



Promoting decent work and capacity building for labour ministries, labour inspections and social partners to advance international labour standards and responsible business conduct through sustainable trade and investments in Southern Africa (SUSTAIN)

ILO TC/SYMBOL: RAF/24/01/EUR

Evaluation type: Project

Evaluation timing: Mi-parcours

Evaluation nature: Interne

Countries: Botswana, Lesotho, Namibia and South Africa including subregional activities with the Southern African Development Community (SADC)

Résultat(s) du P&B: Ouctome 4, Output 4.2

ODD(s): 8

Date when the evaluation was completed by the evaluator: 22 May 2026

Administrative Office: DWT-Pretoria

Technical Office: ENTERPRISES

Agencies involved if joint evaluation: NA

Project duration: November 1, 2024 - February 28, 2027

Donor and budget: European Commission, DG-Employment, 1 176 740.00 EURO

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Evaluation budget: 8000\$

Key words: Standards, Labour Inspection, Trade, Responsible Business Conduct

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Executive Summary

Background

Funded by the European Union, the SUSTAIN project seeks to maximize decent work outcomes of trade and investment by promoting international labour standards and responsible business conduct (RBC).

The project responds to key trade and investment trends in Southern Africa, including the growing importance of sustainability clauses in trade and investment agreements, human rights and environmental due diligence legislation in the European Union, the need for quality and sustainable development outcomes, and alignment with national development priorities. It is implemented in a volatile trade and investment landscape, but also in a context of emerging opportunities linked to new markets, economic diversification, industrial development, and the operationalization of the AfCFTA.

The project development objective is to advance decent work, social justice and inclusive economic growth through respect for international labour standards and the promotion of RBC within trade and investment policy and practice.

The SUSTAIN project is under implementation and has begun putting in place the main foundations needed to advance decent work, international labour standards and responsible business conduct within trade and investment processes in Southern Africa.

The full achievement of the expected outcomes remains ongoing. Further work is still needed to consolidate national-level capacity in the four target countries, strengthen sub-regional engagement at SADC level, deepen national dialogue on responsible business conduct, and expand cross-border learning.

Evaluation Objectives & Methodology

The overall objective of this evaluation was to assess the coherence, relevance, effectiveness, efficiency, impact and sustainability potential of the SUSTAIN project and to examine the progress achieved towards the expected outputs and outcomes. The evaluation analysed the extent to which the project has contributed to strengthening the capacity of labour ministries, labour inspectorates and social partners to promote international labour standards and responsible business conduct (RBC) in the context of trade and investment.

The evaluation covered the implementation of the SUSTAIN project from its start until March 1st, 2026.

The evaluation adopted a mixed-methods approach, combining qualitative evidence with available quantitative and documentary information to address the evaluation questions. Multiple data sources and methods were triangulated in order to strengthen the reliability and validity of the findings.

1. The evaluation began with a comprehensive review of available project documentation and related reference materials.
2. Semi-structured interviews were conducted online with relevant ILO staff project partners, constituents, EU representatives, and other key stakeholders available during the timeframe of this evaluation, all interviews were conducted online.

To ensure the credibility and reliability of findings, the evaluation applied a triangulation strategy, comparing information obtained from different sources, stakeholders, and methods.

Findings

Overall, the mid-term evaluation concludes that the SUSTAIN project is a highly relevant and strategically well-positioned intervention that addresses an important and previously under-served policy gap at the intersection of trade, investment, international labour standards, and responsible business conduct in Southern Africa. The project has responded to a real demand from constituents and institutions in Botswana, Lesotho, Namibia, and South Africa, as well as from regional actors, to better connect labour governance and decent work considerations with trade and investment agendas. Its strongest strategic value lies in its ability to translate broad ILO normative frameworks, regional commitments, and EU policy priorities into a practical platform for dialogue, capacity building, and policy engagement.

The evaluation concludes that the project is coherent in both concept and implementation, with a sound intervention logic and strong complementarity with national policy processes and related ILO initiatives. The tripartite-plus approach adopted by the project has been particularly valuable in bringing together institutions that had not traditionally worked together, especially ministries of labour, ministries of trade, investment promotion agencies, employers' organizations, and workers' organizations. Nevertheless, there remains some inconsistency between the breadth of the ambition, the number of countries covered, and the time and resources available.

In terms of effectiveness, the project has made good progress at output level and has successfully laid the institutional, technical, and relational foundations for broader outcome-level change. Important achievements include the establishment of Project Advisory Committees in all four countries, the adoption of national roadmaps, the formal appointment of national focal points for the promotion of the MNE Declaration, national and regional workshops, initial technical studies and policy tools, and the development of an online learning module. The project has been particularly effective in building awareness, mobilizing stakeholders, and opening new spaces for dialogue between labour and trade/investment actors. At the same time, the evaluation also concludes that outcome-level results remain emerging and uneven, which is consistent with the project's stage of implementation. The strongest results so far are in institutional mobilization, coordination, and agenda-setting, while more advanced

policy influence, implementation effects, and structural changes are still at an early stage.

With regard to efficiency, the evaluation finds that the project team has generally managed available resources well and has made effective use of partnerships, existing ILO expertise, and digital tools to operate across four countries and at regional level. Stakeholders widely recognized that the project is relatively small in size and that implementation has benefited from strong technical collaboration and efficient use of virtual communication.

On impact and sustainability potential, the evaluation concludes that SUSTAIN has generated early institutional signs of impact and sustainability, particularly by shifting the way trade, investment, labour standards, and responsible business conduct are understood and discussed within national policy spaces. However, as stated by an stakeholder, sustainability will require more strategic approaches taken at the country level. Strengthening non-state actors to participate more meaningfully in trade and investment and labour discussions. The project has supported coordination platforms, strengthened the visibility of labour issues within trade and investment discussions, and provided practical entry points for integrating the MNE Declaration and related standards into national processes. The project has also built a reasonable degree of ownership among stakeholders, especially through its tripartite-plus structures, roadmaps, focal point arrangements, and validated documentation. At the same time, sustainability remains promising but not yet assured. While the project has created mechanisms and momentum that stakeholders value, their continuation after project closure will depend on stronger institutional anchoring, clearer mandates, more structured follow-up, and, additional time and resources to embed the agenda into existing national systems.

Regarding cross-cutting issues, the evaluation concludes that the project is strongest on tripartism, social dialogue, and the promotion of international labour standards through dialogue and institutional mechanisms. By contrast, gender equality and non-discrimination, while clearly recognized in the project design, have so far been less visible in implementation and results.

RECOMMENDATIONS, LESSONS LEARNED AND GOOD PRACTICES

- R1. Strengthen and operationalize the national focal points so they become lasting coordination mechanisms.
- R2. Consolidate the current gains through a non-cost extension or follow-on phase focused on institutionalization.
- R3. Strengthen M&E by developing a results-based indicator framework
- R4. Strengthen the operational mainstreaming of gender equality and non-discrimination

Lesson learned - Workers' organizations may require tailored support to engage meaningfully in emerging trade, investment and RBC agendas

Good practice 1 - Tripartite-plus engagement is essential to integrate decent work into trade and investment processes

Good practice 2 - Use of digital tools to support multi-country coordination and implementation

Project background

Funded by the European Union, the SUSTAIN project (Promoting decent work and capacity building for labour ministries, labour inspections and social partners to advance international labour standards and responsible business conduct through sustainable trade and investments in Southern Africa) seeks to maximize the decent work outcomes of trade and investment by promoting the application of international labour standards and responsible business conduct (RBC). The project supports this objective through advisory services, institutional capacity strengthening, and the facilitation of dialogue among governments, employers' and workers' organizations, while fostering collaboration with ministries and development partners responsible for trade, investment and economic development to help ensure that trade and investment processes generate more and better jobs.

The SUSTAIN Project responds to several trends and challenges shaping trade and investment in the sub-region that affect decent work. These include:

- the increasing inclusion and importance for trading partners and international buyers of sustainability clauses within trade and investment agreements
- human rights and environmental due diligence legislation in the European union
- the drive to ensure that trade and investment lead to quality and sustainable outcomes in terms of sustainable development and human rights
- the growing need to align trade and investment with national development priorities

The SUSTAIN project is taking place against the backdrop of a volatile trade and investment landscape, affecting trade and investment flows, investor confidence, and long-term planning. However, opportunities are also emerging through the identification of new markets, a stronger push for economic diversification and industrial development, and the continued concretization and operationalization of the African Continental Free Trade Area (AfCFTA), which holds significant potential to influence regional trade dynamics and decent-work outcomes. The evaluation will seek to understand how the project has adapted to these trade-related developments to date.

The SUSTAIN project is guided by the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy (MNE Declaration). The project directly aligns with the ILO Strategy on Decent Work in Supply Chains (adopted in March 2023), which calls, amongst others, on the Office to support ILO Members regarding labour provisions in trade agreements, to make better use of the MNE Declaration as it applies to decent work and policy coherence in supply chains, including international labour standards and human rights due diligence.

The project contributes directly to Outcome 4 "Sustainable enterprises for inclusive growth and decent work"/ Output 4.2. "Increased capacity of constituents to develop

more resilient, inclusive and sustainable enterprises in supply chains and responsible business conduct for decent work” of the ILO Programme and Budget 2024-2025. The projects development objective is to advance decent work, social justice and inclusive economic growth through respect for international labour standards and the promotion of responsible business conduct within the context of trade and investment (policy and practice).

Towards achieving this objective, the project is expected to achieve the following results:

Outcome 1: Strengthened knowledge base on the trade, investments and decent work nexus informs evidence-based dialogue and policies

- **Output 1.1 Tripartite constituents and stakeholders are better informed about labour provisions in trade and investment agreements to foster respect for fundamental principles and rights at work and the uptake of responsible business practices**

Outcome 2: Enhanced knowledge and capacity of government officials and social partners lead to improved implementation of trade and investment agreements, and advance respect for international labour standards and the promotion of RBC

- **Output 2.1 The capacities of government officials and social partners on advancing international labour standards and RBC through trade and investment agreements are strengthened at the national level (in the four target countries)**
- **Output 2.2 The capacities of government officials and social partners on advancing international labour standards, gender equality and non-discrimination and RBC through trade and investment agreements are strengthened at the sub-regional level (at SADC level)**

Outcome 3: Increased dialogue and experience-sharing across and between governments and social partners enhance policy coherence and synergies for the promotion of RBC and sustainable trade and investments

- **Output 3.1 National dialogue on RBC is strengthened**
- **Output 3.2 Cross-border learning on RBC is strengthened**

Introduction to the Evaluation

Evaluation is an essential component of project management within the ILO, serving as a tool for accountability, evidence-based decision-making, and organizational learning. It enables the systematic identification, generation, and sharing of knowledge, while providing credible and verifiable evidence on the relevance, effectiveness, efficiency, impact, and sustainability of development interventions. In accordance with the ILO Evaluation Policy and applicable guidelines, provisions for evaluation were included in

the project. Under these provisions, the SUSTAIN project was subject to one internal mid-term evaluation and one independent final evaluation.

The primary objective of this evaluation was to assess the overall performance of the SUSTAIN project in terms of its coherence, relevance, effectiveness, efficiency, impact, and sustainability potential.

The evaluation examined the extent to which the project has so far contributed to strengthening the capacity of labour ministries, labour inspectorates, and social partners to advance international labour standards and responsible business conduct (RBC) within trade and investment policy processes. The evaluation also aimed to inform decision-making for future interventions and contribute to organizational learning within the ILO, its constituents, and other stakeholders, while ensuring accountability to the European Union, as the development partner.

More specifically, the evaluation sought to:

- **Assess the achievement of project results to date**

Evaluate the extent to which the project had achieved its intended outputs and outcomes, particularly in strengthening the capacity of labour ministries, labour inspectorates, and social partners to promote international labour standards and responsible business conduct within trade and investment frameworks and identify internal and external factors that influenced the achievement of results, including the effectiveness of the strategies employed and the challenges encountered during implementation.

- **Assess the project's contribution to broader development objectives**

Examine the project's contribution to promoting decent work through sustainable trade and investment, including its alignment with Sustainable Development Goal 8 (Decent Work and Economic Growth) and assess the project's contribution to relevant ILO Programme and Budget outcomes, particularly those related to strengthening constituents' capacities to implement international labour standards and promote responsible business conduct, and to the DWCP objectives.

- **Analyse the effectiveness of the project's implementation strategies**

Examine the effectiveness of the approaches adopted by the project, including advisory services, capacity-building activities, and policy dialogue, in strengthening collaboration between Ministries of Labour, Workers' and Employers' organizations and actors responsible for trade, investment, and economic development and assess the extent to which project strategies had supported the integration of international labour standards and RBC considerations into trade and investment processes.

- **Assess the efficiency of resource utilization**

Analyse the efficiency with which financial, human, and material resources were used in implementing the project and assess the effectiveness of project management arrangements and the extent to which partnerships with national institutions and development partners contributed to the efficient delivery of results.

- **Examine the potential for sustainability of project outcomes**

Assess the extent to which the project had strengthened institutional capacities, policy frameworks, and stakeholder engagement mechanisms that could sustain progress in promoting decent work and responsible business conduct beyond the duration of the project and evaluate the level of ownership among national stakeholders and the likelihood that project results would continue after the completion of development partner funding.

- **Identify lessons learned and good practices**

Document lessons learned and good practices emerging from the project implementation, particularly regarding the promotion of decent work and responsible business conduct through trade and investment policy processes.

- **Provide recommendations for future interventions**

Provide actionable and forward-looking recommendations to the ILO, the development partner, and national stakeholders to strengthen future initiatives aimed at promoting international labour standards and responsible business conduct through trade and investment.

- **Contribute to organizational learning**

Generate insights into effective approaches for integrating labour standards and decent work considerations into trade and investment policies, which may inform future ILO interventions and partnerships in this area.

Objectives and scope of the evaluation

Objectives of the Evaluation

The overall objective of this evaluation was to assess the coherence, relevance, effectiveness, efficiency, impact and sustainability potential of the SUSTAIN project and to examine the progress achieved towards the expected outputs and outcomes. The evaluation analysed the extent to which the project has contributed to strengthening the capacity of labour ministries, labour inspectorates and social partners to promote international labour standards and responsible business conduct (RBC) in the context of trade and investment.

The evaluation also identified challenges and opportunities encountered during implementation and provides recommendations to support the remaining implementation period of the project, improve delivery of results, and strengthen the sustainability of project outcomes.

Specific Objectives

The evaluation has:

- Analysed the project's implementation strategies and assess their effectiveness in achieving the expected outcomes, including the extent to which the project has promoted innovative approaches to integrating labour standards and responsible business conduct into trade and investment processes.

