

Mid-Term Review Report for the Norad NICFI project 2021-2025

**Building legal foundations for
sustainable forests and livelihoods
project implemented by ClientEarth**

February 2024



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Building legal foundations for sustainable forests and livelihoods project

Report by

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Abbreviations and Acronyms

BF	Brainforest
CA	Community Assembly
CE	ClientEarth
CEO-SE	Cabinet ESSONO ONDO pour le Social et l'Environnement
CFMB	Community Forest Management Body
COP	Conference of Partners - Most recently referred to in relation to the UN Framework Convention on Climate Change (UNFCCC)
CSO	Civil Society Organisation
EC	European Commission
EP	European Parliament
EU	European Union
EUDR	European Union Deforestation Regulation
EUTR	European Union Timber Regulation
FCDO	Foreign and Commonwealth Development Office
FCI	Foundation for Community Initiatives
FDA	Forest Development Authority
FGMC	Forest Governance Markets and Climate
FPIC	Free prior and informed consent
GMTMD	Gabon Ma Terre Mon Droit Platform
HPA	Heritage Partners and Associates LLC
IPLC	Indigenous People and Local Communities
IWG	Inclusive Working Group
INGO	International Non Governmental Organisation
LWG	Legal Working Group
M&E	Monitoring and Evaluation
MEL	Monitoring, Evaluation and Learning
MEP	Member of European Parliament
MS	Member States
MTR	Mid-term Review
NICFI	Norway's International Climate and Forest Initiative
NDC	Nationally Determined Contributions
NGO	Non Governmental Organisation
NORAD	Norwegian Agency for Development Cooperation
NUCFMBSDI	National Union of Community Forest Management Body Sustainable Development Institute
ToR	Terms of Reference
TOT	Training of Trainers

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The MTR was carried out with the invaluable assistance of the ClientEarth personnel and national implementing partners in Gabon and Liberia. Their insight, knowledge, advice, and comments made this review possible.

The review benefited from the inputs of many other stakeholders, including government officers, staff from international NGOs, community leaders and primary project stakeholders. Their contributions were critical to the team's work and are deeply appreciated.

Executive Summary

Background: The ‘Building legal foundations for sustainable forests and livelihoods’ five-year project (2021-2025) seeks to combat deforestation, focusing both on supply-side forest governance reform and demand-side forest commodity supply chain reform. The first objective is to improve and promote community forestry as a tool to enhance forest management and governance, reduce deforestation, conserve biodiversity and generate sustainable development, focussing on Liberia (Outcome 1), Republic of Congo (Outcome 2) and Gabon (Outcome 3). The second objective is to promote and shape import commodity regulations focusing on two of the largest importing markets, the EU (Outcome 4) and China (Outcome 5).

Purpose and Objectives: The purpose of this mid-term review was to gain insight into progress of ClientEarth’s NICFI project towards achieving their desired results. As the mid-way point of the project, it provides an opportunity to reflect on whether the methodology and approach remains appropriate and effective in delivering the project aims. It is intended to inform ClientEarth’s planning for Year 4 and 5, including answering key questions such as: “Are we getting where we want to go” and “How can we redesign some of our activities to fit emerging issues?”. It will also help ClientEarth to identify any needed changes in the ways of working in partnership.

Methodology: The MTR was undertaken using a mainly qualitative mixed methods approach consisting of interviews, focus group discussions, field observations, documentary reviews and a semi-structured survey of members of legal working groups in Gabon and Liberia. In total 162 participants took part in the MTR, with 41% female and 59% male. Thematic and content analytical techniques were utilised and triangulation applied to conclude on the findings of the MTR, as well as to formulate actionable recommendations for the next phase of the project.

Findings

The evaluation findings for ClientEarth’s project across various regions reveal a multifaceted impact and areas for improvement. In terms of project coherence, there is a noted variance in the awareness of Norad-funded grants across regions, coupled with challenges in coordinated stakeholder engagement in the project’s intervention geographies.

The project is well on track to achieve its outcomes and stated outputs. In Liberia, ClientEarth’s collaborative efforts have effectively engaged a range of governmental and civil society actors, focusing on empowering communities and addressing their rights. However, these efforts were more opportunistic than structured, lacking a documented stakeholder strategy, and had limited direct actions aimed at altering private sector behaviours towards communities. In Gabon for instance, the partnership with Brainforest has enhanced community engagement in forest governance by strengthening legal frameworks and facilitating engagement between communities, civil society, and government. Yet, the absence of a strategic stakeholder engagement plan limited the potential for more structured and impactful collaborations.

ClientEarth has effectively influenced EU legislation, particularly in the EU Deforestation Regulation (EUDR), through engagement with civil society and government actors. The organisation’s value-added contribution in Liberia, Gabon, and Europe centred on enhancing legal capacity and frameworks, governance practices, and the EUDR, through tailored training, effective collaboration, and strategic advocacy.

The project’s effectiveness is further demonstrated by its impact on forest community capacities in sustainability, alternative livelihoods, gender inclusion, and biodiversity, through legal and governance training in Liberia. This also includes the development of equitable contract templates and constitution

and by-law templates, empowering communities in forest resource management and negotiations. Challenges in implementing the community forest law framework were addressed by developing equitable Commercial Use Contract templates and standard constitution guidelines.

In Gabon, ClientEarth's interventions have led to increased community forest management knowledge and enhanced governance, increased participation, and stronger collaborative linkages with local administrations. Despite these achievements, ongoing political shifts delayed the finalisation and implementation of critical reforms such as the Forest Code revision and the National Strategy for Community Forestry. The Legal Working Group (LWG) is appreciated, fostering collaboration among civil society organisations in forestry governance, but faces challenges needing more practical field engagement and legal capacity building.

The likelihood of the project's gains continuing beyond the initial implementation period is high, given the significant legal framework advancements, local ownership through capacity building, and robust outreach and partnerships. However, sustainability is potentially constrained by various risks, including social, economic, institutional, political, and environmental factors.

Recommendations

Recommendations from the MTR include the following:

Capacity strengthening

Recommendation 1: Continue capacity strengthening support to national and local stakeholders.

The project has been highly successful in strengthening national and local capacities during the first phase of the project. The MTR emphasises that the issues/challenges that the project seeks to address have been neglected for years and many of them are systemic in nature, requiring a long-term perspective.

The MTR, therefore, recommends that CE should continue in this direction, being flexible and responding to needs as they emerge. Considering the cross-cutting nature of the issues in project intervention areas, creating capacity building and training opportunities bringing together communities from different community forests, management boards, local leaders etc during the next phase of the project will not only achieve its objectives but also enhance the project's learning agenda as suggested in recommendation 7 below. The project team will have to be intentional in ensuring the participation of young men and young women and people with disabilities if identified in the target communities. This effort requires additional effort and budget, and consequently this should be built into future budgeting of the project.

Responsibility: ClientEarth and Partners

Duration: On-going

Gender and inclusiveness

Recommendation 2: Maintain and strengthen focus on gender, youth and people with disabilities.

Communities actively welcomed the gender training and showed enthusiasm to learn about methods to include women in the governance of community forests. There was a desire from women for further training to take up leadership roles, with a need to support the navigation of the election process and express themselves in public forums (Progress Report, Reporting Year 2022). However, it is also reported that the high level of illiteracy of women discourages them from applying for leadership positions such as the Executive Committee chair, or chief officers etc. The importance of involving youth has also been highlighted as key to sustainability of forest governance.

It is therefore recommended that the project:

- builds on the enthusiasm of the trained women to learn about methods to include women in community forest governance. These trainings should be extended to include the election process and to empower them to express themselves in public forums
- works with men, including community leaders and husbands, to increase understanding of women's role in forest governance
- seeks inputs and collaboration from relevant stakeholders, such as the Liberia Land Authority and the Forestry Development Authority, to strengthen the Women's Charter.
- takes a stronger gender transformative approach to the project
- explores practical ways for the greater engagement of young women and young men
- creates a network of women for forest governance to build a gender expertise in forest governance
- makes efforts to address the issue of illiteracy among women, through providing support for education and training that enables them to take up leadership roles within the community.

Responsibility: ClientEarth and Partners

Duration: On-going

Coherence

Recommendation 3: Develop a stakeholder engagement plan to strengthen coherence of interventions and maximise the project's value-added, outreach and impact.

The MTR notes that though the project was engaging with a high number of external stakeholders, these efforts tended to be adhoc and not part of an agreed plan and strategy. The same applies for the mixed knowledge of other on-going Norad initiatives. The private sector remains critical in the achievement of the project's activities, yet there is no clear approach to engaging with the sector. They are often engaged as "the bad" guys, yet they are part of the solution to many of the issues being addressed.

The MTR recommends that the project develops a stakeholder engagement plan in each of its target geographies. This will include a mapping of stakeholders, their interests, motivations and the approaches for engagement. This will enable the project to identify potential allies, gate keepers, and other stakeholders that can impact the future of the project. Linked to recommendation 4 for instance, these could include donors, technical and other financial partners that can support ongoing livelihoods initiatives and others. This would also fit into the project's exit strategy proposed as part of recommendation 8.

Responsibility: ClientEarth and Partners

Duration: Within 6 months

Recommendation 4: Enhance responsiveness and alignment to emerging issues and relevant related ongoing forest governance, biodiversity conservation and climate processes in target countries.

The MTR finds that the project has been implemented with limited linkages with other ongoing relevant forest governance, biodiversity, land use planning, and climate processes in target countries and geographies. Community forests represent spaces where all these issues interact and intersect and consequently the project stands to benefit from engaging with these processes, not only to advocate for community forestry but also to share best practices and create alliances. Furthermore, there are emerging issues which have direct implications on forests and IPLC rights such as carbon markets, where the project's legal expertise could be highly valuable to help partners and national stakeholders to navigate and respond to the issues.

The MTR recommends a rapid assessment of ongoing and emerging opportunities in target countries and identify options and opportunities for engagement. From the evaluation concerns about carbon markets, mining, land use planning, Central African Forest Initiative (CAFI) processes, the National Determined Contributions (NDC), Post 2022 biodiversity frameworks were identified. The MTR understands that budgets are limited and as such, a limited number of initiatives can be identified and resources and time allocated to engage in those processes.

Responsibility: ClientEarth and Partners

Duration: Within 6 months

Livelihoods

Recommendation 5: Strengthen livelihoods support to communities to maintain their motivation, engagement and commitment towards inclusive forest governance and biodiversity conservation.

MTR interviews highlighted the need to work with communities and help women and men improve their livelihoods and/or develop alternative, sustainable options if they are to give time to forest governance. *“We cannot ask communities to conserve their forests if they cannot meet their basic needs” (key informant interview).*

- It is recommended that the project explores ways in which funding and support could be provided to communities, for examples through consultancy or better placed partners to work with communities, understanding the needs and the way forwards, which could include setting up cooperatives and other livelihoods options.
- Focus on market access is critical to ensure that as communities develop alternative income pathways, there are markets for their products for them to maintain motivation, engagement and commitment to reducing their own pressures on forests and biodiversity.

Responsibility: ClientEarth and Partners

Duration: On-going

EUDR Implementation

Recommendation 6: Maintain the multistakeholder focus on supporting EUDR implementation at EU and country levels.

CE has been highly successful in its work with partners on the EUDR. There remains significant need for its expertise and experience during implementation. There is less clarity amongst INGOs on what form and what specific actions need to be taken, regarding the preparatory and implementation phase of the regulation. There are calls for CE to play a convening and leadership role that it demonstrated during the preparation of this regulation.

