO, IDH, IFC- Dutch Embassy in Pakistan, July 11, 2019.*

Reports/events for Developing and Conducting Advocacy Campaign(s) *Based on the Findings of Research Studies with major Engagement of Journalists, Academia on World Water Day, Earth Day 2019.*

Media briefing session *on ILES, about the services WWF Pakistan is offering to industries in order to comply with International Labour and Environmental standards and how these implementation can lead to sustainable economic growth in Pakistan, July 17, 2019*

Media Exposure Visit *at Chokera, Faisalabad, to highlight the importance of floating wetlands on national level, Aug 06, 2019.*

Public Sector Stakeholders Meeting for Sharing of post 18th Amendment Inter provincial experience of EPAs: *Capacity Building of relevant environment national and provincial*

authorities on effective coordination, with regards to the 18th amendment through meetings. April 30, 2019.

Capacity Building Session on Environmental Legislation in Pakistan, July 26, 2019

Workshop on Smart Environmental Practices Management Practices SEMPS, National Textile University Faisalabad, July 30, 2019.

Capacity Building Session for Legal Fraternity on Compliance to National and International Law, Standards and Obligations along with Associated Economic Aspects, Aug 27, 2019.

Capacity Building Session of Relevant Stakeholders (Government and Industry) on EU Standards Pertinent to the Textile and Leather Sectors, Aug 20, 2019.

Capacity Building Session for Enterprises on Corporate Social Responsibility: *Engaging Private Sector for Incorporating Environmental Compliance in their CSR, April 24, 2019.*

Building Capacity of Financial Institutions on Environmental Issues and Provide Support in Developing Green Credit Guidelines; Green Financing for SMEs in Pakistan: Challenges, Opportunities and Way Forward, Feb 28, 2019.

3rd Session on City-Wide Partnership for sustainable Water use and Stewardship, Mar 28, 2019.

4th Session on City-Wide Partnership, Jul 28, 2019. Session on City-Wide Partnership for Water Stewardship and sustainable Water Use, Aug 06, 2019.

Workshop on Leather Working Group (LWG) Environment Stewardship Protocol *in collaboration with Sialkot Tannery Association & UNIDO, May 07, 2019*

Workshop on Resources Efficiency (Best available techniques/ Smart Environmental Management Practices) Leading to Compliance of LWG in Sialkot, Pakistan, Sep 18, 2019.

Capacity Building Session on Leather Working Group (LWG) Compliance & Protocol with Leather Industries of Karachi, Sep 23, 2019

Capacity Building Session of Supply Chain Workers on Water and Energy Efficiency in Leather Industries of Karachi, Aug 29, 2019

Workshop with International Alliance for Water Stewardship (AWS) Expert for Certification, July 23-25, 2019.

Half-Day Session on Alliance for Water Stewardship (AWS) Certification in Textile and Leather Sector, Aug 07, 2019

Capacity Building Session on Smart Environmental Management Practices (SEMP) for Public Sector, 15 August 2018

Study Finding Session with Public Sector Stakeholders, 16 August, 2018

Workshop for Public Sector *on Challenges Pertaining to Energy Stewardship, Management of Hazardous Chemicals, and Pollution Mitigation to Support Implementation of Environmental Standards, Oct 18, 2018.*

An AWS accredited Training Programme for Sustainability and Water Management Professionals, Nov 23, 2018.

Stakeholders Consultative Session: *Compliance to Mainstreaming of MEAs within National Environmental Standards Strengthened in Textile and Leather Sector, WWF-Pakistan, Jan 25, 2018*

Capacity Building Session for Stakeholders Compliance to National and International Environmental Laws, Standards and Obligations along with Associated Economic Aspects, Feb 27, 2018

Workshop on Smart Environmental Management Practices (SEMPs) in Textile Value Chain, 28 February 2018

National Steering Committee Meeting, 15 March 2018

National Consultative Workshop on the Submission of Pending Instruments to the Competitive Authority, 28 March 2018

ILO/SCORE Scoping Mission Report, conducted by Mr. Jayantha R de Silva, SCORE Global Expert Trainer/ International Enterprise Specialist, ILO - March 2018

Seminar on Industrial Alliance for Water Stewardship (AWS), 13 March 2018

Workshop for Industrial Workers on Compliance of MEAs and Resource Efficiency, WWF and Nazran (pvt.) Ltd. Sialkot, 26 September 2018