- Reviewed the institutional arrangements, coordination mechanisms, and implementation capacities of the project, including the effectiveness of project management structures, monitoring systems, and planning tools such as work plans and monitoring frameworks.
- Assessed the progress of project implementation and identify factors that have positively or negatively influenced the achievement of results.
- Evaluated the efficiency of the interventions, including the use of financial, human, and technical resources in delivering project activities.
- Assessed the extent to which project outcomes are likely to be sustained, including the level of institutional ownership, strengthened capacities, and policy frameworks supporting the promotion of international labour standards and responsible business conduct.
- Identified lessons learned and emerging good practices that can inform the design and implementation of similar initiatives in the future.
- Reviewed strategies aimed at ensuring the sustainability and potential expansion of project results beyond the duration of the project.

Evaluation Users

The primary users of this evaluation are the ILO project team and tripartite constituents in participating countries. The findings will support decision-making related to the ongoing implementation of the project and contribute to improving the effectiveness of future interventions.

Secondary users include the European Union as the project development partner, relevant ILO technical departments and country and regional offices, and national stakeholders involved in promoting sustainable trade and investment.

Evaluation Scope

The evaluation covered the implementation of the SUSTAIN project from **its start until March 1st, 2026**. It assesses progress towards the achievement of the project's outputs and outcomes as defined in the project logical framework.

The evaluation also examined the **relevance** of project strategies, the effectiveness of implementation mechanisms, and the **sustainability of results achieved to date**. Cross-cutting issues were integrated throughout the evaluation process and analysis, in accordance with ILO evaluation guidelines. In particular, the evaluation considered gender equality and non-discrimination as a key cross-cutting issue.

Geographical Scope

The evaluation covered the four countries participating in the SUSTAIN project: South Africa, Namibia, Botswana, and Lesotho and also assessed relevant regional coordination and knowledge-sharing activities supporting the project's objectives.

Evaluation Criteria & Questions

The evaluation was carried out in adherence with the **ILO Evaluation policy and guidelines**, as well as UNEG norms and standards. It was guided by the **OECD/DAC main**

evaluation criteria (relevance, coherence, effectiveness, efficiency, impact and sustainability) in addition to ILO cross-cutting criteria.

The following criteria were used:

Relevance and strategic fit

The extent to which the project design and objectives respond to the needs and priorities of governments, employers' and workers' organizations, and other stakeholders involved in trade, investment, and labour governance.

Questions explored:

- To what extent is the SUSTAIN project aligned to the needs and priorities of tripartite stakeholders and beneficiaries identified in the project documents and during implementation?
- To what extent is the SUSTAIN project aligned with the socioeconomic realities and specific challenges of each target country?
- How well does the project align with ILO strategic priorities and relevant international frameworks?

Coherence

The compatibility and complementarity of the project with national policies, other ILO initiatives, and international frameworks related to sustainable trade, international labour standards, and responsible business conduct.

Questions explored:

- To what extent does the project complement other initiatives and policies related to trade, investment, and labour standards in the participating countries?
- How effectively has the project coordinated with other development partners and national institutions working in related areas?

Effectiveness

The extent to which the project has achieved or is likely to achieve its intended outputs and outcomes.

- To what extent has the project achieved its expected mid-term results at the output and outcome levels? Have there been any changes in the specific areas defined as the project outputs?
- How effectively has the project strengthened the capacity of labour ministries, labour inspectorates, and social partners to promote international labour standards and responsible business conduct?
- What are the main constraints experienced by the project (both in terms of methodology and context)?

Efficiency

The extent to which project resources have been used in an optimal manner to achieve results.

- Have resources available (time, funds, partnerships, knowledge, expertise and tools) been used efficiently?
- Were project management structures, coordination mechanisms, and monitoring systems appropriate and effective?

Impact and Sustainability potential

The likelihood that the benefits and capacities generated by the project will continue after the end of project support.

- To what extent has the project generated early signs of impact in strengthening the integration of international labour standards and responsible business conduct (RBC) in trade and investment processes?
- Are the interventions' results structured to ensure long-term sustainability beyond their lifecycle?
- How effectively have the interventions built local ownership, institutional capacity, and stakeholder commitment to sustain their outcomes and impacts? To what extent are national institutions and implementing partners prepared to sustain the outcomes without continued ILO support?
- What mechanisms, partnerships or policy processes established by the project are likely to continue after the project ends?

Cross-cutting issues were also be considered through the following questions:

- To what extent did the interventions mainstream gender equality and non-discrimination principles into their design and implementation?
- How effectively did the interventions promote strong and independent worker and employer organizations and facilitate constructive social dialogues?
- How is the project advancing the implementation of International Labour Standards?

Evaluation methodology

The internal mid-term evaluation complied with the evaluation norms and standards established in the ILO Evaluation Policy and related procedures and guidelines. The ILO adheres to the evaluation norms and standards of the United Nations Evaluation Group (UNEG), as well as the OECD/DAC Evaluation Quality Standards. The evaluation also followed applicable ethical safeguards to ensure independence, transparency, and integrity throughout the evaluation process.

The evaluation adopted a **mixed-methods approach**, combining qualitative evidence with available quantitative and documentary information to address the evaluation questions. Multiple data sources and methods were triangulated in order to strengthen the reliability and validity of the findings.

The evaluation was conducted in a participatory manner, to the extent feasible, through engagement with key stakeholders involved in the SUSTAIN project across the four participating countries and at regional level. This approach made it possible to capture

perspectives from governments, employers' and workers' organizations, ILO staff, development partners, and other relevant institutions involved in sustainable trade, international labour standards, and responsible business conduct. In total, the evaluator conducted 18 interviews, of which 6 were with ILO staff, 3 with European Union representatives, and 9 with regional or country-level stakeholders. Participation was nevertheless more limited than initially envisaged, as a broader group of stakeholders had originally been identified for consultation, but not all responded to interview requests or joined scheduled meetings.

The evaluation used the following data collection methods:

Document and desk review

The evaluation began with a comprehensive review of available project documentation and related reference materials. These included the project document, progress reports to the development partner, national and regional workplans, Project Advisory Committee minutes, national roadmaps and roadmap follow-up documents, country profiles, relevant ILO Governing Body documents, constituent statements, and other available background materials related to trade, investment, international labour standards, responsible business conduct, and national policy frameworks. Relevant ILO country programme documents, national development frameworks, and supporting materials produced by or linked to the project were also reviewed where available. This desk review provided the basis for understanding the project's design, implementation progress, institutional arrangements, and evolving results, and informed the preparation of the interview guides and the overall assessment framework.

Key informant interviews

Semi-structured interviews were conducted online with relevant ILO staff project partners, constituents, EU representatives, and other key stakeholders available during the timeframe of this evaluation¹. These interviews were used to gather qualitative insights on project implementation, achievements, challenges, ownership, sustainability, and lessons learned. A list of potential interviewees was prepared with support from the evaluation manager. Due to time constraints such as the evaluation period overlapping with the ILO Governing Body and stakeholder's availability, the evaluation relied on a sample of stakeholders across countries and institution types rather than full coverage of all stakeholders taking part of the project.

Data analysis approach

Data collected through document review and interviews was analysed using a criteria-based approach structured around the evaluation questions and the OECD-DAC evaluation criteria.

Qualitative data from interviews was reviewed and organized thematically in order to identify recurring issues, patterns, differences across stakeholder groups, and country-level variations. This analysis helped generate key findings related to project

¹ Please see limitations of the evaluation for further information.

implementation, institutional change, policy coherence, ownership, sustainability, and perceived results.

Documentary evidence was analysed in parallel and used to verify, nuance, or challenge interview findings. Particular attention was given to the project document, progress reports, national roadmaps, roadmap follow-up documents, PAC minutes, workplans, and other relevant project records in order to assess progress against intended outputs and outcomes and to understand the project's design and implementation logic.

Available quantitative and monitoring information, such as the number of activities conducted, stakeholders reached, and implementation milestones reported by the project, was used to complement the qualitative findings and assess the extent to which outputs had been delivered. However, given the nature of the project's results framework, the analysis relied more heavily on qualitative and documentary evidence to assess emerging outcomes, institutional changes, and policy influence.

Triangulation Strategy

To ensure the credibility and reliability of findings, the evaluation applied a triangulation strategy, comparing information obtained from different sources, stakeholders, and methods.

Triangulation involved:

- comparing evidence from project documentation, interviews, and monitoring data
- analysing perspectives from stakeholders participating in the interviews
- examining similarities and differences across the four participating countries

This approach will help validate findings and reduce potential bias, ensuring that conclusions are based on consistent and corroborated evidence.

Limitations of the evaluation

The evaluation was conducted entirely online, which presented certain limitations that need to be taken into account, while reading and using the evaluation results:

Limited participation of some stakeholders - Although a broader range of stakeholders had initially been identified for interview, not all of them participated in the evaluation. In several cases, stakeholders did not respond to interview requests or did not join despite interviews having been scheduled. This required repeated follow-up and used evaluation time and resources without generating the expected data.

As a result, the final interview sample was not only smaller than planned, but also unevenly distributed across stakeholder groups and countries. Of the 16 interviews conducted, 6 were with ILO staff, 3 with EU representatives, 2 with regional stakeholders, and only 5 with country-level stakeholders outside the ILO, distributed unevenly across countries and not always covering a tripartite structure.

This imbalance means that the evaluation captured some perspectives more strongly than others, particularly those of the ILO, while evidence from some national contexts remained more limited. Consequently, findings for some countries and stakeholder

groups relied more on document review and triangulation than on direct interview evidence.

Lack of face-to-face interaction - Conducting interviews online limited the depth of engagement and rapport that might otherwise have been established through in-person discussions. Non-verbal cues and interactions were also more difficult to observe, which may have affected the richness of some of the data collected. To mitigate this, the evaluator used structured interview guides and encouraged open discussion, allowing participants to express themselves freely in the language in which they felt most comfortable.

Limited observation opportunities- As no in-person field visits were carried out, the evaluator was not able to directly observe project activities, stakeholder interactions, or field-level dynamics. This reduced the possibility of assessing certain contextual and environmental factors that may have influenced the project's implementation and results.

Monitoring and evaluation framework - The evaluation's ability to assess progress at result level was constrained by the nature of the project's monitoring framework, which is primarily activity-based. While the available documentation made it possible to verify the delivery of outputs such as workshops, briefs, roadmaps, focal point nominations, and other project activities, it provided more limited evidence on the extent to which these outputs had translated into changes in stakeholder knowledge, institutional behaviour, policy influence, or stronger implementation of labour-related provisions.

Note that: The evaluation does not attribute observed institutional and governance developments solely to SUSTAIN, as these changes are influenced by broader policy, institutional and regulatory dynamics beyond the project's direct control. Rather, it assesses the extent to which the project has contributed to these developments by convening actors, supporting capacity development, introducing practical tools, promoting the use of the ILO MNE Declaration, and creating spaces where labour, trade and investment actors can engage around responsible business conduct and decent work.

Ethical Considerations

The evaluation was guided by the highest ethical standards, adhering to the [ILO's Code of Conduct for Evaluators and](#) the UN Evaluation Group (UNEG) guidelines. The evaluator, although internal, maintained independence and impartiality, ensuring that findings and recommendations are anonymous, unbiased and objectively presented. Key informant participants were briefed on the purpose, methods, and use of the evaluation data. Confidentiality will continue to be strictly maintained, with all personal and sensitive information handled discreetly, ensuring that no harm comes to participants as a result of their involvement.

The evaluation process respected cultural norms and sensitivities in each participating country, with careful consideration of national contexts, institutional arrangements, gender dynamics, and social dialogue practices.

Transparency was a core principle of the evaluation process. Clear communication was maintained with all stakeholders regarding the purpose of the evaluation, the

methodology used, and the expected outputs of the evaluation. This helped ensure that stakeholders understand the objectives of the exercise and feel comfortable sharing their perspectives.

All data collection followed strict confidentiality and data protection protocols. Information collected during the evaluation will be used solely for evaluation purposes, and data will be securely stored in accordance with ILO data management procedures, including storage on official ILO equipment where applicable and deleted after the evaluation process has concluded.

To date, the evaluator did not find any evidence of wrongdoing, unethical behaviour, or misconduct.

Evaluation Results

Relevance & Strategic Fit

Overall, the evaluation finds that SUSTAIN is highly relevant and strategically well aligned. The project comes to support stakeholders, to narrow the gap that exists at the intersection of trade, investment, international labour standards and responsible business conduct. Especially in a context where these issues had previously been treated largely as separate areas of work with limited interaction. Across the participating countries, stakeholders consistently described the project as timely, relevant and strategic, particularly at a moment when trade relations, investment flows and emerging sustainability-related requirements are becoming increasingly important in the global development agenda. The project design reflects both the evolving external policy environment and the institutional needs of the ILO's tripartite constituents, while also showing strong alignment with the ILO's normative mandate, its growing focus on decent work in supply chains and responsible business conduct, African regional priorities on inclusive growth and labour governance, and EU policy interest in advancing decent work through trade, investment and sustainability frameworks.

Alignment with the needs and priorities of stakeholders and the socioeconomic realities and specific challenges of each target country

The evaluation finds that the SUSTAIN project is largely well aligned with the needs and priorities of tripartite stakeholders. At design level, the project correctly identified a real policy and institutional gap: trade and investment are increasingly shaping employment, labour governance, and responsible business conduct in target countries, yet labour ministries, labour inspectorates, employers' organizations, and workers' organizations often remain insufficiently equipped to engage these issues in a structured and influential way. As per the evaluation, this core project assumption remains valid and is consistent with the current context.

Interviews conducted provided strong evidence of the Project's overall relevance. Most respondents emphasized that the project addresses an issue that had previously received limited attention, namely the weak connection between trade and investment policy on one hand, and labour standards, labour inspection, social dialogue, and decent work outcomes on the other. These are issues as well that are being led by different Ministries (at the government level) and distinct partners, who before the project, were not coordinating with each other on a regular basis. Some interviewees mentioned that

although labour is key for productivity, it was not considered part of the trade and investment discussions, and the labour ministry was normally not invited to the conversation.

In **Botswana** the project was introduced through a multisectoral stakeholder engagement involving ministries and tripartite actors, followed by the appointment of focal points and the preparation of a country workplan designed to build on existing mechanisms rather than duplicate them, which suggests that the project design was adapted through consultation and linked to national structures. Furthermore, Botswana's UNSDCF² in its Outcome 4: Prosperity, refers to trade as critical and makes reference to the interest of the country to seek strategic opportunities to boost trade in relation to its relationship with SADC and through trade pacts such as the African Continental Free Trade Area (AfCFTA) which the project aims to support.