The MTR recommends the following:

- Focus on strengthening existing relationships within the Brussels-based NGO coalition and building new relationships with national NGOs in strategic EU Member States as well as with civil society networks, and stakeholders in key producer countries not only to generate evidence on the implications of the EUDR on producer countries, but also on what capacity building and preparatory actions are needed.
- Further engage with Member States on the establishment and resourcing of their competent authorities.
- Conduct a rapid capacity needs assessment of key stakeholders in target countries and geographies, to ensure that its awareness raising and capacity building interventions respond to the real needs (towards achieving output 4.2 indicators).

Responsibility: ClientEarth and Partners

Duration: On-going

Monitoring, evaluation and learning

Recommendation 7: Update the project results framework to monitor, document and report on progress and achievements at the outcome level and emphasise learning.

The MTR noted that the current results framework indicators are all quantitative from output to outcome levels. While the funding proposal identified the need to track KAP, participation, leadership and empowerment changes, the current framework does not allow these changes to be reported. This limits the ability of the project to demonstrate its real impact on the ground. Enhancing the results framework will also facilitate the final evaluation of the project, providing the evidence required to demonstrate the full scope of the project's achievements.

The MTR recommends tracking more change-related indicators at output and outcome levels. This should also include process or qualitative indicators. The project should also ensure that relevant indicators are gender disaggregated and measures put in place to track progress over the last two years of the project.

The project is generating a significant number of learning materials, guidelines, templates, reports and stories of change in target geographies. The MTR recommends that the project team should carry out a mapping of products and materials developed and explore ways of making these materials available and accessible to partners. Additionally, facilitate opportunities for cross country learning and exchange of best practices. This will contribute to enhance the sustainability of the action in line with recommendation 8 below.

Responsibility: ClientEarth
Duration: Within 6 months

Sustainability

Recommendation 8: Develop an exit strategy to land the gains achieved and strengthen ownership and sustainability

The MTR proposed that the project develops an exit strategy for this phase of the programme building specific to each country context. CE needs to start discussions with partners to consolidate the achievements of the programme at all levels. The exit strategy and related discussions will also help to prepare partners for a scenario with or without future programme funding. Part of this process could include organising and providing training on resource mobilisation and funding proposal development for tropical country partners.

Responsibility: ClientEarth
Duration: Within 1 year

For Norad

Recommendation 9: Create a framework for project grantees to share experiences and knowledge.

The MTR revealed that there was mixed knowledge and understanding of other projects funded by Norad in the target implementation geographies. While it can be argued that grantees should proactively find out about other interventions in their spheres of intervention, the donor can also facilitate the process and create opportunities for learning and exchange for grantees and partners.

The MTR recommends that Norad's civil society programme could organise an annual/periodic event of its grantees during which project grantees can share results and exchange best practices. These

events could also be utilised to provide feedback to the donor and help shape future programme agendas.

Recommendation 10: Funding for phase 2 of the project

We strongly recommend that Norad continues its funding support for the programme beyond the current phase, addressing a wide spectrum of critical global challenges including climate change, deforestation, biodiversity loss, gender inequality, and the protection of Indigenous people" rights. This funding is indispensable in enhancing the voices of Indigenous Peoples and Local Communities (IPLCs) while improving their livelihoods. The programme serves as a powerful tool for indigenous peoples and local communities, addressing issues that are central to their well-being and rights and that are key in addressing the climate, water and biodiversity crises. It not only empowers IPLCs but also ensures their active participation in decision-making processes that affect their lives. This is crucial for achieving meaningful outcomes in areas like inclusive and sustainable forest governance, biodiversity conservation, gender equality, climate change.

The unique legal capacity-strengthening approach adopted by the current consortium means that it is exceptionally well-positioned to lead this process effectively. It has already achieved significant milestones and demonstrated its capacity to respond to emerging needs. By continuing to support this initiative, Norad can facilitate the consolidation of these achievements and enable the consortium to take a leadership role in addressing global challenges comprehensively, promoting the voice and livelihoods of indigenous peoples and local communities and supporting the Norwegian government to deliver on its national and international climate goals.

Responsibility: Norad

Duration: Post 2025

1 Introduction

1.1 Background to the Project

The *'Building legal foundations for sustainable forests and livelihoods'* five-year project (2021-2025) seeks to combat deforestation, focussing both on supply-side forest governance reform and demand-side forest commodity supply chain reform. The first objective is to improve and promote community forestry as a tool to enhance forest management and governance, reduce deforestation, conserve biodiversity and generate sustainable development, focussing on Liberia (Outcome 1), Republic of Congo (Outcome 2) and Gabon (Outcome 3). The second objective is to promote, and shape import commodity regulations focusing on two of the largest importing markets, the EU (Outcome 4) and China (Outcome 5).

The theory of change is based on tackling related problems in both producer and importing countries and including relevant incentive structures and institutions. Each is a distinct aspect of the challenge of reversing the loss of tropical forests. By addressing each in a coordinated manner the project can demonstrate both specific results and cumulative impact of informed, coordinated effort. Project activities focus on legal analysis, training, advocacy and support on legal concepts. The programme is careful to work with and through trusted partners with proven track records in its spheres of intervention to ensure that its actions are locally owned, suited to local context, and that relationships with key stakeholders are properly nurtured and sustained. The project target groups are local communities and Indigenous Peoples in Liberia, the Republic of Congo and Gabon, and government decision-makers in the EU and China.

The programme is funded by the Norwegian Agency for Development Cooperation (Norad) under Norway's International Climate and Forest Initiative (NICFI). NICFI's overall goal is to contribute to the reduction and reversal of tropical forest loss to enable a stable climate, preserved biodiversity and sustainable development. Results-based, predictable and adequate funding streams is the main tool for reducing emissions from deforestation and forest degradation. The intention is to change the economic logic in favour of the global climate and the forests. All these efforts should promote sustainable development and the reduction of poverty.

1.2 Purpose and Objectives of the Review

The purpose of this mid-term review was to gain insight into progress of ClientEarth's NICFI project towards achieving our desired results. As the mid-way point of the project, it provides an opportunity to reflect on whether the methodology and approach remains appropriate and effective in delivering the project aims. It is intended to inform ClientEarth's planning for Year 4 and 5, including answering key questions such as: *"Are we getting where we want to go"* and *"How can we redesign some of our activities to fit emerging issues?"*. It will also help ClientEarth to identify any needed changes in the working of the partnership.

1.3 Scope of the evaluation

The MTR covered the period between July 2021 and December 2023. In terms of thematic and geographic focus, the MTR team assessed progress against outcomes 1, 3 and 4 in Liberia, Gabon, and the EU respectively.

Outcome 1: Liberia

Community forests are stronger and contribute more effectively to reducing deforestation, conserving biodiversity and generating sustainable economic development in Liberia.

- Output 1.1: Improved capacity of forest communities to integrate best practice regarding: Sustainability, Alternative livelihoods, Gender, and Biodiversity.
- Output 1.2: Increased capacity of forest communities to resolve conflicts and overcome hurdles to effectively manage their community forests.

Outcome 3: Gabon

A strengthened legal regime promotes community forestry and IPLC rights in Gabon.

- Output 3.1: Increased participation from civil society in legislative (and implementation) processes linked to community forestry.
- Output 3.2: Improved capacity of forest communities to manage their community forests in line with the law.

Outcome 4: EU

The effective implementation of a newly adopted EU law to minimize the risk of putting products on the EU market associated with deforestation. In particular, provisions related to:

- 1) Transparency of supply chain
 - 2) Complaint mechanisms for CSOs
- Output 4.1: Increased understanding and capacity of primary stakeholders to use the new EU law to minimize the risk of putting products on the EU market associated with deforestation (government officials, private sector, and CSOs)

The MTR analysed project progress against effectiveness and coherence criteria in line with the MTR terms of reference. Box 1 shows the criteria the related sub-questions.

Review questions

Coherence – synergies with other interventions

- Internal coherence: To what extent does the grant recipient work with or in coordination with other initiatives funded by NICFI? What are the learning points?
- External coherence: To what degree does the grant recipient seek to create alliances and foster synergies with civil society organisations and other partners, national or international, to ensure harmonisation of interventions in the given contexts?

Effectiveness – assessment of project progress

- To what extent is the agreement successful in achieving desired results? Please provide a separate assessment according to each project-level outcome found in the results framework.
- In terms of internal, project adjustments, if any, what concrete recommendations do you propose to the organisation for the remainder of the project cycle?

Specific Questions I – contribution to NICFI Outcomes

- Outcome 1: How does the agreement contribute to protecting tropical forests and other carbon sequestration ecosystems through regulation, legislation, and area management?
- Outcome 2: How does the agreement lead to the protection of the forest and land rights of IPLCs. To what degree does the agreement contribute to integrating sustainable forest use by IPLCs into legal frameworks, area plans, and development strategies? How does the agreement strengthen IPLC capacities for sustainable management and livelihood activities? Please provide concrete examples where applicable.
- Outcome 4: How does the agreement contribute to the adoption or implementation of legal frameworks, regulations or other initiatives that affect the market of raw materials/ commodities with a view to reducing deforestation? Please provide concrete examples of how such instruments have affected the market.

Specific Questions II – contribution to NICFI Areas of Strategic Interest

- How does the agreement spur or employ innovative working methods, context analyses, partnership models, or similar innovations? Please elaborate.
- What are the impacts of the agreement, positive or negative, on women and gender equality? What are the lessons learned?

2. Methodology

The MTR was undertaken using a mixed method approach in order to balance quantitative data with qualitative information to deepen understanding, generate insights, and locate the review in the realities of the various stakeholders. It was undertaken over three phases: (i) Inception phase, (ii) data collection and analysis phase and (iii) close out phase.

2.1 Phases of the MTR

Inception Phase

This phase provided an opportunity for the consultant and ClientEarth to gain a common understanding and agree the methodology, timelines, key stakeholders, clarify objectives and scope of the assignments. For output 1.2 and 3.2 in Liberia and Gabon, the consultant was also provided access to data from a survey of civil society organisations involved in the “Legal Working Groups” supported by ClientEarth. Following initial documentary review, an inception report was drafted, which included the data collection tools, and an evaluation matrix and timeline for implementation. The field visit sites as well as the list of stakeholders to be involved was also agreed.

Data collection and analysis phase

This phase represented the core of the assignment. Data collection comprised secondary data analysis, based on programme documentation, and primary data collection and analysis, which included interviews with key informants, focus group discussions and visits to target communities. The evaluation began with a systematic review and analysis of key project documents, including the proposal, baseline evaluation, yearly reports, quarterly MEL reports, and activity reports. This generated valuable insights into the project's background, progress, and alignment with intended outcomes.

Online interviews with key stakeholders and staff in Europe and the UK were conducted to ensure that the voices of wider stakeholders were taken into consideration. The semi-structured interviews enabled the consultant to gather qualitative insights, perspectives, and experiences related to the project's effectiveness and coherence. In addition, focus group discussions were held with several community members in order to understand the effect of the project on the lived realities of forest-dependent women and men in Gabon and Liberia. National level face-to-face interviews were also conducted with staff from project implementing partners and other external stakeholders. These were led by national consultants contracted by ClientEarth, with the supervision of the international consultant. 162 participants took part in the evaluation as shown in tables 1, 2 and 3.

