



Evaluation of the Sub-Programme on Chemicals and Pollution Action (SP-CPA) 2015-2024

Janet Wildish

Director, Evaluation Office

(Consultant: Dr Toolseeram Ramjeawon; Evaluation Manager: Cecilia Morales)

March 2026

Methodology

Mixed-Methods approach

Semi-structured interviews / Focus Groups

56 people interviewed across UNEP, UN organizations, CPR, Donors, NGOs, etc.

Portfolio Analysis

81 active projects (GEF and non-GEF)

Analysis of Project Evaluations

36 completed evaluations

Case Studies Analysis

11 case studies

Document review

MTS , PoWs, PPRs, Quarterly Reports, Annual Reports; Analytical assessments and others

Areas of focus

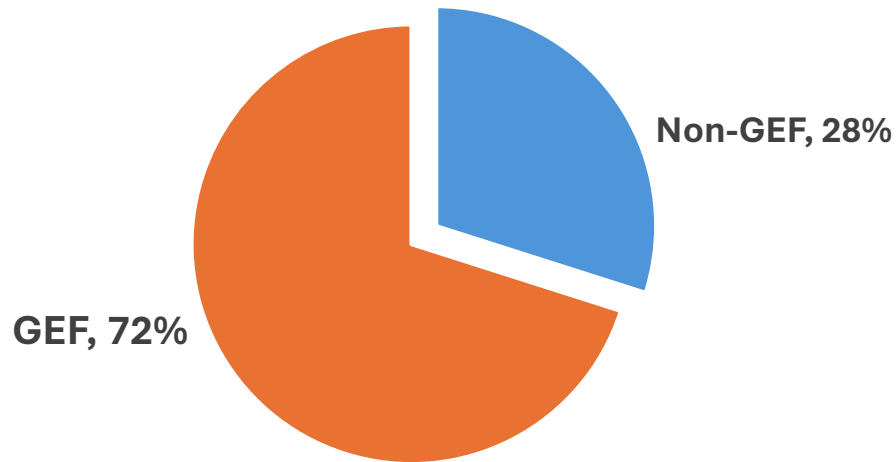
- I. Strategic relevance
- II. Coherence of the design and structure
- III. Meta-analysis of project-level performance
- IV. Performance at sub-programme level
- V. Factors affecting sub-programme performance