OSH Workshop 23-24 Nov, 2017

Briefing Session with Media Outlets, Karachi 28 Sep 2017

Activity No 1.2.3.4.5 Briefing Sessio with Media Outlets, 10 October 2017

Framework: Provincial Implementation Framework for Promotion of Labour Protection in line with International Labour Standards- 12.10.2018 and NPLF-Sindh post consultation version

SURVEY/STUDIES/CONSULTATIONS

SCORE Customer Satisfaction Survey Batch 1-2 Enterprise and Trainers - Sep 2019

ILO Risk Matrix - *Table summarizing perceived risk and potential mitigation strategies for a Better Work Programme in Pakistan*

Contractual and Outsourced Labour in Sindh: issues and challenges

ILES-EU *Sustaining Competitive and Responsible Enterprises* (SCORE) short course Intervention in Texmark and Artistic Milliners from Nov 2018 to Jul 2019.

Inspection and Calibration of Vehicular Emission Analyzers

Capability Building Session Environmental Compliance and Environmental Laws with Government and Private Sector Stakeholders, Aug 05, 2019

Scoping Study on EU Standards Pertinent to the Textile and Leather Sectors, *WWF- GO4MORE, Dr. Reiner Hengstmann* – January –April 2019

Sustainability of Taunsa Conservation Centre and Resourcing Indus River Dolphins, *consultant Muhammad Munawar Iqbal, Incharge Taunsa Conservation and Information Centre* July 11- November 30 2019,

Situation Analysis of Water Resources in Faisalabad city, Dr. Sher Jamal, professor Environmental Engineering, National University of Science and Technology (NUST)

Water Reuse Initiative at Jamia Mosque Model Town, *prepared by Hamna Aamir and Sajjad Ahmad, Freshwater programme WWF-Pakistan.*

International Labour & Environment Standards Application in Pakistan SMEs (ILES), Feb 2019, *ILES Audit Report by Al-Haram Textile ILES-FSD-41-TP, Central Production Unit (CPI)*

International Labour & Environment Standards Application in Pakistan SMEs (ILES), July 2017, *ILES Audit Report by Klash Private Limited – Dyeing & Finishing Unit (KDH) ILES-FSD-TP-01, Central Production Unit (CPI)*

Life Cycle Assignment Report

International Labour & Environmental Standards Application in Pakistan SMEs (ILES), Feb 2019, *ILES Audit Report, Nirma Textile (pvt) Ltd.(processing) ILES-FSD-04-TP*

International Labour & Environmental Standards Application in Pakistan SMEs (ILES), May 2019, *ILES Sample Post Audit Report, Comfort Knitwears (Pvt.) Ltd. Unit-1*

Seminar on Industrial Waste Water in house Primary Treatment at very Affordable Cost, Nov 17, 2018

Pilot of Non-Chemical Industrial and Municipal Waste water Treatment System for Reuse of Wastewater in Agriculture, *conducted by Water Care Services Pakistan (WCSP) BioCleaner, A Green Revolution, May 23, 2019*

Cleaner Production Towards a Sustainable Transition for Korangi Leather Area Karachi. Aug 06, 2019 *ILES event Report.*

Map Textile and Leather Processing Supply Chains of Raw Material, Processes, Retailers and Export

Capacity Building Session of Supply Chain Workers on Water and Energy Efficiency in Leather Industries of Karachi, Aug 29, 2019

Situational Analysis of National Environmental Laws and Policies, Non-Compliance of these laws, Resource Efficiency Issues and Gaps in Implementation of Enforcement: *by Ahmad Rafay Alam, reviewed by Syed Mujtaba Abbas Zaidi and Suniya Taimour*

Economic Impact and Health Implications of Non-Compliance of the Leather and Textile Industry, *by Junaid Ahmed Noor, Hamza Ijaz and Ali Zafar, reviewed by Syed Mujtaba Abbas Zaidi and Suniya Taimour*

Review of Existing Environmental Laws and Regulations in Pakistan as well as focus on the Impacts of Non-Compliance of such Laws on Various Sectors including Health, Business Development, and Research Loss: *conducted By Sardar Aasif Sial, reviewed by Syed Mujtaba Abbas Zaidi and Suniya Taimour*

Vulnerability Risk Assessment to gauge Impact of Inefficient and Unsustainable Practices in the Leather and Textile Sectors – *by Dr. Asad Farooq, reviewed by Dr. Andre' Matthes, Syed Mujtaba Abbas Zaidi and Suniya Taimour, 2018*

