

Management Response: Implementation Plan for Evaluation Recommendations

General Information

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Evaluation Manager	Stephen Baguma
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Implementation Plan

No	Challenge/problem to be addressed by the recommendation	Recommendation	Priority level	Type of Recommendation	Responsibility	Proposed Implementation time-frame	Acceptance	Reason if not Accepted or Partially Accepted	Management Action(s) to be taken
1	Field visits revealed that at least in one Municipality many mercury-containing lamps replaced during the pilot projects are stored unsafely in municipal facilities. In Municipality of La Guardia these lamps were kept in cardboard boxes, in areas not designed for hazardous waste storage, in a machine room shared with operational equipment. his underscores the need to conduct a field assessment in all beneficiary	Assess the current situation of spent lamps in municipalities, and then establish a contingency plan for safe disposal of mercury-containing lamps	Critical	Partners	MMAYa, Vice Ministry of Environment, DGGIRS, municipalities.	Immediate (within 1–3 months)	Accepted		Request MMAYa, MHE and MPD for a correct final disposal of spent lamps.

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	municipalities to determine the status of replaced luminaires and gather verifiable evidence of their final disposal – for example, an official statement from an MMAyA-certified company confirming that the declared lamps have been duly disposed of. The recurrence of inadequate storage practice of mercury-containing lamps across beneficiary municipalities poses significant environmental and public health risks. This situation highlights an urgent gap in environmental safeguards and raises concerns regarding private sector's capacity to meet its EPR commitments. Without immediate action, mercury exposure risks may occur, and the environmental impact of the project will be undermined								
2	The delayed development and enforcement of MEPS for LED lamps and luminaires resulted from a lack of early engagement of MDPyEP, the ministry legally mandated to issue technical standards. MHE was tasked with coordinating MEPS under the project but lacked the legal mandate, leading to significant bottlenecks. MDPyEP's technical decision-making on energy-related areas lies outside its core expertise and has slowed the MEPS progress, reinforcing the need to consolidate working synergies that can facilitate smoother coordination in the future. This institutional mismatch also created	Formalize a pathway enabling coordination between MHE and MDPyEP for the updating and development of new MEPS for any technology	Important	Partners	MHE and MDPyEP	6 months-1 year	Accepted		Request MHE to formalize a pathway enabling coordination between MHE and MDPyEP for the updating and development of new MEPS for any technology.

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	coordination barriers with IBMETRO, which falls under MDPyEP. Decision-making challenges were three-way involving MHE and MDPyEP and IBMETRO: IBMETRO possessed highly specialized technical knowledge that MHE lacked in the field of energy-consuming appliance measurement, including familiarity with the equipment specifications required to carry out accurate testing and meet the protocols for CCRT and CRTM—both essential for operationalizing the MVE system. As a result, enforcement of MEPS was delayed, and the MVE framework was not fully implemented due to the cancellation of procurement of equipment for CCRT and CRTM. UNEP may be positioned to support this follow-up, mindful of the country's political constraints.								
3	Although Supreme Decree No. 5121 (21 February 2024) authorizes IBMETRO, through the MDPyEP, to issue the Technical Regulation Sample Certificate (CRTM) and the Technical Regulation Compliance Certificate (CCRT) for LED lamps, the cancellation of the photometric laboratory equipment purchase left the institution without the testing capacity required to substantiate certifications within the MVE. As a result, certification issuance did not advance, and IBMETRO, despite MEPS and certification training, was unable to publish and	Ensure the immediate procurement of the equipment required for IBMETRO to guarantee the implementation of the MVE system	Important	Partners	MHE, MDPyEP and IBMETRO	Future Interventions	Accepted		Share recommendation with Government regarding the procurement of the equipment required for IBMETRO to guarantee the implementation of the MVE system.