Includes 11 strategic questions cutting across these five areas of focus

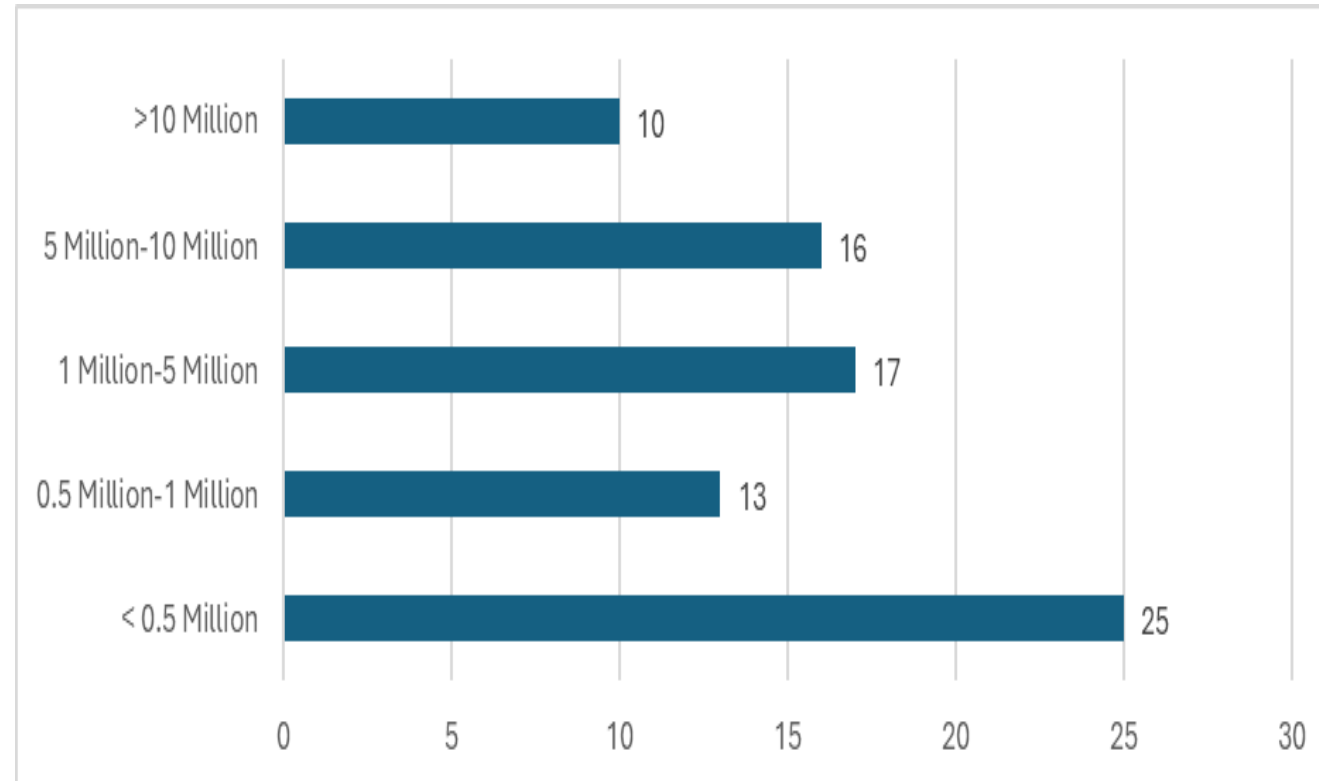
SP-CPA Portfolio

- There were **81 active projects** in the portfolio at 31st December 2024.
- **54 projects were completed** during the period 2015-2024. **36** of these have **completed evaluations**.
- 66 (81%) of the active projects are funded by GEF. Nearly 88% of these projects are led by Industry and Economy Division.