Capacity Building Session for Financial Institutions on Environmental Issues and Green Finance, Karachi, 19 July 2018

Stakeholders Workshop on Situational Analysis of Water Resources of Faisalabad, 10 July 2018

Annex D Other ILO Pakistan projects 2016-2020

<p>Eliminating child labour and forced labour in the garment value chain – an integrated approach</p> <p>Goal: Promote compliance with core ILO labour standards in the garment value chain with a focus on Decent Work in cotton production. Budget allocation: USD 7,581,008 split between Burkina Faso, Mali, Pakistan and Peru, and a Global component. Implementation period: 2018-2022</p>
<p>Enhancing Decent Work, Transparency and Traceability for Sustainable Garment Value Chains</p> <p>Goal: Supports the implementation of Better Work's strategy 2017-2022 with contributions to the Better Work Global programme, the Better Work country programmes in Bangladesh and Vietnam, and the potential expansion of a Better Work programme to three additional countries (including Pakistan) Budget allocation: EUR 12,675,000 Implementation period: 2020-2022</p>
<p>Global action to improve the recruitment framework of labour migration in Pakistan</p> <p>Goal: Contribute to the development of practical guidelines on fair recruitment to assist ILO Member States, social partners, labour recruiters and other stakeholders in developing labour recruitment laws and regulations in compliance with international human rights and labour standards Budget allocation: USD 54,625 Implementation period: 2017- 2021</p>
<p>Sustaining strengthened national capacities to improve ILS compliance and reporting</p> <p>Goal: Improving the application of the 8 fundamental ILO conventions in the following ILO beneficiaries of the EU preferential GSP+ scheme Budget allocation: USD 212,618 (covers Mongolia and Pakistan as well as in members of the EU Central America Association Agreement, El Salvador and Guatemala) Implementation period: 2018- 2020</p>
<p>Support GSP+ beneficiary countries to effectively implement ILS and comply with reporting obligations Pakistan</p> <p>Goal: support the application of ILO's Fundamental Conventions and Human Rights in Pakistan by strengthening the institutional capacity of the national and provincial Governments to facilitate the enactment of relevant labour laws and effectively enforce existing relevant labour laws Budget allocation: USD 159,400 Implementation period: 2016- 2019</p>
<p>Sustaining GSP + Status by strengthened national capacities to improve ILS compliance and reporting – Pakistan</p> <p>Goal: support the application of ILO's Fundamental Conventions and Human Rights in Pakistan by strengthening the institutional capacity of the national and provincial Governments to facilitate the enactment of relevant labour laws and effectively enforce existing relevant labour laws Budget allocation: USD 216,620 Implementation period: 2015- 2018</p>

Source: ILO Development Cooperation Dashboard

Other donor-funded ILO projects with objectives to improve labour compliance in the textile and leather sectors/value chains which were active over the period 2016 to 2020 included:

- More and Better Jobs through Socially Responsible Labour Practices in Pakistan: MNE Declaration project in the Sialkot Sports Goods Manufacturing Sector (Japan, USD 126,000)
- Promoting fundamental principles and rights at work in cotton supply chain (Inditex, USD 495,149 spread over China, India, Mali and Pakistan)
- Labour standards in global supply chains - a programme of action for Asia and the garment sector (Germany, USD 5,570,899 ending 2019, covered Cambodia, Indonesia and Pakistan with a regional component)
- Strengthening the policy and legislative environment for home-based workers in Pakistan (UNDP, USD 99,000 divided between three UN agencies)
- Strengthening Labour Inspection system for Promoting Labour Standards and ensuring workplace compliance in Pakistan (Netherlands, USD 1,280,663, ended 2019)
- ILO- Pakistan Textiles Exporters Association (PTEA) Collaboration for Labour laws Compliance in Textile (PTEA, USD 55,000, ended 2018)
- Support the government on improved application of ILS and support constituents to develop responsible workplace practices in the garment and textile industries (ILO core funding, USD 398,121, ended 2018)

Annex E Good Practices

Good Practice 1

ILO Emerging Good Practice

Project Title: International Labour and Environmental Standards Application in Pakistan's SMEs (ILES)