In **Namibia**, interviews also suggested that SUSTAIN is relevant because it responds to concrete institutional and economic pressures faced by Namibia in relation to trade with the EU and other major markets. One respondent noted that many investors entering the country do not sufficiently understand national labour laws and that the project is timely because it can help both to capacitate labour inspectors and to educate investors. Namibia's UNSDCF³ Outcome 2 directly relates to SUSTAIN, as it aims for a diversified, resilient and human rights economy that champions sustainable decent jobs, livelihoods and reduces inequalities.

South Africa appears to be institutionally more mature than some of the other target countries, and interview feedback suggests that the challenge is the lack of capacity to integrate labour, responsible business conduct, and sustainability concerns more effectively into a sophisticated but constrained trade and investment environment. This is highly relevant in a context where the EU is South Africa's main trading partner and largest source of Foreign Direct Investment (FDI), and where bilateral trade has continued to grow under the EU-SADC EPA. The recent EU-South Africa Clean Trade and Investment Partnership signed on November 2025⁴, further increased the importance of ensuring that trade, industrialisation, beneficiation, and environmentally clean supply chains are accompanied by labour standards and social dialogue. Furthermore, South Africa's UNSDCF's⁵ outcome 1.1 on increasing employment opportunities and 1.2 on enabling environment for businesses interact to support SUSTAINs sustainability potential.

In **Lesotho**, the relevance of SUSTAIN appears high, although still somewhat aspirational in terms of implementation depth. Interview feedback points to a strong interest by the interviewee's organization in using the learnings gained through the project to strengthen their service offerings on trade and investment, investor support, data, evidence-based policy development, environmental sustainability, and responsible business conduct. The issues covered by the project remain highly pertinent in the

² <https://botswana.un.org/sites/default/files/2022-10/UNSDCF-BW2022-2026.pdf>

³ https://namibia.un.org/sites/default/files/2025-03/Namibia%20UN%20Sustainable%20Development%20Cooperation%20Framework%202025_2029%20compressed.pdf

⁴ https://policy.trade.ec.europa.eu/factsheet-eu-south-africa-clean-trade-and-investment-partnership-ctip_en

⁵ <https://southafrica.un.org/sites/default/files/2022-06/Final%20signed%20UNSDCF%20-%20Hi%20Res.pdf>

country, as it was highlighted during the interviews that the country's economy remains heavily exposed to trade shocks, especially in textiles and apparel, and where uncertainty around trade preferences and weak diversification continue to create vulnerability. Even though SUSTAIN is not a textile project, textiles and apparel example, makes its focus on labour governance, trade-related capacity, and policy coherence especially relevant. Lesotho's UNSDCF⁶ does not appear to directly make reference to the relation between trade and investment and labour rights, however it highlights the commitment of the country to take the opportunities offered by the SADC Trade Protocol and the African Continental Free Trade area.

At the regional level, the project speaks directly to SADC priorities, especially the need to connect trade and investment protocols with labour and decent work priorities. Stakeholders shared that the objectives of the project are already reflected in regional instruments, which the project comes to complement, such as:

- The Regional Indicative Strategic Development Plan 202-2030⁷, especially Pillar I: Industrial Development and Market Integration; and Pillar III: Social and Human Capital Development.
- The SADC protocol on Employment and Labour⁸
- The SADC protocol on Trade⁹
- The SADC protocol on Finance and Investment¹⁰
- And the SADC Industrialisation Strategy and Roadmap 2015-2063¹¹

It was also noted that one of the project's most valuable contributions has been to bring multisectoral actors together and help countries better understand the nexus between responsible business conduct, trade, and labour. Nevertheless, some regional stakeholders felt that SUSTAIN remains too country-centred and has not yet fully translated its ambitions into meaningful interventions at regional level. One interviewee described this as an opportunity that should not be missed and advised that if the project seeks to influence trade policy, then regional interventions should be stronger, not merely advisory or consultative. This comment is important and suggests that while the project is relevant to regional priorities, its operationalization at regional level could be strengthened.

Overall, the evaluation finds that SUSTAIN is addressing the right issues and is broadly aligned with the needs and priorities of its intended stakeholders at the country level. Its relevance is strongest where stakeholders are seeking to bridge the longstanding divide between labour governance and trade and investment policy, and where countries are facing growing pressure to combine investment attraction with stronger labour compliance, social dialogue, and responsible business conduct.

⁶ <https://lesotho.un.org/sites/default/files/2023-08/UN%20Cooperation%20Framework%20Document%202024-2028.pdf>

⁷ <https://www.sadc.int/pillars/regional-indicative-strategic-development-plan-2020-2030>

⁸ <https://www.sadc.int/file/11440/download?token=MNj-92aa>

⁹ https://www.sadc.int/sites/default/files/2021-11/Protocol_on_Trade1996.pdf

¹⁰ https://www.sadc.int/sites/default/files/2021-08/Protocol_on_Finance__Investment2006.pdf

¹¹ <https://www.ilo.org/media/173031/download>

Alignment with ILO strategic priorities and relevant international frameworks

The project is explicitly anchored in core ILO normative and programming frameworks, notably the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration), the ILO Strategy on Decent Work in Supply Chains, and the ILO P&B 2024–2025 (under which it was developed), especially Outcome 4, Output 4.2 on strengthening constituents’ capacity to develop more resilient, inclusive and sustainable enterprises in supply chains and responsible business conduct for decent work. This alignment remains strong in the ILO’s 2026–2027 P&B, where Outcome 4 continues and explicitly adds a stronger emphasis on competitiveness and productivity growth for decent work, while retaining responsible business conduct and evidence-based policy support as central elements.

Interview evidence strongly reinforces the above. One respondent explained that the project emerged from earlier ILO work on the MNE Declaration, including trainings in 2022 and 2023, after which counterparts within the subregion expressed a need for operational support to ensure that when countries attract foreign direct investment, they do so in a way that respects fundamental principles and rights at work. This suggests that SUSTAIN did not emerge as an isolated initiative, but rather as a logical continuation of existing ILO strategic priorities and technical work on supply chains, investment, and responsible business conduct.

The project also aligns well with the ILO’s regional architecture in Southern Africa. Where the CO-Pretoria office is structured around a regional decent work country team. The office carries out annual meetings with ministries, where the project was introduced. An interviewed stakeholder shared that during the previous annual meeting with ministries of the CO-Pretoria, SUSTAIN was also discussed, during this meeting participants highlighted a clear expectation that the project should contribute not only to the participating countries but also to SADC-level learning and initiatives. This is consistent with the project’s stated intention to use subregional dialogue and peer learning so that experience from the four target countries can inform broader regional processes.

At the regional and continental level, the project is also well aligned with broader regional policy frameworks, such as the African Union Agenda 2063, the Abidjan Declaration adopted at the 14th African Regional Meeting, and SADC labour and social governance instruments. The agenda 2063 includes aspirations for inclusive growth, decent jobs, and human-centred development, while the SADC employment and labour agenda continues to emphasize labour market governance, social dialogue, and improved labour standards as part of regional integration and development. The SADC Protocol on Employment and Labour, signed in 2025, further strengthens the relevance of a project that supports labour-related governance, cooperation, and institutional dialogue in the subregion.

The project is also strongly aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, both of which remain key international reference frameworks for State action, enterprise conduct, and remedy systems.

Overall, the evaluation finds that SUSTAIN intervention logic, and country and subregional focus are firmly grounded in ILO strategic priorities and in the main

international and regional frameworks relevant to trade, investment, labour standards, and responsible business conduct. Its strongest strategic feature is that it translates these broad frameworks into practical support for constituents, especially by promoting peer learning, policy coherence, and stronger engagement between labour and trade actors in a region where such connections have often been weak or fragmented.

In addition, the project is relevant to the evolving trade and regulatory environment affecting countries and enterprises engaged in global supply chains, including those linked to the EU, in particular, the project is well aligned with the European Commission's Corporate Sustainability Due Diligence Directive (EU) 2024/1760, the Corporate Sustainability Reporting Directive (EU) 2022/2464, and the Forced Labour Regulation (EU) 2024/3015).

An interviewee noted that all target countries are increasingly concerned on meeting EU regulations linked to forced labour, supply chains, and due diligence, and by what these developments mean for enterprises in the target countries. At the same time, another respondent explained that the goal of the project is to support partner countries embed decent work principles does not only meet international standards, but it is embedded in their own domestic systems and institutions. Both reflections highlight the Project's relevance from the international to the national levels.

Coherence

The evaluation finds that SUSTAIN is very coherent and the project's problem analysis, stakeholder strategy, theory of change, and output structure are logically aligned. It complements other initiatives without obvious duplication, fits well with national institutional processes, and appropriately uses a tripartite-plus approach to bridge labour, trade, and investment.

Coherence with similar development initiatives for the sub-region

Evidence reviewed, including stakeholder interviews, suggests that at the moment there are no other projects in the region with a similarly explicit focus on the nexus between trade, investment, international labour standards, and responsible business conduct. In this sense, SUSTAIN addresses an area that has received limited structured support.

The project also shows good internal coherence with related ILO initiatives, for example SUSTAIN has collaborated with the Flemish-funded IMPLEMENT project on the organization of a regional seminar on trade, investment, and decent work in Africa. Furthermore, interviewees also highlighted the link of SUSTAIN with another EU-supported project on responsible business conduct which is under negotiation and is expected to cover 11 countries, including Namibia. This new project shows explicit provision for engagement with regional economic entities such as SADC. Taken together, these linkages suggest that SUSTAIN is not operating in isolation, but rather as part of a wider and evolving portfolio on responsible business conduct, trade, investment, and decent work. Such linkages strengthen coherence by promoting continuity, experience-sharing, and the possibility of scaling up results beyond the immediate project cycle.

Coherence with national and regional level initiatives

At national level, coherence is strengthened by the project's deliberate effort to work through existing institutions and policy processes rather than establishing parallel structures. While the use of Project Advisory Committees in Botswana, Namibia, Lesotho, and South Africa has been essential to bring together ministries of labour, ministries of trade, investment promotion agencies, employers' organizations, and workers' organizations. These committees reflect a relevant "tripartite-plus" approach and provide a practical mechanism for discussing how decent work considerations can be better integrated into wider trade and investment agendas.

The project also complements ongoing national policy and institutional processes in concrete ways. For example, in **Namibia**, SUSTAIN is providing technical advisory support to the Namibia Investment Promotion and Development Board to help integrate labour-related provisions and responsible business conduct principles into the forthcoming Special Economic Zones policy. In **Botswana**, the project produced a Decent Work and Trade and Investment Country Profile at the request of the national Project Advisory Committee, intended to guide dialogue, inform planning, and identify entry points for further action. These examples illustrate that the project is contributing to existing reform and policy discussions rather than remaining limited to stand-alone workshops or sensitization activities. Interview evidence also suggests efforts to coordinate with other country-level ILO initiatives where relevant, including the Global Accelerator in Namibia.

Interviewees emphasized that the project has been very conscious from the beginning that in order to achieve its objectives, it could not be implemented only with ILO traditional tripartite constituents. In this manner, the evidence shows that the project has engaged ministries beyond labour, including ministries of trade and investment promotion agencies, and has involved them in project governance and dialogue processes. This is an important strength, since the coherence of an intervention of this nature depends precisely on its ability to bridge institutional silos and foster policy coherence across mandates.

The project has also established structured engagement with EU Delegations in Botswana, Lesotho, Namibia, and South Africa through bilateral consultations. This with the objective of ensuring alignment with ongoing EU-funded initiatives and maintaining regular communication throughout implementation.

At subregional level, the project has engaged the SADC Secretariat as well as subregional employers' and workers' organizations such as SPSF and SATUCC. However, collaboration on specific events is only previewed for the second half of the project. This points to plans to connect national experience with broader SADC processes - much of this regional articulation remains for the timeline of this evaluation only at the planning stage.

Coherence of the intervention logic

From an internal design perspective, the project logic is also broadly coherent. The three outcomes follow a reasonable progression: first, strengthening the knowledge base; second, building the capacities of government officials and social partners; and third,

using dialogue and experience-sharing to enhance policy coherence and synergies. The outputs under each outcome are logically connected to this sequence. Under Outcome 1, the project planned case studies, policy briefs, country profiles, a web portal, and an e-learning tool. Under Outcome 2, it planned national workshops, labour inspector training, sensitization for employers' and workers' organizations, and subregional online learning for investment promotion agencies and other actors. Under Outcome 3, it planned national dialogues, roadmaps, dialogue platforms, and a cross-border experience-sharing event for SADC member States. Taken together, the outputs are coherent with the intended results in the sense that they are designed to move from awareness and knowledge to capacity, to policy dialogue and coordination.

However, the evaluation also finds that this internal coherence is stronger at the level of logic than at the level of proportion. The overall objective of the project is to advance respect for the principles of international labour standards and responsible business conduct within the context of trade and its intended impact is ambitious: promoting compliance with international labour standards and responsible business conduct through trade and investment agreements in four countries and, more broadly, among SADC member States, with an expected contribution to decent work, social justice, and inclusive growth. Yet the project duration is relatively short: a four-month inception phase followed by 24 months of implementation, for a limited budget to be shared across four countries. For a project covering four countries plus subregional activities with SADC, this is a relatively limited envelope given the above-mentioned agenda.

Concerning the relationship between outputs, outcomes, and indicators, the logical framework relies heavily on activity and participation indicators, such as the number of briefs produced, workshops organized, participants trained, and downloads from the project webpage. These are coherent with the project's strong capacity-building orientation, but they also make the project less evaluable, as they do not allow project management to measure the level of achievement of its intended results.

This does not make the design incoherent; however, it does suggest that the monitoring framework is better suited to tracking activity delivery than to assessing deeper outcome-level change. Consequently, the project's internal coherence is somewhat weakened at the level of results measurement: while the intervention logic only assumes, but not proves, a progression from knowledge generation to capacity development, to stronger policy coherence and improved implementation of labour-related provisions. However, the current M&E framework does not make it possible to verify this chain of change in a systematic way. Strengthening the framework so that it is more explicitly results-based would therefore improve both evaluability and coherence, by allowing clearer assessment of whether outputs are effectively contributing to the outcomes and broader changes the project seeks to achieve.

Concerning the project's risk register, it identifies, among others, the possibility of lower-than-expected demand, difficulties for tripartite constituents to engage in constructive dialogue, unplanned country-level events, and the possibility that governments might deprioritize advancing international labour standards and responsible business conduct within trade and investment. It also recognizes that the project depends on sustained constituent engagement and on the alignment of activities

with DWCPs and national priorities. The mitigation measures proposed, including PACs, continuous capacity building, and adaptive monitoring, are sensible and internally coherent.

Effectiveness

The evaluation finds that, at mid-term, SUSTAIN has made good progress toward its expected results, particularly at output level and in establishing the institutional, technical, and relational foundations necessary for broader outcome-level change. Overall, the project appears to be achieving what would reasonably be expected at this stage of implementation for an intervention of this size, thematic complexity, available resources, and duration.