Total Budget Value of Active Projects USD 320 Million

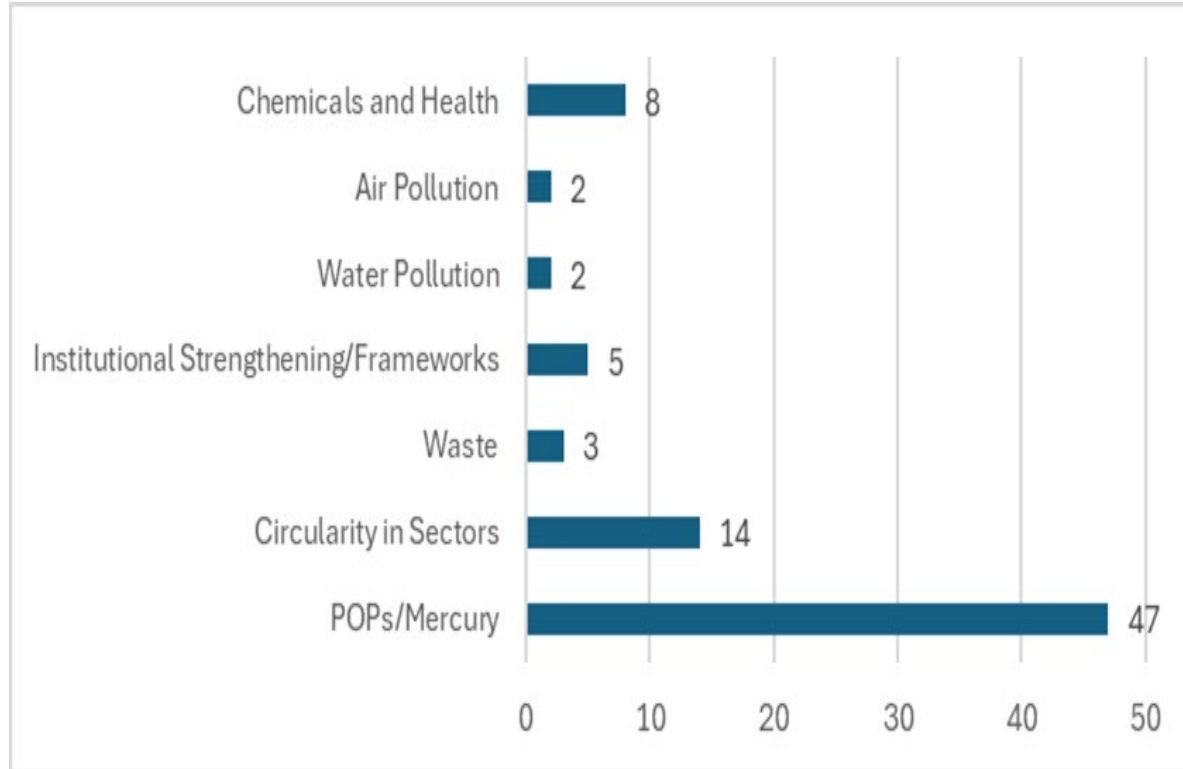


Budgets

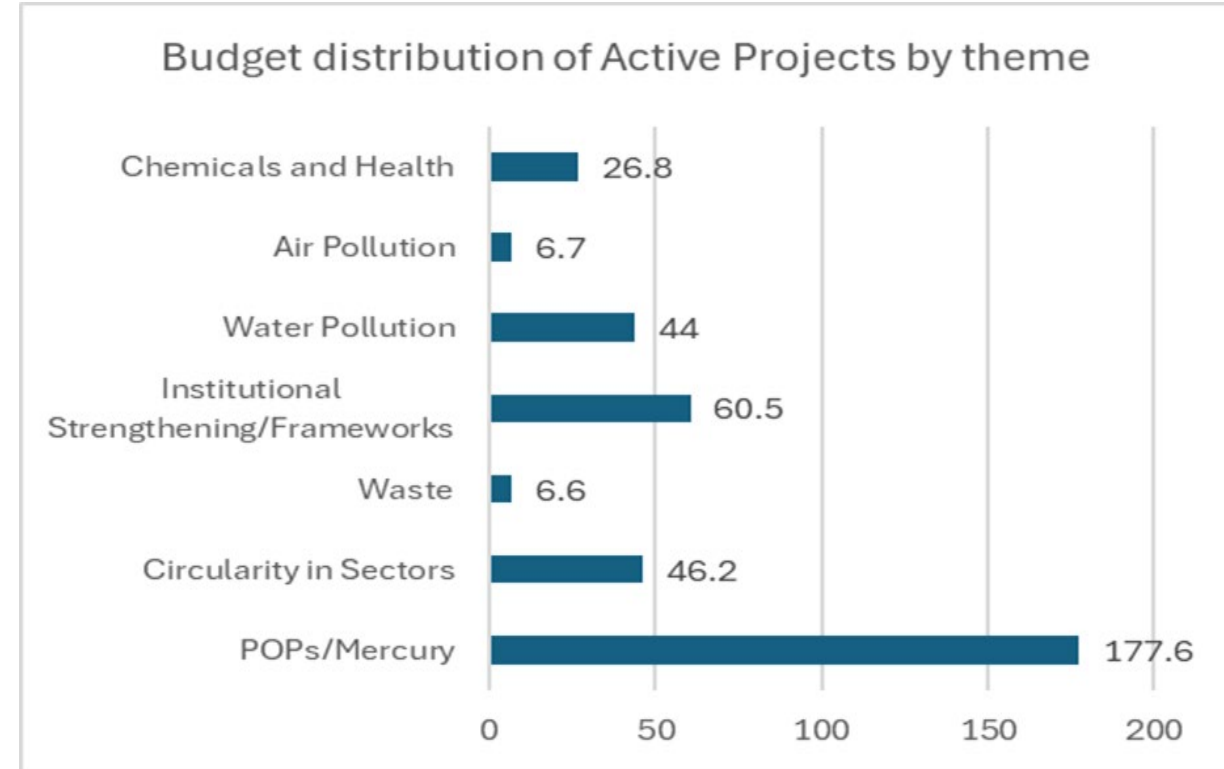


SP-CPA Portfolio (Cntd)

