2013:10 Sida Decentralised Evaluation

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Review of Swedish Support to the World Customs Organization (WCO) Capacity Building, 2008-2012

Final Report

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Abbreviations and Acronyms

AEO	Authorised Economic Operator, compliant with SAFE Framework
AfDB	African Development Bank (sometimes referred to as ADB, but this can be confused with Asian Development Bank)
ASEAN-WEN	Association of South Eastern Asian Nations Wildlife Enforcement Network
ASYCUDA	Automated System for Customs Data, one of several global customs information systems, developed by UNCTAD and used by countries
AU	African Union, Secretariat in Addis Ababa
CAPMONQ	Capacity Building Monitoring Questionnaire
CITES	Convention on Trade in Endangered Species of Wild Fauna and Flora
ColumbusS	Project for trade facilitation, funded by Sweden and implemented through the WCO
CEN	Customs Enforcement Network (infromation/intelligence xchange facility)
EAC	East African Community, with Secretariat in Arusha, Tanzania
ECA	Economic Commission for Africa, based in Addis Ababa, regional office in Kigali
ECOWAS	Economic Community Of West African States, with Secretariat/Commission in Abuja, Nigeria
EU	European Union
FAO	Food and Agriculture Organization
GAPIN	Great Apes Integrity Project, funded by the Swedish MFA, implemented through the WCO
GCI	Green Customs Initiative
GRASP	Great Apes Survival Partnership, sponsored by UNEP and UNESCO
IFC/FIAS	International Finance Corporation/ Foreign Investment Advisory Service, part of the World Bank
IMF	International Monetary Fund
Interpol	International Police Organisation
ICCWC	International Consortium on Combating Wildlife Crime (consists of the CITES Secretariat, Interpol, UNODC, the World Bank and WCO)
IUCN	International Union for Conservation of Nature
LAGA	Last Great Ape Organisation
MEA	Multilateral Environmental Agreements
MENA	Middle East and North Africa
MFA/MoFA	Ministry of Foreign Affairs
MRA	Mutual Recognition Agreements
Norad	Norwegian Agency for Development Cooperation
NPM	National Project Manager
PASA	Pan African Sanctuary Alliance
PT	Preferred Trader (also known as Trusted Trader)
RILO	Regional Intelligence Liaison Office, Nairobi (of the WCO)

ROCB	WCO-supported Regional Office for Capacity Building
RPM	Regional Project/Programme Manager
RTC	WCO-supported Regional Training Centre
SACU	Southern Africa Customs Union, with Secretariat in Windhoek, Namibia
SADC	Southern African Development Community, Secretariat in Gaborone, Botswana
SARS	South Africa Revenue Service (includes Customs)
Sida	Swedish International Development Cooperation Agency
TRAFFIC	Wildlife Trade Monitoring Network: http://www.traffic.org/
UN	United Nations
UNCTAD	United Nations Conference on Trade and Development
UNDP	United Nations Development Programme
UNECA	United Nations Economic Commission for Africa, based in Addis Ababa
UNEP	United Nations Environment Programme
US	United States
USAID	United States Agency for International Development
WACAM	West African Customs Administration Modernisation
WCO	World Customs Organization
WEN	Wildlife Enforcement Network
WHO	World Health Organisation
WTO	World Trade Organization
WWF	World Wildlife Fund

Preface

This evaluation of World Customs Organization (WCO) projects, financed by Sweden, was commissioned by Sida's Regional Section at the Embassy in Nairobi, Kenya, and Sida's Resource Unit 1 under the Department for Programme Cooperation (PROGSAM), through the framework agreement for reviews and evaluations. The evaluation will be used to follow up the projects and to draw lessons for future collaboration with the WCO. The main aim of this assignment is to evaluate whether the projects have fulfilled their objectives.

Indevelop undertook the evaluation in late 2012. The independent evaluation team consisted of Andrea Spear (Team Leader, also part of Indevelop's Core Team of professional evaluators), Pierre Fruhling, and Sten Ström. At Indevelop, Jessica Rothman managed the evaluation process; quality assurance was provided by Ian Christoplos.

The evaluation of the Sida-funded Columbus Project encompasses three components:

1. WCO-SACU Customs Development Programme in the Southern Africa Customs Union (SACU), operational since 2010
2. WCO-EAC Customs Modernisation Programme in the East Africa Community (EAC), underway since 2008
3. West African Customs Administration Modernisation (ECOWAS (Economic Community of West African States)/WACAM (West African Customs Administration Modernisation) component which started in 2012.

This final evaluation report has incorporated feedback from both Sida and WCO on the draft report.

Unless otherwise stipulated, the Columbus Project part of this report refers to the SACU and EAC components. Where it refers to the ECOWAS component, that will be stated.

Note: This evaluation covers the Sida-funded Columbus *Project* which is part of the WCO's broader Columbus Programme, which is described in Section 2.

Executive Summary

Introduction

This Report evaluates two programmes that have been supported by Sweden and implemented by the World Customs Organization (WCO):

1. "Capacity Building Programme – Regional Implementation of the Columbus Programme Phase II in sub-Saharan Africa": Sida; SEK45.2 million; originally April 2008-31 December 2012 (**henceforth called the Sida *Columbus Project* to differentiate it from the broader WCO Columbus Programme**). It promotes customs modernisation and trade facilitation in 25 countries in Southern, Eastern and Western Africa Economic Communities.
2. "GAPIN I and II" (Great Apes Integrity Project): October 2010-March 2011: SEK1.8m; January-December 2012: SEK4.25m maximum. Initiated by the Swedish Ministry for Foreign Affairs and Trade, GAPIN targeted illegal trafficking of wildlife in 20 countries in Africa and several transit and destination countries.

The main objectives of the evaluation are to: *(a)* identify how effectively the projects have been implemented; (b) ascertain the results to date; and *(c)* advise Sida on continued collaboration with the WCO in these areas.

The evaluation of both projects took place during November and December 2012, including a two-week field mission and interviews with well over 100 people.This Executive Summary presents the key messages, findings and recommendations that emerged from the desk analyses and interviews.

The Sida Columbus Project

The Sida-funded Columbus Project has been underway since 2008, but only started to make clear progress after it was redesigned in 2010-11. As per Sida's instructions, this evaluation covers the period from 2010, drawing on the first phase (2008-2010) as necessary to illustrate lessons learned and results. This Report focuses mainly on the WCO-SACU Customs Development Programme in the Southern Africa Customs Union (SACU), operational since 2010, and the WCO-EAC Customs Modernisation Programme in the East Africa Community (EAC), underway since 2008. The West African (ECOWAS) component only started in February 2012.

Both the SACU and EAC projects are now focusing on developing the same sets of capabilities that will allow them to comply with the Revised Kyoto Convention and eventually implement regional Authorised Economic Operator (AEO) programmes and the SAFE Framework.[1] The SACU region is currently building up to Preferred Trader (PT) schemes, while the EAC is working towards a regional AEO programme. (See 'building block pyramid' in Section 2.3.) While the EAC region was more advanced in Customs modernisation and trade partnerships (Customs-Business relations) in 2010, the SACU region is quickly catching up thanks to the Sida Columbus Project (and delays in implementation in the EAC).

Relevance, Harmonisation and Ownership

The Sida **Columbus Project** is highly relevant and aligned with international, regional and national Customs and trade facilitation objectives and priorities. The Project's activities since 2010 target well-defined needs, are demand-driven and are generating change. In the SACU and EAC regions, Customs authorities are working together more closely to define regionwide policies and guidelines, and to harmonise national rules and practices with them. Commitment to modernisation is strong among Customs Directors, a number of whom are 'championing' the cause and endeavouring to overcome barriers to change.

Sustainable impact will depend on the consolidation and institutionalisation of capacity that has been built to date, as well as further progress in three areas that many interviewees listed as 'top priority', even 'urgent': (1) fostering 'buy-in'; (2) improving customs-stakeholder relations; and (3) harmonising with other donor activities. This was a common message from all three regions.

Ownership and stakeholder relations remain big challenges for the Project, although the situation has improved since 2008-2010. While the Project *per se* is widely accepted and appreciated by the SACU and EAC Customs officers who are directly involved, the changes it inspires meet resistance at different levels of Customs and even in the trading community. This is due to incomplete understanding, inadequate communications, and insufficient participation in the designing and implementing of reforms. While resistance to change is a challenge in any major reform effort, interviewed stakeholders believed the Project (and RECs) could do more to address the specific issues listed.

Results-oriented, highly targeted communications and relationships management strategies will be essential for both SACU and the EAC in 2013 and beyond. An integral part of each communications strategy should be a permanent, dedicated, up-to-date website or webpage. For optimum regional consistency and common understanding, it may be more efficient and effective to develop a single Project Communications Strategy and a common website/webpage design and common terminology for the whole ESA region.

[1] The AEO concept is part of a broader SAFE and RKC compliance strategy to reward compliant traders with benefits that simplify and facilitate trade.

Quality and Coherence of Design
The original 2008 Project design was too broad and far-reaching, and was possibly overwhelming, not only for the target recipients but also for the project managers. The pre-design analysis, theory of change, consultation and risk analyses were inadequate, and considerably underestimated the challenges, the amount of groundwork and the organisational effort required to take the Project forward. No benchmarks, baselines or appropriate performance indicators were built in to guide and monitor progress.

This was one of the WCO's first major capacity-building endeavours, and both Sida and the WCO learned enough in the first two years to totally reconfigure the Project in 2010. Further tightening in 2011 led to a more logical sequencing of activities that focusing on more manageable goals in risk management, audit, IT connectivity and trader partnerships (Preferred Trader/AEO initiatives) in SACU and EAC, and in management capacity in ECOWAS.

Implementation Efficiency and Effectiveness
In the EAC and SACU, both Customs officers and external observers acknowledged that the Project is playing an important role in helping Customs administrations move steadily toward the desired outcomes and specific objectives. Customs officers spoke very highly of the WCO-facilitated experts.

Project implementation was slow in 2008-2010 due to the need to establish the groundwork and build a constituency for change. While the momentum has improved measurably since 2011, improvements in a number of areas are still needed. The WCO's expert evaluations of performance against plans, promised in the 2008 and 2010 proposals, did not take place. The management undertakings in the two proposals (sections 9.5-9.7) were not fully implemented, nor was the management approach in the second proposal revised to reflect lessons learned in 2008-2010. Thus, weaknesses in results-based management, programme organisational structures, strategic and financial planning, reporting, monitoring, performance management and communications need to be addressed.

The lack of results-based planning and reporting, and of baselines and practical indicators, made it difficult to conduct a systematic analysis of performance against plans in the SACU and EAC components. However, because both planning and reporting have been more focused on *practical* priorities since 2010, progress is now easier to track.

Some lessons can be learned from the Sida Columbus Project's experience with organisational structure. The SACU project has been better managed from the outset. This is due to two factors:

1. Established in 2010, the SACU project is located in the SACU Secretariat Revenue Management and Trade Facilitation Division, where the Regional Programme Manager (RPM) has parametres and a support infrastructure (including supervisor, colleagues and accountant).
2. The Sida WCO project officer in Brussels has overseen the SACU component for several years, devoting considerable time to mentoring and training the RPM and the associate officer.

By contrast, efforts to place the Project Office in the EAC Secretariat have been unsuccessful, for reasons that are not entirely clear. The EAC RPM is housed in an independent Project Office in Kampala, with a part-time administrative assistant. A succession of Brussels-based project officers did not provide sufficient mentoring or supervision. This, among other things, led to recurrent delays in the implementation of activities, including the AEO pilot and Steering Committee meetings, and provoked a special WCO mitigation plan, including applying lessons learned in SACU project management to the EAC PMO.

In West Africa, the ECOWAS Secretariat had no interest in housing the Project either. So the RPM, who started working in February 2012, is at the WCO Secretariat in Brussels. He was to be based in Côte d'Ivoire, but that was cancelled due to civil unrest. To provide a regional support structure, the Steering Committee includes the key Customs capacity-building entities in the region (Regional Office for Capacity Building, the two Regional Training Centres (RTCs)), two representatives from the ECOWAS Commission and an officer from Senegal Customs (the RTC directors are seconded from Nigeria and Burkina Faso Customs). This structure helped ensure that the initial capacity-building activities (starting in October 2012) took place. Since the project will focus mainly on national assistance from 2013, a more formal regional structure may not be necessary.

Results to Date and Outlook
In the SACU and EAC regions, feedback from Customs and a broad range of stakeholders indicates that the Project has contributed strongly to customs reforms in the past 3-5 years. Customs officials at all levels gave a common message: "*Before, we didn't have a clear understanding or the wherewithal to modernise and apply good practices, Now we have knowledge, policies, structures, systems, networks and skills. The Columbus Project has given us a systematic approach and a framework for change.*" Business people and traders reported that in the past five years they had observed positive changes in Customs mindsets and practices, including integrity.

The Sida Columbus Project, since 2010 – and particularly since 2011 – is making measurable progress toward the desired results in Southern and Eastern Africa. In the ECOWAS region, the capacity-building activities only started in October 2012 and will continue to 2014. In all three cases, targets set in 2010 are not likely to be met until 2014 or later.

State of Play, Results Outlook for SACU and EAC Components at December 2012

- SACU region is preparing for two IT Connectivity pilots in 2013; regional connectivity proposal will follow.
- SACU region is preparing for a Preferred Trader pilot in 2013 (midyear or a bit later): have identified benefits, selection criteria, tentative sites; but will still need to identify participants and deal with technical, ICT and information exchange details.
- SACU implementation of the Preferred Trader scheme will probably take 2 years or so (eg, until end-2014).
- SACU implementation of AEO is likely to take another 2-3 years after that (eg, until 2016-17).
- The EAC region is preparing for its AEO pilot(s) in 2013: have identified potential participants, benefits, sites; working on identifier and other technical, ICT and information exchange details.
- Full implementation of regional AEO **is** likely to take another 2 years after that (eg, until 2015).

The key messages regarding needs and priorities were remarkably consistent across the stakeholder groups, thus providing a strong basis for considering the way forward, in terms of building on strengths and overcoming obstacles.

The one-year extension for the SACU and EAC components, granted by Sida in December 2012, will provide vital support for the Preferred Trader and AEO pilot activities, which in turn will set the foundations for regional trade facilitation and compliance with SAFE, RKC and regional requirements. **Full regional implementation of the Preferred Trader and AEO programmes (over the next five years) would represent major progress towards achievement of the Sida Columbus Project's objectives and desired outcomes,**[2] because it will mean that the 'building blocks' will have been institutionalised and made operational.

Next Steps – for 2013 and beyond

At the Project level, results-oriented strategic planning and performance management, as well as in communications and stakeholder relations require priority attention from early 2013. The Regional and National Project Managers (RPMs, NPMs), and the PT/AEO teams will need medium-term hands-on mentoring and monitoring (not just training and guidance) by ***professionals*** in these issues. The success of the pilots and of the Sida-funded Columbus Project in SACU and EAC will depend on this.

Customs officials and other stakeholders also said that their priority needs for 2013 included:

- in-depth analysis on costs and benefits of customs modernisation for their countries (showing how trade facilitation can actually increase revenues, providing an institutional incentive to reform)
- benchmarks (eg, of effective Risk Management Units, or Customs-Business Fora)
- baseline data, so that they can aim for and demonstrate tangible results.

These elements, they said, more than anything else, would encourage 'buy in', overcome resistance to change and support sustainable change.

If Sida and the WCO wish to pursue a subsequent project for SACU and the EAC, it will be important to undertake a new needs assessment after the Preferred Trader/AEO pilots in 2013, and use that – and lessons learned from 2008-2012 – to design a well-structured programme focused on practical activities and tangible results that will help the two regions achieve their objectives and foster coherent Eastern and Southern Africa (ESA) integration over 2014-2017. The 'desired outcomes' of the current Project would remain valid for another 3+2-year programme, but the specific objectives and activities would have to be recast to focus on practical ***implementation***, including targeted national assistance for weaker members, and national pilots where the results could be replicated regionally.

[2] Customs modernisation and compliance with SAFE Framework and Revised Kyoto Convention.

Once the needs and specific objectives and results were determined, the right programme structure and resourcing could be designed. The SACU approach seems to work well for that region, but the EAC approach needs to be totally reworked in close consultation with the Steering Committee members and other key stakeholders. The EAC Secretariat may or may not be the right host organisation; all options should be explored against clear criteria. A stand-alone project office does not appear to be a good solution for future Sida-WCO projects.

Regarding ECOWAS, it is not clear how the assistance can achieve measurable regional impact by the end of 2014. Downsized to management capacity building, its demand-driven, open-ended nature are perhaps more suitable for the overall WCO Columbus Programme than for a donor-funded project that requires a clear time-bound results framework. Although the design and management of the new ECOWAS project are more professional and results-oriented than the previous one, careful monitoring will be necessary to ensure that scarce funds are being used effectively, compared to other Sida Columbus Project priorities.

Recommendations for Sida

1. The Sida Columbus Project has tested the Sida-WCO relationship. Lessons have been learned on both sides. The Review Team believes that if the Project progresses well in 2013 (ie, the pilots and other activities listed under the Checklist below are implemented successfully), then Sida should consider supporting the subsequent stage, as described in 'Next Steps' above.
2. 2013 will be an opportune time to commission a thorough analysis leading to criteria and options for deciding on whether and how to proceed in a subsequent phase. This could include a mid-term review of the ECOWAS component in late 2013 to determine if it is proving to be an effective and efficient use of Swedish funding.
3. Any such analysis should explore how gains could be consolidated through further regional cooperation initiatives.
4. If Sida decides to fund a subsequent stage, then it may wish to commission a comprehensive 'pre-audit' of the capacity of both the WCO and the programme management entities (be they REC Secretariats or other parties).
5. Sida may also wish to consider simply funding specific activities that could have a clear impact (eg, risk management, coordinated border management, enforcement and preventative measures, women in border trade, supply chain security, etc).
6. Sida/WCO may wish to consider further cooperation with TradeMark Southern Africa and TradeMark East Africa, as well as with Corridor managers.

The GAPIN Project

Brief background

In August 2010, the Swedish Ministry for Foreign Affairs approved a proposal from WCO for a project aimed at combating illegal trade in wildlife, particularly concerning Great Apes, in 15 African countries. The project was named GAPIN, reflecting both the concentration on *Great Apes* and the emphasis given to enhance *In*tegrity (anti-corruption) within Customs. The budget amounted to €200,000 (some SEK 1.8 Million) and covered the period from September to end-December 2010.

The specific objectives included the following:

- Build capacity among Customs officers for enforcing the Convention on Trade in Endangered Species of Wild Fauna and Flora (CITES) at the borders
- Prevent, investigate and repress illegal trade in protected wildlife
- Promote communication and cooperation among the participating countries
- Enhance integrity in Customs in relation to wildlife enforcement.

These objectives were to be achieved through two training workshops and one joint border operation (with all project countries participating). The project ended in March, 2011 and was perceived as a success, which was why a second phase was soon proposed by the WCO.

The new phase covered the period January-December 2012, and had a budget of €490,000 (SEK 4,25 Million). Now, the scope of animal species was broadened; apart from the illegal trade in Great Apes, the project would also target elephants (ivory), rhinoceros (horn), pangolins and other threatened species. Also the geographical coverage was expanded and came to include 20 African countries.

Apart from the adjustment in the emphasis of the project's overriding goal, the contents of the specific objectives during Phase II basically remained the same, as did the main instruments for achieving the expected results – training workshops and joint border operations. The Final Report from this phase of GAPIN is expected before the end of March, 2013.

Main findings and conclusions

(i) The initial purpose of the project has not been consistently in focus, and goals have changed considerably over time. In practice, the main justification has evolved from *"A project aimed at making a specific contribution for the saving of the Great Apes"* to *"A project enhancing capacities for the full enforcement of the CITES Convention"*.

(ii) The insufficient clarity in project objectives combined with the absence of criteria for measuring performance have implied that goals and objectives have been of limited use as steering instruments. The lines of action comprised by the project (training workshops, joint border operations) have not been fitted to the established goals in order to increase prospects for goal attainment, but have rather become activities of their own, and, to some extent, goals in themselves.

(iii) There is a considerable incongruence between the project goals, on the one hand, and the design and time horizon, on the other. Taken together, the two phases of the GAPIN Project have had a maximum budget of some € 700,000, and were supposed to actively involve authorities within 20 countries located all over the African continent – all within less than 18 months. The only instruments for achieving the expected results were to be five or six training workshops, two joint border operations and some limited activities related to promotion and communication.

(iv) The project design was not linked to a concrete problem analysis, addressing neither institutional realities nor current characteristics of wildlife trafficking. The specific objectives of the project reflect the view that the best way of combatting wildlife trafficking is to apply the CITES Convention and that current deficiencies in this respect are due mainly to a lack of knowledge within Customs, in combination with a certain degree of corruption. However, nothing is said about the root causes for the situation up to the present time. Why has CITES hitherto been of low priority in the selected African countries and what is the current magnitude and structure of wildlife related corruption? The assumptions that the lack of enforcement capacity can be reduced to a knowledge problem and that corruption can be handled through awareness raising among frontline officers are hardly plausible. Consequently, the project's theory of change becomes unconvincing.

(v) The internal learning process has been under-attended, as well as critical analysis concerning the implementation process in relation to the desired goals. This may explain why the experience from the first phase of the project (GAPIN I) – which should be considered a pilot phase – was not sufficiently analysed and used to inform the design process for GAPIN II. Another case in point was the Project's international meeting in Lusaka in December 2012 where, discussing experience so far and proposals for the future, no questions were explicitly formulated by the conference management on themes such as problems faced or relevant shortcomings identified.

(vi) Ownership in institutional terms is still, at best, incipient. The GAPIN Project was started because it corresponded to a direct political interest from the Swedish government. For this reason, the WCO was contacted and agreed to elaborate a project proposal. Not until the project had been approved were the National Customs Administrations in the 15 African countries (which had been previously selected) invited to participate in the project. During the implementation, conditions have not been conducive towards a real change in the ownership situation. Finally, the project was managed from the WCO office in Brussels, with no steering body including representatives from the involved countries. Participation from customs officers in training workshops and border operations has generated interest within their circles, but ownership in institutional terms is still to be built.

(vii) Prospects for reaching the expected results within the defined time period and with any reasonable degree of sustainability are meagre. This follows partly as a consequence of the mismatch between goals, design, time span and provided resources, as well as the shortcomings concerning the definition of expected results. It is then further reinforced by the lack of national institutional ownership and the reduced circle of national actors involved so far.

(viii) In spite of all its shortcomings, the project has generated considerable interest among Customs officers and gained positive response from several international actors within this field. A more detailed analysis of the GAPIN experience may thus suggest possible continuations of different kinds of activities for enhanced efforts against wildlife poaching and trafficking.

The first seven findings – related to shortcomings and weaknesses – are judged to be the result of two major reasons. *Firstly*, the fact that the project came into being more as a campaign for transmitting political messages (considered important by the Swedish Government) than as a normal development project. *Secondly*, the lack of analysis and contextualisation of the problem (generally the responsibility of the implementing agency) in order to arrive at a more realistic approach (on part of the WCO). The eighth and last finding is interpreted as an encouraging indication concerning the prospects for gaining professional engagement within Customs, and – at the international level - as a reflection of the need for efforts of combatting wildlife trafficking to involve Customs officers who are also at the frontline.

Recommendations

1. *The first recommendation is not to prolong or continue the GAPIN Project in its current form*, due to the shortcomings in the project design and the lack of prospects for achieving effective and sustained results. A planned phasing out period is proposed, during which the experience gained can be analysed, preferably in a joint effort shared with international organisations that have been involved.

2. Should there be an interest to continue supporting efforts against wildlife trafficking that originates in Africa, it is, furthermore, strongly recommended that the process first should include a *mapping and analysis of already existing and planned initiatives.* All potential proposals for new Swedish support or initiatives should depart from the fact that preventing illegal trade in threatened species is a very complex endeavour, which recently has become even more difficult due to a fundamental shift in the structure and operation of wildlife crime. Future interventions must seek innovative ways of how to effectively address this new situation.

3. A first question in this context will thus be whether Sweden wants to concentrate on *efforts mainly designed for making a difference concerning wildlife trafficking* or rather introduce efforts related to this specific theme in programmes with another focus – such as, for example, in already ongoing customs modernisation programmes (such as Sida's Columbus Project, for instance), where the enforcement of existing rules (such as the CITES Convention) could be one of several indicators, with positive side-effects concerning wildlife management.

1 Introduction

1.1 PURPOSE OF THIS REPORT

In October 2012, Sida commissioned Indevelop to conduct an evaluation of two projects being funded by Sweden and implemented by the World Customs Organization:

1. 'Capacity-Building Programme – Regional Implementation of the Columbus Programme Phase II in Sub-Saharan Africa': referred to in the ToR as the '*Regional Columbus Project*': SEK 45,2m, 1 April 2008-31 December 2012.[3] Sida's **Columbus Project** focuses on customs modernisation and trade facilitation in 25 countries in Eastern, Southern and Western Africa Economic Communities.
2. 'GAPIN I and II' (**G**reat **Ap**es, **In**tegrity Project): €200,000 (SEK 1,8 million) in 1 October 2010-31 March 2011; SEK 4,25 million in January-December 2012. Initiated by the Swedish Ministry of Foreign Affairs and Trade, **GAPIN** targets illegal trafficking of wildlife in 19 countries in Africa, and numerous transit and destination countries. Sida may assume responsibility for GAPIN in 2013, should the Government decide to continue its support.

This Report addresses the <u>overall objectives of the evaluation</u>, as set out in the ToR (Annex A):

1. To identify how effectively the two projects have been implemented and what the results are (including any poverty-reducing linkages and effects)
2. To advise Sida on continued collaboration on the two projects
3. To analyse what has worked well and what has not, and provide the WCO and Sida with suggestions for improvements in future project design, implementation, follow-up and evaluation.

Under these global objectives, the ToR set out ten <u>specific objectives</u> to be pursued "to the extent possible":

1. Assess the extent to which <u>ownership</u> has been ensured. This includes, but is not necessarily limited to, the involvement of stakeholders in project initiation, design, implementation and follow-up.
2. Evaluate the <u>efficiency of the implementation</u> of the various activities and processes included in the two projects.
3. Evaluate the <u>effectiveness of the implementation</u> of the pilot projects by assessing inputs, outputs and outcomes against the targeted project results.

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[3] In mid-December 2012, Sida decided, based on information to date, to extend its support of the Columbus Project to end-2013. Since considerable funding was unspent from 2008-12, the extension was granted on a no-extra-funds basis.

4. Assess whether the projects are cost-efficient overall.
5. Evaluate the management effectiveness of the WCO and its network of experts in implementing the projects (including WCO's capacity to plan, implement, follow-up and report on the projects).
6. Assess the ability of Sida and the WCO to ensure an appropriate phase-out of their involvement.
7. Evaluate the Sida Columbus Project's performance in preparing countries in the East African Community (EAC), the Southern African Development Community (SADC) and the Economic Community of West African States (ECOWAS) regions for future customs unions.
8. Assess whether results achieved are likely to be sustainable.
9. Formulate recommendations on how to improve the design and implementation, and thereby performance, of future similar projects.
10. Recommend to Sida whether or not to continue collaboration with the WCO on the two projects.

1.2 EVALUATION SCOPE

While the evaluation was to cover two projects: Columbus and GAPIN, Sida instructed the Reviewers to give priority to its Columbus Project, as it represented by far the larger Swedish investment and commitment. In addition, Sida had to take important decisions on it before yearend.

Given the considerable scaling down of the Sida Columbus Project since 2008, Sida instructed the Reviewers to use the December 2010 proposal, agreement and log-frames/activity plans, as the basis for the evaluation of progress against desired results. The Review Team nonetheless agreed to draw some comparisons with the original proposal in order to provide a more complete picture, particularly in terms of lessons learned.

Within its Columbus Project, Sida wanted the evaluation to concentrate on the *regional* support to Southern, Eastern and Western Africa, respectively - not on the bilateral components (Ethiopia, Liberia and Swaziland). Nevertheless, Sida was interested in some feedback on its targeted aid to help the weaker links in the regional chain strengthen their customs administrations. The lessons learned in such bilateral assistance could be applied to the region as a whole and to other regional programmes.

In the interest of space, the Review does not repeat the background on the WCO's structure and modus operandi that were included in the Midterm Review in 2010.

1.3 METHODOLOGY

The Review Team was comprised of Andrea Spear (Leader), Sten Ström (Senior Evaluator until 16 November) and Pierre Fruhling (Senior Evaluator from 20 November). The division of labour was as follows: Ms Spear: overall management, report writing, and evaluation of the Sida Columbus Project; Mr Ström: desk review of financial reports, West Africa workshops, and GAPIN I; Mr Fruhling: review of the West Africa component and GAPIN, and report writing.

The approach comprised desk analysis and extensive interviews. (See *People interviewed*: Annex B and *Documents Consulted*: Annex C.) Most of the interviews were conducted in person; a few were by Skype, telephone or email. The interviews were semi-structured, using tailored questionnaires to guide discussions. Aligned to Sida's evaluation guidelines and OECD/DAC principles, the analysis and interviews focused on the 'specific objectives' in 1.1 above and on the questions raised by Sida in the ToR (see Annex A).

1.3.1 Theory of Change Approach to this Evaluation

Sida's Columbus Project

Due to inadequate analysis, a weak planning and results framework, little baseline information or indicators, and several revisions of the project between 2008 and 2011, it was necessary to unpack and reconstruct the theory of change in order to map the way to the desired outcomes – and therefore know what to measure and how. This included identifying the activities and milestones necessary to achieve those outcomes, and the contextual factors (political, economic, institutional) that might affect implementation of activities and their potential to deliver the desired outcomes.

While some of these milestones and contextual factors were included in the original and revised proposals, the inadequate strategic and risk planning made it necessary to take a new look at the main factors influencing the way forward. It was then necessary to ponder how all the contextual factors and activities might link together to over the medium and longer run to deliver the long-term objectives of compliance with the RKC and SAFE. A vague theory of change can lead to mismatched expectations, and a key challenge in the Sida Columbus Project was managing expectations. This analysis was combined with that of the documented and anecdotal evidence and experience to study if the activities foreseen by the WCO would plausibly lead to desired outcomes. The objective was to construct a workable theory of change that would be specific and complete enough to be able to track its evolution and progress in a credible fashion. One tool was to assemble the building blocks that would lead to very important milestones on the way to the overall objective (the Preferred Trader (PT) and Authorised Economic Operator (AEO) programmes). This then provided a practical roadmap of sorts to begin evaluation of progress toward the objectives, and the attribution possible for the role of Sida's Columbus Project in that progress.

A participatory process was launched to analyse key political, institutional, economic and technical issues, and test the hypotheses. Key questions concerned regional dynamics, political and institutional commitment, and the institutional, human and technical capacity of the WCO and the regional Customs services and RECs to carry out the programme, not only to date, but also to the very end of the roadmap. The objective was to determine the baselines, the key success factors, the challenges, the strengths to build on, and the obstacles, weaknesses and failures to overcome in pursuit of sustainable and valuable outcomes. In short – to determine how all the multiple threads should come together to deliver the desired outcome of first the PT/AEO pilots, then the regional programmes, then full compliance with the relevant international agreements. In other words, it was important to understand how some activities might create the conditions or capabilities for achieving interim targets (eg, pilots), and how their outcomes and lessons learned would influence the design of the next set of activities and the participants' readiness to continue with them (eg, applying lessons learned to capacity development, designing and implementing the regional programmes).

In order to co-construct as complete a picture (theory of change) as possible, from different levels, perspectives and experiences, the participatory process involved interviews and brainstorming sessions with more than 100 people representing all stakeholders in customs modernisation and trade facilitation (see meeting programme in Annex B). They included the WCO project, financial and human resources managers; Customs Directors, Customs project, human resources and IT managers; Customs border officers; WCO Regional Programme Managers, Columbus National Project Managers (NPMs); external experts; private sector association directors; large, medium and micro-traders; managers of other similar donor projects; officers of international organisations; heads of private sector associations; officers of Regional Economic Commissions; academics; etc. It proved to be a valuable deliberation exercise for all.

GAPIN Project

The methodology assessed the plausibility of the overall theory of change of the project in the documentation and how this theory of change was perceived by different sets of stakeholders. A theory of change had to be reconstructed due to the weak results framework that had been used in the project and the lack of documented analysis behind the considerable widening of the scope of the project between the two phases. This reconstructed theory of change was then used as a basis to undertake a critical analysis of the sphere of influence of a limited project such as this in such a wide geographic area and within the prevailing institutions that steer decision making. This was used to analyse the likely results and the likelihood of sustainable and significant outcomes within these organisations, among the specific staff reached and within their overall institutional structures.