At outcome level, the project's achievements are emerging but still preliminary, which is appropriate for a mid-term assessment. The clearest early outcome-level result is that the project has begun to shift the way stakeholders think about the relationship between trade, investment, and labour. Interviewees repeatedly stressed that the project has enabled actors to sit around one table, compare notes, identify common problems, and begin to discuss which clauses in agreements such as AGOA or the African Continental Free Trade Area may affect employment and labour conditions. Several described the creation of dialogue itself as an important achievement and even as "impact", though they also recognized that this remains a first step and not yet a measurable structural change. In other words, the project has been effective in opening a new policy and dialogue space; it has been less able, at this stage, to demonstrate more advanced changes in policy implementation, enterprise behaviour, or labour market outcomes.

This is also reflected in the documentary evidence. The project's roadmaps and workplans show a substantial number of regional and national activities still forthcoming in 2026–2027, including forums, regional dialogues, the online training, workshops for trade unions and employers, investment promotion training, and labour inspectorate events. The progress report likewise indicates that some major activities under Outcomes 2 and 3 remain planned rather than completed. This means that the project's strongest results at mid-term are still at the level of outputs, institutional arrangements, shared understanding, and initial follow-up mechanisms, rather than fully consolidated outcomes.

By the end of the first year, the project had organized the subregional launch, established Project Advisory Committees in all four countries, conducted national tripartite-plus workshops in Botswana, Namibia, and Lesotho, and supported the adoption of national roadmaps in all four countries, building on the earlier South African roadmap process.

At output level, the project has delivered a number of concrete results aligned with its expected outputs. **Under Outcome 1**, the project produced two draft guidance notes and advanced the self-guided e-learning course on trade, investment, decent work, and responsible business conduct, which is almost ready to be available online. The training course will be made available to all users beyond the project countries and can be beneficial for the implementation of other similar projects within Africa. It also developed a Botswana trade and investment country profile and supported employer

organizations in Botswana and Namibia to begin SME surveys on RBC awareness and practice.

Under Outcome 2, the project delivered national workshops, facilitated the designation of tripartite national focal points for the promotion of the ILO MNE Declaration in all four countries, and provided technical support to institutions such as the Namibia Investment Promotion and Development Board. Interview evidence broadly confirms these achievements. Several respondents referred to the national workshops, the creation of national focal point structures, the advisory committees, and the project's overall success in carrying out the inception phase and establishing the implementation architecture. One interviewee noted that, given the simplicity of the project design and limited size of the team, "the team is doing great," especially in building knowledge, bringing stakeholders on board, and ensuring inclusive participation at national level. The management of the Project's website and the availability of timely information from the project was also highlighted as a positive outcome of the project.

The strongest area of effectiveness at this stage appears to be capacity building and institutional mobilization. Respondents reported that the project had helped government officials, employers' organizations, workers' organizations, and investment-related actors better understand the nexus between trade, labour, and responsible business conduct. Several respondents stated that one of the main problems had long been that trade issues were treated separately from employment issues, and that the project had helped multisectoral actors come together and understand the relationship between the two. It was also emphasized that the project had provided a platform for governments to look at trade and investment in a more comprehensive way and had helped create the understanding that labour issues need to be taken into account in trade discussions. Others highlighted the project's value in enabling trade officials to explain trade agreements to social partners, thereby broadening understanding of trade issues beyond the traditional focus on extra-regional agreements to include regional and intra-African dimensions as well.

This finding is supported by documentary evidence. The progress report notes that more than 100 participants from labour ministries, trade ministries, investment promotion agencies, employers' and workers' organizations took part in the national tripartite-plus workshops in Botswana, Namibia, and Lesotho, and that the workshops were explicitly intended to strengthen understanding of the links between trade, investment, decent work, and RBC, as well as to support dialogue and planning. The regional and national workplans for further show that the project intends to deepen this work through additional regional workshops for employers' organizations, workers' organizations, trade and investment officials, labour inspectors, and investment promotion agencies.

The project has also been effective in introducing and operationalizing the MNE Declaration in ways that go beyond purely normative reference. This theme emerged very clearly in the interviews. Several respondents pointed to the designation of national focal points for the promotion of the MNE Declaration as one of the project's most important achievements. One noted that having several focal points rather than a single champion was especially useful because ownership is shared across actors and institutions. Another stressed that the project went beyond expectations by securing

formal commitments from all four countries to appoint focal points before the end of the first year, and that this has already created a basis for longer-term results. Another respondent explained that, while the MNE Declaration had previously been known as one among many ILO instruments, the project had helped actors think about how to use it more practically in relation to enterprises, government, and responsible business conduct. Finally, another stakeholder mentioned that the project had already surpassed expectations at this stage by triggering formal commitments and building capacity on the use of the relevant instruments. These views are consistent with the documentary record, which confirms official appointment of focal points in all four countries, and with the roadmap and PAC minutes showing that focal point structures are already being used to coordinate action planning and dialogue. That being said, most non-ILO stakeholders could not go in deep into the actual expected role of the MNE focal points, which highlights the need for further support of the Project for the operationalization of these governance arrangements.

In Botswana, effectiveness is visible not only in workshop delivery but in post-workshop follow-up. The roadmap identified focal point designation, integration of trade and investment issues into the DWCP steering committee, company-focused RBC tools, webinars, and research on manufacturing and FDI-related decent work issues. The Botswana roadmap progress report confirms that focal points were designated, meetings were convened to develop a joint action plan, the Business Botswana RBC survey, and the resource hub in the business Botswana website, were rolled out, and webinar sessions with special economic zone actors took place. PAC minutes further show discussion of guidelines for investors, compliance tools, and the integration of RBC expectations into licensing, investor facilitation, procurement, and sector regulations. Interview evidence from Botswana reinforces this, with one respondent pointing specifically to capacity building of government officials and business actors, including work to support the sustainability of special economic zones, and describing the project as very timely in helping labour institutions address investor compliance with national labour law.

In Namibia, documentary evidence similarly points to concrete mid-term results. The roadmap and PAC minutes show progress on focal point designation, discussion of a possible MNE secretariat, near completion of a country study, work on FDI impact measurement through decent work KPIs, and dialogue with the Ombudsman's Office on the National Action Plan on Business and Human Rights. Interviewees also highlighted that the project had succeeded in creating a platform to engage across institutions and in bringing home the practical relevance of the MNE Declaration. One respondent emphasized that the project had done very good job on bringing partners together, allowing them to network, understand each other's perspectives, and build a base for future work.

In Lesotho, results appear more mixed. The roadmap is ambitious and includes focal point designation, a technical working group or secretariat, policy mainstreaming, support to the LNDC, capacity building for workers, employers, labour inspectors and ministries, and integration of trade and investment into the DWCP. The progress report confirms that focal point nominations were submitted and terms of reference for the technical working groups were also prepared. Interview evidence also points to concerns

regarding the pace of implementation. It was highlighted that the project had started slowly and that stakeholders would expect stronger evidence of policy influence from the project. Nevertheless, it was acknowledged that the project is working on the terms of reference for the focal points and that dialogue has begun. This indicates that while progress is evident, the pace and depth of implementation is expected to speed up during the second half of implementation.

In South Africa, the project builds on an earlier 2023 roadmap rather than starting from scratch. Documentary evidence indicates that SUSTAIN has taken forward that earlier process through the establishment of a Project Advisory Committee, the promotion and operationalization of national focal points, and the preparation of follow-up workshops and dialogue processes. The August 2025 PAC minutes explicitly position SUSTAIN as building on the achievements of the 2023 tripartite workshop in Johannesburg and as a vehicle for taking forward the roadmap adopted at that time, including the appointment of national focal points for the promotion of the ILO MNE Declaration and further support to their functioning. This continuity is also reflected in the substance of the 2023 South African roadmap, which already identified key priorities such as policy coherence, employment creation, skills development, social protection, improved working conditions, equality of opportunity, collective bargaining, and occupational safety and health, together with agreed follow-up actions including a gap analysis, mapping of trading partner requirements, training, a national code of practice, and the establishment of a national focal point through NEDLAC.

Interview evidence reinforces the above. During the interviews it was highlighted to the evaluator that the South African delegation explicitly referred to SUSTAIN and highlighted the importance of policy coherence between decent work priorities and trade and investment. Indeed, the evaluation reviewed the South Africa's formal statement under POL/5, and confirmed that it describes SUSTAIN as a mechanism through which the MNE Declaration is being operationalized at policy and institutional level across South Africa, Lesotho, Botswana and Namibia. The statement emphasizes that SUSTAIN strengthened the capacity of governments and social partners to align trade and investment frameworks with labour standards and decent work outcomes, supports the integration of labour provisions into trade agreements, promotes policy coherence across ministries, and embeds responsible business conduct into investment strategies. It further describes the national focal points as "practical engines of coordination" that help ensure the social dimension of trade and investment is systematically addressed in national policy and practice.

More broadly, the March 2026 Governing Body document on promotion of the MNE Declaration identifies South Africa among the 23 Member States that have appointed national focal points and cites SUSTAIN as one of the development cooperation projects supporting constituents in harnessing trade and investment to advance decent work through responsible and sustainable business practices.

A particularly important area for follow-up concerns the labour inspection component. The project document identified labour inspection as a core element of Output 2.1 and originally envisaged a face-to-face workshop for labour inspectors from the four target countries on their role in promoting sustainable and responsible business practices and

investments for the realization of decent work, FPRW, and inclusive growth. However, at mid-term, this component had not yet materialized in the form initially planned. Right now, the component is planned to be concluded through an on-line activity to be carried out in 2026. This suggests that one of the project's most concrete pathways for supporting the practical implementation of international labour standards may be delivered later than initially envisaged, and potentially in a format that is broader and less targeted than originally planned.

It was highlighted that the project is, to a significant extent, a capacity-building and training-oriented intervention operating in a complex policy field, while the longer-term outcome sought is more ambitious: stronger integration of labour provisions, decent work, and responsible business conduct into trade and investment policy and practice. For example, some respondents questioned whether, within its duration and resources, the project will be able to show concrete evidence that countries have improved the way labour provisions and decent work considerations are reflected in trade and investment frameworks, even if awareness and institutional engagement have clearly advanced. This poses the question of what can realistically be demonstrated within the project lifetime, and what could be the broader systemic change that can only be assessed in the long term.

A final consideration regarding effectiveness concerns the project's ability to demonstrate the actual effects of its capacity-development efforts. While the project has clearly advanced in relation to its planned activities and has made visible progress toward its objectives, the evaluation could only assess effectiveness at result level to a limited extent. As noted in the Coherence section, the project's monitoring framework is primarily activity-based and focuses largely on delivery indicators, such as workshops held, focal points nominated, or tools produced, rather than on evidence of change in knowledge, behaviour, institutional practice, or policy influence. As a result, the evaluation was able to confirm that many activities took place and that important institutional processes were initiated but was less able to verify the extent to which these efforts have already translated into sustained or shared understanding among stakeholders.

A concrete example concerns the nomination of national focal points, which was frequently highlighted by interviewed ILO stakeholders as one of the project's most important results. However, interviews at country level suggest that this achievement is not yet understood in the same way by all stakeholders. Some viewed the nomination primarily as a formal step, without yet having a clear sense of the responsibilities, expectations, or added value attached to the role. More broadly, the interviews suggest that participation in project activities should not automatically be interpreted as evidence that the intended level of capacity strengthening has already been achieved, for example, an interviewed stakeholder did not appear to have a clear understanding of the MNE Declaration itself, despite it being central to the project. This does not invalidate the progress made, but it does suggest that some of the project's capacity-development efforts may still need further consolidation before their intended effects can be fully realized and evidenced.

Efficiency

The evaluation finds that SUSTAIN has used its available resources efficiently, particularly considering the complexity of the agenda, the number of countries covered, and the relatively limited budget and staff supporting the Project exclusively.

Across interviews, stakeholders generally recognized that the project is small in scale but has nonetheless been able to establish governance structures in four countries, convene diverse stakeholders, support the designation of focal points, develop roadmaps and knowledge products, and maintain regular engagement at national and regional level. Some respondents explicitly stated that the ILO has used the available resources well, that the activities delivered are in line with the project structure, and that the project manager and support team have done “an excellent job” in moving the work forward.

An ambitious agenda requires efficient use of resources

Most stakeholders agreed that a project covering four countries and an ambitious agenda would normally require either more time, or more financial resources, or both. Stakeholders from several countries expressed the view that two years is a short timeframe for an agenda involving long-term policy and institutional change, and some argued that a second phase or extension would be needed to consolidate what has been started. Others noted that the budget is not necessarily insufficient for all current activities, but may be insufficient for the level of depth, continuity, and regional anchoring that many stakeholders now expect.

On the other hand, some stakeholders felt that, for a policy-oriented intervention, the current resource level was acceptable, since the goal was from the beginning not on the ground implementation, but policy dialogue, capacity development and institutional strengthening. Thus, considering the above, the project concentrated on key priorities and catalytic actions rather than trying to finance broad implementation at scale, which was not the objective. In that sense, several respondents distinguished between the adequacy of resources for a catalytic policy project and the much larger resource needs that would arise if the intention was to support deeper field-level implementation or sustained operational roll-out.

Financial resources

The evaluator reviewed the project’s activity-based financial report. The project document reported a total approved budget of EUR 1,176,740, with USD 671,140.94 received to date, of the funds received 371,971.64 has been spent, USD 217,540.45 has been encumbered, and USD 81,628.85 remains available.

Including encumbrances, the project has already spent or committed USD 589,512.09, equal to 87.8% of the USD 671,140.94 received to date.

Of this amount, only USD 119,976.97, or 17.9% of funds received has been spent or committed on the organization of activities directly linked to programmatic outputs, which is overall coherent with a capacity development project.

By contrast, USD 469,535.12, or 70.0% of funds received, is linked to project management, oversight, programme support costs and contingency. This pattern aligns with stakeholder perceptions that the project has benefited from strong management, frequent engagement with partners, and effective use of existing ILO expertise and structures – more information below.

The most advanced substantive output is Output 2.1, with USD 93,594.75 spent or encumbered, equivalent to 13.9% of funds received. Outputs 2.2, 3.1 and 3.2 remain very limited or at zero, which suggests that sub-regional capacity-building, national dialogue and cross-border learning have not yet been significantly implemented financially and may have been budget on the next tranche of the project funding. It is important to note that outputs 3.1. and 3.2. were not planned to be carried out during the first year of the project implementation, and due to the regional perspective, may also be more costly.

The above being said, the project is below the target budget expenditure for year 1 as described in Annex III of the Project proposal, especially for output 1.1. and 2.2., output 1.2. shows good planning and expenditure levels.