Portfolio -Project Distribution By Theme

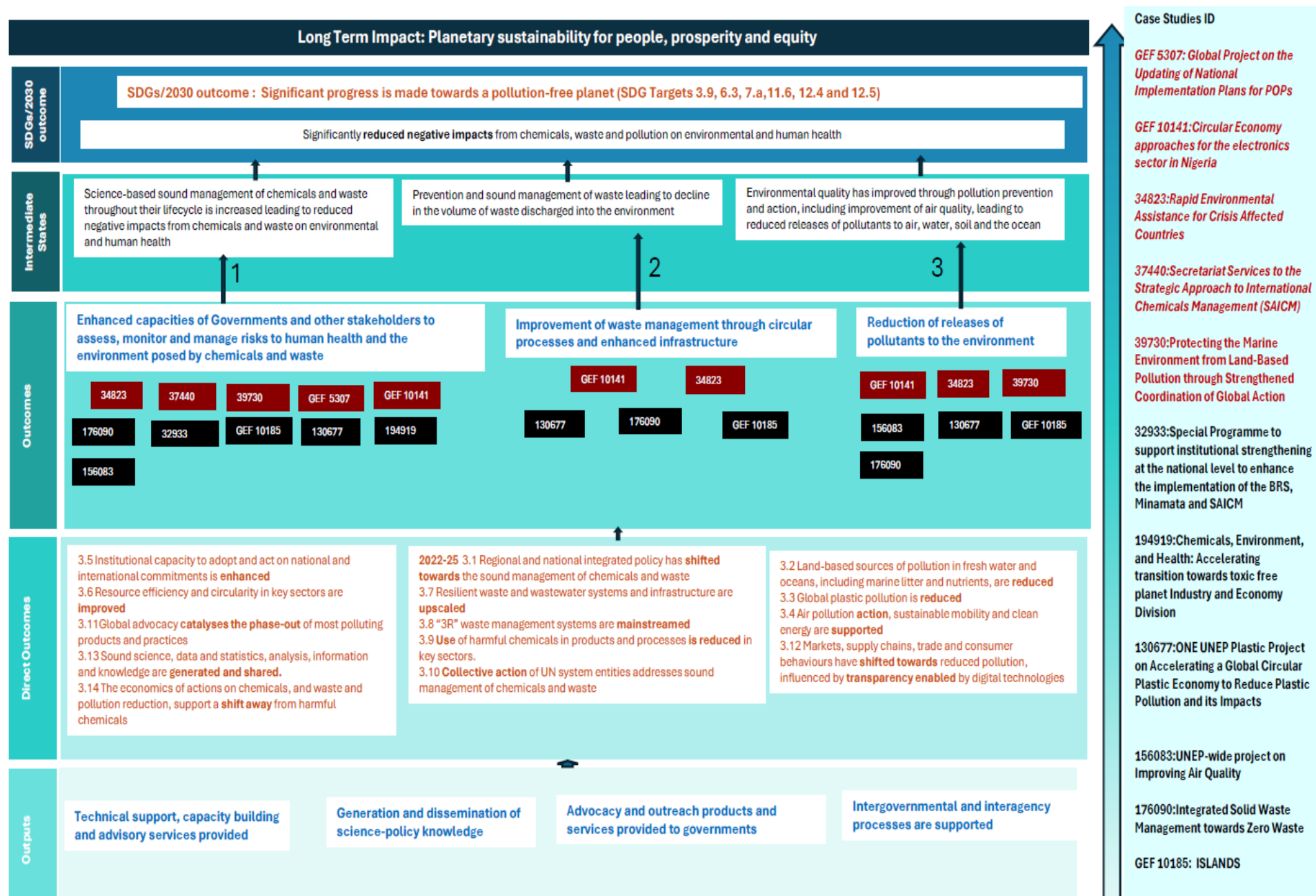


Portfolio- Budget Allocation By Theme



- A diverse thematic spread but concerns over 'fragmentation' (47% projects < USD 1m)
- Multiple small projects funded by GEF are tied to specific treaty obligations. However, the overall SP-CPA portfolio also includes larger, cross-sectoral initiatives that are integrated under UNEP's high-impact sector approach, reflecting a shift toward fewer, more programmatic interventions
- Profile of Freshwater/Marine Pollution in the portfolio of CPA is weak (*balance country interests, env needs and donor resource focus*)