1.3.2 Work Programme

The Work Programme encompassed the following activities October to December:

1. Analysis of initial documents provided by WCO and Sida, and additional background information from the internet and other sources
2. Preparation of detailed questionnaires for intial meetings with WCO and Sida
3. Meeting with WCO officers involved in Columbus, GAPIN and Sida-related project management at WCO head office in Brussels (4 October)
4. Teleconference with Project Managers at Sida head office in Stockholm (8 Oct)
5. Perusal of many more documents sent by WCO and Sida in mid-October
6. Preparation of the inception report (submitted 23 Oct; approval received 30 Oct.)
7. Discussions in Geneva with CITES (GAPIN) and United Nations Conference on Trade and Development (UNCTAD) and World Trade Organization (WTO) Trade Facilitation Division (mid-November).
8. Preparation of the field mission: logistics, meeting organisation (via email), creation of tailored questionnaires for each set of interviews (1-16 November).
9. Two weeks field mission to South Africa, Namibia, Botswana, Kenya, Rwanda (Team Leader: 17 Nov-1 Dec); Kenya, Rwanda, Nigeria and GAPIN debriefing in Zambia (Sr Consultant: 25 Nov-6 Dec). Interviewed well over 100 people.

10. Checking and double-checking, with a variety of sources: project assumptions, facts, figures, findings, praise, complaints, recommendations, etc, to ensure accuracy, relevance and usefulness.
11. Follow-up and report writing (from 11 December).
12. Submission of draft report for comment to Sida and WCO (January)
13. Submission of final report (February).

The aim of the field mission was to secure the most compehensive picture possible of Sida's Columbus and GAPIN Projects in the short time allocated (2 weeks for each of the two evaluators). The top priority was to interview a representative selection of Regional and National Project Managers, as well as Steering Committee Members and Customs officers involved in the Projects and border post operations. The Team also placed high priority on interviews with the private sector, other relevant aid programmes, and regional and international organisations. Sida had requested the Team to provide as much primary feedback from the region as possible. Hence, quotes from interviews are used to illustrate key points throughout this Report.

Countries were selected on the basis of a critical mass of available stakeholders, the accessibility of a relevant border post, and the practicality of logistics. Missions were timed to coincide with relevant multiplier events (i.e., the Southern African Customs Union (SACU) Steering Committee meeting in Botswana on 22 November and the GAPIN debriefing in Zambia on 5-6 December).

The Nairobi-based Sida representative, Ms Maria Liungman, accompanied theTeam Leader to **Namibia, South Africa** and **Botswana**. We interviewed some 40 people in these three countries and attended the SACU Steering Committee Meeting. The Team Leader visited a Botswana-South Africa border post while Ms Liungman attended Sida's annual meeting with the WCO representatives who had come for the SCM.

The Senior Evaluator for GAPIN and West Africa joined the Team Leader in **Kenya** and **Rwanda.** We interviewed another 40 people, including more than 10 for GAPIN, and visited the Rwanda-Tanzania border post. The Senior Evaluator then went to Abuja, **Nigeria**, for two days of interviews on GAPIN and the Western Africa component of Sida's Columbus Project. He ended his field mission in Lusaka, **Zambia**, at the 2-day debriefing on the GAPIN II border operation that took place in October.

Considerable follow-up work took place after the field mission, including collection of documentation and additional interviews with Regional and National Project Managers, and the WCO.

By the end of December, the Team Leader had interviewed more than 90 people and the Senior Evaluators more than 40.

1.4 CHALLENGES AND LIMITATIONS

The ToR was highly ambitious, requiring evaluation of four projects[4] in an 8-week period, with field missions to Brussels and three regions of Africa, interviews with dozens of stakeholders, and review of hundreds of pages of documentation. The range of issues and questions to be covered was extensive. However, Sida showed welcome flexibility, both in the evaluation design stage and during the evaluation which enabled the Review Team to deliver a better report than would have been possible under the original ToR.

As agreed following the inception report, this evaluation was undertaken on a 'best-efforts' basis, given:

- The limited timeframe and budget
- the lack of baseline data,
- no well-defined results frameworks
- no clear performance indicators
- insufficient results documentation for the most recent year's activities during the period allocated for desk analysis

Due to the time constraints, field missions could be undertaken in only six of the 25 Sida Columbus Project countries and five of the 20 GAPIN Project countries.

1.4.1 Challenges affecting efficiency and effectiveness

Time. The two weeks originally allocated for the field mission allowed sufficient time for interviews in six countries. This was not enough time to get an in-depth insight into progress and lessons learned in programmes spanning 25 countries. The one-month extension of the evaluation deadline allowed the Review Team to undertake additional research and follow-up after the completion of the field work which was highly useful.

Access. The one-day SACU Steering Committee meeting in Gaborone offered an opportunity to hear all five Customs Directors discuss key issues driving or impeding progress, but the discussion on management issues (e.g., NPMs' role) and ways forward took place in a closed session excluding the Reviewer and the Sida representative. Similarly, the Team member who attended the GAPIN meeting in Lusaka did not have access to the sessions where key results and lessons learned from the October joint border operation were discussed among enforcement officers; nor was he admitted to visit the working groups during their discussions on activities within the project so far and proposals concering the way forward.

Partial results data. None of the four components was completed before the evaluation took place. GAPIN was nearly finished, with the final report due in the first quarter of 2013. The Western Africa capacity-building activities had only started in Octo-

[4] The four projects included GAPIN and the three regional initiatives of the Columbus Project.

ber 2012, and Sida had approved in late 2012 a no-cost extension of assistance to end-2014. The Southern and Eastern Africa projects were due to finish at end-2012, but were extended for a year shortly after the field mission finished.

For the Sida **Columbus Project**, only two annual reports were available before the field mission: 31 July 2009/rev 30 April **2010;** and June **2011** (approved in early 2012). The annual report for July 2011-June 2012 was received on 22 November. No audit had been conducted since 2011. Plans for 2013 had not been completed before end-2012. Little official reporting (ie, quarterly or half-yearly reports) was available on achievements occurring after June 2012, apart from a good progress report presented at the SACU Steering Committee Meeting on 22 November.

For the **GAPIN Project**, the first phase was completed in March 2011 and a final report was issued. For Phase 2, two of the four key activities (transnational border operation, debriefing) took place in October and December, respectively, and the final report will be available in the first quarter of 2013.

<u>Lack of clear baselines, practical indicators and detailed results frameworks</u> inhibited the Team's ability to measure progress, and meant they had to depend to a large degree on anecdotal evidence from interviews and outside sources. Where possible, the Team attempted to secure partial baseline information from early assessments and proposals, WCO needs assessments, annual reports, the midterm review, other organisations' reports, surveys and statistics (eg, time-release studies), and interviews.

2 Sida Columbus Project: Brief Background

As explained under *Scope*, this report evaluates the Sida-supported Columbus Project from 2010, although it started in 2008. In order to appreciate how far it has come (in Southern and Eastern Africa) since 2008, we include below a brief summary of its origins as a subcomponent of the WCO's Columbus Programme.

Origins of the 'Umbrella' WCO Columbus Programme
Established in 1952, the World Customs Organization (WCO) is the intergovernmental body with global responsibility for setting and applying international standards for Customs. Its 179 members represent 98% of global trade. The WCO's mission is to *"…enhance the efficiency and effectiveness of Member Customs administrations, thereby assisting them to contribute successfully to national development goals, particularly in the areas of trade facilitation, revenue collection, community protection and national security."* (WCO 2008)[5]

Since 2006, the WCO has initiated numerous capacity-building programmes and activities. The WCO Columbus Programme, *Aid for SAFE Trade*, is the most significant. An open-ended, demand-driven programme, it aims for full implementation of the Framework of Standards to Secure and Facilitate Global Trade (SAFE). It also provides support on World Trade Organization (WTO) Trade Facilitation negotiations and implementation of WCO instruments such as the Revised Kyoto Convention (RKC), the legal basis for the simplification, harmonisation and standardisation of customs procedures.[6]

Role of Customs
"Customs authorities perform tasks related to revenue collection (via tariffs, fees, excise taxes, etc), national security, community protection, trade facilitation and trade data. Traditionally focused on collecting border tax revenue, Customs authorities now play an important role in facilitating trade, thus supporting economic growth and poverty reduction. In recent years, they have been given broader security, health and food safety responsibilities. Often the 'lead agency' at the border, Customs increasingly is charged with coordinating the border activities of police, immigration, food and plant

[5] WCO 2008
[6] WCO SAFE Framework of Standards, adopted in 2005, is a comprehensive instrument containing 17 standards to which Customs Administrations are expected to adhere. The 17 standards focus on four core elements: advanced electronic information; risk management; authority to inspect high-risk imports, exports, and goods in transit; and customs-business partnerships. SAFE also calls for integrity within Customs Administrations. The Revised KYOTO Convention, focusing on the simplification and harmonisation of Customs procedures, entered into force in 1974 and was revised and updated in 1999. It is the blueprint for modern and efficient Customs procedures. The Convention's key governing principles promote trade facilitation and effective controls through legal provisions for applying simple, efficient procedures. Implemented widely, it will provide international commerce with the predictability and efficiency that modern trading requires.

protection (sanitary and phytosanitary), health, environment and other agencies." (WCO)

The WCO Columbus Programme consists of three phases:

I. Needs assessment: diagnostic studies at the national level.
II. Implementation: preparation and adoption of comprehensive customs modernisation programmes, securing of political and financial support, and actual implementation, including pilot activities.
III. Monitoring and evaluation of progress, leading to updated needs assessments and a new support and implementation cycle (few countries have reached this stage).

The WCO has established partnerships with its member states, donors, international organisations, regional commissions and private sector bodies to deliver or facilitate these services. Sida has been one of its first and largest partners for assistance in Phase 2 activities.

2.1 BACKGROUND OF SIDA'S INVOLVEMENT

In 2008, Sida approved a five-year SEK45.2 million programme to support the World Customs Organization's capacity-building programmes in three regions of Africa. It was entitled "Capacity-Building Programme-Regional Implementation of the Columbus Programme Phase II in Sub-Saharan Africa", henceforth the 'Sida Columbus ***Project***'.

The objectives specified in the original 2008 Agreement between Sida and the WCO were as follows.

Objectives and Desired Results of Sida's Original Support:
The Sida Columbus Project: 2008-2012

Overall objective:. To contribute to a sustainable and improved economy in Africa with regard to trade, security and social protection through development of Customs authorities as fair and effective trade management partners as well as modern social protection and revenue collection services.

Specific objectives
To assist the Member Countries of three African economic regions: East African Community (EAC), Southern African Development Community (SADC) and Economic Community of West African States (ECOWAS) to:
1. meet their specific objectives towards the achievement of regional customs unions and for Ethiopia to integrate into the East African region; and
2. establish effective customs services and thence decrease trade barriers.

Desired Results: The 10 March 2008 pre-assessment conducted by Sida stated: '*The expected result of the proposed contribution is the delivery and accomplishment of established technical goals, and increased capacity in recipient Customs organisations to plan, programme and implement change-management projects.*' The logframe attached to the 2008 project proposal stated in the 'Outcome' column: '*Regional Customs services working to a common regional customs code which in key areas is compliant with the Revised Kyoto Convention, the SAFE Framework of Standards, and regional requirements*'.

Regional Objectives
1. **EAC** (Burundi, Kenya, Rwanda, Tanzania, Uganda)**:** To assist customs organisations in the EAC region to design and implement a comprehensive regional reform programme with a focus on:
   - Enhanced trade management

- Movement in line with the EAC desire for a Customs Union
- Introduction of a broader approach towards Border Management and Risk Management.

2. **SACU (**Botswana, Lesotho, Namibia, South Africa, Swaziland): To assist customs organisations in the Southern African Customs Union region to design and implement a comprehensive reform programme aiming at achieving the criteria for merger into the SADC region by 2014.

3. **ECOWAS**: To assist the customs organisations in the ECOWAS region to establish a Customs Computer Interconnectivity System through the harmonisation and integration of the ICT systems of the 15 countries of the region: Benin, Burkina Faso, Cabo Verde, Cote d'Ivoire, Gambia, Ghana, Guinea, Guinée Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, Togo.

4. **SADC:** To assist the customs organisations in Democratic Republic of Congo, Mozambique, Namibia, Zambia and Zimbabwe to meet the requirements of the SADC region of a coherent regional approach towards multilateral trade activities and negotiations.

5. **Middle East and North Africa (MENA)**: To assist the customs organisations in the MENA region to identify, develop and maintain cooperation with development partners.

6. To assist the customs organisations in Burkina Faso, Ethiopia, Nigeria, Morocco and Libya in the establishment and management of their customs reform programme with the aim to meet the requirements of the SAFE Framework of Standards.

Source: 2008 Project Agreement

2.2 MAJOR REVISIONS IN 2010

However, implementation of such a broad agenda proved too massive a task, and the Sida Columbus Project was significantly cut back in 2010. According to the first Annual Report, revised version April 2010: "*In discussion with Sida during annual follow-up meetings in September 2009 and January 2010, it was agreed that the following components should remain in the programme, and all other countries should be phased out:*

- *EAC Component*
- *SACU Component*
- *ECOWAS Component*
- *Ethiopia as a single customs administration*."

2.2.1 Midterm Review, September 2010

In 2010, Sida and the Norwegian Agency for Development Cooperation (Norad) commissioned a Midterm Review of the overall WCO Columbus Programme. On page 26, its conclusions on the Sida **Columbus Project** stated: "*In terms of immediate action, the main priority should be for Sida to continue its support to the regional programme (essentially EAC, SACU and Ethiopia). The WCO Secretariat is responsible for ensuring that reporting is produced as stipulated, but Sida also needs to show active interest. The EAC project is at a very exciting stage and, given continued progress, should be given sufficient support to allow for (properly documented) piloting and implementation phases. The two key issues as regards the EAC project are to coordinate with the EAC Secretariat and to get the pilot phase underway. The SACU project should be given time to prove itself, and the Ethiopia project seems to be progressing well. The ECOWAS project looks less promising; the other projects show that ownership is key to success, and if the ECOWAS Secretariat does not show strong commitment, the project should be abandoned or transformed in some suitable way*."

2.2.2 Modifications of scope

By **December 2010**, radical modifications were introduced, with a new set of specific objectives and a more complete results framework (see box below). While the overall approach to the EAC, SACU and Ethiopia components did not change, the focus was tightened and sequencing was improved. The ECOWAS component was totally redesigned to focus primarily on management issues.

Objectives of Revised Sida-funded Columbus Project, 2010-2012

Overall objective:. To contribute to a sustainable and improved economy in Africa with regard to trade, security and social protection through development of Customs authorities as fair and effective trade management partners as well as modern social protection and revenue collection services.

Specific objectives
To assist the Member Countries of the three African economic regions EAC, SADC and ECOWAS to:

1. meet their specific objectives towards the achievement of regional customs unions, and for Ethiopia to integrate into the East African region; and
2. establish effective customs services and thence decrease trade barriers.

Desired results: Overall, the same as in 2008 (see previous box). New logframes and activity plans for each component revealed a more comprehensive approach.

Regional Objectives

1. To assist the customs organisations in the **EAC** region to design and implement a comprehensive regional reform programme with a focus on:
   - enhanced trade management
   - progress in line with the EAC desire for a customs union
   - principals and practical application of risk management

   Desired outcome: an EAC trade facilitation framework fully operational by 2012.

2. To assist the customs organisations in the **SACU** region to design and implement a comprehensive reform programme aiming at achieving the criteria for merger into the SADC region by 2014. Desired outcome: a uniform set of SACU customs policies and procedures that will reduce costs for legitimate trade, maximise revenue collection, provide social protection, and generate accurate statistical information.

3. To assist customs organisations in the **ECOWAS** region to develop and enhance management skills and competence among top and middle customs managers so they are able to run and facilitate more advanced regional projects. Priorities:
   - strategic management
   - human resource management
   - implementation of WCO instruments and conventions
   - integrity and good governance
   - stakeholder relations
   - fundraising.

   The ECOWAS programme also features direct assistance to Liberia (the weakest customs administration in the region) through a multipartite agreement among Swedish Customs, Ghana, Liberia and the WCO for assistance to:
   - enhance capacity to manage seaport, airport, road border operations and procedures
   - build capacity to migrate tariffs to WCO HS nomenclature
   - strengthen capacity to develop Standard Operating Procedures for key operational areas
   - develop integrity.

4. To assist the Customs organisation in **Ethiopia** in the establishment and management of its customs reform programme with the aim of meeting the requirements of the SAFE Framework of Standards.

Source: 2010 Proposal

Regarding the **ECOWAS component**, the original 2008 project focused on the creation of a common platform for IT connectivity to facilitate customs information exchange and thus support regional customs integration. However, this initiative never took off, despite repeated efforts by the WCO and its Western Africa Regional Office for Capacity Building (ROCB-WCA). While several proposals were elaborated to relaunch the IT project, none came to fruition. The February 2012 ECOWAS Project Proposal listed the main reasons as:

- the lack of commitment of certain national customs administrations
- the loss of project champions due to turnover and lack of regional leadership
- an insufficient pre-project analytical and participatory process ("*The WCO recognises that shared IT infrastructure may have been seen as a threatening concept by some administrations and perhaps not the best choice as a first step towards regional integration*").

In 2010, the IT initiative was cancelled, and the WCO engaged a consultant to develop a new proposal. After a rather lengthy process, Sida approved a totally new project focusing on Customs-management capacity building and featuring the six priorities listed in the box above. These reflected the regional strategic priorities agreed by Western African Customs officials in 2009. With a budget of slightly more than €2m, the revised project was scheduled to start in January 2011. However, the WCO was only able to recruit a Regional Project Manager in December 2011.

2.3 PRIORITIES TIGHTENED IN 2011-2012

The specific objectives and priorities were further tightened in **2011-12**, as follows:

SACU	EAC	ECOWAS
1. Trade Partnerships (Preferred Trader)	1. AEO Programme[8]	1. Human resource management
2. IT Connectivity	2. Risk management	2. Stakeholder relations
3. Risk Management	3. Post-clearance audit systems	3. Resource Mobilisation

2.3.1 SACU and EAC

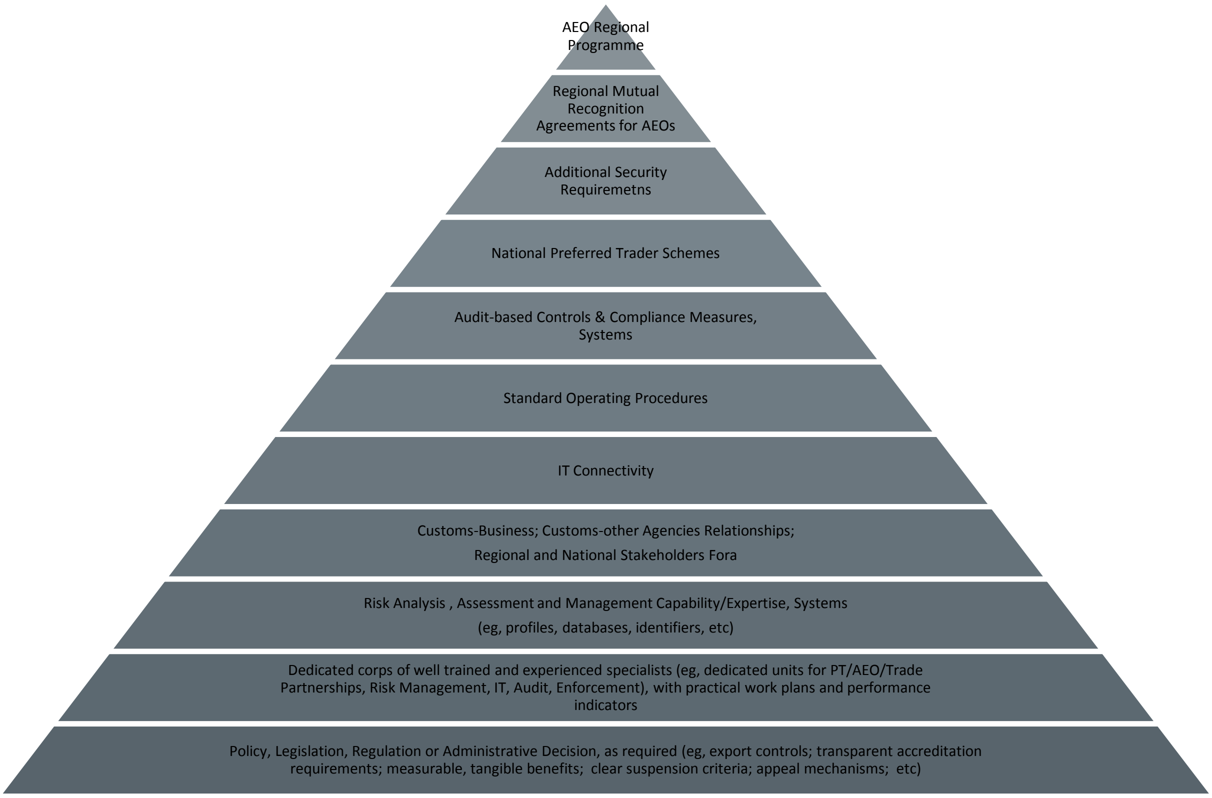
Both the SACU and EAC projects are now focusing on developing the same sets of capabilities that will allow them to comply with the Revised Kyoto Convention and eventually implement regional Authorised Economic Operator programmes. (The AEO concept is part of a broader SAFE and RKC compliance strategy to reward compliant traders with benefits that simplify and facilitate trade.)

These building blocks are illustrated in the pyramid below (illustrating the theory of change described in Section 4). The SACU region is currently building up to Preferred Trader schemes, while the EAC is working towards a regional AEO programme.

While the EAC region was more advanced in customs modernisation and trade partnerships (Customs-Business relations) in 2010, the SACU region is quickly catching up thanks to Sida's Columbus Project (and delayed EAC AEO implementation). In both regions, some countries are more advanced than others. South Africa, for example, has many of the building blocks in place up to Preferred Trader (with more than 170 PTs) and is consolidating its skills and capacity in these areas (and helping its neighbours). Other SACU countries are at varying levels of competence in each building block, and require considerable assistance in risk management, audit and IT connectivity. Lesotho, for example, still operates manual systems, though it is moving to automated systems soon.

In the EAC, a similar situation exists. Kenya has an AEO scheme in place (though it is not yet full-fledged) and Uganda has started the application process. All EAC countries need to fortify capacity and skills in risk management, audit and IT connectivity. And all the SACU and EAC Customs administrations need to strengthen analysis, human resource management and stakeholder relations.

Building Blocks of Preferred Trader and Authorised Economic Operator Programmes



Source: Author, from information supplied by the WCO

2.3.2 ECOWAS

The ECOWAS project finally commenced in February 2012 when the new Regional Project Manager (RPM) started work in Brussels. His February 2012 Project Proposal featured a further tightening of the scope to:

1. Human resources management: strengthen recruitment, HR planning and development, workplace environment, etc, to enhance recognition of the central role of human resources in a Customs organisation
2. Stakeholder relations: strengthen organisational capacity to establish and maintain strong strategic alliances, including through formal consultation mechanisms at the strategic and operational levels
3. Resource mobilisation: strengthen Customs capacity to secure support and funding for modernisation initiatives by clearly and concisely articulating re-

source needs and demonstrating value for money. Topics included costing methodologies, performance indicators, and internal and external advocacy for reform.

The project's stated goal was to "*strengthen the administrations so they are more capable to eventually implement WCO instruments*".

A later document – the May 2012 Work Plan – described the overall objective as: "*To strengthen the management of customs administrations in the region in order to promote and facilitate regional integration and ensure modern customs operations, thus contributing to the development of an open, rule-based, predictable, nondiscriminatory trading and financial system".*

The approach was to be two-pronged and implemented over three years (2012-2014):

1. regional: six workshops in 2012-13 (one each in English and French for the three themes) to address common needs and priorities through established good practices and modern management techniques. These would act as a springboard for the subsequent demand-driven national-assistance phase.
2. national: intensive tailored assistance at the national level, designed and facilitated by the WCO upon receipt of requests from eligible customs administrations.

The ECOWAS project also featured direct assistance to Liberia (the weakest customs administration in the region) through a multipartite agreement among Swedish Customs, Ghana, Liberia and the WCO to:

- enhance capacity to manage seaport, airport, road border operations/procedures
- build capacity to migrate tariffs to WCO 2007 HS nomenclature
- strengthen capacity to develop Standard Operating Procedures for key areas
- develop integrity.

2.4 PROJECTS EXTENDED IN 2012

SACU and EAC components extended to December 2013

The Annual Report for July 2011-June 2012 was issued to Sida on 21 November, just in time for the annual Sida-WCO Review Meeting in Gaborone on 23 November. Based on that report and meeting, and on preliminary feedback from the field, Sida approved the WCO's requests to "*retain the unspent amount of €1 060 281 for use in programme implementation during the extension until December 2013*" and to disburse SEK5.2m as the final tranche.

ECOWAS extended to December 2014

Earlier in November Sida had approved a no-cost extension to end-2014 for the ECOWAS component.

According to the accounts to June 2012, approximately €2m of Sida funds had been expended since 2008 on its Columbus Project, out of disbursements of just over €3m.

3 Columbus Project: Relevance, Harmonisation and Ownership

3.1 RELEVANCE AND ALIGNMENT OF OBJECTIVES AND PRIORITIES

3.1.1 Objectives

The Sida-funded **Columbus Project** focuses on customs modernisation and trade facilitation in 25 countries in Eastern, Southern and Western Africa Economic Communities. The **desired outcomes** of the three components, as stated in the original 2008 assessment and proposal (and still valid),were:

1. *Regional Customs services working to a common regional customs code, which in key areas is compliant with the Revised Kyoto Convention, the SAFE Framework of Standards, and regional requirements.*
2. *Increased capacity in Customs organisations to plan, programme and implement change-management projects.*

Specific objectives set during the re-engineering of the project in 2010-11 were:

- *An EAC trade facilitation framework fully operational by* 2012
- *A uniform set of SACU customs policies and procedures that will reduce costs for legitimate trade, maximise revenue collection, provide social protection, and generate accurate statistical information*
- *Enhanced management skills and competence among top and middle ECOWAS region customs managers, so they are able to run and facilitate more advanced regional projects*.

Specific priorities were as set out in 2.3 above.

Guiding Principles for the SACU WCO/Sida Project

In October 2010, SACU Heads of Customs agreed the following guiding principles for implementation of the SACU-WCO Customs Development Programme:

- limit the number of priorities to ensure sufficient progress
- enhance focus on delivery (things that make a real and measurable difference on the ground)
- reduce the need for meetings and instead utilise practical working groups
- increase visits to border posts to ensure a hands-on approach
- increase implementation and monitoring capacity
- take practical steps to enhance coordination of customs activities around the region
- member states to provide leadership in ensuring coordination of donor activities
- learn from best practice and leverage experiences of others (workshop participants to share skills)
- acknowledge the capacities available in member states
- enhance ownership
- target ‘quick wins’ and results to encourage greater commitment.

Source: Steering Committee Meeting Report, October 2010

3.1.2 Relevance and Alignment

The umbrella WCO Columbus Programme is highly relevant to and aligned with international and regional objectives and priorities. The objectives of assisting Customs administrations to meet the requirements of the SAFE Framework and the Revised Kyoto Convention are anchored in international conventions adopted by all the countries involved in the Sida-WCO Projects. In addition, most of these countries are involved in the WTO Trade Facilitation negotiations which aim to clarify and improve the General Agreement on Tariffs and Trade Article V (Freedom of Transit), Article VIII (Fees and Formalities connected with Importation and Exportation), and Article X (Publication and Administration of Trade Regulations). The negotiations also aim to enhance capacity building and improve cooperation between customs and other authorities on trade facilitation and customs compliance issues.

The Sida Columbus Project's *specific* objectives are now aligned with regional priorities and address needs identified in Diagnostic studies and regional fora. This contrasts with the situation in 2008-2010, where Customs officers questioned the alignment – though not the relevance - mainly because a common understanding of regional and national Customs priorities did not exist then. Through Steering Committees, regional policy frameworks and joint operations, common understanding has improved.

Sweden's Priorities for Development Cooperation in Sub-Saharan Africa

The current strategy for Swedish regional development cooperation with Africa South of Sahara (2010-2015) was adopted by the Government in October 2010. The overall objective is to increase capacity and political mutual understanding among the countries and communities of Africa to deal with crossborder challenges in areas such as stability, trade, economic intregration and sustainable development. The perspectives of the poor and of human rights shall form the point of departure, and cooperation shall focus on building regional actors' capacity in areas where a regional support is expected to be more effective than single bilateral contributions. Swedish support shall be directed towards the African Union (AU) and Regional Economic or similar Communities, or to national or regional actors supporting them, with a particular emphasis on the fight against corruption. Moreover, the participation of women and democratic governance are parts of the overall objectives for Swedish development cooperation. Nevertheless, the support shall reflect the needs and priorities of the member countries. The following areas are prioritised: peace and security, enviroment and climate, and economic integration including trade, industry and financial systems.

Source: Samarbetsstrategi för det regionala utvecklingssamarbetet med Afrika söder om Sahara 2010-2015

Moreover, the Sida Project filled gaps in donor programmes, national Customs systems and regional frameworks. "*The Columbus Project filled gaps in systems, procedures, structure, organisation, skills. It provided a systematic approach to skills-building, organisational development, systems analysis, etc. The Time-Release Study (TKC Secretatriat helped) identified bottlenecks, and gave us some baselines and a focus for action.*" (National Project Manager, Namibia)

Interviews indicated that Customs-to-Customs relations have improved considerably because the Sida Columbus Project has provided a framework and, since late 2010, coherent action plans such as Steering Committees, regional and national action plans, National Project Manager activities, joint operations, etc.

That said, there is room for improvement, according to Steering Committee members in both the SACU and EAC regions.

"*There was misalignment (between objectives and capabilities) in the first years, and we are still moving at the pace of the slowest. We need to address this issue in terms of allowing the more advanced countries to move ahead and provide a model and path for the less advanced ones to follow. We can use the Corridor approach to facilitate and accelerate regional alignment (SACU, SADC, Tripartite, TKC). And we must get the RECs to harmonise and not reinvent the wheel. The same goes for donor projects*." South Africa Revenue Service (SARS) Nov. 2012)

"*There is still a need to synchronise regional and national plans, objectives and approaches. There is a clear role for the RECs in this." (Namibia Director of Customs)*

"*Alignment of Sida's Columbus Project with trade negotiations (WTO, EU, etc) and other Customs work is critical, to harmonise efforts and objectives and achieve cooperation among agencies and regional partners."* (SACU Secretariat)

3.2 OWNERSHIP AND STAKEHOLDER RELATIONS

These two interrelated issues remain a BIG challenge – as they have from the beginning. The success of the Project and the sustainability of its results depend on strong ownership and stakeholder support.

Have all the right stakeholders been involved in initial needs assessments, project design and implementation activities? Customs/Revenue Authorites have been closely involved in the original WCO diagnostics carried out under Phase 1 of its umbrella WCO Columbus Programme, as well as in the subsequent design and implementation. Among regional economic organisations, the SACU Secretariat has been the most involved, hosting the Project, providing support for implementation, etc. Two people from the ECOWAS Secretariat are on the new (2012) West African Customs Administration Modernisation (WACAM) Steering Committee. While the EAC Secretariat was reluctant to host the Project, it has nevertheless cooperated through representation at EAC project and SC meetings and through adoption of Project policy recommendations as regional legislation. However, according to several sources, efforts to involve the Customs Directorate more actively have encountered a non-response. With a few exceptions (eg, the United States Agency for International Development (USAID) in SACU, East Africa Business Council in EAC), the private sector and other donors have not been involved as active 'partners' in the Projects' original needs assessments, design or implementation; various stakeholders indicated that this was a major shortcoming that needed to be addressed.

Lessons Learned??
"Feedback obtained by WCO Member administrations during the diagnostic mission indicates that many capacity-building programme have failed to adequately address the need to obtain the full participation and commitment of Customs officials. As a result, many Customs personnel have had little commitment to the organisational and administrative reforms. WCO methodology will be to encourage the regional/national ownership, to strengthen the dialogue with the beneficiary Customs administrations, business representatives, representative from other donor institutions and political leadership."
Source: WCO original 2008 and revised 2010 Project Proposals, Section 9.4

Have awareness-building efforts been successful in terms of building strong constituencies for change? Momentum is growing, but more awareness-building and confidence-building are required.