	Actual	Encumbrances	Planned as per Annex III for Year 1	Planned as per Annex III for Year 1 (in USD as per the May 2025 exchange rate)	Planned as per Annex III Total
Output 1.1	USD 22,500.00	USD 573.39	EUR 69,092	USD 80,488	EUR 69,092
Output 2.1.	USD 67,295.67	USD 26,299.08	EUR 69,093	USD 80,491	EUR 165,822
Output 2.2.	USD 3,308.83	USD 0.00	EUR 23,031	USD 26,830	EUR 27,637
Output 3.1.	USD 0.00	USD 0.00	EUR 0	USD 0	EUR 110.548,00
Output 3.2	USD 0.00	USD 0.00	EUR 0	USD 0	EUR 18.425,00

Human resources

The project team is composed of a Project Manager, and a half time admin and finance assistant both based in the ILO CO-Pretoria. The project does not count with staff at the country level. Given the small team, a major efficiency strength has been the project's ability to leverage existing ILO expertise, structures, and partnerships. The project has benefited from being housed within the Decent Work Team in Pretoria and supported by the ENTERPRISES/MULTI, the Research Department. As part of the Decent Work Country Team in Pretoria the project benefits from the expertise of relevant technical

and support staff, for example the communications staff. Interviewees noted that this arrangement has allowed the project to draw on expertise already present in the office rather than creating a heavier standalone structure, which would be much more costly. This appears to have been an efficient design choice, especially for a policy-oriented project. Respondents also emphasized that the project has benefited from the Project's Manager prior thematic and regional experience and networks, which allowed implementation to move more quickly than would have been possible with a newly recruited external profile.

On a similar subject, some respondents noted that the project manager was always available when support was needed and that regular updates were provided. Others highlighted that, at least at this stage, one dedicated programme officer appears to have been sufficient because the project is supported by a wider institutional team and because much of the work is policy oriented. However, this view was not unanimous. An interviewee wondered whether one programme officer is enough for a project spanning four countries with distinct institutional settings and a technically demanding agenda, even if the officer benefits from broader team support. This suggests that while the management arrangements have worked well far, if the Project were to be scale up, it may require a bigger team.

Furthermore, project management structures and coordination mechanisms were generally viewed as appropriate and effective, particularly at national level. Stakeholders often referred positively to the responsiveness, availability, and proactive engagement of the project manager. PACs and focal points have provided useful coordination structures, and communication between the project and national actors appears to have functioned reasonably well.

Use of technology

The project has also used digital technologies and online coordination in a broadly efficient way. A number of stakeholders noted positively that online meetings and exchanges made it possible to sustain dialogue across countries at relatively low cost, and that many participants had become comfortable working this way. This was particularly relevant in a multi-country project where physical travel for every coordination meeting would have been costly and time-consuming. Some respondents even suggested that certain activities could continue to rely on online formats, including regional exchanges or cross-country learning. Others noted that savings could potentially also be made through more systematic use of free or partner-provided meeting venues where in-person events are organized. Overall, the use of technology appears to have helped the project stretch limited resources and maintain continuity of engagement.

Impact and Sustainability potential

At this stage, the evaluation finds that SUSTAIN has generated early signs of impact, primarily at the institutional and policy-process level, while longer-term and more structural effects remain prospective. Concerning sustainability, the evaluation finds that focal point's governance structures need to be strengthened in order for the project results to be sustainable in the long term.

Early Impacts

The clearest early sign of impact is that the project has begun to change how trade, investment, labour standards, and responsible business conduct are understood and discussed within national policy spaces. Before the project, these issues were often treated separately, with labour actors rarely involved in trade and investment discussions. The project has helped create new spaces for cross-institutional engagement and has started to position labour and decent work concerns more visibly within trade- and investment-related dialogue. Across countries, this shift is reflected in the establishment of Project Advisory Committees, the appointment of tripartite national focal points for the promotion of the MNE Declaration, and the adoption of national roadmaps that explicitly connect trade and investment processes with decent work, policy coherence, and responsible business conduct. These are not yet deep systemic changes, but they do represent early institutional effects that are relevant to the project's intended impact route.

The evidence suggests that these early impacts are strongest where the project has moved beyond awareness-raising into practical follow-up. In **Botswana**, the roadmap and subsequent progress discussions point to focal points already coordinating around a joint workplan, integration of trade and investment issues into the DWCP discussion, the development of RBC tools for companies, and efforts to embed RBC expectations into investor-facing processes and sectoral dialogue. In **Namibia**, early impact is visible in the project's support to the Namibia Investment Promotion and Development Board (NIPDB) on labour-related clauses and decent work KPIs in investment policy, work on investor compliance tools, and the connection made with broader business and human rights processes. In **South Africa**, the project has reinforced and operationalized a pre-existing national agenda by anchoring it more firmly in institutional structures such as the PAC and the national focal points and by strengthening the link between the 2023 roadmap and subsequent policy dialogue. In **Lesotho**, the evaluation could not assess the level of impact, due to the lack of stakeholder interview data, but document review showcases that the project has helped place the issue on the agenda and created a basis for further institutional work through focal point designation and roadmap adoption.

Sustainability

The interventions are also partly structured to support sustainability, although not all sustainability conditions are yet firmly in place. The project design includes several features intended to extend benefits beyond the project lifecycle: training and e-learning tools that remain available after project completion; country profiles, studies, and briefs that can continue to inform policy dialogue; roadmaps intended to guide follow-up action beyond the implementation period; and institutional mechanisms such as PACs, focal points, and technical working groups or secretariats. The project document explicitly frames dialogue platforms, action plans, and web-based tools as results that should outlast the project. This is a strength of the design. However, the project has not designed an exit strategy.

At the same time, sustainability depends not only on the existence of such mechanisms, but on whether they become sufficiently embedded in national institutions and used by

the intended stakeholders. On this point, the evidence remains mixed and should ideally continue to be monitored.

The project has built a reasonable degree of local ownership and stakeholder commitment, which is one of its strongest sustainability assets. Interview evidence indicates a high level of stakeholder interest, beginning already in the inception phase, and suggests that ownership has been strengthened precisely because of the project's tripartite nature and its deliberate inclusion of ministries and institutions beyond the traditional ILO constituency base, especially trade and investment actors. Respondents emphasized that the fact that the project is not owned by only one institution but instead works through tripartite and tripartite-plus structures, has helped generate broader commitment and shared responsibility.

The national steering and advisory committees, as well as the focal point arrangements, have given stakeholders a role in implementation and follow-up, which will continue to be reinforced by the project through the agreement of specific terms of reference. ILO stakeholders perceive the establishment of focal points as something that goes beyond the Project. However, country stakeholder does not show the same understanding of the focal point structure, with at least half of the non-ILO interviewees having an unclear understanding of their actual responsibilities regardless of them being part of the focal points nomination lists. It is also unclear how the focal points, which range across different national structures, will work together after the project concludes. This finding showcases that although for the ILO the focal point structure showcases ownership and sustainability, for this to be factual, more work needs to be done for these actors to being able to continue to work independently without the call or logistical organization of meetings by the ILO.

Interviewees also noted that the project is beginning to shift the narrative by making clearer that European trade relations and market access increasingly require attention to fundamental principles and rights at work, and that trade and investment officials, many of whom were new to this agenda, are now becoming part of the discussion. Furthermore, stakeholders highlighted that before, when conversations on labour and trade & investments were held, was only to discuss specific trade relations with countries outside the region; while now, they have become broader, to include trade relations between African countries.

In addition, roadmaps, news items, and other outputs published in the ILO website are validated with partners before publication. This is seen as helping to formalize commitments and reinforce ownership by making decisions and agreements more visible and official. When stakeholders see something on-line, they are more likely to take these decisions seriously.

At the same time, preparedness by the countries themselves, to sustain outcomes without continued ILO support remains uneven. In **Lesotho**, for example, progress on the technical working group or secretariat remained limited at the time of review, which raises questions about whether coordination structures will become functional quickly enough to outlast the project. In **Namibia**, stakeholders raised concerns about where the project outcomes would be internalised after the project's exit and stressed the need for stronger political endorsement and institutional anchoring. More broadly, several

interviewees noted that government should not remain the only institutional anchor and proposed alternatives such as a rotating secretariat model among tripartite actors. This is an important finding. It suggests that while local ownership is emerging, institutionalization is not yet complete, and sustainability may be vulnerable if coordination remains overly dependent on the Ministry of Labour or on ILO facilitation alone.

The project also benefits from the fact that it is not a stand-alone effort. Its links with broader ILO and EU-supported work on responsible business conduct, trade, and supply chains increase the potential for continuity.

Cross-Cutting Issues

Gender equality and non-discrimination

The evaluation finds that gender equality and non-discrimination are present in the project design, however integrating this principle in implementation is linked to how integrated this is in international instruments, and even on the trade and investment agreements.

At design level, the project document explicitly identifies gender equality and non-discrimination as cross-cutting issues, links them to the ILO's strategic objectives. The project document also states that National Project Advisory Committees should seek a minimum critical balance of women members, and that communication and training activities should be inclusive.

In practice, evidence of systematic mainstreaming remains more limited at this stage. Interviewees generally recognized that the issue is relevant and that the project's responsible business conduct and labour standards agenda should, in principle, provide a strong entry point for addressing non-discrimination, equality, and inclusion. Some respondents noted that countries are themselves working on these issues and that the project comes to "supplement" these efforts. Nevertheless, most interviewees were unable to identify concrete examples of the project's integration of gender equality and non-discrimination. However, it was highlighted that in all the forums organized by the project, there is always sufficient gender representation and that all views are considered equal by the Project.

Social dialogue

The evaluation finds that the project has been effective in promoting the participation of employers' and workers' organizations and in facilitating constructive social dialogue, and that this is one of its strongest cross-cutting achievements to date.

The project is explicitly designed around tripartism and uses the ILO's comparative advantage as a tripartite institution to bring together governments, employers, and workers around issues that had not traditionally been approached through social dialogue. Going beyond the traditional tripartite approach, amongst the project stakeholders, beyond Labour Ministries, the project has also managed to bring together other Ministries and Government Agencies who are working on issues related to trade and investment.

Interview and documentary evidence strongly support the conclusion that the project has succeeded in creating and strengthening tripartite and tripartite-plus dialogue spaces. National Project Advisory Committees in Botswana, Namibia, Lesotho, and South Africa all include employers' and workers' organizations alongside labour ministries, trade ministries, and investment-related institutions. National roadmaps in the four countries also reflect a shared agenda that was developed through tripartite or tripartite-plus dialogue and that explicitly aims to strengthen participation of social partners in trade and investment matters, and the appointment of focal points for the MNE declaration also promotes social dialogue.

Interviewees repeatedly highlighted that one of the project's most valuable contributions has been to bring together actors who had not previously engaged one another sufficiently, especially labour actors, employers, workers, and ministries responsible for trade and investment. Several respondents stressed that this platform for exchange has already improved mutual understanding and created a basis for more constructive dialogue.

Advancing the implementation of International Labour Standards

The evaluation finds that the project is making a meaningful early contribution to advancing the implementation of International Labour Standards (ILS), mainly by strengthening awareness, institutional dialogue, and practical mechanisms through which standards can be taken into account in trade and investment-related processes.

The project is explicitly grounded in the ILO normative framework, with the MNE Declaration as its central operational instrument, and seeks to promote the application of international labour standards in the context of trade agreements, investment policy, responsible business conduct, and decent work outcomes. The project document and national roadmaps show that this includes focus areas such as freedom of association, collective bargaining, occupational safety and health, equality of opportunity and treatment, child labour, forced labour, labour clauses in public procurement, and broader policy coherence around labour standards.

At this stage, the project's contribution is strongest in creating the enabling conditions for improved implementation rather than in demonstrating direct changes in compliance or enforcement outcomes. Interview evidence reinforces this. Respondents pointed out that before the project, many actors knew ILO standards in a general sense but had not been using them as practical reference points in discussions with investors, trade institutions, or multinational enterprises. The project appears to have helped shift this by making the MNE Declaration and related standards more operational.

That said, implementation of ILS in the deeper sense of legal reform, enforcement, or enterprise practice remains at an early stage, and the project has not yet generated strong evidence of direct compliance changes. This is not unexpected at mid-term, but it means the project should currently be assessed as contributing to the enabling environment for implementation of ILS, rather than yet demonstrating major implementation outcomes.

Conclusions

Overall, the mid-term evaluation concludes that the SUSTAIN project is a highly relevant and strategically well-positioned intervention that addresses an important and previously under-served policy gap at the intersection of trade, investment, international labour standards, and responsible business conduct in Southern Africa. The project has responded to a real demand from constituents and institutions in Botswana, Lesotho, Namibia, and South Africa, as well as from regional actors, to better connect labour governance and decent work considerations with trade and investment agendas. Its strongest strategic value lies in its ability to translate broad ILO normative frameworks, regional commitments, and EU policy priorities into a practical platform for dialogue, capacity building, and policy engagement.

The evaluation concludes that the project is coherent in both concept and implementation, with a sound intervention logic and strong complementarity with national policy processes and related ILO initiatives. The tripartite-plus approach adopted by the project has been particularly valuable in bringing together institutions that had not traditionally worked together, especially ministries of labour, ministries of trade, investment promotion agencies, employers' organizations, and workers' organizations. Nevertheless, there remains some inconsistency between the breadth of the ambition, the number of countries covered, and the time and resources available.

In terms of effectiveness, the project has made good progress at output level and has successfully laid the institutional, technical, and relational foundations for broader outcome-level change. Important achievements include the establishment of Project Advisory Committees in all four countries, the adoption of national roadmaps, the formal appointment of national focal points for the promotion of the MNE Declaration, national and regional workshops, initial technical studies and policy tools, and the development of an online learning module. The project has been particularly effective in building awareness, mobilizing stakeholders, and opening new spaces for dialogue between labour and trade/investment actors. At the same time, the evaluation also concludes that outcome-level results remain emerging and uneven, which is consistent with the project's stage of implementation. The strongest results so far are in institutional mobilization, coordination, and agenda-setting, while more advanced policy influence, implementation effects, and structural changes are still at an early stage.

With regard to efficiency, the evaluation finds that the project team has generally managed available resources well and has made effective use of partnerships, existing ILO expertise, and digital tools to operate across four countries and at regional level. Stakeholders widely recognized that the project is relatively small in size and that implementation has benefited from strong technical collaboration and efficient use of virtual communication.