Table 1: Distribution of MTR participants – Liberia

Participants	Male	Female	Total
Barconni community	12	12	24
Zuzhon community	16	6	22
Korninga B community	16	9	25
Bondi Mandingo community	14	7	21
Liberia partners	5	3	8
Total	63	37	100

Table 2: Distribution of MTR Participants— Gabon

Participants	Male	Female	Total
Ebea-Ngomessie	12	13	25
Mbelalene	5	5	10
Sakeville	8	2	10

Gabon partners and key informants	10	4	14
Total	35	24	54

Table 3: Distribution of MTR participants— EU and UK

Participants	Male	Female	Total
CE staff and key informants	3	5	8
Total	3	5	8

In terms of gender distribution, 41% of participants were female compared to 59% male. We obtained quantitative data from the project's results framework. This consisted of the project team's quantitative assessment of progress towards the project's indicators and yearly targets.

Data analysis was undertaken using thematic analysis and triangulation techniques. Qualitative data from interviews and open-ended survey questions was categorized, and thematically analysed in line with the evaluation criteria and sub-questions. Quantitative data was analysed using Excel and consisted of calculating the rate of achievement of project targets. While data was triangulated by cross-referencing different data sources to enhance the credibility and validity of the findings, the unique perspectives and experiences of different stakeholders were also collected and employed to enrich findings and future learning. This comprehensive approach ensures a holistic understanding of the project's impact, corroborating insights from multiple perspectives.

Close-out Phase

An interim draft report based on the agreed template was provided in English. Comments from the draft report were addressed and revised. This final, comprehensive report has incorporated feedback and synthesized the findings and providing actionable recommendations. The report follows the outline proposed by ClientEarth consisting of an executive summary and a main body, covering the project's background, purpose, methodology, findings, conclusions, and recommendations.

2.2 Dealing with bias

In the Mid-Term Review (MTR), addressing potential biases in diverse methodologies was essential for ensuring accurate and credible findings. A significant challenge was the risk of selection bias in participant-driven methods like interviews and focus groups. To mitigate this, a broad sample of stakeholders was included, capturing diverse perspectives and preventing any single viewpoint from dominating. Additionally, the risk of confirmation and interviewer biases was addressed through a mixed-methods approach, allowing for triangulation of data from various sources. This cross-validation challenged preconceptions and considered alternative explanations. National consultants were briefed on good practice to reduce data collection bias. In qualitative data analysis, multiple levels were used to ensure balanced interpretation. National consultants provided initial findings and raw field data to the international consultant, helping to mitigate individual biases and preconceptions. Despite inherent limitations in evaluative processes, efforts were made to minimise biases through methodological design, participant selection, and data analysis. These measures aimed to enhance the reliability and validity of the evaluation, forming a solid foundation for conclusions and recommendations.

2.3 Structure of the report

The report has five chapters. The first chapter provides the background, objectives of the MTR while chapter two presented the methodology. Chapter three presents the findings. Findings are organised in line with the MTR questions. The report ends with a conclusions and recommendations chapter. The following annexes are attached to the report:

Annex 1: MTR ToRs

Annex 2: List of MTR participants

Annex 3: MTR evaluation matrix

3 Findings

3.1 Coherence: To what extent has the project interventions proven compatible with the strategies and interventions of other actors, been coordinated effectively, and managed to avoid duplication?

Evaluation Question: Did the projects take advantage and/or add value to other ongoing initiatives funded by NORAD in Liberia, Gabon, and the EU?

Finding 1: There is a varied awareness of NORAD-funded grants across regions. However, there is a general lack of coordinated planning and joint working among projects, largely due to the absence of donor-implemented or INGO-led mechanisms for collaboration.

Interviews with project staff in all project intervention areas revealed mixed knowledge and synergies with other NORAD funded grants. In Liberia and Gabon, SDI and Brainforest are also implementing partners or have established partnerships with Fern, Environmental Investigation Agency and the World Resources Institute. In Europe, a limited number of staff were aware of other NORAD funded grants. Only Fern's project was mentioned by respondents when asked about their knowledge of other initiatives. One staff mentioned, "we don't know of any Norad funded grantee" in Gabon, while another stated that "during our time, we have not had any direct coordination with NORAD grantees".

Despite the mixed knowledge of other NORAD initiatives, there was limited joint up planning and working in the project spaces of intervention. Within SDI and Brainforest, separate teams work on NORAD-funded grants led by the above-mentioned international NGOs. Information sharing happens within teams, but there has not been joint planning and coordination in the rollout of field activities, mainly due to projects not targeting the same communities, geographies, and activities. In Europe, ClientEarth's teams interact with the above-mentioned organisations, but this is not specific to NORAD funded activities. For instance, CE collaboration with Global Witness or Fern during the implementation of the EUDR was highly commended, though not expressly done because of the source of funding.

It appears that the need for coordination is more of an aspiration of the donor. There are no mechanisms instituted by the donor to facilitate awareness and coordination between projects funded in similar geographies. It is up to project partners to create awareness about their interventions and to find spaces for collaboration. So far, none of the mentioned international or national partners has taken steps to facilitate or coordinate joint working. Actions by partners have been on an ad hoc basis.

Evaluation question: To what extent are national partners and ClientEarth in Liberia, Gabon and in Europe working with other actors nationally, regionally, and internationally in pursuing the outcomes of this project?

Liberia

Finding 2: The collaborative efforts of ClientEarth partners in Liberia have effectively engaged a range of governmental and civil society actors, focusing on empowering communities and addressing their rights. However, these efforts have been more opportunistic than structured due to the absence of a documented stakeholder strategy, with limited direct actions aimed at altering private sector behaviours towards communities.

ClientEarth (CE) has forged partnerships with the Forest Communities Initiative (FCI), Sustainable Development Initiative (SDI), Heritage Partners & Associates (HPA), and the National Union for Community Forest Management Bodies (NUCFMB). These collaborations have been instrumental in delivering training and support to forest communities, addressing specific challenges faced by these communities, and

promoting adherence to legal frameworks governing community forests. Both nationally and internationally, CE and its partners have shown significant engagement in advancing the project's objectives.

At the national level, the project commenced with a significant event on August 17, 2021, in Monrovia. This launch workshop was attended by important stakeholders, including representatives from the Forest Development Authority (FDA) and the Ministry of Internal Affairs. The workshop was an opportunity for participants to gain comprehensive insights into the project activities, expected outcomes, and impacts, as outlined in the 2021 Progress Report.

In a two-day consortium meeting organised by CE, HPA, and the Consortium Coordinator, key stakeholders including an Alternative Dispute Resolution trainer and mediation support consultants from the Kofi Annan Institute and the Citizens Bureau, collaborated to discuss the project's direction. Attendance was limited due to COVID-19, with some participants joining virtually, as reported in the HPA Y2, Q1 Quarterly Progress Report. A community radio show held on 22 November 2021 in Saclapea, Central Nimba county, disseminated information on community forest governance tools. The show, as noted in the NUCFMB Y1Q4 Quarterly Progress Report, successfully enlightened the community, and was appreciated by communities.

The Sustainable Development Institute (SDI) and Heritage Partners and Associates (HPA) have benefited from collaborations with various projects. SDI's involvement with the Forest Governance Market Climate Change project and the EU-funded Liberia Forest Sector Project (LFSP) enhanced their understanding of forest management legal frameworks and community capacity building. These partnerships provided SDI with crucial training materials and expanded their interactions with government institutions and local communities. HPA's main collaboration was with the MFGAP Project, extending their reach beyond project communities. This included organising legal working group meetings with community governance structures and government stakeholders like the FDA and the Liberia Land Authority (LLA). HPA's advisory support services in the forest sector increased their recognition and extended their institutional services across Liberia. During the project's second year, FCI, SDI, HPA, and NUCFMB intensified their efforts in community awareness and helped communities align with legal frameworks and governance best practices, as indicated in the 2022 Progress Report.

Regionally, consortium partners organised forums to educate forest communities on best practices and the community forestry legal framework. Notable was the Regional Forum in Buchanan (December 2-4, 2021), which facilitated an understanding of community needs and capacity building. A subsequent forum in December 2023 focused on forest governance transparency and accountability. Internationally, HPA and NUCFMB assisted the Soblima community in drafting governance documents and provided dispute resolution training and legal support to various communities. These activities demonstrated the collaboration between partners, communities, and national and international actors in mediation support, as reflected in Output Indicator 1.2.1.

Interviews with CE and country project staff highlighted the significance of working with the NUCFMB and the need to strengthen its role in the next phase of the intervention. As an apex organisation, key informants suggested the need to strengthen the performance of this organisation including its strategic planning and internal functioning as a key sustainability strategy of this project. For instance, one respondent mentioned that building project activities around the strategic plan of the organisation would enhance ownership of the project achievements and strengthen its ability to continue/sustain the achievements of the intervention. Another respondent captured the contributions of others, suggesting stronger involvement of the NUCFMB leaders of the network in field missions and activities. Respondents argued again that this would strengthen the legitimacy of the networks, enhance its acceptance by community forest associations and other stakeholders. So far limited actions have been undertaken directly towards private sector actors to change their behaviours towards communities.

Gabon

Finding 3: ClientEarth's partnership with Brainforest is enhancing community engagement in forest governance in Gabon by strengthening legal frameworks and facilitating engagement between communities, civil society, and government, although the absence of a strategic stakeholder engagement plan has limited the potential for more structured and impactful collaborations.

ClientEarth, in collaboration with Brainforest, is contributing to the enhancement of community forestry in Gabon. Brainforest plays a crucial role by educating communities about forestry rules and legal rights and obligations and engaging with both civil society and government officials to influence forest governance. However, ClientEarth faced challenges with the Ministry of Forest's perception of its role vis-à-vis civil society. Efforts to improve this relationship included constructive meetings with officials explaining its operations and activities. This alleviated the concerns enabling ClientEarth to continue the partnership and intervention in the country. However, it continues to remain vigilant, adapting to the political climate and conducting ongoing risk assessments to mitigate negative impacts on partners and communities, as noted in the NORAD 2021 Progress Report.

Brainforest's inclusion in the Ministry of Forest's Inclusive Working Group (IWG) for developing the National Strategy for Community Forestry has allowed it to present recommendations and voice community concerns. The collaborative effort between Brainforest and Cabinet ESSONO ONDO also enabled civil society actors through the national legal working group to input into the forest law reform process as reported in Brainforest's Quarterly Report Y2 Q1. Other efforts of the legal working group included national level discussions on benefit sharing rights in the mining and hydrocarbon sectors as well as the European Union Deforestation Regulation. Facilitated by CEO-SE, the meeting saw participation from various local organisations, including Brainforest, Muyissi Environnement, Keva Initiative, and ClientEarth. This gathering, as mentioned in Brainforest's Quarterly Report Y3 Q2, was a significant step in fostering broader engagement and understanding of these critical sectors. A comprehensive study has been published (available [here](#) in French only) in November 2023, with a unique model of contract to be proposed to the relevant ministries in 2024.

At regional level, at the 1st Meeting of Parties of the Congo Basin Forest Partnership, the progress made in community forestry in Gabon and the Congo Basin was presented by the national project team (accompanied by a gender expert consultant) to a regional and international audience. This meeting was an important platform for showcasing the advancements in the region by Brainforest.

EU

Finding 4: ClientEarth has effectively influenced EU legislation, through engagement with civil society and government actors. However, the approach lacks a strategic framework and has limited involvement with private sector stakeholders.