Is local and regional ownership and support high? In SACU region, Customs issues, have been placed on the Heads of State agenda as a result of the Project. Finance Ministers receive regular reports, at their request. In the EAC, the AEO programme is on the Ministerial Meeting agenda. Support is high among Customs Directors and the officers directly involved in implementing the programme (e.g., risk management unit staff). However, above and below the Directors, resistance still exists, due to lack of understanding, lack of involvement and a fear of change. Frontline border officers are supportive where they are involved in the pilots or operations. However, these things involve only a few posts. In addition, the business community is only partially aware of the programme and how it fits into the wider trade facilitation agenda. The 'stakeholder fora' mentioned in the annual reports did not seem to have much impact. Much more work is required in 2013 on communications and stakeholder relations, including strategies for each target group (Ministers, Commissioners-General and their staffs, Deputy Directors of Customs, general Customs staff, border station managers and officers, traders, business groups).

How do various international organisations and donors cooperate in providing assistance to Customs authorities? Cooperation is largely superficial. A common message from those interviewed was that donor coordination required priority attention. See 2.4 below.

3.2.1 Resistance to change

While ownership of the Sida Columbus Project is generally strong in the region, 'buy-in' at key levels needs attention. Virtually all people interviewed said that securing broader 'buy-in' of customs modernisation and trade facilitation was an urgent priority. Many Customs Directors and officers directly involved in the Project said that one of their main challenges is resistance to change. Such resistance varied from country to country, but typically it involved politicians, deputy directors of Customs, middle managers and border officers. This was attributed, among other reasons, to poor understanding of the customs modernisation agenda, and lack of involvement in designing and implementing the reforms. As mentioned before, resistance to change is common in major reform programmes. Those interviewed believed the Project – and the RECs - could do more to enhance understanding, be more inclusive and communicate the benefits .

A Rwanda Customs officer described the challenges of taking the 'mission' mentioned above to reality. *"Wherever there is change, there is risk of resistance. All change has to be justified and requires considerable amounts of funds and effort. The most important aspect while undertaking any kind of reform is political will and support right from the top, especially from the Ministry of Finance and management. Once we were guaranteed those, progress was evident. Availability, involvement and motivation of staff and internal experts are equally essential. Experience is the best teacher ever - to learn from best practices and to benchmark; this is the beginning of success. Any reform should be implemented in a phased approach for consistency and steadiness. It is a process that requires a step-by-step approach and strong determination, as in most cases change is resisted. The facilitation measures we implemented removed unnecessary delays in clearance processes from point of entry to final destination. Further, they changed Customs' traditional mindset of judging traders as* *smugglers and initiated a coexistence environment." (*Zephania Muhigi, Head of Customs Field Operations Division, Rwanda Revenue Authority, presentation, Oct. 2011)

According to the Director of the Trans-Kalahari Corridor Secretariat, who works closely with the SACU Secretariat, including on the Columbus Project, "*The biggest challenge is 'buy-in'. Officers attending workshops do not have authority to take decisions. SACU Secretariat Executive Management needs to prioritise budget for these activities. Customs Directors need the mandate and support to drive change within their own administrations, where they have an uphill battle. Although it is a regional approach, issues of sovereignty and national priorities prevail*."

The June 2011 SACU IT Workshop Report suggested that SACU Secretariat take measures to involve Commissioners-General of Customs, to enhance commitment to reforms. "*Swaziland noted challenges with implementation of most of the initiatives is that Commissioners-General are not part of the SACU structures. National consultations which need high-level support often are not well supported and are difficult to pursue. Swaziland requested the Secretariat to consider making necessary institutional changes*." This topic was also raised at the June 2011 Steering Committee meeting in Brussels. It was further discussed in the closed session at the Fifth Steering Committee meeting on 7 October 2011 in Johannesburg.

Numerous interviewees said that senior decision-making and political levels need to be fully engaged in order to implement what has been agreed in a timely fashion (e.g., regional and national action plans and follow-up to practical workshops). Mr Mahlinza, Director, Revenue Management and Trade Facilitation at the SACU Secretariat, confirmed that the organisation is considering a *SACU Forum for Revenue Authorities* that would involve Commissioners-General more directly in the regional trade facilitation and customs reform agenda.

A key message from the field was that stakeholder relations need to be addressed in a proactive, targeted and cohesive, regionally and nationally. This includes Customs-Business and Customs-Other Agencies relationships in particular. Business groups in both regions said relations with Customs had improved in recent years, but that much more effort was needed *from both sides* in order to address the increasingly sophisticated and complex issues they are facing in international trade.

The TKC suggested a Customs-Business Forum in each Member State with working groups on specific issues (eg, working hours at border posts). The Director of a SACU Logistics Association said a 'peak' Regional Customs-to-Business Forum would be the most beneficial because it would have a clear mandate, division of labour, private sector representation, and seek practical outcomes. He worried that national Customs-Business fora would duplicate National Trade Facilitation Committee efforts and membership, and exacerbate territorial issues between Trade and Customs agencies.

Lessons learned:

- Effective cooperation requires much more than exchange of information. It requires systems, networks, constant effort, tangible results, good communications, and a sense of common purpose.
- Effective, targeted communications and relationship strategies are essential.

3.3 HARMONISATION WITH OTHER PROJECTS

Numerous bilateral donors and international organisations are involved in trade facilitation and customs modernisation in sub-Saharan Africa. These include the EU and several of its Member States, the US, Japan, various UN agencies, the World Bank, the International Monetary Fund (IMF), regional development banks and other bodies. Sida has also funded other projects related to trade facilitation, such as the wellness centres along transport corridors (to combat HIV) and activities of TradeMark Southern and Eastern Africa (a mainly DfID-funded programme).

The WCO is considered a valuable partner. "*The WCO's advantage is that it is seen as a neutral, member-driven organisation, representing members' interests and helping them to apply WCO instruments and meet obligations of WCO conventions. Its experts, as peers, are highly regarded and respected by African Customs services. And the WCO-supported Regional Intelligence Liaison Office (RILO), ROCB and RTC add value on a regional basis.*" (Kenya Customs)

The technical assistance programmes require competent staff and stable financing. A Trust Fund arrangement is one option being considered. The WCO could analyse the experience of other TA trust funds, since there are many lessons to be learned.

3.3.1 Donor Coordination

As noted above, many people interviewed (from Customs and the private sector) highlighted donor coordination as a top-priority issue. "*There is too much fragmentation – each donor wants to run with its own programme and take the credit. Countries find it hard to say no.*" (Trans-Kalahari Corridor Secretariat)

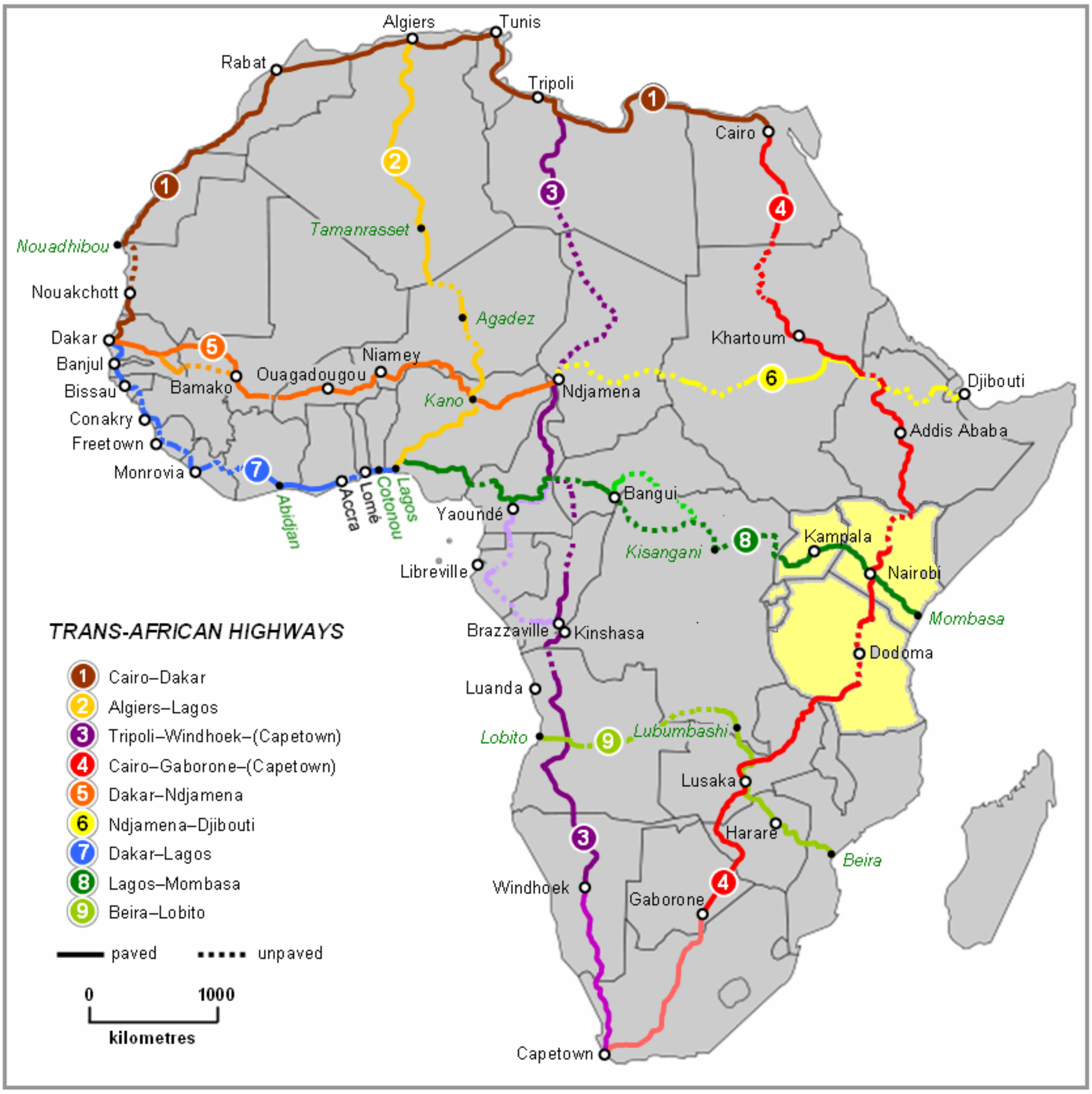
Recently the WCO has taken steps to improve harmonisation of its activities with other donor projects. It has asked donors to voluntarily list their Customs-related projects on its 'Project Map' webpage, accessible only to Members. In Africa, the WCO initiated a donor coordination meeting in Mauritius in March 2012. Like most donor coordination efforts, this led to useful exchanges of information. However, a stronger effort would be required to achieve the 'aid effectiveness' goals of harmonised or joint planning, programming and implementation.

The close collaboration of the SACU Secretariat with the Trans-Kalahari Corridor Secretariat is an result of a SCM decision. It was designed to build on the Single Administrative Document and AEO work initiated by the TKC under the SADC umbrella (with EU funding).

On another positive note, a number of lightly coordinated donor initiatives – mostly complementing each other - are expected to come to fruition in the SACU and EAC regions in 2013. According to the Director of the Trans-Kalahari Corridor Secretariat, all these efforts together have the potential to translate the ESA region into real economic development corridors.

For example, along with the SACU Preferred Trader and the EAC AEO pilots, there are activities (and pilots) for Single Window (TradeMark), one-stop border posts

(JICA), and IT connectivity (US Trade Hub, South Africa, UNCTAD). In addition, Finland is assisting (via WCO-ESA) on leadership, management and coordinated border management. Germany's GIZ has been offering leadership support. The Development Bank of Southern Africa and the African Development Bank have been working with Corridors on truck stops. And the WTO has been working on Trade Facilitation. In Sept. 2012, all the corridor management bodies in Africa met in Addis Ababa to establish a forum platform to share challenges, good practices, advocacy and a coherent approach to donors. United Nations Commission for Africa (UNECA) is facilitating this joint platform and a Secretariat is to be established in Addis Ababa soon.



Source of map: EAC Secretariat presentation: *Accelerating Implementation of Trade and Transport Facilitation Instruments in Afric*a, Slide 23. (No date on document.)

4 Sida Columbus Project: Quality and Coherence of Design

4.1 RELEVANCE AND ACCURACY OF THE 'THEORY OF CHANGE'

The Sida Columbus Project's customs reform objectives are contingent on changes in mindset and behaviour in the main target groups: Customs, other relevant agencies, traders, government decision-makers and regional economic commissions. The theory of change was based on expectations that individual and institutional capacity development would eventually produce the desired changes and results.

4.1.1 Assumptions

The assumptions underpinning the original *and revised* desired results and timing overestimated both the readiness of the three regions to undertake far-reaching reforms, and the management capability of the WCO Capacity-Building Directorate. The assumptions perhaps reflected the WCO's inexperience in managing such projects - e.g., in assuming political, social and organisational stability; that the 'highest levels' were already committed to reform, that institutional incentives to change were sufficient, that appointments would be based purely on merit, that the right people would attend workshops, and that legislative processes would be timely.

WCO Assumptions Underpinning the Sida Columbus Project's Desired Results

Ownership and support at all levels (stakeholder and staff) are crucial for the Customs reform process. The project is designed to be implemented upon the assumption that the following conditions will be guaranteed:

- Political and social stability
- A fully functioning civil service which provides the basic infrastructure necessary to administer national laws and international commitments
- The highest political and administrative levels of the beneficiary authorities remain committed to continue sustainable Customs reform
- Adequate long-term resourcing and access to sustainable funding
- Customs Services are willing to participate in making their service delivery mechanisms more effective, professional and transparent
- Customs' top management committed to implement changes recommended by the project
- Organisational stability within Customs
- Appointment of Customs officers are based purely on merit
- The necessary national counterpart staff is available to attend the training and discussions with the WCO experts
- National staff will be made available to lead the regional programme and project development and attend appropriate training and discussions with advisers for the duration of the programme
- WCO experts and consultants have full access to all necessary documents and information
- Key working documents and legislative reviews are available on time.

WCO will ensure frequent risk assessment and monitoring through reporting towards the Steering Committee. In case of occurrence of any risk identified, the Steering Committee will decide on countermeasures to mitigate it and report WCO and Sida."

Source:WCO 2008 and 2010 Project Proposals, Section 9.8: Risk Assessment

In terms of identifying the main risks for the Sida Project, the assumptions were largely correct – and a number of them are indeed posing risks for the Project's effectiveness and efficiency. Regarding the last paragraph in the box above, the Reviewers saw no evidence of 'frequent risk assessment' nor of *detailed* risk-management action plans in SACU and EAC reports. At Sida's request, a well designed ECOWAS Risk Management Plan was produced in February 2012 and will be updated in February 2013. All risk assessments would benefit from forward thinking on 'what to do if…'. The ECOWAS plan does this to an extent, but more concrete 'Plan Bs' may be required where high risk exists.

4.2.2 Unclear path to change

The Project's theory of change was not well thought through initially, and therefore proved to be inadequate. The concept papers (Project Proposals) discussed the types of capacity-building activities that would be needed. However, they provided no clear path that would take the countries to the desired result of compliance with the RKC and the SAFE Framework. No milestones were set, apart from vaguely defined AEO pilots. No benchmarks, baselines or appropriate performance indicators were built in to guide and monitor progress.

Little thought appears to have gone to the broader context (apart from the list of assumptions) in terms of how to proactively secure and sustain the conditions that would facilitate the necessary changes and advances (the project's sphere of influence). Objectives and capacity to absorb and deliver were not aligned. Crucial aspects of change management, such as communications, advocacy and donor coordination, were mentioned, but never implemented in a strategic fashion. As a result, the challenges (especially regarding ownership and political will), the amount of groundwork (e.g., legislative and other official processes) and the organisational effort required to take the Project forward were severely underestimated, leading to major delays in implementation, large amounts of unspent funds, and successive downsizing.

4.2.3 Clearer path helps sustain changing mindsets and behaviour

Both Sida and the WCO learned enough in the first two years to totally reconfigure the Project in 2010. Further tightening in 2011 led to more logical sequencing of activities focusing on more manageable goals in risk management, audit, IT connectivity and trader partnerships (preferred trader/AEO initiatives). This links to the pyramid in Section 2.3 which illustrates the path and theory of change more clearly.

Logical sequence for AEO/PT: Goal setting→regional policies→development of functional capabilities/expertise→standard operating procedures→pilots→apply lessons learned→refine laws→implement regionally.

Customs officers and Project Managers commented, "*We started advancing when we focused on baby steps, progressively building understanding and doing practical hands-on things that we could apply immediately*" (several Customs Directors and NPMs expressed this view in interviews).

Despite the weaknesses mentioned above, capacity building and encouragement of champions in Customs have delivered some laudable changes. Interviews indicated that important changes have been occurring, boding well for the Project – *if* they continue to be nurtured proactively in 2013 and beyond. The following quotes sum up views of stakeholders inside and outside of Customs authorities.

The Director of the South African Freight Forwarders Association said:
"We have noticed a marked change in Customs over the past 3-5 years in terms of:

- *new and improved processes, including a comprehensive approach to electronic releases*
- *customs modernisation*
- *alignment to the AEO programme via the Preferred Trader Programme*
- *increased outreach to business.*

New legislation in the form of the Customs Bills is now pending. We see the invitation to business to participate in the shaping of the final Bills as a significant step towards a stronger Customs-Business partnership. This took place approximately three years ago and was the key indicator of change in this regard."

The Rwanda Revenue Authority's Director of Customs said the Sida Columbus Project had provided valuable support in their efforts to implement a modern Customs strategy of both increasing revenues and facilitating trade. Their objectives align with those of the Sida Columbus Project.

Rwanda Revenue Authority's Trade Facilitation Objectives

Customs and Excise Department's Mission
To contribute to the achievement of RRA's objectives by maximising the collection of all revenues due on imports at minimum cost and to facilitate trade through providing a responsive and efficient service to stakeholders.

Strategic Objective
The Customs Department's strategic objective is to ensure that all legally chargeable revenues are paid through effective administration of the relevant laws. We will facilitate both international and national trade such that local and foreign investment is maximised while ensuring that society is protected from the importation of hazardous material.

Source: RRA website

To sum up, the Project is slowly but steadily contributing to change through education and individual and institutional capacity development. To add impetus and sustainability to these gains, a more proactive approach to risk assessment and risk management is necessary.

The following elements would improve the quality and coherence of the design and facilitate implementation:

1. in-depth analysis on costs and benefits of customs modernisation (tailored to each country, and showing how trade facilitation can actually increase their revenues) to underpin the institutional incentive to reform
2. benchmarks (e.g., for effective Risk Management Units, or Customs-Business Fora)
3. baseline data, so that Customs can aim for and demonstrate tangible results. Customs Directors stated that this, more than anything else, would encourage 'buy in' and commitment – the Project's main risk factors at present.

5 Sida Columbus Project: Management and Operational Efficiency

5.1 FINANCIAL PLANNING AND MANAGEMENT

Planning

The Sida Columbus Project financial planning, budgeting, monitoring and reporting have a lot of room for improvement. Project plans have consistently budgeted more than needed, due to overestimation of costs and ability to absorb, underestimation of timeframes necessary to achieve objectives, and errors in calculation. The large amounts of unspent funds are now being used for the project extensions in 2013 and 2014. The regional plans for 2013, submitted at short notice in late 2012 when the extension was announced, consisted of lists of activities and tentative costs, but no detailed budgets. These were to be provided in early 2013.

In financial planning for 2013, it will be important to bear in mind the relative priorities between the ECOWAS and EAC/SACU components – especially the effort that will be required to ensure the PT/AEO pilots' success (and thus the credibility of the whole project in SACU and EAC). The table in Section 6.2 of the Draft Annual Report to Sida did not appear to reflect these priorities, but at the time they were prepared, the WCO was only expecting a 6-month extension to June, not a one-year extension to December 2013.

Controls

Financial controls were too weak until early 2012 when, under pressure from Sida, the WCO took unprecedented action to deal with financial management at the EAC Project Management Office, following an audit report noting that large sums were unaccounted for or placed in inappropriate bank accounts. No major irregularities were uncovered, but this experience highlighted the need for much stricter WCO supervision, monitoring and control of Project Offices. (The SACU Project operates under a different system, with the Secretariat accountant managing all Project monies and reporting to the WCO.)

Auditors have highlighted various areas for improvement which the WCO has addressed – though it should have dealt with some of them much earlier (e.g., the Kampala regional project office's bookkeeping problems spanned several years).

The WCO ECOWAS RPM told the Review Team he had developed a thorough financial monitoring system and was working closely with the WCO financial section on a system that would show itemised costs under each component. He expected this system to be ready by end-March for the ECOWAS component.

Disbursement

Disbursement of funds by Sida has been timely (though one might question whether the funds have been released too early in view of the slow implementation). Disbursement of funds by the WCO to the Projects has been correct, according to the audit reports.

5.2 REPORTING

Managing expectations has been a challenge. The minutes of annual meetings show that Sida repeatedly requested the WCO to meet deadlines, to compare progress to plans, and to provide detailed forward planning documents. The WCO for its part, has encouraged Sida to clarify its requirements and provide templates. While some progress has been made, the November 2012 Annual Report showed that additional effort is still required. For example, while it provided expenditures against initial budgets and commented on the discrepencies, the report did not compare progress to plans in terms of activities delivered and milestones met. It was clear that different parts were written by different people. The financial report for the year to end-June 2012 included expenditures from previous periods. The auditor's report attached was for the 2010-11 period, not for the accounts to June 2012.

According to the Chief Financial Officer, the WCO is now developing a more comprehensive approach to financial planning and reporting for donor projects. The WCO and Sida may find the financial recommendations in Section 8.1 of use.

5.3 TIMELINESS OF REGIONAL ACTIVITIES

All three projects have faced implementation challenges.

The ECOWAS regional project got underway in 2012, after a complete refocusing in 2010 and a further year's delay in start-up. The Regional Project Manager started work in February 2012, and the first two of three sets of workshops took place in the second half of the year. The vitally important Human Resources component was postponed to 2013, even though the February Proposal stated that it was the one area where 'significant amounts of materials' were already available.

In the SACU and the EAC regions, considerable time and effort has been spent on securing regionwide agreement and policy frameworks on customs reforms. National legislation and implementing rules and procedures are still being processed. Since late 2010, the Project has focused on more achievable priorities, and is systematically building the capacity to achieve them. This has taken longer than expected, and the pilots have been delayed more than once, causing varying levels of frustration among traders and Customs officers. The larger, more advanced Customs Services (e.g., South Africa and Kenya) expressed some impatience; some officers suggested a two-track approach might produce more progress and thus improve 'buy-in'.

In the EAC, recurrent delays in implementing the AEO pilot have caused palpable discontent among both Customs and traders. The EAC programme has been underway since 2008, and the pilot was supposed to be underway by 2011, and then by early 2012. There were three main reasons given for the delays:

1. The region simply was not ready for a regional AEO pilot, as the building blocks were not in place. Customs found they could not implement an AEO programme without the underpinning capabilities to manage risk, audit and

IT. National Project Managers said the delays gave Customs services the time to improve their capacity, choose the benefits, develop SOPs, select pilot sites, brief border officers, and select pilot traders that all members could agree on (a difficult task, they discovered).

2. The EAC project has not been managed as well as it could have been. The above delays were exacerbated in early 2012 by the PMO audit and the RPM's attendance at several WCO overseas events.
3. Tensions between the EAC PMO and the EAC Secretariat were said to be 'unhelpful'.

In the SACU region the Preferred Trader pilot has been delayed for some months. One of the reasons is that some members are still in the process of implementing the necessary reforms (legal bases). Another, according to certain Customs Directors, is that the SACU Secretariat has not been proactive enough in seeking harmonisation of national laws and procedures with regional frameworks. A third is that capacity development is still underway. A fourth is that support from high levels is still needed. As one of the expert advisers noted: "*For progress to be worthwhile and assistance to be meaningful, senior members of Customs organisations must take a positive approach in implementing the action plans; otherwise, officers will not be able to apply in a timely fashion the knowledge and skills acquired in workshops and operations*". Several NPMs echoed this view, referring to levels above and below Customs Directors (e.g., Ministers, Commissioners-General, Deputy Commissioners, etc.).

5.4 COST EFFICIENCY AND EFFECTIVENESS

Brief Assessment of Sida Columbus Project Financial Reports to June 2012
Four financial reports have been submitted to Sida as part of the annual reports: April-Dec 2008, Jan-Dec 2009, January 2010-June 2011, and July 2011-June 2012. All four financial reports were audited. The Review Team did not receive a copy of the audit report for 2012 - or for 2008, written by GESCOFI. The 2009 and 2010/2011 audit reports were audited by F.A. Wilmet & Cie. In the opinion of the auditors, the financial reports give a true and fair picture of the financial position, costs and revenues associated with the Sida Columbus Project. A few details are further discussed in separate Management Letters for 2009 and 2010/11. Action on the issues raised in the December 2011 Audit Report, Management Letter and Management Response was spelled out in a chart on Mitigating Action (improving financial management and reporting at the EAC Project Management Office).

The audited reports include a list of costs per type of activity in each region, and the list has been signed by the financial officer. Other financial reports, annexed to the annual reports, show a more detailed breakdown of these costs, and these have been summarised in the enclosed tables[7]. However, the figures in the audited financial

[7] WCO has also sent very detailed accounting lists, but these have not been analysed since it was diffi-

statements do not coincide with the more detailed breakdown reports, which, moreover, do not include financial revenue or grant disbursements from Sida (and therefore do not show the fund balance). For 2009 the difference is €46,162, of which the largest amount relates to the costs for the Regional Programme Manager in East Africa. For 2010, the annex reports a difference of €24,992:53 between cash balance and reported expenditure, which is also reported by the auditors. The same difference between the balances, €46,162, is maintained in the 2011/2012 report, but the audit report was not available for comparison. The detailed breakdowns have not been accumulated in the reports, so in the enclosed tables the total costs for **2008-June 2012** have been added up from the four detailed reports.

The review team was instructed to use the project document dated November 2010 as a basis. The total budget for the programme in Annex B of that paper (around €4,785,000) was broken down mainly according to types of costs, such as fees, travel expenditure, etc. By contrast, the financial reports have been broken down by activities, so there is no easy way to compare budget with use of funds to date[8].

The structure of the detailed breakdown reports was not identical in the four annual reports. Whereas the reports for 2008 and 2009 had a common structure for the acitivities, the 2010/11 and 2011/2012 reports used a somewhat different description. The breakdown in the tables in Annex E of this Review may therefore be debated as to the number of workshops, steering committee meetings, preparatory meetings and other activities. This affects the calculated cost per workshop or meeting, whereas the total cost per region is more reliable.

Generally, it appears that Steering Committee meetings and workshops are more costly in East Africa than in the SACU region (the number of countries participating is the same: five each).[9] These reported costs relate only to travel expenses, accomodation and activities. The SACU RPM said they try to hold activities in Johannesburg as often as possible in order to save money on airfares; it is a hub for the region; so it is cheaper for people to congregate there. That has kept down costs. Also, WCO experts do not receive a fee, since they are lent free of charge by their respective Customs services. It would have been possible, but difficult, to include total costs for each event; such information may not have added much to an evaluation of cost efficiency or cost-benefit. This is mainly because the benefits of these meetings are difficult to value in quantifiable terms. Steering Committee meetings, for example, not only generate decisions but also stimulate cooperation, consensus and attitude changes. Instead of meeting physically it may have been possible to hold video conferences or Skype calls, at considerably lower cost. However, the benefits of interpersonal contact, networking, etc, would have been significantly reduced.

cult to compare them with the activity lists.

[8] In the digital version, an Excel file did display expenditure per activity broken down according to type of expenditure, but there were no totals for each type in the structure of the budget.

[9] No comparable ECOWAS activities were held in the period assessed.

The **administrative overhead** fee charged by the WCO is 4% of reported expenditure. Sida and the WCO have discussed how financial revenue should be considered in this calculus; for the purposes of this report, the surcharge is calculated on expenditure net of financial revenue[10]. This seems reasonable since financial revenue, which may be used to cover programme expenditure, may be considered another source of funding, and management overhead should be shared proportionally among all sources of finance. It also appears reasonable to include both central and local administration in the calculation of administrative costs; that is, both in Brussels and in EAC/SACU/ECOWAS. It may be argued that audit fees and annual meeting costs should be included in overheads to give a true picture of total administrative costs. Consequently, this has been done in the tables in Annex E.

The result shows that €714,200 could be considered as overhead, whereas programme costs are €1,266,000. The overhead calculated in this way is above 50% of programme costs over the whole period to June 2012 (except for 2008, when no overhead was charged). This €714,200 is based on the assumption that regional programme managers do not deliver actual programme activities, but rather organise these – thus, RPMs are included as overheads in the attached tables. This calculation can be reviewed to take in to account that RPMs do deliver some activities, such as briefing border officers and the private sector on pilots; nevertheless, probably three-quarters of their work is administrative. The conclusion is also influenced by the issue of the high charge for the RPM in East Africa mentioned above.

To sum up, the Review team found it difficult to assess cost efficiency or cost effectiveness from a combination of the financial and narrative reports.

5.5 OTHER EFFICIENCY MATTERS

One of the WCO's strongest assets is its network of experts 'lent' by Members' Customs offices. This allows the WCO to provide high-quality training and mentoring services by 'peers' at a very reasonable cost (mission expenses only). This contributes to the Project's cost efficiencies.

Within the regions, the Project has taken advantage of the experience of the larger, more advanced countries (e.g., South Africa in the SACU region) to streamline development of regional policies and procedures. For example, the draft Standard Operating Procedures (SOPs) for the Preferred Trader pilot are based on the South African model, SARS experts are co-facilitators in Preferred Trader, Risk Management and Post-Clearance Audit event. The Project RPM was invited to join SARS bilateral negotiations with the EU to transfer the knowledge on mutual recognition issues back into the programme. Similarly, in the EAC, Kenya's experience with AEOs has assisted development of the regional policy framework and SOPs.

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[10] In the Management letter for 2009, the auditors use "net" to describe gross expenditure without including financial revenue.

The Project could put to better use the WCO-supported Regional Offices for Capacity Building and the Regional Training in the SACU and EAC regions. According to the Proposal, they were supposed to be more involved than they have been. (The WCO told the Reviewer quite specifically that the ROCB and Regional Training Centres (RTCs) had no recent direct involvement with the SACU and EAC projects. For efficiency, effectiveness and regional consistency – especially as the WCO's ESA approaches consolidate – they would be a useful part of Project design in future.

In future, the WCO could take advantage of potential synergies among the three regional components, for example:

- Sharing Western Africa Stakeholder Relations and Human Resources Management work with the SACU and EAC projects (and regional training bodies)
- Sharing regional successes in Customs modernisation (eg, South Africa's HR development and risk management) and using these where appropriate as **benchmarks** in SACU and EAC. (In interviews, Customs Directors and officers repeatedly requested more analytical work on benchmarks.)
- Sharing in due course EAC AEO pilot preparations and implementation experience with SACU, so they will have an idea of what to expect when they get to that stage.

<u>Lessons learned</u>, acknowledged by both Sida and the WCO, are:

- It is important to make exact requirements known up front, even to the extent of providing templates, for example, to ensure that financial and narrative reporting contains the necessary information.
- It is advisable to communicate quickly when questions arise, and to provide prompt and complete responses.
- It is essential to supervise and monitor closely Project Offices, and tackle problems as soon as they arise.

6 Sida Columbus Project: Management and Implementation Effectiveness

6.1 KEY ISSUES

This section endeavours to respond to questions posed in the ToR.

Has the Project achieved the agreed objectives, changes, desired results and activities? Not yet, but it is moving in the right direction. In 2011 and 2012, the SACU and EAC components of the Sida Columbus Project began to make measurable progress toward the Project's overall desired results, as well as toward their individual specific objectives. In the ECOWAS region, the project only got underway in 2012 and will continue to the end of 2014.

Discussions with the WCO on 4 October 2012, meetings in the field and the latest annual report (22 November 2012) indicated that:

- the EAC component was progressing and the Authorised Economic Operator pilot was to take place in 2013, after many delays
- the SACU component was showing good momentum and better coordination, facilitating progress toward the desired results, including Preferred Trader and IT Connectivity pilots in 2013
- the Swaziland subcomponent (targeted bilateral assistance) was producing regional dividends by involving other SACU countries in capacity-building activities
- the ECOWAS and Liberia component/subcomponents were being 'revived', with a new Regional Programme Manager from February 2012 and a targeted activities programme from mid-2012 (first workshops, TA mission took place in October)
- The Ethiopia component was being completed and would not be included in the evaluation. As Sida explained on 8 October: "*Ethiopia alone was retained from the original focus on bilateral assistance that was dropped when the programme was redesigned in 2010. Ethiopia was taking off at the time, so it was decided to complete it. However, in future, Sida will focus on regional, not bilateral, assistance. Any bilateral assistance within the regional focus will be aimed at bringing weaker systems up to speed with the rest of the region.*"

> *"Thanks to the Project, we now rely more on the Revised Kyoto Convention. We have an improved, more efficient chain of command. Cooperation among authorities has improved, due to facilitation of networks, information exchange, and results of new capabilities."* (Namibia Director of Customs).