On impact and sustainability potential, the evaluation concludes that SUSTAIN has generated early institutional signs of impact and sustainability, particularly by shifting the way trade, investment, labour standards, and responsible business conduct are understood and discussed within national policy spaces. However, as stated by an stakeholder, sustainability will require more strategic approaches taken at the country level. Strengthening non-state actors to participate more meaningfully in trade and

investment and labour discussions. The project has supported coordination platforms, strengthened the visibility of labour issues within trade and investment discussions, and provided practical entry points for integrating the MNE Declaration and related standards into national processes. The project has also built a reasonable degree of ownership among stakeholders, especially through its tripartite-plus structures, roadmaps, focal point arrangements, and validated documentation. At the same time, sustainability remains promising but not yet assured. While the project has created mechanisms and momentum that stakeholders value, their continuation after project closure will depend on stronger institutional anchoring, clearer mandates, more structured follow-up, and, additional time and resources to embed the agenda into existing national systems.

Regarding cross-cutting issues, the evaluation concludes that the project is strongest on tripartism, social dialogue, and the promotion of international labour standards through dialogue and institutional mechanisms. By contrast, gender equality and non-discrimination, while clearly recognized in the project design, have so far been less visible in implementation and results.

In conclusion, SUSTAIN can be considered a valuable and timely catalytic project. It has successfully opened an important policy and institutional space, generated buy-in around a complex but increasingly relevant agenda, and established mechanisms that can support longer-term change. The main challenge for the remainder of the project is therefore to consolidate and institutionalize what has been started. If the project is able to do so, it will leave behind not only useful tools and dialogue structures, but also a model with clear potential for replication in other contexts.

Good practices

Tripartite-plus engagement is essential to integrate decent work into trade and investment processes

A key good practice of the SUSTAIN project has been the use of a tripartite-plus approach that deliberately brings together not only the ILO's traditional tripartite constituents, but also ministries and institutions responsible for trade, investment, and economic development. This approach is closely linked to the project goal of advancing international labour standards and responsible business conduct within trade and investment processes. It responds to the reality that labour-related concerns cannot be effectively integrated into trade and investment decisions if labour actors remain outside those discussions. This is particularly important because, once investment-related frameworks or long-term agreements are approved, revising them can be complex and often best avoided through stronger design and alignment from the outset, as reflected in World Bank Guidance on long-term contractual frameworks and renegotiation risks. By convening labour ministries, trade ministries, investment promotion agencies, employers' and workers' organizations, and other relevant actors from the start, SUSTAIN has helped create the conditions for policy coherence and earlier integration of fundamental principles and rights at work into investment and trade-related decision-making. This good practice is also consistent with the project's design, which explicitly

recognizes the need to engage a broader range of stakeholders beyond labour institutions alone.

This good practice is most applicable in contexts where trade, investment, labour, and enterprise-related mandates are institutionally fragmented and where labour actors are not routinely involved in economic decision-making. Its replicability is strongest when there is enough political openness to convene ministries beyond labour, functioning employers' and workers' organizations, and at least one practical national platform through which dialogue can be anchored, such as a steering committee, focal point mechanism, or social dialogue institution.

The approach is particularly relevant where countries are negotiating, implementing, or reviewing trade and investment frameworks and where there is a risk that labour and decent work considerations may be addressed too late.

At the same time, replication requires sufficient facilitation capacity, since bringing together actors with different mandates and “languages” takes time and trust-building.

Use of digital tools to support multi-country coordination and implementation

A good practice of SUSTAIN has been the effective use of digital technologies and online communication tools to manage implementation across four countries and at subregional level despite limited time, budget, and staffing. This is closely linked to the project's operational reality: a relatively small team has needed to maintain regular coordination with stakeholders in Botswana, Lesotho, Namibia, and South Africa while also supporting regional engagement.

This practice is especially useful in multi-country projects where resources are limited and where stakeholders are geographically dispersed. It works best when there is already a minimum level of digital access, comfort with online communication, and clear follow-up structures so that virtual engagement remains purposeful rather than ad hoc. A limitation is that digital engagement can exclude participants with weak connectivity, limited devices, or lower digital confidence for example workers in remote areas or of older generations, and it may reduce the depth of engagement if overused. For replication, it is advisable to combine online interaction with selected face-to-face methods.

Lessons learned

Workers' organizations may require tailored support to engage meaningfully in emerging trade, investment and RBC agendas

An important lesson emerging from SUSTAIN is that the effective participation of workers' organizations in discussions on trade, investment, and responsible business conduct may require more tailored support than is often assumed. While the project succeeded in bringing workers' organizations into national workshops, advisory structures, and dialogue processes, the evaluation suggests that these issues are not always part of their traditional areas of engagement and may therefore require additional technical accompaniment to enable more substantive participation. This

points to the importance, in future interventions, of anticipating differentiated capacity needs among stakeholders and ensuring that social partners, particularly workers' organizations, are equipped not only to attend discussions, but also to influence them meaningfully.

This lesson is relevant more broadly to projects working on emerging thematic areas, especially where the issues introduced fall outside the more traditional areas of engagement of the participating institutions. In the case of workers' organizations, this is particularly important because their role often remains centred on more established functions, such as negotiation and representation in formal industrial relations settings, frequently at enterprise level. In many contexts, including across much of Africa, trade, investment, and responsible business conduct are not yet part of the routine technical agenda of unions in the same way as wages, working conditions, collective bargaining, or dispute resolution. A key precondition, therefore, is to recognize from the beginning that participation in an emerging policy area does not necessarily mean that all stakeholders begin with the same level of familiarity, confidence, or institutional readiness. Projects introducing new thematic agendas should anticipate this and provide space for gradual learning, practical application, and repeated engagement so that participation can evolve into meaningful influence.

Recommendations

Recommendation	Actor requested to respond	Priority	Level needed of resources	Deadline
R1. Strengthen and operationalize the national focal points so they become lasting coordination mechanisms.	ILO project team, in consultation with national constituents and relevant institutions.	Medium	Medium	End of the project period

		The evaluation recognizes the appointment of national focal points as one of the project's most significant achievements to date and an important foundation for sustainability. Interviews with ILO stakeholders confirmed that this mechanism is valued and seen as a concrete result of the project. However, interviews at the country level found that stakeholders do not always share the same level of understanding regarding the focal points' practical role, expected functions, and how these should evolve beyond the project lifecycle. This does not diminish the strength of the result already achieved; rather, it suggests that the next step is to further consolidate and operationalize the mechanism so that its added value is fully realized and sustained over time. During the remaining implementation period, the project could support countries to further clarify and document, where useful, the practical modalities of focal point functioning, including their coordination role, relationship with existing national structures, expected contributions, and possible follow-up arrangements after project closure. This may include light work on terms of reference, simple country-level action planning, or clearer articulation of how focal points link to PACs, social dialogue institutions, or other national coordination mechanisms. The emphasis should be on building on the strong progress already made and helping stakeholders translate formal designation into durable and well-understood institutional practice.		
R2. Consolidate the current gains through a non-cost extension or follow-on phase focused on institutionalization.	ILO Project Team, EU	High	Medium	End of the project

		A recurring message from stakeholders is that the project is highly relevant and has created momentum, but that two years is too short for this agenda to translate into durable institutional and policy change. Stakeholders in several countries stressed that the risk is not lack of relevance, but that the project could stop before its mechanisms are fully integrated into national systems. Explore a short no-cost extension where feasible, or a follow-on phase with a narrower focus on consolidation. Priority should be given to embedding focal points, roadmaps, and dialogue structures into national systems rather than expanding the agenda too broadly.		
R3. Strengthen M&E by developing a result based indicator framework	ILO PARTENRSHIPS, ILO EVAL	Medium	Medium	End of the Project

		The evaluation of SUSTAIN found that the project's intervention logic is broadly coherent, but that its monitoring and evaluation framework is largely composed of activity-based indicators, which limits the project's evaluability. This issue is not unique to SUSTAIN and points to a broader institutional lesson: even relatively small projects should be designed with results-based and evaluable monitoring frameworks from the outset. Without this, projects may be able to report on delivery of activities but not convincingly demonstrate whether those activities have led to meaningful change in knowledge, behaviour, institutional practice, or policy outcomes. This weakens both accountability and learning and reduces the usefulness of evaluations for decision-making. The ILO should consider requiring that all new development cooperation projects, including small and pilot interventions, demonstrate before approval that they contain a results-based monitoring framework with indicators that are SMART and capable of measuring results at the output and outcome levels. Quality assurance processes could more systematically review whether results chains are measurable, whether indicators go beyond activity counting, and whether projects include realistic means of verification for the changes they seek to influence. Strengthening this requirement at the design stage will support the ILO's goal to support is core mandate.		
R4. Strengthen the operational mainstreaming of gender equality and non-discrimination	ILO Project Team	Medium	Medium	Nov 2026

		In the context of trade and investment, policy and investment decisions are often treated as gender-neutral, even though they can have differentiated effects on women and men in terms of employment opportunities, working conditions, and economic benefits. If these dimensions are not considered from the outset, there is a risk that investment-related frameworks and agreements remain gender-blind and fail to support more inclusive decent work outcomes. During the remaining implementation period, the project should work more closely with the ILO gender specialist based in CO-Pretoria to strengthen the integration of gender equality and non-discrimination into both content and process. This should include supporting ministries, investment promotion agencies, and other relevant institutions to better understand that trade and investment policies and agreements are not gender neutral. The project could also ensure that gender considerations are more explicitly reflected in training content, dialogue agendas, knowledge products, and follow-up actions under the national roadmaps. Where feasible, this should include practical guidance on how investment-related decisions can better consider women's employment and working conditions.
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ANNEX 1 – Terms of Reference



Terms of Reference

Midterm internal evaluation of the ILO SUSTAIN project

janv.2026

Key-elements	
Titles of interventions to be evaluated	Promoting decent work and capacity building for labour ministries, labour inspections and social partners to advance international labour standards and responsible business conduct through sustainable trade and investments in Southern Africa
TC Codes RAF/24/01/EUR	
Administrative Units	Decent Work Team for Eastern and Southern Africa, and Country Office for South Africa, Botswana, Eswatini and Lesotho
Countries	South Africa, Namibia, Botswana and Lesotho
Donor	EU
Total Budget	1 176 740.00 EURO
Type of evaluation	Internal mid-term evaluation (MTE)
Evaluation Timing	March 2026
Evaluation Manager	Project manager

1. Introduction and description of project

1.1. Introduction

Funded by the European Union, the SUSTAIN project (Promoting decent work and capacity building for labour ministries, labour inspections and social partners to advance international labour standards and responsible business conduct through sustainable trade and investments in Southern Africa) aims to maximize the decent work outcomes of trade and investment by leveraging international labour standards and promoting responsible business conduct (RBC). It does so by providing advisory services, facilitating dialogue, and strengthening institutional capacity among governments, employers, and workers' organizations to facilitate sustainable trade and investment in the four participating countries.

The SUSTAIN Project responds to several trends and challenges shaping trade and investment in the sub-region that affect decent work. These include:

- the increasing appearance and importance for trading partners and international buyers of sustainability clauses within trade and investment agreements
- human rights and environmental due diligence legislation in the European union
- the drive to ensure that trade and investment lead to quality and sustainable outcomes in terms of sustainable development and human rights
- the growing need to align trade and investment with national development priorities

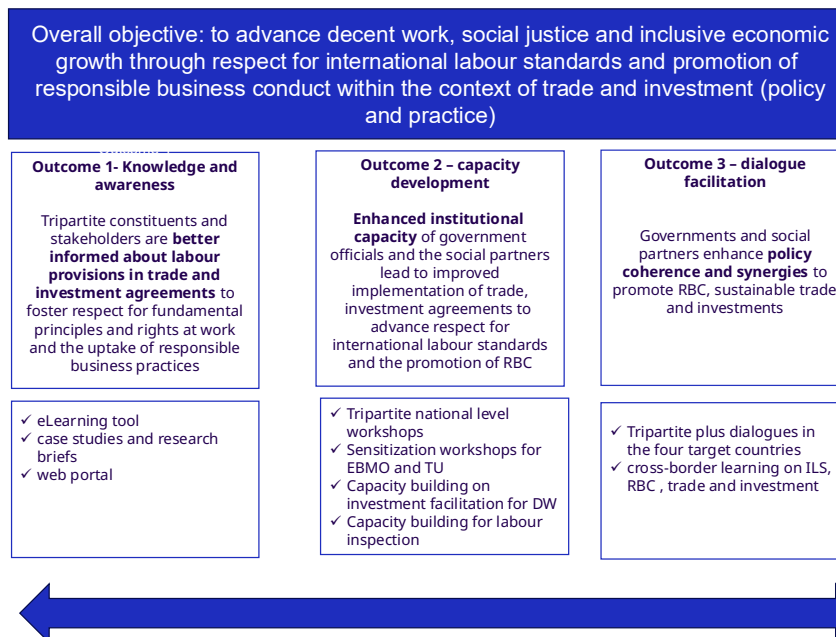
Furthermore, the SUSTAIN project is taking place against the backdrop of a volatile trade and investment landscape, affecting trade and investment flows, investor confidence, and long-term planning. However, opportunities are also emerging through the identification of new markets, a stronger push for economic diversification and industrial development, and the continued concretization and operationalization of the African Continental Free Trade Area (AfCFTA), which holds significant potential to influence regional trade dynamics and decent-work outcomes.

The project specifically aims to strengthen the ecosystem for sustainable trade and investment by promoting respect for international labour standards and responsible business conduct. Facilitating social dialogue between ILO tripartite constituents and collaboration and coordination with ministries and national development partners with a mandate in trade, investment and economic development is critical to ensure trade and investment lead to more and better jobs.

The SUSTAIN project is guided by the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy (MNE Declaration). The MNE Declaration is the ILO instrument that provides direct guidance to enterprises on social policy, responsible business conduct and decent work in supply chains. The aim of the MNE Declaration is to encourage the positive contribution of enterprises to economic and social progress and the realization of decent work for all; and to minimize and resolve the difficulties to which their various operations may give rise. To stimulate the uptake of the principles of the MNE Declaration by the various parties, the Governing Body of the ILO has adopted several operational tools that are listed in Annex II of the MNE Declaration, including the designation of tripartite appointed national focal points for the promotion of the ILO MNE Declaration.

1.2. SUSTAIN project outcomes

Sustain outcomes and activities



The projects aim is being supported by 3 interrelated outcomes

Outcome 1 aims to enhance awareness and knowledge among government officials, social partners, and other stakeholders on the linkages between trade, investment, decent work, and Responsible Business Conduct (RBC). Key activities will include:

- Developing research briefings, documenting good practices and policy analyses on decent work, RBC, trade and investment
- Creating self-guided e-learning tool on decent work, RBC, trade and investment
- Updating and maintaining a dedicated project web portal for resource sharing.

Outcome 2 focusses on institutional capacity building This outcome contributes to strengthening the capacity of stakeholders to actively integrate trade, investment, decent work, and RBC into their organizational policies, programs, roadmaps, and services. Key interventions will target Investment Promotion Agencies (IPAs), labour inspection systems and workers' and employers' organizations. Activities will include tailored workshops, training programs, advisory services and technical support.

