

**Validated Terminal Review of the UNEP-GEF Project
'Establishing the National Framework and
Operational Capacity for Implementing the Nagoya
Protocol in Timor-Leste' (GEF ID 9703)**

2018 – 2024



UNEP Ecosystems Division

Validation date: July 2026



This report has been prepared by an external consultant as part of a Terminal Review, which is a management-led process to assess performance at the project's operational completion. The UNEP Evaluation Office provides templates and tools to support the review process and provides a formal assessment of the quality of the Review report, which is provided within this report's annexed material. In addition, the Evaluation Office formally validates the report by ensuring that the performance judgments made are consistent with evidence presented in the Review report and in-line with the performance standards set out for independent evaluations. As such the project performance ratings presented in the Review report may be adjusted by the Evaluation Office. The findings and conclusions expressed herein do not necessarily reflect the views of Member States or the UN Environment Programme Senior Management.

AI tools (ChatGPT) were used to transcribe interviews and for executive summary. The consultant has reviewed the AI-generated content and takes full responsibility for its accuracy and application.

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Establishing the National Framework and Operational Capacity for Implementing the
Nagoya Protocol in Timor-Leste
GEF ID: 9703
05/2026
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ACKNOWLEDGEMENTS

This Terminal Review was prepared for the Ecosystems Division, Biodiversity and Land Branch by Vincent LEFEBVRE.

The reviewer would like to express his gratitude to all persons met and who contributed to this review, as listed in Annex III.

The reviewer team would like to thank the project team and in particular Mr Francisco da Costa Araujo and Mr. Ali Budhi Kusuma for their contribution and collaboration throughout the review process. The reviewer would also like to thank all the sectoral focal points including from the Biodiversity Division for their time in discussing both the constraints and achievements of this project.

The review consultant hopes that the findings, conclusions and recommendations will contribute to the successful finalisation of the current project, formulation of a next phase and to the continuous improvement of similar projects in other countries and regions.

Thanks are extended to Kavita Sharma (UNEP Task Manager), Rachel Kagiri (UNEP Fund Management Officer) and Arshad Hussain (UNEP overall FMO) for their continuous support and guidance.

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ABOUT THE REVIEW

Joint Review: No

Report Language(s): English.

Review Type: Terminal Review

Brief Description: This report is a management-led Terminal Review of a UNEP/GEF project implemented between 2019 and 2024. The project's overall goal was to establish the national legal framework and operational capacity for implementing the Nagoya Protocol in Timor-Leste, thereby enabling sustainable access to genetic resources and ensuring fair benefit-sharing. The review sought to assess project performance (in terms of relevance, effectiveness and efficiency) and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The review has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote learning, feedback, and knowledge sharing through results and lessons learned among UNEP, the GEF and the relevant agencies of the project's participating country.

Key words¹: Access and Benefit Sharing, ABS, Nagoya Protocol, Timor-Leste, Genetic Resources, Traditional Knowledge, Bioprospecting, Biodiversity Database, Capacity Building, Environmental Governance

Source(s) of Funding by Country: GEF funding and co-financing from the government of Timor Leste (Ministry of Tourism and Environment).

Source(s) of Funding by Institution Type:

Foundation/NGO	No
Private Sector	No
UN Body	No
Multilateral Fund	No
Environment Fund	Yes

Primary data collection period: 8th of October 2025 – 25th of January 2026

Field mission dates: 8 to 13 December 2025

¹ Please provide maximum five key words, which are not already in the project title.

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LIST OF ACRONYMS

Acronym	Definition
ABS	Access and Benefit Sharing
BRIN	National Research and Innovation Agency (Indonesia)
BSAs	Benefit-Sharing Agreements
CBD	Convention on Biological Diversity
CHM	Clearing-House Mechanism
CI	Conservation International
CNA	Competent National Authority
EA	Executing Agency
EOU	Evaluation Office (UNEP)
EU	European Union
FGD	Focus Group Discussion
FPIC	Free, Prior and Informed Consent
GEF	Global Environment Facility
GHG	Greenhouse Gas
GIS	Geographic Information Systems
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (German development agency)
GR	Genetic Resources
HF	Highly Favourable (rating)
HL	Highly Likely (rating)
HQ	Headquarters
HRBA	Human Rights-Based Approach
HS	Highly Satisfactory (rating)
HU	Highly Unsatisfactory (or Highly Unfavourable/Unlikely) (rating)
HYR	Half-Yearly Report
ILCs	Indigenous and Local Communities
IPBES	Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services
M&E	Monitoring and Evaluation
MAF	Ministry of Agriculture and Fisheries (Predecessor to MALFF)
MAGNT	Museum and Art Gallery of the Northern Territory (Australia)
MALFF	Ministry of Agriculture, Livestock, Fisheries and Forestry
MAT	Mutually Agreed Terms
MDIR	Ministry of Development and Institutional Reform
MEA	Multilateral Environmental Agreement
MNEC	Ministry of Foreign Affairs (Ministério dos Negócios Estrangeiros e Cooperação)
MoA	Memorandum of Agreement
MoH	Ministry of Health
MS	Moderately Satisfactory (rating)
MSP	Medium-Sized Project
MTCI	Ministry of Tourism, Commerce and Industry
MTE	Ministry of Tourism and Environment
MTR	Mid-Term Review
MTS	Medium Term Strategy (UNEP)
MU	Moderately Unsatisfactory (rating)
NAP	National Adaptation Plan

NBSAP	National Biodiversity Strategy and Action Plan
NCE	No-Cost Extension
NDB	National Directorate for Biodiversity
NGO	Non-Governmental Organisation
NGS	Nimura Genetic Solutions
PCA	Project Cooperation Agreement
PIC	Prior Informed Consent
PIR	Project Implementation Report
PMC	Project Management Costs
PMU	Project Management Unit
POW	Programme of Work (UNEP)
ProDoc	Project Document
PSC	Project Steering Committee
QER	Quarterly Expenditure Report
S	Satisfactory (rating)
SSFA	Small-Scale Funding Agreement
SSE	Secretary of State for the Environment
TBD	To Be Determined
TK	Traditional Knowledge
TM	Task Manager
ToC	Theory of Change
ToR	Terms of Reference
U	Unsatisfactory (rating)
UNDIL	University of Dili
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
UNPAZ	University of Peace
UNTL	National University of Timor-Leste
USD	United States Dollar

PROJECT IDENTIFICATION TABLE

GEF Project ID/SMA ID ² :	GEF ID: 9703; SMA ID: 40209		
Type of GEF Project:	Child: N	Global Coordinating Project:	N
	If yes, provide GEF Programme ³ ID:	Medium-Size Project or Full-Size Project:	MSP
UNEP Management (Division/Branch/Unit):	UNEP Ecosystems Division/ Biodiversity and Land Branch/ GEF Biodiversity and Land Degradation Unit.	Executing Agency: (indicate if internally executed):	National Directorate for Biodiversity (NDB), Directorate General for Environment, Ministry of Tourism and Environment
Sources of Funding (Co-finance):	Country ⁴ (ies): Timor Leste	Institution ⁵ Name/Type: Ministry of Tourism and Environment	
Relevant SDG(s):	Goal 2: Zero hunger Target 2.5: <i>By 2020, maintain the genetic diversity of seeds, cultivated plants and farmed and domesticated animals and their related wild species, including through soundly managed and diversified seed and plant banks at the national, regional and international levels, and promote access to and fair and equitable sharing of benefits arising from the utilization of genetic resources and associated traditional knowledge, as internationally agreed.</i> Goal 3: Good health and well-being Target 3.3: <i>By 2030, end the epidemics of AIDS, tuberculosis, malaria and neglected tropical diseases and combat hepatitis, water-borne diseases and other communicable diseases</i> Goal 9: Industry, innovation and infrastructure Target 9.b: <i>Support domestic technology development, research and innovation in developing countries, including by ensuring a conducive policy environment for, inter alia, industrial diversification and value addition to commodities.</i> Goal 14: Life below water Targets 14.2		

² SMA refers to the ID provided by the Integrated Planning, Management and Reporting Solution (IPMR) system, which was introduced by UNEP in July 2023. Previously, it was referred to as a PIMS ID number.

³ GEF Programme refers to 'Parent' project.

⁴ Where applicable, list countries who have provided project funds and/or co-finance.

⁵ Indicate where funding institutions are any/all of the following: Foundation/NGO; Private Sector; UN Body; Multilateral Fund; Environment Fund.

	<i>By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration to achieve healthy and productive oceans.</i> Targets 14.a <i>Increase scientific knowledge, develop research capacity and transfer marine technology, considering the Intergovernmental Oceanographic Commission Criteria and Guidelines on the Transfer of Marine Technology, in order to improve ocean health and to enhance the contribution of marine biodiversity to the development of developing countries, in particular small island developing States and least developed countries.</i> Goal 15: Life on land Targets: 15.5 <i>By 2030, ensure the conservation of mountain ecosystems, including their biodiversity, to enhance their capacity to provide benefits that are essential for sustainable development.</i> Target 15.6 <i>Promote fair and equitable sharing of the benefits arising from the utilization of genetic resources and promote appropriate access to such resources, as internationally agreed.</i>		
MTS (at approval):	UNEP Medium Term Strategy 2022-2025		
POW Direct Outcome(s) number/reference ⁶ (applicable for projects approved from 2022): OR POW Output(s) number/reference ⁶⁶ (applicable for projects approved pre-2022)	POW Direct Outcome: Nature 2(i) Number of national or subnational entities that, with UNEP support, adopt integrated approaches to address environmental and social issues and/or tools for valuing, monitoring and sustainably managing biodiversity. Direct outcome: 2A, 2B.	MTS 2025 Outcome(s) number/reference ⁶⁶ (applicable for projects approved from 2022): OR POW Expected Accomplishment(s) number/reference ⁶⁶ (applicable for projects approved pre-2022):	MTS 2025 Outcome: 2A: An economically and socially sustainable pathway for halting and reversing the loss of biodiversity and ecosystem integrity is established. 2B: Sustainable management of nature is adopted and implemented in development frameworks.
	POW Output:		POW Expected Accomplishment:
Sub-programme:	Nature Action	Programme Coordination Project (if relevant):	Environmental Governance
UNEP approval date:	2019.05.07	GEF approval date:	2018.08.07

⁶ For these items do not include full text; only enter the number or reference.

GEF Operational Programme/Cycle # (e.g. GEF-7):	GEF-7	GEF Strategic Priority (e.g. BD4):	Biodiversity
Focal Area(s):	Biodiversity		
Expected start date ⁷ :	2018.08.07	Actual start date: ⁸	2019.08.16
Planned completion date ¹⁷ :	2024.12.31	Actual operational completion date:	2024.12.31
Planned project budget at approval:	GEF grant allocation: 1,319,863		
	Expected co-financing: Cash: 800,000 In-kind: 3,250,000		
	Total planned budget: 5,369,863		
Actual expenditures reported (cash only):	GEF grant expenditures reported as of December 2024: 1,269,863		
	Actual co-financing 2024.12.31: 956,539 (all in-kind)		
	Total actual expenditures reported as of 2024.12.31: 2,226,402		
No. of formal project revisions:	None	Date of last approved project revision:	N/A
No. of Steering Committee meetings:	4	Date of Last Steering Committee meeting:	2024.01.17
Mid-term Review/ Evaluation ⁹ (required or not required):	UNEP requirement:	☒	Mid-term Review/ Evaluation actual date: 2023.03.31
	GEF requirement:	☒	
Terminal Evaluation (planned date):	2025.06.30	Terminal Evaluation actual date:	2025.10.08
Coverage - Country(ies):	Timor Leste	Coverage - Region(s):	South-East Asia
Dates of previous project phases:	n/a	Status of future project phases:	n/a

Table 1 Project Identification Table

⁷ Expected/planned dates are listed in the Project Document (ProDoc).

⁸ Actual start date is the date of the last signature on the PCA or ICA.

⁹ UNEP projects of four or more years duration require an MTR unless there is an exceptional circumstance. See the *Evaluation in the Project Cycle* section in the [Evaluation Office's operational manual](#). Donor requirements may vary and should be considered in conjunction with UNEP's requirements.

EXECUTIVE SUMMARY

Project background

1. The project "Establishing the National Framework and Operational Capacity for Implementing the Nagoya Protocol in Timor-Leste" (GEF ID 40209) was implemented in Timor-Leste with USD 1,319,863 in funding from the Global Environment Facility (GEF) Trust Fund and USD 4,050,000 in planned co-financing from the Government of Timor-Leste and partners. The project was implemented between August 2019 (actual start) and December 2024 (operational completion), following two no-cost extensions that extended the duration by 24 months to compensate for delays caused by the COVID-19 pandemic and political restructuring.
2. The rationale for the project was to address long-standing structural gaps in Timor-Leste's capacity to regulate access to genetic resources. Despite being situated in the biodiversity-rich Wallacea region, the country lacked a coherent legal and institutional framework for Access and Benefit-Sharing (ABS), leaving it vulnerable to biopiracy and unable to capture economic benefits from its genetic assets. Its objective was to establish the conditions enabling sustainable access to the genetic resources of Timor-Leste, which will deliver fair and equitable benefits to its people, while protecting legal and customary ownership and traditional knowledge. The project intervention logic was structured around two components: Component 1 focused on the "soft" enabling environment (legal frameworks and capacity building), while Component 2 focused on "hard" technical operationalisation (databases, laboratories, and bioprospecting pilots).

This Review

3. The review sought to assess project performance (in terms of relevance, effectiveness and efficiency) and determine the sustainability of its results. It assesses performance against nine review criteria and assigns a score from a six-point scale ranging from Highly Satisfactory to Highly Unsatisfactory. The review has two primary purposes: accountability to the GEF and UNEP and learning to inform future biodiversity governance initiatives.
4. Data collection methods included a mixed-methods approach prioritising qualitative inquiries. The review was conducted between October 2025 and January 2026, with a field mission to Dili from 7–13 December 2025. Data collection involved in-depth interviews with key stakeholders (Government agencies, UNEP, Conservation International, and academic partners), selected representatives from project sites, and a comprehensive document review. Data analysis was based on applying crosschecked data to assess performance against a Reconstructed Theory of Change (RoToC) and its causal pathways, specifically examining the transition from technical outputs to institutional outcomes. Limitations included the inability to visit remote pilot sites in Larisula and Macadade due to time constraints, which was partly mitigated by interviewing field intermediaries and verifying digital evidence of community engagement.

Key findings

5. The project has demonstrated Highly Satisfactory performance in Strategic Relevance and Satisfactory performance in Effectiveness regarding the delivery of "soft" infrastructure. It successfully established the sector from scratch, filling a critical regulatory void that had previously left Timor-Leste vulnerable to biopiracy. Key technical achievements include:

- Legal framework: the project delivered 100% of the required legal instruments, including the "Ratification Package" (Draft Law, Decree, and Technical Guidelines) translated into Tetum and Portuguese to ensure local appropriation.
 - Data sovereignty: it established the National Biodiversity Database and ABS Clearing-House, effectively "repatriating" data sovereignty by consolidating over 5,000 biological records previously held in dispersed international collections (e.g., in Portugal, the Netherlands, and Indonesia).
 - Community rights: the project successfully piloted the country's first Bio-Community Protocols in Larisula and Macadade. These protocols operationalised Free, Prior and Informed Consent (FPIC), including documenting women's unique roles as custodians of Traditional Knowledge (e.g., medicinal plants) and ensuring intellectual property rights are protected in future commercial negotiations.
 - Adaptive management: the project demonstrated remarkable resilience by recovering from a "Moderately Unsatisfactory" mid-term status. This turnaround was driven by a strategic pivot to south-south cooperation; responding to administrative delays with Australian partners, the PMU engaged the Indonesian Research Agency (BRIN). This partnership proved far more effective due to shared ecological characteristics and cultural compatibility, accelerating technical transfer in the final 18 months.
6. Areas that would benefit from further attention are Financial Sustainability and "Hard" Infrastructure, which were rated as Unlikely and Moderately Unsatisfactory respectively.
 7. The Review identified three critical bottlenecks preventing full project impact:
 - The "Digital Cemetery" risk: While the digital platforms are technically operational, the project closed without securing a recurrent state budget for web hosting and domain renewal. Without an immediate commitment from the Ministry, there is a high risk these assets will go offline, becoming a "digital cemetery", technically perfect but inaccessible.
 - Laboratory failure: the project failed to operationalise the National Biodiversity Laboratory. Despite available funding, systemic procurement failures and vendor non-performance meant the facility remained unequipped (lacking essential cabling and analytical instruments) at closure. This leaves the country dependent on expensive foreign analysis for bioprospecting, undermining the goal of technical autonomy.
 - The "Missing Middle": a major institutional disconnect remains. While the technical tools (laws, forms, databases) are ready, the Nagoya Protocol remains unratified by Parliament. This renders the entire ABS regime legally dormant ("a missing middle"); technical staff are trained but legally prohibited from issuing permits or enforcing benefit-sharing, creating a "capability trap" where readiness outpaces political authorisation.

Table 2: Summary of project ratings

Criterion	Rating
Strategic Relevance	Highly Satisfactory
Quality of Project Design	Moderately Satisfactory
Nature of External Context	Unfavourable
Effectiveness	Satisfactory
Financial Management	Moderately Unsatisfactory
Efficiency	Moderately Satisfactory
Monitoring and Reporting	Satisfactory

Criterion	Rating
Sustainability	Unlikely
Factors Affecting Performance	Moderately Satisfactory
Overall Project Performance Rating	Moderately Satisfactory

Conclusions

8. Overall, the project performed at the **Moderately Satisfactory** level. The main achievements of the project were the establishment of the National Biodiversity Database and ABS Clearing-House, which effectively "repatriated" data sovereignty by consolidating records previously held in international collections. Additionally, the project finalised the complete "Ratification Package" (Draft Law and Decree) and developed four bioprospecting prototypes (e.g., Aimuro mouthwash), providing a tangible "proof of concept" for the economic value of genetic resources. The project successfully created a reservoir of national capacity by embedding ABS curricula into national universities (UNTL, UNDIL), ensuring a lasting legacy of awareness.
9. The strongest performing aspects were the project's resilience through adaptive management. Following a stagnation period (2020–2022) caused by COVID-19 and leadership vacancies, the project utilised a "compression strategy" and South-South partnerships to deliver results in its final phase. Another strong aspect was the innovative "defensive protection" strategy for Traditional Knowledge, where sensitive data was archived in offline booklets to protect community rights in the absence of a legal framework. Comparative weaknesses were apparent in Financial Management and Sustainability. The project failed to secure recurrent state budgets for digital assets, creating a "Digital Cemetery" risk where databases may go offline post-project. Institutional sustainability is compromised by the failure to operationalise the laboratory and the continued delay in legislative ratification, which risks creating a "capability trap" where trained staff are legally prohibited from acting.
10. There were 4 key strategic questions:
 - While the project successfully delivered all technical and operational requirements to implement the Nagoya Protocol—including a comprehensive "Ratification Package" and the establishment of the Competent National Authority - it failed to secure parliamentary ratification. This leaves the entire ABS framework legally dormant.
 - National capacities saw significant improvements in informational and individual skills, most notably through the creation of the country's first National Biodiversity Database and the integration of ABS curricula into local universities. However, "hard" systemic capacity remains constrained because the National Laboratory could not be fully operationalised.
 - Pathways for long-term sustainability are currently at risk. Institutional and financial viability remain unlikely without secured state budgets for maintaining digital assets like web hosting and laboratory consumables, a situation compounded by fragile high-level political ownership.
 - Project performance was negatively impacted by political instability, ministerial turnover, and severe infrastructure deficits such as a lack of reliable internet and electricity. Conversely, adaptive management and a strategic pivot to South-South cooperation with the Indonesian Research Agency (BRIN) were critical positive drivers. Key lessons for future initiatives include decoupling technical delivery from political processes to prevent "capability traps," and prioritising resilient, low-tech infrastructure solutions

Lessons Learned

11. Lesson 1: dedicated technical expertise embedded within the Project Management Unit (PMU) is a critical prerequisite for specialised biodiversity projects. The project stagnated when relying on administrative coordination alone. The turnaround was driven by a dedicated Technical Specialist who could bridge the gap between scientific requirements and administrative processes
12. Lesson 2: project planning in digitally-transitioning environments must buffer for "analogue latency." Implementation was hampered by the government's reliance on hard-copy workflows, leading to the physical loss of the ratification dossier during a handover. The lack of "internet culture" and connectivity forces a slower pace than digital-first designs assume
13. Lesson 3: south-south cooperation offers superior cost-effectiveness and cultural compatibility for capacity building. The pivot from distant partners to the Indonesian Research Agency (BRIN) overcame delivery bottlenecks. Regional partners shared similar ecological contexts, making knowledge transfer more efficient than North-South models
14. Lesson 4: anchoring technical knowledge in academic institutions creates resilience against government administrative turnover. While government focal points changed frequently due to political instability, the integration of ABS curricula into national universities created a permanent, resilient reservoir of national capacity
15. Lesson 5: "defensive protection" of Traditional Knowledge through offline documentation allows for ethical project delivery amidst legal vacuums. To mitigate biopiracy risks, the project archived sensitive knowledge in offline booklets. This upheld "Do No Harm" principles while meeting donor requirements for data management
16. Lesson 6: gender-responsive ABS implementation requires distinct documentation of women's specific custodial roles. The project succeeded by explicitly documenting women's unique intellectual property regarding medicinal plants in Community Protocols, ensuring benefit-sharing mechanisms reflect their specific contributions rather than just counting participation numbers.

Recommendations

17. Recommendation #1 (critical): urgent resubmission and digital tracking of the Nagoya protocol ratification. The National Directorate of Biodiversity (NDB) must immediately resubmit the "Ratification Package," which was lost during administrative handovers. Without this, the entire ABS regime lacks legal force.
18. Recommendation #2 (critical): integration of digital infrastructure costs into recurrent state budget. The Ministry of Tourism and Environment must secure a specific budget line for web hosting and domain renewal to prevent the National Biodiversity Database from becoming a "digital cemetery." This is an immediate priority for the next budget cycle.
19. Recommendation #3 (important): simplified direct procurement for laboratory operationalisation. The Executing Agency should launch a simplified procurement process for the remaining essential laboratory equipment (cabling/instruments) to enable the transition from renovation to operation. This is necessary to utilize remaining funds effectively and bridge the "hard" capacity gap.
20. Recommendation #4 (project level): development of a tiered-access digital portal for Traditional Knowledge. Future project phases must design a secure, tiered-access digital portal that allows communities to selectively share archived Traditional Knowledge with

verified commercial partners. This will replace the interim "offline booklet" solution and enable equitable benefit-sharing.

21. Recommendation #5 (opportunity for improvement): legal formalisation of the ABS Technical Committee. The National Directorate of Biodiversity should issue a formal decree to transform the current ad-hoc ABS Technical Committee into a permanent statutory body. This is essential to ensure the committee retains its mandate and budget regardless of individual staff turnover.
22. Recommendation #6 (important): need for Gender Action Plans and baseline metrics. Future project formulation teams and executing agencies must establish explicitly budgeted gender-specific actions and baseline data from the design phase. This is necessary to systematically enforce and monitor the equitable participation of women and marginalised groups in benefit-sharing and consent processes.

Validation

The report has been subject to an independent validation exercise performed by UNEP's Evaluation Office. The performance ratings for the Timor Leste ABS project, set out in the Conclusions and Recommendations section, have been adjusted as a result. The overall project performance is validated at the '**Moderately Unsatisfactory**' level. Moreover, the Evaluation Office has found the overall quality of the report to be 'Satisfactory' (see Annex XIII).

I. INTRODUCTION

A. Context

Intervention context

1. The project was designed to address long-standing structural gaps in Timor-Leste's capacity to regulate access to genetic resources and ensure fair and equitable sharing of benefits arising from their utilisation, as required under the Convention on Biological Diversity (CBD) and the Nagoya Protocol. Although Timor-Leste is situated in the biodiversity-rich Wallacea region with significant terrestrial and marine genetic resources, it lacked at project inception a coherent legal, institutional, and operational framework for Access and Benefit-Sharing (ABS). Consequently, the country faced constraints in managing access to genetic resources, safeguarding customary rights, and capturing potential development benefits linked to research, innovation, and bioprospecting.
2. The root causes of this situation included the absence of dedicated ABS legislation and procedures, fragmented and incomplete biodiversity and traditional knowledge data systems, limited national research and monitoring capacity, and weak coordination among institutions with overlapping mandates. A critical barrier identified at design was that much biodiversity-related information and associated traditional knowledge relevant to Timor-Leste was held by foreign institutions (notably in Portugal, Indonesia, and the Netherlands) due to historical and colonial legacies, rather than being available in a centralised national repository. As a result, the baseline scenario was characterised by a lack of protection for indigenous knowledge and missed opportunities for biodiversity-based economic development.
3. The project was implemented at national level in Timor-Leste, with specific pilot activities targeting the communities of Larisula (Baucau Municipality, representing terrestrial ecosystems) and Macadade (Atauro Special Region, representing marine ecosystems) – see map below. The broader intervention context was characterised by institutional fragility, limited human resources, and evolving political priorities. Implementation was significantly impacted by high staff turnover within government structures and the Project Management Unit (PMU), as noted in interviews. Furthermore, the project faced major external challenges, including the COVID-19 pandemic which restricted movement and international expertise, delays in parliamentary decision-making related to accession to the Nagoya Protocol, and administrative constraints. These contextual factors heavily influenced the pace, sequencing, and extension of project activities.

Figure 1: Project sites



Institutional context

4. The project was implemented under UNEP's Ecosystems Division, Biodiversity and Land Branch. While originally aligned with Sub-programme 4 "Environmental Governance" of the 2018-2021 Strategy at design, it contributed to the Nature Action Subprogramme of UNEP's subsequent Programme of Work during implementation. It aligned with UNEP's expected accomplishments related to strengthening biodiversity governance and advancing fair and equitable access and benefit-sharing frameworks.
5. The project was approved in 2018, with the Project Document signed in August 2018 and implementation officially starting in August 2019. It was designed as a GEF Medium-Sized Project (MSP) with an original duration of 48 months (2019–2022). However, due to the aforementioned implementation delays – particularly those caused by the global pandemic and recruitment difficulties – two no-cost extensions were approved, extending the operational completion date to June 2024 and then to December 2024.
6. UNEP served as the GEF Implementing Agency. The national Executing Agency, originally designated as the Ministry of Development and Institutional Reform (MDIR), transitioned responsibilities to the National Directorate for Biodiversity under the Ministry of Tourism and Environment (and later the Secretary of State for Environment) following government restructuring. The project had a total planned budget of USD 5.37 million, comprising USD 1.32 million in GEF financing and USD 4.05 million in anticipated co-financing from partners including the government, NGOs, and academic institutions. A Mid-Term Review was conducted in March 2023 to assess progress and recommend corrective actions. This Terminal Review represents the final assessment of project performance, results, and sustainability.

B. Results framework

7. The project's intervention logic was structured around two mutually reinforcing components designed to remove barriers to the implementation of the Nagoya Protocol. Component 1 focused on the "soft" enabling environment, aiming to establish the necessary legal, policy, and institutional frameworks, while simultaneously building the capacity and awareness of national stakeholders. Component 2 focused on the "hard" technical and operational aspects, aiming to operationalize these frameworks through the establishment of data management systems (National Database and Clearing House Mechanism) and the implementation of pilot bio-prospecting activities (in two areas).
8. The results hierarchy followed a vertical logic where the establishment of legal certainty and community rights (Outcome 1.1) and increased stakeholder awareness (Outcome 1.2) would create the necessary pre-conditions for technical monitoring (Outcome 2.1) and commercial research (Outcome 2.2). The project management structure, housed within the National Directorate of Biodiversity, was designed to coordinate these legislative and technical streams, ensuring that the pilot activities in Component 2 (e.g., establishing Prior Informed Consent in pilot communities) directly fed lessons back into the regulatory design in Component 1. Results statements were not reformulated.