Has it been well managed overall? The WCO has been highly committed, but overstretched. Workshops and other capacity-building activities have been well managed. However, the projects might have progressed faster if WCO and regional management (e.g., RECs, PMO) had been more proactive and coherent. Ongoing weaknesses in human resources capacity, results-based strategic planning and performance management, as well as in communications and stakeholder relations require attention from early 2013. The Regional and National Project Managers, and the PT/AEO teams will need constant hands-on mentoring and monitoring (not just training and guidance) by ***professionals*** in these issues. The success of the pilots and of the Sida Columbus Project in SACU and EAC will depend on this.

Has delivery of services been improved regularly in order to better address priorities and meet targets? Priorities and targets have been tightened progressively since 2008, in order to better match capacity to deliver (both by Customs and by the WCO). The WCO has strengthened its services to the SACU Secretariat PMO during this period, but not enough to the EAC PMO. The ECOWAS component only started up in 2012, so it is too early to judge; however, the RPM appears to be taking a more hands-on approach in an effort to address a difficult situation. He may need additional support at high levels.

Have trainers and advisers met expectations? Yes – in all three regions, the trainers and expert advisers have exceeded expectations, according to workshop evaluations and interviews. Customs officers spoke very highly of the WCO-facilitated experts.

6.2 PROGRESS TOWARDS THE ACHIEVEMENT OFOBJECTIVES AND DESIRED RESULTS

Because both planning and reporting have focused more on specific, *practical* priorities since 2010, progress is now easier to manage and to track.

6.2.1 Progress toward Objectives in the SACU and EAC Regions

In the SACU and EAC regions, feedback from Customs and a broad range of stakeholders indicates that the Project has contributed strongly to customs reforms in the past 3-5 years. Customs officials at all levels gave a common message: "*Before, we didn't have a clear understanding or the wherewithal to modernise and apply good practices, Now we have knowledge, policies, structures, systems, networks and skills. The Sida Columbus Project has given us a systematic approach and a framework for change.*"

The South African Customs Service, the most advanced in the region, commented: "(Sida's) *Columbus is a good programme. Well phased, starting with diagnostics, needs assessment, gap analysis, etc, and moving in steps toward goals. Since 2010, the successes have been the building blocks for risk management, audit capacity, IT, information exchange. The Sida Columbus Project sets common priorities, shows common risks and common ways to address them. Operations have helped to make things clear and practical (eg, Operation Auto). The Columbus Project Steering Committee is the only one in the region providing a framework for action that is WCO-delivered and supported. This is a big plus."*

Moreover, business people and traders reported that in the past five years they had observed positive changes in Customs mindsets and practices, including in integrity matters.

Desk analysis and interviews highlighted the following achievements in the SACU and EAC projects in 2010-2012:

- Ownership and commitment to reforms among Customs Directors (Steering Committee Members) and teams working on specific inter-related building blocks (risk management, AEO, IT connectivity, pre- and post-clearance audit)
- Regional policy frameworks aligned with WCO standards and good practice frameworks (in key areas, national frameworks still need to be aligned with the regional ones)
- Simplification and harmonisation of customs documents gaining momentum (depends also on ICT solutions)
- Clearer progress toward goals, due to a more workable, step-by-step capacity-building and institutional strengthening since 2010-11
- Institutional strengthening to support ‘Customs in the 21st Century’ (structures, systems, tools, teams, networks, etc.), which has led to reorganisation and reallocation of resources in the majority of Customs authorities in the two regions
- Building blocks for Preferred Trader/AEO programmes identified and being put into place, with training and practice to underpin
- Enthusiasm and motivation among working-level teams (AEO, RM, IT, PM/Enforcement)
- Awareness of and confidence in new capabilities thru early successes (eg, using workshops to actually deliver key outputs such as criteria and benefits for PTs, profiling and lists of potential AEOs/PTs for pilots; using operations to focus on strengths and weaknesses and to build awareness, skills, networks and sense of common purpose)
- Greater conscientiousness regarding integrity issues
- New Customs focus on ‘service’ (versus ‘control’), recognised by private sector
- Greater awareness of need for partnership with business rather than ‘them and us’ relationship

The Project Proposals also listed ‘progress toward customs unions’ as a goal. The Project activities certainly are aligned with and support customs union objectives, but the idea of customs unions is expanding to a wider regional, and even Pan-African, idea of integration. Another stated goal was: ‘To assist customs organisations in SACU region to design and implement a comprehensive reform programme aimed at achieving the criteria for merger into the SADC region by 2014’. When the Review Team asked the SADC Secretariat what the criteria were, they said they did not know of any specific criteria in this regard.

SACU achievements (quotes from interviews with SC members, RPM, NPMs)

- *Greater acknowledgment/ownership of member states*
- *Step-by-step approach, pared down to workable goals*
- *Common understanding of need to align with WCO standards (eg, AEO needs WCO-consistent legislation to support benefits)*
- *Swaziland and Lesotho became more aware and focused on reform; receiving extra help*
- *All members have been putting in place the basics, re-engineering processes, changing mindsets, building understanding of how to use risk management, even if they are not yet ready to implement it*
- *Greater border post efficiencies in Botswana and Namibia*

- *South Africa – the ESA benchmark in many ways, with 178 preferred traders and strong risk management systems – is assisting weaker members (e.g., Swaziland, Lesotho) and has finalised Customs Modernisation legislation that the region will use as a blueprint for their own national laws.*

EAC achievements (quotes from interviews with SC members, NPMs, RPM) (ref Kenya, Rwanda, Tanzania, Uganda NPMs)

- *Project helped to align processes, establish approach*
- *Government's position on taxation and revenue collection has evolved. Government now sees benefit in the AEO programme*
- *Development of policies and SOPs in risk management, post clearance audit and authorised economic operators*
- *Formulation of pilot criteria*
- *Selection and briefing of operators and pilot sites*
- *Capacity building in policy development*
- *Greater capacity in Post-Clearance Audit*
- *Greater capacity in Risk Management*
- *Stronger cooperation among EAC Customs authorities, including smaller ones.*

SACU Achievements in 2011-12	EAC Achievements in 2011-12
A Regional Customs Policy Document was adopted by the SACU Council of Ministers, December 2011, under-pinning common strategic objectives: facilitating legitimate trade, protecting members' fiscal interests, securing accurate trade data and protecting society. This document provides the legal basis and roadmap for the region's 5 priorities: customs policy/legislation, risk management, trade partnerships (AEO, Preferred Trader), standard operating procedures, Customs IT connectivity.	The EAC regional AEO Framework was adopted. AEO Standard Operating Procedures and selection criteria were approved by EAC Council.
SACU Single Administrative Document Manual, adopted by Council of Ministers, Dec. 2011; facilitates clearance through standard trade-designated Customs forms. The SAD combines more than 40 import/export documents into one clearance template.	Regional AEO benefits were agreed by the Steering Committee: pre-clearance, local clearance, self-assessment, bond guarantee waiver, inward processing.
The Mutual Assistance Agreement Annex to the SACU Agreement was finalised. This provides a framework for mutual exchange of information among Customs authorities and between Customs and other agencies.It is a prerequisite for regional data exchange in the IT Connectivity project and advance-information exchange in Risk Management. (By late 2012, only Botswana had ratified it.)	AEO pilot sites agreed, and border officials (station managers and deputies) briefed by the RPM and NPMs on the forthcoming pilot. - Akanyaru (Burundi / Rwanda border) - Rusumo (Rwanda/Tanzania border) - Katuna (Uganda/ Rwanda border) - Malaba (Uganda/ Kenya border) - Dar-Es-Salaam (port) - Mombasa (port)
SACU, with WCO and other international and regional organisations, developed a data exchange standard consistent with the WCO Globally Networked Customs (GNC) initiative. Customs agreed the business process flows for clearance, the purpose for data exchanges, the elements to be exchanged, and the standards and parameters for exchange. The two IT pilots scheduled for early 2013 will	Long-list of AEO pilot participants agreed and briefed: 1. Brarudi - Importer - Burundi 2. Toyota - Importer - Burundi 3. Sodetra - Agent - Burundi 4. Haco Tiger Brands Ltd-Importer - Kenya 5. Freight-in-Time - Agent - Kenya 6. ROBA - Importer - Rwanda 7. Intra Speed - Agent - Rwanda 8. Trader - Agent - Rwanda

lead to a comprehensive proposal for IT connectivity in the SACU region in 2013-14. This will facilitate collection of reliable trade data, equitable revenue sharing, preclearance, data matching, information sharing and risk management. AEO initiatives cannot work without this.	9. Said Salim Bakhresa - Importer - Tanzania 10. Superstar - Agent - Tanzania 11. Nice House of Plastics - Importer - Uganda 12. Spedag Interfrieght - Agent - Uganda 13. Unifreight Handling - Agent - Uganda (Source: AEO Team, Kenya Customs)
The national capabilities to manage a Preferred Trader programme were determined (risk management, audit, ICT, Customs-Stakeholder relations); responsibilities were allocated by Customs Directors; and expert assistance was provided (hands-on workshops with practical deliverables – eg, SOPs, list of benefits, list of potential PT pilot participants, etc).	
Benefits for Preferred Traders were agreed: simplified VAT refunds, facilitated border release/pre-clearance, periodic export declearations, regional bond scheme, priority inspection.	
Trans-Kalahari Corridor Secretariat work on risk management, border coordination, ICT and business partnerships was integrated into the SACU Secretariat; Lesotho and Swaziland accepted as observers in order to participate in TKC training on these issues.	
South Africa's Customs Modernisation legislation ('Customs Bills') was set to be ratified in late 2012. Incorporating the international standards and good practices of the Revised Kyoto Convention, it will serve as a blueprint for harmonised national legislation, rules and procedures in the SACU region.	

Source: Annual Report 2011-12, 22 November 2012

Sida Swaziland Tripartite Agreement – Good Practice

In mid-2011, Sweden Customs signed a Tripartite Agreement with the WCO and Swaziland Revenue Authority to provide tailored assistance to help it overcome weaknesses that kept it from participating fully in the SACU region Sida Columbus Project. **The tailored assistance had a regional impact in its first year, benefitting not only Swaziland, but also Lesotho, Namibia and Botswana**, which had been invited to participate in the activities. The fifth SACU member – South Africa – also provided assistance and expertise. **The activities in October 2011-June 2012 are a good example of targeted national assistance delivering concrete outcomes and contributing to regional objectives**.

A workshop involving 20 participants was conducted in **10 - 22 October 2011** by an international expert from Sweden, providing guidance on forming a **criminal investigation** unit and training on criminal investigation procedures and methodologies.

During **22 January - 3 February 2012,** two experts from Sweden and UK provided a workshop on. **enforcement and risk management**. The first week delivered training on intelligence, and the second on anti-smuggling operative procedures. The 18 participants included representatives from Swaziland, Botswana, Lesotho and Namibia. Review interviews indicated that the workshop was a success. Experts said, however, that it would have been better to have had two separate groups, since intelligence and anti-smuggling involve distinct processes and officers.

Also in **February 2012**, Sida-WCO sent an expert on **data models** to assist in the Swaziland-South Africa SARS IT connectivity project, also involving representatives from other SACU countries. According to SARS, the used the 'Globally Networked Customs' (GNC) pillar of WCO 'Customs Vision 21st Century', even though it was still in the feasibility stage. Participants included a WCO expert, an Automated System for Customs Data (ASYCUDA) expert, COMESA, SADC, TKC, SACU members, Zimbabwe and Mozambique. This had very good results, achieving significant alignment in SACU. All SACU adopted the GNC approach, and SADC, etc, bought into it. The SACU Secretariat shared Utility Block development (GNC standard). A Draft Utility Block has been exchanged among members for adoption. And a SACU regional data model has been developed to share – with a positive response.

During **14 - 25 May 2012,** two Swedish Customs experts conducted a workshop on **Post- Clearance Audit**, to prepare Customs officers to manage the Preferred Trader programme. The 20 participants were from Swaziland, Botswana, Lesotho and Namibia.

According to the WCO in December, no further activities have taken place since June 2012. The activities in 2011-2012 cost €72.879,68.
Source: Interviews and WCO Draft Annual Report 2012

6.2.2 Progress toward Objectives in the ECOWAS Region in 2012

The WCO's 2010 Revised Sida Columbus Project Proposal set out the following objective:
"*To assist customs organisations in the ECOWAS region to develop and enhance management skills and competence among top and middle customs managers so they are able to run and facilitate more advanced regional projects*". The priorities were:

- strategic management
- human resource management
- implementation of WCO instruments and conventions
- integrity and good governance
- stakeholder relations
- fundraising.

The ECOWAS programme also featured direct assistance to Liberia under an agreement among Swedish Customs, Ghana, Liberia and the WCO to:

- enhance capacity to manage seaport, airport, road border operations and procedures
- build capacity to migrate tariffs to WCO 2007 HS nomenclature
- strengthen capacity to develop Standard Operating Procedures for key operational areas
- develop integrity.

In the first half of 2012, the new Regional Project Manager developed a new Proposal and Work Plan that focused on three main priorities: human resource management, stakeholder relations and resource mobilisation/fundraising. The stated purpose was *to support Customs administrations in the adoption of modern management practices*.

The annual plan for 2012 foresaw the following activities:

1. To raise awareness and knowledge about the priority topics and related good practices, prepare workshop materials and deliver three sets of workshops in the region in 2012 (each in French and in English, for a total of six sessions) on:
   - Human Resource Management
   - Stakeholder Relations
   - Resource Mobilisation (Fundraising)
2. To support project management and visibility (eg, strategic plan, risk assessment, promotional leaflet, press releases, website).
3. To coordinate the Sweden-WCO-Ghana assistance to Liberia (eg, ToR preparation with Liberia and Ghana, mission organisation, quality control of missions).

ECOWAS Accomplishments in 2012
Regional Project Manager appointed in February 2012
Detailed Project Proposal submitted to Sida in March 2012
Risk Assessment produced in February 2012
Detailed Project Work Plan issued in June 2012
Promotional leaflet produced in February 2012 Press releases/articles on WCO News site after 3 of 4 workshops in October and November 2012 (eg, www.wcoomd.org/ en/media/newsroom/2012/october/west-african-customs-administration-modernisation-wacam-project.aspx) Good media coverage in the region for workshops.
Initial Steering Committee Meeting held in June (teleconference) • Mr Perrier, WCO - WACAM Project Director • Mr Chopra, WCO - WACAM Project Manager • Mr Agyeman-Duah, ECOWAS Secretariat • Mr Kanye, ECOWAS Secretariat • Mr Sangaré, Director of Regional Office for Capacity Building, Côte d'Ivoire • Mr Anyanwu , Director of Regional Training Centre in Nigeria; seconded from Nigeria Customs , where his title was Deputy Comptroller • Mrs Ilboudo, Director of Regional Training Centre , Burkina Faso; seconded from Burkina Faso Customs, where her title was Directrice de l'Ecole Nationale des Douanes • Mr Fall, Customs Modernisation Adviser, Senegal Customs
Two (*of two planned*) regional workshops were held on Resource Mobilisation held in October 2012 in Burkina Faso (French) and Nigeria (English), with 19 participants from 9 countries in the French sessionp and 9 from 4 countries in the English one.
Two (*of two planned*) regional workshops were held on Stakeholder Relations in Sierra Leone (English) and Côte d'Ivoire (French) in November 2012. 19 Customs officers from10 countries attended the French session, and 10 people from 5 countries attended the English version.
The two planned Human Resources Management workshops were postponed to February 2013.
The website idea was being reviewed at the end of the 2012.
Four (of four scheduled) technical missions to Liberia took place (airport controls, petroleum port controls, duty-free operations, WCO HS 2012 codes). 11 ToRs prepared for missions to Liberia.

Source: WCO Annual Report to June 2012, WCO press releases, mission reports, RPM emails

During 2012, the ECOWAS project incurred costs of approximately €550,000, according to the July 2012 Progress Report and to the RPM in late December.

6.2.3 Outlook for achieving overall objectives in the medium term

The one-year extension for the SACU and EAC components, granted by Sida in December 2012, will provide vital support for the Preferred Trader, IT and Authorised Economic Operator pilot activities. These are intended to set the foundations for regional trade facilitation and compliance with SAFE, RKC and regional requirements.

The tentative SACU and EAC action plans for 2013 focus heavily on implementation of the long-awaited pilots. As mentioned earlier, additional WCO support will be needed during this period, at both the regional and national levels, because there will be many challenges to cope with.

Moreover, it will be important during 2013 to plan carefully for the post-pilot implementation stage, when different types of support will be required to sustain the momentum. This refers to the need to convert traditional capacity building into active and innovative support of institutional capacity development and commitment at all levels, including capacity to deal effectively with the external context – communications, advocacy, risk management, strategic planning, etc.

Results Outlook for SACU and EAC Components as of December 2012

- SACU region is preparing for two IT Connectivity pilots in 2013; regional connectivity proposal will follow.
- SACU region is preparing for a Preferred Trader pilot in 2013 (midyear or a bit later): have identified benefits, selection criteria, tentative sites; but will still need to identify participants and deal with technical, ICT and information exchange details.
- SACU implementation of the Preferred Trader scheme will probably take 2 years or so (eg, until end-2014)
- SACU implementation of AEO is likely to take another 2-3 years after that (eg, until 2016-17)
- The EAC region is preparing for its AEO pilot(s) in 2013: has identified potential participants, benefits, sites; working on identifier and other technical, ICT and information exchange details
- Full implementation of regional AEO **is** likely to take another 2 years after that (eg, until 2015).

To sum up: The SACU and EAC components are likely to have wrought some important changes in knowledge and awareness, mindsets, policies, procedures, systems and relationships. While they will not attain their objectives before the Sida Project ends in December 2013, if the IT, Preferred Trader and AEO pilots are completed successfully and implementation of PT/AEO regional programmes ensue, the countries will be on the right track towards compliance with the RKC and the SAFE Framework.

Full regional implementation of the Preferred Trader and AEO programmes over the next five years or so would represent major progress towards achievement of the Sida Columbus Project's objectives and desired outcomes[11], because it will mean that the 'building blocks' will have been institutionalised and made operational. **If all goes well, both regions could reach 'compliance in key areas' in the next five years.**

In the **ECOWAS region**, the action plans for 2013 foresee additional institutional-strengthening activities, as well as the programmed support for Liberia. During the first quarter of 2013, the two regional workshops on Human Resource Management are scheduled to be implemented, and a second Steering Committee meeting is to take place. The Risk Management Plan from the February 2012 Proposal will be updated. Follow-up sessions of the 2012 Resource Mobilisation and Stakeholder Relations workshops are scheduled to be held, as a means of monitoring progress.

All subsequent activities in 2013 and 2014 will be related to generating demand from the national customs administrations that participated in the workshops. The plan is to conduct scoping missions, collect high-quality requests and then enter into specific technical national support missions.

[11] Customs modernisation and compliance with SAFE Framework and Revised Kyoto Convention.

> *"The regional (workshop) activities are to act as awareness raising and initial training/capacity-building activities in the three focus areas of the project. The aim is to introduce key principles (methodology and tools) and modern management practices in the three focus areas of the project to the member administrations. At the end of the workshop, the participants are able to reflect on and in some cases apply these principles and practices. However, these workshops are only the 'introduction' to the capacity-building work to be done at the national level and should be seen as such."*
>
> *Each workshop participant was asked to produce an Action Plan at the end of the workshop. I have made a copy of these action plans and will soon (early March latest) get back to them to see how they have progressed on their action plans since the workshops….*
>
> *I have quite a clear idea of the major needs of each participating countries and I will now enter the follow-up phase to start the scoping missions at the national level soon. My plan is to maybe have 3 to 4 countries per component and to have a clear (Customs-endorsed) roadmap for capacity-building activities for a year or so in each country. I am quite keen on achieving some results at the outcome/impact level … but I will really only focus on the countries where we have a clear chance of achieving sustainable impact.*
>
> *In the field of HRM for example, there is a need to reformulate all Job Decriptions and Performance Appraisal Fiches - the concept o RB, and SMART objectives and QQT indicators are not embedded in the system yet and we need to get the buy-in of the highest authorities to review JDs and performance management system. This could 'officially' be achieved during the scoping missions when the authorities endorse the roadmap/workplans, which will include the milestones and KPIs."*
>
> Richard Chopra, Regional Project Manager for the ECOWAS component, January 2013

If the ECOWAS workshop participants and national Customs administrations apply what they learn, by 2014 Customs administrations may increase their capacity to manage change, as per the desired outcomes. However, this timeframe is too short for any sustainable impact to occur, especially if the capacity-building activities only start in 2014 in response to the needs identified in the 2013 scoping missions. To measure results and eventual impact, scoping missions would need to prepare detailed baselines, document specific needs, and design practical indicators to track and measure improvements.

6.3 QUALITY OF MANAGEMENT

To date, the WCO management approach has been to:

- provide the basis for the project (e.g., funding and project office and staff, Steering Committee and National Project Managers);
- assist with activity planning;
- provide a Brussels-based project manager ('key contact'), experts for workshops, etc.; and then
- take a relatively hands-off stance.

A more proactive, hands-on approach may work better, as is explained below.

6.3.1 Organisational structures

The **SACU** component has been the better managed since 2010. This is due to two factors: 1) established in 2010, the project office is located in the SACU Secretariat Revenue Management and Trade Facilitation Division, where the RPM has parameters and a support infrastructure (including supervisor, colleagues and accountant); and 2) the Sida WCO project officer in Brussels (Elke Portz) has overseen the SACU component for several years, devoting considerable time to mentoring and training the RPM and the associate officer.

By contrast, the **EAC** RPM is housed in an independent Project Office in Kampala, and has a part-time administrative assistant since 2011. The RPM was largely left on her own, especially during mid-2010 to late 2011, by a succession of Brussels-based project officers (three since 2008, all from Swedish Customs); they were experts in technical Customs issues, not necessarily in management of Africa-based aid projects.

In addition, while the role and performance of the SACU RPM appeared to be well understood among Customs directors and officers (after some proactive work by Ms Portz and the SACU Secretariat), in the EAC interviews indicated that they were not.. The lack of proper performance management, support and supervision during 2008-2011 led to accumulation of a number of problems, including inadequate planning, communications and financial management. This in turn led to delays in implementation, including Steering Committee meetings and the AEO pilot. Some Customs Directors have called for a review of the RPM's role and for the EAC Secretariat to play a stronger part in the project.

In the Mitigating Action report submitted to Sida in early 2012, the WCO undertook to provide more support to the EAC RPM, and to apply SACU-proven practices. They assigned Ms Portz as the 'key contact', initiated fortnightly teleconferences, applied SACU financial reporting templates, and extended the role of the personal assistant to cover bookkeeping. While Ms Portz was successful in helping to improve performance in the SACU project office, she may not have the opportunity – or the time - to do so in the EAC. In late 2012, she was handing over her Sida Columbus Project responsibilities to Mats Wiktor, the newly appointed Sida Project Officer who also had responsibilities for the EAC in the previous year. Ms Portz is due to return to her home Customs office in mid-2013, and she hopes to remain the key contact for the SACU component until she departs. That would be advisable during this challenging year when they are planning to initiate the Preferred Trader pilot.

In the ECOWAS region, the ECOWAS Secretariat had no interest in housing the project office. The RPM was to be posted to the Côte d'Ivoire, but that was cancelled due to civil unrest. Thus the RPM, who started working in February 2012, is based at the WCO Secretariat in Brussels. However, the WCO-supported ROCB in Côte d'Ivoire and the RTCs in Nigeria and Burkina Faso (managed by seconded Customs officials) are playing a helpful role in the Steering Committee and in implementation of the workshop activities. The RPM appears to be managing the project well, applying results-based concepts and endeavouring to make the best of a challenging environment in the West African region. Since the project will focus mainly on national assistance during 2013-14, a more formal regional structure may not be necessary.

The **lessons** here are:

1. At the design stage it is essential to determine the type of structure, people and management support that will be required to achieve the objectives. All options need to be assessed against clear results-focused criteria. What may be right for one region may not be for another.

2. Despite laudable objectives of conferring ownership and promoting sustainability, a hands-off approach in an inadequately designed and monitored context does not deliver the desired results.

Results orientation: The WCO is taking steps to address weaknesses in results-oriented management. The Reviewer understands that improved systems will be put in place in 2013. Combined with appropriate internal capacity building, this should strengthen strategic planning, and project and performance management.

The dearth of results-based planning and reporting, and of baselines and practical indicators in the EAC and SACU components made it difficult to conduct a systematic analysis of performance against plans. The WCO's expert evaluations of performance against plans, promised in the 2008 and 2010 proposals, did not take place. The management undertakings in the two proposals (sections 9.5-9.7) did not fully take place (*see Annex F*), nor was the management approach set out in the second proposal revised to reflect lessons learned in 2008-2010. In fact, the text was hardly changed at all.

How do management and delivery compare to other similar projects?

The Review Team interviewed TradeMark Southern Africa and TradeMark Eastern Africa representatives in three countries (South Africa, Kenya and Rwanda). This DfID- and Sida-supported programme has, among others, engaged in trade facilitation activities in the same countries in Southern and Eastern Africa as the Columbus Project. TradeMark is generally well organised, structured and resourced; it is results-oriented and linked into regional organisations, including the EAC Secretariat, where the Columbus Project has faced challenges.

In designing any future Sida-supported Columbus Project, Sida and the WCO may wish to consult with TradeMark directors Mark Pearson (Southern Africa) and Scott Allen (Eastern Africa) on lessons learned and on the possibility of joint activities, including in crosscutting issues (gender, SMEs, environment, etc). They have, for instance, some good ideas on how to incorporate small and microtraders (mostly women) into Preferred Trader-type programmes. This is an issue in which Sida has an interest.

The **ECOWAS component** since 2012 has the clearest results framework of the three components. Nevertheless, some improvements could be made. For example, while it is clear that capacity building in management basics is needed by Customs administrations, it was not clear from the February 2012 Proposal or the May Work Plan how the desired improvements would be monitored and measured <u>in a meaningful way</u>. The indicators provided are rather general and do not refer to any statistics or survey results that would set a baseline <u>for the beginning of the project in 2012</u>.

ECOWAS Performance Indicators

"The Project Purpose-level result statement is: *Customs Administrations from ECOWAS member countries adopt modern management practices.*

The performance indicators for this result include:

i. Customs officials applying new knowledge and practices in human resource management practices

ii. Stakeholder relationships are managed in a structured way

iii. Resource mobilisation needs are well defined and clearly articulated

In the case of Liberia, the performance indicator will be relevant to the specific capacity building planned …: *Liberian officials applying new practices and knowledge on HS Nomenclature/operations /SOPs/integrity/etc*."

Source: ECOWAS/WACAM Project Proposal, page 25, February 2012

There are no criteria to define: ‘new knowledge and practices’, ‘structured stakeholder management’ and ‘well defined and clearly articulated’.

The work plan says the project will report outputs annually (indicators are: number of people trained, number of workshops, number of missions, etc) and do a survey and assessment at the end of the project, relying on baselines established in the diagnostic studies carried out in 2007-2008. This may not give a realistic picture of the performance of the ECOWAS project in 2012-14, since national and regional circumstances in 2007 would have evolved by the time the project started in 2012. The component suffered major delays due to a lack of in-depth analysis, needs assessment and consultation in 2007-08 (the original IT-related project turned out to be inappropriate for the region at the time). While broader consultations have been carried out in 2012, analysis and rigorous needs assessment have not. These would be necessary in order to set appropriate baselines and indicators for measuring the performance of *this* component.

The Liberia component has the potential to deliver some measurable results, if proper baselines and indicators can be set. Some might even have regional connotations.

6.4 QUALITY OF OUTPUTS AND ACTIVITIES

Since late 2010, the sequencing and linkage to results of activities and outputs have improved. Most of the WCO workshops and other activities are now linked to the building blocks of the Preferred Trader and AEO programmes (see pyramid in Section 2.3). Participants particularly appreciated the practical, hands-on nature of these activities. They were proud of the practical outputs, including as data sets, risk management profiles, criteria and benefits for Preferred Traders and AEOs, standard operating procedures, and lists of potential pilot candidates in each country.

Customs officers also strongly valued the joint operations (e.g., Operation Auto) that tested their skills in a variety of areas, and led to greater awareness of their strengths and weaknesses, networks, and and a sense of common purpose. Many were motivated because they were able to use these newly acquired skills, networks and products (e.g., profiles) immediately in their day-to-day work.

The workshop evaluations in ECOWAS and the interviews in SACU and EAC revealed a high regard for the experts and trainers.

“The reports produced by SACU were relevant and cogent and dovetailed well with the reports my colleagues and I produced for WCO following each mission. They clearly laid out what was expected of the SACU countries to take forward recommendations and learning.” (Expert Trainer/Adviser)

In SACU and the EAC, workshop evaluations were the exception rather than the rule. The WCO therefore has little basis for monitoring results. The ECOWAS/WACAM project does request participants to complete evaluation forms after workshops. The box below looks at the first set of evaluations and workshop materials.

ECOWAS Workshops and Evaluations

In the **ECOWAS** region, the West Africa Customs Administration Modernisation project (WACAM) held two out of the three planned workshops in 2012: *Resource Mobilisation (Fundraising)* in September and *Stakeholder Relations* in November. The third: *Human Resources Management* was postponed to 2013. The evaluation for the *Resource Mobilisation* workshop was made available to the Review Team in October. Eight participants in the English-language workshop and 14 in the French session completed the evaluation form.[12] Generally, they appreciated the workshop's relevance, content and mode. However, in their view, 4½ days was too short.

A review of that workshop's material (English version) indicated that generally the training materials were of high quality and covered both theory and practical aspects of preparing funding proposals. This mix was appreciated by the participants.

The materials indicated that the workshop was more oriented towards 'selling' a business case than creating a project plan that would address development needs aligned to a national and/or institutional strategy, and seemed to favour the easy-to-implement over the complex and difficult[13].

Benefits were generally described in financial terms[14]. The private sector as a stakeholder was hardly mentioned. This focus on financial benefits may have neglected the following aspects, which are important for achieving overall project and Columbus objectives:

- Regional cooperation and integration (targeting solely donors for fundraising may exacerbate competition for funds)
- Achieving development results, which goes beyond a 'business case'
- Narrative and financial reporting, audit and M&E (including baseline data), since meeting donors' different reporting requirements is an important aspect of successful fundraising
- Sustainability: supporting participants *after* activities, eg, a help-desk or mentoring function, as well as ways of spreading the skills (train-the-trainer and sharing new skills with colleagues). A broader approach to capacity development is important (and is mentioned by Sida Columbus Project participants as an essential element)
- Support for cooperation and networking among participants and organisations (not least, across language barriers).

The WCO may wish to consider the following themes for future activities: Issues and Risk Management; Managing Communications and Visibility; Managing Crosscutting Issues.

Source: Sten Ström, Review of ECOWAS Fundraising Workshop, 2012

6.5 COMMUNICATIONS AND VISIBILITY

6.5.1 Communications and Stakeholder Engagement

Communications are a major success factor in any project. In the Sida Columbus Project, communications span three main levels: Project to Project; Project to Customs; Project to other stakeholders. All three need attention. In fact, a top priority for 2013 and beyond is to implement more effective and strategic communications, within the project as well as with external stakeholders – primarily high-level decision-makers, business, other agencies, and donors.

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[12] Handout 5C2 dated October 19th and October 12th, respectively – pdf copies of evaluations
[13] Day 1 slide 7 and 21, Page 31
[14] Template 2B on page 6, with a few other benefits described on page 30

As mentioned earlier, ownership and stakeholder relations remain big challenges for Sida's Columbus Project, although the situation has improved since 2008-10. While the Project *per se* is widely accepted and appreciated by the officers who are directly involved, in the EAC and SACU regions the changes it inspires meet resistance at different levels of Customs and even in the trading community. This is due to incomplete understanding, a lack of participation in designing and implementing the reforms, and inadequate communications. Although resistance to change is a challenge in any major reform effort, stakeholders interviewed believed the Project could do more to address the specific issues listed.

Both the SACU and EAC projects have communications strategy documents; however, these are far from being the comprehensive strategies that are required to deal with the challenges the projects are facing.

Moreover, the SACU and EAC Columbus Project websites/webpages are out of date and/or uninformative. The website for the EAC region had not been updated since October 2011 when the Reviewer looked at it in December 2012. The relevant webpage at the SACU Secretariat needed a major overhaul; it appeared to have had few updates since 2007. In fact, the whole SACU Secretariat website was difficult to navigate.