CE's efforts and engagement with other stakeholders have been multi-faceted and influential. Starting in 2021, CE submitted a comprehensive document to the European Commission, which played a critical role in shaping the draft proposal for the new regulation on deforestation-free products. Other subsequent efforts included policy contributions, where CE actively participated in the Amsterdam Declaration Partnership's multi-stakeholder meetings as highlighted in the NORAD 2022 Progress Report. CE's presence was also notable at international conferences, such as the World Customs Organisation conference. In this forum, they emphasized the importance of strong enforcement frameworks in EU legislation related to deforestation. This discussion was part of the broader initiative on the new EU Framework for Forest Monitoring and Strategic Plans, as reported in November 2022.

CE's interventions extended to networking and advocacy activities throughout 2022. These efforts were instrumental in moving towards an agreement on a robust legal text for an EU law aimed at minimizing the risk of deforestation-linked products entering the EU market. The advocacy work was informed by evidence

from studies commissioned by CE. These studies supported advocacy for a comprehensive product scope in the EU law and guided CE's engagement with EU Member States on the implementation and enforcement of the EUDR. CE also engaged in legislative consultations, notably with members of the EU Parliament during the July plenary week in Strasbourg. These discussions were crucial in refining the EU Proposal and ensuring its strong elements were preserved. CE's legal advice in these consultations was pivotal, as detailed in the EU Forest Work Report 2023.

To influence the collective position of Member States, CE collaborated with Brussels-based NGOs, targeting Member State representatives, and coordinating with national NGO partners to support their advocacy. For instance, CE met with NGOs in Ghana and Cote d'Ivoire to build awareness of the EUDR. They also organized a workshop in Kuala Lumpur with Malaysian and Indonesian civil society in 2022. In Gabon and Liberia, awareness-raising events were organized for national stakeholders to increase their understanding of the new EUDR texts and to enable national actors to explore opportunities for leveraging the regulation for national law enforcement efforts. In Europe, CE's partnerships included collaboration with organisations like Conservation International, Environmental Investigation Agency, Fern, Forest Peoples Programme, Global Witness, WWF, Greenpeace, and Wildlife Conservation Society. Through these comprehensive and strategic efforts, CE has significantly contributed to advancing environmental legislation and fostering a global dialogue on forest conservation and the rights of IPLCs.

It is important to highlight that the work in Liberia, Gabon and the EU for the most part focused on engagements with civil society, government actors and law makers. Engagement with private sector actors has been highly limited in any of the project implementation geographies. Stakeholder engagement has for the most part been adhoc. It has not been driven by strategic analysis, nor targeted with clearly formulated objectives.

Evaluation question: What was the value added by ClientEarth?

Finding 5: ClientEarth's added value in Liberia, Gabon, and Europe centered on enhancing legal capacity and frameworks, governance practices, and the EUDR. Through tailored training, effective collaboration, and strategic advocacy, the organisation significantly empowered local civil society partners, influenced policymaking, and promoted transparency and inclusivity in the EUDR.

In Liberia, CE role has been pivotal in enhancing national capacity building and legal support. CE organised a training of trainers workshop targeting staff from each Liberian project partner and the Consortium Coordinator, focusing on enhancing understanding of legal frameworks and community forest governance. The importance of this training is highlighted by the various project partner's active involvement and the positive feedback they provided during the MTR. Respondents reported how this training enhanced their appreciation of legal tools and their application in their community engagement work.

Partners also value the convening role of CE, enabling it to steer the consortium while leveraging the expertise and experience of each partner organisation. Local partner staff state that CE facilitated effective collaboration among project partners, organizing sessions that enabled them to share updates, discuss challenges, and strategize for better outcomes. This collaborative approach is reflected in the partner's appreciation for the opportunities to align their objectives and work cohesively. CE's support in drafting a constitution and by-laws template for community forests is another critical contribution, ensuring uniformity and clarity in community-level governance practices. Additionally, the Women's Charter, developed with inputs from CE, stands as a testament to their commitment to inclusive governance. Community members expressed high appreciation for CE's capacity-building support. Their feedback particularly emphasized the benefits in understanding legal rights, the importance of women's inclusion, and the effectiveness of forest governance structures.

In Gabon, ClientEarth has had an essential role in including a strong gender mainstreaming component to the implementation of the project. More precisely, ClientEarth has helped develop a long-term gender strategy aiming at strengthening the capacity of communities, civil society and the administration alike. With respect

to communities' understanding and implementation on gender-sensitive forest management practices, the gender strategy translates into year-long gender training reinforcement aimed at communities, focusing on practical aspects of women's involvement in forest governance practices, overcoming barriers to participation and leadership. ClientEarth also helped build a strong link between Brainforest and a reputable gender consultant, the latter accompanying Brainforest and the communities in quarterly activities involving monitoring and evaluation to better reassess the needs in terms of gender and adapt the work programme. For example, according to Brainforest's Y3Q3 report, an activity carried out in two pilot communities to promote the collection, transformation and selling of NTFPs on the local market had resulted in a community-wide participation (with women obtaining revenues from selling their products on the local market). This will be accompanied by support to communities to create their own cooperatives/associations for the commercialisation of transformed NTFPs and reduce reliance on logging. Moreover, ClientEarth focuses on the proper understanding and assimilation of legal provisions related to gender mainstreaming. To this end, a continuous training plan was developed together with Brainforest and the gender consultant where legal provisions are explained so that communities can understand their rights and responsibilities. This is aiming to support inclusive and participatory forest governance at community-level.

With respect to the understanding and implementation of gender-sensitive forest management practices at the level of the civil society and the administration, ClientEarth has played a central role in bringing the topic to the table. A two-day workshop organised in Y2Q2 brought together both stakeholders to discuss the inclusion of gender in forest-related policies. The workshop, organised within the framework of the LWG, was very well received but also revealed a general lack of awareness around the topic, especially on the part of the forest administration. As a result, the administration requested for enhanced training and collaboration with civil society to upgrade existing policies and initiatives. The outreach of these activities also shows the importance of ClientEarth's initiative, that is, the creation of and continued support to the LWG. This is an essential tool to enhance the visibility and impact of forest governance work and to assist CSOs to push for inclusive forest governance reforms and provide meaningful contributions to their advocacy work. The LWG thus ensures the engagement with a wide range of stakeholders and motivates civil society to bring concrete advocacy initiatives.

The project's interventions have added significant value to the implementation of the government's sustainable forest management initiatives. ClientEarth's intervention in Gabon, is the only initiative which specifically supports legal capacity strengthening of communities, enabling them to deliver on local development plans. As the president of Ngomessi community forest said, *for all activities implemented within the framework of community forests, it is important to respect the legal obligations while ensuring that the interventions are aligned with the local development plans*. The project supports communities to deliver on these local development plans drawing on community forestry as a lever for local development.

Respondents highlight that the deployment of two legal and/or technical assistants in their communities has been highly valuable, enabling them to access support and advice which they would otherwise not have access to. This is particularly so because local government officials and authorities have limited presence in communities, and so communities are left to themselves to deal with their forest governance challenges. Community representatives appreciated the contributions of these assistants in supporting community mobilisation, capacity building and mediation efforts to address conflicts in the management of community forest associations and relationships with private sector actors in the communities. Leaders of community forestry associations valued the legal guidance provided and the organisational development support received which was contributing to more transparency in the management of community resources.

In Europe, ClientEarth's influence on legislative processes and advocacy is evident. Their leading role in shaping NGO coalition positions and engaging with the European Commission is highlighted by their active participation in discussions and policy formulations during the drafting and validation of the EUDR. Key informants highlighted that CE's comparative advantages in their intervention rested in strong established linkages with the commission, its legal experience and knowledge of international/EU focused regulations. One respondent mentioned that CE's ability to work at the nexus of forests and human rights contributed to its ability to support the NGO coalition in the collective advocacy efforts. One staff member said, *"our role in this coalition has been seen as the trusted legal advisors, providing text, feedback on the text, translate the*

aspiration of civil society on the text, supporting parliamentarians and officials to propose texts. ...we had the good reputation and direct links to decision makers – ours was more of technical advisory role and sometimes in the background”.

Another key informant confirmed the need for the legal expertise provided by CE throughout the EUDR process, acknowledging that though there was broad expertise and experience within the coalition, the process required state-of-the-art legal knowledge and expertise to be effective and influential when dealing with EU officials and decision-makers. Consequently, *“legal finesse was necessary to have lawyers ...to check them and ensure that they were legally sound. It is very well appreciated; we couldn’t have done it without them – they are good and diligent with what they do and this is appreciated”*. Another area of value was CE’s convening power and mediation role. Respondents in the MTR acknowledged that the positions within the NGO coalition were not always aligned. There was need for consensus and disagreement to be managed so as to sustain the collective actions and goals. It appears from the interviews that the focus of CE on the legal aspects of the regulations enabled it to position itself strategically and to build the trust of other organisations. The organisation's efforts in advocating for international human rights and the rights of Indigenous Peoples were significant through publishing a [briefing](#) paper Global Witness these could be integrated into the proposed product-based due diligence requirements (Norad 2021 Progress Report). CE continued to demonstrate its expertise in its contributions to the UK government’s consultations on ‘Implementing due diligence on forest risk commodities’ to inform the Government’s development of secondary legislation¹.

3.2 Effectiveness: To what extent is the project on track or likely to achieve its outputs

This section focuses on the extent to which the project objectives were achieved or are on track to be achieved. It also addresses contributing factors and the challenges encountered along the way. It starts with an assessment of progress towards outputs in target geographies, followed by the performance factors and concludes with an analysis of the project outcomes.

*To what extent has the response/project achieved its stated outputs in **Liberia***

PROJECT OUTCOME 1: Legal framework on community forests effectively implemented and enforced

Figure 1 shows the level of progress against targets for Liberia. The figure shows that at midterm, the project has achieved 67% of outcome midterm targets, but is at 25% regarding the end of project targets. At the early stages of the Norad programme (Year 1), all partners and CE reviewed the results framework to ensure targets were feasible and appropriate. Partners made a decision to focus on fewer communities to amplify impact and work with communities in a meaningful way. The high targets in Y5 were drafted at the proposal stage on the assumption that the UK government’s Forest Governance Markets and Climate work would provide match funding but this has not materialised. At the time of the MTR, there were ongoing discussions with the donor to revise the targets down.

¹ clientearth_responses_to_defra_consultation_on_forest_risk_commodities_-_march_2022.pdf

Level of progress towards targets

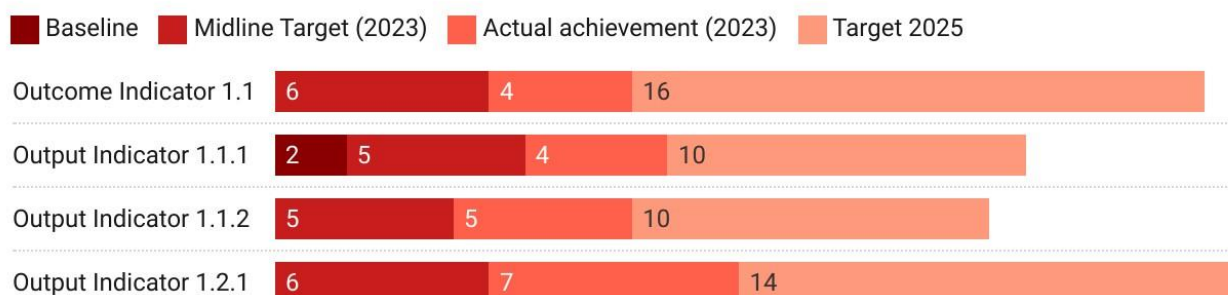


Chart: ACE D&H Consultants Ltd • Source: ClientEarth January 2024 Updated Results Framework • Created with Datawrapper

Figure 1: Level of progress towards outcome 1 targets

Regarding the two project outputs, figure 1 shows that output 1 and 2 output targets are either on track, been achieved or have been exceeded. At mid-term, end of project targets are on track to be achieved.