Project TC/SYMBOL: PAK/16/03/EUR/PAK/16/04/EUR

Name of Evaluator: Sandy Wark – Naila Usman

Date: Sept. 2020 – Feb 2021

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element	Text
<p>Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)</p>	<p>Building a business case for compliance: In both its labour and environment component, ILES intended to capitalize on its enterprise support activities to build a business case for compliance. To date, the environment component is well advanced documenting the business benefits of environmental upgrades and practices within progressive enterprises.</p> <p>Based on ILES' draft business case report of the case for progressive industries, assisted enterprise reported annually savings of 679,456 cubic meters of water, 4.45 million kilowatts electricity, 4.4 million cubic meters of gas, 194 tons of wood and 5,154 ton of coal.</p> <p>Although not as well documented, the labour component's OSH training activity demonstrated that enterprises could improve workplace safety through no and low-cost changes that likewise improve productivity.</p> <p>ILES, an ILO-led partnership with WWF, aims to help ILO tripartite constituents and other stakeholders to strengthen compliance with national and international labour and environmental laws and standards to sustainably increase the country's competitiveness while promoting inclusive development. ILES proposes to promote compliance with international labour and environmental standards through two sub-objectives:</p> <ol style="list-style-type: none"> 1. To assist public sector institutions to improve the enforcement of existing legislation and compliance with international labour and environmental standards in Pakistan as well as define new laws where necessary; and 2. To assist textile and leather sector enterprises to institutionalize the implementation of, and compliance with international labour and environmental standards.

Relevant conditions and Context: limitations or advice in terms of applicability and replicability	<p>In order to build a business case, good baseline and endline data are needed. The project should establish in advance what are the indicators on which it will gather data to prove the business case.</p> <p>Although SCORE has developed a tool for this, the ILES project experienced problems in data collection that made documenting improvements more difficult.</p>
Establish a clear cause-effect relationship	<p>Within the environment component, factory managers testified that when they were able to demonstrate making an investment in cleaner and more efficient technology, it was relatively easy to convince the factory owner to make the investment.</p>
Indicate measurable impact and targeted beneficiaries	<p>On the labour side, a representative of GIZ's productivity focused programme in Punjab (not an ILO project) highlighted that the project has been able to facilitate greater formalization of the textile workforce by demonstrating the importance of building and keeping a skilled workforce. The project manager indicated enterprise managers realized that if they were investing in building the skills of their operators, it would be advantageous to issue formal work contracts and pay benefits.</p>
Potential for replication and by whom	<p>ILO programme managers implementing enterprise level support projects aimed at improving compliance and productivity.</p>
Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	
Other documents or relevant comments	<p>Increase strategic coherence between enterprises and policy level interventions, Develop synergies with productivity enabling environment stakeholders/programmes using mainstreaming approaches to promote compliance and improved practices.</p>

Good Practice II

ILO Emerging Good Practice Template

Project Title: International Labour and Environmental Standards Application in Pakistan's SMEs (ILES)

Project TC/SYMBOL: PAK/16/03/EUR/PAK/16/04/EUR

Name of Evaluator: Sandy Wark – Naila Usman

Date: Sept 2020 – Feb 2021

The following emerging good practice has been identified during the course of the evaluation. Further text can be found in the full evaluation report.

GP Element	Text
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<p>Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)</p>	<p>Mobilizing workers in factory improvement initiatives: In both ILES OSH training and SCORE programmes, involving workers in factory improvements was an important aspect of the intervention. For example, according to an ILO specialist, worker involvement is OSH promotion is important, noting the absence of worker involvement is often a gap in external audit-led approaches, <i>“This is why I say many companies have good drinking water facilities and fire facilities...but they are not always convenient to workers. Issues that are not covered by the audit tend to be missed.”</i> Under ILES, the ILO specialist is currently working on an OSH handbook for Workers’ Organizations and is scheduled to deliver related training starting next year (in 2021).</p> <p>ILES, an ILO-led partnership with WWF, aims to help ILO tripartite constituents and other stakeholders to strengthen compliance with national and international labour and environmental laws and standards to sustainably increase the country’s competitiveness while promoting inclusive development. ILES proposes to promote compliance with international labour and environmental standards through two sub-objectives:</p> <ol style="list-style-type: none"> 3. To assist public sector institutions to improve the enforcement of existing legislation and compliance with international labour and environmental standards in Pakistan as well as define new laws where necessary; and 4. To assist textile and leather sector enterprises to institutionalize the implementation of, and compliance with international labour and environmental standards.
<p>Relevant conditions and Context: limitations or advice in terms of applicability and replicability</p>	<p>One of the relevant conditions for involving workers in the OSH training was deciding to hold most of the training sessions in the factories themselves. While the first session was held in a hotel, after noticing that this venue limited the number of workers who could participate, the ILO OSH specialist preferred to shorten the workshop but hold them in the factories. Moreover, the techniques used in the training – touring the factory and making an action list, encouraged worker participation.</p> <p>Similarly, the SCORE programme is developed in factories and required the formation of factory improvement committees with include workers in their membership.</p>
<p>Establish a clear cause-effect relationship</p>	<p>One factory manager highlighted that including workers in improvement planning gave them a voice: <i>“The people who were engaging never had the opportunity to have a voice. Suddenly they are coming to the meeting with practical ideas, which made us realize that there were a lot of assets on the floor.”</i> One worker concurred, <i>“We used to be terrified of top management, but this ten-minute meeting gave us voice and reduced our communication gap.”</i></p>
<p>Indicate measurable impact and targeted beneficiaries</p>	<p>Based on participant feedback, SCORE has contributed to dialogue and cooperation between management and workers leading to some productivity improvements. Several managers highlighted worker/management cooperation as a positive outcome of participation.</p>