Table 3: Summary of project's latest approved results framework ¹⁰

	Results Statement
Project objective	To establish the conditions enabling sustainable access to the genetic resources of Timor-Leste, which will deliver fair and equitable benefits to its people, while protecting legal and customary ownership and traditional knowledge.
Impact	Conservation and sustainable use of globally significant biodiversity in Timor-Leste; and fair and equitable sharing of benefits arising from the utilization of genetic resources.
Intermediate state	Operational national ABS framework effectively governing access to genetic resources, with active monitoring and compliance mechanisms in place.
Project outcome	Outcome 1.1: National legal and institutional framework on ABS and the protection of traditional knowledge developed and facilitated towards adoption in accordance with the Biodiversity Decree Law. Outcome 1.2: Increased awareness and capacity of national stakeholders on ABS principles, economic potential and procedures under the Nagoya Protocol and the national framework. Outcome 2.1: Institutional capacity enhanced for enacting Article 17 on 'monitoring' and Articles 8a & 23 on 'promoting research' for sustainable use through consolidation of inventory, cataloguing and fair access to national and internationally held records on biodiversity, genetic resources and traditional knowledge. Outcome 2.2: Enhanced technological and business capacity for bio-prospecting in Timor-Leste, in compliance with the Nagoya Protocol on sustainable utilisation of genetic resources.
Outputs	1.1.1: National regulatory, policy and institutional framework developed and facilitated towards adoption. 1.1.2: Nationally agreed model Community Protocols developed based on local indigenous practices. 1.1.3: National-specific ABS model agreements (PIC, MAT) developed. 1.1.4: High-level dialogue established with policy makers and Parliament. 1.1.5: Information for formal accession to the Nagoya Protocol consolidated. 1.2.1: Outreach and institutional development plan prepared. 1.2.2: National outreach campaign implemented. 1.2.3: Targeted training carried out for staff of Competent National Authority and key agencies. 2.1.1: Consolidated National Database on biodiversity and national ABS Clearing House Mechanism established. 2.1.2: Protocols established for collecting, cataloguing, and monitoring access to scientific records. 2.2.1: Memorandum of Agreement signed for collaborative research (with Nimura Genetic Solutions). 2.2.2: Bio-prospecting trials implemented and enabled through PIC and MAT agreements. 2.2.3: Existing and new opportunities for bio-prospecting identified (report produced).

C. Project Implementation Structure and Partners

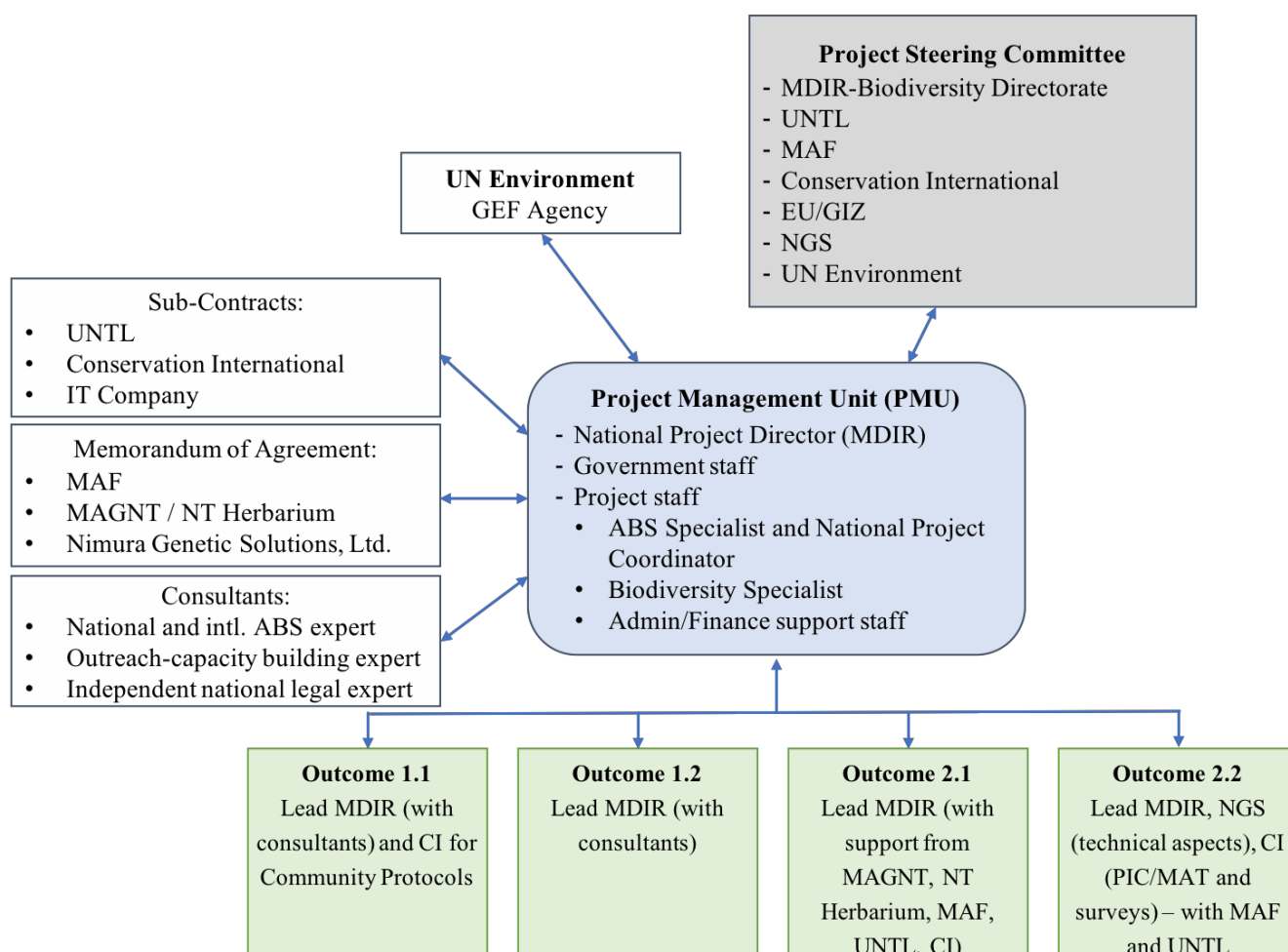
- Implementation and execution: the project was implemented by the United Nations Environment Programme (UNEP) through its Ecosystems Division (Biodiversity and Land

¹⁰ Source: ProDoc & CEO Endorsement

Branch), which provided overall oversight, ensured compliance with GEF policies, and monitored project progress. The National Directorate for Biodiversity (NDB) served as the Executing Agency (EA). While the Project Document originally designated the Ministry of Development and Institutional Reform (MDIR) as the host institution, government restructuring during implementation shifted this responsibility to the Ministry of Tourism and Environment (later the Secretary of State for the Environment - SSE). A Project Management Unit (PMU) was established within the NDB, led by a GEF-funded National Project Coordinator and supported by technical specialists (Biodiversity, Legal, and IT), reporting to a National Project Director appointed by the government.

10. Oversight and governance: a Project Steering Committee (PSC) was constituted to provide policy guidance and approve annual work plans. Originally, the PSC included representatives from the EA, UNEP, Ministry of Agriculture and Fisheries (MAF), National University of Timor-Leste (UNTL), Conservation International (CI), and Nimura Genetic Solutions (NGS). However, following recommendations from the Mid-Term Review (MTR) regarding potential conflicts of interest, CI and NGS were transitioned from voting members to observer status in 2023 to ensure independent decision-making regarding resource allocation. Additionally, an ABS Task Force and a technical ABS Technical Committee were established to provide specialised advice on regulatory drafting and scientific validation.

Figure 2: Organogram of the project with key project stakeholders



11. Key Project Partners and Roles

Partner	Role in Project Delivery
Ministry of Agriculture, Livestock, Fisheries and Forestry (MALFF)	Key government partner for terrestrial and marine genetic resources. MAF's Soil Laboratory supported bioprospecting trials and its staff participated in technical capacity building.
Conservation International (CI) Timor-Leste	Lead partner for Outcome 1.1 and 2.2 at community level. Responsible for analysing customary laws, developing model Community Protocols, and facilitating Prior Informed Consent (PIC) processes in pilot sites (Larisula and Macadade).
Nimura Genetic Solutions (NGS)	Private sector partner for Outcome 2.2. Provided technical assistance for laboratory establishment, training on bioactive compound screening, and market analysis for bioprospecting.
Academic Institutions (UNTL, UNDIL, UNPAZ, ICS)	Originally led by UNTL's Centre for Climate Change and Biodiversity (CCCB) for the database; roles expanded to a 'consortium' of universities during implementation to support specimen collection, taxonomy training, and hosting the National Biodiversity Database.
BRIN (National Research and Innovation Agency, Indonesia)	It replaced MAGNT (Australia) during implementation. Provided critical technical assistance for developing data management protocols and capacity building for the National Herbarium and database.

D. Stakeholders

12. Government institutions: the National Directorate for Biodiversity (NDB) (under the Ministry of Tourism and Environment/SSE) acted as the primary Executing Agency and key change agent, driving the legislative agenda for the Nagoya Protocol. Key technical support was provided by the Ministry of Agriculture, Livestock, Fisheries and Forestry (MALFF) (Soil and Seed Labs) and the Ministry of Health (National Health Laboratory), particularly for specimen analysis and pathogen screening. High-level engagement targeted the National Parliament and Council of Ministers to advocate for ratification, although engagement with parliamentarians faced challenges due to electoral cycles and competing priorities.
13. Academic and research partners: the project experienced significant changes in this stakeholder group. The Centre for Climate Change and Biodiversity (CCCB) at UNTL, originally designated as the lead research partner and database host, withdrew from participation early in implementation due to institutional divergences. To fill this gap, the project successfully mobilised a new consortium of universities, including the University of Dili (UNDIL), University of Peace (UNPAZ), and the Dili Institute of Health Science (ICS), to conduct bioprospecting trials and receive capacity building. Furthermore, the Indonesian National Research and Innovation Agency (BRIN) replaced the originally planned Museum and Art Gallery of the Northern Territory (MAGNT) and NT Herbarium for technical assistance on the database and taxonomy, as the Australian partners could not align with the project's revised timeline following delays.
14. Civil society and private sector: Conservation International (CI) served as the lead execution partner for Outcome 1.1 at local level, facilitating the development of Community Protocols and PIC/MAT negotiations. Nimura Genetic Solutions (NGS) was the primary private sector change agent, providing essential technology transfer for bioprospecting and laboratory design. Following Mid-Term Review recommendations regarding potential conflicts of interest, both CI and NGS were transitioned from voting Steering Committee members to observer status in 2023. The European Union/GIZ,

originally a major co-financier, had limited participation as their associated project (Ai Ba Futuru) concluded before the delayed ABS activities could fully operationalise.

15. Key change agents, including government ministries (e.g., MDIR, MAF), academic consortia, civil society partners (such as Conservation International), and local *Suco* (village) leaders, were identified as the primary drivers for institutional and community-level buy-in. To ensure due attention was given to gender and under-represented groups, the project recognised women as the primary custodians of Traditional Knowledge (TK) related to biological resources. Consequently, executing partners planned and conducted separate consultations with women to capture their perspectives and integrate their distinct rights into the drafted Community Protocols and Mutually Agreed Terms (MAT). Furthermore, the project engaged marginalized and geographically isolated Indigenous and Local Communities (ILCs) in pilot sites like Larisula and Macadade by translating technical ABS concepts into local languages (e.g., Tetum) and rigorously applying Free, Prior and Informed Consent (FPIC) procedures to build trust. Finally, regarding persons living with disabilities, the project documents did not explicitly record targeted accessibility considerations or specific outreach strategies, representing a gap in the engagement of this specific vulnerable group during implementation.

E. Changes in Design during Implementation

16. The project's scope, timeline, and execution were significantly affected by several external challenges, which necessitated formal changes to the project's design and implementation arrangement:

17. External Challenges:

- COVID-19 pandemic: the project experienced severe operational delays immediately following its inception due to the global pandemic (2020–2022). Health measures, lockdowns, and travel bans restricted international expertise and field mobilisation. This was compounded by a critical management vacuum, specifically a 1.5-year gap in the Project Coordinator position and the dismissal of the initial Biodiversity Specialist, leading to an "Unsatisfactory" implementation rating in early PIRs.
- Political upheaval and institutional restructuring: national elections and frequent government restructuring, such as the transition of the executing agency from the Ministry of Development and Institutional Reform (MDIR) to the Ministry of Tourism and Environment / Secretary of State for Environment, severely impacted the project. These political shifts caused a loss of institutional memory, months-long "blackouts" in procurement and administrative procedures, and the frequent turnover of key focal points and directors.
- Infrastructure deficits: the project operated in a context with fragile physical and digital infrastructure. A lack of reliable internet, unstable electricity in government offices, and chronic delays in laboratory reconstruction further constrained the timely execution of project activities.

18. Changes in Implementation:

- Partnership and governance restructuring (2023): following recommendations from the MTR, the project governance structure was revised to address conflicts of interest; Conservation International and Nimura Genetic Solutions were transitioned from voting members of the Steering Committee to Observer status. Operationally, the withdrawal of the original lead academic partner, CCCB-UNTL, and the unavailability of the Museum and Art Gallery of the Northern Territory (MAGNT) necessitated a strategic review. The project formally replaced these partners with a new consortium of local universities and established a technical cooperation agreement with the

Indonesian National Research and Innovation Agency (BRIN) and GBIF to deliver Outcome 2.1.

- Formal extensions and budget revisions: to compensate for these external delays and the 2023 government restructuring, two No-Cost Extensions (NCE) were approved, extending the project's total duration by 24 months. Amendment No. 1 (May 2023) extended the technical completion date from December 2022 to 30 June 2024 (18 months). Amendment No. 2 (April 2024) extended the technical completion date to 31 December 2024 (6 months), with administrative closure scheduled for June 2025. Concurrently, formal budget revisions were executed to reallocate funds (>10% across budget lines) towards laboratory equipment and training, mitigating the non-materialisation of committed co-financing from the EU/GIZ and UNTL.

F. Project Financing

19. Initial budget and financing structure: the project was approved with a total budget of USD 5,369,863. This financial package was structured around a Global Environment Facility (GEF) Trust Fund grant of USD 1,319,863 (representing approximately 25% of the total cost) and a substantial co-financing commitment of USD 4,050,000 (75%). The co-financing strategy was designed as a hybrid model, combining Cash contributions totalling USD 800,000 (roughly 15% of the total budget) with in-kind contributions estimated at USD 3,250,000. The cash commitments were exclusively pledged by government partners - specifically the Ministry of Development and Institutional Reform (MDIR) for USD 500,000 and the Ministry of Agriculture and Fisheries (MAF) for USD 300,000 - signalling a strong initial political will to invest direct public funds into the ABS framework.
20. Evolution of partnerships and impact on co-financing: during implementation, the consortium of co-financing partners underwent significant structural changes that directly affected resource mobilisation. The Centre for Climate Change and Biodiversity (CCCB) at UNTL, originally committed to providing USD 100,000 in in-kind support, withdrew from the project, nullifying their contribution. Furthermore, the largest anticipated co-financing partner, the European Union (pledging USD 1,100,000 via the Ai Ba Futuru project), did not materialise as planned: it was actually terminated by the time the ABS project accelerated implementation; the EU project cycle concluded in 2022, before the delayed ABS activities could fully align and synergise with their interventions. Conservation International (CI) significantly stepped up its engagement, exceeding its planned role to become a critical pillar for the execution of community-level activities, effectively bridging gaps left by the disengagement of other actors.
21. Financial performance and co-financing realisation: as of the final reporting period (June 2025), the total secured co-financing stands at USD 956,539, representing only 24% of the initial target. A critical divergence from the design lies in the nature of these contributions: while USD 800,000 was anticipated in cash, the realised co-financing is exclusively in-kind (100%). No cash transfers were made by the partner ministries to the project accounts. This shortfall is attributed to persistent administrative hurdles, government restructuring (the transition of MDIR to MTCL and later SSE), and shifting national budgetary priorities. Government cash counterpart funding was limited to laboratory infrastructure rehabilitation (+/- 20,000 USD).
22. GEF grant expenditure and budget management: cumulative expenditure of the GEF grant as of 30 June 2025 reached USD 1,157,234, corresponding to a disbursement rate of 90%. Financial management was characterised by an extremely slow start, with minimal expenditure during the first two years (2019–2020) due to the COVID-19 pandemic and a vacancy in the Project Coordinator position for over 18 months. To compensate for these delays, significant budget revisions were executed from 2023 onwards, enabled by two

No-Cost Extensions (NCE). These revisions involved reallocating over 10% of funds across budget lines, shifting resources originally designated for international consultants towards the procurement of tangible assets, specifically laboratory equipment under Component 2, and capacity building to ensure delivery before closure.

23. Allocation by component: the budget was organised around two technical components and a management component. Component 2 (operationalisation of the Nagoya Protocol and Bioprospecting) ultimately absorbed an increasing share of effective resources, particularly for the procurement of laboratory hardware required to establish national testing capacity. Project Management Costs (PMC) required rigorous control; fixed personnel costs extended over a duration 24 months longer than planned (total 72 months vs. 48 months). To remain within the GEF cap of 5% for management costs, the Executing Agency had to manage trade-offs, often ensuring that technical staff costs were strictly attributed to operational components rather than general administration.

Table 4: Co-financing table

Co-financing (Type/Source)	UNEP own Financing (US\$1,000)		Government (US\$1,000)		Other* (US\$1,000)		Total (US\$1,000)		Total Disbursed (US\$1,000)
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	
– Grants			800.0 ¹¹	0			800.0	0	0
– Loans									
– Credits									
– Equity investments									
– In-kind support	100.0	100 ¹²	1,246.0 ¹³	628.779 ¹⁴	1,904.0 ¹⁵	227.760	3,250.0	956.539	956.539
– Other (*) -									
Totals	100	100.0	2,046.0	628.779	1,904.0	227.760	4,050.0	956.539	956.539

Actual GEF Expenditures

UNEP Budget lines	Description	Actual Expenditure 2020	Actual Expenditure 2021	Actual Expenditure 2022	Actual Expenditure 2023	Actual Expenditure 2024	Total
1199	Staff and other personnel costs	15,000.00	21,000.00	7,800.00	53,816.00	126,593.00	224,209.00
1299	Staff and other personnel costs	-	30,500.00	-	36,039.00	86,335.00	152,874.00
1399	Staff and other personnel costs	12,000.00	12,000.00	12,600.00	10,750.00	17,300.00	64,650.00
1699	Travel	75.00	12,000.00	26,923.00	34,104.00	102,263.00	175,365.00
2199	Transfers and Grants to Counterparts	-	-	-	42,742.00	90,955.00	133,697.00
2299	Transfers and Grants to Counterparts	-	-	-	-	19,652.00	19,652.00
2399	Transfers and Grants to Counterparts	-	-	-	22,500.00	45,000.00	67,500.00
3299	Travel	-	7,500.00	6,500.00	18,417.00	72,798.00	105,215.00
3399	Travel	2,166.00	19,900.00	10,422.00	36,216.00	25,557.00	94,261.00
4199	Supplies, Commodities, Materials	2,568.00	3,900.00	2,312.00	1,423.00	4,270.00	14,473.00
4299	Equipment, Vehicles and Furniture	6,976.00	-	1,663.00	150.00	128,786.00	137,575.00
4399	General operating and other direct costs	-	-	-	-	-	-
5199	General operating and other direct costs	681.00	1,505.00	5,040.00	17,246.00	5,920.00	30,392.00
5299	General operating and other direct costs	-	-	615.00	-	19,385.00	20,000.00
5399	General operating and other direct costs	-	-	-	-	-	-
5599	General operating and other direct costs	-	-	-	-	30,000.00	30,000.00
Total		39,466.00	108,305.00	73,875.00	273,403.00	774,814.00	1,269,863.00

¹¹ MDIR : 500k US\$ and MAF : 300k US\$

¹² Estimate based on the ongoing technical support reported in the 2025 PIR

¹³ MDIR: 546.0k US\$ and MAF: 700.0k US\$

¹⁴ MDIR 227.7k US\$ and MAF 133.2k US\$

¹⁵ EU: 1,100.0k US\$; CI: 454.0k US\$; NGS: 250.0k US\$ and UNTL: 100.0k US\$

II. REVIEW METHODS

A. UNEP's review approach

24. In line with UNEP Evaluation Policy and the UNEP Programme and Project Management Manual, the review was undertaken at operational completion of the project to assess performance (in terms of relevance, effectiveness and efficiency) and determine outcomes and impacts (actual and potential) stemming from the project, including their sustainability. The review has two primary purposes: (i) to provide evidence of results to meet accountability requirements, and (ii) to promote operational improvement, learning and knowledge sharing through results and lessons learned.
25. The main target audiences for the review findings are UNEP, Government institutions, academic and research partners, civil society and the private sector, indigenous and local communities, as well as marginalised or potentially disadvantaged groups i.e. gender and people with disabilities.
26. In line with the UNEP Evaluation Policy and the UNEP Programme Manual, the review has been carried out using a set of 9 commonly applied review criteria which include: (1) Strategic Relevance, (2) Quality of Project Design, (3) Nature of External Context, (4) Effectiveness (incl. availability of outputs; achievement of outcomes and likelihood of impact), (5) Financial Management, (6) Efficiency, (7) Monitoring and Reporting, (8) Sustainability and (9) Factors Affecting Project Performance and Cross-Cutting Issues (see Annex II: Review Framework for more details on each review criterion).
27. Most review criteria are rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability and Likelihood of Impact are rated from Highly Likely (HL) down to Highly Unlikely (HU) and Nature of External Context is rated from Highly Favourable (HF) to Highly Unfavourable (HU). The ratings against each criterion are 'weighted' to derive the Overall Project Performance Rating. The greatest weight is placed on the achievement of outcomes, followed by dimensions of sustainability.
28. The UNEP Evaluation Office has developed detailed descriptions of the main elements required to be demonstrated at each level (i.e. Highly Satisfactory to Highly Unsatisfactory) for each review criterion. The reviewer has considered all the evidence gathered during the review in relation to this matrix to generate review criteria performance ratings.
29. In addition to the 9 review criteria outlined above, the review addresses a number of strategic questions that were formulated in the Terms of Reference. These questions were posed by the members of the Project Team.
30. For projects funded by the GEF, findings from the review are to be uploaded in the GEF Portal. To support this process, review findings related to the 5 topics of interest to the GEF are summarised in Annex XI. The intended action/results on the 5 topics were described in the GEF CEO Endorsement and Approval documents. The 5 topics are: i) performance against GEF's Core Indicator Targets; ii) engagement of stakeholders; iii) gender-responsive measures and gender result areas; iv) implementation of management measures taken against the Safeguards Plan and v) challenges and outcomes regarding the project's completed Knowledge Management Approach.

31. This review adopted a participatory approach, consulting with project team members, partners and beneficiaries at several stages throughout the process. Central to the review was the analysis (and reconstruction) of the project's Theory of Change. Consultations were held during the review inception phase to arrive at a nuanced understanding of how the project intended to drive change and what contributing conditions ('assumptions' and 'drivers') would need to be in place to support such change. The (reconstructed) Theory of Change, supported by a graphic representation and narrative discussion of the causal pathways, was discussed further with respondents during the data collection phase, and refined as appropriate. The final iteration of the Theory of Change is presented in this final review report and has been used throughout the review process.

B. Data Collection

Primary data sources

32. The review employed a mixed-methods approach, prioritising qualitative inquiry to capture the depth of institutional change and stakeholder perspectives. Primary data was collected during an in-country mission to Timor-Leste conducted from 7–13 December 2025, supplemented by remote interviews for international partners.

33. Respondents were identified using purposive sampling to ensure representation across four critical stakeholder categories: (i) Government Agencies (policy and technical staff from MDIR/SSE, MAF, and MoH); (ii) Implementing and Executing Partners (UNEP, UNTL, Conservation International); (iii) Technical Service Providers (BRIN, NGS); and (iv) Beneficiaries (Indigenous and Local Communities in pilot sites, students, and researchers).

34. The primary data collection tools included:

- Semi-structured interviews: Conducted with key decision-makers and project staff (e.g., Project Technical Lead, Legal Officers) to reconstruct the implementation history and decision-making processes.
- Focus Group Discussions (FGDs): utilised for Atau community consultations in Dili and with university faculties (UNDIL, UNTL) to assess capacity building and awareness impacts.

Due to the limited time (5 days), site visits/observation were not possible; however, some beneficiaries were interviewed while in Dili.

35. Data verification was employing triangulation to cross-reference interview claims against technical reports (e.g., verifying "completed" databases against actual online functionality) and comparing financial delivery rates with reported activity progress.

Table 5: Review respondents and field visits

Stakeholders - Individuals			A. Total number involved (M/F)	B. Planned number to contact (M/F)	Sample size (% B/A) ¹⁶
Project Team	Project Team	Implementing agency (UNEP Task Manager, Financial Management Officer, Regional ABS Focal Points)	TBD	All relevant UNEP staff	100%

¹⁶ Percentage of people involved in the project that the review plans to contact.

		Executing agency(ies) (MDIR departments involved in ABS governance – legal, biodiversity, laboratories)	Confirmed with MDIR	Targeted focal points (M/F)	60–80%
Beneficiaries	Direct Beneficiaries: (training participants, ABS committee members, TK holders, researchers)		Based on training/event attendance sheets	Purposive sample ensuring gender and community representation	<10% (logistical challenges to plan for field trips to project sites)
	Indirect Beneficiaries: (community members, civil society, local authorities, households exposed to outreach activities)		Unknown universe	Small sample – community leaders, women’s groups, youth groups	Not applicable
Stakeholders - Entities			A. Total number involved	B. Planned number to Contact	Sample size (% B/A) ¹⁷
Partners	Project implementing/ executing partners (MDIR, UNTL/CI)		3	3	100%
	Project collaborating/ contributing partners ¹⁸ (MAGNT, GBIF, BRIN, local universities, NGOs)		Based on partner list	Key technical partners engaged in ToC pathways	50–70%
Possible Field Visits	Region / country / locality ¹⁹		A. Total number sites	B. Planned number sites to visit	Sample Size (%B/A) ²⁰
	Asia and the Pacific Timor-Leste (Dili, selected municipalities with community protocol/TK work)		Dependent on PMU mapping	Not carried out	Not applicable

Strategies for inclusivity:

36. To maximise response rates and ensure the inclusion of marginalised voices, the review adopted a human rights and gender-responsive approach. Specific strategies included conducting separate consultations for women and youth in the pilot communities of Larisula (indirect information through interviews) and Macadade (interview in Dili) to create safe spaces for voicing concerns regarding Traditional Knowledge (TK) sharing, as outlined in the Inception Report. The reviewer, being bilingual (English/Portuguese), facilitated direct engagement with government and academic stakeholders, while interpretation support was utilised for Tetum-speaking community members to ensure language was not a barrier to participation.

C. Data Analysis

37. The review employed a mixed-methods analytical approach to synthesize primary and secondary data, ensuring that findings were robust, evidence-based, and triangulated. The specific analytical methods applied included:

- Triangulation: this was the primary method for data validation. Key findings were cross-verified by comparing evidence from three distinct sources: (i) project documentation (ProDoc, PIRs, financial reports); (ii) stakeholder perceptions gathered through interviews and focus groups; and (iii) direct observation during field visits to Dili and to beneficiaries. Discrepancies between official reports and stakeholder accounts - for

¹⁷ Percentage of entities involved in the project that the review plans to contact.

¹⁸ Contributing partners may be providing resources as either cash or in-kind inputs (e.g. staff time, office space etc.).

¹⁹ In case of a global project, the unit of analysis is 'region'. In case of a regional or multi-country project, the unit of analysis is 'country'. In case of a single country project, the unit of analysis is 'locality', which could refer to a city, town, village, etc.

²⁰ Percentage of total number project sites in each region, country or locality that the review plans to visit.

instance, regarding the functionality of the biodiversity database - were specifically investigated to establish the factual ground reality.

- Theory of Change (ToC) analysis: the review tested the causal logic of the project by assessing the status of the "drivers" and "assumptions" identified in the Reconstructed Theory of Change (developed during the inception phase). This involved tracing the progression from delivered outputs (e.g., draft regulations) to intermediate states (e.g., institutional uptake) to determine if the expected causal pathways held true or were disrupted by external factors such as political instability or COVID-19.
- Thematic and content analysis: qualitative data from semi-structured interviews and Focus Group Discussions (FGDs) were coded and analysed to identify recurring themes and patterns. This analysis focused on identifying systemic bottlenecks, institutional capacity gaps, and determining factors for sustainability.
- Gender and human rights analysis: a specific lens was applied to analyse participation data and community consultation records. This assessed not just the number of women involved, but the quality of their engagement in decision-making processes regarding Traditional Knowledge (TK) and benefit-sharing, verifying compliance with the project's gender marker and human rights obligations.
- Scoring and rating: finally, quantitative and qualitative evidence was synthesised to assign performance ratings against UNEP's standard evaluation criteria (Strategic Relevance, Effectiveness, Efficiency, Sustainability, etc.) using the mandatory six-point scale (Highly Satisfactory to Highly Unsatisfactory), based on the descriptors provided in the UNEP Evaluation Office's Criteria Ratings Matrix.