Output 1: Forest communities have the knowledge to promote best practice on implementation and enforcement of the community forest legal framework

Finding 6: The project enhanced forest community capacities in sustainability, alternative livelihoods, gender inclusion, and biodiversity, through legal, governance and governance training, while the development of equitable contract templates and constitution standards by ClientEarth and partners empowered communities in forest resource management and negotiations. However, there is a need for improved outcome measurement and direct livelihoods support to maximize training effectiveness.

Table 4 shows that the project is on track to achieve its mid-term targets. Various capacity-strengthening events were implemented to equip communities with the skills and tools required to implement the community forest legal frameworks. To assess the state of capacities at the beginning of the intervention, project partners implemented scoping missions in eight target communities of the project. Following this baseline, partners delivered eight community trainings on legal governance tools and gender mainstreaming. Legal training, provided by SDI and HPA, was instrumental in educating community members on the Community Right Law (CRL), forest-related laws, Alternative Dispute Resolution (ADR), and other legal instruments. These sessions, such as one in Totoquilla Town in 2022, were particularly impactful. Marie Sumo, a female youth from Bondi Mandingo, expressed how this was the first time she actively learned about forest governance in a meeting. This training empowered communities, equipping them with the knowledge to effectively handle legal issues, including disputes with companies like Indo Africa.

In addition to legal training, three communities benefited from training on community forest governance structures, focusing on the roles and responsibilities of each officeholder. Financial management training by SDI also played a crucial role, improving community management of forest funds, planning, and budgeting to address financial governance challenges. Training of Trainers (ToT) for the NUCFMB and Community Forest Management Bodies (CFMBs) was another key area. Facilitated by HPA, these sessions covered the legal framework for community forests, community forest governance structure, and the amendment/revision of authorized forest community constitutions & by-laws.

Additionally, HPA and NUCFM's involvement in training on the draft constitution was significant. The development of a Women's Charter by FCI was a crucial step towards gender inclusivity. The Women's Training on Gender Mainstreaming in Community Forest Management focused on the Community Rights Law and gender requirements. The results were evident in Zuzohn Community Forest, where women's engagement in forestry discussions and leadership roles within governance bodies saw a noticeable increase.

The capacity building efforts of the project were appreciated by one female respondent saying *“the first time I ever sit and talk in meeting and learn something on forest was during a training in Totoquilla Town in 2022”*.

Alternative livelihood training events helped community members generate income through activities like mushroom growing, beekeeping, and small-scale fishing. Training for women on community forest management, farming cassava, potatoes, and peanuts was also impactful. A Community Assembly member from Zuzhon, shared how this training enabled women to support their families and reduce dependency on forest resources. *“SDI train us to make small farms on cassava, potatoes to help our husbands and don’t depend on the forest alone”*. Communities argue that while training is beneficial, it can be more impactful when accompanied by direct support in activities that alleviate their pressures on the forest. There is a recognition that even if support to livelihoods was not articulated as part of the project’s theory of change, it represents a critical option to achieve sustainable forest management goals. One key informant said *“we cannot ask communities to conserve their forests if they cannot meet their basic needs. This is missing in our ToC, we need people to meet their basic needs and to be able to protect their forests, providing livelihoods support. it’s a big piece that is missing in the project.”* Another respondent concurred by suggesting that *“there is need to combine with the legal work. CE’s role is one more of leveraging and linking partners to funding and support.”*

These views suggest that CE could play a role in resource mobilisation in support of community livelihoods as part of its traditional legal capacity support. These livelihoods support initiatives would be best delivered by consortium partners with the relevant expertise and experience. Alternatively, as the respondent suggests, CE could also play a role in creating stronger linkages with other ongoing initiatives in the country which support community forest management. There is a role for CE to play, which is to ensure that local development plans reflect these realities and ensuring that they are gender sensitive. This will ensure that women’s needs, and economic activities are mainstreamed. The MTR notes that the national project teams stand to benefit from stronger monitoring of outcomes emerging from the various trainings and experience sharing events organised. Obviously, the results framework by focusing on quantitative indicators does not demand this higher level of analysis and reporting, but it should allow the project to document change throughout the project implementation.

Finding 7: The project addressed challenges in implementing the community forest law framework, hindered by timber companies’ non-compliance, by developing equitable Commercial Use Contract templates and standard constitution guidelines. These tools, crafted to align with forest laws and enhance contract negotiations, have empowered communities like Bluyeama, Marbo, and Bloquia, leading to stronger governance structures with integrated sustainability, gender, and biodiversity.

The implementation of the community forest law framework has been significantly hindered by the practices of many timber companies. These companies often operate with a disregard for the law, illustrated by their failure to pay fees to communities, logging in unauthorized areas, and not fulfilling promises to deliver community infrastructure. These issues frequently arise but remain unresolved. Under Section 6.2 of the Community Right Law (CRL), communities are entitled to enter into Commercial Use Contracts (CUCs) with third parties for harvesting forest products on Community Forest Lands. However, many of these contracts are drafted in a manner that place communities at a disadvantage. Common issues include low cubic meter fees, unsustainable timber harvesting, the exclusion of community development provisions, and dispute resolution clauses that are often cumbersome and ineffective. Such poorly drafted contracts prevent communities from reaping the benefits of their forest resources.

To counteract this, ClientEarth and HPA developed a CUC Template for medium-scale operations, covering areas between 5,000ha and 49,999ha (MS CUC). This template, drafted in 2019 as part of ClientEarth’s Forests Governance, Markets and Climate (FGMC) grant from the UK Government, aims to ensure more equitable agreements that comply with forest laws and allow communities to benefit from timber harvesting.

The MS CUC Template incorporates vital provisions of the community forest legal framework previously overlooked or minimized in logging agreements. It includes legal references for each term, empowering communities in contract negotiations and enhancing the implementation and awareness of the community forestry legal framework.

The project supported three communities (Bluyeama, Marbo and Bloquia) in their negotiations regarding new contracts with timber companies in 2021. The communities based their draft agreements on the Medium-Scale (MS) Commercial Use Contract (CUC) Template produced by the CE in 2019. The project did not receive requests for support regarding the negotiation of forest-use contracts in Year 2, as many communities had third-party agreements (Progress Report, Reporting Year 2022). Other institutional capacity building initiatives were initiated by the project partner HPA. The organisation developed a standard template for community forest constitutions aligning with the Community Rights Law, 2009, and its regulations. HPA and NUCFMB supported Soblima, a newly established Authorised Community Forest, to draft a constitution and bylaws to ensure the implementation of strong governance and to integrate sustainability, gender and biodiversity considerations. The Blei Community also received training on constitutions and bylaws. Training focused on the benefits of including provisions regarding conservation, alternative livelihoods, and ensuring women's inclusion in forest governance bodies and how to draft constitutions which facilitate prevention and resolution of disputes.

Finding 8: The project enhanced the capacity of forest communities to use legal tools for dispute resolution, evidenced by mediation in conflicts with timber companies and increased community understanding of forestry laws through comprehensive training programs and innovative tools like the TIMBY app and community radio programmes.

Project Output 1.2 focuses on enhancing communities' abilities to use legal methods for resolving conflicts in community forests, vital for enforcing laws and efficient forest management. It addresses the issue of timber companies often not honouring agreements with communities. Significant progress includes assisting Korninga "B" Community Forest Management Board (CFMB) in a dispute with Indo-African Plantation Inc over unpaid fees. HP's mediation led to IndoAfrica agreeing to pay arrears according to a Memorandum of Understanding. HPA also provided dispute resolution training and legal support to the Tartweh Drapoh community and helped the Blei Community with a boundary dispute.

Capacity-building and training activities have been implemented to improve community forest governance and dispute resolution skills. SDI organized a Regional Forum where HPA conducted training sessions on Alternative Dispute Resolution (ADR), Community Forest Governance, and relevant laws. Additionally, a virtual Training of Trainers (ToT) workshop was held, focusing on forestry laws and regulations awareness. HPA organized meetings for community forest governance issues, including contract legality and unauthorized logging. SDI conducted a 3-day legal training session for three Authorized Forest Communities, covering ADR and governance structures. NUCFMB held community-level meetings in the Blei Community Forest, with HPA presenting on ADR and governance.

In 2023, HPA addressed persistent complaints in the Boe & Quilla Community Forest, aiming to improve community relations. Another project aspect was training on the TIMBY app by SDI, enabling communities to report forest violations effectively. The project also supported a radio program to raise awareness about forest governance and developed commercial use contracts, providing communities with tools for forest management and dispute settlement. For instance, in Grand Bassa County, community members used their legal knowledge to engage in a land dispute with a family, scheduling a conference to resolve the conflict. This multifaceted approach has equipped communities with knowledge and tools for effective forest governance and dispute resolution. In another example in Gbarpolu County, HPA developed the commercial use contract for a community, and this helped them to settle a dispute related to a social agreement with a company in 2022. Communities also reported how they used their TIMBY phones to report a range of violations, including those of mining companies in their community forests, as one community member explained: *"We use the TIMBY phones given by SDI to report the violations of Bea Mountain in our forest"*.

Finding 9: ClientEarth's support of the legal working group for civil society organisations was well-received, with members expressing satisfaction in their autonomy and influence on community forestry, yet noting a need for broader engagement and improved use of evidence for advocacy.

Part of ClientEarth's interventions were directed towards supporting the legal working group of national civil society organisations. The MTR team evaluated four responses emanating from a survey of members of the LWG. Findings showed that all four responding organisations were satisfied with function of the LWG and that they felt listened to. One respondent from organisation 1² mentioned *"Yes, we are very satisfied with the way the LWG works. Especially where we are allowed to identify our own topics for our discussions, and we gather to discuss all the issues"*. Another one cautioned that only a small number of national CSOs were involved saying *"But need some upgrading on its activity especially involving majority CSOs at sessions and field experience"*. Yet others mentioned that the LWG was not utilising evidence generated by other members of the group to lead advocacy actions. One stated that *"several presentations have been made ...but very little has been done by FDA and communities to ensure the implementation of the recommendations from the briefing papers and publications"* (organisation 4).

When asked about how the LWG had influenced the organisation's work with communities, one respondent mentioned that the Legal Working Groups supported the development of the community forest by-laws and constitutions. It helped communities to understand the importance of contract negotiation, and the legal status of the development of Community Forest Management Plan- CFMP. A member of organisation 3 explained: *"The LWG has helped us to develop a lot of legal working tools, for example, the "Forest Bible" Collections of forest and land laws and regulations, the Social Agreement Handbook etc."* Another member from organisation 2 described how *"The LWG has helped us to engage communities and companies in ways that are legally backed by laws and regulations"*. Another respondent mentioned that the LWG was helping to create relationships between CSOs, while another intimated that the LWG was creating a type of elite group where few organisations have access to information while others do not. Though ClientEarth mentions that it was a project decision to limit participation of CSOs and prioritise local CSOs, the view from respondents suggest the need for mechanisms to be developed to ensure that more broad-based information sharing between members of the LWG and wider civil society actors. Organisation 1 stated *"Yes, the LWG has helped to build connections between civil society organisations and communities"* while the other organisation stated *"We think this has happened at some point, regrettably, only selected few have broader knowledge when the majority are left without adequate knowledge and working experience of LWG"*.