Strategic Evolution Map and Causal Pathways



Strategic evolution of the SP-CPA

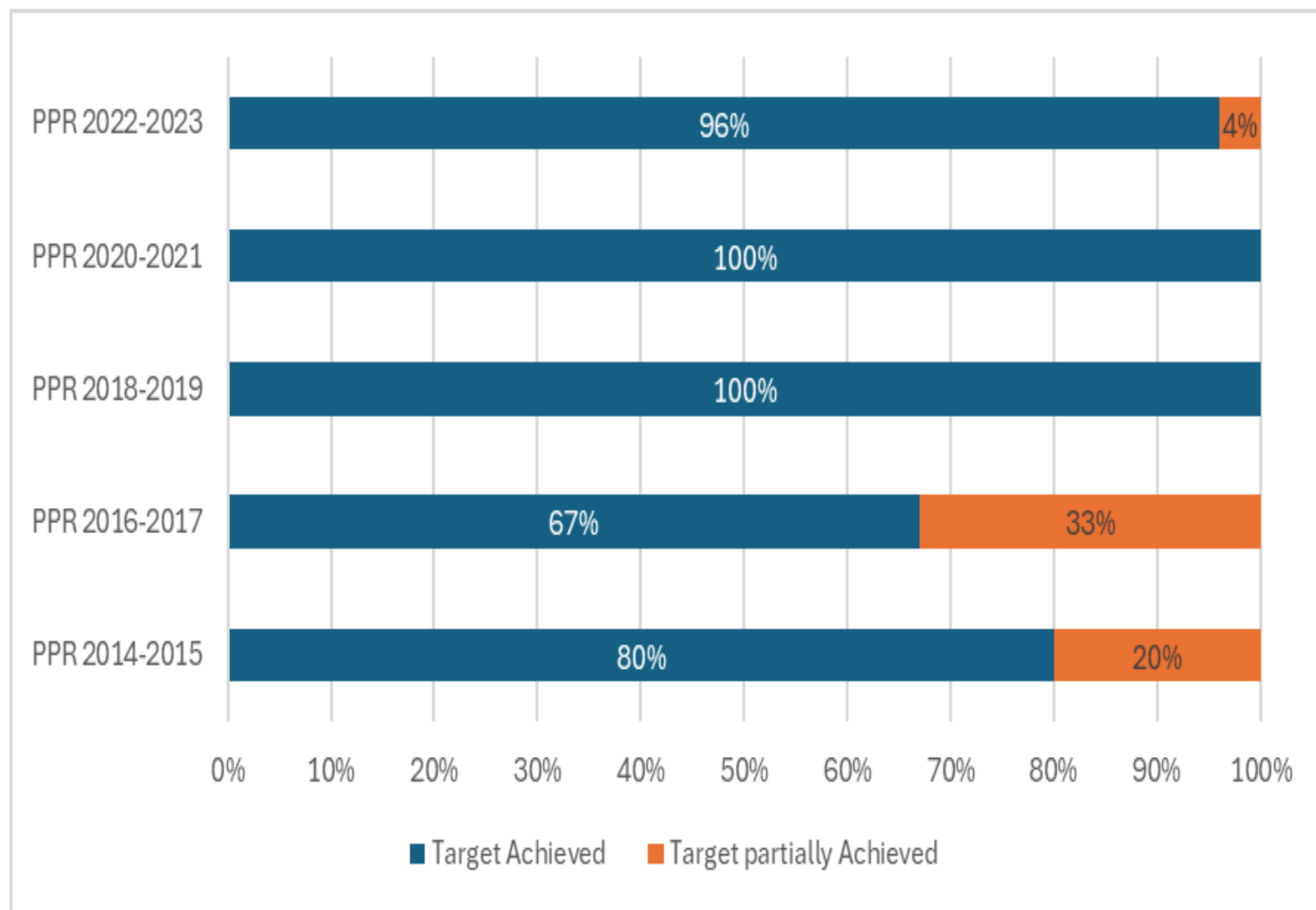
MTS 2014–17: Chemicals and Waste (chemical-by-chemical approach)

MTS 2018–21: Chemicals, Waste, Air Quality (introduced air quality and SDG alignment)

MTS 2022–25: Chemicals and Pollution Action (triple planetary crisis framing and emphasizing circularity)

- **Thematic evolution reflects global environmental complexity and an adaptive response to emerging crises.** However, the overall strategic objectives have remained consistent and aspirational.
- **A gradual shift from a chemical-by-chemical focus (e.g., Mercury, POPs) to a sectoral safety/integrated approach.** Also, an increasing emphasis on circularity and Life Cycle Management.
- **A gradual shift towards fewer/ larger projects on high-impact sectors of the economy.** But the portfolio still lags behind the strategy because of legacy projects (*and donor interests*).
- MTS reform; New Delivery Model; PCPs; Planetary funds.....all point to a **system that is evolving** but not yet optimized.

Overall Subprogramme performance in the POWs



SP-CPA: indicators of achievement (PPRs 2014-2023)

SP target achievements according to PPR is highly satisfactory.

Indicators are, however, rather broad. Comparatively easy for a project to report on these indicators and comparatively easy for the SP to give an aggregated indicator measurement across all projects.

The structure (MTS :4 years) favors output tracking and not of outcomes/impacts. UNEP's normative role yields long-term results, and there is a lack of mechanisms to capture post-project impacts.

Where has the work of the SP-CPA been most impactful?

- **Normative leadership.** Played a pivotal role in convening diverse stakeholders on global agreements (Minamata), global frameworks (SAICM/GFC) and leveraging impact through a large range of partnerships with private sector engagement.
- Good support given to countries for the relevant **MEAs** through GEF funded Projects.
- Raising the visibility of **life cycle thinking and circularity**.
- The marine litter/plastic pollution groundwork has significantly influenced UNEA resolutions (e.g. UNEA resolution 5/14).
- Growing **integration of environment and health**....e.g. the work on air quality and AMR.
- **Some impactful projects:** Special Programme, Rapid Environmental Assessments for crisis affected countries, Secretariat services to SAICM/GFC; GEF enabling projects to meet commitments on MEAS.