D. Limitations and Mitigation Strategies

38. Time constraints and lack of field visits: the most significant limitation of the review was the lack of time, which did not allow for field visits to the pilot community sites in Larisula (Baucau) and Macadade (Atauro). Consequently, the reviewer could not directly observe the on-site implementation of Bio-Community Protocols, verify the physical deployment of equipment in remote areas, or conduct face-to-face focus groups with the broader community membership to independently validate their level of understanding regarding Access and Benefit Sharing (ABS) mechanisms.
39. Mitigation of field data gaps: to mitigate the absence of direct field observation, the review employed a rigorous triangulation strategy using secondary sources. This included:
 - Proxy verification: in-depth interviews were conducted with field intermediaries who had a direct presence on the ground, specifically staff from Conservation International (CI) and PMU, to reconstruct community engagement processes.
 - Digital evidence: the review utilised photographic evidence, field reports, and signed attendance lists provided by partners to verify the occurrence and participation levels of community consultations.
 - Cross-referencing: claims regarding community consent were cross-referenced against the signed Prior Informed Consent (PIC) and Mutually Agreed Terms (MAT) documents drafted by the project.
40. Institutional memory and staff turnover: another significant limitation was the high turnover of key personnel within the Executing Agency and PMU over the project's six-year lifespan. Notably, the position of National Project Coordinator was vacant for over 18 months, and several government focal points changed due to ministerial restructuring.

This created gaps in institutional memory regarding early project decisions. To mitigate this, the review triangulated oral accounts with a review of archival documentation (PIRs, Steering Committee minutes) to reconstruct the implementation history.

41. Language barriers: the review operated in a complex multilingual environment involving Tetum, Portuguese, English, and Bahasa Indonesia. While the evaluator is bilingual (English/Portuguese), many community stakeholders and some government staff are primarily fluent in Tetum. To overcome this, the PMU provided interpretation support during some interviews. Key concepts regarding "Access and Benefit Sharing" were carefully contextualised using local customary terms to ensure accurate understanding during interviews.
42. Availability of financial and administrative records: access to complete financial records was constrained by the reliance on hard-copy filing systems within the Executing Agency, some of which were reported as "misplaced" or difficult to retrieve due to office moves and the lack of a digital archive. The review mitigated this by relying on the digital financial reports submitted to UNEP (expenditure statements) and using the Mid-Term Review's financial analysis as a verified baseline for the first half of the project.
43. Digital connectivity and remote engagement: limited internet connectivity within government offices in Dili posed a challenge for scheduling and conducting remote preparatory interviews. This was mitigated by prioritising in-person data collection during the field mission (7–13 December 2025) for all government stakeholders, reserving virtual methods only for international partners.

E. Ethical Considerations

44. Throughout this review process and in the compilation of the Final Review Report, efforts have been made to represent the views of both mainstream and more marginalised groups. Data were collected with respect for ethics and human rights issues. Information gathered after prior informed consent from people, all discussions remained anonymous, and all information was collected according to the UN 'Standards of Conduct'.
45. Protection of Traditional Knowledge (TK): given the sensitive nature of the project, specific ethical safeguards were applied regarding Traditional Knowledge. The review strictly adhered to the principle that no proprietary TK shared during interviews (e.g., specific medicinal uses of plants) would be recorded in the review report to prevent misappropriation or "biopiracy" risks. Discussions focused solely on the process of benefit-sharing and consent, rather than the content of the knowledge itself.
46. Inclusivity and anonymity: to protect respondents in a small professional community like Dili, where individuals are easily identifiable, all quotes and sensitive opinions in this report have been anonymised (e.g., attributed to "Government Stakeholder" rather than specific titles).

III. THEORY OF CHANGE AT REVIEW

Reconstruction Process

47. The Theory of Change (ToC) at review was reconstructed during the Inception Phase (November/December 2025) to explicitly map the causal pathways between the project's outputs, its intended outcomes, and the long-term impact. This process involved a systematic desk review of the original Project Document (ProDoc) (2018), the CEO Endorsement Request, and the project's logical framework. These design documents were cross-referenced with adaptive management decisions recorded in Project Implementation Reports (PIRs) from 2021 to 2025 and the Mid-Term Review (MTR) to ensure the reconstructed logic reflected the project's operational reality.
48. The reconstruction did not seek to rewrite the project's history but to clarify the "missing middle" between the delivery of technical outputs (e.g., drafts of laws, databases) and the achievement of the long-term impact (biodiversity conservation). The draft ToC was validated through consultations with the UNEP Task Manager and the Project Management Unit to confirm that the causal logic remained relevant despite the significant delays and institutional changes that characterised the implementation period.

Justification for Reformulation of Results Statements

49. The project's original results hierarchy was found to be logically consistent and was maintained throughout implementation. Consequently, the Reconstructed ToC (RTOC) retains the original wording for the Project Objective, Outcomes, and Outputs, as detailed in **Table 7**.
50. Still, the original design did not explicitly articulate Intermediate States - the transitional conditions required between the achievement of project outcomes and the realisation of the long-term impact. The Reconstructed Theory of Change (RTOC) introduces these states to allow for a more rigorous assessment of the likelihood of impact. Specifically, the RTOC is anchored in the concept of "Routine Application," which distinguishes between having capacity (the project endpoint) and using it (the driver for impact). The original logic implicitly assumed that creating tools (databases, laws) would automatically lead to conservation outcomes. This is not necessarily true. To bridge this gap, the identified Intermediate States define the necessary shift from a temporary "project mode" to a sustained "institutional mode."
51. Specific transitions in daily operations characterise this shift, moving from project-supported inputs to autonomous institutional functions. The specific Intermediate States formulated to capture this transition are defined in **Table 7** below.

Table 6: Justification for reformulation of results statements

Formulation in original project document(s) – <i>insert source/date</i>	Formulation for reconstructed ToC at review inception (RTOC)	Justification for reformulation and/or consultant's explanatory notes on the interpretation ²¹ of the result
(LONG LASTING) IMPACT		
Enhanced conservation and sustainable use of biodiversity through the effective implementation of	Enhanced conservation and sustainable use of biodiversity supported through the establishment and initial operationalisation of a	Minor change - clarification to align with UNEP's definition of impact as a long-term, indirect contribution; no change in intended scope

²¹ In some instances, the results statement may not need to be reformulated, but implied meanings need to be made explicit or understanding clarified. In other cases, it may be necessary to specify the stakeholder, etc.

the Nagoya Protocol in Timor-Leste (ProDoc 2018, p. 54)	national ABS framework aligned with the Nagoya Protocol	
INTERMEDIATE STATES		
Routine application (institutionalization)		
Not existing for outcome 1.1	The national ABS legal and institutional framework is operationalised, with clearly assigned mandates and procedures being applied by competent authorities to regulate access to genetic resources and associated traditional knowledge	Needed to articulate the expected post-output condition whereby the legal and institutional framework moves beyond development and facilitation towards practical application, enabling assessment of the likelihood that Outcome 1.1 contributes to sustained ABS implementation.
Not existing for outcome 1.2	Key national stakeholders consistently apply acquired knowledge and capacities on ABS principles and procedures in policy, institutional, research and community-level practices.	Needed to distinguish between short-term delivery of awareness-raising and training outputs and the sustained application of knowledge and capacities required for longer-term behavioural and institutional change.
Not existing for outcome 2.1	National systems for biodiversity, genetic resources and traditional knowledge information are routinely used to support monitoring, permitting, research collaboration and compliance with the Nagoya Protocol	Needed to capture the transition from the establishment of databases, protocols and partnerships to their regular and functional use (required for assessing the sustainability of monitoring and research functions beyond project completion).
Not existing for outcome 2.2	National actors demonstrate sustained technical and organisational capacity to pursue compliant bioprospecting and innovation initiatives that can generate benefits while reinforcing conservation and sustainable use objectives.	Needed to reflect the expected longer-term effect of capacity-building and pilot activities, linking project-level outputs to the potential for continued, compliant bioprospecting and benefit-generation without implying guaranteed economic or conservation outcomes.
PROJECT OUTCOMES		
1.1, 1.2, 2.1, 2.2	Same as design	
OUTCOME INDICATORS		
	Same as design	
OUTPUTS		
	Same as design	
OUTPUT INDICATORS		
	Same as design	

52. The specific drivers and assumptions underpinning the causal pathways have been reformulated to reflect the operational reality; these are detailed in **Table 8**.

Table 7: Justification for reformulation/expansion of drivers and assumptions

Formulation in original project document(s) – <i>insert source/date</i>	Formulation for reconstructed ToC at review inception (RTOC)	Justification for reformulation and/or consultant's explanatory notes on the interpretation ²² of the driver or assumption
DRIVERS		

²² In some instances, the drivers or assumptions may not need to be reformulated, but implied meanings need to be made explicit or understanding clarified. In other cases, it may be necessary to add driver and assumptions that were not previously identified in the original TOC or results framework.

Sector agencies and partners remain committed to supporting the implementation of ABS in Timor-Leste (Appendix 3 – Assumptions & Risks)	Sustained commitment of national institutions and partners to implement ABS measures.	Reformulated to reflect this as a positive enabling condition rather than an assumption blocking delivery.
High-level support from policy-makers and parliament for acceding to the Nagoya Protocol (Section 3.4)	Continued political will to advance ABS legislation and Nagoya Protocol accession.	Simplified/identified as a driver because political will pushes Output → Outcome progression.
International partners remain committed to provide technical support and capacity building (Section 3.4)	Ongoing engagement of international partners providing technical inputs and collaboration.	Reformulated to show the enabling influence of external partners (as a driver).
State and customary owners understand and reach agreement... (Sections 2.1–2.3 on barriers and context)	Willingness of customary authorities and communities to collaborate in ABS processes (traditional knowledge documentation [TK], prior informed consent [PIC] and mutually agreed terms [MAT], benefits-sharing agreements [BSAs]).	In the TOC, their willingness is a driver; their acceptance appears as an assumption. Better separate to clarify causality.
Project aims to stimulate research and business interests ... building capacity and starting pre-investments (Section 3.4)	Active interest from research and business actors in exploring GR/TK-based opportunities.	Reformulated into a measurable enabling condition so as to facilitate Outcome 2.2.
Economic opportunities, value and sustainable development potential of biological resources (in Context, ProDoc)	National motivation to realise economic benefits from genetic resources and TK.	Reformulated as a driver because original para is about support to achieve impact
ASSUMPTIONS		
Implicit Objective-level assumption: political context stability (Appendix 3).	Political stability is maintained throughout the project period.	Explicit formulation needed for TOC; essential for continuity of legal processes and institutional coordination.
No major institutional restructuring affecting execution (Section 3.4).	Institutional arrangements of lead agencies remain stable.	Reformulated clearly; necessary to avoid disruption of Outputs and Outcomes as often institutional restructuring can occur quite often during the project timeframe
Stakeholders continue to participate (Section 3.4).	Key stakeholders (ministries, researchers, communities) remain engaged in project processes.	Reformulation clarification of stakeholders as specific groups (while actual individuals can rotate) ; to ensure causal pathways
Communities must understand and reach agreement (Sections 2.1–2.3).	Local communities accept PIC/MAT procedures and BSA arrangements.	This is an assumption because acceptance is not a fact; it may be uncertain
Implicit UNEP HRBA/gender requirement (Section 3.4).	Women and men participate equitably in ABS consultations and benefit-sharing processes.	Required assumption where gender commitments exist implicitly but it is not stated as results.
Research/business interest must remain stable (Section 3.4).	Research and business demand for GR/TK-based partnerships remains stable.	Expressed as an assumption because sustained demand is uncertain (e.g. after some time/analysis, there may not be a case for further support/interest).
Continuity of international CBD / Nagoya agendas (in the subchapter).	International ABS frameworks remain stable and supportive.	Assumption because shifts in international community support could undermine legal accession processes.

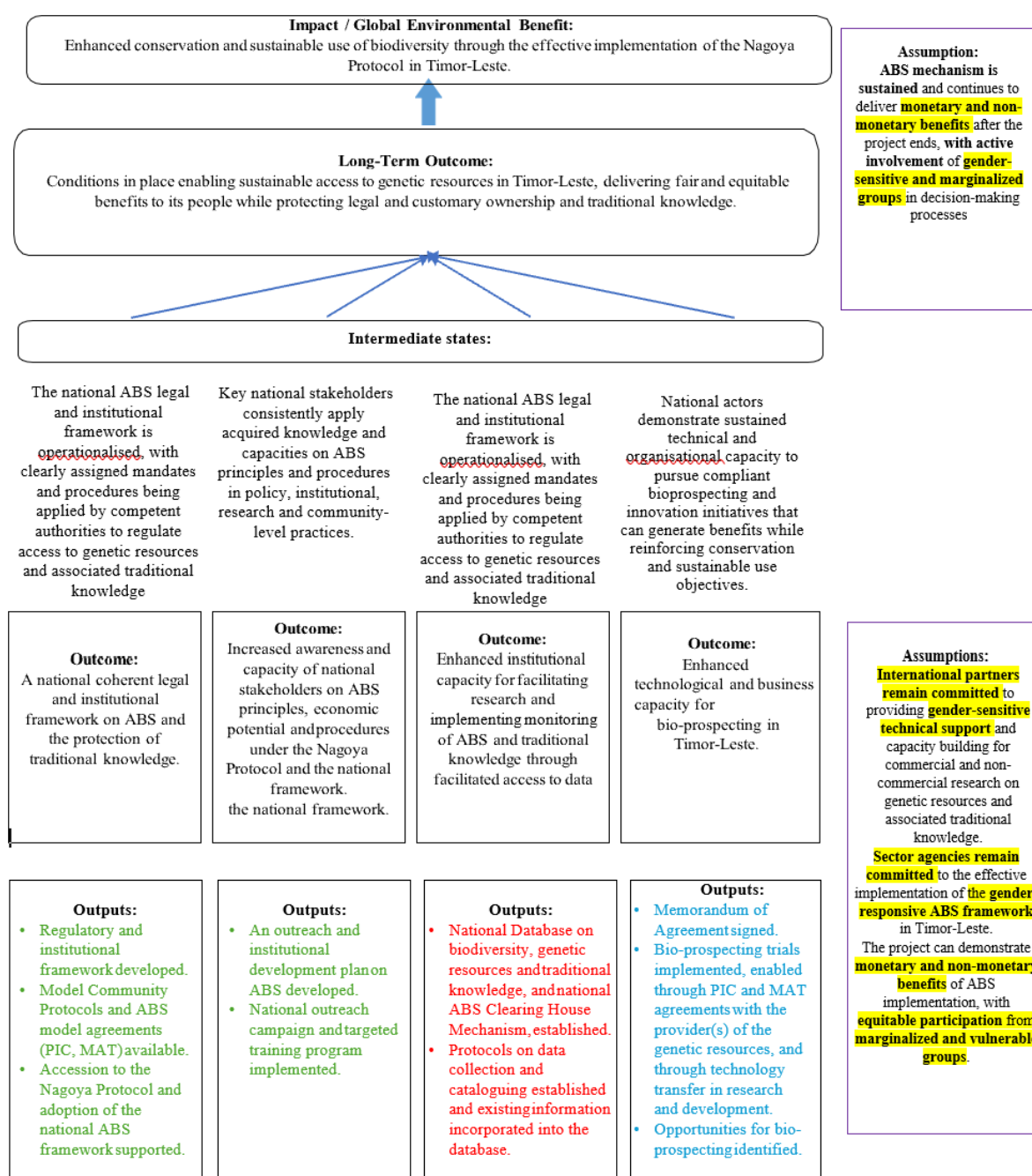
Standard risk statement on potential natural disasters (Appendix 3).	No major natural disaster disrupts community work, TK documentation or field operations.	Clarified assumption given disaster vulnerability and field dependence in TL
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Causal Pathways:

The RTOC visualizes the project's intervention logic through three primary causal pathways that converge to drive the intermediate states:

- The "Soft" institutional pathway (Component 1): this pathway posits that by producing a National ABS Law, Operational Guidelines, and Community Protocols (ex. Outputs 1.1.1–1.1.3), and by building stakeholder awareness (ex. Outputs 1.2.1–1.2.3), the project creates an enabling environment. The primary driver in this case is the political will to advance legislation. A critical assumption is that the institutional arrangements remain stable despite government restructuring - an assumption that was tested severely during implementation.
- The "Hard" technical pathway (Component 2): this pathway focuses on infrastructure and data. It assumes that establishing a National Biodiversity Database and Clearing House Mechanism (Output 2.1.1) and upgrading laboratory facilities (Output 2.2.1) will lead to enhanced national capacity for monitoring and research (Outcome 2.1). The transition to the Intermediate State (Routine Use) depends on the driver of sustained resource allocation for database maintenance and laboratory consumables.
- The "Proof of Concept" pathway (bioprospecting): by facilitating pilot bioprospecting trials and negotiating PIC/MAT agreements (Output 2.2.2), the project aims to demonstrate the economic value of ABS (Outcome 2.2). This serves as a feedback loop, reinforcing the political will in Pathway 1. A key assumption here is that research and business demand for Timor-Leste's genetic resources remains stable.

Figure 3: Theory of Change at review



Soft institutional pathway

Hard technical pathway

Proof of concept / bioprospecting pathway

(Modifications in yellow)

Drivers and Assumptions

53. The review made specific adjustments to the drivers and assumptions to reflect the project's reality, particularly regarding inclusivity and political stability.

- Drivers (external factors): the explicit commitment of international partners (such as the Indonesian Research Agency - BRIN) to provide technical backstopping was identified as a critical driver for overcoming local capacity deficits and the initial withdrawal of other stakeholders. Similarly, the willingness of customary authorities to

collaborate in ABS processes was elevated from an assumption to a driver, acknowledging their active agency in the process.

- Assumptions (gender & human rights): while the ProDoc included a gender marker of 2a, it lacked specific results statements on equality. Therefore, consistent with UNEP guidance, the RTOC includes the explicit assumption that "Women and men participate equitably in ABS consultations and benefit-sharing processes". This ensures the review assesses whether the "soft" framework effectively protects the rights of women as primary holders of traditional knowledge, rather than just delivering technical outputs.
 - Assumptions (political/institutional): the original assumption that "sector agencies remain committed" was expanded to include "political stability is maintained," highlighting the risk posed by frequent ministerial reshuffles which often led to the loss of "institutional memory" regarding ABS protocols.
54. The ToC reconstruction process highlighted a design gap regarding the "missing middle": the original logic jumped from "enhanced capacity" (Outcome) directly to "enhanced conservation" (Impact). It underestimated the time and behavioural changes required to operationalise complex ABS mechanisms. For instance, while the project successfully delivered the tools (database, law drafts), the RTOC clarifies that the Intermediate State of "routine application" necessarily requires a shift in bureaucratic culture (e.g., from paper to digital systems) and sustained national budget allocation, which were not quite secured at project closure.

IV. REVIEW FINDINGS

55. This chapter is organized according to the review criteria presented in the Terms of Reference (TORs) and reflected in the project performance ratings table. The Review Findings section provides a summative analysis of all triangulated data relevant to the parameters of the criteria. Review findings are objective, relate directly to the review objectives and strategic questions, are easily identifiable, clearly stated, and supported by sufficient evidence. This is the main substantive section of the report and incorporates indicative evidence as appropriate. "Factors Affecting Performance" are discussed as appropriate within each of the review criteria as cross-cutting issues (see section IV.I below). Ratings are provided at the end of the assessment of each review criterion, and the complete ratings table is included under the Conclusions (section V.A) below.

A. Strategic Relevance

Alignment to UNEP's UNEP Medium Term Strategy²³(MTS), Programme of Work (POW) and Strategic Priorities

56. The project is Highly Satisfactory in its alignment with UNEP's strategic priorities. It directly contributes to the Environmental Governance sub-programme by supporting Timor-Leste in developing the legal and institutional frameworks necessary to implement Multilateral Environmental Agreements (MEAs), specifically the Nagoya Protocol [DOC_52]. The project also aligns with the Bali Strategic Plan for Technology Support and Capacity Building through its heavy focus on training government staff and upgrading laboratory infrastructure for genetic research.

Table 8: Alignment to the UNEP Medium Term Strategy (MTS), Programme of Work (POW), and Strategic Priorities

UNEP strategic document	Alignment with UNEP's mandate and thematic priorities	Level of alignment <i>full, partial, or not at all</i>
MTS (2018-2021 & 2022-2025)	Sub-programme: Environmental Governance / Nature Action: the project aligns fully with the MTS objective of strengthening national institutions and legal frameworks to implement Multilateral Environmental Agreements (MEAs). It directly supported Timor-Leste in meeting its obligations under the Nagoya Protocol (CBD) by: - developing the National ABS Law and Decree Law (Outcome 1.1) - establishing/strengthening the Competent National Authority (CNA) and ABS Technical Committee.	Full
POW (2020-2021 & 2022-2023)	Direct Outcome: Institutional capacities enhanced: The project contributed directly to the POW indicator on the "number of countries that have enhanced institutional capacity and legal frameworks with the development of the "National Biodiversity Database" and "ABS Clearing House Mechanism" (Component 2),	Full

²³ UNEP's Medium-Term Strategy (MTS) is a document that guides UNEP's programme planning over a four-year period. It identifies UNEP's thematic priorities, known as Sub-programmes (SP), and sets out the desired outcomes, known as Expected Accomplishments (EAs), of the Sub-programmes. <https://www.unenvironment.org/about-un-environment/evaluation-office/our-evaluation-approach/un-environment-documents>.

	which are critical tools for valuing and monitoring biodiversity as per the Nature Action sub-programme.	
Bali Strategic Plan for Technology Support and Capacity Building	Focus on technology transfer & capacity building: the project is a concrete implementation of this plan through: - technology support: transfer of IT infrastructure for the National Biodiversity Database (custom-built for Timor-Leste) and procurement of specialised laboratory equipment for the National Directorate of Biodiversity - capacity building with extensive technical training delivered to government staff (SSE, MAF) and university researchers on taxonomy, bioprospecting contracts (MAT/PIC), and database management.	Full
South-South Cooperation	Exchange between developing countries. The project demonstrates strong adaptive management by pivoting to regional partners for technical delivery: - Indonesia: following delays with Australian partners, the project engaged the Indonesian National Research and Innovation Agency (BRIN) to provide critical technical assistance on taxonomy and database protocols - Malaysia: a high-level delegation visited the Sarawak Biodiversity Centre (SBC) in March 2023 to learn practical lessons on ABS frameworks and bioprospecting commercialization, directly applying these lessons to Timor-Leste's legal drafting.	Full

Alignment to Donor/GEF/Partners Strategic Priorities

57. The project is fully consistent with the GEF-6 Biodiversity Focal Area, specifically Program 8, which focuses on implementing the Nagoya Protocol on Access and Benefit Sharing (ABS). By targeting the development of national ABS frameworks and facilitating the discovery of nature-based products, the project directly addresses the GEF's mandate to prevent the loss of biodiversity while ensuring equitable benefit sharing.

Table 9: Alignment to Donor/GEF/Partner Strategic Priorities

Donor or partner strategic document	Alignment with donor or partner strategic priorities	Level of alignment <i>full, partial, or not at all</i>
GEF-6 Biodiversity Focal Area Strategy	The project is directly derived from Program 8: Implementing the Nagoya Protocol on Access and Benefit Sharing. Its logical framework (Outcome 1.1: legal framework; Outcome 2.2: bioprospecting) mirrors the GEF-6 strategy to preventing the loss of biodiversity by ensuring fair and equitable benefit sharing.	Full
Government of Timor-Leste (Partner)	The project aligns with the National Biodiversity Strategy and Action Plan (NBSAP 2011-2020), specifically Strategic Action 16, which calls for the "development of national policy and laws on Access and Benefit Sharing." It also operationalizes the Biodiversity Decree Law (No. 6/2020), which provides the overarching mandate for biodiversity	Full

	conservation but required specific ABS regulations to be enforceable.x ²	
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Relevance to Global, Regional, Sub-regional and National Priorities

58. The project is highly relevant to Timor-Leste's national development goals. It supports the implementation of the National Biodiversity Strategy and Action Plan (NBSAP), particularly Strategic Action 16 on developing ABS policies. Furthermore, it underpins the operationalisation of the Biodiversity Decree Law (2017) and the 2022 Decree Law on Biodiversity, which provide the high-level legal basis for ABS but also requires specific regulations to be enforceable.

Table 10: Relevance to Global, Regional, Sub-regional and National Environmental Priorities

Strategic document or agreement	Alignment with global, regional, sub-regional, national environmental priorities	Level of Alignment <i>Full, partial, or not at all</i>
Convention on Biological Diversity (CBD)	The project directly contributes to Aichi Biodiversity Target 16, which states that "the Nagoya Protocol is in force and operational, consistent with national legislation." The project's primary output (the National ABS Law) is the prerequisite for Timor-Leste to meet this global obligation.	Full
Sustainable Development Goals (SDGs)	The project contributes to SDG 15 (Life on Land), specifically Target 15.6: "Promote fair and equitable sharing of the benefits arising from the utilization of genetic resources and promote appropriate access to such resources."	Full
CPLP (Community of Portuguese Language Countries) Environmental Strategy	Relevant to regional cooperation among CPLP nations. The project facilitated legal drafting in Portuguese and engaged legal experts familiar with the lusophone civil law system, ensuring regional legal coherence.	Partial

Complementarity with Existing Interventions/Coherence

59. The project design identified clear synergies with other initiatives, such as the UNDP-GEF Cross-Cutting Capacity Development (CCCCD) project and the EU-funded Ai Ba Futuru (Partnership for Sustainable Agro-Forestry). However, during implementation, the alignment with these partners faced challenges. For instance, the expected co-financing and operational synergy with the EU project did not fully materialize as the project cycles became misaligned due to delays. Conversely, new partnerships with the Indonesian National Research and Innovation Agency (BRIN) were forged to fill technical gaps left by other partners, demonstrating adaptive complementarity.

Table 11: Complementarity with existing interventions/coherence

Other initiatives by UNEP or other organisations	Complementarity (including collaboration, coordination and overlap or duplication)	Level of Alignment <i>Full, partial, or not at all</i>
UNDP-GEF Cross-Cutting Capacity Development (CCCD) Project	Strong Coordination. The ABS project collaborated with the CCCD project to integrate the National Biodiversity Database into the broader "Portal Nasional Ambiental" (SSE website). This avoided duplication of digital infrastructure and ensured the ABS Clearing House is housed within the national environmental portal.	Full
EU / GIZ "Ai Ba Futuru" (Partnership for Sustainable Agro-Forestry)	Misalignment. The project design planned for strong complementarity (co-financing) with this EU project. However, due to significant delays in the ABS project startup, the EU project cycle concluded (2022) before joint bioprospecting activities could be fully implemented. The intended synergy was only partially realised if not at all.	Partial / not at all
Conservation International (CI) - Timor-Leste	Adaptive Partnership. While originally a collaborator, CI stepped up to become a primary executing partner for Outcome 1.2 and 2.2 when government capacity gaps were identified. CI led the community engagement in Larisula and Macadade, ensuring the "Bio-Community Protocols" were developed using their existing field networks.	Full
BRIN (National Research and Innovation Agency, Indonesia)	New Strategic Partner. Following the unavailability of the original partner (MAGNT Australia), the project forged a new south-south cooperation with BRIN. This partnership was critical for providing technical training on taxonomy and database management, filling a major gap in the project's coherence strategy.	Full

60. Overall, the project built the entire Access and Benefit Sharing (ABS) system for Timor-Leste from scratch. Before this intervention, the country had signed international agreements but lacked the practical tools to enforce them. The project delivered the necessary draft laws, a National Biodiversity Database with over 4,000 records, and the (soon-delivered) country's first laboratory dedicated to bioprospecting. This contribution has transformed the Nagoya Protocol from a paper agreement into a working system, allowing Timor-Leste to finally assert control over its genetic resources .

61. Regionally, the project proved the value of south-south cooperation. Instead of relying solely on distant experts, the project partnered with neighbours like Indonesia (BRIN) and Malaysia (at least at project's start-up). This approach transferred technology and skills—such as database management and plant sampling - using partners who shared similar ecological challenges and cultural contexts. This made the training more effective and sustainable for the Timorese staff.

Findings Statements on Strategic Relevance and Complementarity

62. Finding 1: the project is Highly Relevant because it bridged the gap between high-level government policy and daily operations. While the 2020 Biodiversity Decree Law existed on paper, the project provided the actual "mechanism" to run it - specifically the operational regulations and the digital database. This ensured that the legal framework was supported by real technical tools.

63. Finding 2: the project's strategic pivot to south-south cooperation was a key success factor, especially with BRIN. When original partnerships with Australian institutions faced delays, the project successfully switched to Indonesian partners. This decision not only saved the project's technical components but also improved capacity building, as regional partners offered expertise that was linguistically and culturally easier for local staff to absorb.