In addition, the use of terminology is not consistent in Sida Columbus Project documentation, including annual reports, Sometimes two or three different terms were used for the same or similar concept. For example, the terms Preferred Trader, Trusted Trader and AEO were sometimes used interchangeably, even if they mean different things in practice. If broader regional integration is the ultimate goal, then the terminology would need to be consistent across the various regions.

In the ECOWAS region, the Project's emphasis on management basics is widely accepted, and the communications strategy is simple and straightforward. However, regional ownership has not been consolidated; the Steering Committee has just three Customs representatives, and two of these are the Regional Training Centre managers. Generally, the project would benefit from a broader focus. As Regional Project Manager Richard Chopra commented in November 2012, "*If you look into the overall objective of the WACAM project, we are dealing with the development of strategic management capacity and hence, at this stage, we have not engaged with NGOs nor the Private Sector in the region. However, we expect to engage with them next year, especially in the context of the Stakeholder Relations component of the project.*"

6.5.2 Visibility

Project activities (workshops, etc) have received good coverage in regional media and on the WCO website. In addition, the Project was promoted by the Regional Project Managers at three events in 2012: a Capacity-Building Directorate conference in Brussels in February, a WCO donor meeting in Mauritius in March and a WCO AEO conference in Korea in April.

The Sida and WCO names and logos figured prominently on most reports, meeting and workshop documents, and press releases, To date, the Sida-funded Project has been visible mainly to those who have been directly involved (i.e., Customs officials, experts, a few business groups, regional integration bodies, corridor managers and other donor projects). In the SACU region, interviewees primarily referred to it as the 'SACU Project' or the 'WCO-SACU Project'. In Kenya and Rwanda, it was the 'WCO Project'. A few people called it the 'Sida Project'. In the ECOWAS region, it is the WACAM project.[15]

6.6 CROSS-CUTTING ISSUES: GENDER, ENVIRONMENT, ENDANGERED SPECIES

This section reviews how the Sida Columbus Project has addressed issues related to gender, environment and endangered species.

The original 2008 Sida-WCO Columbus Project Agreement states in Article 4: "*The WCO undertakes to fulfil the following obligations during programme implementation: … take into account gender issues as regards women's participation in target groups and selection criteria, and skills development opportunities…*"

The WCO's 2010 revised Sida Columbus Project Proposal states: "*Apart from the consideration of gender equality through the development of HR strategies, WCO will promote equitable participation of women and men in project training activities. Contribution to environmental sustainability is one essential project expectation for most external donors. Even though consideration of environmental aspects is not the major focus of a programme of this nature, it has the potential to have a positive impact on the environment through building customs capacity to better implement international agreements such as the Convention on the Trade of Endangered Species (CITES) or the Basel Convention on Hazardous Wastes. WCO supports the United Nations Environment Programme (UNEP) Green Customs Initiative (GCI) which aims at strengthening compliance with and enforcement of multilateral environmental agreements (MEAs) through specific assistance in combatting illegal trade in commodities of environmental concern. It focuses on joint awareness-raising for customs authorities on all related agreements and conventions by developing common tools and programmes to be eventually integrated in the national customs training curricula.*"

6.6.1 Gender

Women are well represented in Sida's Columbus Project activities in SACU and the EAC regions. Both Regional Project Managers are women, many of the National Project Managers are women (appointed by Customs Directors), and many of the participants in workshops have been women. In fact, women are well represented in senior positions in most of the Customs authorities in the SACU and EAC regions.

[15] In West Africa, there is another WACAM: the Ghana-based Wassa Association of Communities Affected by Mining, a human rights advocacy group. http://www.wacam.org and http://oecdwatch.org/organisations-en/wacam-wassa-association-of-communities-affected-by-mining.

In the ECOWAS region, the WCO's Sida Columbus Project proposal foresaw work in the area of gender equity. Women are not as visible in Customs administrations, nor in Workshop participation as in the other two regions. The May 2012 Work Plan suggested that a gender equity specialist be hired under the Human Resources Management component to develop concrete deliverables for the project regarding gender equity policies for customs administrations. These deliverables would be included in the HRM training package. The WCO may also wish to pursue better gender equity in workshops.

Throughout the three regions, the main gender issues appear to be at the border. Numerous border management and border development projects target women traders, which tend to make up about 80% of the largely infornal border trading community in Africa. These women frequently face harrassment and worse, and are regularly tapped for bribes.

The Review Team interviewed women traders at the Botswana-South Africa and Rwanda-Tanzania border posts. Their main message was that they needed organisation, and that both they and border officials needed education and awareness-building in order to understand their respective rights and obligations. They also needed better border infrastructure, with facilities for women.

At the Botswana-South Africa (Trans-Kalahari Corridor) border post, the station manager said that regular women micro-traders received special treatment – for example, they were allowed to use the personal baggage form for small consignments to avoid having to pay the clearing agents that congregate at the border.

At the Rwanda-Tanzania Rusumo border post, the Rwanda station manager had just returned from giving a presentation on rights and obligations to the Women Border Traders Association in Rusumo. The two station managers said that women traders received no special treatment, and the women interviewed there confirmed that. Their problems were the same as those of the men (classifications, valuation, sanitary and phytosanitary interpretation, and other nontariff barriers). The four Rwanda traders interviewed suggested that border traders associations from both sides should combine, since they all faced the same problems, and, being in the EAC and the WTO, in principle, had the same rights.

When asked why there were so few women border officials, the station managers said that few women wanted to be posted to the border areas, since usually they could not bring their families with them.

This may be an opportune time to consider consider how to adapt aspects of the Preferred Trader schemes for small and micro-traders. According to Project documentation, Sida has been interested in such an endeavour for some time. The opportunity exists to consult and join forces with donors and NGOs who are working on border development and women trader issues. For example, TradeMark East Africa in Rwanda expressed an interest in joint planning and implementation on gender and other border issues.

6.6.2 Environment and Endangered Species: Possible Synergies between the Columbus and GAPIN Projects

Because Sida may assume responsibility for any new project related to wildlife trafficking, it requested the Review Team to explore synergies between its Columbus and GAPIN Projects. (See GAPIN Review later in this Report.)

As indicated above, the WCO's 2010 Sida Columbus Project Proposal noted the "*potential to have a positive impact on the environment by building customs capacity to better implement international agreements such as the CITES"*.

The GAPIN Project consisted of two related components in 2010-11 and 2012, with the following objectives.

Objectives for Project GAPIN I (October 2010-March 2011)
(quote from 31 May 2011 WCO Report on GAPIN I)

- Build up enforcement capacity of Customs officers for enforcing CITES
- Prevent, investigate and repress illegal trade in protected wildlife
- Promote communication and cooperation among participating countries
- Raise awareness among Customs officers in the area of wildlife enforcement
- Gain insight on trends of illegal trade in protected species of wildlife
- Enhance integrity in Customs in relation to wildlife enforcement.

Objectives for GAPIN II (January - December 2012)
(quote from the WCO's November 2011 Proposal)
Strategic-level objectives

- Building up enforcement capacities of Customs, in particular of frontline officers
- Keeping on raising awareness on integrity issues
- Enhancing risk management and the detection, investigation and prosecution capabilities of Customs
- Improving existing communication and cooperation amongst involved partners
- Raising public awareness on the role of Customs and other relevant law enforcement agencies in the area of wildlife enforcement
- Raising public awareness on the misconception of the medical value of certain wildlife products (eg, rhinoceros horn)
- Promoting cooperation among relevant national, regional and international environmental bodies
- Identifying new threats.

Operational-level objectives

- Detecting, intercepting and seizing illegal wildlife shipments
- Improving operational cooperation between Customs and relevant environmental agencies and police on the ground
- Creating conditions for proper follow-up actions (eg, controlled deliveries)
- Preventing corrupt behaviour and taking appropriate measures.

Synergies

The Sida Columbus Project's strong focus on the implementation of the 2005 WCO SAFE Framework of Standards has a number of synergies with the above objectives. The SAFE Framework is a comprehensive instrument containing 17 standards to which Customs Administrations are expected to adhere. The 17 standards focus on four core elements: advanced electronic information; risk management; authority to inspect high-risk imports, exports, and goods in transit; and customs-business partnerships. SAFE also pursues integrity within Customs Administrations.

Synergies exist in several areas related to the two Projects' common aims of:

1. enhancing Customs cooperation
2. strengthening risk assessment and management
3. combatting illegal trade
4. promoting integrity.

Cooperation and awareness: Participants in Sida's GAPIN and Columbus Projects said that joint operations have been a good way to enhance common vision and cooperation, both within Customs and among authorities. The model: *briefing/capacity-building →operation → debriefing/ lessons learned* - has helped raise awareness of the issues and risks, and of what needs to be done. The joint capacity building/briefing and joint operations have also led to more effective information-sharing networks (often involving people who are simultaneously participating in Columbus and GAPIN). Some participants said this helped 'revive' the Customs Enforcement Network (CEN) and the RILO in the ESA region. Both Columbus and GAPIN have highlighted weaknesses in cooperation between Customs and other organisations and government agencies; both need a stronger focus on stakeholder relations and communications in any future iteration.

Risk management: Both projects have placed strong emphasis on risk assessment and risk management. In many cases, the same teams have been involved in both projects.

Integrity: As mentioned above, both Columbus and GAPIN have an integrity focus, and the same officers and similar challenges arise in both projects. Participants said that, in both projects, putting corruption issues on the table for discussion was a 'first'. This, they said, alleviated the 'taboo' associated with raising corruption issues and made it easier to understand causes and effects. Integrity efforts must continue in a persistent and broadbased manner, employing innovative methods as well as basics to overcome longstanding problems, including risks Customs officers face in trying to combat corruption, income-related issues, HR practices, etc.

***Combatting illegal trade in endangered species and CITES implementation*:**
GAPIN has made inroads in raising awareness, creating networks and providing frontline officers with techniques and tools. To build on this, a more cohesive and inclusive long-term approach is required. This goes beyond Sida-WCO cooperation. However, relevant capacity building could be integrated with the WCO's umbrella Columbus Programme assistance on risk management, etc.

Sum-Up

In regard to synergies with any future Sida Columbus Project, should Sida and the WCO decide to pursue the GAPIN objectives (in principle, if not in the GAPIN name), the most efficient way may be to integrate relevant awareness- and capacity-building activities into ongoing WCO technical assistance (e.g., Customs risk management, enforcement, border management and integrity activities), and into joint operations.

For maximum effectiveness in combatting illegal trade, these WCO TA activities should be part of a more strategic, programmatic and inclusive approach involving all relevant international bodies, as well as stakeholders in origin, destination and transit countries. The prerequisites are in-depth analysis, a thorough review of the lessons learned to date, and innovative strategies to secure political will and combat increasingly complex wildlife and other organised crime.

7 Sida Columbus Project: Main Findings and Conclusions

Launched in 2008, the Sida-funded Columbus Project has been a challenging experience for all concerned – Customs Directors and officers, WCO, Sida, the SACU Secretariat, and the Regional and National Project Managers. For all three components (Southern, Eastern and Western Africa), the main lessons learned in the first phase (2008-10) were: 'Don't bite off more than you can chew' and 'Don't try to run before you learn to walk'.

This hearkens back to the discussion on theory of change in Sections 2 and 4, and the importance of carefully thinking through all the steps and all the interlinking issues that will have to be addressed in order to attain the milestones and objectives in a timely fashion.

In Southern and East Africa, the past 18 months (2011-2012) have seen encouraging progress, emerging from an extended period of groundwork and building confidence and competence. Much remains to be done, but if the lessons learned and recommendations below are applied quickly and sustainably, the results should be positive. The West Africa component has also made encouraging progress in its first 12 months.

7.1 WCO PERFORMANCE IN DESIGNING AND IMPLEMENTING THE SIDA COLUMBUS PROJECT

The Sida-funded Columbus Project has constituted a major learning experience for the WCO Capacity Building Directorate. Originally meant to implement pilots, the SACU and EAC components have in effect themselves been pilots in capacity building and donor relations for the WCO. Each component has been handled in a different way. Mistakes have been made, successes have been celebrated, and many lessons and pieces of advice have emerged – especially regarding planning, management and communications.

The lessons learned and recommendations below focus on improving EAC and SACI Project management (by WCO and the regional project offices) enough to deliver the pilots and related activities successfully in 2013 and to design a subsequent Project that will build on the gains to date and lead to the desired results in the next five years or so.

7.2 PROSPECTS AND CONDITIONS FOR ACHIEVEMENT AND SUSTAINABILITY OF DESIRED RESULTS

This section refers primarily to the SACU and EAC regions. The recommendations in the following chapter also address sustainability issues.

Has enough been accomplished to ensure that the desired results and changes in behaviour will be attained and sustained? Sida's Columbus Project is delivering the basis for strong foundations, but much remains to be done to ensure sustainable results. An intensive, hands-on and professional effort is required to sustain the current momentum and develop broad commitment to the change agenda. It is also important to focus more on an enabling institutional environment. The results will only be sustainable if the institutional, legal and operational frameworks are consolidated visibly at the national and regional levels, and if the WCO, regional peers, the business community and donors exert continuous pressure on Customs and Governments. This will require additional targeted national assistance and better donor coordination.

By December 2012, to what extent will the Customs Authorities assisted by these projects be capable of meeting the project objectives? At end-2012, The Customs Directors and officers we met were confident that they would be capable of meeting the objectives in the next five years, if the WCO and other assistance providers would continue to assist them in a more harmonised fashion, and if top decisionmakers would provide the necessary support.

To what extent have Customs officers adopted and taken ownership of the changes necessary to attain the desired results? The Customs Directors and officers directly involved in the Project expressed strong ownership and commitment. However, they said that levels above and below were resisting the changes, and that addressing this resistance should be an urgent priority. The Reviewers' impression was that there was more relative consensus and 'team spirit' among SACU Customs Directors than among those in the EAC. Turnover in both regions has caused some problems and setbacks. In addition, the EAC Steering Committee had not met formally in over a year (at November 2012), while the SACU SC had met at least twice.

Sustainability and phase-out strategy: when will the programme be able to work on its own? After the pilot stage in 2013, there will be a further phase of up to five years in which the countries will implement the PT/AEO programmes and attain compliance in key areas of SAFE and RKC. They will still need help during this period, though it can progressively be phased out as they near the goals. Hence, a 3+2-year programme of assistance would probably suffice. After that they could manage on their own, with continued on-demand requests to the WCO for assistance in supply chain security and other more globally focused issues. The WCO's broader Columbus Programme does not have an end-date, but rather contemplates a continuous cycle of needs assessment, assistance and M&E.

Prospects and Conditions for Achievement of the Desired Results

Sida Columbus Project	Comment
Desired Outcomes by 2012, as per the original 2008 assessment and proposal (remained valid in 2010) proposal)	The outcomes were not achieved by 2012. However, progress is evident in the SACU and Eastern EAC.
• *Regional Customs services working to a common regional customs code, which in key areas is compliant with the Revised Kyoto Convention, the SAFE Framework of Standards and regional requirements*	Good progress is occurring in SACU and EAC. It will be important to keep up the momentum by delivering cost-benefit analysis, tangible results in key areas and broadbased 'buy-in' (overcome resistance to change). Post-pilot needs assessments should be undertaken.
• *Increased capacity in Customs organisations to plan, programme and implement change-management projects.*	Good progress in SACU and EAC, though still a way to go, especially as concerns the smaller members. An ECOWAS component focusing on this outcome began in 2012. *Targeted national support will be necessary to achieve regional objectives*. This will require effective donor and stakeholder cooperation.
Specific Objectives, as per the 2010 proposal, and further prioritising in 2011	
1. *An <u>EAC</u> trade facilitation framework fully operational by 2012.* <u>Priorities</u>: AEO, risk management, post-clearance audit systems	Regionwide policies and standard operating procedures have been approved, and the first AEO pilot designed (selection criteria, benefits, participants and sites). Training on risk management and audit continues. While the pilot will take place in 2013, the trade facilitation framework will not be 'fully operational' during the life of this Project. A Regional Action Plan guides activities. The Regional Project Manager will need more proactive WCO support in 2013 to manage the challenges associated with the pilot and its follow-up. Communications and stakeholder relations are a top priority. Post-2013 planning – including for a different project structure - needs to start now. Regarding the objective, a definition of 'fully operational' and indicators of progress and benefits would help to focus and monitor performance.
2. *A uniform set of <u>SACU</u> customs policies and procedures that will reduce costs for legitimate trade, maximise revenue collection, provide social protection, and generate accurate statistical information.* <u>Priorities</u>: policies/legal base; trade partnerships (preferred trader), risk management, IT connectivity, standard operating procedures.	A Regional Customs Policy was adopted by the SACU Council of Ministers in December 2011, after two years of negotiations. It provides a roadmap for all 5 priorities. South Africa's Customs Bill will provide a blueprint for the region in 2013-14. National action plans exist, but region-wide harmonisation and implementation is likely to take time (after 2014). A regional Single Administrative Document was agreed, replacing more than 40 clearance forms. The first Preferred Trader and IT connectivity pilots will be held in 2013. During 2013, improving communications and stakeholder relations will be a major priority, along with extra WCO support for carrying out the Preferred Trader pilot and preparing for the subsequent stage. Capacity building on risk management, audit and enforcement remain top priorities. A checklist of the policies and procedures that will achieve each of the goals (reduced costs, maximised revenues, social protection, accurate statistics) would help focus efforts, communications and coordination. Baseline data, milestones, progress indicators and 'key messages' will be useful in communicating 'wins' and

	securing ‘buy-in’. This will be important for the 2013 Preferred Trader pilot stage and thereafter.
3. *Enhanced management skills and competence among top and middle ECOWAS region customs managers, so they are able to run and facilitate more advanced regional projects.* Priorities: human resources development, stakeholder relations, resource mobilisation.	Workshops on resource mobilisation, stakeholder relationships and human resource management took place between October 2012 and February 2013. They are to serve as the springboard for demand-driven national assistance projects. Conditions for achievement of objectives include: (1) current needs assessments anchored in regional and national realities, and (2) 2012 baselines and clear performance indicators to monitor progress and refine service delivery in the period to Dec. 2014.

8 Sida Columbus Project: Lessons Learned and Recommendations

This section contains three parts: (1) Overall lessons learned and recommendations; (2) Recommendations for Sida; and (3) a Checklist for WCO action in SACU and the EAC in early 2013. **Most of the lessons and recommendations concern the SACU and EAC components.** The good management practices are of course applicable to the ECOWAS component, and there are a few ECOWAS-specific suggestions.

8.1 OVERALL LESSONS LEARNED AND RECOMMENDATIONS

The Sida-funded Project has gained momentum. Capacity development at both the individual and institutional levels is clearly advancing. Customs officers interviewed at all levels stated that without the Project, they would not be where they are today in terms of customs modernisation, trade facilitation and reform. The key messages for Sida's Columbus Project were remarkably consistent across the stakeholder groups, providing a strong basis for considering the way forward, in terms of building on strengths and overcoming obstacles.

To consolidate the achievements and set a foundation for sustainable progress, the following lessons and recommendations should be acted upon from early 2013, and built into any subsequent programme.

Project Design and Management Structures

- Rigorous and regular analysis of national needs, priorities, challenges, etc., is required, since in the next stage enhanced assistance at the national level will be necessary to achieve regional objectives.
- Sida's Columbus Project had too many objectives on paper, and the theory of change was not well thought through. In future Projects, it would be best to aim for one overall objective, and very few, very specific and measurable objectives and targets. Solid baseline data, benchmarks and performance indicators will be needed to improve monitoring and to use in advocacy.
- A more hands-on approach is needed in project management. The WCO Capacity Building Directorate should assign project officers who are highly qualified and experienced in designing and managing results-oriented aid projects. Officers seconded from national Customs services often do not have these skills, though their technical expertise is invaluable for project design and implementation. So a team approach consisting of experienced aid project managers and technical experts could be a win-win solution.
- Such a team should engage closely with field projects, mentoring, supervising, monitoring and managing performance – in the field as well as from Brussels – until the projects prove consistently (e.g., over two years) that they can deliver activities, results, reporting, etc., to plan and on time. If the WCO staff members assigned to manage a project are performing well and delivering results, it would be good to retain them for the life of the project.

- The right organisational structure and support framework can make a big difference. At the design stage it is essential to determine the type of structure, people and management support that will be required to achieve the objectives. This lesson should be applied in 2013 to planning for any new Project. The current structure may not be appropriate for subsequent stages where implementation will be the priority. (See Checklist below.)
- Reporting requirements and expectations should be made clear at the beginning (including deadlines, formats, templates). Adherence should be part of the contractual/performance agreement.(This applies to the WCO's regional project management arrangements as well as to the Agreement between Sida and the WCO.)

Human Resources in the Field

- The role of the RPMs should be reviewed, in line with requirements for pilot implementation in 2013 and beyond.
- NPMs may need to be dedicated officers. At present, they are not dedicated full-time officers; they have high turnover, and are not being used effectively. This needs to be addressed. (The SACU Steering Committee Meeting in November discussed this issue and made recommendations.) If NPMs are expected to help drive change, they need to be given the tools and authority to do so. They also should be involved in all Project activities.
- The WCO Regional Offices for Capacity Building and the Regional Training Centres should become an integral part of Project design and implementation in future - for efficiency, effectiveness and regional consistency.
- Mission Reports should have a common template and be results-oriented. They should provide details of the activity conducted, lessons learned and challenges faced, and views on evolving needs and the capacity of beneficiaries to achieve the objectives in the set timeframe.

Strategic Planning and Project Development

- Rigorous analysis is required to 'make the case' and provide a basis for benchmarking, measuring progress, and communications .
- Tangible results, 'quick wins' and other confidence-building measures are essential to sustain motivation and secure ongoing commitment.
- Strategic planning and performance management must be timely, results-focused and constantly monitored; any deviations must be quickly noted and addressed.
- Action plans should take a step-by-step approach, focusing on measurable and attainable targets and milestones that will lead in a logical sequence to the overall objectives.
- Capacity-building activities should be sequenced and structured with on-the-job application of skills and knowledge. The gaps between delivery of related activities should be decided in consultation with the experts and Customs Directors. Customs Directors must also be encouraged to appoint the right people for training and to put their acquired skills to good use. The functional teams established in Customs should receive dedicated support in order to strengthen the institutional context.
- Enforcement (not strictly part of the *original* design but in practice combined with Risk Management) is essential for sustainable results. This requires broader cooperation frameworks (e.g., with police) and systems, as well as a

broader skills set (investigations, case-building, etc). Authorities are combining risk management and enforcement teams – or creating close synergies. Enforcement *per se* should be an integral part of any subsequent programme.

- Alignment of the Sida Columbus Project with trade negotiations (WTO, EU, etc.) and other Customs work is critical, to harmonise efforts and objectives and achieve cooperation among agencies and regional partners.
- The WCO should take advantage of synergies among the three regional components, creating greater opportunities for exchanges of experiences and emerging good practices.

Communications and Stakeholder Relationships

- Results-oriented, highly targeted communications and relationships management strategies will be essential for both SACU and the EAC in 2013 and beyond:
  - Overall Communications Strategy
  - Strategy to enhance Customs-Business relations on a permanent basis
  - Strategy to secure cooperation and coordination with other agencies for coordinated border management, single window and other TF objectives
  - Strategy for proactive donor coordination on a regional basis (WCO, regional Secretariats, SCs, donors to develop and implement)
  - Key messages on Customs' and Traders' rights and obligations, including messages/strategies related to women border traders.
- Targeted strategies are also required to address resistance to change. If resistance is not addressed at all levels, projects can fail. This should be a top priority for 2013 and beyond.
- Active support must be cultivated at senior decision-making and political levels to implement what has been agreed in a timely fashion. Revenue Authority/Customs Commissioners-General should have a clear role in customs modernisation and trade facilitation, nationally and regionally. (SACU is considering a regional 'Customs Forum' involving CGs. The WCO may be able to assist.)
- The WCO may wish to give thought to how it can use its high-level officials to advocate change and secure commitment from high-level Customs and political officials in the Sida Columbus Project countries. This is important in 2013, since the pilots and the post-pilot implementation phase will be challenging for Customs and traders alike, and vested interests will emerge to create obstacles at various levels.
- Relationships and expectations need to be managed proactively and constantly. Interviews indicated that Customs-Customs cooperation has improved considerably due to the frameworks and action plans resulting from the Columbus Project. However, Customs-Business and Customs-Other Agencies relationships need proactive work. This is an urgent issue that requires high-level action from early 2013.
- Effective cooperation requires much more than exchange of information. It requires systems, networks, constant effort, tangible results, good communications, and a sense of common purpose.

Financial Reporting

- It should be compatible with the general structure of WCO's accounting and reporting system (including the necessary audit trail).

- It should reflect the total budget over the whole agreement period and should be possible to break down (in the same structure) in annual work plans.
- It should be presented in a structure that facilitates both programme management and effective follow-up, although the level of detail could differ by management level. The structure should be compatible with the programme intervention logic (Logframe) and the Performance Measurement framework, so that financial data and programme data are presented in the same, programmatic structure.
- One purpose of this structure and level of aggregation is to facilitate analysis of the costs incurred for agreed activities or components, to monitor the results reported in the narrative report against plan, and to enable Sida to monitor the fulfilment of any agreed conditions.
- Annual financial reports should keep to this structure throughout the agreement period, and show accumulated expenditure per budget line as agreed with Sida (eg, total cost per component, and possibly also in the more detailed internal budget structure, with expenditure type per activity for RPMs/PMOs).
- Financial reports should cover all expenditure incurred by the programme in order to compare with reported results. If some of this expenditure was financed with non-Sida funds (e.g., WCO's or other donors' funds, interest, etc.) the additional income should be reported and any overhead proportionally distributed.

8.2 SPECIFIC RECOMMENDATIONS FOR SIDA

Both Sida and the WCO have learned valuable lessons in undertaking the Sida-funded Columbus Project in 2008 to 2012. The Review Team believes that if the Project progresses well in 2013 (i.e., the pilots and other activities listed in the Checklist below are implemented successfully), Sida should consider supporting the subsequent stage.

As noted in the Executive Summary, if Sida and the WCO wish to pursue a subsequent project for SACU and the EAC, it will be important to undertake a <u>new needs assessment</u> after the Preferred Trader/AEO pilots in 2013, and use that – and lessons learned from 2008-2012 – to design a well structured programme focused on practical activities and tangible results that will help the two regions achieve their objectives and foster coherent Eastern and Southern Africa (ESA) integration over 2014-2017. The 'desired outcomes' of the current Project would remain valid for another 3+2-year programme, but the specific objectives and activities would have to be recast to focus on practical ***implementation***, including <u>targeted national assistance</u> for weaker members, and national pilots where the results could be replicated regionally.

- <u>2013 will be an opportune time to conduct a thorough analysis</u> leading to <u>criteria and options</u> for deciding on whether and how to advance Sida's Columbus Project. As mentioned above and in the Checklist below, the next stage will have to focus strongly on consolidation of capacity and commitment in order to ensure sustainability of results. This will mean refining the capacity-building component accordingly (e.g., tailored assistance at the national level; continued regional iniatives; mentoring and on-call help desks to support implementation efforts, etc.).
- Any such analysis should explore how gains could be consolidated through <u>further regional cooperation initiatives</u> (e.g., improve the SACU model; eval-

uate EAC Secretariat capacity and willingness to cooperate; study other partnership options – e.g., ROCB, RTCs, TradeMark, etc.).

- If Sida decides to fund a subsequent stage, then it may wish to commission a comprehensive ‘pre-audit’ of the capacity of both the WCO and the programme management entities (be they REC Secretariats or other parties).
- It may be worthwhile to also consider simply funding specific activities that will produce a clear impact (e.g., risk management, coordinated border management, enforcement/preventative measures, women in border trade, supply chain security, etc.).
- Sida/WCO may wish to consider cooperation with TradeMark Southern Africa and TradeMark East Africa, as well as with Corridor managers, on relevant border development and women-in-trade issues. These types of projects tend to have a more clear-cut poverty-reduction orientation than Customs modernisation.
- Regarding ECOWAS, Sida may wish to commission a midterm review in late 2013 to determine if the component is proving to be an effective and efficient use of Swedish funding.

8.3 CHECKLIST FOR SIDA COLUMBUS PROJECT ACTION IN EARLY 2013

The items on this Checklist represent high-priority actions identified by Customs Directors and others relevant stakeholders involved in the SACU and EAC projects. Attaining the Project’s specific objectives for 2013 (e.g., successful pilots) will depend on timely and professional implementation of this action agenda. *The actions should not be postponed for a subsequent phase*; they are closely tied to **sustainability** of results. They will require additional WCO efforts and a more broadbased donor input.

For both the SACU and EAC components:

Interviews/analysis indicate that the **top priorities** for action in 2013 appear to be:

- Timely implementation and follow-up of the IT, PT and AEO pilots
- Intensified national- and regional-level support and mentoring for the dedicated teams working on AEO, audit, risk management, IT, enforcement/preventative measures, and Customs-Business relations.
- Securing ‘buy-in’ for Customs modernisation and trade facilitation, and strong commitment to action at all levels
- Communications and Stakeholder Relations Strategies and Action Plans (including tangible results and benefits to ‘sell’) – especially for Customs-Business and Customs-Other Agencies
- Updating and, where necessary, redesigning websites at SACU Secretariat and EAC PMO so that they contribute clearly and effectively to the objectives of the Sida Columbus Project
- Preparation of 5-year strategic plans (2014-2018) to guide the next phase of implementation of the SAFE Framework and RKC. This will require **post-pilot needs assessments**, rigorous analysis to set baselines and benchmarks, consultations, practical performance indicators, practical step-by-step activity plans, etc. Use the opportunity to brainstorm ‘*Customs in the 21st Century*’. With automation and trade facilitation initiatives, clearance will increasingly

move away from borders. This will have implications for skills development, customs and border infrastructure, border management, back-office conditions, stakeholder relations, etc.

- Effective coordination of the various donor and international organisation Customs/TF projects to underpin the 5-year plans.

Suggested Action in *Early* 2013:
The WCO should consider preparing, in consultation with SACU and EAC Steering Committee members, RPMs and NPMs *(commission professionals in strategic planning and strategic communications to assist)*:

1. Detailed checklist of what has been done to date and step-by-step checklist of what remains to be done to reach objectives of full regional compliance with SAFE and RKC
2. Detailed list of WCO role and activities in SACU and EAC during 2013
3. Terms of reference for **post-pilot** diagnostic and readiness assessments to determine baselines, needs, etc, for next 5 years (some work has been done by this and other projects; it all needs to be pulled together into one diagnostic report that will facilitate planning for the next stage: post-pilot implementation)
4. Analysis of costs and benefits for both traders and Customs/Revenue Authorities (focus on reduced costs/easier trade for business, increased revenues, greater efficiencies for Governments; operating implications for both). Deliver user-friendly analysis, modelling, baselines, benchmarks, results indicators. Use this analysis to secure 'buy-in' and stronger commitment among specific stakeholder groups and to underpin the Communications and Stakeholder Relations Strategies, and longer-term strategic planning.
5. With the help of external communications experts, RPMs, NPMs and Steering Committee Members, should create an overarching, comprehensive Communications Strategy, identifying target audiences, key issues and messages, and delivery mechanisms. Specific strategies are needed for each target group: Ministers, Commissioners General and their staff, Deputy Directors of Customs, general Customs staff, border station managers, border officers, traders, business associations, other agencies, donors, etc. Specific communications strategies are also required to deal with such issues as resistance to change, corruption, etc.
   - As part of a communications strategy, it will be important to determine how the Project can best serve its audiences through online services. The current websites are not being used to their full potential and are handicapped by out-of-date information and inconsistent terminology. It may be useful to commission a communications expert to develop options for a regional website strategy that would underpin the overall objective of Sida's Columbus Project (compliance with the SAFE Framework and RKC).
   - For optimum regional consistency and common understanding, it may be more efficient and effective to develop a *single* Project Communications Strategy and a common website/webpage design for the whole ESA region. As part of the Communications Strategy, RPMs and NPMs should determine exactly what sort of information is required on websites (e.g., legislation, roadmaps, rules, procedures, criteria, tools, checklists, sources of assistance, FAQs, hyperlinks, etc.). (Given the short-term nature of

ECOWAS activities, a dedicated website for that component may not be cost-efficient.)
- Given the issues mentioned under visibility, Sida and the WCO should decide what name the Strategy and Websites should bear, to avoid further confusion. For sustainability, the name should probably represent future goals (eg, ESA RKC and SAFE Compliance Website).