Overall, respondents are keen to continue their engagement with the LWG for several reasons. The organisations would like to continue to participate in the LWG to increase their knowledge and being hopeful that results would be achieved. *"We definitely would want to continue participating in the education and working of LWG. Lots have been done but how much has been achieved amongst NGOs coalition members? Honestly, ten out of fifteen NGOs Coalition members are not aware of the working of LWG"* (Organisation 3), *"...the LWG should establish a network consisting of CSOs and communities to enhance regular exchange of information about forestry violations and illegalities in their area"* (Organisation 4). These challenges provide further opportunities for CE to work with the members, to address the concerns raised.

*Evaluation question: To what extent has the project achieved its stated outputs in **Gabon**?*

PROJECT OUTCOME 3 GABON: A strengthened legal regime promotes community forestry and IPLC rights

² This approach is used to distinguish responses received through CE administered surveys.

Figure 2 presents the level of progress towards outcome 3 targets. The figure shows that the project is on track to achieve its outcome 3.1 targets. Outcome 3.2 and 3.2.1 targets relating to policy influence have stalled due to the political instability which the country witnessed in 2023.

Level of progress towards outcome 3 targets



Chart: ACE D&H Consultants Ltd • Source: ClientEarth January 2024 Updated Results Framework • Created with Datawrapper

Figure 2: Level of progress towards outcome 3 targets

Project Output 3.1: IPLCs have the knowledge to manage their community forests in line with the law

Finding 10: CE’s interventions increased IPLCs’ knowledge of community forest management in Woleu-Ntem and Ogooué-Ivindo Provinces through targeted training, capacity building, and the deployment of technical assistants, resulting in enhanced governance, increased participation, and stronger collaborative linkages with local administrations.

Project Output 3.1 aims to enable forest communities in Gabon to manage their forests lawfully. Focusing on Woleu-Ntem and Ogooué-Ivindo provinces, the project deployed two technical assistants for on-site support, enhancing community capacities in forest governance. The assistants, trained in all aspects of forest governance, regularly visit communities for workshops, capacity development, and collaboration with local administrations, reducing complaints against the administration.

In Ogooué-Ivindo, capacity-building activities were conducted in communities like NZAFIENG, BALEM-INZANZA, and MBADI to address internal conflicts and improve forest management. The assistants also leveraged community radio for broader outreach. Woleu-Ntem witnessed similar initiatives, with monitoring and capacity strengthening in communities like OKALA PERSPECTIVES FORETS and Lalara 1 and 2, and awareness campaigns via local radios.

Challenges persist, such as unsatisfactory relationships between communities and private companies like Agriwood and the Olam Group. In SAKEVILLE, for instance, conflicts arose due to a family’s monopolistic management of community resources. Project intervention led to the dismissal of the Executive Board and the appointment of a provisional team, yet operational authorisation is pending. In MBELALENE, focus group discussions revealed concerns about the administration’s absence and complicity in community issues. The community forest legal framework provides conflict resolution mechanisms, but local authorities often remain uninvolved. The project emphasises engaging government officials and local elites in conflict resolution, recognizing their influence in community forest management. Capacity building support includes stakeholder mapping to understand power dynamics.

Training programs on community forestry rules, legal rights, and sustainable management practices, including multi-resource inventory techniques, have been conducted in both provinces. Provincial forums and experience-sharing workshops facilitated direct interactions between communities and the forestry administration, addressing concerns and management issues. Gender mainstreaming training was also delivered to enhance women’s participation in forest management. The presence of technical assistants has

increased community requests for support in various aspects of forest management, including electoral processes within community forests. The project benefits from documenting outcomes of these interventions, as demonstrated in the Client Earth NICFI Year 2 Progress Report.

Project Output 3.2: Civil society participates in legislative (and implementation) processes linked to community rights

Finding 11: Project efforts through the platforms like the LWG and Inclusive Working Group have led to civil society contributions to the Forest Code revision and the National Strategy for Community Forestry. However, ongoing political shifts continue to delay the finalisation and implementation of these critical reforms.

Brainforest received an invitation from the Ministry of Forests during the first year of the project to participate in the Inclusive Working Group (IWG) - a multi-stakeholder platform set up by the government in the development of a National Strategy for Community Forestry. Participation allowed Brainforest to express recommendations, learn about the proposed legal reform, and share concerns from communities. Throughout Year 2, the project continued to build civil society's legal capacity for contributions to forest governance processes. Early in 2022, the Inclusive Working Group (IWG) ended its mandate with a pre-validation of the National Strategy on Community Forestry. Since that pre-validation, the legislative process has stalled, and the National Strategy on Community Forestry is still in draft. The recent political instability experienced by the country has further delayed progress.

In 2018, partly in response to the challenges related to IPLCs' tenure and use rights and the CF framework, Gabon issued a moratorium on the allocation of new community forests, calling for a review of national regulations. Since then, the Forest Code reform has been stalled with no meaningful review achieved. In November 2021, the Ministry of Forests advanced the project of a new Forest Code on which civil society had the opportunity to submit comments in December 2021. The Ministry indicated it planned to release the new law by June 2022, but at MTR, this had not materialised. Like with the National Strategy on Community Forestry, the changes at the helm of the Ministry of Forests brought about by the recent political events, mean that the reforms remain stalled.

With the stalled policy processes, there is yet to be a reassessment of what the project intends to focus on in terms of policy advocacy. There has been less engagement with the Central Africa Forest Initiative (CAFI) and the national processes on land use change and land use planning which have direct implications on IPLC rights. Similarly, there does not appear to be any engagement with other climate or conservation processes such as the NDCs or biodiversity frameworks which also have direct impacts on community forests and rights enforcement.

Finding 12: The Legal Working Group (LWG) in Gabon, established by CE, is generally well-received by member organisations for its effective operations, fostering strong team spirit and collaboration among CSOs. However, challenges remain, including the need for more practical field engagement and legal capacity building, to enhance its impact on legal reforms and forest governance processes.

To support CSOs seeking to take part in the forestry governance processes, a LWG³ was set up by CE in Gabon. It was expected to serve as a central body with national reach to improve knowledge sharing in a sustainable manner. Its meetings aim to facilitate the formulation of legal proposals and/or amendments of forestry governance laws. This framework is also expected to strengthen national civil society more generally through the "Gabon Ma Terre Mon Droit" (GMTMD) civil society platform. As part of the MTR, CE carried out an online survey of members to assess the performance of the LWG. Nine questionnaire responses were received.

When asked about the current level of satisfaction with the operation of the LWG, seven out of nine organisations stated that they were satisfied. One respondent stated that *"I am of the opinion that the*

³ The LWG was set up under ClientEarth's FCDO-financed FGMC project "Using the law to address illegal use of forest resources and promote better forest and land governance".

meetings are always oriented according to our needs, and the work environment is always arranged according to our availability, there is always joy and well-being, in one word, comfort is there in a team spirit" (Organisation 5)⁴. *"I really appreciated the level of exchanges between experts, the themes emanated from the experts during each previous meeting, the regularity, the free flow of speech and the punctuality"* (Organisation 7). Six of the nine responding organisations stated that the LWG contributed to creating alliances and fostering synergies between civil society organisations. However, one of the organisations expressed concern that some LWG members were too close to the forestry administration, which affects their level of participation and engagement.

Regarding inclusivity, Organisation 2 said *"I think my opinion is considered during the debates"*, while the respondent from Organisation 6 stated *"I am very satisfied, decisions are taken collegially, and each member freely says what they think"*. To enhance the performance of the working group, members identified the need for joint field missions and engagement with communities to ensure that the contributions of the LWG towards policy reforms are informed by field realities. *"The initiative is laudable, but nothing is worth theory without practice...without advocacy it is difficult to judge the impact of the LWG"*. *"The themes are relevant and important. Unfortunately, after all the work we have done, we have noticed very little progress, mainly due to administrative delays"* (Organisation 10). Other respondents suggested the need for more opportunities for legal capacity strengthening for members on national and international legal frameworks on forests and the organisation of exchange visits with other country groups to share best practices.

All nine responding organisations said they would like to continue to participate in the LWG. *"Yes, because it allows me to make my modest contribution to the evolution of the sector and to continue to follow the processes in progress"* stated the respondent from Organisation 4, while another stated that the LWG is a beneficial structure *"for thinking, exchanging and sharing experiences on legal issues"* (Organisation 8). The legal working group represents an innovative intervention by CE and national partners consequently consider that there is value for its continuous support.

*To what extent has the response achieved its stated outputs in the **European Union**?*

PROJECT OUTCOME 4: EU The implementation of a newly adopted EU law to minimize the risk of putting products on the EU market associated with deforestation.

Finding 13: ClientEarth exceeded its advocacy goals in influencing the EU Deforestation Regulation (EUDR), making 44 contributions, surpassing the target of 35 at MTR. Through strategic engagement in legislative processes, public mobilization, and targeted briefings, ClientEarth crucially shaped the EUDR, ensuring the inclusion of mandatory due diligence and supply chain traceability, while effectively raising awareness among EU decision-makers about the importance of transparent supply chains and effective complaint mechanisms.

Figure 3 shows the level of progress towards MTR targets under outcome 4. Figure 3 shows that the project is well on track or has exceeded its midterm or endline targets.

⁴ This approach is used to distinguish responses received through CE administered surveys.

Level of progress towards outcome 4 targets

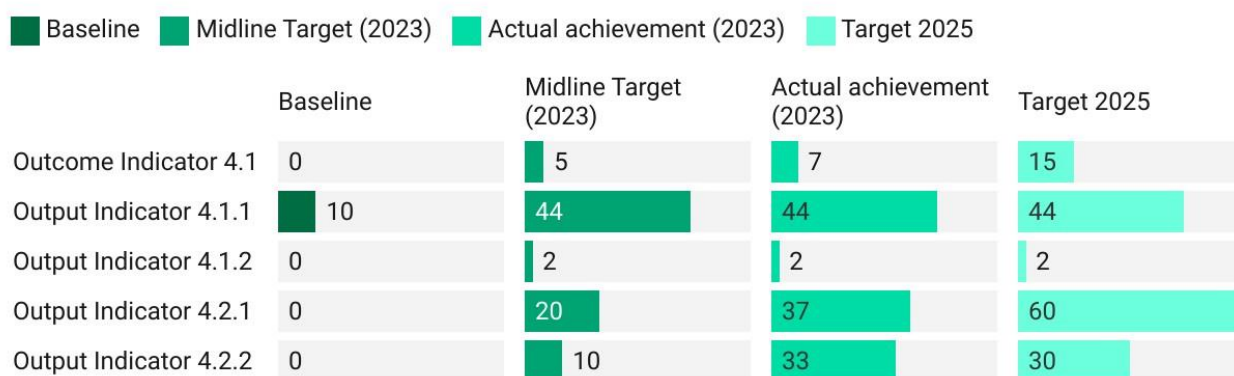


Chart: ACE D&H Consultants Ltd • Source: ClientEarth January 2024 Updated Results Framework • Created with Datawrapper

Figure 3: Level of progress towards outcome 4 targets

Output 4.1 EU decision-makers are aware of the need to include provisions in the new EU law that establish: (1) effective supply chain transparency for products associated with deforestation that are placed on the EU market; and (2) effective complaint mechanisms for CSOs

ClientEarth has been highly successful in increasing awareness and contributing towards the EUDR's legislative processes. ClientEarth played a pivotal role, engaging extensively beforehand and advocating for positive elements such as mandatory due diligence and full product traceability to be included in the regulation. In December 2021, the project published briefings, assessing the strengths, weaknesses, and shortcomings of the regulation and comparing it to the EU Timber Regulation. CE utilised these briefing papers to reach out to numerous members of the European Parliament and Member State Representatives. In June 2022, CE published a briefing emphasizing the need for clear traceability in the Regulation to ensure deforestation-free supply chains. The briefing was shared with EU Parliament Members and state representatives. To amplify its impact, an expert webinar convened industry experts, smallholder representatives, and others (NORAD 2022 Progress Report).