Rating for Strategic Relevance: Highly Satisfactory

Rating for Alignment to UNEP MTS, POW and Strategic Priorities: Highly Satisfactory

Rating for Alignment to Donor/GEF/Partner Strategic Priorities: Highly Satisfactory

Rating for Relevance to Global, Regional, Sub-regional and National Priorities: Highly Satisfactory

Rating for Complementarity with Existing Interventions/Coherence: Satisfactory

B. Quality of Project Design

64. Below is a detailed review of the project's design based on key aspects:

Table 12: Summary of quality of project design assessment ratings

	SECTION	RATING (1-6)	Summary Assessment
A	Project Preparation	4	The ProDoc presents a clear problem and situational analysis supported by stakeholder mapping. However, the analysis of marginalised groups and gender was limited, and procurement complexity was significantly underestimated.
B	Risk identification and Safeguards	3	A risk log was included, but it underestimated critical contextual risks such as political instability, laboratory infrastructure fragility, and co-financing volatility. Safeguards for traditional knowledge were present but social conflict sensitivity was less developed.
C	Governance and Supervision Arrangements	4	Governance arrangements and roles (MDIR, UNTL, CI) were clearly described. However, the design did not sufficiently account for the high risk of institutional turnover which later affected the stability of these arrangements.
D	Partnerships	4	Roles for initial technical partners (e.g., MAGNT) were defined, though capacity assessments were basic. The design did not foresee the need for the adaptive partnerships (e.g., BRIN, GBIF) that later became necessary.
E	Strategic Relevance	5	The project demonstrates high strategic alignment with CBD/Nagoya obligations, GEF-6 priorities, and national biodiversity strategies, addressing both national needs and international commitments.
F	Logical Framework and Causality	4	The results hierarchy is logical and coherent, providing a solid basis for the Theory of Change. Weaknesses included a lack of gender-specific indicators and missing baselines for capacity and awareness outcomes.
G	Financial Planning	4	Comprehensive budget and procurement plans were included. However, assumptions regarding the timely materialisation of co-financing were overly optimistic, and procurement timelines were unrealistic.
H	Efficiency	3	While activity sequencing was outlined, efficiency risks related to laboratory reconstruction and specialised procurement were

			underestimated. No specific cost-effectiveness analysis was provided.
I	Monitoring	4	The monitoring plan was funded and structured, but baselines for key capacity indicators were incomplete, and data disaggregation for gender/vulnerable groups was initially absent.
J	Sustainability / Replication and Catalytic Effects	4	Institutional anchoring within government agencies was well-proposed. However, the long-term financial and technical capacity required to sustain complex infrastructure (labs, databases) was not fully analysed.
K	Learning, Communication and Outreach	4	Basic plans for awareness and dissemination were included, though a more explicit knowledge management strategy linking lessons to regional channels would have strengthened the design.
	Total (Weighted) Score:	3.92	(Full analysis in the Inception Report, available from the Project/Task Manager)

65. The project design was strategically sound and logically coherent, demonstrating a strong problem analysis that clearly identified the lack of legal and technical capacity as the primary barrier to implementing the Nagoya Protocol in Timor-Leste. A key strength was its high strategic relevance, aligning perfectly with national biodiversity priorities and GEF-6 objectives. The intervention logic was well-structured, effectively linking "soft" legal outcomes (drafting laws) with "hard" technical outputs (databases and laboratories) to create a comprehensive enabling environment. Additionally, the design anticipated strong technical partnerships, which provided a credible foundation for the proposed capacity-building activities.

66. However, the design suffered from optimism bias regarding risks and resources. Significant weaknesses included the underestimation of contextual risks - specifically political instability and the fragility of physical infrastructure - and over-optimistic co-financing assumptions that did not fully account for the institutional volatility of partners. Furthermore, the design lacked a robust gender and social inclusion analysis, failing to include specific baselines or indicators for women and vulnerable groups, which limited the project's ability to monitor equitable participation. While the legal framework was well-planned, the long-term financial and technical sustainability of the high-tech outputs (biodiversity database and laboratory) was also insufficiently analysed, creating challenges for their post-project operationalisation.

Rating for Project Design: Moderately Satisfactory

C. Nature of the External Context

67. The project was implemented within a volatile political and institutional environment. The implementation period saw frequent administrative restructuring within the government, specifically affecting the lead executing agencies (transitioning from MDIR to the Ministry of Tourism and Environment). This instability resulted in the frequent turnover of focal points and a loss of "institutional memory," compelling the PMU to repeatedly re-engage with new decision-makers, which significantly delayed the validation of legal drafts. Additionally, the project faced challenges regarding the withdrawal of expected stakeholders and the volatility of co-financing commitments. Design assumptions regarding the capacity and stability of initial partners proved overly optimistic, and the non-materialisation of committed co-funding required the project to pivot toward new partnerships (e.g., BRIN, GBIF) to maintain technical delivery.

68. In addition, the operational context was severely constrained by the COVID-19 pandemic (2020–2022) and infrastructure limitations. The pandemic imposed strict international travel restrictions and domestic lockdowns, which halted the deployment of

international consultants and delayed community consultations and in-person training for nearly two years. These delays were compounded by economic and institutional constraints, specifically the "fragility of laboratory infrastructure" and complex procurement cycles. The underestimation of these logistical barriers at the design stage meant that the project had to navigate significant hurdles to procure specialised equipment for rental for demonstration and operationalise the national biodiversity database under conditions of limited connectivity and technical support.

Rating for Nature of the external context: Unfavourable

D. Effectiveness

Table 13: Availability of outputs

	Narrative Assessment	Sources of Information / Evidence
Component 1: Development of national legal and institutional ABS framework		
Outcome 1.1 Legal Framework		
Output 1.1.1: National regulatory, policy and institutional framework developed and facilitated towards adoption by the government for implementation of the Nagoya Protocol through a process of national consultations, a government brief and National Operational Guidelines. Performance against Indicator(s) and Target(s) Comprehensive ABS framework developed and facilitated. Fully delivered (technical) / Not Adopted. The project successfully produced the "Ratification Package" containing the Draft Law, Decree Law, and Guidelines (100% technical completion). However, the "adoption" target was missed due to administrative issues by project's end. Other information, not related to the indicators, that demonstrates Output delivery: The National Directorate of Biodiversity was formally designated as the Competent National Authority (CNA), and the ABS Technical Committee was established by ministerial decree on 09 October 2023. However, interviews reveal the Committee is currently "ad hoc" and inactive because no commercial proposals exist to trigger its review function. All legal drafts were translated into Tetum and Portuguese to ensure accessibility for local lawmakers and stakeholders. Other information, not related to the indicators, that demonstrates Output delivery: A major bottleneck for adoption was the government's refusal to accept electronic submissions of the legal package. The insistence on physical hard copies contributed directly to the "loss" of the ratification dossier	The project delivered a comprehensive regulatory package, translated into Tetum and Portuguese to ensure local utility. The Competent National Authority (CNA) (National Directorate of Biodiversity) and ABS Technical Committee were formally established by ministerial decree in October 2023. Delivery was significantly delayed by COVID-19 and political restructuring. While the technical quality of the legal drafts was validated by independent experts, the utility is currently nullified by the lack of parliamentary adoption. Interviews reveal administrative dysfunction. The hard-copy "Ratification Package" was "physically lost" during a ministerial handover/office move, forcing the PMU to reprint and resubmit the entire dossier. Additionally, the Technical Committee is described as "ad hoc" and practically dormant because no legal commercial proposals exist to trigger its function yet. Level of delivery: fully delivered (technical products only)	-Primary data: interviews -Secondary data (reports): PIR 2024, Semi-Annual Report 2024

during a ministerial office move, forcing the project team to reprint and physically resubmit the entire stack of documents, highlighting a critical lack of institutional memory and digital readiness.		
Output 1.1.2: Nationally agreed model Community Protocols developed based on local indigenous practices, beliefs and customary law to guide access to traditional knowledge associated with genetic resources. Performance against Indicator(s) and Target(s) Model protocols developed for 2 pilot sites. Protocols were successfully piloted in Larisula (terrestrial) and Macadade (marine) communities by Conservation International (CI). Other information, not related to the indicators, that demonstrates Output delivery: Stakeholders noted a complex legal challenge regarding Traditional Knowledge (TK). Because some medicinal plant knowledge is shared across village boundaries (e.g., between Larisula and neighbouring sucos), it is considered a "public good" under current interpretation, making it difficult for a specific community to claim exclusive benefits without the Nagoya Protocol's specific legal protections in place.	Two community protocols were developed involving extensive consultation with traditional leaders (Lia Nain). These protocols define the local procedure for "Prior Informed Consent" (PIC) The utility of the associated Traditional Knowledge (TK) documentation is intentionally restricted. While TK inventories were created, stakeholders revealed a deliberate decision not to publish this data on the public database. It is kept in offline "booklets" because the government and communities fear biopiracy (theft of knowledge) in the absence of a ratified Nagoya Protocol to legally protect them. This limits the immediate utility of the output for broader research but protects beneficiary rights. Completed in late 2023 after delays in subcontracting CI. Level of delivery: fully delivered	-Primary data: interviews -Secondary data (reports): PIR 2024
Output 1.1.3: National-specific ABS model agreements (PIC, MAT) developed that facilitate the negotiation of monetary and non-monetary benefits between users and providers of genetic resources. Performance against Indicator(s) and Target(s) Model PIC/MAT agreements developed. Fully Delivered. 12 specific PIC/MAT agreements were drafted to facilitate the project's own bioprospecting trials. Other information, not related to the indicators, that demonstrates Output delivery: To bypass the delay in ratification, the private partner (Nimura Genetic Solutions) proposed using a "Certificate of Compliance" as an interim measure to facilitate access. However, this proposal was rejected by the Competent National Authority (CNA) due to perceived legal risks, leaving the model agreements as theoretical drafts rather than active permits.	Standard templates for Prior Informed Consent (PIC) and Mutually Agreed Terms (MAT) were produced and integrated into the National Operational Guidelines. 12 specific PIC/MAT agreements were drafted and used to facilitate the project's own bioprospecting trials with research partners (e.g., local universities and BRIN). However, these remain "research-only" agreements. These models were tested during the project's pilot research (Outcome 2.2). However, interviews highlight that these remain "prototype" agreements. No commercial MAT has been signed because there is no legal mechanism to enforce it until the law is passed. The agreements currently serve purely academic/research purposes. Drafts were reviewed by legal consultants to ensure alignment with the Nagoya Protocol. Level of delivery: fully delivered	-Primary Data (Interviews): -Secondary Data (reports): PIR 2024: reports 100% completion
Output 1.1.4: High-level dialogue established with policy makers and Parliament to make the case for the Nagoya Protocol and the national ABS framework, emphasising their potential for adding value through	The project organised high-level seminars, including an international workshop inviting speakers from ASEAN neighbours (Malaysia, Indonesia, Philippines) to showcase the economic benefits of ABS.	-Primary data: interviews -Secondary Data

research & development, and their contribution to the Sustainable Development Goals (SDGs). Performance against Indicator(s) and Target(s) Regular high-level consultations held. Seminars were held, but the ultimate target of "Submission to Parliament" was not achieved during the project's life cycle. Other information, not related to the indicators, that demonstrates Output delivery: Project staff highlighted that advocacy effectiveness was structurally limited by UNEP's status as a "non-resident" agency. Unlike UNDP, which has a permanent in-country presence to maintain daily pressure on parliamentarians, UNEP's remote management made it harder to sustain the "high-level dialogue" required to keep the Nagoya Protocol on the political agenda amidst shifting priorities.	While awareness increased among technical staff, political will at the highest level shifted. Interviews indicate that government attention was diverted toward ASEAN accession, de-prioritising the Nagoya Protocol. The "non-resident" status of UNEP was cited as a barrier to maintaining consistent high-level advocacy. High-level engagement was sporadic and often delayed by the frequent turnover of government officials (Ministerial changes). Level of delivery: partially delivered	(reports): PIR 2024
Output 1.1.5: Information required for formal accession to the Nagoya Protocol made available to the Government of Timor-Leste and accession process started. Performance against Indicator(s) and Target(s) Compilation of documents for accession. A complete "Ratification Package" was compiled, including the Law, Decree, and Government Brief. Other information, not related to the indicators, that demonstrates Output delivery:	The project compiled all necessary legal and technical documents into a single dossier required by the Ministry of Foreign Affairs (MNEC) for accession. The "accession process started" but stalled. The project faced archaic administrative hurdles, such as the rejection of electronic submissions and the requirement for hard copies, which were subsequently lost between the Ministry of Tourism (MTE) and Foreign Affairs. This required the PMU to physically reprint and resubmit the dossier, causing months of delay. The dossier was reviewed by the Ministry of Foreign Affairs (MNEC) with no objection, technically clearing it for the Council of Ministers, where it currently sits Level of delivery: fully delivered (dossier completed)	-Primary data: Interviews -Secondary data: Semi-Annual Report 2024
Outcome 1.2 Awareness & Capacity		
Output 1.2.1: An outreach and institutional development plan on ABS issues prepared in Tetum language based on needs assessments. Performance against Indicator(s) and Target(s) Plan developed and materials in Tetum. The outreach plan was finalised in 2023 based on a needs assessment conducted during the 1st National Workshop. Awareness materials (brochures, X-banners) were produced in Tetum.	The project conducted a "Capacity and Awareness Survey" during the 1st National Workshop (April 2023) to establish a baseline. Based on this, a comprehensive Outreach Plan was developed targeting government, academia, and local communities. The output was significantly delayed. Originally planned for Year 1-2, this foundational activity was only completed in Year 4 (2023), meaning	-Primary data: interviews -Secondary data (reports): PIR 2024, Semi-Annual Report 2023

Other information, not related to the indicators, that demonstrates Output delivery: To ensure communities received immediate tangible value, the project produced high-quality photo booklets of the local flora documented in Larisula and Macadade. These were returned to the communities as a knowledge product, countering the common "extractive" research model where data is taken but never shared back with local owners.	the project operated without a structured outreach strategy for most of its duration. High local utility due to translation. The project produced specific booklets on plant specimens from Larisula and Macadade in Tetum, directly feeding back research results to the communities in their own language. It was validated by the Project Steering Committee. Level of delivery: fully delivered	
Output 1.2.2: National outreach campaign implemented on the provisions of the Nagoya Protocol, the evolving national ABS framework, and the role of ABS for genetic resource-based innovation and adding value in meeting the SDGs Performance against Indicator(s) and Target(s) Campaign implemented; multi-stakeholder network established. A "Biodiversity Working Group" was established in Jan 2023. Social media channels (Facebook, Instagram) were launched in July 2023. Other information, not related to the indicators, that demonstrates Output delivery: The "outreach" extended to informal market testing of bioprospecting products. For example, the <i>Aruda</i> (medicinal herb) balm developed by the project was promoted via "WhatsApp status" updates by project staff and university partners, revealing strong informal demand for the product even in the absence of a formal commercial campaign.	The campaign included digital outreach (social media) and physical events (community sessions in pilot sites, school drawing competitions). The "Biodiversity Working Group" (45 people) was revived to serve as the multi-stakeholder network. Interviews suggest the campaign was often "event-based" rather than continuous. Stakeholders noted that high-level engagement was sometimes difficult, with invited high-level officials sending subordinates ("only the sender" [sic] / subordinates attending). Specific sessions were held for women and youth in Larisula and Macadade, ensuring gender-responsive outreach. It was compressed into the final 18 months of the project. Level of delivery: fully delivered	-Primary Data: interviews, visual verification (Facebook) -Secondary Data (reports): PIR 2025, PIR 2024
Output 1.2.3: Targeted training carried out for 50 staff of the Competent National Authority, the Competent Sector Authorities, the National Focal Point and related research agencies on national institutional, regulatory and implementation framework for ABS. Performance against Indicator(s) and Target(s) 50 staff trained. Fully Delivered. A major training on the regulatory framework was conducted on 26-27 June 2023 with 52 participants.	Training covered the new Draft Law, Decree Law, and technical procedures (PIC/MAT). Participants included high-level officials (Director Generals, Rectors) and technical staff from MAF, MoH, and Universities (ICS, UNDIL, UNPAZ) While attendance targets were met, interviews highlight a language barrier. Furthermore, technical partners noted that the depth of capacity building was fundamentally constrained by the participants' lack of scientific backgrounds. Because most attendees were general	-Primary Data: interviews -Secondary Data (reports): PIR 2024

Other information, not related to the indicators, that demonstrates Output delivery: Due to the severe delays in procuring laboratory equipment, the project could not train staff in the government facility as planned. Instead, the project had to rent a private "mobile genomic laboratory" to conduct the mandatory hands-on training in Dili, ensuring capacity building proceeded despite the infrastructure failure.	government administrative staff rather than active researchers, many struggled to grasp highly technical concepts such as biological data curation and taxonomy such as in the case of BRIN. Furthermore, the utility of the training is currently theoretical; staff are trained on a law that has not yet been passed, risking skills decay before implementation can begin. Additional "hands-on" training was provided to IT staff for the database (Outcome 2.1), complementing this output. Level of delivery: fully delivered	
Component 2: Operationalisation of ABS for research and monitoring		
Outcome 2.1 Monitoring & Database		
Output 2.1.1: Consolidated National Database on biodiversity, genetic resources and traditional knowledge, and national ABS Clearing House Mechanism, established. Performance against Indicator(s) and Target(s) National Database and ABS CHM established. Both platforms are online and functional. The National Biodiversity Database (biodiversity.mta.gov.tl) contains approximately 5,000 records of plants, animals, and microbes. The ABS Clearing-House Mechanism (abschm.mta.gov.tl) is established as a portal for legal information and permit tracking Other information, not related to the indicators, that demonstrates Output delivery: The sustainability of the database is threatened by a lack of secured long-term hosting funds. The Technical Lead expressed concern that without a specific government budget line for web hosting and domain renewal, the platform risks becoming a "digital cemetery" – technically perfect but inaccessible/offline within months of project closure.	The project built Timor-Leste's first digital biodiversity repository from scratch. It features auto-generated statistics (species counts by municipality) and mapping tools. Unlike typical scientific databases, which are often highly technical, this was designed with a user-friendly interface to be accessible to students, government staff, and non-specialists. Delayed output: the platforms were finalised in late 2023/early 2024 due to initial delays in contracting the IT company and the withdrawal of the original partner (MAGNT Australia). While the system is technically robust and hosted on government servers (ensuring ownership), its daily utility is threatened by infrastructure fragility. Interviews reveal that Ministry staff often lack stable Wi-Fi access ("no Wi-Fi for us" in the office), making routine cloud-based updates difficult. Consequently, the database currently functions more as a static "catalogue" than the dynamic monitoring tool envisioned. A MoU was signed with the Global Biodiversity Information Facility (GBIF) to ensure data standards and long-term integration with global networks.	-Primary Data: interviews, visual verification (sites accessed at https://biodiversity.mta.gov.tl/ and https://abschm.mta.gov.tl/) -Secondary Data (reports): PIR 2025, Semi-Annual Report 2024

	Level of delivery: fully delivered	
Output 2.1.2: Protocols established for the National Database and the national ABS Clearing House Mechanism on collecting, cataloguing, permitting and monitoring of fair access to scientific records and traditional knowledge in Timor-Leste, and existing information incorporated into the database. Performance against Indicator(s) and Target(s) Protocols developed and existing info incorporated. Five specific protocols were developed (Collecting, Cataloguing, Permitting, Reporting, and TK Documentation). "Repatriation" of data was successful, digitising legacy collections from Portugal, Indonesia, and the Netherlands. Other information, not related to the indicators, that demonstrates Output delivery: The shift from the original Australian partner (MAGNT) to the Indonesian partner (BRIN) was driven not just by timelines but by political alignment. The Steering Committee questioned the logic of learning ABS protocols from Australia, which is not a party to the Nagoya Protocol, whereas Indonesia is a regional leader in its implementation, making the new partnership strategically more relevant.	Adaptive management: the project successfully pivoted to south-south cooperation after the original technical partner (MAGNT Australia) withdrew due to timeline incompatibilities. The Indonesian National Research and Innovation Agency (BRIN) was engaged to provide the necessary protocols and taxonomy training, which was highly effective due to similar ecological contexts. While protocols for documenting TK were applied in pilot sites (Larisula/Macadade), there was a deliberate decision not to publish this specific dataset online. It is currently kept in offline "booklets." Stakeholders and the government fear biopiracy because the Nagoya Protocol has not yet been ratified to provide legal protection for this knowledge. This restricts the immediate utility of the database regarding TK but protects community rights. "Hands-on" training was provided to two dedicated staff members, though high turnover remains a risk. Level of delivery: fully delivered	-Primary Data: interviews, project review (confirmed BRIN (Indonesia) replaced MAGNT for protocol development) -Secondary Data (reports): PIR 2025, Semi-Annual Report 2024
Outcome 2.2 Bioprospecting & Technology		
Output 2.2.1: Memorandum of Agreement on Technical Collaboration signed between MDIR/MAF/UNTL and Nimura Genetic Solutions (NGS Japan) on multiple-year collaborative research and capacity building for bio-prospecting. Performance against Indicator(s) and Target(s) The MoA was signed on 05 January 2022, formalising the partnership. Other information, not related to the indicators, that demonstrates Output delivery:	This output provided the legal and technical foundation for the "proof of concept" trials. It included a high-level study tour to the Sarawak Biodiversity Centre (Malaysia) for Timorese decision-makers (Director General, National Director) to observe a functioning ABS model, which stakeholders cited as a key learning moment. This was relatively early during implementation after COVID (Jan 2022), allowing time for the trials to proceed despite other delays. The partnership with NGS was also crucial for the technical design of the bioprospecting trials, although the actual "technology transfer" was limited by the lack of a local laboratory (see Output 2.2.2). Level of delivery: fully delivered	-Secondary Data (reports): PIR 2024, semi-annual report 2024

Output 2.2.2: Bio-prospecting trials implemented, enabled through PIC and MAT agreements with the provider(s) of the genetic resources, and through technology transfer in research and development. Performance against Indicator(s) and Target(s) Trials implemented and technology transferred. Four "prototype" products were developed (e.g., <i>Aimuro</i> mouthwash, bio-fertiliser). However, the "technology transfer" was severely compromised by the failure to operationalise the National Laboratory. Other information, not related to the indicators, that demonstrates Output delivery: To bypass the lack of government lab capacity, the project issued small sub-grants to private universities (UNDIL, UNPAZ, ICS). This decentralised approach allowed the development of four specific prototypes (e.g., mouthwash, bio-fertiliser, anti-itch balm) by leveraging the universities' own (albeit limited) facilities and student researchers.	While "trials" were conducted, interviews reveal they relied on unsustainable workarounds. Because the National Biodiversity Laboratory was not operational (renovation partially completed with lacking electricity/cabling and installed equipment), the project had to ship samples to Indonesia (PUSLABFOR/BRIN) for chemical analysis (LCMS) or rent a "mobile genomic laboratory" for temporary training. This provided "one-off" results rather than building permanent domestic capacity. The procurement of critical laboratory equipment remains unfinished at the time of the terminal review, significantly undermining the "technology transfer" objective of Output 2.2.2. Interviews reveal a systemic disconnect between the technical requirements and the administrative procurement processes. The PMU faced severe hurdles where technical specifications provided by the Biodiversity Directorate were not effectively processed by the Ministry's Procurement Directorate. Furthermore, the delay created a mismatch between the original budget allocations and current market prices (inflation), complicating the acquisition of specialised instruments like PCR machines and rotary evaporators. Stakeholders noted that while funds were theoretically allocated (approx. USD 128,000 listed as account payable/budgeted), the equipment had not physically arrived or been installed by the project's operational closure. Consequently, the project had to resort to unsustainable stop-gap measures, such as shipping samples to Indonesia (PUSLABFOR/BRIN) for analysis or renting a "mobile genomic laboratory" from a private provider to conduct mandatory training, rather than training staff on their own permanent equipment. Zero commercialisation has been achieved so far as University partners (UNDIL, ICS and UNPAZ) noted that without a ratified ABS Law, they cannot sign commercial contracts with private companies, leaving the prototypes as academic exercises. 12 PIC/MAT agreements were drafted to cover these research activities, but they remain non-commercial/research-only agreements.	-Primary Data : interviews -Secondary Data (reports): PIR 2025
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	Level of delivery: partially/not delivered	
Output 2.2.3: Existing and new opportunities for bio-prospecting projects in e.g. the agricultural, crop protection, food/beverage, botanical, cosmetics or pharmaceutical industries identified. Performance against Indicator(s) and Target(s) Opportunities assessed and reported. A comprehensive report on bioprospecting opportunities was produced by national and international consultants in late 2024. Other information, not related to the indicators, that demonstrates Output delivery: To ensure the findings of this report received high-level attention, its presentation was strategically "bundled" into a 3-day high-level international workshop. This ensured that senior policymakers, who might ignore a standalone technical report, were present to hear the economic case for bioprospecting.	The output delivered a technical assessment identifying specific sectors (cosmetics, herbal medicine/traditional tea) with high potential. A national workshop was held to disseminate these findings to the private sector and government. The consultants were only hired in June 2024, meaning this foundational analysis arrived at the very end of the project, limiting its ability to guide the actual trials under Output 2.2.2. The report was enriched by the primary data "extracted from the bioprospecting trials" (Output 2.2.2), ensuring it reflected real-world chemical data (e.g., from the Larisula plant samples) rather than just desktop research. Level of delivery: fully delivered	-Secondary Data (reports): PIR 2025, PIR 2024

69. The assessment of output delivery reveals a project that, after facing severe initial stagnation, demonstrated quite some resilience to finalise its core technical products within a very compressed timeframe. While implementation was heavily disrupted between 2020 and 2022 by the COVID-19 pandemic and a critical 1.5-year gap in project leadership, the appointment of a new PMU in late 2022 catalysed a period of accelerated delivery. As detailed in Table 14, the project successfully generated the foundational "soft" infrastructure for ABS - including the full legal framework, community protocols, and digital databases - achieving a technical completion rate near 100% for Component 1. However, the "hard" infrastructure and formal adoption faced persistent bottlenecks. The analysis highlights a distinct dichotomy where technical outputs are *available* (drafted, translated, hosted online), but their actual *utility* is currently constrained by external factors, specifically the pending parliamentary ratification of the ABS Law and significant delays in the procurement of laboratory equipment.

70. Under Component 1, the project delivered a comprehensive "Ratification Package" comprising the draft National ABS Law, Decree Law, and National Operational Guidelines, all translated into Tetum and Portuguese to ensure local ownership. While these outputs successfully close the legal gaps identified at design, the "adoption" target remains unfulfilled due to administrative hurdles - including the reported loss of physical dossiers during ministerial handovers - and shifting political priorities that de-prioritised the Nagoya Protocol in favour of ASEAN accession in late 2025. Similarly, while model Community Protocols were successfully piloted in Larisula and Macadade to protect Traditional Knowledge (TK), the resulting data remains in offline "booklets" rather than the public domain. This restrictive approach was a deliberate decision by stakeholders to prevent biopiracy in the absence of an active legal framework, effectively rendering the output technically complete but operationally dormant.
71. Under Component 2, the project achieved a significant milestone by establishing the National Biodiversity Database and ABS Clearing-House Mechanism, populating them with approximately 5,000 records repatriated from international collections. However, the sustainability of these digital assets is threatened by infrastructure fragility, specifically the lack of stable internet access in government offices, which reduces the database to a static catalogue rather than a dynamic monitoring tool. Furthermore, the "hard" technology transfer targets were severely compromised by the failure to operationalise the National Biodiversity Laboratory. Although renovation works were largely completed, critical delays in the procurement of cabling and scientific equipment forced the project to rely on expensive stop-gap measures - such as shipping samples to Indonesia or renting mobile laboratories - preventing the full realisation of domestic bioprospecting capacity.

Achievement of Project Outcomes

72. Moving beyond the delivery of outputs, the assessment of outcomes examines whether the project successfully translated its technical products into the intended institutional and behavioural changes. As outlined in Table 15, the project's performance presents a mixed picture where the "soft" infrastructure for access and benefit-sharing - legal frameworks, knowledge platforms, and initial capacity - has been fully established, effectively closing the regulatory gaps identified at design. However, the transition to full outcome achievement remains suspended by critical external bottlenecks, most notably the lack of parliamentary ratification, which renders the legal framework dormant, and the infrastructure delays, which have prevented the full operationalisation of technological capacity for bioprospecting.