6. Strategy to enhance Customs-Business relations on a permanent basis
7. Strategy to secure cooperation and coordination with other agencies for coordinated border management, single window, and other trade facilitation objectives
8. Strategy for proactive donor coordination on a regional basis (WCO, regional Secretariats, SCs, donors to develop and implement. (A regional donor plan was mentioned as a deliverable of the WCO Mauritius meeting in March 2012, but the Reviewer was not able to find it.)

Suggestions for later in 2013, as part of strategic planning for any next phase:
Consider incorporating into any subsequent activities or programmes the following (requested by numerous Customs and business representatives during interviews):

9. Analysis on how to extend PT/AEO to SMEs and microtraders, especially women border traders
10. Capacity-building on valuation, rules of origin and classifications (coordinate donors, involve both Customs and traders in capacity-building activities)
11. Capacity-building on supply chain security (involve both customs and companies, including consolidators, forwarders and clearing agents)
12. Certify regional management consultants to help companies become AEO-ready (this may exist in S. Africa or Kenya already; train-the-trainer programmes may be the most effective).

SACU-specific suggestions:

1. SACU's WCO Customs Development Programme 2013 Action Plan is good in principle. It covers all the right things for this stage of the project and the lead-up/implementation of Preferred Trader and IT Connectivity Pilots. However, in January 2013 it should be set out in detail, in consultation with SC members and NPMs. Spell out in chronological order and in detail the proposed activities, dates, responsibilities, participants, budgets, etc.
2. The WCO and SACU, as per the SACU Secretariat's suggestion, may wish to prepare a WCO-SACU 2013 Performance Plan/Agreement, incorporating the (detailed version) Project Action Plan, the action points from the November SC Meeting and relevant points from this Evaluation. Spell out the respective roles of the Project team and the WCO in progressing the pilots. Assign responsibility for tasks related to planning for next stages. Create practical, easy to monitor and measure performance indicators.
3. The WCO and SACU Secrerariat, with the Steering Committee, may wish to start preparing to develop a comprehensive 5-year Regional Action Plan, based on the analysis, needs assessment and existing National Action Plans.
4. The SACU Programme Management team should redesign and update the relevant SACU Secretariat webpage and encourage the Secretariat to facilitate navigation so that relevant documents are easily retrievable.
5. The WCO may wish to offer the Project's support to help set up a regional Customs-Business Forum under the SACU Secretariat that could serve as an

umbrella group and 'cascade down to national fora'. *"This will be the most beneficial because it would have a clear mandate, division of labour, private sector representation, and seek practical outcomes."* (Director, Namibia Logistics Association)

6. The SACU Project officers and WCO may wish to explore how to further engage with the SADC Secretariat through partnerships, information sharing, etc.
7. The WCO and the relevant SACU Programme management officers should start planning for the administrative phase-out of the current Sida-funded Project.

EAC-specific suggestions:

1. The EAC PMO, with WCO help, should prepare a detailed EAC Action Plan for 2013 (AEO pilot stage) in consultation with SC members and NPMs. Spell out in chronological order and in detail the proposed activities, dates, responsibilities, participants, budgets, etc.
2. The WCO may wish to consult (in January 2013) EAC Steering Committee members on role for RPM during 2013
3. The WCO may wish to prepare with the Regional Project Manager and Office Assistant detailed performance plans for 2013 with clear weekly and monthly responsibilities and performance indicators. (*Would not recommend spending a lot of time and money on upgrading the RPM's project management skills since the PMO and RPM are unlikely to be there after yearend. Better to use the funds for the activities*.)
4. The WCO, with the PMO, may wish to set up SC Working Group in early 2013 to consider the way forward after the AEO pilot
5. The WCO may wish to commission a study to develop options on how to structure possible Sida-WCO assistance in the next stage (implementation of regional AEO and compliance with SAFE and RKC)
6. The SC, WCO and EAC Secretariat may wish to analyse potential role of EAC Secretariat as a harmonising and coordinating force in the region (to support next stages – e.g., full regional AEO and Tripartite integration).
7. The WCO and EAC PMO should start planning for administrative phase-out from the third quarter 2013.

For the ECOWAS component:

The WCO may wish to commission analysis to develop 2012 baselines and clear performance indicators to monitor progress and refine service delivery in the short period to December 2014. It may also wish to commission in-depth analysis on how capacity building can address the current national realities that are impeding the ECOWAS countries from meeting Customs objectives.

Lessons learned in the overall Sida-funded Columbus Project also suggest that the WCO may wish to consider adding the following capacity-building themes to the existing three, should the analysis indicate that this is warranted (some aspects have been covered in the workshops):

- Issues and Risk Management
- Managing Communications and Visibility
- Managing Crosscutting Issues

The gender imbalance in ECOWAS activities should be addressed where possible.

9 GAPIN Project: Brief Background

In August 2010, the World Customs Organization (WCO) submitted a proposal for the *GAPIN Project* to the Division for International Trade Policy within Sweden's Ministry for Foreign Affairs (MFA). The project proposal covered a period of four months (September-December 2010) with a total budget of €200,000 (some SEK 1,8 million). The name *GAPIN* reflected the project's objective of fighting illegal wildlife trade in and out of Africa, concentrating on Great Apes and emphasising Integrity (anti-corruption) in Customs.[16]

The proposal had been elaborated in response to an idea presented to the WCO by the Swedish MFA shortly before. The interest from the Swedish Government was the successful result of advocacy from a Swedish wildlife activist living in Africa who, for some time already, had tried to convince EU politicians about the increasing threats to the Great Apes and the need for rapid and effective measures.

The Swedish Minister for Trade considered the theme to be of political interest and relevant to trade policy issues. Here, the WCO could play an important role, not least concerning capacity building for the enforcement of the international convention, CITES,[17] which prohibited unregulated trade in endangered species, such as the Great Apes and other wildlife. The project proposal was promptly approved by MFA that same month of August 2010. It was very brief (content-wise less than 10 pages) and did not include a Logical Framework or indicators concerning performance measurement (not required by the MFA).

The overriding goal of this first GAPIN Project, was to *Combat the illegal trade in wildlife – particularly concerning Great Apes - in 15 African countries.* The more specific project objectives were as follows:

- Build capacity among Customs officers for enforcing CITES at the borders
- Prevent, investigate and repress illegal trade in protected wildlife
- Promote communication and cooperation among the participating countries;
- Raise awareness among Customs officers in the area of wildlife enforcement;
- Gain insights of the trends of illegal trade of certain species in the selected countries
- Enhance integrity in Customs in relation to wildlife enforcement.[18]

[16] Great Apes = the biological family *Hominidae*, comprised by bonobos, chimpanzees, gorillas, and orangutans.
[17] CITES = Convention of International Trade in Endangered Species of Wild Fauna and Flora, an international agreement in force since 1975, currently signed by more than 175 countries. Its Secretariat is located in Geneva.
[18] GAPIN Project – WCO Business Case, p.6. (WCO, 2010) and GAPIN Final Report, p. 5 (WCO, May

These objectives were to be achieved through two training workshops and one joint border operation (with several countries participating simultaneously), followed by a debriefing event to take stock of the experience, and make recommendations ahead. The brief Project Document also included hopes for a continuation, which would "help the countries build up stronger enforcement and integrity capacity, via a series of systematic approaches".[19]

Once the project proposal had been approved by the MFA, the WCO Secretariat contacted the Directors General of Customs in each of the 15 countries that had been selected, inviting them to participate.[20] Only one country – Mali – did not respond. Thus, the GAPIN Project came to involve a group of 14 African countries.[21]

The final report on GAPIN I was submitted in May 2011, covering activities during September 2010 to the end of March 2011. The total expenditure amounted to some €127,000, or 64% of budgeted funds.[22]

Notwithstanding its very short duration, Project GAPIN was perceived as a success. In most Customs administrations involved, the project seemed to have generated substantial interest and was also reported to have improved levels of cooperation between customs in neighbouring countries. Moreover, the joint border control operation, which was implemented during a period of two weeks in January/February 2011, achieved some interesting results. The operation involved 14 African countries, supported by the Customs of 22 transit and destination countries in the Middle East, Asia and Europe and lead to almost 100 seizures (mainly outside Africa) of CITES-regulated species, including a certain amount of ivory and rhinoceros horns.[23] Corruption and attempts at corruption reported during the operation seemed to confirm the importance of integrity issues.

The perception of GAPIN as having been successful, together with continued interest from the MFA, soon generated a proposal from the WCO for a second phase of the project. This proposal, called GAPIN II, was to cover a period of 12 months (Jan-Dec 2012), with a budget of SEK 4.25 Million. According to the WCO, the design incorporated lessons learned from the first GAPIN project, such as improved communication with civil society organisations. Moreover, the scope of animal species was now officially broadened; apart from the illegal trade in Great Apes, the project would also

2011).

[19] Ibid, p. 11.

[20] Country selection appears to have been decided by the Swedish MFA.

[21] The group consisted of the following countries: Botswana, Burkina Faso, Cameroon, Ethiopia, Egypt, Kenya, Mozambique, Namibia, Nigeria, Rwanda, South Africa, Tanzania, Uganda and Zambia. Except for Cameroon and Nigeria (which were added by WCO), the selection of countries had been indicated by the Swedish MFA.

[22] The major part of these funds, some 90%, was spent on the training and follow-up events which were organised by the project (one workshop and one debriefing conference).

[23] No Great Apes were seized.

target elephants (ivory), rhinoceros (horn), pangolins and other threatened species.[24] In spite of this change, the name was still maintained – as GAPIN was considered a brand name.

Furthermore, the geographical coverage of the second phase of the GAPIN Project was expanded. In order to comprise more countries of origin and transit in Africa for Great Apes, also the Democratic Republic of Congo, the Central African Republic, Gabon, Guinea and Zimbabwe were included. Destination countries outside Africa – mainly in the Middle East, Asia and Europe – could not be included as project beneficiaries, but were to be invited for intensified participation given their vital role in the border operations, as well as in capacity building within the WCO global partnership.

The new project, GAPIN II, was approved by the Swedish MFA in November 2011, applying the same formal procedures as for GAPIN I, except that funds this time were to be disbursed by Sida. The final project report and any remaining funds are to be delivered to Sida by March 2013. As for the first GAPIN project, also the document for this second project was very brief and did not include a Logical Framework Approach (LFA) or other results framework specifying indicators concerning performance measurement. Eight objectives were defined at "the strategic level":[25]

- Build up enforcement capacities of Customs, in particular frontline officers
- Continuous awareness-building on integrity issues
- Enhance risk management and detection, investigation and prosecution capabilities of Customs
- Improve existing communication and cooperation amongst involved partners
- Raise public awareness on the role of Customs and other relevant law enforcement agencies in the area of wildlife enforcement
- Raise public awareness regarding ill-conceived myths on the medical value of certain wildlife products (i.e., rhinoceros horn)
- Promote cooperation among relevant national, regional and international environmental bodies
- Identify new threats.

At the operational level, four project objectives were defined:

- Detect, intercept and seize illegal wildlife shipments
- Improve operational cooperation between Customs and relevant environmental agencies and police
- Create conditions for proper follow-up actions (e.g., controlled deliveries)
- Prevent corrupt behaviour and take appropriate measures

[24] **Pangolins** are mammals covered in tough, overlapping scales, which give them a very characteristic appearance, often compared to a "walking pine cone". Different pangolin species can be found across Asia and sub-Saharan Africa. Habitat loss (deforestation) and poaching for illegal wildlife trade have made them one of the most endangered groups of mammals in the world. They are eaten in many parts of Africa and are in great demand also in certain parts of Asia, because of their meat but also the belief that their scales have medical qualities.

[25] Project GAPIN II, WCO Business Case, p. 8-10. (WCO, 2011)

These goals were to be achieved through the following key activities:

- Establish a communication network for participants to exchange information
- Training workshops for frontline customs officers at maritime ports and air-ports
- Conduction of a joint operation, preceded by a training session in Africa and followed by a debriefing session in Asia, where main destination countries are located
- Appoint "GAPIN Ambassadors" with the task of promoting the project within Customs and civil society at national and regional levels
- Undertake a communication campaign.

10 GAPIN Project: Ownership, Relevance and Harmonisation

10.1 STAKEHOLDER RELATIONS AND OWNERSHIP

The GAPIN Project was initiated due to a direct political interest from the Swedish Government. Sweden had become concerned about the threats of extinction of the Great Apes and wanted to support an effective and visible effort against illegal trafficking of these species. It was in this context that the WCO – which already was receiving Swedish support for capacity building for national Customs agencies in many African countries – was contacted and agreed to elaborate a project proposal along the lines of the interest expressed by the Swedish MFA. Once the project had been approved, WCO sent an invitation to the Directors General of the National Customs Administrations in the 15 African countries which had been selected, to participate in the project.

Against this background, it would be difficult not to conclude that, during the design and starting-up of the project, ownership was located outside the group of the 15 countries which subsequently were invited to participate. Furthermore, considering *(i)* the short lifetime of the project (less than 6 months); *(ii)* the character of its main activities (a few short events rather than dense processes with a continuous presence), and; *(iii)* its enormous geographical scope (14 countries located all over the African continent), the situation concerning the project's ownership is not likely to have changed considerably during implementation.

Concerning the theme of *stakeholder relations,* there is ample evidence of considerable involvement from national customs officers during the project's lifetime. However, involvement from the local/national business community (or relevant national NGOs) seems rarely to have been sought for or achieved. Involvement from officials directly taking part in the project activities was high, whereas interest from the Directors General frequently was perceived as not sufficiently firm.[26]

During the elaboration of GAPIN II, selected stakeholders and organisations who had shown interest and commitment during the preceding phase were consulted, but the main design of the project was done by the WCO. No participatory in situ analysis of the problems and their variation from one country or region to another was undertak-

[26] *"We still need them to become more convinced about the importance of these themes"* was a rather frequent comment in this context among key persons interviewed by the Review Team.

en; a method which in other contexts has shown to be a powerful tool for the generation of firm and mutual commitments.

During the second phase of the project, earlier participants were appointed as National Contact Persons, which generated both continuity and a kind of group identity, with the GAPIN themes (combatting wildlife trafficking and enhancing integrity) as the defining elements.

Ownership was thus no longer entirely external, and was perceived by the majority of the interviewees as being shared between the WCO and the national customs – sometimes also with "Sweden" appearing as a third reference in this context. Within the group of professionals directly involved in the project, a sense of co-ownership appears to have been created. *"We are the GAPIN Family"*, was the expression used by a high-ranking WCO officer at the closing of the final project event in Lusaka in December 2012; an expression applauded by the participants.

However, according to the information obtained by the Review Team, active participation from the higher echelons and key decision makers within the national Customs Administrations has been limited during the second phase of GAPIN, and the need felt by officers at the operational level to *"really convince our top management and Director Generals about the importance of the wildlife theme"* was often mentioned. Thus, ownership and involvement in institutional terms remains weak.

10.2 RELEVANCE OF OBJECTIVES AND THE PLAUSIBILITY OF THEORY OF CHANGE

10.2.1 Overall contextual relevance

In the late spring of 2010, when the Swedish Government contacted WCO and informed them about its interest to fund a special initiative for fighting illegal wildlife trade (focussing on Great Apes), information on the magnitude and character of transborder trade and transiting specifically concerning these species was still somewhat limited but had already been collected and analysed for several years. At the CITES Secretariat, a Task Force for Great Apes had existed at least since 2004/2005, and in March 2010, the UNEP-UNESCO funded programme Great Apes Survival Partnership (GRASP) published the first analytic summary so far concerning the critical situation for the gorillas in the Congo Basin.[27]

Among the specific recommendations for action made in this publication, increased collaboration among international and national actors for enhanced enforcement regarding illegal trade in wildlife was emphasised. In addition to WCO, the

[27] *The Last Stand of the Gorilla. Environmental crime and conflict in the Congo Basin. A rapid response assessment.* (UNEP/GRASP, 2010)

International Police Organisation (Interpol) and UNODC[28] were mentioned in this context.[29]

The major threats identified concerning Great Apes and their survival were not linked to international trafficking but rather to *(i)* destruction of their *habitat* (mainly through large-scale logging and agricultural expansion); *(ii)* diseases (such as the Ebola fever), and; *(iii)* increased use of meat from wild animals for human consumption (so-called *bushmeat*), to some extent including meat from slaughtered Great Apes.[30]

Illegal trafficking in Great Apes was also mentioned as a factor, as these species were being sold and shipped abroad, mainly to zoos and amusement parks or to wealthy people who wanted them as luxury pets. Whereas the quantity of Great Apes exported was estimated to be very small in relation to the toll taken by other threats, it was pointed out that for each live ape that was illegally traded abroad, a much greater number (between 10 and 50) had generally been killed or died during the hunt and in captivity.[31] Finally, as these species already were suffering a rapidly increasing rate of decimation, the loss corresponding to illegal trade was of greater importance than what the sheer numbers may have reflected.

Moreover, several reports during this same period also indicated what seemed to constitute a dramatic increase concerning other wildlife crimes in Africa, particularly regarding illegal hunting (poaching) of elephants and rhinoceros. Illegal trade in ivory and rhino horn was at an all-time high and continued to increase, mainly driven by a very strong demand from Asian countries with prices comparable to those of precious metals.

In sum, at the time there was ample evidence concerning a substantial increase in wildlife crime in Africa. These crimes were driving some species to the brink of extinction, destroying important natural wealth and negatively affecting income possibilities for the rural population and for national development opportunities (such as nature-based tourism). It also promoted corruption (not least at the borders) and – due to the increasing involvement from organised crime – could imply security concerns for national governments.

Consequently, in broad contextual terms, efforts aimed at combatting wildlife trafficking should be judged to possess high relevance, both from an environmental and national development point of view. Furthermore, in this context Customs were no doubt important actors, considering their role concerning border and trade control.

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[28] UN Office for Drugs and Crime.
[29] *The Last Stand of the Gorilla, p.8.*
[30] The ongoing wars – with substantial quantities of armed groups and internal refugees living in hitherto unpopulated areas – constituted one of the main drivers behind the increase in bushmeat consumption.
[31] *The Last Stand of the Gorilla, p.54.*

10.2.2 Relevance in relation to Swedish goals for international cooperation

Swedish strategies for international development cooperation with sub-Saharan Africa were renewed during the period comprised by the two GAPIN Projects. However, the changes undertaken were only minor when it comes to the theme addressed (wildlife crimes) and its wider context. Crossborder challenges in the areas of stability, trade, economic integration and efforts for sustainable development (including natural resources and ecosystems) were continuously given high priority for Swedish development.

The assessments undertaken by MFA concerning each of the two phases of the GAPIN Project thus rightly made reference to these priority themes, as well as to the fact that the project also would contribute to the fight against corruption (governance and security). Finally, the assessments also emphasised a criteria proper to the MFA, namely the fact that the GAPIN initiative had been given "high political priority" and therefore was in accordance with the MFAs guidelines concerning "support which transmits political messages".[32]

10.2.3 Relevance of the project goals and plausibility of the theory of change

Whereas the overriding goal of both phases of the GAPIN Project – *Combat illegal trade in wildlife, particularly concerning Great Apes* - is perfectly relevant, the scrutiny of the different specific project objectives causes concern. Firstly, most of these objectives are stated in very general or vague terms, without any link to performance indicators. Secondly, some of them are obviously far beyond the sphere of influence of the national Customs Administrations – such as the goal related to raising "public awareness regarding myths on the medical value of rhinoceros horn". However, the main concern here is the lack of analysis preceding the formulation of these specific objectives; an analysis which should define strategic entry points for Customs Administrations in this context and sustain the plausibility of the selected specific objectives as effective and efficient vehicles for making progress in relation to the overriding goal.

Even without the presence of any explicit analysis or argumentation, it may be concluded that the specific objectives taken together reflect the view that the best way of combatting wildlife trafficking through Customs is to apply the CITES Convention and that the deficiencies hitherto in enforcement of this convention in Africa are mainly due to lack of knowledge, know-how and awareness within Customs, in combination with a certain degree of corruption (or lack of integrity) – a situation which can best be alleviated concentrating on training and awareness raising among front-line officers.[33]

Nothing is said about the root causes for the situation up to present time - with enforcement of CITES having had very limited coverage and effectiveness in the select-

[32] Quotations (translated from the MFA's assessment documents).
[33] Customs officers at the border crossings (in this context mainly the airports and maritime ports).

ed African countries so far. Why has enforcement of CITES not been a priority, what are the institutional dynamics and other incentive structures that have been reproducing this situation – and how could a transformation become viable, with what kind of strategy, entry points and mechanisms? What are the principal characteristics and the magnitude of corruption in this context?

On these fundamental topics, the project documentation provides little clarification. The contents of the specific objectives convey the message that the current lack of enforcement capacity can be constructively viewed as an awareness problem; and that the magnitude and principal features of corruption still can be handled through awareness raising among frontline officers. Considering current contextual knowledge, this review judges that these assumptions are not plausible.

Summing up, the theory of change which can be discerned through the selection of specific project objectives is unconvincing, which also implies that the relevance of the specific objectives for achieving the overriding goal appears to be low.

10.3 HARMONISATION

The aspect of harmonisation in this context should ideally refer to two different fields or areas of alignment and coordination. Firstly, relations between the GAPIN Project and other transnational initiatives related to fighting wildlife trafficking in Africa. Secondly, relations between the GAPIN activities and efforts planned and undertaken by different national authorities with mandates within relevant areas.

Regarding the international level, a considerable degree of exchange and coordination seems to have existed, particularly in relation to actors such as CITES, Wildlife Trade Monitoring Network (TRAFFIC), UNODC, Interpol and GRASP.[34] However, drawing on inputs from document screening and comments from interviewees, it seems fair to conclude that harmonisation has been rather limited when it comes to national authorities dealing with the environment and wildlife management, on one hand, as well with the national police and judicial agencies, on the other.

[34] All of these organizations had working relations since earlier with the WCO. To this group should also be added the International Consortium on Combating Wildlife Crime (ICCWC), which started its work in early 2011, comprised by INTERPOL, UNODC, WCO, the World Bank and CITES.

11 GAPIN Project: Quality and Coherence of Project Design

11.1 GENERAL CHARACTERISTICS OF THE PROJECT DESIGN

The project proposal for GAPIN I (with a planned duration of 4 months and a budget of € 200,000) was elaborated during a short period of time, had more the character of an outline than a final project document and was very brief; in terms of contents it comprised less than 10 pages. The proposal for the second phase (with a planned duration of 12 months and a budget of € 490,000) generally shared these same characteristics. (In terms of content, it was even shorter than the proposal for GAPIN I.)

Neither of the two proposals contained the conventional elements of resuts-based development project design, such as baseline data, a Logical Framework Matrix (or a comparable approach with the same basic purposes) or criteria for how to measure performance. These elements were not required by the Swedish MFA and did not correspond to the WCO routine approach.

These design characteristics complicate the task of evaluating the projects in question. However, a more important shortcoming of the project documents, was the lack of contextualisation, with considerable impact regarding prospects for effectiveness and efficiency of the activities undertaken. Lack of contextualisation makes it difficult to assess the expected sphere of influence of the project. This aspect merits some further explanation and examples.

11.2 SOME IMPLICATIONS RESULTING FROM THE LACK OF CONTEXTUALISATION

11.2.1 Institutional core dynamics: Revenue collection vs. control tasks

In many African countries – and particularly in sub-Saharan Africa – the National Customs Administration often represents the most important contributor of taxes collected to the Government, with trade taxes accounting for 25 to 50 per cent of all taxes collected in the respective country.[35] This implies that the main role of the National Customs Administration is to be an efficient revenue collector, which also is the reason why Customs often belong to the National Revenue Authority. The centrality of

[35] In general terms, this situation is mostly related to the weaknesses and narrow coverage of national taxation systems.

the revenue task is generally reflected in the Customs Mission Statement. One example of this is in Kenya, where this aspect is expressed as follows:

> *"The primary function of the [Customs Service] Department is to collect and account for import duty and VAT on imports."*[36]

Generally, an official annual target is set for the collection of taxes to be achieved by the National Customs Administration, which then may be broken down into targets for every major port and border crossing. Responsibility for complying with these targets lies with the local commander, who may even set performance targets for each customs officer. Furthermore, as trade taxes are collected on imports only, it automatically reduces attention given to goods in transit and goods being exported to a neighbouring country.

In other words, control concerning wildlife trafficking – which always is in transit or exported – is at the outset not likely to be a theme of priority within the normal routines which are reproduced by the institutional dynamics within Customs. True, most national customs also have the recognised function of "securing legitimate trade" and "protecting society from illegal entry and exit of prohibited goods", but these tasks are given substantially less priority than revenue collection – which usually is the most prominent result exposed in the Annual Reports from the National Customs Administrations.[37]

The predominance of the revenue collection goal for setting priorities and conditioning daily work at the border was emphasised to the Review Team by frontline officers who had a very positive attitude concerning GAPIN but were concerned regarding how to "make it fit". As one frontline officer with long experience expressed it:

> *"If you make an interesting seizure of wildlife you may be praised, but if you dedicate too much time to these tasks and generate less revenue then you are at risk, your supervisor will be pressing you all the time. You may even be told he'd like to relocate you."*

These conditions are obviously well-known to an organisation such as the WCO, which has also been active in promoting compliance of other functions for national customs. However, this context of institutional dynamics and incentives is not addressed in the GAPIN project documents and cannot be noted in the design, implying a risk for reduced effectiveness of the activities undertaken as well as less prospects for achieving sustainability.

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[36] http://www.kra.go.ke/index.php/customs-services/about-customs

[37] See, for instance, the Kenya Revenue Authority Annual Report for 2010 (p. 5-6) where Customs result in relation to the set target is reported to have been 96% - which is labeled a "revenue underperformance". (http://www.kra.go.ke/index.php/publications/kra-financia-statement)

11.2.2 What is the type and strength of forces which the Project may confront?

According to recent reports on this subject – from wildlife organisations as well as from law enforcing institutions - wildlife trafficking is today an extremely lucrative business, representing product values and a total turnover which make it one of the largest global trade in illicit goods (after drugs and human trafficking). Moreover, due to its size and profitability, wildlife trafficking has become increasingly controlled by international criminal networks, mainly driven by increasing demand in Asia. In Africa, the hunting of elephants and rhinoceros has been undergoing a dramatic change, with small-scale poachers being replaced by heavily armed groups – which often are related to the ongoing wars and rebellions and use wildlife trafficking as a means of financing their continued activities. These changes apply for ivory and rhino horns, whereas they seem to hold less relevance for trafficking in Great Apes.

As both unit prices and volumes increase, the relative power of corruption mechanisms (and their extended networks, embracing private business as well as all levels of public institutions and Government) is likely to be increased. What would the strategic niche be of a (small) project like GAPIN – which explicitly sets out to combat wildlife trafficking through enhanced enforcement capacity and integrity at Customs – in this context? The project documents do not appear to take into account the magnitude of these contextual challenges, other than providing activities related to training, particularly targeting frontline officers.

Methods for mobilising institutions as a whole (beyond the individual frontline officers), would require entry points or criteria concerning what other alliances to reach out for and to be built; between the Customs and the environmental authorities, the wildlife services, the police, the judiciary, etc. Such entry points and criteria are not apparent in GAPIN.

Developing close collaboration with authorities within these latter fields would seem to be of crucial importance when it comes to effective enforcement; seizures at customs according to an international convention such as CITES should not be confounded with actual law enforcement.[38]

Concerning national authorities entrusted with varying responsibilities within the areas of environmental protection and wildlife, they are likely to be useful both for knowledge and prevention purposes, as well as taking care of live animals seized by Customs – like young Great Apes, who could not be kept in any storage room at the

[38] For effective enforcement, the seizure at Customs should be followed by investigation, prosecution and tribunal's judgement; an often complicated process involving several different authorities. Moreover, the CITES Convention itself does not establish penalties, these are defined in the national law and thus varies considerably between the countries. In this context it should also be mentioned that the project does not possess any updated compilation concerning *(a)* the different mandates of authorities in each country to be involved in such a judicial process; *(b)* the existing laws and established penalties in this context, and; *(c)* the application so far of existing legislation for wildlife crime, per country.

border crossing and who, in order to survive, very soon would have to be placed in some kind of wildlife sanctuary.

11.2.3 Country selection, main goals and project size

GAPIN came into being as an initiative for contributing to combat trafficking of Great Apes in particular. However, the group of 15 African countries selected for the first phase of the project does not coincide with the countries considered to be of principal importance regarding the origin and transiting of Great Apes on the African continent.According to wildlife trafficking specialists, the principal countries regarding the origin of Great Apes and common transit routes hitherto in Africa are: Democratic Republic of Congo, Cameroon, Congo, Ivory Coast, Guinea, Central African Republic (origin), and Egypt, Sudan and Libya (transit).[39] However, the countries selected for GAPIN I were: Botswana, Burkina Faso, Cameroon, Ethiopia, Egypt, Kenya, Mali, Mozambique, Namibia, Nigeria, Rwanda, South Africa, Tanzania, Uganda and Zambia.

Concerning the principal countries of origin for the targeted Great Apes, thus only one (Cameroon) out of six countries was included in the first phase of the GAPIN Project. For the second phase of the Project, three more countries belonging to the category of “principal origin countries” for Great Apes were added (DR Congo, the Central African Republic and Guinea). By that time, however, the scope of animal species to be addressed by the Project had been officially broadened; apart from the illegal trade in Great Apes, the project would also target elephants (ivory), rhinoceros (horn), pangolin and other threatened species. Even if Great Apes were still explicitly mentioned, they no longer constituted the main focus.

A final comment in this context relates to the viability of a project goal which combines emphasis on Great Apes together with ivory and rhino horn. If inspection at Customs becomes more frequent concerning transit and exports, it obviously implies that a variety of different illegal products may be discovered and can be seized.[40] However, this can be treated as a “positive side-effect” and does not necessarily mean that the activities undertaken before the seizures (networking, selective information gathering, intelligence work, etc.) should focus on Great Apes as well as on ivory and rhino horn. This aspect has been mentioned to the Review Team by several well-informed analysts within this field and relates to the fact that there is a dramatic difference in the character today of the trafficking of (live) Great Apes, on the one hand, and the illegal business concerning ivory and rhino horn on the other – with the latter presenting a degree of violence, profit and organisation which makes it very

[39] Country composition confirmed to the Review Team by representatives of GRASP/UNEP (Great Apes Survival Partnership) in Nairobi.

[40] Which, for instance, was convincingly shown in the two special border control operations undertaken within the GAPIN project, where many different wildlife items as well as several other illegal products (including gold, drugs and cigarettes) were seized.

akin to the drug-trade. Particularly within a project of such a reduced size as GAPIN, this concern – related to viability – seems clearly legitimate.

11.3 PROJECT SCOPE AND SCALE

As described above, the scope of the goals in GAPIN I and GAPIN II are very ambitious. At the same time, the project design reflects several incongruences and a fails to acknowledge key features of the context specific realities where the activities are to be performed, implying negative consequences for the prospects of achieving the expected results.

Another critical point in the project design concerns the relation between the results to be achieved and the means defined for this purpose. All in all, the GAPIN Projects have had a maximum budget of some € 700,000, and were supposed to cover or at least actively involve authorities within 20 countries located all over the African continent (plus a number of Customs administrations within transit and destination countries in other continents) – all within a time span of less than 18 months. Moreover, the main instruments for achieving the expected results were to be five or six training workshop (with a limited number of participants), two joint border operations, some internal promotional activities and certain activities within the field of communication.

The specific objectives (or results) were not defined in a precise manner or linked to any performance criteria but were formulated in a rather general manner, such as ”capacity building among customs officers for enforcing CITES at the borders”, ”prevent corrupt behaviour and take appropriate measures”, and ”enhance investigation and prosecution capabilities of Customs”. However, even with this reservation concerning the precise contents to be ascribed to the objectives and results officially established, there is a serious mismatch between even these vague goals and results on one hand and the resources and time-frame of the GAPIN Projects on the other.

The goals can be interpreted more as an expression of interest and as areas where progress was deemed necessary for enhancing wildlife trafficking – which now would be corroborated by a campaign (i.e., a project) which facilitated visibility and transmitted political messages. However, these were not the terms in which the project proposals were presented and officially assessed. And even within such an interpretation, most of the concerns exposed above would remain relevant.

12 GAPIN Project: Implementation and Management

12.1 REVIEWING THE PROJECT

12.1.1 GAPIN I

This project was approved for financing by the Swedish Government in August, 2010 and in terms of activities covered the period from October 2010 to the end of March 2011. Most activities performed were related to the following three major events:

i. A capacity building workshop on the CITES Convention, skills and techniques for its implementation and how to enhance integrity (Kenya, December 2010). This workshop was attended by two Customs officers from each of the 14 African countries involved in the Project.[41]

ii. A joint border operation undertaken during two weeks in January/February 2011, involving 14 African countries and supported by the Customs in more than 20 transit and destination countries in other continents.

iii. A debriefing session, following the border operation (South Africa, March, 2011). Here, results from the Operation were analysed and lessons learnt identified. Ideas for "the way forward" were also discussed.