Potential for replication and by whom	Worker involvement in factory improvement plans can be replicated in almost all factory level compliance/productivity-oriented ILO programmes.
Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	
Other documents or relevant comments	

Annex F Lessons Learned

ILO Lesson Learned	
<p>Project Title: International Labour and Environmental Standards Application in Pakistan's SMEs (ILES) Project TC/SYMBOL: PAK/16/03/EUR/PAK/16/04/EUR</p> <p>PAK/16/03/EUR</p> <p>PAK/16/04/EUR</p> <p>Name of Evaluator: Sandy Wark , Naila Usman Date: Sept 2020-Feb 2021</p> <p>The following lesson learned has been identified during the course of the evaluation. Further text explaining the lesson may be included in the full evaluation report.</p>	
LL Element	Text

<p>Brief description of lesson learned (link to specific action or task)</p>	<p>Importance of a thorough project design and review process.</p> <p>In 2017/18, the labour component underwent a lengthy strategy redefinition following an ILO-mandated evaluability assessment, which found weaknesses in the original intervention strategy including significant overlap with other ILO projects and some inconsistencies in resource allocations. Following the assessment, ILO updated its logframe, provided more detail on enterprise level strategies and narrowed planned policy and capacity building interventions somewhat to focus on four priority topics: informality, labour protection frameworks, Occupation Safety and Health (OSH) and minimum wage setting mechanisms.</p> <p>While the evaluability assessment is a safeguard to improve the project intervention strategy in its inception phase, it is not meant to be a “redesign” exercise or to be a cause of a significant delay in project implementation. More generally, project documents should answer basic who, what, where, when, how and how much questions about what the project intends to do rather than describing broad areas of work and suggesting existing ILO methodologies without detailing how they will be adapted to a particular context.</p>
<p>Context and any related preconditions</p>	<p>The lengthy project revision and budget realignment in the project inception stage suggests that ILO project design review processes should be strengthened. The nature of some of the required changes – ensuring multiple ILO projects did not duplicate the others’ efforts and adequately budgeting enterprise level activities are basic issues that should be caught during the initial project document review stages.</p>
<p>Targeted users / Beneficiaries</p>	<p>ILO personnel involved in reviewing and validating project documents: country office personnel, Pardev and others.</p>

<p>Challenges /negative lessons - Causal factors</p>	<p>Reasons given for the lack of a detailed project document include:</p> <p>The project was sole-sourced, in other words the Country Office did not have to compete for the project. Although not stated explicitly by key informants during the evaluation, the former may partially explain why the project design and review process was not sufficiently rigorous to catch some of the design issues.</p> <p>According to ILO Country Office personnel, when the ILES Project was designed in 2015, Labour Standards were relatively high on the agenda of the Government. Nevertheless, the design team highlighted that the project design was complicated by the fact that government counterparts were relatively new to labor affairs. The Ministry of Overseas Pakistanis & Human Resource Development, previously as Ministry of Labour, had only been in place for two years. In addition, labor affairs had been relatively recently devolved to the Provincial government.</p>
<p>Success / Positive Issues - Causal factors</p>	
<p>ILO Administrative Issues (staff, resources, design, implementation)</p>	