Table 14: Achievement of project outcomes

Component 1	Results
Outcome 1.1:	National legal and institutional framework on ABS and the protection of traditional knowledge developed and facilitated towards adoption in accordance with the Biodiversity Decree Law
Performance Indicator(s) and Target(s):	Indicators: 1. Number of policies, regulations and procedures developed and facilitated towards adoption. 2. Status of accession to the Nagoya Protocol. Targets: 1. At least 3 developed (Law, Decree, Guidelines). 2. Accession submitted to Parliament.
Sources of Information /Evidence:	PIR 2025 Interview Project Documents

Narrative Assessment:	The project successfully delivered the entire "soft" legal infrastructure required for a national ABS regime. This includes the National ABS Law, Decree Law, and Operational Guidelines, which were drafted, translated (Tetum/Portuguese), and validated by stakeholders. The project directly attributed the creation of the Competent National Authority (CNA) and ABS Technical Committee, neither of which existed prior. The project was the sole driver for these legal instruments. However, the "adoption" aspect of the outcome was not achieved. The transition from "developed" to "adopted" stalled due to external political factors (government restructuring, focus on ASEAN) and administrative failures (lost dossiers). Consequently, while the framework exists technically, it lacks legal force. The project created the enabling environment, but the "Missing Middle" (parliamentary ratification) prevents the outcome from being fully realised in terms of enforcement.
Level of Achievement:	Partially achieved
Outcome 1.2:	Increased awareness and capacity of national stakeholders on ABS principles, economic potential and procedures under the Nagoya Protocol and the national framework
Performance Indicator(s) and Target(s):	<i>Indicators: 1. Number of national stakeholders expressing increased awareness. 2. Number of staff of relevant national agencies participating in implementation.</i> <i>Targets: 1. At least 50 stakeholders (40% women). 2. At least 20 staff (40% women).</i>
Sources of Information /Evidence:	PIR 2025 Survey Data Interviews
Narrative Assessment:	The project exceeded its quantitative targets for awareness. It successfully engaged high-level decision-makers (Director Generals, University Rectors) and community members in pilot sites. The "Biodiversity Working Group" was revived, creating a multi-stakeholder platform. While awareness numbers are high, the "depth" of capacity is mixed. Interviews reveal that technical understanding is sometimes hampered by language barriers (English vs. Tetum/Portuguese) among senior staff. However, the project successfully embedded ABS concepts into university curricula (UNTL, UNDIL), ensuring a <i>credible association</i> with long-term capacity building beyond the project lifespan. Specific efforts were made to include women and youth in Larisula and Macadade, ensuring gender-disaggregated targets were met.
Level of Achievement:	Fully achieved
Component 2	
Outcome 2.1:	Institutional capacity enhanced for enacting Article 17 on 'monitoring' and Articles 8a & 23 on 'promoting research' for sustainable use through consolidation of inventory, cataloguing and fair access to national and internationally held records on biodiversity, genetic resources and traditional knowledge
Performance Indicator(s) and Target(s):	<i>Indicators: Number of entries in the National Database. 2. Number of staff trained in protocols.</i> <i>Targets: at least 1,000 entries. 2. At least 20 staff trained.</i>
Sources of Information /Evidence:	Visual verification: Database accessible at https://biodiversity.mta.gov.tl/ with ~5,000 records. PIR 2025 Interview
Narrative Assessment:	The project achieved a major milestone by establishing Timor-Leste's first sovereign National Biodiversity Database and ABS Clearing-House Mechanism

	(CHM). It significantly exceeded data targets (~5,000 records vs. 1,000 planned) by repatriating digital data from global collections (GBIF, Portugal, Indonesia). The project is directly <i>attributed</i> with providing the hardware, software, and training that created this capacity from zero. However, the <i>utility</i> of this capacity is threatened by infrastructure fragility (lack of stable internet in the Ministry), turning the database into a static catalogue rather than a dynamic monitoring tool. The "monitoring" aspect (Article 17) is technically possible but operationally constrained. Protocols for Traditional Knowledge were applied, but data is deliberately kept offline to prevent biopiracy, restricting public access but protecting rights.
Level of Achievement:	Fully achieved
Outcome 2.2:	Enhanced technological and business capacity for bio-prospecting in Timor-Leste, in compliance with the Nagoya Protocol on sustainable utilisation of genetic resources.
Performance Indicator(s) and Target(s):	Indicators: 1. Number of staff trained in bio-prospecting/lab management. 2. Number of resources identified for commodity development. Targets: 1. At least 10 staff. 2. At least 3 resources.
Sources of Information /Evidence:	PIR 2025 Interviews Project Review (National Lab equipment not operational by closure)
Narrative Assessment:	The project successfully identified and developed 4 prototype products (exceeding the target of 3), including <i>Aimuro</i> mouthwash and <i>Aruda</i> balm. This demonstrates the potential for "business capacity." The "technological capacity" outcome was severely compromised. The National Biodiversity Laboratory was not operationalised (missing cabling/equipment purchase underway still prior to installation and training) by project end. The project had to resort to <i>unsustainable workarounds</i> like shipping samples to Indonesia or renting mobile labs for training. Therefore, while individuals were trained, the <i>institutional</i> capacity to conduct independent bioprospecting remains fragile and dependent on external support. No commercial contracts (MAT) could be signed due to the lack of a legal framework, limiting the "business" aspect to academic prototypes only.
Level of Achievement:	Partially achieved

73. The project successfully established the complete "soft" infrastructure required for a national ABS regime, effectively closing the regulatory gaps identified at design. Under Outcome 1.1, the technical conditions for adoption were fully met with the finalisation of the legal framework and the designation of the Competent National Authority. However, the transition to full outcome achievement remains suspended by the "missing middle" - the lack of parliamentary ratification - which renders the established Technical Committee legally dormant and unable to process commercial applications. Conversely, Outcome 1.2 achieved broad success in socialising these complex concepts, exceeding participation targets and successfully embedding ABS knowledge into academic curricula at UNTL and UNDIL, thereby creating a reservoir of capacity that may outlast the current political stagnation.
74. Under Outcome 2.1, the project delivered a transformative digital asset by establishing the National Biodiversity Database, effectively "repatriating" data sovereignty through the consolidation of over 5,000 records from international collections. This achievement provides Timor-Leste with its first centralised mechanism for monitoring genetic resources, a critical requirement of the Nagoya Protocol. However, the institutionalisation of this capacity is fragile; the daily utility of the platform is currently

compromised by basic logistical deficits – specifically unreliable internet access within government offices – which threatens to reduce this dynamic monitoring tool to a static repository unless recurring operational budgets are secured.

75. The achievement of Outcome 2.2 presents a dichotomy between successful product demonstration and unfulfilled structural capacity. The project effectively validated the economic potential of genetic resources by developing four bioprospecting prototypes (e.g., Aimuro mouthwash), validating the business case for ABS. Yet, the core objective of enhancing technological capacity was severely undermined by the failure to operationalise the National Biodiversity Laboratory. By resorting to outsourcing chemical analysis to international partners (e.g., BRIN Indonesia) to bypass local infrastructure delays, the project successfully delivered the results of research but could not fully transfer the means of production, leaving national institutions dependent on external technical support for future bioprospecting efforts.

Likelihood of Impact

76. The assessment of impact is derived from the project's Reconstructed Theory of Change (RTOC). The project successfully navigated the first phase of the causal pathway by delivering necessary technical outputs (draft laws, databases, and pilot agreements). However, the transition from Outcomes (capacity and frameworks exist) to Intermediate States (frameworks are *functioning* and generating benefits) is currently blocked. The analysis indicates that while "enabling" outcomes (awareness, database) were achieved, the most important outcomes required to trigger impact - specifically the parliamentary adoption of the legal framework and the operationalisation of the national laboratory - were only partially achieved or stalled. Consequently, the likelihood of achieving the intended long-term impact is rated as Unlikely.

Table 15: Likelihood of impact

Factors influencing likelihood of impact	Assessment	Justification
Drivers to support transition from Outputs to the Project Outcomes	Partially in place	The PMU and technical partners (Conservation International, BRIN) successfully drove technical delivery. However, government co-financing and high-level political champions were inconsistent due to shifting priorities toward ASEAN accession by 2024/5. PMU and technical partners (Conservation International, BRIN) effectively drove technical delivery in the final years. However, government co-financing was also inconsistent, particularly regarding laboratory infrastructure renovation.
Assumptions for the change process from Outputs to Project Outcomes	Partially hold	The assumption that "Sector agencies remain committed" held partially; technical staff were engaged, but high-level commitment fluctuated. The assumption of "stable infrastructure" did not hold, evidenced by the lack of basic internet access in government offices, hampering the utility of digital outputs and difficulties and securing and preparing infrastructure to hold the laboratory.

Proportion of Project Outcomes fully or partially achieved	Some	Technical capacity outcomes (2.1) were largely met (database established), but legal adoption outcomes (1.1) and technological transfer outcomes (2.2) were only partially achieved due to the lack of ratification and unfinished laboratory setup.
Drivers to support transition from Project Outcomes to Intermediate States	Partially in place	There is active interest from academic institutions (UNTL, UNDIL) to use the new knowledge. However, the ABS Technical Committee, a key driver for processing permits, is currently inactive/ad-hoc because no legal commercial applications exist to drive its function.
Assumptions for the change process from the Project Outcomes to Intermediate States	Do not hold	The critical assumption that "Government regulations and policies have been submitted to Parliament for adoption" failed. The "Ratification Package" was lost during administrative handovers and remains pending after resubmission. Without this, the Intermediate State of a "functioning ABS regime" cannot be realised by project's end although this may probably change after project closure.
Proportion of Intermediate States achieved	None	The Intermediate State (Operational ABS Framework regulating access and generating benefits) has not been reached. No commercial Mutually Agreed Terms (MAT) have been signed, and no monetary benefits have flowed to communities yet.
Drivers to support transition from Intermediate States to Impact	Not in place	Private sector interest remains tentative if not absent. Interviews confirm that no pharmaceutical companies are currently interested due to the "lack of legal clarity" and the inability to sign enforceable contracts.
Assumptions for the change process from Intermediate States to Impact	Do not hold	The assumption that "ABS mechanism is sustained and continues to deliver benefits" cannot hold yet because the mechanism has not legally commenced operations.

77. The likelihood of the project achieving its long-term impact - enhanced conservation through fair benefit-sharing - is assessed as Unlikely by project's end. This rating reflects the structural reality that the project's technical successes (draft laws, databases) are necessary but insufficient conditions for impact. The "engine" for ABS has been built, but without the "ignition key" of parliamentary ratification, it cannot operate. University stakeholders confirmed that commercialisation and benefit-sharing are "impossible" without the legal certainty required by private sector partners to sign enforceable contracts.

78. Furthermore, the sustainability of any nascent impact is threatened by infrastructure fragility. The National Biodiversity Database risks becoming a "digital cemetery" due to the lack of stable internet access and recurring hosting budget within the Ministry. Furthermore, civil servant staff still lack internet culture and resort more to manual handling of documents rather than internet communications. Similarly, the "technology transfer" impact is compromised because the National Laboratory remains non-

operational (lacking cabling and installed equipment). Consequently, the country remains dependent on foreign laboratories (e.g., BRIN Indonesia) for analysis, preventing the localisation of economic and scientific benefits.

Findings Statements on Effectiveness:

79. Technical readiness vs. political stagnation: the project was highly effective in generating the technical "soft" infrastructure for ABS (100% of legal drafts, community protocols, and databases completed). However, effectiveness in terms of systemic change was severely limited by the "missing middle" - the failure to secure parliamentary ratification - which has left the regulatory framework technically ready but legally unenforceable.
80. Operational bottlenecks to capacity: while individual capacity was built through training, institutional effectiveness was undermined by chronic infrastructure deficits. The inability to secure basic internet for the database or electricity for the laboratory equipment has prevented the transition from "staff trained" to "institutions functioning," forcing a reliance on external partners that is not sustainable post-project.

Rating for Effectiveness: Satisfactory

Rating for Availability of Outputs: Satisfactory

Rating for Achievement of Project Outcomes: Moderately Satisfactory

Rating for Achievement of Likelihood of Impact: Unlikely

E. Financial Management

Adherence to UNEP's Financial Policies and Procedures

81. The project's adherence to financial standards was characterised by significant struggles, particularly in the first half of implementation. A major bottleneck was the delay in the first disbursement of funds; while the project received CEO Endorsement in August 2018, the first disbursement did not occur until November 2019 (over 15 months later), significantly delaying the start of operations. Throughout implementation, the project faced chronic delays in the submission of financial reports (QERs) and audits. For instance, the audit report covering the fiscal years 2020–2022 was not completed until 2024 due to difficulties in contracting competent auditors, which subsequently delayed the release of the third tranche of GEF funds and slowed down activity implementation.
82. Financial compliance in this project was difficult to achieve due to the difficulties of the project team and the administrative/finance specialist to adhere to UNEP's requirements. Interviews with UNEP HQ and the MTR highlighted an overall lack of fiduciary capacity within the executing agency in Timor-Leste, noting that UNEP Task Managers often had to provide extensive "hand-holding" or even rewrite financial reports to ensure they met standards. Furthermore, procurement processes for the National Laboratory equipment failed; despite a vendor being selected, the contract was terminated in December 2024 due to non-delivery, leaving the funds allocated for this critical output unspent at project closure.

Completeness of Financial Information

83. Despite the delays, the project eventually succeeded in compiling a relatively complete set of financial data by the time of the Terminal Review. Budget revisions were formally approved (e.g., in August 2022 and 2023) to reallocate salary savings and adjust for the No-Cost Extensions. Expenditure reports for the final years are available and signed. However, the co-financing data reveals a stark discrepancy between design and reality; while in-kind contributions from partners like Conservation International were tracked, the pledged cash co-financing from the Government (approx. USD 800,000 from MDIR and MAF) never materialised, possibly due to ministerial restructuring.
84. The project maintained a clear audit trail for the latter years, with the independent audit for the period ending December 31, 2024, issuing a fair opinion on the financial position. However, the "completeness" is marred by the lack of timely co-financing reports during the interim years (2020–2022), where reporting was often missing or consolidated retrospectively. These severe delays in submitting mandatory co-financing and audit reports had direct operational consequences, forcing UNEP to postpone the finalisation of Terms of Reference (TORs) and subsequent recruitments and cash advances until compliance was met.

Table 16: Financial management

Financial management components:		Rating	Evidence/ Comments
1. Adherence to UNEP's/GEF's policies and procedures:		MU	
Any evidence that indicates shortcomings in the project's adherence ²⁴ to UNEP or donor policies, procedures or rules		Yes	Severe delays in audit submissions (2020-2022 audits done in 2024); QERs required extensive revision by UNEP; failure of procurement for lab equipment
Was first disbursement carried out within 9 months of UNEP's project approval date.		Yes/No	CEO Endorsement: 07 Aug 2018. First Disbursement: 27 Nov 2019 (approx. 15 months delay)
Were the procurement policies of UNEP and the donor(s) followed? (where applicable)		Yes/No or N/A	Policies were followed (tenders launched), but the outcome was a failure (vendor non-performance/contract termination) regarding the lab equipment
2. Completeness of project financial information²⁵:			
Provision of key documents to the evaluator (based on the responses to A-H below)		S	<i>Documents are available now, though generated late.</i>
A.	Co-financing and Project Cost's tables at design (by budget lines)	Yes	Provided in ProDoc Appendix 1 & 2 and CEO Endorsement Request.
B.	Revisions to the budget	Yes	Approved revisions for No-Cost Extensions (Aug 2022, 2023) provided
C.	All relevant project legal agreements (e.g. SSFA, PCA, ICA)	Yes	Signed PCA and amendments provided
D.	Proof of fund transfers	Yes	Cash Advance Statements available
E.	Proof of co-financing (cash and in-kind)	Yes	PIRs track this. Note: Government cash co-financing reported as zero/not materialised

²⁴ If the evaluation raises concerns over adherence with policies or standard procedures, a recommendation maybe given to cover the topic in an upcoming audit, or similar financial oversight exercise.

²⁵ See also document 'Criterion Rating Description' for reference.

F.	A summary report on the project's expenditures during the life of the project (by budget lines, project components and/or annual level)	Yes	Cumulative expenditure reports available in PIRs and Final QERs
G.	Copies of any completed audits and management responses	Yes	Audit reports for 2020-2022 (consolidated) and 2024 provided
H.	Procure documents ²⁶ , including the approved requisition document and Source Selection Plan	Yes	Procurement plans included in annual workplans
I.	Any other financial information that was required for this project (list):	N/A	
Overall rating		MU	

Findings Statements on Financial Management:

85. Capacity constraints leading to non-compliance: financial management was consistently hampered by limited fiduciary capacity within the executing agency. The project struggled to meet UNEP's reporting standards without significant external intervention, and the inability to secure competent auditors on time led to cascading delays in fund disbursements, directly affecting the implementation of field activities.
86. Failure of co-financing realisation: there was a critical variance between planned and actual co-financing. While in-kind technical support from partners (Conservation International, NGS) was delivered, the substantial cash co-financing pledged by the Government (MDIR/MAF) and in-kind support from academic partners (UNTL) largely failed to materialise due to political restructuring and shifting priorities, leaving the project heavily reliant on the GEF grant.

Rating for Financial Management: Moderately Unsatisfactory

Rating for Adherence to UNEP's Financial Policies and Procedures: Moderately unsatisfactory

Rating for Completeness of Financial Information: Moderately satisfactory

F. Efficiency

87. The project's efficiency can be described as a "tale of two halves." The first phase (2019–2022) was severely inefficient, rated as "Unsatisfactory" at the Mid-Term Review due to the combined impact of the COVID-19 pandemic and a critical 1.5-year vacancy in project leadership. To compensate for these delays, two no-cost extensions were required, extending the project by a total of 24 months. However, the second phase (2023–2024) saw a significant turnaround. The reconstituted PMU adopted a "compression strategy," running legal drafting and community piloting workstreams in parallel to finalise the core technical outputs within the remaining timeframe.
88. Cost-effectiveness was improved through adaptive management of partnerships. A key strategic move was replacing the original Australian partner (MAGNT) with the Indonesian National Research and Innovation Agency (BRIN). This change leveraged south-south cooperation, utilising regional experts with similar ecological contexts at a lower operational cost than the original plan. Additionally, by contracting Conservation International (CI), the project capitalised on pre-existing relationships in Larisula and Macadade, avoiding the significant time and expense required to build community trust from scratch.
89. Regarding the carbon footprint, the project effectively minimised emissions, largely due to external constraints. Pandemic-related travel restrictions and budget reallocations

²⁶ Relevant for procurement action over USD 10,000 in value.

significantly reduced international flights. Instead of sending large delegations abroad for training as originally planned, the project prioritised in-country training. For example, the decision to rent a local "mobile genomic laboratory" rather than sending staff or samples overseas reduced the travel footprint while ensuring capacity building continued despite the delays in constructing the permanent laboratory.

Type of project extension (cost/no-cost)	Duration (# months)	Reason for no-cost extension
No-Cost Extension 1	18 months	To compensate for delays caused by the COVID-19 pandemic and the 1.5-year vacancy of the National Project Coordinator position.
No-Cost Extension 2	6 months	To accommodate delays caused by national elections and ministerial restructuring, and to finalise the biodiversity database and equipment procurement.

Findings Statements on Efficiency:

90. Strategic partnership change: the project improved both cost-effectiveness and technical relevance by switching from a distant international partner to a regional one (BRIN Indonesia). This "south-south cooperation" approach reduced costs and accelerated delivery by utilising experts who were more familiar with the local ecological and cultural context.
91. Procurement bottlenecks: despite having available funds, the project struggled to efficiently convert budget into "hard" infrastructure. The procurement of laboratory equipment was stalled for years due to a disconnect between technical specifications and administrative procedures, eventually leading to contract termination and the non-delivery of critical equipment by project closure.

Rating for Efficiency: Moderately Satisfactory

G. Monitoring and Reporting

Monitoring of Project Implementation:

92. The monitoring of project implementation followed a distinct trajectory of initial failure followed by a good recovery. The project design included a comprehensive Costed M&E Plan with SMART indicators and clear milestones. However, during the period 2020–2022, monitoring mechanisms were largely non-functional; the Project Steering Committee (PSC) did not convene for over two years (January 2020 to January 2023), leaving the project without strategic oversight during the critical COVID-19 period and the 1.5-year vacancy of the National Project Coordinator. This lack of supervision contributed to the project being rated as "Unsatisfactory" in effectiveness at the Mid-Term Review.
93. In the final half of the project (2023–2024), monitoring was significantly strengthened under the reconstituted PMU. The new team instituted routine bi-weekly coordination meetings and utilised visual management tools to track daily progress against the revised workplan. Adaptive management was effectively employed based on monitoring data; for instance, recognising the "Unsatisfactory" progress in the laboratory renovation and the withdrawal of the original technical partner (MAGNT), the project moved to a south-south cooperation model with BRIN Indonesia and rented a private mobile laboratory to ensure training targets were met despite infrastructure delays.

Project Reporting

94. Project reporting demonstrated a divergence between narrative and financial performance. Narrative reporting through the Project Implementation Reviews (PIRs) was generally timely, accurately capturing the project's turnaround from "Unsatisfactory" ratings in 2022 to "Satisfactory" in 2025. The project successfully adhered to gender reporting requirements, moving from having "no data recorded" in 2021 to reporting specific disaggregated figures by 2023 (e.g., 191 female vs. 183 male direct beneficiaries) and documenting the specific roles of women as custodians of Traditional Knowledge in Larisula and Macadade.
95. Still, financial reporting was a persistent weakness. Quarterly Expenditure Reports (QERs) frequently suffered from quality issues, often requiring the UNEP Task Manager to "rewrite" or significantly correct them due to capacity gaps within the executing agency. Compliance with audit requirements was severely delayed; the audit for the fiscal years 2020–2022 was not finalised until April 2024 due to difficulties in procuring competent auditors. This administrative bottleneck directly delayed the release of the third tranche of GEF funds, creating cash flow constraints that slowed down field activities in the final year.

Findings Statements on Monitoring and Reporting:

96. Effective adaptive management: the project successfully utilised monitoring feedback to rescue delivery in its final phase. When it became evident through monitoring that the "hard" infrastructure (National Laboratory) would not be ready in time, the PMU adapted by shifting resources to "soft" capacity building via mobile laboratories and regional partnerships, ensuring that core training objectives were met despite logistical failures.
97. Financial reporting capacity gap: while the project successfully tracked technical and gender results, it struggled to meet UNEP's financial reporting standards independently. The reliance on external support to finalise QERs and the multi-year delay in submitting audits highlight a systemic lack of fiduciary capacity within the executing agency that persisted throughout the project lifecycle.

Rating for Monitoring and Reporting: Satisfactory

Rating for Monitoring of Project Implementation: Satisfactory

Rating for Project Reporting: Moderately Satisfactory

H. Sustainability

Socio-political Sustainability

98. The socio-political sustainability of the project presents a dichotomy between strong grassroots ownership and fragile high-level political will. At community level, the project successfully generated robust buy-in, in Larisula and Macadade, where local leaders and *Lia Nain* (traditional custodians) actively participated in developing Community Protocols and shared Traditional Knowledge (TK) for the first time. This bottom-up demand provides a solid social foundation. However, at national political level, sustainability is compromised by shifting government priorities. Stakeholders report that the momentum for ratifying the Nagoya Protocol has been overshadowed by the government's primary focus on ASEAN accession. The temporarily (?) "lost dossier" incident, where the physical ratification package was misplaced during a ministerial handover, underscores a lack of administrative continuity and institutional memory that threatens to stall the legal framework indefinitely.

99. Furthermore, the sustainability of community engagement relies on the realisation of benefits, which is currently legally impossible. University partners noted that while communities are "open-minded," they expect tangible returns. Without the ratified ABS Law to enforce benefit-sharing agreements with private entities, there is a risk of disillusionment or "biopiracy" fears resurfacing. To mitigate this, the project adopted a "defensive" protection strategy by keeping TK inventories in offline booklets rather than public databases, ensuring that community rights are protected even if the political process stalls.

Financial Sustainability

100. The financial sustainability is currently assessed as the project's weakest area. The vision of a self-sustaining ABS regime funded by commercial benefit-sharing revenues has not materialised because no commercial access contracts (MAT) could be signed in the absence of the law. Consequently, the key institutions created - the Competent National Authority (CNA) and the ABS Technical Committee - remain entirely dependent on state budget allocations, which are historically erratic for environmental portfolios.
101. Specific risks loom over the project's technological assets: the Technical Lead explicitly highlighted the risk of the National Biodiversity Database becoming unused despite being a technically sound platform that risks going offline due to the lack of a specific recurrent government budget line for web hosting, domain renewal, and server maintenance. Similarly, the failure to procure the laboratory equipment creates a future financial burden; if the government eventually equips the lab, it will face immediate unbudgeted costs for expensive consumables (reagents, gases) required to run the advanced analysis (LCMS) that the project originally intended to support.

Institutional Sustainability

102. Institutional sustainability is supported by the formal establishment of the ABS Technical Committee and the designation of the National Directorate of Biodiversity as the CNA via ministerial decree. This creates a permanent governance structure that survives the project's closure. Additionally, the project's strategy of embedding bioprospecting capacity within local universities (UNDIL, UNPAZ, ICS) through MOUs and sub-grants has created a decentralised reservoir of technical expertise that is less susceptible to government staff turnover.
103. However, the "hard" institutional capacity remains fragile. The National Biodiversity Laboratory, intended to be the technical heart of the monitoring regime, remains non-operational. The reliance on external partners like BRIN (Indonesia) for chemical analysis and Conservation International for community engagement during the project highlights a gap in domestic institutional autonomy. Without the operational laboratory and the ratified legal power to enforce permits, the national institutions have the *mandate* to manage ABS but lack the *mechanisms* to do so effectively independent of donor support.

Findings Statements on Sustainability:

104. "Digital Cemetery" risk: while the National Biodiversity Database and ABS Clearing-House are technically fully operational, their long-term survival is threatened by the absence of a secured, recurrent government budget for basic IT maintenance (hosting/domains), risking the loss of these assets once project support ends.
105. Legal vacuum threats: the socio-political sustainability of the ABS regime is contingent upon the ratification of the Nagoya Protocol. Without this legal framework, the "soft" institutions (Technical Committee) lack enforcement power, and community

expectations for benefit-sharing cannot be legally fulfilled, creating a risk of stakeholder disengagement.

106. Partnership-based resilience: the project successfully diversified institutional sustainability by anchoring technical capacity within academia (universities) and regional networks (BRIN Indonesia), reducing reliance on the fluctuating capacity of the central government's environmental agencies.

Rating for Likelihood of Sustainability: Unlikely

Rating for Socio-political Sustainability: Moderately Likely

Rating for Financial Sustainability: Unlikely

Rating for Institutional Sustainability: Moderately Unlikely

I. Factors Affecting Performance and Cross-Cutting Issues

Quality of Project Management and Supervision

107. Project management by the Executing Agency (MDIR/SSE) was characterised by extreme volatility. Implementation was severely hampered between 2020 and 2022 by a critical 1.5-year vacancy in the National Project Coordinator position, during which the Project Steering Committee (PSC) failed to meet, leaving the project without operational leadership or strategic oversight. However, the appointment of a new PMU in late 2022 marked a turning point. The new team successfully "compressed" the remaining activities, instituting routine coordination meetings and visual management tools to rescue delivery, although they remained understaffed and stretched thin by having to cover both technical and administrative roles.
108. The supervision by UNEP as the Implementing Agency was generally effective but constrained by its status as a non-resident agency in Timor-Leste. While the Task Managers provided extensive remote support - often stepping in to correct financial reports due to local capacity gaps – interviews showed a general feeling that the lack of a physical country presence limited UNEP's ability to engage directly with high-level political counterparts. Conversely, from UNEP's perspective, this non-resident arrangement also provided the project with access to permanent, specialised Task Managers who brought extensive cross-country portfolio experience and lessons learned from other ABS projects, balancing the local advocacy gap with broad technical oversight and capacity building. Despite these challenges, UNEP's flexibility in approving budget revisions and adaptive management strategies (e.g., shifting from international to regional partners) was cited by the PMU as a critical factor in the project's late-stage recovery.

Stakeholders Participation and Cooperation

109. Stakeholder participation followed a U-shaped trajectory: strong enthusiasm at design, a collapse in engagement during the "stagnation years" (2020–2022), and a robust reactivation in the final phase. The project successfully re-engaged key partners by formalising roles: Conservation International (CI) was contracted to lead community engagement in Larisula and Macadade, effectively leveraging their pre-existing trust relationships to secure Prior Informed Consent (PIC). Similarly, the partnership with NGS (Japan) and BRIN (Indonesia) was key for technical delivery, providing the expertise for bioprospecting training which national institutions lacked.
110. Engagement with academia was very strong, with Memorandums of Understanding (MoUs) signed with UNTL, UNDIL, and UNPAZ to embed ABS research into curricula. However, inter-ministerial cooperation remained a challenge; while technical staff from the Ministry of Agriculture and Fisheries (MAF) and Ministry of Health (MoH)

participated in training, high-level strategic alignment was often disrupted by frequent government restructuring and the replacement of Directors General, requiring the PMU to repeatedly "re-brief" new officials.

Responsiveness to Human Rights and Gender Equality

111. The project demonstrated a satisfactory responsiveness to gender equality, achieving a Gender Marker score of 2A (Gender well mainstreamed). Although no standalone "Gender Action Plan" was created at design, the project consistently tracked disaggregated data, reporting 48% female participation in key training events by 2023. In the pilot communities, specific focus group discussions were held with women to document their unique role as custodians of Traditional Knowledge (TK) related to medicinal plants and weaving, ensuring their specific intellectual property rights were captured in the Community Protocols.
112. Regarding human rights, the project fundamentally operationalised the right to Free, Prior and Informed Consent (FPIC). By developing and testing the first-ever protocols in Timor-Leste, the project established a legal precedent that empowers indigenous communities to grant or withhold access to their genetic resources, directly addressing the risk of biopiracy and ensuring that communities are treated as rights-holders rather than passive beneficiaries.