Its contributions were also seen in the response to the public consultation launched by the EC on the 25th of August 2022. The contribution drew the attention of the Commission to three issues that would be crucial in unlocking the potential of the new framework including: (1) access to information, public participation and access to justice; (2) the accessibility of forest data, in particular remote sensing data and its effective use; and (3) the role of forest-related data in the implementation of EU legislation on nature conservation and restoration and on illegal logging and deforestation.

Interviews with key informants highlighted other successful strategies adopted by CE to increase awareness of the EUDR while providing contributions and inputs throughout the process. For instance, CE played a central role within the Brussels based NGO coalition of INGOs working on the EUDR. This included attending weekly meetings, strategising and engaging with key stakeholders. CE played a leading role in shaping the work of the NGO coalition focusing on the Commission's proposal for a regulation on deforestation-free products, including in the drafting and dissemination of civil society position statements published in February and October 2022, which gathered broad support from civil society in the EU and globally (more than 100 signatories). The evidence based approach adopted by CE was also seen in the commissioning of studies to support its advocacy efforts. CE contracted AidEnvironment to conduct two studies (the "EU-Global" trading link study and the "EU-Asia" trading link study). The studies supported the EC's advocacy, informed the project's engagement with EU Member States and generated ideas regarding actions required to support implementation of the regulation.

CE also maintained public mobilisation and attention until the end of the political negotiations between the Council, European Parliament, and the Commission, for example, by organising an [artist support letter](#), in which Barbra Streisand, Coldplay, Jason Momoa, and over 140 entertainment industry stars urged EU leaders to adopt a bold and ambitious law to tackle global deforestation as crucial negotiations on the new rules progress. Additionally, other efforts focused on drawing attention to its message and positions through participation in international events. CE participated in the annual Amsterdam Declaration Partnership's multi-stakeholder meeting which allowed the project to engage with decision-makers from different EU Member States, including Germany, the Netherlands, France, Belgium, and Denmark. CE utilised the event to reiterate its messages around the need for an effective complaint mechanism, protection of IPLC rights, and access to justice in public-facing advocacy. To continue raising awareness and influencing decision makers, CE co-organised a screening of the film, *The Territory*, [#Together4Forests](#) including a panel discussion with key Members of the European Parliament, on 6 September in Brussels ahead of the vote on the Parliament's position.

Output indicator 4.1.2 Provisions on the two topics enacted in the new EU law.

The political agreement reached on 5 December (and adopted by the European Parliament and Council in April and May 2023) includes provisions proposed by ClientEarth and others, including supply chain traceability and a strong complaints mechanism. The project's advocacy has been influential in maintaining the core architecture of the new law, and in the scope and text of certain key provisions such as in relation to supply chain traceability and geolocation, penalties, enforcement checks, complaints, information transparency, and access to justice. The Parliament decided to include an essential requirement to respect international human rights and the rights of indigenous peoples, as well as due diligence obligations for EU financiers investing in forest-risk sectors (NORAD 2022 Progress Report). However, the final outcome maintained several elements that some industry stakeholders and Member States advocated against, such as access to justice provision and the inclusion of important products (such as rubber) in the scope of the Regulation. An additional proposal, which the project developed with Parliament allies, was for a central EU remediation fund for IPLCs impacted by commodity production linked to the EU market. This was well received by the Parliament although ultimately defeated by only a small margin of votes (NORAD 2022 Progress Report).

Output indicator 4.2.1 Number of EU stakeholders (government officials, private sector, and CSOs) trained by CE on the implementation of the new EU law

Following the passage of the landmark legislation in December 2022, key informants noted a lull in activities related to the EUDR. Most respondents mentioned that 2023 was utilised mainly to reflect on the gains achieved and to re-strategise. Consequently, at the time of the MTR, no training events were reported in 2023. Now that the law has passed, it is also unclear what the specific capacity needs are for the various stakeholder groups identified by the project. Implementing effective training would require a clear capacity needs assessment and the methodologies required to deliver the required capacity building.

Output indicator 4.2.2 Number of producer country stakeholders (government officials, private sector, and CSOs) trained by CE on the implementation of the new EU law

While the EUDR is an EU led initiative with implications for commodity producing countries, some efforts were undertaken to raise local awareness in some target countries on the EUDR, processes and likely implications. This included national workshops in Ghana, Ivory Coast, Brazil, Gabon and Liberia. In Liberia and Gabon, there remains a limited understanding of the regulation and how it is likely to impact exports amongst civil society and government officials. During the MTR, respondents raised concerns about the multiplicity of EU regulations, overlaps, and the confusions introduced by this additional regulation in the light of the VPA, the European Union Timber Regulation and the EU forest partnerships. Interviews with key stakeholders highlighted the need for further information regarding the EUDR particularly on the mechanisms for its implementation and how case files or complaints can be effectively brought to the attention of EUDR competent authorities.

Though led by the EU, participants stated that it was for producer countries to assess the implications of the EUDR on their exports and to take the necessary measures required to comply with the new regulations, while others suggested that it was more for private sector actors to change their practices accordingly. In any case, action is required from governments and the private sector to adjust legislation or practices to conform to the new demands, while local and international civil society actors can also help enhance understanding of the rules and support monitoring its application in various countries. At the time of the MTR, key informants mentioned that since the passage of the regulation in December 2022, there was little progress towards preparation for implementation in 2023. This included delays in the establishment of the EUDR competent authorities, guidelines on benchmarking, complaints mechanisms, development of traceability systems amongst others. Key informants also indicated that many INGOs were also unclear about their roles during implementation and how they could support producer country partners to document and bring cases to EUDR competent authorities. There were serious concerns from some respondents following the failure of EU member states to implement the timber regulation and the lack of effectiveness of competent authorities. Some called for stronger collaboration with CE to support define what actions could be taken to strengthen EU member country preparedness for implementation, particularly on raising awareness, creation of competent authorities and provision of necessary resources for these entities to play their roles.

Evaluation question: What were the facilitating and constraining factors to the implementation of this project – internal factors as well as external factors?

Finding 14: The project's interventions have thrived on a foundation of technical expertise, locally innovative approaches, and strong local engagement, yet faced challenges in project management, community disputes, budgetary constraints, resistance from political and industrial sectors, as well as external factors like political shifts and access challenges.

Facilitating factors

ClientEarth's interventions were significantly bolstered by the technical expertise and experience of its partners. The collaboration wasn't merely about pooling resources but enriching interventions with diverse professional insights. As one respondent aptly put it, "We could see the benefits from having the partners, bringing in the expertise." This underscored the critical role each partner's unique skills and knowledge played in strengthening the overall strategy and execution of the projects. Integrated work plans among country partners were not just about coordination but creating a robust platform where different expertise converged, leading to more innovative and effective solutions. The Brussels-based NGO coalition was instrumental in forming a comprehensive, evidence-based approach to the EUDR work. This coalition did more than bring together different organisations; it created a unified vision and strategy based on diverse perspectives and expertise. A key benefit, as pointed out by one of the respondents, was the ability to make "holistic proposals to the EU legislators." However, aligning different organisations was not without its challenges in the "fast-moving, high-pressure environment", necessitating constant adaptation and improvement in communication and procedures. ClientEarth's evidence-based approach facilitated the update of its positions through well-documented and presented positions.

ClientEarth's strategy was marked by innovative and context-specific approaches. This included leveraging alliances for advocacy, integrating views from NGOs in producer countries, and shifting focus from technical aspects to political angles as needed. The use of media, such as collaborating with a film production company for screenings and panel discussions, exemplified the innovative approaches taken. These efforts were not just about raising awareness but also actively influencing the democratic process within the EU.

The local presence in communities was a critical component of the interventions. This local engagement was not just a mere presence but a committed effort towards understanding and addressing the unique needs of each community. In places like Gabon, working with local organisations like Brainforest and leveraging the expertise of local forest and legal experts had been pivotal. These collaborations ensured that interventions were grounded in local realities and expertise, further enhancing community buy-in. In Liberia, the long-established presence of partners such as FCI, HPA, SDI, and NUCFMB allowed for a more nuanced understanding of the challenges and opportunities in each area, leading to more effective and tailored

interventions. Communities in both countries began to benefit from the results of the intervention, enhancing local ownership.

The interventions were characterised by an adaptive and learning approach, responding to emerging needs such as the need for organisational capacity building in Liberia and Gabon. The project's engagement with livelihoods support and gender demonstrated a further capacity to respond to context-specific needs. The program's responsiveness to these emerging needs, including exploring new concepts like ICCA and carbon markets, highlighted its dynamic nature. The effective allocation of resources and funding was a cornerstone in the successful implementation of the interventions. Dedicated teams and flexible donors were crucial in responding to the needs of the programme. The grant also allowed CE to recruit dedicated staff to work on the EUDR. Working with national grantees led to efficiency gains, building on existing structures rather than creating new ones, critical for sustainability. Regular monthly meetings and activity reporting created a structured framework for continuous assessment and strategic adjustment. Training of Trainers sessions and collaborations with diverse expertise from community networks, legal teams, and community groups were pivotal. Incorporating gender considerations into forest governance and forming Legal Working Groups further exemplified the project's multifaceted approach.

Constraining factors

ClientEarth's venture into managing a large consortium represented a significant shift from its previous roles, particularly in Liberia where it transitioned from a partner to a project manager/lead. This change highlighted the need for enhanced project management skills, especially for lawyers who found themselves in unfamiliar roles such as organisational development and financial management. In Gabon, managing extensive programs with limited resources and the need to include more communities in practical trainings presented challenges.

The project faced difficulties in implementing effective dispute-resolution mechanisms and legal support. In Liberia, despite efforts to sensitize communities, the uptake of legal support services was lower than expected. Communication gaps or mismatches between services offered and community abilities to document potential cases were potential causes. In Gabon, internal conflicts in communities, attributed to financial transparency issues, resource capture by individuals, and insufficient conflict resolution mechanisms, continued to pose challenges.

ClientEarth's initiatives encountered resistance from political and industrial sectors. In Liberia, industry pushback, particularly on human rights issues, and changing perceptions of policy makers posed challenges. In some communities, resistance to project interventions was overcome through collaboration and training sessions organised by project partners. In other instances, local authority interference in community forest management was addressed through partner interventions. Regarding the EUDR, industry concerns about traceability requirements and supply chain impacts presented challenges. Despite this, ClientEarth's advocacy efforts led to some of their contributions being considered, although incorporating human rights and IPLCs language was less successful.

Budgetary constraints limited the project's ability to expand its reach and scale up achievements in its fourth and fifth years. The shortfall in funding, compounded by changing funding landscapes and unmet expectations from the UK government's FGMC Programme, restricted knowledge sharing and resource provision between communities. External factors like the Covid-19 pandemic delayed the start of the project and necessitated a shift to online working. In Gabon, political situations and leadership changes at the Ministry of Forests affected project implementation and stalled forest code reforms. Establishing contact and securing buy-in from new officials required additional effort and resources. Both Liberia and Gabon faced challenges due to poor road networks, particularly during rainy seasons, affecting field activities and regular community monitoring by technical assistants.