Outcome 3: Enhancing policy coherence and multi-stakeholder dialogue. This outcome seeks to foster coherence and synergies in policy and practice by facilitating dialogue at subregional, national, and sectoral levels. Key initiatives will include knowledge-sharing events at the SADC level and national and sectoral policy dialogues on RBC and decent.

Project stakeholders of SUSTAIN include:

- Tripartite constituents of the ILO at country level
- Main actors from the world of trade and investment, including Investment promotion agencies, trade and export promotion related institutions, ministries of trade,
- The EU Delegation at country level

1.3. Main accomplishments of the project in 2025

- **Project inception and setup:** The SUSTAIN project started on 1 November 2024 with a four-month inception phase during which systems were activated, infrastructure procured, personnel recruited, and sub-regional consultations held, enabling a smooth transition to implementation in 2025.
- **Project management arrangements:** The Project Manager and Financial and Administrative Assistant assumed duty on 1 April 2025 at the ILO Pretoria Office, ensuring full operational capacity across the four target countries.
- **Early stakeholder validation:** A sub-regional stakeholder meeting held in February 2025 in Johannesburg brought together tripartite constituents from the four countries and SADC partners, who validated project objectives, endorsed the implementation strategy, and committed to active participation.
- **National ownership through PACs:** Four national Project Advisory Committees were established between May and August 2025, ensuring tripartite-plus oversight and facilitating the integration of decent work and RBC considerations into trade, investment, and development policies.
- **Strengthening the knowledge base:** A comprehensive self-paced e-learning course on trade, investment, decent work, and RBC—developed with ITCILO—is nearing completion and will be launched online in early 2026 at no cost to users.
- **Evidence and analytical tools:** The project produced a Decent Work, Trade and Investment Country Profile for Botswana, developed ILO briefs on investment facilitation and RBC, and documented a Namibia case study linking skills, FDI, and decent work.
- **National capacity-building results:** 4 national workshops were completed in 2025, reaching over 100 participants,
- **Enhancing social dialogue on trade and investment** - all four countries appointed national tripartite focal points for the promotion of the ILO MNE Declaration.
- **Policy influence and dialogue:** The project is supporting RBC integration into Namibia's draft SEZ policy, strengthening employer capacity through SME surveys and ESG training, and organizing a national dialogue in South Africa in December 2025 to advance policy coherence and implementation of RBC commitments.
- **Visibility and communication:** A dedicated SUSTAIN project webpage was developed and published on the ILO website, serving as a regularly updated hub for project information, resources, news, and events.
- **EU coordination:** Structured engagement with EU Delegations in Botswana, Lesotho, Namibia, and South Africa was established through consultations and country visits to ensure alignment with EU priorities and coordination with other EU-funded initiatives.

2. Objectives & Scope of the Evaluation

2.1. Objective of the Evaluation

ILO considers evaluation as an integral part of the implementation of its projects and interventions. The evaluations are conducted to achieve accountability, improve management and foster learning to support the knowledge base.

The overall objective of the internal midterm evaluation (MTE) is to undertake an assessment of the continued relevance of the on-going activities and their objectives; to assess the overall implementation and performance with regards to progress and results achieved against the defined outcomes.

The MTE will further identify challenges, opportunities and where necessary adjustments in implementation and management of the project both from a substantive and financial and time bound perspective.

2.1.1. Specific Objectives

The MTE will review the following areas of project design, implementation, relevance and sustainability and make recommendations for the remaining period of the project towards improving delivery and sustainability of outcomes:

- Analyse the implementation strategies regarding their potential effectiveness in achieving the project outcomes and its innovative dimension.
- Review the institutional set-up, capacity for project implementation, coordination mechanisms and the use and usefulness of management tools including the project monitoring tools and work plans.
- Assess the implementation of the project so far, identifying factors affecting project implementation (positively and negatively). If necessary, propose revisions to the expected level of achievement of the objectives.
- Assess the level of implementation efficiency of the interventions.
- Assess the extent to which the interventions' outcomes and observed impacts will be sustainable in the respective countries.
- Identify lessons learned and emerging good practices for the key stakeholders
- Review the strategies for sustainability and expansion

2.2. Evaluation Audience

The primary user of this internal evaluation is the ILO project team and implementing partners, as identified in the national project advisory committees for Namibia, Botswana, South Africa and Lesotho.

2.3. Evaluation Scope

2.3.1. Period and Scope of the Evaluation

The MTE will cover the first 12 months of implementation period of SUSTAIN Project. The evaluation will also assess the attainment of the intervention's outputs, outcomes and objectives as described in their respective logical frameworks. The evaluation will also integrate gender equality as a cross-cutting concern throughout its processes and methodological approach and deliverables (in line with EVAL guidance note n° 4), as well as tripartism, social dialogue and transition to environmental sustainability as transversal themes.

2.3.2. Geographical Scope

The MTE will cover the four countries of the SUSTAIN project - South Africa, Namibia, Botswana and Lesotho.

2.4. Evaluation Criteria and Key-Questions

The evaluation should be carried out in adherence with the ILO Evaluation policy and guidelines, as well as UNEG norms and standards. It should, as well, be guided by the OECD/DAC main evaluation criteria (relevance, coherence, effectiveness, efficiency, impact and sustainability) in addition to ILO cross-cutting criteria. The mid-term internal evaluation will be guided by the following main evaluation questions, to be refined during the evaluation design and planning stage:

Relevance & Strategic Fit - Are the intervention addressing the right issues?

- To what extent is the SUSTAIN project aligned to the needs and priorities of tripartite stakeholders and beneficiaries identified in the project documents and during implementation?
- To what extent is the SUSTAIN project aligned with the socioeconomic realities and specific challenges of each target country?
- Did the projects' design reflect a logical, realistic, and purposeful approach toward achieving their objectives in different national contexts?

Coherence - How well do the interventions fit within the broader context?

- How well do the projects complement and align with other ongoing ILO programmes in the respective countries and across the region?

- To what extent have the interventions been designed to maximize systemic and sustainable changes at national and regional levels?
- How well are the interventions aligned with national policy frameworks, regional priorities, and international commitments?

Effectiveness - Are the interventions achieving their intended results?

- What have been the major results and lessons learned during the project's implementation?
- What has been the progress made in the achievement of the project's outcomes? Have there been any changes in the specific areas defined as the project outputs?
- What are the main constraints experienced by the project (both in terms of methodology and context)?

Efficiency - Are resources being used optimally?

- Have resources available (time, funds, partnerships, knowledge, expertise and tools) been used efficiently?
- Are there any ways to enhance the efficiency?
- Have the project adequately incorporated gender and inclusion objectives within their budgeting and planning processes?

Sustainability - Will the benefits last beyond interventions' completion?

- Are the interventions' results structured to ensure long-term sustainability beyond their lifecycle?
- How effectively have the interventions built local ownership, institutional capacity, and stakeholder commitment to sustain their outcomes and impacts?
- What are the main risks to the sustainability of the interventions' achievements, and how have these risks been mitigated?
- To what extent are national institutions and implementing partners prepared to sustain the outcomes without continued ILO support?
- Have realistic and effective exit strategies been developed and implemented to ensure ongoing benefits for beneficiaries and partners?

Cross-Cutting Issues

- To what extent did the interventions mainstream gender equality and non-discrimination principles into their design and implementation?
- How effectively did the interventions promote strong and independent worker and employer organizations and facilitate constructive social dialogues?

3. Evaluation Approach and Modalities

3.1. Evaluation Methodology

The internal mid-term evaluation should comply with evaluation norms and standards, ethical safeguards, specified in ILO's evaluation procedures and guidelines (see Annex II). The ILO adheres to the United Nations Evaluation Group (UNEG) evaluation norms and standards, as well as to the OECD/DAC Evaluation Quality Standards.

The evaluation is expected to apply a mixed-methods approach, using both quantitative (where available) and qualitative data to address the evaluation questions and triangulating data sources and methods to increase the validity and rigor of the evaluation findings. The evaluation should also be participatory, engaging, as much as

feasible, with the key stakeholders of the interventions in the four countries at all stages of the evaluation process (See Guidance Note 7 in Annex II). The bidding consultants are encouraged to propose innovative approaches and methods to allow the evaluation to rigorously assess the interventions' results and impacts across the four countries, to derive holistic and integrated lessons learned on the support to formalization in Africa, as well as to formulate strategic and actionable recommendations to guide ILO future interventions on the thematic area.

The evaluation should use, but be not restricted to, the following methods:

- **Document and desk Review:** Of the four SUSTAIN interventions' documentation and literature, including the projects' documents, progress reports, monitoring reports, financial reports, relevant associated research and studies, and any other documentation related to the interventions. Preliminary findings from the desk review will be used to refine the evaluation scope, questions and methodology.
- **Interviews with the Main Stakeholders:** Remote interviews will be conducted with ILO relevant staff in the four countries, as well as with the interventions' partners, beneficiaries and key stakeholders in each country. The list of stakeholders to consult as part of the evaluation will be consolidated by the evaluation manager in consultation with ILO staff, and the evaluator will be tasked with performing any relevant sampling exercise to optimize the data collection process.

3.2. Evaluation Process

The evaluation will be conducted and managed as per the following process:

1. **Inception Phase:** An inception meeting will be organized by the evaluation manager after the completion of the hiring process of the internal evaluator and the finalization of the contract. At the end of this phase and following the desk review and preliminary interviews with relevant ILO staff, the evaluator will submit an inception report detailing the evaluation plan, including its methodological approach, its data collection tools and its timelines. The evaluation Inception Report is to be approved by the evaluation manager.
2. **Data Collection Phase:** During which the evaluator will deploy the agreed evaluation approach, including the data collection activities with the identified evaluation respondents. Interviews and other forms of consultation with the stakeholders will be conducted remotely.
3. **Stakeholders' Consultation Workshop:** To be virtually organized by ILO staff and facilitated by the evaluator, gathering the main stakeholders in each of the covered countries. During the consultation workshop, the evaluator will present the preliminary findings of the evaluation, explore the evaluation stakeholders' interpretation of the early findings and recommendations, and gather further information with the stakeholders to narrow any data or knowledge gap related to the evaluation questions.
4. **Reporting Phase:** After the completion of the evaluation data collection and interpretation, the evaluator will submit a draft evaluation report, to be reviewed and circulated by the evaluation manager to consolidate feedback and comments from the evaluation main stakeholders. A final report will be, subsequently, submitted by the evaluator addressing the stakeholders' feedback, before being subjected to quality control as per ILO evaluation guidelines and quality standards by the evaluation manager, the ILO Regional M&E and ILO EVAL/HQ. The final report should be ultimately validated and approved by EVAL/HQ.

3.3. Evaluation Management

The MTE will be implemented by a selected independent evaluator, The roles and responsibilities in the evaluation process will be as follow:

- **The Evaluation Manager** (project manager for this MTE): Will be responsible for the overall management of the evaluation process, ensuring that the evaluation is conducted as per its ToRs and initial plans and that its final deliverables are up to ILO quality standards. More specifically, the evaluation manager will:
 - Finalize the evaluation ToRs with inputs from key stakeholders.
 - Select the independent evaluator in coordination with EVAL.
 - Review and approve the inception report.
 - Brief the evaluator on ILO evaluation policies, guidelines and procedures.

- Coordinate with ILO CO teams on the data collection logistics.
- Review and circulate the first draft of the evaluation report for comments by the key stakeholders.
- Ensure the final version of the evaluation report addresses stakeholders' comments and meets ILO requirements.
- Approve the draft version of the evaluation report and submit it to EVAL for final approval.
- **The ILO Country Teams:** Will provide any logistical assistance to the evaluator as may be required and will be responsible for:
 - Providing relevant and necessary documentation on the RBSA interventions to the evaluator.
 - Preparing a list of recommended interviewees in their respective countries.
 - Coordinating logistical arrangements during the data collection phase.
 - Reviewing and providing comments on the draft evaluation reports.
- **The Selected Evaluator:** Will be responsible for conducting the evaluation as per ILO evaluation guidelines and quality standards. More specifically, s/he will be responsible for:
 - The design of appropriate and targeted evaluation approach and methodology, as well as their associated data collection tools and schedule.
 - The conduction of appropriate and agreed on data collection activities, ensuring a proper participation of the evaluation stakeholders and its main respondents.
 - The facilitation of a virtual stakeholders' consultation workshop to present the preliminary findings of the evaluation and facilitate a discussion around the evaluation recommendations and lessons learned.
 - The submission of draft and final evaluation reports in line with ILO evaluation guidelines, quality standards and templates as outlined in Annex II.
 - Address and integrate feedback and comments received on the evaluation outputs.

3.4. Evaluation Deliverables

The selected consultant is required to deliver the following evaluation outputs:

- **Inception Report:** Including a detailed evaluation approach, a detailed work plan and the associated data collection instruments. The inception report should follow ILO EVAL Checklist 3 and include:
 - Description of the evaluation methodology and instruments to be used in sampling, data collection and analysis;
 - Data collection tools;
 - Detailed fieldwork plan (virtual) for the four countries developed in consultation with the Evaluation Manager;
 - The proposed evaluation report outline.

The inception report will be reviewed and approved by the evaluation manager after being circulated to the evaluation stakeholders for their comments.

- **Draft and Final Evaluation Reports:** In English (maximum 25 pages, excluding), strictly following ILO template (Annex I) and ILO/EVAL Checklist 5 "Preparing the Evaluation Report" (Annex II). The evaluator will submit a draft evaluation report to the evaluation manager, who will have approximately seven days to consolidate both his/her comments on the analytical strength of the report, its findings, lessons learned and recommendations, as well as comments and feedback from the evaluation stakeholders. Once the stakeholders' feedback on the draft report is shared with the evaluator, he will have seven to

ten days to address all comments before sending a final draft evaluation report. The evaluation manager will again review the final evaluation report, before sharing it with the ILO Regional Evaluation Specialist for quality review. Once the final evaluation report is deemed satisfactory by the ILO Regional Evaluation Specialist, it will be submitted to EVAL/HQ for a final quality review. The evaluation report will be considered as final after its review and validation by EVAL/HQ, and the selected evaluator should be available to address comments and feedback at each step of the quality assurance process.

- **Evaluation Executive Summary:** To be appended to the final evaluation report, following ILO template (Annex II).