Environmental and Social Safeguards

113. The project was classified as Low Risk at design, and implementation adhered strictly to environmental safeguards. The collection of biological samples (bioprospecting) was conducted under strict protocols developed with BRIN and CI to ensure no ecological damage occurred; sample sizes were kept minimal, and collections were restricted to non-threatened species.
114. Social safeguards were managed through the FPIC process. The project mitigated the risk of "raising false expectations" regarding commercial benefits by clearly communicating the long timelines of bioprospecting to communities. Furthermore, to protect sensitive Traditional Knowledge from misappropriation, the project adopted a "defensive protection" strategy: TK inventories were returned to communities in the form of physical booklets/archives rather than being published on the open-access National Database, ensuring communities retain control over their intellectual property in the absence of a finalised national law.

Country Ownership and Driven-ness

115. Country ownership presented a paradox of high technical ownership versus low political ownership. At the technical level, the National Directorate of Biodiversity and local universities demonstrated strong ownership, actively co-leading field surveys and populating the database. The designation of the Competent National Authority (CNA) and the establishment of the ABS Technical Committee provide structural evidence of institutionalisation.
116. However, political ownership at the highest level was insufficient to drive the necessary legislative changes. The "Ratification Package" for the Nagoya Protocol stalled in the Council of Ministers due to shifting priorities toward ASEAN accession and the loss of physical dossiers during administrative handovers. Furthermore, the failure of the government to realise its cash co-financing commitment for the laboratory reconstruction (USD ~800,000 pledged vs. negligible actual) severely undermined the project's "hard" capacity goals, forcing reliance on donor funds for basic infrastructure.

Communication and Public Awareness

117. The project executed an appropriate communication strategy, moving beyond standard technical reports to engage the broader public. Materials were produced in Tetum and Portuguese to ensure accessibility. Key initiatives included a drawing competition for schools to engage youth, regular talk shows on national television to reach the general public, and the distribution of brochures during university seminars.
118. Awareness among targeted stakeholders increased significantly, from a baseline of near-zero to over 73 verified high-level stakeholders by project end. At the start of the project, the "Seeing is Believing" study tour to the Sarawak Biodiversity Centre (Malaysia) for senior government officials was highlighted as a particularly effective communication tool that successfully demonstrated the economic potential of ABS, even if this awareness did not immediately translate into parliamentary ratification.

Findings Statements on Factors Affecting Performance and Cross-Cutting Issues:

119. Resilience through adaptive management: the project's recovery from a "Moderately Unsatisfactory" mid-term status to a "Satisfactory" technical completion was driven by a highly adaptive PMU that successfully pivoted partnerships (from Australia to Indonesia) and working methods (parallel processing) to overcome severe initial delays.
120. The "Missing Middle" of political ownership: while technical ownership was strong, the lack of sustained high-level political championship - evidenced by the stalled ratification and failed co-financing for the laboratory - remains the primary bottleneck preventing the project from achieving its full development impact.
121. Effective safeguarding via FPIC: the project set a national benchmark for social safeguards by operationalising Free, Prior and Informed Consent (FPIC) through Community Protocols, effectively transforming abstract legal concepts into practical tools for protecting indigenous rights.
122. Capacity constraints in execution: systemic weaknesses in the Executing Agency's fiduciary capacity (procurement failures, audit delays) acted as a persistent drag on performance, highlighting the need for more embedded operational support in future National Implementation Modality (NIM) projects.

Rating for Factors Affecting Performance and Cross-Cutting Issues: Moderately Satisfactory

Rating for Quality of Project Management and Supervision: Moderately satisfactory

Rating for Stakeholders Participation and Cooperation: Satisfactory

Rating for Responsiveness to Human Rights and Gender Equality: Satisfactory

Rating for Environmental and Social Safeguards: Satisfactory

Rating for Country Ownership and Driven-ness: Moderately unsatisfactory

Rating for Communication and Public Awareness: Satisfactory

V. CONCLUSIONS AND RECOMMENDATIONS

A. Conclusions

123. Overall, the project performed at a **Moderately Satisfactory** level. This rating reflects a complex duality in performance: the project was highly successful in delivering the technical and "soft" foundations for Access and Benefit-Sharing (ABS), yet it faced significant challenges in securing the political and "hard" institutional conditions required for long-term impact. The strongest performing aspects were its Strategic Relevance, rated as Highly Satisfactory, and its Effectiveness in output delivery during the final phase. The project succeeded in creating a sector that did not previously exist in Timor-Leste, establishing a complete legal framework, a sovereign biodiversity database, and a cadre of trained experts from a near-zero baseline. Comparative weaknesses were apparent in Sustainability and Financial Management. Specifically, the project struggled to transition from "technical readiness" to "political adoption." The failure to secure parliamentary ratification for the Nagoya Protocol and the inability to fully operationalise the National Laboratory by project closure constitute critical bottlenecks. These structural gaps currently prevent the project from converting its high-quality outputs into the intended development impacts.
124. The main achievements of the project were substantial and foundational. First, it delivered the National Biodiversity Database, a sovereign digital asset that effectively "repatriated" over 5,000 biological records previously held in international collections, thereby restoring data sovereignty to Timor-Leste. Second, the project finalised the complete "Ratification Package" that comprises the Draft Law on Biodiversity, the Decree-Law on ABS, and operational guidelines. These were legally vetted and submitted to the Council of Ministers. Third, the project moved beyond theory to practice by developing four bioprospecting prototypes (including *Aimuro* mouthwash and bio-fertilisers), providing the first tangible "proof of concept" that Timor-Leste's genetic resources hold economic value. Finally, the project established the first Bio-Community Protocols in the pilot sites of Larisula and Macadade, operationalising the principle of Free, Prior and Informed Consent (FPIC) and empowering local communities to negotiate access to their resources.
125. These achievements were brought about largely by the decisive adaptive management exercised by the reconstituted PMU during the second half of the implementation period (2023–2024). Facing a project that was rated "Unsatisfactory" at mid-term due to severe delays caused by the COVID-19 pandemic and a 1.5-year leadership vacuum, the new PMU implemented a "compression strategy," running legal, technical, and community workstreams in parallel to recover lost time. Crucially, the project's recovery was driven by a strategic pivot to south-south cooperation. When original partnerships with Australian institutions became unfeasible, the project successfully engaged the National Research and Innovation Agency of Indonesia (BRIN). This shift not only resolved technical bottlenecks but also improved capacity uptake, as the regional experts shared similar ecological contexts and cultural understandings with the Timorese counterparts.
126. The project demonstrated an innovative approach through its "defensive protection" strategy for Traditional Knowledge (TK). Recognising the high risk of "biopiracy" in a context where the national ABS law remained unratified, the project/Government made the decision *not* to upload sensitive community knowledge to the open-access National Database. Instead, it archived this data in offline community booklets returned directly to the knowledge holders. This approach innovatively balanced the donor's requirement for data digitisation with the ethical imperative to protect indigenous intellectual

property rights in a legal vacuum, thereby setting a kind of benchmark for ethical bioprospecting in fragile states.

127. The sustainability of the project is rated at a Moderately Unlikely level. The main features that support the sustainability of the benefits are the integration of ABS curricula into national universities (ICS, UNPAZ, UNDIL), which ensures a continuous pipeline of capacitated graduates, and the legal establishment of the ABS Technical Committee. However, these "soft" sustainability factors are heavily outweighed by critical financial and institutional risks. Financial Sustainability is rated as Unlikely because the project closed without securing a recurrent state budget line for the maintenance of the National Biodiversity Database or the operation of the laboratory. Without these funds, the digital infrastructure risks becoming unusable, and the technical equipment risks obsolescence. Furthermore, the Socio-political Sustainability is compromised by the "missing middle" - the lack of parliamentary ratification - which leaves the entire ABS regime legally unenforceable and dependent on voluntary compliance.
128. The following unintended negative effects were identified: the delay in ratification, combined with successful high-level advocacy, has created a potential "capability trap." The project successfully raised expectations among communities and researchers that benefit-sharing was imminent. However, the legal blockage means that while technical staff are trained and communities are ready to sign contracts, they are legally prohibited from doing so. This discrepancy between raised expectations and the inability to act risks generating frustration and disillusionment among stakeholders. Basically, most, if not all, the project's achievements are on hold pending ratification. The project's contribution to south-south cooperation was Highly Satisfactory, effectively replacing a North-South aid model with a regional partnership (Timor-Leste and Indonesia) that proved more cost-effective and culturally appropriate. Its contribution to Gender Equality was Satisfactory; the project met its targets with approximately 48% female participation in training and went beyond headcount statistics to explicitly document the distinct role of women as custodians of medicinal plant knowledge in the Community Protocols. Regarding Capacity Building, the project was successful at the individual level (training over 50 staff) but less effective at the systemic level due to the infrastructure issues (unfinished laboratory infrastructure rehabilitation and equipment not delivered).
129. The project achievements contribute to the Global Environmental Governance body of work by moving Timor-Leste from the status of a passive signatory to the CBD to a technically capable actor ready for Nagoya Protocol accession. It has effectively closed the technical compliance gap for one of the region's newest nations, providing a replicable model for how small island developing states can establish sovereignty over their genetic resources despite severe resource constraints.

The review ToR included a set of strategic questions of interest to UNEP:

130. Strategic Question 1: "To what extent did the project succeed in establishing the regulatory, institutional and operational conditions necessary for Timor-Leste to implement the Nagoya Protocol?" The project succeeded in establishing 100% of the *technical* and *operational* conditions but failed to secure the final *political* condition of adoption. The project delivered a comprehensive, legally vetted "Ratification Package," established the Competent National Authority (CNA) via ministerial decree, and operationalised the ABS Technical Committee. However, the "missing middle" - the failure of the Council of Ministers and Parliament to formally ratify the Nagoya Protocol and the domestic ABS Decree-Law - renders this entire framework legally dormant. While the "engine" for ABS governance has been built and assembled, it lacks the

"ignition key" to operate legally. Consequently, the country remains unable to issue internationally recognised permits or enforce benefit-sharing agreements.

131. Regarding Strategic Question 2: "How effectively did the project strengthen national scientific, technical and administrative capacities for ABS implementation, including monitoring, research partnerships and bioprospecting?" Effectiveness was mixed, characterised on the one hand with a strong "soft" capacity and on the other, a failed "hard" capacity. The project was highly effective in strengthening *informational* capacity through the National Biodiversity Database and *individual* capacity through the training of over 50 staff and the development of bioprospecting prototypes. The partnerships with universities (UNDIL, UNTL) effectively embedded scientific knowledge locally. However, the project was ineffective in strengthening *structural* capacity for bioprospecting due to the failure to operationalise the National Laboratory. The inability to complete the laboratory renovation or install critical equipment by project closure means that Timor-Leste remains dependent on external partners (like laboratories in Indonesia) for chemical analysis, limiting its sovereignty and ability to independently monitor genetic resources.
132. Regarding Strategic Question 3: "How well did the project support pathways for long-term sustainability, including national ownership, financial and institutional viability, and integration into national policy processes?" Support for sustainability was fragile and uneven. The project successfully built "soft" ownership among technical staff and academic institutions, creating a viable institutional home for ABS knowledge. However, financial viability is critically weak. The project did not secure a recurrent state budget for the maintenance of the digital assets (database hosting) or laboratory consumables, creating a high risk of service disruption immediately post-project. While integration into policy processes was achieved technically (through the drafting of laws aligned with the Biodiversity Decree Law), it stalled politically. The "Ratification Package" was lost during administrative handovers, highlighting a lack of high-level political ownership that leaves the ABS regime vulnerable to shifting government priorities.
133. Regarding Strategic Question 4: "What factors (contextual, institutional, operational) most influenced project performance—positively or negatively—and what lessons emerge for future ABS initiatives?" Negatively, political instability and infrastructure deficits were the primary drags on performance. Frequent ministerial restructuring led to the loss of key champions and the physical loss of ratification documents, while the lack of basic internet and electricity in government offices hampered the utility of digital outputs. Positively, adaptive management by the PMU and the strategic pivot to south-south cooperation were the critical factors that rescued the project from failure. The decision to switch technical partners from Australia to Indonesia allowed the project to bypass capacity bottlenecks and deliver results in a culturally compatible manner. A key lesson is that future ABS initiatives in similar contexts must decouple technical delivery from political processes to prevent "capability traps," and should prioritise "low-tech," resilient infrastructure solutions over high-tech dependencies.
134. The table below provides a summary of the ratings and findings discussed in Chapter IV. Overall, the project demonstrates a rating of 'Moderately Satisfactory'.

UNEP Evaluation Office Validation of Performance Ratings:

The UNEP Evaluation Office formally quality assesses (see Annex XIII) management led Terminal Review reports and validates the performance ratings therein by ensuring that the performance judgments made are consistent with evidence presented in the Review report and in-line with the performance standards set out for independent evaluations.

The Evaluation Office assesses a Terminal Review report in the same way as it assesses the initial draft of a Terminal Evaluation report. It applies the following assumptions in its validation process:

- That what is being assessed is the contents of the report and the extent to which it makes a consistent and justifiable case for the performance ratings it records.
- That the consultant has, within the report, presented all the evidence that was made available to them.
- That the Review has been based on a robust Theory of Change, reconstructed where necessary, which reflects UNEP's definitions at all levels of results.
- That the project team and key stakeholders have already reviewed a draft version of the report and provided substantive comments and made factual corrections to the Review Consultant, who has responded to them. The Evaluation Office assumes, therefore, that it has received the Final (revised) version of the report.

In this instance the Evaluation Office validates the overall project performance rating at the '**Moderately Unsatisfactory**' level.

Below is the summary of project findings and ratings²⁷

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Strategic Relevance		Highly Satisfactory	Rating validated	HS
1. Alignment to UNEP MTS, POW and strategic priorities	The project aligns fully with UNEP's Medium-Term Strategy (2018–2021/2022–2025) under the Environmental Governance and Nature Action sub-programmes by strengthening legal frameworks for the Nagoya Protocol. It directly supports the Bali Strategic Plan through extensive capacity building for government staff and technology transfer (database/laboratory equipment). Furthermore, it exemplifies south-south cooperation by leveraging regional expertise from Indonesia (BRIN) and to a lesser extent Malaysia to deliver technical results.	Highly Satisfactory	Rating validated	HS
2. Alignment to Donor/Partner strategic priorities	The project is fully consistent with the GEF-6 Biodiversity Focal Area, specifically Program 8, targeting the implementation of the Nagoya Protocol. It directly supports the Government of Timor-Leste's National Biodiversity Strategy and Action Plan (NBSAP), particularly Strategic Action 16, and operationalises the Biodiversity Decree Law (No. 6/2020) by developing the specific regulations and technical mechanisms required to make the national ABS regime enforceable.	Highly Satisfactory	Rating validated	HS
3. Relevance to global, regional, sub-regional and national environmental priorities	The project is highly relevant to global priorities, directly contributing to SDG 15.6 and Aichi Target 16 by establishing the mandatory legal framework for benefit-sharing. Nationally, it addresses critical gaps in the Strategic Development Plan by creating a mechanism for valuing genetic resources. Regionally, it fosters coherence within the Community of Portuguese Language Countries (CPLP) by developing legal drafts compatible with the Lusophone civil law system of the country.	Highly Satisfactory	Rating validated	HS

²⁷ Most criteria will be rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability and Likelihood of Impact are rated, also on a six-point scale, from Highly Likely (HL) down to Highly Unlikely (HU) and Nature of External Context is rated from Highly Favourable (HF) to Highly Unfavourable (HU).

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
4. Complementarity with relevant existing interventions/coherence	The project demonstrated mixed complementarity. While planned synergies with the EU "Ai Ba Futuru" project were missed by timeline misalignments, coordination with the UNDP-GEF CCCD project successfully integrated the ABS database into the national environmental portal. The project also created adaptive partnerships with Conservation International and BRIN (Indonesia) during implementation to fill technical gaps left by original partners, ensuring operational coherence despite initial setbacks	Highly Satisfactory	This sub-criterion is rated as 'Satisfactory' in the narrative section of the report. Rating validated at the 'Satisfactory' level.	S
Quality of Project Design	The design was technically coherent and strategically sound, correctly identifying key legislative and capacity gaps. However, it suffered from "optimism bias" regarding the time required for parliamentary legislative processes and complex procurement. While stakeholder analysis was adequate, the design underestimated critical infrastructure risks - such as the lack of stable internet and electricity - and lacked a sufficiently robust gender analysis or specific gender-responsive indicators.	Moderately Satisfactory	Rating validated	MS

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Nature of External Context	Implementation was severely hampered by an unfavourable operating environment. The COVID-19 pandemic caused extensive delays and travel restrictions during the first half. Furthermore, the project faced chronic political instability, with frequent ministerial restructuring disrupting leadership continuity. Persistent infrastructure deficits, including the lack of basic internet access in government offices and unstable electricity for the laboratory, critically undermined the utility of digital and technical outputs.	Unfavourable	As indicated in the 05 TR Criteria Ratings Description Matrix 05.06.25.docx, in order for the 'Nature of External Context' to be rated 'Unfavourable', more than one of the following conditions had to be present: • <i>Climatic events (hurricanes, droughts floods etc.) disturbed project operations for a prolonged period to a significant extent.</i> • <i>Security situation temporarily affected project staff and partners operations to a significant extent,</i> • <i>Economic conditions intermittently but significantly hampered project operations in project locations (e.g. currency trading restrictions)</i> • <i>Political context significantly hampered project operations in project locations for a prolonged period (e.g. national elections)</i> The project implementation was affected primarily by COVID-19 and political instability. However, as noted in the 'Criteria Ratings Description Matrix', it is important to note that potential delays or changes in political support that are often associated with the regular national election cycle should be part of the project's design and addressed through adaptive management of the project team. Therefore, the conditions present during project implementation justify a rating of 'Moderately Unfavourable'.	MU

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
Effectiveness		Satisfactory	The Evaluation Office notes that the aggregated rating of 'Effectiveness' as a result of the ratings provided by the Reviewer to the three sub-criteria is 'Moderately Satisfactory' (see 06 TR Criteria Weighted Ratings Table 05.06.25.xlsx) Rating validated at the 'Moderately Satisfactory' level.	MS
1. Availability of outputs	The project achieved a dichotomy in delivery. It successfully produced 100% of the required "soft" technical assets, including a complete legal "Ratification Package," a sovereign National Biodiversity Database, and community protocols. However, the delivery of "hard" infrastructure was unsatisfactory; the National Laboratory remained unequipped at closure. Crucially, while the legal framework was developed, it was not formally adopted by Parliament	Satisfactory	Rating validated	S
2. Achievement of project outcomes	Outcome achievement was mixed. Individual and informational capacities were significantly strengthened, evidenced by the operational National Biodiversity Database and the integration of ABS curricula into universities. However, systemic capacity remains constrained. The legal framework (Outcome 1.1) is technically ready but legally dormant without ratification, and the bioprospecting capacity (Outcome 2.2) lacks the necessary laboratory infrastructure to function independently of foreign support	Moderately Satisfactory	Rating validated	MS
3. Likelihood of impact	The causal pathway is blocked at the transition to Intermediate States because the legal framework remains unratified. Without this "ignition key," no commercial benefit-sharing agreements can be enforced. Furthermore, the sustainability of technical impacts is threatened by the lack of secured government budgets for maintaining the database and laboratory	Unlikely	Rating validated	U
Financial Management		Moderately Unsatisfactory	Rating validated	MU

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
1. Adherence to UNEP's financial policies and procedures	Adherence was weak due to systemic capacity gaps. The project experienced a 15-month delay in the first disbursement and severe delays in audit submissions; the 2020–2022 audits were only finalised in 2024. Quarterly Expenditure Reports (QERs) frequently required extensive revision by UNEP Task Managers to meet standards. Furthermore, critical procurement for the National Laboratory failed due to vendor non-performance	Moderately Unsatisfactory	Rating validated	MU
2. Completeness of project financial information	The project eventually compiled a complete audit trail for GEF funds, with signed expenditure reports available for the final years. However, completeness is compromised by the lack of timely reporting during the 2020–2022 stagnation period. There is also a significant gap in co-financing data; pledged government cash contributions (approx. USD 800,000) were never materialised or officially tracked due to institutional restructuring	Moderately Satisfactory	Rating validated	MS
3. Communication between finance and project management staff	Communication channels improved significantly in the final phase. While early implementation suffered from leadership vacancies and "siloe" operations, the reconstituted PMU established routine coordination meetings to align technical activities with budget availability. However, the technical complexity of financial reporting often exceeded local administrative capacity, necessitating frequent, intensive "hand-holding" and intervention from UNEP oversight staff to ensure clarity	Moderately Satisfactory	The Evaluation Office clarifies that this is no longer a sub-criterion under Financial Management. Please refer to the latest Review Criteria Ratings Matrix (June 2025) . This sub-criterion was not assessed in the narrative section of the report.	N/A
Efficiency	Efficiency was characterised by a "tale of two halves." The first phase was unsatisfactory due to a 1.5-year leadership vacancy and pandemic delays, requiring no-cost extensions. However, the final 18 months demonstrated high efficiency under a new PMU that utilised a "compression strategy." The strategic pivot to south-south cooperation with Indonesia, replacing distant international partners, significantly improved cost-effectiveness and technical delivery rates in the final phase.	Moderately Satisfactory	Rating adjusted to 'Moderately Unsatisfactory' since the project had two no-cost extensions which extended the project implementation by two years.	MU
Monitoring and Reporting		Satisfactory	Rating validated	S

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
1. Monitoring design and budgeting	The project design included a comprehensive, fully costed M&E plan (\$92,000) featuring SMART indicators and clear milestones, which was rated Highly Satisfactory at mid-term. This framework provided a solid basis for tracking, although baselines for some capacity indicators were initially incomplete. The plan was effectively reviewed and updated by the new PMU in 2022 to align with operational realities.	Satisfactory	The Evaluation Office clarifies that this is no longer a sub-criterion under Monitoring and Reporting. Please refer to the latest Review Criteria Ratings Matrix (June 2025) . This sub-criterion was not assessed in the narrative section of the report.	N/A
2. Monitoring of project implementation	Monitoring followed a "U-shaped" trajectory. It initially failed, with the Project Steering Committee inactive for over two years (2020–2022), leaving the project without oversight during critical delays. However, performance recovered strongly in the final phase; the reconstituted PMU instituted bi-weekly coordination meetings and effectively used monitoring data to adaptively shift resources from failed infrastructure to successful regional capacity building	Satisfactory	Rating validated	S
3. Project reporting	Reporting performance was mixed. Narrative reporting via PIRs was timely and high-quality, successfully capturing the project's turnaround and adhering to gender disaggregation requirements (e.g., specific beneficiary counts) but it also required support from UNEP. Conversely, financial reporting was a persistent weakness; the project struggled with compliance, resulting in severe delays for the 2020–2022 audits and requiring intensive external support to finalise Quarterly Expenditure Reports	Moderately Satisfactory	Rating validated	MS
Sustainability		Unlikely	Rating validated	U
1. Socio-political sustainability	At the community level, ownership is strong, driven by the successful piloting of Bio-Community Protocols in Larisula and Macadade. However, high-level political will has stagnated; the "Ratification Package" remains unadopted as government priorities shifted to ASEAN accession in 2025. Without legal enforcement, there is a significant risk of stakeholder disillusionment regarding the promised benefit-sharing	Moderately Likely	Rating validated	ML
2. Financial sustainability	The project closed without securing a recurrent state budget for essential post-project costs, specifically web hosting for the National Database and consumables for the laboratory. Furthermore, the failure of the government to materialise its pledged cash co-financing (USD 800,000) and the inability to generate commercial ABS revenues due to the legal vacuum leave the regime fiscally vulnerable	Unlikely	Rating validated	U

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
3. Institutional sustainability	While the formal designation of the Competent National Authority and the integration of ABS curricula into universities provide a "soft" anchor, "hard" capacity is critically weak. The National Laboratory remains non-operational due to procurement failures, forcing a dependency on foreign partners for analysis. Additionally, the ABS Technical Committee remains legally dormant without the ratification of the Decree Law	Moderately Unlikely	Rating validated	MU
Factors Affecting Performance		Moderately Satisfactory	The Evaluation Office notes that the aggregated rating of 'Factors Affecting Performance' as a result of the ratings given by the Reviewer to the six sub-criteria is 'Satisfactory'. See 06 TR Criteria Weighted Ratings Table 05.06.25.xlsx Rating validated at the 'Satisfactory' level.	S
1. Preparation and readiness	Although a pre-inception workshop was held in 2020, actual mobilisation suffered a significant 10-month delay. The project design underestimated critical risks regarding procurement complexity and laboratory infrastructure, leaving the team ill-prepared for logistical realities. Furthermore, the initial lack of a full-time National Project Coordinator created an operational vacuum that exacerbated the impact of the COVID-19 pandemic	Moderately Unsatisfactory	The Evaluation Office clarifies that this is no longer a sub-criterion under 'Factors Affecting Performance'. Please refer to the latest Review Criteria Ratings Matrix (June 2025) . This sub-criterion was not assessed in the narrative section of the report.	N/A
2. Quality of project management and supervision		Moderately Satisfactory	Based on the two ratings presented and validated below, the aggregated rating of this factor affecting performance is 'Satisfactory'	S
2.1 UNEP/Implementing Agency:	While the lack of a resident country presence limited high-level political advocacy to unblock legislative delays, Task Managers provided vital operational support. They effectively guided adaptive management, such as the pivot to south-south cooperation, and frequently intervened to correct financial reporting errors caused by local capacity gaps, ensuring compliance and project recovery	Satisfactory	Rating validated	S
2.2 Partners/Executing Agency:	Implementation was severely hampered by leadership gaps and the failure to convene the Steering Committee for over two years. Although the new PMU achieved a remarkable turnaround in technical delivery during 2023–2024, systemic weaknesses in fiduciary capacity - specifically regarding audit submissions and laboratory procurement - remained persistent bottlenecks throughout the project	Moderately Satisfactory	Rating validated	MS

Criterion	Summary assessment	Rating	Justification for any ratings' changes due to validation (to be completed by the UNEP Evaluation Office – EOU)	EOU Validated Rating
3. Stakeholders' participation and cooperation	Engagement followed a "U-shaped" trajectory as for monitoring: collapsing during the project's middle years but recovering strongly in the final phase. The PMU successfully formalised roles to re-engage partners; Conservation International leveraged existing community trust for FPIC, while a new consortium of local universities and BRIN (Indonesia) filled technical gaps left by the withdrawal of original partners	Satisfactory	Rating validated	S
4. Responsiveness to human rights and gender equality	The project consistently tracked participation (48% female) and, more importantly, operationalised human rights through Free, Prior and Informed Consent (FPIC). By developing "defensive" Community Protocols, the project empowered women - often the custodians of medicinal knowledge - to protect their intellectual property against biopiracy risks in the absence of a ratified law	Satisfactory	Rating validated	S
5. Environmental and social safeguards	The project adhered to environmental protocols, limiting biological sampling to minimal numbers to prevent ecological harm. Social safeguards were managed through FPIC processes that mitigated "false expectations" of commercial benefits. Sensitive Traditional Knowledge was archived in offline booklets rather than open databases to prevent misappropriation	Satisfactory	Rating validated	S
6. Country ownership and driven-ness	While technical ownership among the PMU and academic partners is strong, high-level political ownership was fragile. The "Ratification Package" stalled due to shifting government priorities toward ASEAN accession in 2025 and administrative turnover, exemplified by the "lost dossier" incident. Consequently, the lack of political championship prevented the allocation of state budgets required for long-term sustainability	Moderately Unlikely	Rating validated as 'Moderately Unsatisfactory' and not 'Moderately Unlikely'.	MU
7. Communication and public awareness	The project exceeded awareness targets, effectively using diverse channels ranging from high-level policy seminars to social media and community booklets in Tetum. It successfully revived the "Biodiversity Working Group" as a platform for dialogue. By embedding ABS concepts into university curricula, the project ensured a lasting legacy of awareness among future decision-makers and researchers	Satisfactory	Rating validated	S
Overall Project Performance Rating		Moderately Satisfactory	Overall project performance rating validated as 'Moderately Unsatisfactory'.	MU

Table 17: Summary of project findings and ratings²⁸

²⁸ Most criteria will be rated on a six-point scale as follows: Highly Satisfactory (HS); Satisfactory (S); Moderately Satisfactory (MS); Moderately Unsatisfactory (MU); Unsatisfactory (U); Highly Unsatisfactory (HU). Sustainability and Likelihood of Impact are rated, also on a six-point scale, from Highly Likely (HL) down to Highly Unlikely (HU) and Nature of External Context is rated from Highly Favourable (HF) to Highly Unfavourable (HU).