Strategic Questions Findings

- **Collaborations with MEAs have been highly productive, especially in aligning norms, convening stakeholders, and delivering treaty obligations through GEF-funded initiatives.** Early project review by the BRS Conventions Secretariat improved coherence and MEA relevance, enhancing project quality. However, non-GEF projects are less systematically linked to MEAs, reducing unified strategic impact.
- **UNEA resolutions are strategically embedded in the SP-CPA and have driven major initiatives such as the such as the ongoing negotiations on 5/14.** However, operational integration remains inconsistent due to fragmented portfolios, weak field presence, and underrepresentation of certain topics. These resolutions have also expanded UNEP's mandate, requiring coverage of a wide array of themes without proportional increases in funding or staff capacity.
- **SP-CPA's influence on UNDS processes is limited, with pollution issues underrepresented in CCAs and UNSDCF.** Weak in-country presence and technical language barriers hinder mainstreaming into national frameworks. Greater institutional engagement, clearer messaging, and regional empowerment are needed to increase influence.

Conclusions 1 - Subprogramme

- UNEP's strategic shift to make "a pollution-free planet" one of its three primary objectives has **positively impacted the SP by increasing its visibility.**
- **Project level performance is Satisfactory on the average.** The achievements of the targets by the SP is highly satisfactory...but the target indicators are broad.
- **The SP has leveraged significant extrabudgetary resources with GEF.** Mutual influence ...GEF has influenced UNEP's work on the MEAs while UNEP has influenced the GEF strategy on high impact sectors. (*GEF internal execution issue*)
- **The GFC (and the future Science/Policy Panel) allows UNEP to evolve the MTS and the SP portfolio to an approach** that looks at whole supply chains and bring in science and industry to ensure sectors are safe and sustainable, and can connect divisions and subprogrammes.

Conclusions 2 - Division

- **The work on circular economy is fragmented across units/divisions.** Many interviewees have indicated need for a clear, unified CPA narrative that describes UNEP's work on CPA, tying pollution, health, circular economy, environmental justice, etc. together.
- **The subprogramme is closely aligned with the Division and mechanisms for cross-divisional collaboration are weak.**
 - No subprogramme board/steering cttee that provides strategic oversight and decision-making support
 - Teams operate in silos
 - Lack of empowerment of the GSPC for delivery of the work across units/branches/divisions
 - No institutionalization of the coordination between GSPCs
 - No system for tracking synergies across subprogrammes
 - Lack of funding mechanisms to promote joint/cross-pillars delivery
- While there is increasing alignment at a strategic level between IED and GEF, **IED needs more alignment within its own internal structure.** Scope for better integration of the work of the GEF unit with the broader division to pool resources, consolidate expertise and create more programmatic interventions.

Conclusions 3 – UNEP/MTS

- **Lack of mechanisms/tools to capture post-project impacts** and maintain UNEP's visibility in successful outcomes. Four-Years MTS cycles are too short to observe impacts.
- **Indicators are broad**, do not incentivize ambition in the projects, making accountability difficult. Need better indicators that are specific and sectoral.
- **Future MTS to be realistic.** Strategic choices to align ambitions with funding...fewer/larger more strategic initiatives with blended finance to have an integrated response and more impact.
- **Lack of strategic clarity on the balance between normative and operational work...**a stronger national delivery role will affect staffing, budgeting and overall strategy.
- **Need for a proper functional analysis of Regional Offices and assessment of their capacities.**
- **Need for an established accountability framework for treating country requests through Regional Offices in the Divisions.**

Recommendation Areas

R1: Strengthen Strategic Continuity (*and impact indicators*) Across MTS Cycles

R2: Strengthen SP-CPA Strategic Coherence and Internal Coordination Mechanisms

R3: Strengthen Focused Portfolios, Knowledge Systems and (*address*) Resourcing Gaps

R4: Catalyse Green & Circular Markets

R5: Elevate Visibility & Political Salience of the Pollution Agenda

The evaluation notes that UNEP management had already identified many of the challenges highlighted in this assessment and had begun implementing corrective measures during the latter part of the evaluation period. These reforms reflect a deliberate shift toward stronger technical capacity, greater programmatic integration, and enhanced institutional coherence