4. Evaluation Timelines

The evaluation process should start March 2026, after the finalization of the contract, and last approximately **20 days**. The evaluation will be conducted following the below approximate schedule:

Activity	Responsibility	Timeline	Number of days consultant	Approximate Dates
Inception Meeting with the evaluator and project manager	Project Manager	One week after the signature of the consultancy contact.	1 day	01 March
Desk Review; Preliminary Interviews Deliverable: Inception Report	Evaluator	1 weeks after the signature of the consultancy contact.	2 days	07 March
Data Collection and stakeholder consultation (remotely)	Evaluator	Three weeks after the signature of the consultancy contact.	9 days	20 March
Draft Evaluation Report	Evaluator	4 weeks after the signature of the consultancy contact.	3 days	28 March
Consolidated feedback on the draft evaluation report	Project Manager	5 weeks after the signature of the consultancy contact.	2 days	05 April
Final version of the evaluation report	Evaluator	7 weeks after the signature of the consultancy contact.	3 days	15 April
Total working days			20 days	

5. Evaluation Budget & Required Qualifications

5.1. Payment schedule and modalities

The consultancy for this final evaluation shall commence March 2026 and conclude no later than 15 April 2026 after which the contract will expire. The ILO standards for payment is output-based, and payments will be made upon the submission and approval of deliverables as outlined in section 3.4 of the present ToRs. Payments will be made following the below schedule:

- 20% for Inception Report.
- 30% for Draft Evaluation Report, and;
- 50% for the Final Evaluation Report along with the Evaluation Executive Summary.

A budget for this evaluation has been allocated to cover the evaluator's fees. The evaluation budget includes:

- Fees for the evaluator for **20 non-consecutive workdays**. The bidding consultant should provide, as part of their financial proposal, daily fees in US dollars.

5.2. Evaluator Required Experience and Qualifications

The independent evaluator will be selected following a selection process managed by the Evaluation Manager and based on proven experience and qualifications meeting the consultancy requirements. Selection will be based on the following criteria:

- A master's degree in any of the following, social sciences, development studies, economics, or other related graduate qualifications.
- A minimum of 5-7 years of professional experience specifically in evaluating international multi-country development or capacity-building initiatives, including UN projects/programmes, and with policy level work and institutional building related work.
- Experience in qualitative and quantitative approaches applied to evaluation.
- A good understanding of ILO mandate and tripartite structure.
- Experience in facilitating workshops to present and discuss evaluation findings.
- Have no previous or current involvement – or offers of prospective employment – with the ILO in the relevant countries.
- Knowledge and previous experience on trade, investment and decent work and RBC in Africa, as well as in the intervention countries or sub-regions will be an asset.
- Located in one the 4 intervention countries would be an asset
- Fluent English.

► Annex I: Structure of the Evaluation Report

The evaluation report will be structured as follows:

1. Cover Page

Containing project details (project title, project number, donor, start and end dates, budget, relevant technical sector, ILO management unit, geographical coverage) and evaluation details (type of evaluation: independent, ILO management unit, start and end dates of the evaluation mission, name(s) of the evaluator(s), date of report submission).

2. Executive Summary

3. Background, Brief Description of the Project, and Its Intervention Logic

4. Purpose, Scope, and Intended Audience of the Evaluation

5. Methodology and Limitations

6. Review/Analysis of Project Implementation

7. Detailed Presentation of Findings for Each Evaluation Criterion

8. Conclusions

9. Recommendations (including intended recipients, priority level, and necessary resources)

10. Lessons Learned and Good Practices

11. Annexes (including terms of reference for the evaluation, documents used, people interviewed, evaluation schedule, lessons learned).

► Annexe II: ILO/EVAL Guidelines & Templates

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 learned 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>

ANNEX 2 – Evaluation Timelines

The evaluation process should start March 2026, after the finalization of the contract, and last approximately **20 days**. The evaluation will be conducted following the below approximate schedule:

Activity	Responsibility	Timeline	Number of days consultant	Approximate Dates
Inception Meeting with the evaluator and project manager	Project Manager	One week after the signature of the consultancy contact.	1 day	01 March
Desk Review; Preliminary Interviews Deliverable: Inception Report	Evaluator	1 weeks after the signature of the consultancy contact.	2 days	25 March
Data Collection and stakeholder consultation (remotely)	Evaluator	Three weeks after the signature of the consultancy contact.	9 days	24 April
Draft Evaluation Report	Evaluator	4 weeks after the signature of the consultancy contact.	3 days	28 April
Consolidated feedback on the draft evaluation report	Project Manager	5 weeks after the signature of the consultancy contact.	2 days	20 May
Evaluation presentation	Evaluator		0.5 days	27 May
Final version of the evaluation report	Evaluator	7 weeks after the signature of the consultancy contact.	3 days	27 May
Total working days			20 days	

ANNEX 3 - List of interviewed stakeholders

Country Level Stakeholders	
Botswana - Ministry of Labour and Home Affairs	Tidimalo Palai
South Africa - Business Unity South Africa (BUSA)	Sanelisiwe Jantjies
Namibia Employers' Federation (NEF)	Helen Ochs
Namibia Investment Promotion and Development Board (NIPDB)	Julia Muetudhana
Association of Lesotho Employers and Business: ALEB	Lindiwe Sephomolo
Regional Stakeholders	
SATUCC	Mavis Koogoitsitse
SPSF	Eileen Van Der Est
EU representatives	
EU representative, Brussels	Oisin Murphy
EU Delegation for Namibia	Tanja Nader
EU Delegation for Botswana	Oliver Fox
ILO Staff	
Project Manager, DWT/CO-Pretoria	Karl Pfeffer
Director, DWT/CO-Pretoria	Alexio Musindo
Sr Spec, Enterprise Development and Job Creation, DWT/CO-Pretoria	Jens Christensen
Unit Head, Multinational Enterprises and RBC, MULTI/RBC	Ghita Roelans
Spec, Corporate Social Responsibility, MULTI/RBC	Josee Laporte
Sr. Economists, RESEARCH	Marva Corley-Coulibaly



Annex 4. Good Practices

Promoting decent work and capacity building for labour ministries, labour inspections and social partners to advance international labour standards and responsible business conduct through sustainable trade and investments in Southern Africa (SUSTAIN)

Project DC/SYMBOL: RAF/24/01/EUR

Name of Evaluator: Angelica Munoz Marmolejo

Date: April 2026

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
Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)	A key good practice of the SUSTAIN project has been the use of a tripartite-plus approach that deliberately brings together not only the ILO's traditional tripartite constituents, but also ministries and institutions responsible for trade, investment, and economic development. This approach is closely linked to the project goal of advancing international labour standards and responsible business conduct within trade and investment processes. It responds to the reality that labour-related concerns cannot be effectively integrated into trade and investment decisions if labour actors remain outside those discussions. This is particularly important because, once investment-related frameworks or long-term agreements are approved, revising them can be complex and often best avoided through stronger design and alignment from the outset, as reflected in World Bank Guidance on long-term contractual frameworks and renegotiation risks. By convening labour ministries, trade ministries, investment promotion agencies, employers' and workers' organizations, and other relevant actors from the start, SUSTAIN has helped create the conditions for policy coherence and earlier integration of fundamental principles and rights at work into investment and trade-related decision-making. This good practice is also consistent with the project's design, which explicitly recognizes the need to engage a broader range of stakeholders beyond labour institutions alone.

Relevant conditions and Context: limitations or advice in terms of applicability and replicability	This good practice is most applicable in contexts where trade, investment, labour, and enterprise-related mandates are institutionally fragmented and where labour actors are not routinely involved in economic decision-making. Its replicability is strongest when there is enough political openness to convene ministries beyond labour, functioning employers' and workers' organizations, and at least one practical national platform through which dialogue can be anchored, such as a steering committee, focal point mechanism, or social dialogue institution. The approach is particularly relevant where countries are negotiating, implementing, or reviewing trade and investment frameworks and where there is a risk that labour and decent work considerations may be addressed too late. At the same time, replication requires sufficient facilitation capacity, since bringing together actors with different mandates and "languages" takes time and trust-building.
Establish a clear cause-effect relationship	By bringing together labour ministries, employers' and workers' organizations, ministries of trade, and investment-related institutions early in the process, the project increased mutual understanding of how trade and investment decisions affect labour outcomes and created a shared space for dialogue on these issues. This broader participation then made it possible to integrate decent work, international labour standards, and responsible business conduct more systematically into national roadmaps, focal point arrangements, and policy discussions.
Indicate measurable impact and targeted beneficiaries	This good practice has already produced measurable institutional results. By the end of the first year, the project had established Project Advisory Committees in all four target countries, conducted national tripartite-plus workshops in Botswana, Namibia and Lesotho with over 100 participants in total, and supported the formal appointment of national focal points for the promotion of the ILO MNE Declaration in all four countries. These mechanisms have created a concrete basis for continued dialogue and coordination between labour, trade, and investment actors.
Potential for replication and by whom	This good practice has strong potential for replication in other countries and regions where labour issues are not yet systematically integrated into trade and investment governance. It is particularly suitable for contexts where ministries and institutions work in silos and where there is a need to create structured dialogue between labour, trade, investment, and social partners before policies or agreements are finalized.

Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	This good practice contributes directly to the ILO's broader strategic objective of promoting decent work through stronger policy coherence, social dialogue, and sustainable enterprise development. In the case of SUSTAIN, it is clearly linked to Outcome 4 of the ILO Programme and Budget 2024–2025, specifically Output 4.2: Increased capacity of constituents to develop more resilient, inclusive and sustainable enterprises in supply chains and responsible business conduct for decent work. It also aligns with the ILO Strategy on Decent Work in Supply Chains, which calls on the Office to support constituents in making better use of the MNE Declaration and in engaging with labour provisions in trade agreements. At country level, the approach also links upward to the relevant DWCP and Country Programme Outcomes in Botswana, Lesotho, Namibia, and South Africa, especially those related to creating enabling environments for entrepreneurship and sustainable enterprises, improving support for enterprises to achieve decent work, and strengthening constituents' capacity on responsible business conduct and supply chains. More broadly, by ensuring that labour ministries, trade institutions, employers, and workers engage jointly, this practice supports the ILO's strategic mandate across the four interconnected objectives of employment, social protection, social dialogue, and fundamental principles and rights at work.
Other documents or relevant comments	• The country roadmaps. • The letter of appointment of focal points.

GP Element	Text
Brief summary of the good practice (link to project goal or specific deliverable, background, purpose, etc.)	A notable good practice of SUSTAIN has been the effective use of digital technologies and online communication tools to manage implementation across four countries and at subregional level despite limited time, budget, and staffing. This is closely linked to the project's operational reality: a relatively small team has needed to maintain regular coordination with stakeholders in Botswana, Lesotho, Namibia, and South Africa while also supporting regional engagement.

Relevant conditions and Context: limitations or advice in terms of applicability and replicability	This practice is especially useful in multi-country projects where resources are limited and where stakeholders are geographically dispersed. It works best when there is already a minimum level of digital access, comfort with online communication, and clear follow-up structures so that virtual engagement remains purposeful rather than ad hoc. A limitation is that digital engagement can exclude participants with weak connectivity, limited devices, or lower digital confidence for example workers in remote areas or of older generations, and it may reduce the depth of engagement if overused. For replication, it is advisable to combine online interaction with selected face-to-face methods.
Establish a clear cause-effect relationship	By relying on online communication and digital coordination tools, the project reduced the cost and logistical burden of managing activities across four countries and was able to maintain regular engagement with stakeholders despite a small team and limited budget. This, in turn, helped sustain stakeholder participation, keep momentum between in-person events, and ensure that project governance and follow-up actions could continue even when travel or physical meetings were not feasible.
Indicate measurable impact and targeted beneficiaries	The project maintains very good relations with all stakeholders. The project also developed an online self-guided e-learning course and planned several online regional activities for trade and investment officials, employers' organizations, workers' organizations, and labour inspectors.
Potential for replication and by whom	This good practice has strong replication potential for other ILO technical cooperation projects operating across multiple countries.
Upward links to higher ILO Goals (DWCPs, Country Programme Outcomes or ILO's Strategic Programme Framework)	This practice supports the ILO's broader objective of delivering results efficiently while strengthening constituents' capacities and policy dialogue on tight budget environments.
Other documents or relevant comments	N/A



Annex 5. Lessons Learned

Promoting decent work and capacity building for labour ministries, labour inspections and social partners to advance international labour standards and responsible business conduct through sustainable trade and investments in Southern Africa (SUSTAIN)

Project DC/SYMBOL: RAF/24/01/EUR

Name of Evaluator: Angelica Munoz Marmolejo

Date: April 2026

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.

LL Element	Text
Brief description of lesson learned (link to specific action or task)	An important lesson emerging from SUSTAIN is that the effective participation of workers' organizations in discussions on trade, investment, and responsible business conduct may require more tailored support than is often assumed. While the project succeeded in bringing workers' organizations into national workshops, advisory structures, and dialogue processes, the evaluation suggests that these issues are not always part of their traditional areas of engagement and may therefore require additional technical accompaniment to enable more substantive participation. This points to the importance, in future interventions, of anticipating differentiated capacity needs among stakeholders and ensuring that social partners, particularly workers' organizations, are equipped not only to attend discussions, but also to influence them meaningfully.

Context and any related preconditions	This lesson is relevant more broadly to projects working on emerging thematic areas, especially where the issues introduced fall outside the more traditional areas of engagement of the participating institutions. In the case of workers' organizations, this is particularly important because their role often remains centred on more established functions, such as negotiation and representation in formal industrial relations settings, frequently at enterprise level. In many contexts, including across much of Africa, trade, investment, and responsible business conduct are not yet part of the routine technical agenda of unions in the same way as wages, working conditions, collective bargaining, or dispute resolution. A key precondition, therefore, is to recognize from the beginning that participation in an emerging policy area does not necessarily mean that all stakeholders begin with the same level of familiarity, confidence, or institutional readiness. Projects introducing new thematic agendas should anticipate this and provide space for gradual learning, practical application, and repeated engagement so that participation can evolve into meaningful influence.
Targeted users / Beneficiaries	The main users of this lesson are ILO project designers and implementation teams.
Challenges /negative lessons - Causal factors	A related challenge is that capacity gaps in emerging thematic areas are not always openly acknowledged or easy to address. Some stakeholders may be hesitant to admit limited knowledge in front of other institutions, particularly in multi-stakeholder settings where roles and status matter. Others may not immediately see the relevance of the new topic to their mandate and therefore may not prioritize learning about it. In addition, limited institutional resources can make it difficult for projects to invest in building competence in areas that are not yet perceived as core work. This can also create a risk that other partners feel unevenly treated.
Success / Positive Issues - Causal factors	A positive factor is that, when workers' organizations are given space to engage gradually and practically with a new thematic area, they can become strong contributors to the discussion even if the topic was not initially part of their traditional mandate.
ILO Administrative Issues (staff, resources, design, implementation)	The involvement of ACTRAV is particularly valuable in helping bridge this gap, ensuring that training, dialogue, and follow-up are adapted to the needs and language of workers' organizations, and strengthening their ability to engage in areas that are emerging but increasingly important for labour outcomes.