The "communication campaign" mentioned in the project proposal, was also carried out but was limited to the production of a small range of information materials. Thus, a poster on Great Apes was produced, to be placed in the Customs Area at different border crossings and ports, as well as a set of Identity Cards which could help customs officers to recognise the different kinds of Great Apes (with photos and detailed descriptions). Following the joint border operation, a press release was produced by the WCO Secretariat, and a press conference was held at the inauguration of the debriefing session.

The official Final Report from GAPIN I reflects a considerable degree of satisfaction and enthusiasm regarding what was achieved during this short period. It also contains some interesting points concerning challenges to be addressed in the future, such as the following:

1. It took some time to convince Directors General to allocate staff to travel to the workshop and also to allocate extra staff to support the joint border operation. Director Generals are now sensitised but as DGs change frequently in Africa there might be a need to spark their interest again in the issue of CITES.

[41] According to the project proposal, two such capacity building or training workshops were initially planned.

2. In relation to the results from the joint operation, the participants at the de-briefing session concluded that the countries chosen were not necessarily those with the biggest population of Great Apes.
3. Participating countries also identified a need to look into the organisational structures and strategic development plans of Customs administrations and see how CITES enforcement and integrity issues are dealt with.[42]

In sum-up, the Report states that "*Project GAPIN has met its objectives*" and continues: *"Customs capacities in the field of CITES were built and integrity was fully recognized as part of the process. (...) Through the Operation it was possible to prevent and repress illegal trade in protected wildlife. (...) The success of Project GAPIN confirms the validity of the WCO CITES enforcement programme and is part of a process that should not end with a Project. (...) A longer term Project, based on the experiences and lessons learnt from Project GAPIN could help Customs administrations to enhance their enforcement capabilities and reflect on what needs to be done to improve integrity."*[43]

Comparing the established objectives for the project with the activities carried out, the evaluation team does not agree with this assessment. However, if the first GAPIN Project is not seen as a real project but rather as more of a campaign, and if the categoric language utilised in the WCO Report (*capacity was built*, *integrity fully recognised, illegal trade was prevented and repressed, etc.*) is not taken literally – then it may well be correct that the GAPIN effort did stimulate interest and contributed to some aspects within the field of combatting illegal wildlife trade.

12.1.2 GAPIN Phase II

The second phase of the project was approved for financing by the Swedish Government in November 2011, with planned activities starting in January 2012 and to be finished by the end of December.[44] Most of the project activities followed a model similar to the first phase:

i. Three capacity-building and training workshops; two for frontline Customs officers at airports (held in Zurich and Brussels, respectively) and one for Customs officers at seaports (held in Durban)
ii. One seminar (held in Kampala) preparing for the next joint border Operation
iii. A joint border Operation during 10 days in October, 2012, involving efforts from more than 40 Customs administrations in Africa, Asia and Europe
iv. A debriefing session (held in Lusaka) at the beginning of December 2012, which also served as a closing session for the GAPIN II, with some proposals concerning the future.

[42] GAPIN Project, Final Report; p. 11-13 (WCO, 2011).
[43] Ibid, p. 13-14.
[44] No official progress report exists for this period, as it has covered 12 months only. The final report (including the financial part) is to be submitted to Sida by March 2013.

Apart from these events, the project document for this second phase also contained systematic activities related to targeted promotion of the project goals and "the definition and implementation of a communication campaign".

The targeted promotion was carried out by three experienced Customs officers (two from the English speaking country group and the other from the French speaking group) selected by the WCO to become what was called *GAPIN Ambassadors*. Their main task was to visit Customs administrations in the involved countries, give motivational speeches on CITES and wildlife trafficking, inform about the project, exchange information and stimulate to active participation, including through contact with the higher management levels. While they were still paid by their respective national employers (the Customs administrations in Kenya, Nigeria and Burkina Faso, respectively), the project provided funds for travel and some other costs.

Concerning the importance of this promotional effort, the Review Team did not have a sufficient base to make a firm judgement. However, within the circle of officers already related to GAPIN, this kind of visit (*"Coming from abroad and with the blessing from above"*) was very much appreciated as a means of facilitating and supporting their work.

Regarding the planned communication campaign, it seems to have been limited to the elaboration of new posters (concerning ivory, rhino horn and pangolins) to be placed at ports and other entry points, following the example with the poster on Great Apes which was designed during the first phase. These posters were published in English and French and also served the purpose of *"Giving the project a face, telling people this was an important international initiative"*, as one customs officer told the Review Team. At the same time, however, several interviewees thought the posters could have been clearer in their message and more adapted to national or regional contexts – instead of being designed in Brussels.

12.1.3 The capacity building workshops and the joint border Operations

During the two phases of the GAPIN Project, four capacity building workshops were held, two in Africa and two in Europe, comprising a total of less than 100 customs officers, most of whom were frontline officers (posted at airports or seaports). During this same period, two joint transborder Operations were organised over a period of 10 days each, involving all of the African project countries and supported by a considerable number of Customs administrations in transit and destination countries on other continents. Both Operations were prepared by training and followed up by debriefing activities, where results (mainly seizures and integrity aspects) were summarised and discussed.

These two categories of activities – training workshops and joint border operations – constituted the core of the project, have defined its identity and represent the overwhelming part of the budget. In general terms, there are no doubts at all about their relevance and importance for a project of this kind. However, the effectiveness and efficiency of these activities will entirely depend on *(i)* their quality and costs; *(ii)* their place in a defined strategy towards a sustained process of change, which is likely to yield concrete positive results concerning wildlife trafficking.

Regarding these two crucial parameters, the Review Team does not have an adequate base for drawing verifiable conclusions on the quality and cost level of the workshops and border operations. The second parameter, however, is an issue of concern, as no strategy in this context has been presented. Short-term training of some 100 customs officers, distributed among some 20 countries, may be worth the money and the effort if it is linked, for instance, to an explicit strategy for *training of trainers*, or as a preparatory phase for the establishment of national training programmes to follow, in selected countries.[45] In this case, however, the training effort has not been linked to any explicit plan or strategy, nor are there any clear indications of what may follow.

Concerning the joint Operations, their value may persist for some time even without a wider strategy, due to results generated in terms of a broader and densified international network. Nonetheless, in general terms the same criteria apply also here: if the aim is to use these Operations for training of staff, for improving techniques and for making progress in the efficiency of border control (as a deterrent for wildlife trafficking); then this kind of exercise would need to form part of a well-defined strategy with a reasonable time-frame; otherwise achievements will be of a campaign character only. For instance, acts of corruption and attempts at corruption reported during the operations have often been noted as positive results and as evidence showing the importance of addressing integrity issues. While this is certainly true, a key question for credibility and impact is how these results will be followed up and acted upon in order to motivate officers to continue resisting attempts at corruption, thus decreasing their frequency.[46]

12.2 ORGANISATION AND MANAGEMENT

The organisational set-up of the project is not contained in any official document and is described by the WCO as having been rather light in terms of its structure. GAPIN I was thus co-managed by two officials at WCO Headquarters in Brussels (representing the Capacity Building Directorate and the Enforcement Sub-Directorate, respectively), who were able to include the management of the project as part of their normal work load. GAPIN II was handled in a similar manner, with the two project managers being responsible for *"defining the programme and the sequence of events"*,[47] as well as for the implementation of the different activities.

The normal linkage to the involved African Customs administrations was provided by the *National Focal Person*, who generally was a customs officer who had participated in the project workshops or other similar events. However, WCO's structure as a

[45] Together with changes in the predominance of the "revenue dynamics and incentive structure".
[46] A pertinent case relates to "an officer who stood up to a Chinese businessman, who was escorted by someone from the Presidential office" (GAPIN I, Final Report, p. 9.). The positive aspect was that the customs officer refused to turn a blind eye to the smuggling attempt. However, the aspect which defines the challenge for the future (and for sustainability in the integrity approach) was the fact that the businessman and his escort were not detained.
[47] Personal communication, Mrs. Patricia Revesz, WCO Brussels.

membership organisation comprising most countries in the world, counting on several regional centres and a shared system for intelligence gathering, provided other opportunities for broadening the interface and the contacts when needed. Another useful entrypoint in this context was the ongoing implementation through the WCO of other capacity-building programmes in the same African countries, such as the WCO Columbus Programme. No formalised Reference Committee or Consultative Network was established, even though contacts with other international organisations (intergovernmental, as well as NGOs) were rather frequent.

In other words, management for the GAPIN Projects was not heavy and was done from Brussels. Coordination seems to have combined well with other tasks for the officers in charge, which probably was due to GAPIN's character of being a small and brief initiative, consisting of a few major activities only. Furthermore, the need for reporting was hardly burdensome, as for each project only a Final Report was required, according to a simplified format.[48] (The Final Report for GAPIN II will be delivered by March 2013.) Financial reporting was made easy, though the absence of any agreed format in this context constituted a challenge to the auditors for GAPIN I, who recommended that a template for the kind of report to submit should be previously agreed upon, in order to facilitate coming audits.[49]

Finally, concerning the theme of cost efficiency, so far only the financial report from GAPIN I has been delivered and does not provide any basis for an analysis or estimate in this context. The reason being that many project costs are not quantified as they have been assumed by either the participant customs administrations (concerning their own employees) or the WCO (no administrative fee has been charged).

12.3 PROGRESS IN ACHIEVING THE EXPECTED RESULTS

As the two phases of the GAPIN Project now are coming to a close, the matrix below constitutes an attempt to summarise and comment on what may be observed and concluded in relation to achieving the objectives and expected results.

[48] Which easily could be improved, becoming more analytical and directly related to the expected results.

[49] GAPIN Final Report (Annexes), p.23 (WCO, 2011).

Main objectives for 2010-2012	Comments and observations
Combat illegal trade in wildlife (in particular Great Apes, ivory, rhino horn and pangolin) and enhance Customs integrity concerning enforcement of the CITES Convention. [During phase I, only Great Apes were emphasised and 14 African countries were involved. During phase two, with the broader goal, the group increased to 20 countries.]	Some progress regarding interest among involved actors and a modest degree of field experience gained (through the joint border operations). The critical question is how this experience is analysed and how the conclusions can be applied. Overall, the level and depth of progress is still limited and conditions for sustained progress are meagre.
Specific objectives (or expected results)	**Comments and observations**
Enhanced enforcement capacity in Customs, in particular among frontline officers	Training workshops have involved a total of some 100 customs officers, more or less evenly divided among 20 countries. This is very little; particularly as the training provided has not has been of "training-of-trainers". Some additional training and useful experience have been generated during the two joint transborder operations (with their follow-up sessions). Overall, certain progress may have been made concerning capacity, but in a diluted manner and likely of a short-lived character.
Raised awareness on integrity issues	The issue of integrity vs. corruption has been raised at the workshops and in some other contexts. This may have started a necessary discussion in certain circles. However, no analysis of the structure and magnitude of corruption has been made, to which project initiatives could be adapted. Experience from the joint border operations (with attempts at corruption discovered) will maintain interest only if prosecution and judicial process are seen to follow.
Enhanced detection, investigation and prosecution capabilities of Customs	This specific objective is problematic, as the mandates for Customs vary greatly in the countries involved. In many countries, for instance, prosecution is not a Customs task at all, and also the responsibility concerning investigation may be very limited. In general terms, no or very limited progress made.
Improved communication and cooperation among involved partner countries and agencies	Levels of cooperation have definitely increased between the involved national Customs administrations and with different international bodies and organisations. Concerning the need for collaboration with other relevant national agencies within each country – from the environment, wildlife and the judicial sectors – very little has been done.
Raised public awareness ***on the role of*** *Customs and other relevant law enforcement agencies in the area of wildlife enforcement*	This is a difficult (and not so adequate) objective for a Customs-centred project; even more so without already counting on a firm alliance with the other agencies within this broad field. It seems unlikely that significant progress has been made.
Raised public awareness on the misconception of the medical value of certain wildlife products (i.e. rhinoceros horn).	This seems an implausible objective for a Customs centred project; the information on these issues may have acceptance if emitted from agencies more relevant in this context. It seems unlikely that significant progress has been made.

13 GAPIN Project: Main Findings and Conclusions

The present review of the GAPIN Project generates eight main findings and conclusions:

(i) The initial emphasis of the project goal – *Combatting the illegal trade in wildlife, particularly concerning Great Apes* – has not been consistently in focus, and project goals have changed considerably over time. In the first phase of the project, the composition of countries involved was not congruent with the principal countries of origin and transit in Africa concerning Great Apes. During the second phase, most of these countries were included, but at the same time the scope of the project was substantially broadened to embrace also ivory, rhinoceros horn and pangolin, thus reducing the priority for Great Apes. Over time, the project's main goal can be said to have evolved from *"A project aimed at making a specific contribution for the saving of the Great Apes"* to *"A project enhancing capacities for the full enforcement of the CITES Convention"*.

(ii) The insufficient clarity (and sometimes lack of relevance) in project objectives combined with the absence of criteria for measuring performance have implied that goals and objectives have been of limited use as steering instruments. For all expected results there is a lack of baseline data, no quantified definition of what the results should imply or criteria for establishing progress. Moreover, certain expected results were simply not feasible for a project implemented by Customs. Consequently, the major events comprised by the project (training workshops, joint border operations) have not been tightly adjusted to the established goals in order to increase prospects for goal attainment, but have rather become activities of their own, and, to some extent, goals in themselves.

(iii) There is a considerable incongruence between the project goals, on the one hand, and the design and time horizon, on the other. Taken together, the GAPIN Projects have had a maximum budget of some €700,000, and were supposed to actively involve authorities within 20 countries located all over the African continent (plus a number of Customs administrations within transit and destination countries in other continents) – all within less than 18 months. The main instruments for achieving the expected results were to be five or six training workshops, two joint border operations, some internal promotional activities and certain activities within the field of communication. Capacity building workshops have reached a total of approximately 100 customs officers, most of them frontline officers. Also two joint transborder Operations have been organised for a period of 10 days each, involving all of the African project countries and supported by a considerable number of Customs administrations in other continents. Short-term training of 100 customs officers, distributed among some 20 countries, may generate some tangible and sustainable results if linked, for instance, to an explicit strategy for *training of trainers*, or constitutes a preparatory phase for the establishment of national

training programmes to follow, in selected countries. In this case, however, the training effort has not been linked to any explicit plan or strategy. The same applies for the joint border Operations.

(iv) The project design is not linked to a concrete problem analysis, addressing neither institutional realities and incentives, nor current characteristics of wildlife trafficking. The specific objectives of the project reflect the view that the best way of combatting wildlife trafficking is to apply the CITES Convention and that the deficiencies hitherto in this respect are mainly due to lack of knowledge, know-how and awareness within Customs, in combination with a certain degree of corruption; a situation which can best be alleviated through training of customs frontline officers. However, nothing is said about the root causes for the situation up to present time - with enforcement of CITES hitherto having had very low priority and limited application in the selected African countries. This includes the institutional dynamics, incentives and other factors that have been reproducing this situation – and preconditions for a transformation become viable. The assumptions in the project document that the lack of enforcement capacity can be reduced to a knowledge problem and that the magnitude and principal features of corruption can be handled through awareness raising among frontline officers seem unrealistic. Thus, the project's theory of change – as viewed through the selection of specific objectives – cannot be deemed plausible as the sphere of influence of the project in the broader context is not explored.

(v) The internal learning process has been weak, as well as critical analysis concerning the implementation process in relation to the desired goals. This may explain why the experience from the first phase of the project (GAPIN I) – which obviously should be considered a pilot phase – was not sufficiently analysed and used to inform the design process for GAPIN II. Another case in point was the approach applied at the Project's meeting in Lusaka in December 2012, where the main theme on the agenda for the second and last day was to discuss participants' experience so far and their proposals concerning *The Way Forward*. Notwithstanding this purpose, the list of questions provided by the conference management for this discussion (undertaken first in working groups, then in plenary sessions) did not contain aspects such as *"Important problems faced?"*, *"Relevant weaknessess or shortcomings identified?"*, or even *"Challenges for the future?"*.[50]

(vi) Ownership in institutional terms is still at best incipient and few other relevant authorities at the national level than Customs have been involved. The GAPIN Project was initiated as it corresponded to a direct political interest from the Swedish Government. It was for this reason that the WCO was contacted and agreed to elaborate a project proposal along the lines of the interest expressed by the Swedish MFA. Once the project had been approved, WCO sent an invi-

[50] Nor was this kind of aspects mentioned in the final conclusions delivered by the WCO officers at the closing of the event.

tation to the Directors General of the National Customs Administrations in the 15 African countries which had been selected, offering them the possibility to participate in the project. During the design and starting-up of the project, ownership was thus located outside the group of the countries which subsequently were invited to participate. During implementation, the short lifetime of the project, the character of its main activities and its enormous geographical scope were conditions not conducive towards a change in the ownership situation. Moreover, the project was managed from the WCO in Brussels, with no formal steering body including high-level representatives in the involved countries. Participation from customs officers in training workshops and border operations has generated interest and also enthusiasm, but should not be assumed to indicate ownership in institutional terms. As long as the high-level management and Government representatives are not on board as well, ownership is still likely to be weak.

Concerning actors involved, the group of participants within the project has mainly been that of national customs and some international organisations. Few or almost no national actors within the fields of the environment, wildlife or law enforcement have been involved in a significant manner.

(vii) Prospects for reaching the expected results within the defined time period and with any reasonable degree of sustainability are meagre. This follows partly as a consequence of the mismatch between goals, design, time span and resources provided, as well as the shortcomings concerning the definition of expected results. It is then further reinforced by the lack of national institutional ownership and the reduced circle of national actors involved so far.

(viii) In spite of all its shortcomings, the project has generated considerable interest among Customs officers and gained positive response from several international actors within this field. This has been expressed on several occasions to the Review Team both by individual customs officers and institutional representatives from key international bodies, with some of the latter pointing out that no other program is targeting customs frontline officers in Africa.[51] A more detailed analysis of the GAPIN experience may thus contribute to consideration of different kinds for enhanced efforts against wildlife poaching and trafficking.

The first seven findings – which all deal with shortcomings and weaknesses – are judged to be the result of two major deficiencies. *Firstly*, the project came into being more as a campaign for transmitting political messages (considered important by the Swedish Government) than as a normal development project. *Secondly*, the lack of analysis and contextualisation of the problem by WCO in order to arrive at a more realistic approach.

[51] E-mail communication from Roland Melisch, Senior Director, Africa and Europe, TRAFFIC International.

The eighth and last finding is interpreted by the Review Team as a lesson learned concerning prospects for gaining interest within Customs, particularly at the field level. The positive comments about GAPIN expressed at the international level seem to reflect both the great need for coordinated measures in general (in what currently is a situation of crisis for wildlife conservation), and the understanding that in order to become effective, these efforts need to also involve Customs.

14 GAPIN Project: Recommendations

The first recommendation is not to prolong or continue the GAPIN Project in its current form, due to the shortcomings in the project design and the lack of prospects for achieving effective and sustained results, as exposed earlier in this Review. However, this should not be interpreted as suggesting an abrupt closing down of the project. A planned phasing out period is likely to be more constructive, during which the experience gained can be more profoundly systematised and analysed, preferably in a joint effort shared with international organisations which have been actively involved. This phasing out period could also be utilised to define concrete ways of integrating GAPIN-like objectives into ongoing technical assistance initiatives (such as Sida's Columbus Project) through the WCO.[52]

The second recommendation applies if there should be an interest to continue supporting efforts against wildlife trafficking involving Africa. In that case, it is strongly recommended that the process first should include a mapping and analysis of already existing and planned initiatives.[53] All potential proposals for new Swedish support or initiatives should depart from the fact that preventing illegal trade in threatened species is a very complex endeavour, which recently has become even more difficult due to a fundamental shift in the structure and operation of wildlife crime. The theory of change of any intervention must take into account its potential sphere of influence in relation to this new situation.[54]

The third recommendation applies if interest for continued Swedish support in this field should be advancing towards the elaboration of project proposals. In that case, it is strongly recommended that the first set of questions which has to be addressed from the outset should include the following: *What is the main purpose of the effort, which is the specific approach to be selected and what host or coordinating institution would be best suited in this context?*

Responding to these questions in a reasonably precise manner may require a discussion on the following aspects, among others:

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[52] See further section 6.6.2 above on potential synergies between the Columbus and GAPIN projects.

[53] In this context it should be noted that the US Department of State recently (November 8, 2012) hosted an event titled *International Partnership Meeting on Wildlife Trafficking and Conservation: A Call for Action,* where a new major initiative in this context was announced, to be funded by the United States Agency for International Development (USAID) and coordinated by the International Union for Conservation of Nature and TRAFFIC. The new initiative was tentatively called *Wildlife Trafficking Response, Assessment and Priority Setting (Wildlife TRAPS)* and should have a focus on trans-regional trafficking. (http://www.state.gov/r/pa/prs/ps/2012/11/200355.htm)

[54] For a recent and analytical contribution in this context, see *Dismantling Wildlife Crime* (Nov 2012).

(a) Is our main goal to make a real difference concerning wildlife trafficking as such or do we focus on other goals, such as, for example, customs modernisation and (safe) trade facilitation, where enforcement of existing rules (such as the CITES Convention) could be one of several indicators, generating a positive side-effect concerning wildlife management?

(b) Do we wish to primarily target certain species – due to their current alarming situation (or to avoid such a situation within the near future) – or are we aiming at a general implementation of the CITES Convention? What species can realistically be combined within the same kind of effort – depending on geographical coverage, the kind of threats they are exposed to, etc?

(c) Should the contribution mainly seek to enhance seizures and law enforcement (customs, police, judiciary, international organisations fighting organised crime, etc.)? Or should it concentrate on different forms of prevention, at the national level (community wildlife management, enhancement of wildlife related tourism, efficiency of national wildlife services, etc.) and/or in an international context (mechanisms for effective compliance with existing and new international trade rules in destination countries, efforts for reducing consumer demand concerning these products, etc.)?[55]

(d) If the Customs Administration is the chosen host agency, then it will be of crucial importance to carefully consider the overall strategy and entry points in order to change institutional performance in a context where many factors are favouring the reproduction of status quo. (Such as the incentive structure related to the predominance of revenue collection, as well as interests of other kinds - what is the size and structure of corruption within each system and how could it be addressed?) The main challenge in this context is how to achieve the integration of the control function concerning transit and exports in the daily routines at Customs, at an adequate level of priority. (Thereby deterring wildlife trafficking and making the country a fully reliable partner in international trade contexts). Concerning all these – and other – aspects of core institutional features where change will be required for achieving success – ownership is key. Adequate alliances with other national actors (public authorities as well as civil society organisations) should also be defined and acted upon.

(e) Another crucial dimension relates to the need for political support, preferably from the highest national level, for effectively promoting the project and drive home the message on *Why this is good for our country*.

[55] Serious thinking on innovative strategies for demand reduction has been advancing lately. See, for instance publications by TRAFFIC (2012) on this topic.

Annexes

ANNEX A – TERMS OF REFERENCE

Review of Swedish support to WCO capacity building 2008-2012

1. **Evaluation purpose**

Sweden has supported two different projects in Africa implemented by the World Customs Organization (WCO). These projects are titled: "Capacity Building Programme – Regional Implementation of the Columbus Programme – Phase II in sub-Saharan Africa" (hereinafter referred to as the Regional Columbus Project), and "GAPIN" (abbreviation for great ape, integrity). The Regional Columbus Project has been financed by Sida since 2008 and the GAPIN project by the Swedish Ministry for Foreign Affairs since 2010.

The overall objectives of the Regional Columbus Project are the development of a sustainable and improved economy in Africa with regard to trade, security and social protection through development of Customs authorities as fair and effective trade management partners as well as modern social protection and revenue collection services. The overall objective of the GAPIN project is to prevent illegal trade in wildlife – in particular great apes (chimpanzees, gorillas, and bonobos) and the enhancement of Customs integrity to prevent CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) fraud to take place. These two projects are to be evaluated.

Sida's Regional Section at the Embassy in Nairobi, and Sida's Resource Unit 1 under the Department for Programme Cooperation (PROGSAM) will use the evaluation both to follow-up the projects undertaken, but also to draw lessons from the projects implemented when considering future collaboration with the WCO in these areas. The evaluation may also be used by other Sida Departments and Units if they consider support to similar projects in the future. In addition, the evaluation could assist other Swedish governmental organisations, and possibly other partners with which Sida will cooperate, in their design of similar future projects.

The main aim of this assignment is to evaluate whether the projects have fulfilled their objectives. This includes identifying and considering any poverty-reducing linkages and effects. In addition, Sida is looking for an analysis and description of what has worked well, and suggestions for improvements to similar future projects.

2. **Intervention background**

In 2006, the World Customs Organization (WCO) initiated a number of capacity building programmes and activities. The most significant is the "Columbus Programme: Aid for SAFE trade". WCO claims that the Columbus Programme is the largest and most comprehensive customs capacity building initiative on record. The purpose of the Columbus Programme is to promote sustainable customs modernisation through implementation of the WCO Framework of Standards to Secure and Facilitate Global Trade (SAFE). It should assist selected developing countries reform, strengthen, and modernise customs administration and management in order to harmonise with international standards to facilitate cross border trade.

Trade facilitation in general, and customs in particular, has for several years been a priority area for Swedish trade-related development cooperation. Support provided through the World

Customs Organization is a natural part of this support. The first larger (SEK 45 million) collaboration over five-years (i.e. the Regional Columbus Project) is nearing its end and it is time to evaluate. This project has been financed through the regional Africa appropriation and mainly supported work in the three regional economic communities: East African Community (EAC), South African Customs Union (SACU) and Economic Community of West African States (ECOWAS).

The project proposal for the Regional Columbus Project, upon which implementation is based, was somewhat unclear as to the results at output, outcome, and impact level, and this contributes to the evaluation challenge. Nevertheless, a mid-term review of this project is available.

The overall objectives of the Regional Columbus Project are: the development of a sustainable and improved economy in Africa with regard to trade, security and social protection through the development of Customs authorities as fair and effective trade management partners as well as modern social protection and revenue collection services.

More specifically this project aims at assisting the Member Countries of EAC, SACU and ECOWAS to meet their specific objectives towards the achievement of regional customs unions. It also aims at assisting the Ethiopian Customs and Revenue Authority (ERCA) in its effort to establish effective custom service with the aim to meet the requirements of the SAFE FoS. However, this latter part is not to be specifically evaluated.

The specific objectives of the Regional Columbus Programme project are:

A) To assist the customs organisations in the EAC region to design and implement a comprehensive regional reform programme with a focus on:
   - Enhanced trade management
   - Movement in line with the EAC desire for a Customs Union
   - Introduction of a broader approach towards Border Management and Risk Management.

B) To assist the customs organisations in the SACU region to design and implement a comprehensive reform programme aiming at achieving the criteria for merger into the SADC region until 2014.

C) To assist the customs organisations in the ECOWAS region to develop and enhance the management skills and competence amongst top & middle managers in the customs in order to be able to run and facilitate more advanced regional projects in the future. As part of the work in the ECOWAS region, assistance will be given to Liberia within a signed multipartite agreement between Swedish Customs, Ghana, Liberia, and the WCO for the provision of technical assistance in order to:
   - Enhance capacity to manage seaport, Airport and border operations and procedures
   - Build capacity to migrate tariffs to WCO 2007 HS nomenclature
   - Strengthen capacity to develop Standard Operating Procedures for key operational areas
   - Develop integrity

D) To assist the Customs organisation in Ethiopia in the establishment and management of its customs reform programme with the aim to meet the requirements of the SAFE FoS.

In parallel to the support provided through the WCO by Sida, the Swedish Ministry for Foreign Affairs has also been collaborating with the WCO. Illegal international trade in endangered species is together with illicit drugs and weapons a major trade-related problem. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) aims to supervise and regulate international trade with, among others, trade in endangered species. Complementing efforts can and should be undertaken in the area of trade in general, and customs in particular.

The WCO implemented a project called GAPIN (abbreviation for Great Ape, INtegrity) during 2010-2011 with Swedish support. The aim of the GAPIN project was to build capacity in 15 African countries to implement the rules under CITES and to counteract corruption. The WCO thereafter proposed a GAPIN II project based on the result of the implementation of the GAPIN I project and the demand from the participating countries for continued support. The aim remains the same while the participating countries were enlarged by five more countries having proven to constitute both a source of and a transit for the illegal trade in apes, tusks, pangolins and rhino horns. The total budget for the implementation of GAPIN II in 2012 is SEK 4 250 000.

As Sweden and the WCO is looking into the possibility of combining a possible continuation of the Regional Columbus Project and a possible continuation of GAPIN II as different components of one future regional project it is deemed appropriate to evaluate and collect previous experiences, lessons and recommendations for the future of the two projects at the same time.

3. Global and specific objectives of the evaluation

The goal of the evaluation is to assess the overall performance of the projects (excluding a special analysis of the Ethiopia component). There are two global objectives of this exercise. The first is to identify how effectively the pilot projects have been implemented and what the results are. The second is to state whether continued collaboration based on the two projects is recommended or not, and to provide WCO and Sida with suggestions for possible improvements in future project design, implementation, follow-up, and evaluation. The outcome of this exercise shall reflect the strengths and weaknesses of the current project implementation approaches. It should also suggest ways of enforcing the observed strengths as well as improving on the weaknesses.

Under these global objectives, there are ten specific objectives of the evaluation. They are to (to the extent possible):

1. Assess the extent to which ownership has been ensured. This includes, but is not necessarily limited to, the involvement of stakeholders in project initiation, design, implementation and follow-up;
2. Evaluate the efficiency of the implementation of the various activities and processes included in the two projects;
3. Evaluate the effectiveness of the implementation of the pilot projects by assessing inputs, outputs and outcomes against the targeted project results;
4. Assess whether the projects are cost-efficient overall in light of the overall goal of Swedish development cooperation to contribute to enhance poor people's ability to improve their living conditions;
5. Evaluate the management capacity, capability and suitability of the WCO and its network of experts in effectively implementing the projects (including WCO's capacity to plan, implement, follow-up and report on the projects);
6. Assess the ability of the WCO to ensure an appropriate phase-out of its involvement in the projects;
7. Evaluate the performance of the Regional Africa Columbus Project to prepare countries in the EAC, SADC and ECOWAS regions for future customs unions;
8. Assess whether results achieved are likely to be sustainable;
9. Formulate recommendations on how to improve the design and implementation, and thereby performance of future similar projects; abd
10. Recommend Sida whether to continue collaboration with the WCO on the two projects or not.

4. **Evaluation questions**

To assist the evaluation team understand the purpose of the review, Sida has identified a number of specific questions regarding the projects which Sida would find it useful for the evaluators to consider. Below follows a list of questions which the Assignment may attempt to respond to. These are only listed in order to assist the consultant's own reflection. It is emphasised that they do not constitute a check-list and that the consultant should have additional queries, deliver his/her own analysis, and structure the report in the most logical way according to the information gathered and the findings of the analysis made. Keeping these reservations in mind, the following questions may be of assistance to the consultant:

A. Ownership
- To what extent were stakeholders initiating the projects or consulted on the project objectives and/or able to influence the project design?
- Were the participants selected the most relevant ones? Do they together represent a broad spectrum of stakeholders?
- Do the stated objectives correctly address the problems and real needs of the target groups?
- Were the activities implemented in a participatory and empowering manner?
- To what extent did stakeholders influence the implementation of the projects?
- To what extent have stakeholders been involved in follow-up?

B. Project Design
- What type of capacity was built?
- Was awareness raised among a broad group of stakeholders of the importance of the relevant aspects of customs?
- How was capacity built?
- Have the projects enhanced the possibilities for customs cooperation in Africa and the ability of customs authorities in the region to cooperate?
- Are the means chosen for capacity building and regional collaboration likely to be the most efficient ones?
- Was the content of the capacity building the most adequate and of sufficient quality to reach the stated outcomes?
- What are the reasons behind the discrepancy in the implementation of the Regional Columbus Project in the three regions concerned?

C. Effectiveness and Efficiency
- Were the projects inputs (funds, expertise, time, etc) converted into results in required quantity, quality and time?
- Were the resource persons/experts etc selected the most relevant ones considering both their thematic and geographic knowledge?
- Have synergies with other initiatives by the WCO and others (such as the World Bank Trade Facilitation Fund and TradeMark East and Southern Africa for example) been used, unnecessary duplication avoided, and timing coordinated?
- Was the use of the projects resources cost-effective?
- Has the WCO been able to manage these projects efficiently and cost-effectively (including from an administrative point of view)?
- Are these types of projects cost-efficient?
- What are the reasons behind the different paces of implementation in the EAC, SACU and ECOWAS regions under the Regional Africa Columbus Project?
- To what extent have the projects purpose and results been achieved?
- To which extent have the projects contributed to a higher degree of regional ownership and cooperation in customs?
- Have the projects supported regional integration in the EAC, SACU/SADC and ECOWAS and/or at the pan-African and bilateral levels or are the projects exclusively enhancing capacity at the national level?