B. Lessons learned

Lesson Learned #1:	Dedicated technical expertise embedded within the Project Management Unit (PMU) is a critical prerequisite for specialised biodiversity projects, as administrative coordination alone is insufficient to drive scientific delivery
Context/comment:	The project stagnated for 1.5 years due to a leadership vacuum and reliance on part-time government focal points. The eventual turnaround was driven by a dedicated Technical Specialist who could bridge the gap between scientific requirements and administrative processes
Cross-reference(s) to relevant paragraphs	87, 107

Lesson Learned #2:	Project planning in digitally-transitioning environments must buffer for "analogue latency," as the persistent reliance on manual documentation and physical signatures dictates a slower operational pace than digital-first designs assume
Context/comment:	Implementation was hampered by the government's reliance on hard-copy workflows, leading to the physical loss of the ratification dossier during a handover. The lack of "internet culture" and connectivity in ministries forces a slower pace for approvals and limits the immediate utility of digital databases
Cross-reference(s) to relevant paragraphs	70, 78, 80

Lesson Learned #3:	South-south cooperation offers superior cost-effectiveness and cultural compatibility for capacity building in regional biodiversity contexts
Context/comment:	The strategic pivot from distant partners to the Indonesian Research Agency (BRIN) overcame delivery bottlenecks. Regional partners shared similar ecological and cultural contexts, making knowledge transfer more efficient than North-South models
Cross-reference(s) to relevant paragraphs	119, 133

Lesson Learned #4:	Anchoring technical knowledge in academic institutions creates resilience against government administrative turnover
Context/comment:	While government focal points changed frequently due to political instability, losing institutional memory, the integration of ABS curricula into national universities (ICS, UNPAZ, UNDIL) created a permanent, resilient reservoir of national capacity
Cross-reference(s) to relevant paragraphs	Table 15 (4th line), 127

Lesson Learned #5:	"Defensive protection" of Traditional Knowledge through offline documentation allows for ethical project delivery amidst legal vacuums
Context/comment:	To mitigate biopiracy risks while the law remained unratified, the project archived sensitive community knowledge in offline booklets rather than open databases. This innovatively upheld "Do No Harm" principles while meeting donor requirements

Cross-reference(s) to relevant paragraphs	71, 111, 114
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Lesson Learned #6:	Gender-responsive ABS implementation and human rights protection require distinct documentation of women's specific custodial roles and the rigorous application of Free, Prior and Informed Consent (FPIC)
Context/comment:	The project successfully operationalised human rights and gender equity by moving beyond merely tracking female participation (which reached 48%). By fundamentally operationalising the human right to Free, Prior and Informed Consent (FPIC), the project established a legal precedent that empowers indigenous communities to grant or withhold access to their genetic resources. By conducting separate, safe-space focus group discussions with women, the project explicitly documented their unique intellectual property regarding medicinal plants in the Community Protocols. This "defensive protection" approach directly addresses the risk of biopiracy and ensures that future benefit-sharing mechanisms will reflect their specific contributions, effectively transforming women and local communities from passive project beneficiaries into recognised rights-holders.
Cross-reference(s) to relevant paragraphs	Table 17 (Section 3. Responsiveness to human rights and gender equality); Section IV (Responsiveness to Human Rights and Gender Equality); Section IV (Environmental and Social Safeguards)

C. Recommendations

Recommendation #1:	Urgent Resubmission and Digital Tracking of the Nagoya Protocol Ratification
Challenge/problem to be addressed by the recommendation:	The "Ratification Package" (Nagoya Protocol and ABS Decree-Law) has been technically completed but remains legally dormant due to administrative failures, including the physical (temporary?) loss of dossiers, and shifting political priorities. Without ratification, the entire ABS regime lacks the legal force to issue permits or enforce benefit-sharing, rendering the project's primary outcome unachieved
Priority Level:	Critical
Type of Recommendation	Partners (Government of Timor-Leste)
Responsibility:	National Directorate of Biodiversity (NDB)
Proposed implementation time-frame:	Within 6 months of project closure

Cross-reference(s) to rationale and supporting discussions:

56, Table 13, Table 14, Table 15, 98, 105, 116, 120

Recommendation #2:	Integration of Digital Infrastructure Costs into Recurrent State Budget
Challenge/problem to be addressed by the recommendation:	The National Biodiversity Database and ABS Clearing-House are technically operational but face a high risk of becoming "digital cemeteries" due to the lack of a secured recurrent state budget for web hosting, domain renewal, and especially basic internet access in government offices

Priority Level:	Critical
Type of Recommendation	Partners (Government of Timor-Leste)
Responsibility:	Ministry of Tourism and Environment (MTE) / National Directorate of Biodiversity
Proposed implementation time-frame:	Immediate (next budget cycle)

Cross-reference(s) to rationale and supporting discussions:

41, 55, 71, 74, 61, 61

Recommendation #3:	Simplified Direct Procurement for Laboratory Operationalisation
Challenge/problem to be addressed by the recommendation:	The National Biodiversity Laboratory remains unequipped due to procurement failures and vendor non-performance, leaving the country dependent on foreign partners for chemical analysis. A new procurement strategy is required to utilise any remaining or future funds effectively to bridge this "hard" capacity gap. The Executing Agency must launch a simplified, direct procurement process for the remaining essential laboratory equipment (specifically cabling and basic analytical instruments) to enable the transition from renovation to operation
Priority Level:	Important
Type of Recommendation	Project level
Responsibility:	Executing Agency (NDB)
Proposed implementation time-frame:	Immediate (during financial closure or next project phase formulation)

Cross-reference(s) to rationale and supporting discussions:

56, Table 16, 71, 75, 91

Recommendation #4:	Development of a Tiered-Access Digital Portal for Traditional Knowledge
Challenge/problem to be addressed by the recommendation:	The "defensive protection" of Traditional Knowledge (TK) in offline booklets was a necessary interim measure, but it limits the potential for equitable benefit-sharing. A secure, gender-responsive mechanism is needed to selectively disclose this knowledge to trustworthy commercial partners under the new legal framework, ensuring women (as primary knowledge holders) act as key decision-makers in these negotiations. Future project phases must design and implement a secure, tiered-access digital portal that allows communities to selectively share this archived knowledge with verified commercial partners under strict legal safeguards
Priority Level:	Project level
Type of Recommendation	Project Level (Future Phase design)
Responsibility:	UNEP Task Manager and Future Project Formulation Team

Proposed implementation time-frame:	During the design of the next GEF cycle project
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Cross-reference(s) to rationale and supporting discussions:

15, 111, 70, Table 13, 126

Recommendation #5:	Legal Formalisation of the ABS Technical Committee
Challenge/problem to be addressed by the recommendation:	Institutional memory is fragile due to high staff turnover and political restructuring. The project successfully embedded curricula in universities, but government focal points remain volatile. Formalising the ad-hoc "ABS Technical Committee" into a permanent statutory body with a dedicated budget is essential to survive administrative changes. The Ministry should issue a formal decree to transform the current ad-hoc ABS Technical Committee into a permanent statutory body, ensuring it retains its mandate and composition regardless of individual staff turnover
Priority Level:	Opportunity for Improvement
Type of Recommendation	Partners
Responsibility:	National Directorate of Biodiversity
Proposed implementation time-frame:	Within 12 months

Cross-reference(s) to rationale and supporting discussions:

67, 102, 107, 127, Table 15

Recommendation #6:	Mandate explicitly budgeted Gender Action Plans and baseline data for all future Access and Benefit-Sharing (ABS) initiatives
Challenge/problem to be addressed by the recommendation:	At the design stage, the project was assigned a Gender Marker of 1 (gender partially mainstreamed) because it relied on an implicit assumption that women and men would participate equitably, rather than establishing explicit, budgeted gender-specific actions or indicators. Consequently, there was no baseline data established to monitor the participation of women and marginalised groups at the project's outset. While the executing partners later adapted well by conducting specific focus groups with women to document their unique Traditional Knowledge, the initial lack of formalized, explicitly designed metrics made it difficult to systematically enforce and monitor equitable participation in Prior Informed Consent (PIC) and Mutually Agreed Terms (MAT) processes from the very beginning
Priority Level:	Important
Type of Recommendation	Project Level (Future Phase design) / Partners

Responsibility:	UNEP Task Manager, Executing Agency (MTE/NDB), and the future project formulation team.
Proposed implementation time-frame:	During the design and PPG (Project Preparation Grant) phase of any subsequent GEF-funded biodiversity or ABS project in Timor-Leste.

Cross-reference(s) to rationale and supporting discussions:

Section II (Quality of Project Design); Section IV (Responsiveness to Human Rights and Gender Equality); Section IV (Monitoring and Reporting).

ANNEX I. RESPONSE TO STAKEHOLDER COMMENTS
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Page Ref	Stakeholder comment	Reviewer Response

ANNEX II. REVIEW FRAMEWORK / MATRIX

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
Strategic Questions		
What evidence exists that the project contributed to establishing a national ABS legal and institutional framework?	Document review; interviews (UNEP TM, PMU, MDIR, legal consultants); verification of draft	ProDoc; draft ABS regulations; PIRs 2021–2025; SARs; MTR
What evidence exists that the project increased national capacity for research and monitoring of genetic resources?	Interviews (PMU, UNTL, CI, BRIN, GBIF); review of training materials; site visits	Training materials; PIRs; SARs; MTR
What adjustments were made in response to COVID-19 and how did these affect project performance?	Timeline analysis; interviews	PIRs 2021–2023; MTR
What lessons can inform a potential next phase of ABS work in Timor–Leste?	Synthesis; interviews	All project documentation; stakeholder consultations
Strategic relevance		
To what extent is the project aligned with UNEP’s Medium-Term Strategy and Programme of Work?	Document review; UNEP interviews	ProDoc; UNEP MTS; PIRs
To what extent is the project aligned with GEF priorities on ABS (BD-3 / Programme 8)?	Document review	ProDoc; GEF guidance
To what extent is the project aligned with national biodiversity priorities and policy frameworks?	Government interviews; policy analysis	NBSAP; national legislation; ProDoc
To what extent is the project coherent and complementary with other ABS initiatives in Timor-Leste?	Stakeholder interviews; mapping	PIRs; partner reports (CI, UNTL, GBIF, BRIN)
Quality of Project Design		
Was the project design technically sound, internally coherent, and realistic?	Design assessment; TOC reconstruction	ProDoc; TOC (original and revised)
Were risks and assumptions adequately identified, realistic, and monitored?	Risk log review; interviews	ProDoc; PIRs; MTR
Nature of External Context		
How did the political, institutional or socio-economic context influence project performance?	Interviews; contextual analysis	MTR; PIRs; national policy context

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
How did the COVID-19 pandemic affect project timelines, access, coordination and results?	COVID analysis; interviews	PIRs 2021–2023; MTR
Effectiveness		
Availability of Outputs		
To what extent were planned project outputs delivered as intended?	Document verification; triangulation	PIRs; SARs; deliverables; MTR
Achievement of Project Outcomes		
To what extent did the delivered outputs contribute to achieving planned project outcomes?	Outcome mapping; contribution analysis	PIR; revised TOC; PIRs; MTR
Likelihood of impact		
To what extent are the conditions in place for long-term impacts to materialize?	TOC assessment; triangulation	TOC (original and revised); PIRs
Financial Management		
Were financial management processes (planning, disbursement, oversight) timely, transparent and adequate?	Financial review; UNEP finance interviews	PIRs; UNEP financial records
Were co-financing commitments realised as planned?	Document review	PIRs; MTR
Efficiency		
Did the project deliver results in a cost-effective and timely manner?	Efficiency analysis; interviews	PIRs; SARs; MTR
How did delays, procurement issues, or staffing gaps affect efficiency?	Resource-use analysis	PIRs; MTR
Monitoring and Reporting		
Monitoring of project implementation		
Was the project's monitoring system adequate to track progress and support decision-making?	Review of PIRs/SARs; interviews	PIRs; SARs; MTR
Project reporting		
Were project reports timely, accurate, and compliant with UNEP/GEF requirements?	Review of PIRs/SARs; interviews	PIRs; SARs; MTR
Sustainability		
Socio-political sustainability		
Is there sufficient political commitment to sustain ABS implementation beyond the project?	Government interviews	PIRs; national policy statements

REVIEW QUESTIONS	METHODS	SOURCES OF INFORMATION
Financial sustainability		
Are financial resources likely to be available to sustain ABS structures, data systems, and capacity?	Budget analysis; interviews	Government budgets; PIRs
Institutional Sustainability		
Are national institutions adequately prepared and motivated to continue ABS implementation?	Capacity assessment; interviews	ProDoc; training reports; MTR
Factors affecting project performance and cross cutting issues		
Quality of project management and supervision		
How adequate were PMU management arrangements and UNEP supervision?	Interviews; documentation review	PIRs; MTR
Stakeholder participation and cooperation		
To what extent did stakeholders (government, research institutions, TK holders, communities) participate meaningfully and cooperatively?	Interviews; field visits	PIRs; SARs; consultation records
Responsiveness to human rights and gender equity		
To what extent did the project respond to gender equality, human rights obligations, and inclusion of marginalised groups?	Participation analysis; interviews; gender review	ProDoc; revised TOC; site visit data
Environmental and social safeguards		
Were environmental and social safeguard risks adequately identified and managed?	Safeguard review	ProDoc ESERN
Country ownership and driven-ness		
To what extent did national institutions demonstrate ownership of project processes and outcomes?	Interviews; governance analysis	PIRs; MTR; ProDoc
Communication and public awareness		
How effective were project communication and knowledge-sharing activities in promoting ABS awareness in Timor-Leste?	Review of materials; interviews	Outreach products; SARs; PIRs

ANNEX III. PEOPLE CONSULTED DURING THE REVIEW

People consulted during the Review

Organisation	Position	Role in the project	Gender
Community	Chefe de Suco (Atauro Is.)	Beneficiary	Male
Delegation of the European Union to Timor-Leste	Programme Manager	Co-financer	Female
Instituto de Ciências da Saúde	Pharmacy Head Department	Beneficiary	Female
Ministry of Agriculture, Fisheries and Livestock	Chief Department Fisheries	Beneficiary	Male
Ministry of Agriculture, Fisheries and Livestock	Senior Researcher	Beneficiary	Male
Ministry of Agriculture, Fisheries and Livestock	Senior Researcher	Beneficiary	Male
Ministry of Environment & Tourism	Chief of the Department of Biodiversity and ABS	Competent National Authority (CNA) for the Nagoya Protocol	Male
Ministry of Environment & Tourism	Focal Point	Project Facilitator	Male
Ministry of Environment & Tourism	Laboratory Operator	Laboratory Equipment Beneficiary	Male
Ministry of Environment & Tourism	National Director of Biodiversity	National Project Director	Male
Ministry of Environment & Tourism	Procurement Director	Laboratory Equipment Procurement	Male
Ministry of Health	Health Laboratory Operator	Beneficiary	Female
PMU (contractual)	Consultant	Administration and Finance	Female
PMU (contractual)	Consultant	Biodiversity and Bioprospecting Specialist	Male
PMU (contractual)	Project Manager	Oversee project implementation	Male
PMU (contractual)	Consultant	Biotechnology and Bioprospecting Specialist	Female
Prin Company	Technical Specialist	IT Contractor	Male
TK private company	Director	Beneficiary	Male
UNEP	Coordination Consultant (Interim Task Manager)	Project oversight and technical guidance	Female
UNEP	Task Manager	Project oversight and technical guidance	Female
UNEP	FMO	Finance/ Programme support	Female
UNEP	Finance and budget assistant	Finance/ Programme support	Female
UNEP	Programme Management Assistant	Programme support	Male
Universidade da Paz	Chief, Technical Agriculture Department	Beneficiary	Male
Universidade Dili	Dean, Health Science Faculty	Beneficiary	Female

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ANNEX V. REVIEW ITINERARY

Date	Location	Position	Institution
6/11/25	Remote	Coordination Consultant (Interim Task Manager)	UNEP
		Senior Programme Management Assistant	UNEP
		Programme Management Assistant	UNEP
Project Manager		UNEP (contractual)	
10/11/25		Project Manager	UNEP (contractual)
01/12/25		Project Manager	UNEP (contractual)
8/12/25	Díli	Project Manager	UNEP (contractual)
09/12/25		Biodiversity and Bioprospecting Specialist	UNEP (contractual)
		Biodiversity and Bioprospecting Specialist	UNEP (contractual)
		Admin/Fin Specialist	UNEP (contractual)
		Senior Researcher	Ministry of Agriculture, Fisheries and Livestock
		Senior Researcher	Ministry of Agriculture, Fisheries and Livestock
		Finance Officer	UNEP (contractual)
		Pharmacy Head Department	Instituto de Ciências da Saúde
		Chefe de Suco	Community, Atauro Is.
		Focal Point	Ministry of Environment & Tourism
		10/12/25	Dean, Health Science Faculty
Project Manager			UNEP (contractual)
Procurement Director			Ministry of Environment & Tourism
11/12/25		Chief Department Fisheries	Ministry of Agriculture, Fisheries and Livestock
		Laboratory Operator	Ministry of Environment & Tourism
		Technical Specialist	Prin Company
		Chief, Technical Agriculture Department	Universidade da Paz
12/02/25		Health Laboratory Operator	Ministry of Health
		National Director of Biodiversity	Ministry of Environment & Tourism
		Competent National Authority (CNA) for the Nagoya Protocol	Ministry of Environment & Tourism
		Project Manager	UNEP (contractual)
13/02/25	Balibar	Director	TK private company

		Project Manager	UNEP (contractual)
		Biodiversity and Bioprospecting Specialist	UNEP (contractual)
15/12/25	Remote	Programme Manager	Delegation of the European Union to Timor-Leste
18/12/25		International Bioprospecting Specialist	International Consultant
05/01/26		Programme Manager	Conservation International Timor Leste
13/01/26		Task Manager	UNEP
19/02/26		Programme Management Assistant	UNEP

ANNEX VI. ENVIRONMENTAL AND SOCIAL SAFEGUARD ASSESSMENT

ESS PLANNING AT PROJECT DESIGN	
List any ESS issues identified at project design (e.g. SS 1.7, SS 2.3, etc.)	• SS 1: Biodiversity, ecosystems and sustainable natural resource management: challenges associated with the collection and utilization of genetic resources, the need to ensure strictly sustainable harvesting practices during biological sampling, and the imperative to avoid risks to endangered species and legally protected habitats • SS 2: Climate change and disaster risks: issues related to the vulnerability of target ecosystems and genetic resources to climate change impacts (such as rising sea temperatures and altered precipitation), as well as potential natural hazards affecting field operations • SS 5: Cultural heritage: safety cautions and risks associated with the identification, protection, and potential commercialization of intangible cultural heritage, specifically the threat of misappropriation of Traditional Knowledge (TK) and local practices • SS 7: Indigenous peoples: issues related to conducting research and utilizing natural resources on lands and territories claimed by Indigenous and Local Communities (ILCs), emphasizing the need to secure Free, Prior and Informed Consent (FPIC) and establish equitable benefit-sharing (MAT) to protect community rights • SS 8: Gender Equity: the need to ensure equitable benefit-sharing and prevent discrimination, specifically recognizing that women are often the primary holders of specific traditional knowledge and must be actively included in Prior Informed Consent (PIC) negotiations
For any ESS issues identified at project design, were <u>mitigation strategies</u> developed (Y/N)? (If yes, briefly describe)	Yes. Mitigation strategies included: a planned sub-contract with Conservation International (CI) to lead community consultations, ensure Free, Prior and Informed Consent (FPIC), respect community ownership over genetic resources, and develop Community Protocols and Mutually Agreed Terms (MAT) to address impacts on Indigenous Peoples and Cultural Heritage (SS 5, SS 7). For Biodiversity (SS 1), the project mandated sustainable harvesting practices for sampling activities and planned procedures for the safe disposal of laboratory chemical waste. For Climate Change risks (SS 2), the project planned to collaborate closely with the National Directorate for Climate Change
Were any <u>gaps</u> in ESS issues identified at the review inception phase (Y/N)? (If yes, briefly describe)	Yes. The Terminal Review Inception Report identified several gaps: mechanisms for broader social conflict sensitivity were less developed compared to TK and consent practices. Environmental footprint considerations, such as detailed fieldwork impacts and laboratory waste management, were not explicitly

	discussed at the design stage. Finally, the analysis of marginalized groups and gender was limited, lacking targeted baseline metrics and explicit strategies
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ESS MONITORING AT PROJECT IMPLEMENTATION	
Is there evidence that the potential emergence of ESS issues was actively <u>monitored</u> during project implementation (Y/N)? (If yes, briefly describe)	Yes. MTR and PIRs confirm active monitoring of environmental and social safeguards. The monitoring and evaluation framework measured compliance with safeguard measures, including strict oversight of FPIC procedures in the Larisula and Macadade pilot communities before biological sample collection or Traditional Knowledge (TK) sharing
Is there a justification for the absence of ESS monitoring (Y/N)? (If yes, briefly describe)	N/A (Monitoring was conducted).

MANAGEMENT RESPONSIVENESS DURING PROJECT IMPLEMENTATION	
Identify the ESS issues/events <u>triggered</u> by the project.	Risk of "biopiracy" and misappropriation of Traditional Knowledge (TK) due to the unratified Nagoya Protocol, leaving the country without formal protections for community intellectual property Risk of raising false expectations among local communities regarding immediate commercial and monetary benefits from bioprospecting activities
Describe <u>consequences</u> of ESS issues/events during project implementation.	Publishing sensitive Traditional Knowledge and genetic data onto the open-access National Biodiversity Database without a ratified national ABS law risked pilot communities permanently losing control over their intellectual property Unmanaged expectations regarding commercial benefits risked creating frustration, disillusionment, and a breakdown of trust between the government, researchers, and communities
Describe the management response and identify supporting documentation.	PMU and Government adopted a "defensive protection" strategy against biopiracy. The project archived sensitive community TK in offline, physical photo booklets (translated into Tetum) returned directly to knowledge holders in Larisula and Macadade, rather than uploading data to the National Database The project communicated the long timelines associated with bioprospecting to communities, ensuring initial agreements focused purely on "research only" rather than immediate commercialization
Were negative ESS effects offset by management response (Y/N)? (If yes, briefly describe)	Yes. The "defensive protection" strategy offset the risk of TK misappropriation, balancing the donor's requirement for data digitization with the ethical imperative to protect indigenous intellectual property rights in a fragile legal environment. Strict collection protocols developed with BRIN restricted bioprospecting to non-threatened species and minimal sample sizes, offsetting potential ecological damage

ANNEX VII. COMMUNICATION AND OUREACH TOOLS

<https://biodiversity.mta.gov.tl/>

<https://abschm.mta.gov.tl/>

ANNEX VIII. BRIEF CV OF THE REVIEWER

Name Vincent LEFEBVRE

Profession	Agronomist
Nationality	Belgian
Country experience	• Europe: Belgium • Africa: Angola, Benin, Botswana, Burkina Faso, Cabo Verde, Cameroon, Chad, Democratic Republic of the Congo, Republic of the Congo, Eritrea, Ethiopia, Gabon, Guinea, Guinea-Bissau, Ivory Coast, Malawi, Mali, Mauritania, Mauritius, Mozambique, Niger, Nigeria, Rwanda, Senegal, Sierra Leone, Tanzania, Togo, Tunisia, Uganda, Zambia • Americas: Argentina, Bolivia, Brazil, Chile, Colombia, Costa Rica, Cuba, Dominican Republic, Ecuador, El Salvador, Grenada, Haiti, Honduras, Mexico, Peru, Uruguay • Asia: Cambodia, Laos, Tajikistan, Thailand, Timor-Leste, Uzbekistan, Vietnam • Oceania: Fiji, Kiribati, Marshall Islands, Micronesia, Nauru, Palau, Papua New Guinea, Samoa, Solomon Islands, Tonga, Tuvalu, Vanuatu, Cook Islands, Niue, Tokelau
Education	• Tropical Agriculture Engineer

Vincent Lefebvre is an environmental and climate change specialist with over 25 years of international experience in project management, evaluation, and technical audits. Born on October 19, 1967, in Belgium, he holds a Master's degree in Agronomy from the Université Catholique de Louvain, with further qualifications in Business Administration and Communication for Environmental Protection. Proficient in several languages, including French, English, Portuguese, Spanish, and Dutch, he has worked extensively across Africa, Latin and Central America, the Caribbean region, Central Asia, Southeast Asia, and the Pacific.

Key specialities and capabilities cover Project formulation, monitoring, and evaluation (M&E), Climate change mitigation and adaptation strategies, Sustainable land and water management, Biodiversity conservation and natural resource governance, Agro-forestry, climate-smart agriculture, and renewable energy, Geographic Information Systems (GIS), remote sensing, and cartography, Institutional capacity building and cross-sectoral policy integration...

Over his career, Lefebvre has led and participated in over 80+ independent reviews and evaluations, for international organisations such as UNEP, UNDP, GEF, and the European Union. Selected assignments and experiences include:

- Mid-term evaluation of the BIOPAMA Programme (budget: 80M EUR), focusing on biodiversity and protected area management in Africa
- Terminal evaluation of the Burkina Faso Climate Transparency Framework (budget: 2M USD), assessing gaps in institutional arrangements and climate data systems
- Independent review of the African Union Research Grants Program (budget: 17M USD), focusing on climate resilience in agriculture across multiple African countries
- Final evaluation of the Mainstreaming Biodiversity in Tourism project in Cape Verde (budget: 6M USD), assessing coastal and marine biodiversity conservation efforts

- Mid-term recomponent view of the "Africa Adaptation Initiative" (budget: 12M USD), which supports African governments in building resilience to climate change and mainstreaming adaptation into national policies
- Final evaluation of the "Climate Resilient Agriculture in Sub-Saharan Africa" project (budget: 10M USD), which developed climate-smart agriculture techniques while strengthening institutional frameworks in rural areas
- Institutional evaluation of the "Climate Governance Capacity Development Project" in Mozambique (budget: 5M USD), focused on building government capacity for integrating climate risk into national policies and developing cross-sectoral climate governance frameworks

His expertise spans policy development, technical assistance, and capacity building, and his work has contributed to advancing global and regional environmental governance. Currently, he continues to work as an independent consultant, leading evaluations and fostering environmental sustainability in various international contexts.

ANNEX IX. GEF PORTAL INPUTS

The following table contains text to be uploaded to the GEF Portal. **It will be drawn from the Review Report, either as copied or summarised text.** In each case, references should be provided for the paragraphs and pages of the report from which the responses have been copied or summarised.

Table 18: GEF portal inputs

Question: What was the performance at the project's completion against Core Indicator Targets? (For projects approved prior to GEF-7²⁹, these indicators will be identified retrospectively and comments on performance provided³⁰).

Response:

Although the project was approved under GEF-6, its performance was assessed retrospectively against relevant Core Indicators, revealing strong results in capacity building despite a "zero baseline" starting point. Regarding Core Indicator 11 (Beneficiaries), the project significantly exceeded its targets, engaging over 73 verified high-level stakeholders (including Director Generals and University Rectors) and achieving approximately 48% female participation in community consultations and technical training. This created a critical mass of human capital in a sector that previously did not exist in Timor-Leste. Regarding Core Indicators 1 and 2 (Protected Areas/Landscapes), the project successfully piloted Bio-Community Protocols in Larisula (representing terrestrial ecosystems) and Macadade (representing marine/coastal ecosystems). These protocols effectively established local governance mechanisms for genetic resources and Prior Informed Consent (PIC) in these high-biodiversity areas. However, a critical distinction must be made between technical readiness and legal status: while the technical compliance frameworks are fully in place—including defined boundaries and local custodianship—the formal national recognition of these protected mechanisms awaits the legislative ratification of the Nagoya Protocol. Consequently, these areas are operationally ready to function as ABS sites but remain legally pending until the "Missing Middle" (parliamentary adoption) is resolved.

References: 1522, Table 14 (Outcome 1.2), 111, 123, 130

Project Performance against GEF Core Indicator Targets

GEF Core / Sub Indicators	Mid-term Target	End-of-project Target	Total Target	Materialized to date (Completion)	Remarks / Location
1.2 - Terrestrial under improved management effectiveness (hectares)	3,635	3,635	3,635	3,635	1 Terrestrial Protected Area: Suco of Lari Sula at Mt. Legumau in Baucau municipality (3,635 hectares).
2.2 - Marine protected areas under improved management effectiveness (hectares)	13,252	13,252	13,252	13,252	1 Marine Protected Area: Macadade Village, Atauro Special Region, Timor-Leste.