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	enforce the CRTM and CCRT or effectively support MEPS enforcement under the MVE framework.								
4	Although no formal ex-post survey was conducted at the national level, interviewees reported that some final users and municipalities prefer LED technologies and have integrated LED procurement criteria. However, the absence of ex-ante and ex-post baseline assessments of streetlight operation limited the ability to demonstrate actual project savings and to systematically capture lessons learned from the demonstration projects. Among these lessons, field experience revealed that in municipalities such as La Guardia and Warnes, voltage fluctuations damaged photocells, leading to inefficient use of installed LED streetlights. These issues were not anticipated due to the lack of comprehensive baseline assessments of electrical infrastructure, and while the problem may affect all pilot sites, no data exist to confirm its scale. Moreover, no contingency measures or monitoring mechanisms were in place to detect or correct such problems early on. This resulted in energy waste, reduced performance, and a missed opportunity to refine public lighting programs based on municipal realities. Future replications must be based on technical diagnostics covering voltage stability, grid integration, maintenance	Conduct ex-ante and ex-post baseline assessments of streetlight to demonstrate actual project savings and impacts, and gather lessons learned from the implementation of demonstration projects.	Opportunity for improvement	Partners	UNEP, MHE, Municipal Governments, ENDE Distribution	3–6 months	Accepted		Share recommendation with Government regarding conducting ex-ante and ex-post baseline assessments of streetlight to demonstrate actual project savings and impacts.

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	capabilities, and environmental safeguards. In addition, hazardous waste management practices for mercury-containing lamps remain largely undocumented. While unsafe storage was observed in La Guardia, no systematic information exists for other municipalities, and in cases where the issue may have been resolved, there is no record of how compliance with environmental safeguards was achieved. Documenting such practices, where effective, would allow replication in other municipalities facing similar conditions.								
5	High staff turnover, and weak inter-institutional coordination eroded continuity and institutional memory, delaying the adoption of regulatory instruments and undermining the sustainability of results. Procurement bottlenecks, compounded by unclear ministerial responsibilities, prevented IBMETRO from finalizing its certification role, highlighting the fragility of institutional arrangements. Although the project generated valuable technical deliverables and heightened IBMETRO's awareness of its regulatory responsibilities, the absence of long-term staffing strategies or formal knowledge management mechanisms leaves these gains vulnerable to loss. For future initiatives, it is recommended to establish a working group responsible of compiling technical outputs, regulatory drafts, and	Institutionalize project knowledge by establishing mechanisms to safeguard institutional memory on energy efficiency projects, mitigating the impacts of staff turnover in future initiatives	Opportunity for improvement	Partners	MHE, MMAyA and MDPyEP	For future interventions	Accepted		Share recommendation with Government regarding the institutionalization of mechanisms to safeguard institutional memory.

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	records of inter-agency coordination. This working group can create information system linked to a structured knowledge transfer protocol to facilitate onboarding, preserve institutional memory, and support the operationalization of regulatory functions by permanent units in relevant ministries.								
6	While the GAP met its formal commitments and delivered targeted outreach activities, gender equality and social inclusion were not systematically integrated into the project's technical components. The absence of a dedicated result for gender in the original framework, combined with the lack of gender-disaggregated indicators or targeted actions in the core results framework, limited the project's ability to measure gender-related outcomes. Stakeholder analysis did not segment participants by gender, indigenous identity, or vulnerability, reducing opportunities to address equity considerations in design and implementation. In some cases, participation rates among women reached parity, but integration into procurement processes, technical training, and regulatory workstreams remained minimal. Turnover of gender coordination staff further weakened continuity and documentation, and the monitoring system did not include mechanisms for assessing gender-related results beyond participation	Integrate gender equity and social inclusion into project implementation, monitoring and ex-post impact assessments.	Opportunity for improvement	Project	Gender Focal Points at MHE and MMAyA, UNEP Gender Unit, Project Managers	9 months and future interventions	Accepted		Share recommendation with partners regarding integration of gender equity and social inclusion into project implementation.

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	counts. While anecdotal perceptions of women's suitability for infrastructure tasks were noted in field visits, no systematic study was undertaken to assess their prevalence or impact. Future projects should embed gender considerations into all technical workstreams from inception, define measurable gender indicators within the results framework, ensure gender expertise is represented in procurement and implementation teams, and include ex-post impact assessments to capture outcomes for women and other underrepresented groups.								