D. Sustainability
- Did the projects produce any sustainable changes – positive/ negative, intended/un-intended on the target groups?
- What thought and practical implementation has been devoted to a responsible phase-out?
- Are some of the project benefits/outputs likely to be sustained after end of the project?
- What efforts have been made to ensure the sustainability of positive results?

E. Improvements
- Were lessons collected during the implementation of the projects? If so, did lessons learned transfer into real changes?
- What suggestions for improvements to similar future projects can be made, particularly if measures need to be taken to enhance the poverty reduction impact?
- Can a new phase of the Regional Columbus Project be recommended for Swedish support (in general based on previous experience and not having seen a new project proposal)?
- Can a new phase of the GAPIN project be recommended for Swedish support (in general based on previous experience and not having seen a new project proposal)?

5. **Stakeholder involvement**

The evaluators shall interview a large number of the participants and all WCO staff (present and past) involved in the delivery of the two projects.

At a minimum, a selection of stakeholders (among those interviewed) shall be presented with the opportunity to comment on the draft report.

How otherwise the utilisation-focused evaluation approach is to be applied for this review is to be discussed between the evaluators and Sida.

6. **Methodology**

Sida suggests that the Assignment is implemented in the form of a desk-study, interviews and field visits, the latter preferably in connection with an ongoing activity. The methodology may be discussed between the evaluator and Sida. Sida is open to suggestions for methodological improvements from the evaluator. However, this is not a requirement if the evaluator judges these Terms of Reference to manageable and sufficiently clear.

A detailed description of evaluation methods proposed by the evaluator should be part of the call-off response. There is a need for the evaluators to be in close contact with both the WCO Secretariat and other stakeholders of the two projects. However, the evaluators shall show tact and discretion in their contacts with the WCO Secretariat and other stakeholders. While these contacts are necessary to fulfill the evaluation tasks, the evaluators shall endeavor to minimise the disruption caused by the evaluation and ensure that no unnecessary burden is put on either the WCO Secretariat or other stakeholders of the two projects. This aspect shall be kept in mind by the evaluators in the proposed methodology.

A possible approach, including four primary tasks, is described below.

Task 1: Study available material

The Evaluator shall:
- Study all available documentation. Unfortunately, the final reports the WCO is required to submit on the two projects will not be available to the evaluators as project

implementation will be ongoing during the evaluation period. However, a mid-term review is available.

This task will be undertaken as a desk-study using existing written material.

The background material for the Assignment consists, inter alia, of:
- the project descriptions (initial and revised project proposals),
- the Agreements between Sida, and the Swedish Ministry for Foreign Affairs and WCO, including all revisions and amendments
- the annual project progress reports (both narrative and financial),
- audit reports covering the projects,
- The participants' replies to any questionnaires related to activities under these projects (if any), and WCO's possible summary and analysis thereof (if any),
- Information available through the Websites of the WCO, EAC, SACU, ECOWAS and CITES,
- Relevant Press releases,
- the Mid-term review, and
- any other relevant documentation.

Task 2: Conduct interviews

The Evaluator shall:
- Conduct interviews with the target beneficiaries and other relevant people in the EAC, SACU, and ECOWAS regions including, but not limited to, the EAC, SACU and ECOWAS Secretariats, national customs authorities, ministries of trade, the private sector, civil society and possibly other stakeholders such as academia etc, people involved with the projects at the WCO Secretariat and WCO's Regional Offices for Capacity Building and other regional WCO-related staff (at all levels and including both past and present staff), WCO's network of customs experts having been involved in the projects, Sida (including Peter Cederblad and Ingela Juthberg), the Ministry for Foreign Affairs (including Catarina Hedlund) and any other persons identified as a possible source of information during the above-mentioned interviews or during the process.

Task 3: Field visits

The Evaluator shall:
- Visit the EAC, SACU and ECOWAS regions to conduct interviews in person with stakeholders, if possible combined with assisting at project activities (where feasible).

A selection of stakeholders in the EAC, SACU and ECOWAS regions involved in the projects shall be asked how they perceive the pilot project and its effectiveness, impact, relevance, sustainability and efficiency, and should be given the opportunity to comment on the draft report.

If the information collected through the two above-mentioned tasks is considered insufficient to fulfill the Assignment, the evaluator should immediately contact Sida.

Task 4: Draft reports

The Evaluator shall submit an inception report, and both a draft and a final report.

7. **Workplan and schedule**

The assignment is to be implemented during a period from 11 September 2012 to 31 December 2012. The maximum amount of time which can be debited for this Assignment is 500 hours (however, the number of hours will have to be reduced if only consultants from the most expensive category is used).

8. **Budget**

The ceiling level for reimbursables which may be debited for this assignment is SEK 135 000. This amount includes all types of reimbursable costs, including the formatting of the final report into the Sida Reviews format, getting an ISBN number, and the publication of it on Sida's online documentation database. The maximum total amount the consultant may debit Sida for this assignment may not exceed SEK 625 000.

9. **Reporting**

A first inception report shall be submitted to Ingela Juthberg (Ingela.Juthberg@sida.se) at the latest by 15 November 2012. A draft report shall be submitted no later than 14 December 2012. Selected stakeholders including WCO, the Swedish Ministry for Foreign Affairs, and Sida shall be given the opportunity to comment on the draft report. The final report shall be submitted at the latest two weeks after having received the comments from stakeholders, the WCO and Sida. Furthermore, the consultants shall, as soon as they have an indication of preliminary findings and recommendations, inform Sida (i.e. Ingela Juthberg and/or Maria Liungman) informally (either orally or through e-mails).

All reports shall be drafted in the English language. The final written report shall be of a maximum length of 30 pages, excluding Annexes. An Executive Summary of a maximum length of 3 pages which contains the main findings shall be included in the report. The Executive Summary shall include the main conclusions about the extent to which the projects have fulfilled their objectives, what has worked well, whether the consultants recommend the projects to be continued, and suggested improvements for similar future programmes. The evaluator shall, as far as possible, adhere to the terminological conventions of the OECD/DAC Glossary on Evaluation and Results-Based Management.

As part of the Assignment, and preferably before drafting the final report, the evaluator shall make him/herself available for a presentation of observations and preliminary conclusions to personnel concerned at WCO, the Swedish Ministry for Foreign Affairs and Sida.

At the request of WCO, the Swedish Ministry for Foreign Affairs, or Sida, the evaluator shall make himself available for discussions on recommendations and conclusions.

Once the final report has been approved, the consultant is responsible to commission and ensure that the report is proofread, formatted and published in Sida's online database.

10. **Evaluation team**

Apart from including advanced evaluation expertise, the evaluation team for this Assignment needs to possess extensive knowledge in international trade policy, especially how it is implemented regionally and nationally in a developing country context. A further requirement is that the evaluation team possesses extensive knowledge about trade facilitation in general and of customs in particular. The evaluation team also needs to be fluent in English and French, both orally and in writing. This includes total fluency with respect to the terminology used in international trade policy in general, and with respect to customs in particular. In addition, the evaluation team has to possess sufficient knowledge about the economic situation and economic/trade policy-making in the EAC, SACU and ECOWAS regions to be able to make a judgment on the relevance of the projects. Moreover, the evaluation team has to encompass deep knowledge about the CITES convention and its application. Furthermore, the evaluation team needs to be sufficiently acquainted with the cultures of the EAC, SACU and ECOWAS regions to ensure that it manages to solicit honest impressions from the stakeholders.

Finally, it is a requirement that all individuals involved in this Assignment are completely independent of the evaluated activities, including, but not limited to, project design and management, WCO, CITES, as well as the public and private organisations/companies/NGOs, both in Sweden and in the EAC, SACU and ECOWAS regions involved in customs and the application of the CITES Convention, and that they have no stake whatsoever in the outcome of the evaluation. This includes a requirement that nobody on the evaluation team shall previously have evaluated any of the activities included in the two projects.

11. **Other aspects**

For reasons of human resource development, it shall be possible for Sida personnel or staff from the Ministry for Foreign Affairs to participate in the work of the evaluators as observers, and to accompany the evaluator(s) on visits in Sweden and in the field. The evaluators shall therefore inform Sida and the Swedish Ministry for Foreign Affairs about when they are likely to undertake visits in Sweden and in the field.

ANNEX B – PEOPLE INTERVIEWED

Columbus and GAPIN Meetings, October–December 2012

Andrea Spear, Sten Ström, Pierre Fruhling

Place, Date, Time	Person, Title, Organisation,
Brussels 4/10 **Andrea Spear and Sten Ström**	**World Customs Organization**, Capacity Building Directorate, Elke Portz, Sida Project Manager Heike Barczyk, Deputy Director, Capacity Building Patricia Revesz, GAPIN officer Mats Wictor, Sweden Customs, also EAC Jochen Meyer, Finance Patric Dewandre, CFO
Stockholm, 8/10 **Sten, Jessica, Andrea (tel)**	**Sida** **Ingela Juthberg**, Sida Project Manager **Maria Liungman**, Nairobi-based Project Manager
Stockholm, 11/2012 **Sten**	Swedish Ministry of Foreign Affairs Catarina Hedlund,
Stockholm, 11/2012 **Sten**	Swedish Customs Christopher Kristenson,, former WCO Capacity-Bldg Directorate
Geneva, 12/11/2012 **Andrea**	UNCTAD: José María Rubiato, Director, Trade Facilitation Division
Geneva, 16/11/2012 **Andrea**	**CITES Secretariat** **Pia Jonsson**, Enforcement Support Officer **Tom De Meulenaer**, Scientific Support Officer, Scientific Services
Geneva, 16/11/2012 **Andrea**	WTO Trade Facilitation Division Richard Eglin, Director
Granada, Nov 2012 **Pierre (by phone)**	Annie Olivecrona (a Swedish Great Apes consultant & saver; living in Kenya)

Windhoek, Namibia

Date/Time	Person, Title, Organisation,
Sunday, 18/11, 1130-1300 Andrea	**Mr Oscar Muyatwa,** Director, Trans-Kalahari Corridor Secretariat
Monday, 19/11, 0745-0930 Andrea & Maria Liungman	**Ms Rosemary Bokang Mokati, Regional Programme Manager** Ex Lesotho Customs
0940- 1010 Andrea & Maria	**Ms Susan Beukes**, **National Project Manager,** Col. Project, and Namibia Customs Head of Training, Procurement, Resource Mobilisation (+ change management)
1010-1110 Andrea & Maria	**Ms Francina Shigwedha**, **AEO & Business Forum Section/Unit**
1110-1230 Andrea & Maria	**Risk Management Unit: Ms Charlotte Winkler**, Head**, Mr Coatzee** (Tobacco), **Mr Tibor** (Enforcement)
1500-1615 Andrea & Maria	**Mr Bevan Simataa, Commissioner** of Customs and Excise, Columbus Project **SC Member**
Tuesday, 20/11, 0900-1000 Andrea	**Mr. Harald Scmidt**, Director, **Namibia Logistics Association**
1100-1200 Andrea	**Ms Saima:** Manager, **Preventative Measures and Investigations** (Enforcement) Section, Customs
1330-1430 Andrea & Maria	**Mr. Dumisani Mahlinza**, Director, Revenue Management and Trade Facilitation, **SACU Secretariat**

Pretoria. South Africa

Date/Time	Person, Title, Organisation, Address
Wednesday, 21/11: 0900 Andrea & Maria	Ms **Seboya Mogoba**, Customs Coordination Officer, SARS
0900-1000 Andrea & Maria	**Varsha Singh,** Manager External Relations, SARS
1000-1130 Andrea & Maria	**SARS**: selection of officers who attended WCO Columbus Project and GAPIN workshops/activities: **Thabile Ntombela** (International Customs) **Mike Poverello** (IT) and **Anisa** **Patrick Moeng** : (GAPIN) **Kumaren Moodley** (Enforcement) **Helga Labusgagi** (Public Relations)
1200-1300 Andrea & Maria	**TradeMark Southern Africa**: **Ms Stella Mushiri**, Deputy Programme Director **Ms Fudzai Pamacheche**, ex-Columbus Project Mgr, SARS
13H30-1430 Andrea & Maria	**Philip Wyllie**, Director, South African Freight Forwarders Association

Gaborone, Botswana

Date/Time	Person, Title, Organisation, Address
Wed, 21/11, 2030-2145 Andrea & Maria	**Marcel L. Ratsiu ,** Customs Manager, **SACU Secretariat**
Thursday, 22/11, 0700-0900 Andrea	**DHL Express Delivery** **Ralph Chigoya**, Head Ops-Central Africa and Indian Ocean Islands, Harare, Zimbabwe **Dave Perumal**, Customs Affairs Mgr, Johannesburg, SA **Gerard Sta Maria**, Director Customs & Gateways, Cape Town, SA
1030-1100 Andrea & Maria	IT expert at SACU SCM **Vuyokazi Mokoena**, National Project Manager, SARS
1330-1430 Andrea & Maria	**Mr Thabo Moleko,** Commissioner Customs and Excise **Lesotho Revenue Authority**
1530-1600 Andrea	**Mr Gofaone Gabositwe** National Project Manager, Botswana
1800-2000 Andrea & Maria	**Elke Portz**, Columbus Project Manager, and **Erich Kieck**, Director WCO Capacity Building Division
Fri 23/11, 08:00-0900 Andrea	**Botswana Revenue Service: Buhalo Modongo,** General Manager, Regions & Compliance
0900-0930 Andrea	Ms **Gaone Arieff,** Team Leader, AEO Project, **Botswana Revenue Service**
09:30am Andrea	**Pioneer Gate border post** with Ms **Chipo Mokgwathi**, Trade Facilitation Officer, Botswana Revenue Service
1045-1215 Andrea	**Mr Mpuang**, Border Post **Station Manager; and Dep. Mgr.**
1600-1700 Andrea & Maria	**SADC: Dhunraj Kassee** Programme Officer-Capacity Building (Customs), Southern African Development Community, Trade, Industry, Finance and Investment Directorate (TIFI) , Gaborone

Nairobi, Kenya

Date/Time	Person, Title, Organisation, Address
23-25/11 emails	Mr. Kenneth Bagamuhunda, Director of Customs, EAC Secretariat
Monday, 26/11: 0900-1015 Andrea & Pierre	**Mme Beatrice Memo, Kenya's Commissioner of Customs** Jonah Cheruiyot, Deputy Samuel Karioki, Policy Unit Kiprono Bullut, Projects Reform Mr Habil, her officer
Mon, 26/11, 1500-1800	Mr Jonah Cheruiyot, National Project Manager,

Andrea	**Kenya Customs + AEO team members:** Jane Ombui Robert Kireri Danie Nyambaka Lucia Ndeto, Audit/Compliance
Mon, 26/11, 1500-1600 **Pierre**	**Mr. Phelix Ohato, Kenya Customs and WCO Regional Intelligence Liasion Office, RILO**
Monday, 26/11, 1700 **Pierre**	**Mr Johannes Rehfisch,** GRASP Programme Manager **UNEP, Nairobi**
Tuesday, 27 /11, 0830 **Pierre**	**Mr Doug Cress, Director GRASP** (formerly Director, PASA)
Tuesday, 27 Nov, 1000-1200 Andrea & Pierre	**WCO Regional Intelligence Liaison Office for Eastern and Southern Africa** -WCO RILO ESA, Customs Services Department Mr Phelix Ohato Ms Josphine.Mwadime Ms Kellen.Njeru
Tuesday, 27/11, 1330-1530 **Andrea**	**TradeMark East Africa** **Mr Scott A**llen and team: **Penny Simba**, EAC Programme Technical Director, former Uganda Revenue Authority **Sydney Chibbabbukka** (1-stop Border Posts, Single Customs Territory) **Jonathan Sessanga** (Customs IT) **Stephen Analo** (Customs Training) **Graham Johnson**, former senior UK Customs officer **Theo Lyimo**, former Sr Tanzanian Customs, ex Deputy Dir, WCO **Jason Kapkirwok**
Tuesday, 27/11, 1430**: Pierre**	**Mr Kenneth Ochola,** Remissions Dept, **Kenya Customs**, formerly RILO
Tuesday, 27/11, 1630 Andrea & Pierre	**UNODC Mr Bjorn Clarberg,** Head of Law Enforcement Programme, UNODC Regional Office East Africa (ROEA)
Wednesday, 28/11, 0900 **Andrea**	**Kenya Ministry of Trade** **Ms Anne Kamau,** WTO Director

Kigali, Rwanda

Date/Time	**Person, Title, Organisation**
Thursday, 29/11, 0700 Andrea & Pierre	**Mr Richard Tusabe,** Commissioner of Customs, Rwanda, and WCO-EAC Steering Committee Member
Thursday, 29/11, 0830-1230 Andrea	**Ms Peace Kayitesi**, National Project Manager, Rwanda **+ AEO Team (3 people)**
Thursday, 29/11, 0830-0930 Pierre	**Mr. Emmanuel Bitegekimana** (frontline officer, Rwanda Customs) **Ms. Denise Tumukunde** (frontline officer, Rwanda Customs)
Thursday, 29/11, 1430-1600 Andrea	**Mr Mark Priestley, Director,** TradeMark East Africa-Rwanda Office + **Customs-liaison officer**
Thursday, 29/11: Pierre	Courtesy phone call to Sida/Swedish Embassy representative
Thursday, 29/11, 1300-1400 Pierre	**Director of the National Interpol Bureau in Rwanda** **Mr. CIP Ismael Baguma, Chief Inspector**
Thursday, 29/11, 1530-1630 Pierre	**Rwanda Development Board** **Albert Kayitare, Wildlife Officer, Dept Conservation & Tourism**
Friday, 30/11, 0800-1930 (1200-1600 at border) Andrea & Pierre	**Border post visit (WCO-EAC pilot project post + 1-stop shop+ Single Window):** Rwanda/Tanzania crossing at Rusumo
Friday, 30/11, 1430-1530 Andrea & Pierre	**SME traders at border**
Saturday, 1/12 Andrea	Andrew Thorburn, Market Linkages Adviser TradeMark East Africa
Sun, 2/12 Flight to GVA: Andrea	Palesa Moitse, South Africa Rev Services Senior Specialist International Trade (TF)

Abuja, Nigeria (Pierre Fruhling)

Date, Time	Organisation, Person, Address
Sunday, 2/12 **Pierre**	Mr. Thomas Lantum, GAPIN Ambassador, Nigeria (RILO, NFP GAPIN, Nigeria Customs) Mrs. Animashawun Abimbola Oluwaseyi (frontline airport officer, Nigeria Customs)
Monday, 3/12 Separate meetings, 08:30-12:30 Pierre	Mr. Thomas Lantum (met twice) Mr Bello M. Liman, Comptroller of Customs Mr. Boyi Mohammad, Deputy Comptroller Ms. Lami Jibi-Zim, Assistant Superintendent Mr Dera Nnadi, Modernisation Unit, Nigeria Customs; acting for Customs Desk Officer Bede Anyanwu
15:00-16:00 Pierre	Mr Osei Tutu ECOWAS Commission Secretariat, Acting Director, Community Computer Centre
Tuesday, 0900-1030 11:00-12:30 Pierre	Mr. Dera Nnadi Mr. Fidelis O. Omeni, Deputy Director, Federal Ministry of Environment, Nigeria
4/12, 14:00-15:30 Pierre	Mr. Félix Kwame, ECOWAS Commission Secretariat, Customs and Tourism Directorate

Lusaka, Zambia, GAPIN Debriefing, 6-7 Dec. 2012 (Pierre Fruhling)

Date, Time	Organisation, Person, Title
7 Dec, 1100-1145	Mr. Daniel Moell, WCO
-1145-1230	Ms. Heike Barczyk, WCO
-1230-1315	Ms. Patricia Revesz, WCO
-1715-1800	Ms. Pia Jonsson, CITES

Post-Mission: Telephone, Skype and Email Follow-Up

Week of 10 Dec: email Andrea	Steering Committee Members not interviewed in person: Swaziland, Tanzania, Burundi, Uganda
Week of 10 Dec: email Andrea	National Project Managers not interviewed in person: Swaziland, Tanzania, Burundi, Uganda, Lesotho
Week of 10 Dec Skype Andrea	Ms Sheena Namitala, EAC Regional Programme Manager, Kampala
Week of 10/12: email Andrea	Ms Rosemary Bokang Mokati, Regional Programme Mgr, SACU
Week of 17/12: emails Andrea	Experts Rik van der Wal, Brian Collins, Mats Wiktor: emails
Week 17/12: email Andrea	Christine Msemburi, Regional Office for Capacity Building (ROCG), Nairobi:
Week of 17/12: telephone Andrea	Elke Portz, WCO, Sida Coordinator
Week of 17/12: telephone Andrea	Patrick Dewandre, WCO CFO
Week of 17/12: telephone Pierre	Mr. Richard Chopra, programme manager for the WACAM component, WCO, Brussels
Week of 24/12: telephone Pierre	Mr. John M. Sellar, formerly Head of Enforcement, CITES
Week of 1 Jan, 2013: email Pierre	Ms. Patricia Revesz, WCO Mr. Daniel Moell, WCO

ANNEX C – DOCUMENTS CONSULTED

Documents Reviewed for Columbus Project Evaluation *(not exhaustive list)*

Sida-WCO Columbus Project Documents
Concept Papers and Project Proposals, 2007, 2010, 2012
Sida Assessments (pre-project and annually)
Sida-WCO Agreements
Annual Reports 2009, 2010, 2011, 2012
Financial Reports for same periods
Minutes of Annual Sida-WCO Meetings
Midterm Review Sept 2010
Audit Reports
Sida Statement on Audit Reports
WCO Management Response to Audit Reports
WCO Mitigating Action Plan 2011-2012
Requests for disbursement and approvals for use of unspent funds
Correspondence between Sida and WCO

WCO Project Management
SACU RPM Recruitment Report 2009 (none received for EAC or ECOWAS)
Regional Project Manager (RPM) Contracts
SACU RPM Performance Review (none undertaken for EAC RPM)
Annual Action Plans for the three regions
SACU Communications Strategy
Proposed TOR for SACU National Project Managers (Dec 2012)
EAC PMO Support Staff Duties List
ECOWAS Feb. 2012 Proposal, Risk Management Plan, May 2012 Work Plan, July Progress Report
Minutes of Regional meetings
Press Releases
Mission Reports

Other Organisations' and donors' Trade Facilitation papers and projects (from websites, etc)
Sida, WTO, WCO, UNCTAD, EU, Finland, Norway, DfID, GIZ, US, Japan, African Development Bank, African Union, SADC, COMESA, ECOWAS, CUTS
Readiness Assessment for AEO for SACU, 2010 (USAID consultancy for TKC)
Kenya Customs Modernisation Programme
SARS Customs Modernisation Programme
Columbus Programme Capacity-Building Annual Report, June 2012
WTO Trade Facilitation negotiating text, October 2012
Informal Border Trade, Daniel Njiwa, COMESA, 2012
World Customs Journal (various articles)
World Bank *Doing Business* Indicators, 2012
REC Summit communiqués and other documents
EAC Fourth Development Strategy (2012-16)
Accelerating Implementation of Regional Trade and Transport Facilitation Instruments in Africa (Kitenga & Nyangweso, EAC Secretariat)
EAC NTBs study
RADDEx EAC, USAID Dec 2012
SACU Annual Reports
SACU SAD Manual
SACU Customs Policy
SACU Customs Action Plan 2011-12
Other SACU Customs-related documents
SADC Customs and Trade Facilitation documents
SARS PT/AEO material
TKC AEO materials
WCO AEO Guidelines
ECOWAS WACAM planning documents
Liberia-Ghana assistance planning documents, mission report (Oct 2012)
African Union PIDA Study (Infrastructure Development)

African Union Customs-related meeting minutes, press releases, background documents, etc)
WTO Trade Facilitation documents and case studies, including presentations by many of the countries involved in the Columbus Project

Documents Reviewed for GAPIN Project Evaluation *(not exhaustive list)*

World Customs Organization:
GAPIN PROJECT: WCO Business Case (project proposal to Swedish MFA for the first phase, August 2010)
Customs capacity building in Africa to combat wildlife yields spectacular results (press release, 1 March 2011)
Report on Operation GAPIN (internal document, April 2011)
GAPIN PROJECT: Final Report (report to MFA on the first phase, May 2011)
PROJECT GAPIN: WCO Business Case (project proposal to Swedish MFA for the second phase; Oct/Nov 2011)
Criminals trading in protected wildlife targeted in global Customs enforcement operation (press release, 22 November 2012)

Swedish Ministry for Foreign Affairs:
Bedömnings-PM avseende bidrag till projekt GAPIN (Assessment for decision on GAPIN I funding, 2010-08-16)
Bedömnings-PM avseende bidrag till projekt GAPIN II (Assessment for decision on funding for GAPIN II, 2011-11-17)

CITES:
Elephant conservation, illegal killing and ivory trade (SC62 Doc 46.1; July 2012)

GRASP:
The Last Stand of the Gorilla. Environmental Crime and Conflict in the Congo Basin (with UNEP and INTERPOL, March 2010)

TRAFFIC:
Wildlife law enforcement and CITES. A TRAFFIC briefing document. (March, 2010)
The South Africa-Vietnam Rhino Horn Trade Nexus: A deadly combination of institutional lapses, corrupt wildlife industry professionals and Asian crime syndicates.(August 2012)

United Nations Security Council:
Letter dated 12 October 2012 from the Group of Experts on the Democratic Republic of the Congo (report on the conflict, armed groups and their financing with natural resources, S/2012/843)

US Department of State:
Secretary Clinton Hosts Wildlife Trafficking and Conservation: A Call to Action (press release, November 2012)
Remarks by Secretary Clinton at the Partnership Meeting on Wildlife Trafficking (press release, Nov. 2012)

World Wildlife Fund WWF):
Fighting Illicit Wildlife Trafficking. A consultation with government.(Dahlberg; Dec. 2012)
Dismantling Wildlife Crime (Anita Sundari Akella and Crawford Allan, November 2012.)

ANNEX D – BRIEF ASSESSMENT OF SIDA COLUMBUS PROJECT FINANCIAL REPORTS TO JUNE 2012

(Based on 2008-2012 reports)

	2008			2009			2010-June 2011			July 2011-June 2012			2008-June 2012			2009 Audit report:		Diff
	€	#	€/#	€	#	€/#	€	#	€/#	€	#	€/#	€	#	€/#			
EAC																		
Steering committee	14 297	1	14 297	56 534	3	18 845	59 087	4	14 772	18 428	4	4 607	148 346	12	12 362	Total EAC	171 824	7 070
Workshops				77 012	4	19 253	130 655	9	14 517	193 410	6	32 235	401 077	19	21 109			
Preparations	17 432	3	5 811	31 208	5	6 242	24 366			25 244			98 250					
	31 729			164 754			214 108			237 082			647 673					
SACU																		
Steering committee				8 688	1	8 688	29 631	2	14 816	8 519	1	8 519	46 838	4	11 710			
Workshops	3 487	1	3 487	29 432	3	9 811	18 138	8	2 267	86 781	7	12 397	137 838	19	7 255	Total SACU	46 490	8 370
Tripartite										72 880			72 880					
Preparations							12 684			7 809			20 493					
	3 487			38 120			60 453			175 989			278 049					
ECOWAS																		
Steering committee										2 473			2 473	1	2 473			
Workshops													0					
Tripartite										7 311			7 311					
Preparations										4 999			4 999					
	0			0			0			14 783			14 783					
OTHER REGIONS				100 722			204 350			20 385			325 457			Other regions	96 369	-4 353
Total programme costs	35 216			303 596			478 911			448 239			1 265 962					
ADMINISTRATION																		
4%				13 691			28 826			27 483			70 000			4%	16 041	2 350
EAC RPM				155 068			121 391			144 930			421 389			EAC RPM	87 470	-67 598
SACU RPM							54 600			54 600			109 200					
ECOWAS RPM										34 516			34 516					

Other		5 109	65 743	8 222	79 074	Other	13 108	7 999
	0	173 868	270 560	269 751	714 179			
TOTAL	**35 216**	**477 464**	**749 471**	**717 990**	**1 980 141**	TOTAL	**343 832**	-46 162
Sida disbursements	1 405 266		1 631 544		3 036 810	Bal B/F + fin rev	1 384 860	
Financial revenue		14 809		3 470	18 279	Bal C/F	1 041 028	
Total income					3 055 089			
Balance		907 395	1 789 468	1 074 948	**1 074 948**			
Reported balance		953 558	1 835 631	1 121 111	1 121 111			
Difference		46 163	46 163	46 163	46 163			
Overhead share	0%	57%	56%	60%	56%			
Admin. Surcharge ("4%")								
- as part of programme costs	0%	4,5%	6,0%	6,1%	5,5%			
- as part of all other costs	0%	3,0%	4,0%	4,0%	3,7%			
New overhead calculation, considering 75% of RPM costs as admin and 25% as programme costs								
Programme costs incl 25% RPM	35 216	347 063	546 551	515 677	1 444 507			
Admin costs incl 75% of RPM	0	135 101	226 562	211 240	572 903			
New overhead share of programme costs	0,0%	38,9%	41,5%	41,0%	39,7%			
RPM share of programme costs								
EAC	0,0%	94,1%	56,7%	61,1%	65,1%			
SACU	0,0%	0,0%	90,3%	31,0%	39,3%			
ECOWAS				233,5%	233,5%			

ANNEX E – COMMENT ON WCO MANAGEMENT UNDERTAKINGS

ARTICLE 4 UNDERTAKINGS BY WCO, 2010 Agreement with Sida	Comment
WCO undertakes:	
1. to plan, implement and monitor the programme,	The project has been planned and implemented. Strong commitment demonstrated. However, weaknesses in planning, implementation, monitoring need to be addressed .
2. to provide resources as specified in this Agreement, particularly provide resources for and/or cover the costs related to the successful implementation of the programme,	WCO facilitated excellent technical experts and back-up resources.
3. to provide the necessary professional and administrative support, personnel services and any other resources required for the successful implementation of the programme,	Partially achieved. Weaknesses to be addressed in these areas.
4. to ensure that both WCO's internal control systems of project resources, and the availability of administrative capacity, are adequate to handle Sida's contribution, and	The internal control systems and administrative capacity were inadequate. Weaknesses are being addressed.
5. to fulfil the following obligations during programme implementation:	
encourage maximum ownership and commitment to the programme on the part of the Customs administrations involved, as manifested for example in the allocation of human resources and other types of support for the implementation of the project	Effectively secured ownership and commitment of Customs Directors and many officers. However, much more work remains to be done to secure 'maximum' ownership and commitment at both higher and lower levels of Customs administrations
involve other stakeholders (DGs Customs, business community, WCO's Regional Offices for Capacity Building, Regional Economic Communities, and donors) in the scoping, development and implementation phases	DGs of Customs participated, but the other stakeholders mentioned have been involved only marginally.
address the coordination of donors currently working in the region through facilitating a platform for cooperation opportunities between Customs authorities and development partners	The one donor meeting held in Mauritius in early 2012, and the WCO web platform, have not led to better coordination on the Sida Columbus Project. This is also a priority issue, since fragmented donor activities delay achievement of the Project objectives.
take into account gender issues as regards women's participation in target groups and selection criteria, and skills development opportunities	Women are heavily involved in SACU and EAC activities. Much less so in ECOWAS activities.
ensure that a proper results-based management system that will measure results against expected outcomes is in place	RBM weaknesses are being addressed.
to ensure that the implementation of the programme shall be organised as described the Project Proposal.	Most of the project implementation followed the Proposals. However, in key management matters, this was not always the case. Better monitoring required.

Review of Swedish Support to the World Customs Organization (WCO) Capacity Building, 2008-2012

This report evaluates Sweden's assistance since 2008/10 to three World Customs Organisation (WCO) projects in sub-Saharan Africa, and one project combatting trade in endangered wildlife.

The Sida-funded customs reform projects were among the WCO's first major capacity-building endeavours, and many lessons have been learned. The Review concluds that while the Southern and Eastern Africa projects were progressing in the right direction, important issues needed to be addressed if the desired results were to be attained and sustained.

Recommendations for all three projects focuses on the need for comprehensive analysis and needs assessment, results-oriented strategic planning and performance management, more effective project structure, and communications and stakeholder relations, including donor coordination.

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