²⁹ The GEF is currently operating under the seventh replenishment period of the GEF Trust Fund covering the period July 1, 2018 to June 30, 2022. The GEF Portal Reporting Guide for FY20 Reporting Process indicates that GEF-6 projects that have yet to map existing indicators to GEF-7 Core Indicators need to do so at MTR stage or (if already there) at the time of the TE. (i.e. not GEF projects approved before GEF-6)

³⁰ This is not applicable for Enabling Activities

11.1 - Number of direct beneficiaries disaggregated by gender (Male)	188	1,250	1,500	810	Verified male participants across community consultations, institutional trainings, and high-level engagements.
11.2 - Number of direct beneficiaries disaggregated by gender (Female)	156	1,235	1,500	830	Verified female participants, demonstrating strong gender-responsive engagement (over 50% of total materialized beneficiaries).
Question: What were the progress, challenges and outcomes regarding engagement of stakeholders in the project/program as evolved from the time of the MTR?					
Response: Stakeholder participation followed a distinct and volatile "U-shaped" trajectory: engagement was strong at design, collapsed during the "stagnation years" (2020–2022) due to a 1.5-year leadership vacancy and COVID-19, but recovered strongly in the final phase (2023–2024). The project successfully remediated the "Unsatisfactory" engagement levels noted at the Mid-Term Review (MTR) by formalising roles for key partners to bridge capacity gaps. Conservation International (CI) was contracted to lead community engagement, effectively leveraging pre-existing trust relationships in pilot sites to secure Prior Informed Consent, avoiding the delays of building new networks from scratch. Simultaneously, the project executed a strategic pivot to south-south cooperation to replace the originally planned Australian partners (MAGNT), who withdrew due to administrative barriers. The project engaged the Indonesian Research Agency (BRIN) and a consortium of local universities (UNTL, UNDIR, UNPAZ) to fill technical gaps. This adaptive management ensured that by project closure, engagement was broad, ranging from local Lia Nain (traditional custodians) to university rectors. However, high-level inter-ministerial alignment remained a critical challenge; frequent government restructuring and the rotation of Director Generals meant the PMU had to constantly "re-brief" new officials, and the "Ratification Package" was even physically lost during a ministerial office move, highlighting the fragility of institutional memory. References: 13, 109, 110, 116					
Question: What were the completed gender-responsive measures and, if applicable, actual gender result areas?					
Response: The project demonstrated Satisfactory responsiveness, achieving a Gender Marker score of 2A (Gender well mainstreamed), despite lacking a standalone Gender Action Plan at the design stage. Beyond simply meeting quantitative targets (reporting 48% female participation in key training events), the project achieved significant qualitative results regarding custodianship and intellectual property. Recognising that women are the primary holders of traditional knowledge regarding medicinal plants and natural dyes, the project implemented specific measures to protect their rights. In the pilot communities of Larisula and Macadade, specific focus group discussions were held exclusively with women to document their unique roles. Consequently, the resulting Bio-Community Protocols explicitly recognise women's distinct intellectual property rights. This ensures that in any future benefit-sharing negotiations, women are positioned as key decision-makers and rights-holders rather than passive beneficiaries. This structural recognition is critical for preventing the marginalisation of women in commercial agreements, effectively transforming them from "participants" in a project to "owners" of genetic resources. Reference: 63, Lesson learned #8					
Question: What was the progress made in the implementation of the management measures against the Safeguards Plan submitted at CEO Approval? The risk classifications reported in the					

latest PIR report should be verified and the findings of the effectiveness of any measures or lessons learned taken to address identified risks assessed.

Response:

Implementation of safeguards was Satisfactory, strictly adhering to "Do No Harm" principles in a sensitive legal environment. Social safeguards were managed through the operationalisation of Free, Prior and Informed Consent (FPIC), establishing a legal precedent that empowers communities to grant or withhold access.

To mitigate the specific risk of "biopiracy" and misappropriation of knowledge in the absence of a ratified national law, the project adopted an innovative "defensive protection" strategy. Sensitive Traditional Knowledge inventories were archived in offline booklets and returned directly to communities rather than being published on the open-access National Database. This ensured that community intellectual property was protected until legal safeguards are enforceable.

Environmental safeguards were upheld by strict collection protocols developed with BRIN, limiting bioprospecting to non-threatened species and minimal sample sizes (e.g., 20 specimens). Risk classifications in the latest PIR were verified as accurate; specifically, the risk of "raising false expectations" was effectively mitigated by transparently communicating the long timelines of bioprospecting and ensuring that initial agreements were for "research only" rather than immediate commercialisation.

References: 112, 113, 114

Question: What were the challenges and outcomes regarding the project's completed Knowledge Management Approach, including: Knowledge and Learning Deliverables (e.g. website/platform development); Knowledge Products/Events; Communication Strategy; Lessons Learned and Good Practice; Adaptive Management Actions?

Response:

The project successfully established Timor-Leste's first sovereign digital infrastructure for biodiversity: the National Biodiversity Database and ABS Clearing-House, consolidating over 5,000 records effectively "repatriated" from international collections (Portugal, Indonesia, Netherlands).

Key knowledge products included high-quality flora photo booklets in Tetum, which were physically returned to communities to reverse "extractive" research models. The communication strategy featured high-visibility actions such as youth-focused drawing competitions, TV talk shows, and a "Seeing is Believing" study tour to Malaysia for senior officials, which stakeholders cited as pivotal for understanding the economic potential of ABS.

However, long-term sustainability is threatened by a "Digital Cemetery" risk: the lack of secured government budgets for web hosting, combined with unstable internet access in ministries (described as "analogue latency"), creates a high risk that these dynamic tools will become static, inaccessible offline repositories post-project.

Furthermore, the persistent reliance on hard-copy documentation led to significant administrative hurdles, such as the physical loss (or mishap) of the ratification dossier, underscoring the gap between the project's digital outputs and the government's analogue reality.

References: 2, 74, Table 13 (Outcome 1.2 Awareness & Capacity), 101, 117

Question: What are the main findings of the evaluation?

Response:

Overall performance was Moderately Satisfactory. The project achieved a "technical success" by delivering 100% of the required "soft" infrastructure (Draft Law, Database, Community Protocols) but faced a "political bottleneck" as the Nagoya Protocol remains unratified, rendering the regime legally dormant (the "missing middle").

Critical findings include:

1. Resilience: the project recovered from mid-term stagnation via a strategic pivot to south-south cooperation, replacing Australian partners with the Indonesian Research Agency (BRIN) to improve cost-effectiveness and cultural fit.
2. Infrastructure deficits: "Hard" capacity is constrained by the failure to operationalise the National Laboratory due to procurement failures, leaving the country dependent on foreign analysis.

3. Sustainability risks: financial and institutional sustainability are rated Unlikely without secured state budgets for digital assets and laboratory consumables.

4. Capability trap: the project has created a "capability trap" where technical staff are trained and ready, but legally prohibited from acting, leading to potential disillusionment among stakeholders who were promised benefits that cannot yet be legally realised.

References: 124, 125, 127, 128, 130

ANNEX X. GEF CO-FINANCE

Confirmed sources of Co-financing for the project by name and by type

Sources of Co-financing	Name of Co-financier	Type of Cofinancing	Investment Mobilized	Amount (\$) at CEO	Amount (\$) at MTR ³¹	Amount (\$) at TE
Recipient Government	MDIR	In-kind	Recurrent expenditures	546,000	511,979.30	511,979.30
Recipient Government	MDIR	Grant	Investment mobilized	500,000	0	0
Recipient Country Government	MAF	In-kind	Recurrent expenditures	700,000	116,800	116,800
Recipient Country Government	MAF	Grant	Recurrent expenditures	300,000	0	0
GEF Agency	UNEP	In-kind	Recurrent expenditures	100,000	100,000	100,000
Other	EU	In-kind	Recurrent expenditures	1,100,000	7,500	7,500
Private Sector	NGS	In-kind	Recurrent expenditures	250,000	92,048	92,048
Other	CI	In-kind	Recurrent expenditures	454,000	55,212	55,212
Other	CCB-UNTIL	In-kind	Recurrent expenditures	100,000	73,000	73,000
Total Co-financing				4,050,000	956,539.3	956,539.3

³¹ @ 31/12/2022

ANNEX XI. IMPLEMENTATION PLAN OF RECOMMENDATIONS

Project Title and Reference No.: Establishing the National Framework and Operational Capacity for Implementing the Nagoya Protocol in Timor-Leste - SMA ID: 40209

Contact Person (TM/PM): Kavita SHARMA

	PLANS			
RECOMMENDATIONS	ACCEPTED (YES / NO / PARTIALLY)	WHAT WILL BE DONE?	EXPECTED COMPLETION DATE	RESPONSIBLE OFFICER/ UNIT/ DIVISION/ AGENCY
Urgent Resubmission and Digital Tracking of the Nagoya Protocol Ratification	Partially - The government of Timor Leste may pursue this, since the project has ended and did not include this activity	The recommendation will be shared with the EA through this terminal review report.	N/A	Executing Agency
Integration of Digital Infrastructure Costs into Recurrent State Budget	Partially – the state budget is the mandate of the Govt. of Timor Leste	The recommendation will be shared with the EA through this terminal review report.	N/A	Executing Agency
Simplified Direct Procurement for Laboratory Operationalisation	Partially – procurement is the mandate of the Govt. of Timor Leste	The recommendation will be shared with the EA through this terminal review report.	N/A	Executing Agency
Development of a Tiered-Access Digital Portal for Traditional Knowledge	Partially	There is no planned follow-on project phase for the project under review. However, for future design of similar projects, we will consider this recommendation	N/A	GEF BDLD Unit

	PLANS			
RECOMMENDATIONS	ACCEPTED (YES / NO / PARTIALLY)	WHAT WILL BE DONE?	EXPECTED COMPLETION DATE	RESPONSIBLE OFFICER/ UNIT/ DIVISION/ AGENCY
Legal Formalisation of the ABS Technical Committee	Partially – within the mandate of the Govt. of Timor Leste	The recommendation will be shared with the EA through this terminal review report.	N/A	Executing Agency
Mandate explicitly budgeted Gender Action Plans and baseline data for all future Access and Benefit-Sharing (ABS) initiatives	Yes	There is no planned follow-on project phase for the project under review. However, for future design of similar projects, we will consider this recommendation	N/A	GEF BDLD Unit

ANNEX XII. QUALITY ASSESSMENT OF THE REVIEW REPORT

Quality Assessment of the Terminal Review Report

Review Title: Establishing the National Framework and Operational Capacity for Implementing the Nagoya Protocol in Timor-Leste' (GEF ID 9703)

Consultant: Vincent Lefebvre

All UNEP Reviews are subject to a quality assessment by the UNEP Evaluation Office. This is an assessment of the quality of the review product (i.e. Main Review Report).

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
Section A: Executive Summary	Assessment	
1. Does the Executive Summary act as a concise, accurate standalone section, especially to inform decision-making? Consider how clearly and concisely the report presents: - a clear summary of the review object - review objectives, scope and methodology - the overall project review rating - a summary of main review findings, including key features of performance (strengths and weaknesses) - summary responses to key strategic review questions - summary of main conclusions, lessons learned and recommendations	<u>Coverage/omissions:</u> The Executive Summary is well written and covers all the required elements. A summary response to the key strategic review questions is also provided. <u>Strengths/weaknesses:</u> The Executive Summary presents a comprehensive summary of the main findings based on the assessment of the review criteria.	6
Section B: The Project	Assessment	
2. Does the report clearly describe the key parameters, scale and complexity of the evaluand? Consider how well the report presents: - an overview of the main issue that the project is trying to address - timeline, including dates of project approval, duration and number of phases (where appropriate) - geographic coverage (regions/countries) - total secured budget and project financing, including a table with funding sources - implementing and funding partners - institutional context (i.e. UNEP sub-programme, Division, Branch etc) - implementation structure with diagram - UNEP results frameworks to which it contributes (e.g. PoW Direct Outcome) - summary of results framework as stated in the ProDoc (or as officially revised) - stakeholder groups organised according to relevant common characteristics - whether the project has been evaluated in the past (e.g. mid-term, by an external agency, etc.) - substantive or significant changes in design during implementation	<u>Coverage/omissions:</u> All required elements are adequately addressed. <u>Strengths/weaknesses:</u> The report presents a comprehensive introduction and description of the evaluand. To note, the output statements presented in Table 3 are not the full versions, as instead presented in Table 13 'Availability of Outputs' section, from page 43.	5.5
Section C: Review Methods and Theory of Change	Assessment	

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
3. Does the report present a clear, comprehensive and adequate description of the review methodology? Consider how well it presents the following elements, and their adequacy based on the scope of the review: • statement of the purpose of the review and the key intended audience for the review findings • data collection methods and information sources • justification for methods used (e.g. electronic/face-to-face interviews, qualitative/quantitative analysis) • criteria and sampling strategies used to select stakeholders for consultations, and for sites/countries visited • number and types of respondents (<i>including in a table broken down by gender</i>) • strategies used to increase stakeholder engagement and response rate • methods used to include the voices/experiences of different and potentially excluded groups (e.g. women, marginalised) • data verification methods (e.g. triangulation) • data analysis methods (e.g. scoring, thematic analysis) • review limitations and mitigation measures (e.g. how these were addressed by the evaluator) • consideration for ethics and human rights issues, including how anonymity and confidentiality were protected	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The section presents a comprehensive description of the review methods. Limitations, such as the time constraints and impossibility of conducting field visits, and actions taken to mitigate these are also well explained. Note, Table 5: 'Review respondents and field visits' (page 26) is the table that should have been included in the Inception Report but not in the Final Terminal Review Report. In fact, the table indicates the number of stakeholders 'planned to be contacted'. Instead, the table should have reported the number of the project team members and beneficiaries (direct and indirect) that were involved in the project, those that were contacted at Terminal Review and those that responded. Please refer to Table 6 in the UNEP TR report template.	5
4. Does the report describe an assessment and reformulation of the Theory of Change, and present an adequate articulation of the TOC causal pathways that were used to assess project performance (<i>narratively and diagrammatically</i>)? Consider how well the report presents: • whether the project design included a TOC • how the <i>TOC at review</i>³² was designed (e.g. who was involved, etc) • confirmation/reconstruction of results in accordance with UNEP definitions (<i>including reformulation table, which may have initially been presented in the Inception Report and should appear in the Main Review report.</i>) • articulation of causal pathways • identification of drivers and assumptions • identification of key actors in the change process	<u>Coverage/omissions:</u> The reviewer reconstructed the ToC at Review and reformulated some of the results statements. <u>Strengths/weaknesses:</u> The Reconstructed ToC (RTOC) retained the original wording for all the Project Outcomes and Outputs. However, the Evaluation Office notes that some of the originally approved outcome statements are formulated as results at the output level and, therefore, should have been reformulated at Terminal Review. As explained in the Review tool 01 UNEP Glossary of results definitions December	2.5

³² During the Inception Phase of the review process a *TOC at review Inception* is created based on the information contained in the approved project documents (these may include either logical framework or a TOC or narrative descriptions), formal revisions and annual reports etc. During the review process this TOC is revised based on changes made during project intervention and becomes the *TOC at review*.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
	2023.pdf, an outcome is defined as “a change at institutional level, or changes in behaviors, attitudes or conditions achieved from the use (i.e., uptake, adoption, application) of outputs by intended beneficiaries”. However, some of the original project outcomes adopted at Review refer to strengthening and building capacity of national institutions, which, instead, represent output level results. See examples below: Outcome 1.2: <u>Increased awareness and capacity</u> of national stakeholders on ABS principles, economic potential and procedures under the Nagoya Protocol and the national framework. Outcome 2.1: <u>Institutional capacity enhanced</u> for enacting Article 17 on ‘monitoring’ and Articles 8a & 23 on ‘promoting research’ for sustainable use through consolidation of inventory, cataloguing and fair access to national and internationally held records on biodiversity, genetic resources and traditional knowledge. Outcome 2.2: <u>Enhanced technological and business capacity</u> for bio-prospecting in Timor-Leste, in compliance with the Nagoya Protocol on sustainable utilisation of genetic resources. The following three result statements that were included in the RTOC as Intermediate States should, instead, have been considered as the project outcomes. In fact, such results describe the behavioural change/change in conditions expected at the outcome level: • The national ABS legal and institutional framework is operationalised, with clearly assigned mandates and procedures being applied by competent authorities to regulate access to genetic	

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
	resources and associated traditional knowledge • Key national stakeholders consistently apply acquired knowledge and capacities on ABS principles and procedures in policy, institutional, research and community-level practices. • National systems for biodiversity, genetic resources and traditional knowledge information are routinely used to support monitoring, permitting, research collaboration and compliance with the Nagoya Protocol Moreover, the following Impact statement included in the RTOC should have been presented as an Intermediate State: “Enhanced conservation and sustainable use of biodiversity supported through the establishment and initial operationalisation of a national ABS framework aligned with the Nagoya Protocol” The Impact adopted at Review should have been formulated to describe the long-lasting environmental benefits expected to result directly or indirectly from the project. Lastly, assumptions are considered significant external factors or conditions that should be present for the realization of the intended results but are beyond the influence of the project and its partners. However, some of the Assumptions presented in the RTOC are factors within the sphere of influence of the project, e.g. “Key stakeholders (ministries, researchers, communities) remain engaged in project processes.”	
Section D: Evidence and Analysis	Assessment	
5. Is the report based on sufficient and adequate data and	<u>Strengths/weaknesses:</u>	

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
clear and credible evidence? Consider how well the report presents: • sufficient evidence that is consistent throughout the report • evidence that is supported by data sources (e.g. quotes, reports, etc) • evidence that is explicitly triangulated, unless noted as having a single source • gaps in data are explained and justified • data sources that are reliable, adequate, sufficient for the scope of the review	The report presents sufficient and adequate data. The evidence is also clear.	5
6. Does the report include <i>rigorous analysis</i> and <i>logical findings</i>? Consider the extent to which the findings are: • supported by clear analysis that is consistent with the evidence presented • logical, clear and coherent • aligned with UNEP's Criteria Ratings Matrix • aligned with the review framework • more than descriptions and provide insights into 'how' and/or 'why' the project performed a certain way • balanced, presenting both successes and weaknesses	<u>Strengths/weaknesses:</u> Findings are supported by analysis that is consistent with the evidence presented in the report. The analysis is also balanced and includes both strengths and weaknesses in projects performance.	5
Section E: Review Findings	Assessment	
7. Does the report present evidence and analysis of project <i>Strategic Relevance</i> with respect to UNEP, partner and geographic policies and strategies at the time of project approval? Consider how well the report addresses: • Alignment to the UNEP Medium Term Strategy (MTS), Programme of Work (POW) and Strategic Priorities • Alignment to Donor/GEF/Partners Strategic Priorities • Relevance to Regional, Sub-regional and National Environmental Priorities • Complementarity with Existing Interventions: complementarity of the project at design (or during inception/mobilisation³³), with other interventions addressing the needs of the same target groups.	<u>Coverage/omissions:</u> Required elements are adequately addressed. <u>Strengths/weaknesses:</u> The project's alignment and strategic relevance with respect to UNEP, donors Regional and Global priorities, and complementarity with existing interventions is adequately articulated.	5
8. Does the report present a summary of the strengths and weaknesses of the <i>Quality of Project Design</i>, based on the detailed assessment presented in the Inception Report?	<u>Coverage/omissions:</u> Elements are adequately addressed. The summary table with ratings of the design elements assessed is also presented in this section. <u>Strengths/weaknesses:</u> A concise analysis of the project design's strengths and weaknesses is presented.	³⁴ NOT RATED

³³ A project's inception or mobilization period is understood as the time between project approval and first disbursement. Complementarity during project implementation is considered under Efficiency, see below.

³⁴ The Quality of Project Design criterion is not rated in this table because the majority of the analysis is presented in the Inception Report and the Final Terminal Review report only contains a summary.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
9. Does the report recognise and describe, when appropriate, key features of the Nature of the External Context under which the project was implemented that limited the project's performance (e.g. conflict, natural disaster, political upheaval³⁵), and how they affected performance?	<u>Coverage/omissions:</u> Required elements are adequately addressed. <u>Strengths/weaknesses:</u> The report briefly describes the main events that affected the project implementation, e.g., COVID-10 and the administrative restructuring within the government of Timor Leste.	³⁶NOT RATED
10. Does the report present a well-reasoned, complete and evidence-based assessment of the Availability of Outputs to the intended beneficiaries? Consider how well the report presents: - a convincing, evidence-supported and clear presentation of the outputs made available by the project compared to its approved plans and budget - assessment of the nature and scale of outputs versus the project indicators and targets - assessment of the timeliness, quality and utility of outputs to intended beneficiaries - identification of positive or negative effects of the project on disadvantaged groups, including those with specific needs due to gender, vulnerability or marginalisation (e.g. through disability).	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The reviewer provided a detailed evidence-based assessment of the level of achievement of each output.	6
11. Does the report present a well-reasoned, complete and evidence-based assessment of the Achievement of Outcomes, as a result of the uptake, adoption and/or implementation of outputs by the intended beneficiaries? This may include behaviour changes at an individual or collective level. Consider how well the report presents: - a convincing and evidence-supported analysis of the uptake of outputs by intended beneficiaries - assessment of the nature, depth and scale of outcomes versus the project indicators and targets - discussion of the contribution, credible association and/or attribution of outcome level changes to the work of the project itself - any constraints to attributing effects to the projects' work - identification of positive or negative effects of the project on disadvantaged groups, including those with specific needs due to gender, vulnerability or marginalisation (e.g. through disability).	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The reviewer provided a detailed and evidence-based analysis of the achievement of the four project outcomes.	5.5
12. Does the report present an integrated analysis, guided by the causal pathways represented by the TOC, of all evidence	<u>Coverage/omissions:</u> All elements well addressed.	5

³⁵ Note that 'political upheaval' does not include regular national election cycles, but unanticipated unrest or prolonged disruption. The potential delays or changes in political support that are often associated with the regular national election cycle should be part of the project's design and addressed through adaptive management of the project team.

³⁶ The Nature of External Context is not rated in this table because it is not consistently applicable across all projects. Some review reports will simply record that there was no unexpected unfavourable external factors, while others may have to describe critical external events.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
relating to Likelihood of Impact ? Consider how well the report presents: - an explanation of how causal pathways emerged and the resulting change processes - an explicit discussion of how drivers and assumptions played out - an explanation of roles played by key actors and change agents - identification of any unintended negative effects of the project, especially on disadvantaged groups, including those with specific needs due to gender, vulnerability or marginalisation (e.g. through disability).	<u>Strengths/weaknesses:</u> To determine the likelihood of Impact, the analysis includes an assessment on whether drivers, assumptions, outputs, outcomes and intermediate states were in place by the end of project implementation.	
13. Does the report present an integrated analysis of all dimensions evaluated under Financial Management and include a completed 'financial management' table? Consider how well the report addresses the following: <i>adherence</i> to UNEP's financial policies and procedures <i>completeness</i> of financial information, including the actual project costs and actual co-financing used and explanation of any variances between planned and actual expenditures	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The report presents an adequate analysis of the two dimensions under Financial Management.	5
14. Does the report present an integrated analysis of all dimensions evaluated under Efficiency ? Consider how well the report presents: - cost-effective or time-saving measures put in place to maximise results within the secured budget and agreed project timeframe - implications of any delays and no cost extensions - discussion of making use, during project implementation, of/building on pre-existing institutions, partnerships and complementarities with other initiatives, programmes and projects etc. - the extent to which the management of the project minimised UNEP's environmental footprint.	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The factors that affected project delivery/efficiency and the measures that were taken to address the issues are presented in this section.	5
15. Does the report present a well-reasoned, complete and evidence-based assessment of the project's Monitoring and Reporting ? Consider how well the report addresses the following: - the quality of <i>monitoring of project implementation</i> (including use of monitoring data for adaptive management) - the quality of <i>project reporting</i> (e.g. PIMS and donor reports)	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> This section presents an adequate assessment of the two dimensions under Monitoring and Reporting.	5
16. Does the report present an integrated analysis of all dimensions evaluated under Sustainability (i.e. the endurance of benefits achieved at outcome level)? Consider how well the report addresses the following: - socio-political sustainability - financial sustainability - institutional sustainability	<u>Coverage/omissions:</u> All elements well addressed. <u>Strengths/weaknesses:</u> The section presents an integrated analysis of the three dimensions under sustainability. A clear indication of whether the project had an exit strategy would have been appreciated.	5
17. Does the report present a well-evidence analysis of the Factors Affecting Performance , <u>either in this section or in cross-referenced sections</u> ?	<u>Coverage/omissions:</u> All elements well addressed.	5

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
<i>These factors are not always discussed in stand-alone sections and may be integrated in the other performance criteria as appropriate. However, if not addressed substantively in this section, a cross reference must be given to where the topic is addressed, and that entry must be sufficient to justify the performance rating for these factors.</i> Consider how well the report addresses the following cross-cutting issues: • quality of project management and supervision³⁷ • stakeholder participation and co-operation • responsiveness to human rights and gender equality • environmental and social safeguards • country ownership and driven-ness • communication and public awareness	<u>Strengths/weaknesses:</u> The report presents a comprehensive assessment of the factors affecting performance as a stand-alone section.	
Section F: Conclusions, Lessons Learned and Recommendations	Assessment	
18. Do the Conclusions present a summative assessment of the evaluand as a whole, reflecting on prominent aspects of the project's performance? Consider how well the conclusions: • provide a compelling narrative and integrated assessment of project project's performance (i.e. achievements and limitations) • add deeper insights and analysis beyond the findings under each individual criterion • are derived from the synthesized analysis of evidence gathered during the review process • provide clear and succinct response to the key strategic questions • address the human rights and gender dimensions of the intervention explicitly (e.g. how these dimensions were considered, addressed or impacted on) • provide lessons that are rooted in real project experiences, describe the context from which they are derived, and do not duplicate recommendations	<u>Coverage/omissions:</u> Elements are well addressed. Responses to the four key strategic questions are also included in this section. Lessons learned from project implementation are presented. <u>Strengths/weaknesses:</u> The section presents an integrated summary of the project's achievements, challenges, strengths and weaknesses.	5.5
19. Does the report present Recommendations for specific action to be taken by identified people/position-holders to resolve concrete problems affecting the project or the sustainability of its results? Consider how well the recommendations: • are clearly formulated and logically derived from the findings and/or conclusions • are feasible to implement within the timeframe and resources available (including local capacities) and specific in terms of who would do what and when • include at least one recommendation relating to strengthening the human rights and gender dimensions of UNEP interventions • represent a measurable performance target in order that the Evaluation Office can monitor and assess compliance with the recommendations. <u>NOTES:</u>	<u>Coverage/omissions:</u> The Review identified six recommendations. <u>Strengths/weaknesses:</u> The Evaluation Office notes that the <i>priority level</i> of Recommendation n.4 was mistakenly indicated as "Project level" on page 79.	5.5

³⁷ In some cases, 'project management and supervision' will refer to the supervision and guidance provided by UNEP to implementing partners and national governments while in others, specifically for GEF funded projects, it will refer to the project management performance of the executing agency and the technical backstopping provided by UNEP. This includes providing the answers to the questions on Core Indicator Targets, stakeholder engagement, gender responsiveness, safeguards and knowledge management, required for the GEF portal.

Report Quality Criteria	UNEP Evaluation Office Comments	Final Report Rating
(i) In cases where the recommendation is addressed to a third party, compliance can only be monitored and assessed where a contractual/legal agreement remains in place. Without such an agreement, the recommendation should be formulated to say that UNEP project staff should pass on the recommendation to the relevant third party in an effective or substantive manner. The effective transmission by UNEP of the recommendation will then be monitored for compliance. (ii) Where a new project phase is already under discussion or in preparation with the same third party, a recommendation can be made to address the issue in the next phase.		
Section G: Report Structure and Presentation	Assessment	
20. Is the report <i>well-structured and complete</i>? Does it: • follow the Evaluation Office structure and formatting guidelines • include all required sections and annexes, as applicable • not exceed 50 pages in length from the Executive Summary to the end of the Conclusion Does the report present information clearly and appropriately? Is it written: • in clear and accessible language • largely free from grammar, spelling and punctuation errors • in an adequate and professional tone • with the use of visual aids, such as maps, graphs tables and photos	<u>Coverage/omissions:</u> The report is complete and follows the Evaluation Office guidelines, even though it slightly exceeds the recommended length of 50 pages. All the required Annexes are included in the report. <u>Strengths/weaknesses:</u> The report is clear and well written. The tone is professional and adequate for an official document. Graphs and tables convey key information.	6
OVERALL REPORT QUALITY RATING		5.1

A number rating 1-6 is used for each criterion: Highly Satisfactory = 6, Satisfactory = 5, Moderately Satisfactory = 4, Moderately Unsatisfactory = 3, Unsatisfactory = 2, Highly Unsatisfactory = 1. The overall quality of the review report is calculated by taking the mean score of all rated quality criteria.

Rating the Report Quality Criteria

Rating (1–6)	Description
6	Provides all content with high quality.
5	Provides all content with minor weaknesses.
4	Provides most content with minor weaknesses.
3	Provides most content with significant weaknesses.
2	Omits substantive content with significant weaknesses.
1	Omits almost all content with major weaknesses.