International Labour Organization

Evaluation Office

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Mid-term Internal Evaluation of the ILO SUSTAIN Project

QUICK FACTS

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

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Evaluation type: Project

Evaluation timing: Mid-term

Administrative Office: CO-Pretoria

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

This "internal evaluation" as per ILO/EVAL types of evaluation of the ILO followed a formalized evaluation process managed by an officer of the Regional Programming Unit of the Regional Office for Africa of the ILO. The purpose of internal evaluations largely serves organizational learning

BACKGROUND & CONTEXT	
Summary of the project purpose, logic and structure	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. SUSTAIN is guided by the ILO MNE Declaration and aligns with the ILO Strategy on Decent Work in Supply Chains, particularly in relation to labour provisions in trade agreements, policy coherence, international labour standards and human rights due diligence. It contributes to ILO Programme and Budget 2024–2025 Outcome 4, Output 4.2, on sustainable enterprises, supply chains and RBC for decent work. 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.
Present situation of the project	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.
Purpose, scope and clients 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 covered the implementation of the SUSTAIN project from its start until March 1st, 2026.
Methodology of evaluation	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.

MAIN FINDINGS & 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 inconsistence 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	
Recommendations	- 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
Main lessons learned and good practices	Lesson learned - Workers' organizations may require tailored support to engage meaningfully in emerging trade, investment and RBC agendas Good practice - Tripartite-plus engagement is essential to integrate decent work into trade and investment processes Good practice - Use of digital tools to support multi-country coordination and implementation