3.3 Short Term Impact: To what extent is the project on track or likely to achieve its stated outcomes and consequently, NORAD target outcomes?

Evaluation question - Outcome 1: How likely and what emerging evidence exists from the project so far of community forests being stronger and contribute more effectively to reducing deforestation, conserving biodiversity, and generating sustainable economic development in Liberia

Finding 15: The project in Liberia demonstrates a high likelihood of achieving its outcome of enhancing community forests' contributions to reducing deforestation, conserving biodiversity, and fostering sustainable development. This success is evidenced by significant advancements in legal empowerment, transformation of community roles into informed advocacy, effective dispute resolution, and notable progress in gender equity, particularly in women's leadership in target communities.

The evidence from the project suggests a likelihood of achieving Outcome 1, where community forests make an increased contribution to reducing deforestation, conserving biodiversity, and fostering sustainable economic development in Liberia. Key indicators supporting this include:

Enhanced Dispute Resolution and Legal Empowerment

The project has markedly improved the legal empowerment of communities in contractual disputes. This is best illustrated by the instances where communities received crucial legal advice from Heritage Partners & Associates (HPA), particularly when companies failed to fulfil their agreements. A notable instance is described as, *"communities have access to HPA. There are two instances where they have provided legal advice around where a company has not been fulfilling its side of its agreements."* This support has been pivotal in shifting the balance of power, enabling communities to assert their rights and entitlements more effectively.

From passive roles to informed advocates

The project has catalysed a shift in community engagement, transitioning members from passive roles to active, informed advocates. This transformation is a direct result of comprehensive training and capacity-building efforts. The enthusiasm and proactive stance of community members in legal matters are captured in a reflection: *"The community members are really enthusiastic and willing to accept the training. We have seen how the training received is negotiated with companies in very different ways – communities have moved from just being passive participants to active advocates of their interests."* This is further demonstrated in the use of forest monitoring technologies for advocacy and law enforcement.

The project's technical support has led to improved community forest management. Tools like TIMBY have empowered communities to document issues effectively, as demonstrated in Gbarpolu (Korninga B), where the community used TIMBY to document and report a mining company's violation. This incident led to a successful legal redress, as highlighted: *"The TIMBY app was used by community members to capture and document the act and report to the NUCFMB. The community sought redress to the court and the mining company was made to pay about 4 million USD to the community."* Similarly in Gheerbarh 1, communities are now engaging more constructively in conflicts and negotiations, leading to tangible benefits like timely payments from companies and increased accountability in leadership. The impact of these changes is significant, as described: *"for example, Gheegbarh 1 has received over 200 thousand USD from concessions operating in the community forest. Korninga B community are building a guest house with their benefits from their community forest."* In Korninga A, SDI worked with governance structure to resolve the issue transparency in financial management by replacing the leaders that mis-managed the funds with the help with the Forestry Development Authority (FDA). In the same community, strengthened capacities of the new leadership led to more transparent and accountable resource management for wider community benefit.

Gender Equity and Women's Leadership

Promoting gender equity is a notable achievement of the project, with increasing female leadership in community assemblies, particularly in Barconi where a woman now co-chairs the community forest management body. FCI Gender Trainings have boosted women's involvement in forestry-related discussions and encouraged them to take leadership roles in governance bodies. Women's understanding of Community Rights Laws, including gender requirements, has improved, and legal trainings have yielded significant benefits. The development of the Women's Charter clarifies legal frameworks, potentially enhancing women's benefits from forest resources. Overall, the project in Liberia has empowered communities through legal support, capacity building, gender equity, and technical assistance, leading to transformations in community engagement, women's leadership, dispute resolution, and forest management. Its continued focus on sustainable implementation and addressing challenges will be key to maintaining and expanding these outcomes, including reducing deforestation and conserving biodiversity.

Evaluation question - 3: How likely and what emerging evidence exists from the project so far of a strengthened legal regime promotes community forestry and IPLC rights in Gabon?.

Finding 16: Outcome three is likely to be achieved as the project has made strides in strengthening legal frameworks for community forestry and enhancing gender equity in forest management. Emerging evidence shows that efforts are contributing to improved living conditions, greater economic opportunities, and increased awareness and capacity in contractual negotiations and community monitoring in target communities, setting a strong foundation for inclusive local socio-economic development.

In Gabon, the project aimed to strengthen Indigenous Peoples and Local Communities' (IPLC) rights and enhance community forestry, faced with challenges like unrecognized customary tenure and an incomplete forest legal framework. The project's progress towards these ambitious goals is reflected in several tangible outcomes and field observations.

Legal Framework Development and Policy Influence

The project has seen progress in developing the legal framework for community forestry in Gabon. The revision of the forestry code and inputs into the National Strategy on Community Forestry were valuable contributions although these initiatives have stalled due to external factors like government changes. A participant noted: "We were working on the revision of the forestry code – initial drafts were provided in December 2021." The transitional government's commitment to the CFI process holds promise that government is committed to forest preservation and its climate objectives. Ongoing work on the national land use plans merits the project's attention to ensure that community forestry efforts are well aligned to these processes.

Empowerment of Women in Leadership and livelihoods options

A significant achievement is the increased role of women in community associations. In two communities visited during the MTR field visit, women have been elected as presidents, marking a shift towards gender equity in forest management. This change is encapsulated in the statement: "They decided to elect a woman with the view that they can better manage the resources."

At the community level, there have been observable changes in living conditions and economic opportunities. The inclusion of women in activities related to non-timber forest products and their increased participation in community decision-making are significant strides. In two pilot communities the project has not only imparted valuable skills but also led to economic benefits. The success of these workshops is evident in one community's achievement of selling their forest products, demonstrating the project's impact on livelihood enhancement. The development of pit-sawing and the results from NGOMESSI, SAKEVILLE, and MBELALENE communities illustrate the tangible benefits of the project.

Improved Contractual Awareness and Community Monitoring

Communities are now more aware of their rights in contractual agreements with companies, leading to better claims of benefits and reduced complaints. The introduction of community monitoring tools has enhanced the oversight of forest management, facilitating informed decision-making. A participant reflects: *"There are less complaints now because they understood the process, they have renewed their plans, members of the association have to be based in their communities."*

Communities are now more aware of their rights, negotiating contracts with greater confidence and understanding, as reflected in the reduced number of complaints and the enhanced ability to claim benefits. The field notes state that *"they don't sign the contracts now blindly with the companies and can claim their benefits better,"* highlighting this progress. The installation of community technical assistants has strengthened links with local administration and improved the community access to support while enhancing the presence of the administration on the field. This development is crucial for sustaining the project's outcomes and ensuring continued local engagement.

Short-term Impacts and Sustainable Development

The project's short-term impacts in areas like the Okano Department are notable. The Prefecture's Secretary General acknowledges the project's positive influence on community forestry and livelihoods: *"the community forests would be major assets for creating jobs for the young people of the Department..."* This sentiment is echoed by the Ministry's Deputy Director General of Forestry, highlighting the government's commitment to expanding community forest policy.

The project's impact on improving living conditions and economic opportunities in communities like Ngomessi and Mbelalene is another highlight. The establishment of an emergency fund to meet health needs, redistribution of income from logging operations, and the resumption of plantation activities demonstrate the project's positive socio-economic potential. These changes are vividly described in the words of local residents, who note improvements in household income, purchasing power, and the availability of consumer goods. The project interventions in Gabon, have led to notable short-term impacts. These include the advancement of gender equality, economic empowerment, enhanced community engagement, improved living conditions, legal framework improvements, infrastructure development, and a positive outlook towards environmental education and sustainable management. The success of these interventions is reflected in the words of community members, local authorities, and technical experts, underscoring the multifaceted progress towards the project's impact.

Evaluation question - Outcome 4: How likely and what emerging evidence exists from the project so far of the effective implementation of a newly adopted EU law to minimise the risk of putting products on the EU market associated with deforestation, in particular, provisions related to transparency of supply chains, and complaint mechanisms for CSOs.

Finding 17: ClientEarth's influential advocacy has been crucial in the passage of the EU Deforestation Regulation, bringing vital improvements in supply chain transparency, complaint mechanisms, and respect for human and indigenous rights, in line with its commitment to robust enforcement and accountability. Outcome 4 is likely to be achieved. However, there are concerns about the potential dispersion of civil society efforts during the preparation and implementation phases.

Landmark EUDR passed

ClientEarth's advocacy efforts have been instrumental in shaping the new deforestation-free products regulation adopted by the EC. The political agreement on the Deforestation Regulation adopted by the European Parliament and Council of the EU in demonstrates a significant step towards reducing the risk of putting products on the EU market associated with deforestation, in particular, provisions related to transparency of supply chains, and complaint mechanisms for CSOs.

The political agreement achieved contains crucial improvements on the Commission's proposal, especially in terms of supply chain traceability and a strong complaints mechanism. This aligns with ClientEarth's advocacy

for robust enforcement and accountability measures. The inclusion of these provisions marks a substantial step towards ensuring that products linked to deforestation do not enter the EU market. A significant advancement is the Parliament's decision to include requirements to respect international human rights and the rights of indigenous peoples in the new law. This inclusion, along with due diligence obligations for EU financiers investing in forest-risk sectors, reflects the project's commitment to safeguarding the rights and livelihoods of IPLCs.

In terms of engaging producer countries, ClientEarth and partner organisations have advocated for greater participation by producer country stakeholders in the benchmarking mechanism of the proposed Regulation. This is a strategic move to ensure that the voices and concerns of these key stakeholders are incorporated in the policy-making process, as noted in the NORAD 2022 Progress Report.

Future Steps and Actions for Implementation

Looking forward, the focus is on preparing for the implementation of the newly adopted law. ClientEarth's strategy includes supporting implementation through information collection, guiding countries and organisations in forming substantial concerns/complaints, and preparing cases of non-compliance. Engagements with EU member states and companies are being planned to ensure readiness for compliance. The involvement in producer countries like Brazil and Indonesia, where workshops and discussions with local organisations are being organized, demonstrates a forward looking approach. However, there is a lack of clarity regarding the role of the Brussels-based NGO coalition, with key respondents fearing a dispersal of efforts, which might limit the effectiveness of civil society interventions. One MTR participant said: *it has proven difficult to coordinate and implement country missions and to coordinate the interventions towards African partners and others*. There are definitely calls for better coordination with one key informant saying: *On the partner work, maybe to bring together partners on work plans to better understand next steps within the EUDR and where there could be cooperation. There is need to understand their theories of change and their ways of working in order to build synergies*.

ClientEarth's project under Outcome 4 shows a high likelihood of success, evident in its significant influence on EU policy development, engagement with producer countries, and planning for future implementation and enforcement. The project's alignment with the ambitious goals of reducing deforestation-linked commodities in consumer markets is clear, as it navigates complex legal, policy, and socio-economic landscapes to drive meaningful change. The proactive engagement in both the EU and producer countries, coupled with a deep understanding of the cultural and political contexts, positions ClientEarth to effectively contribute to the global effort to combat deforestation.

3.4 Gender and Inclusion: To what extent were gender and inclusion considerations taken into account in designing and implementing the projects, targeting of locations and of beneficiaries?

It is well documented that women's participation in decision-making and forest governance is key for the effective and sustainable management of forest resources⁵. Numerous case studies in Africa, as well as Asia and Latin America, have shown that women have traditional knowledge of forest rehabilitation activities, managing forestry products, and forest governance. Consequently, putting women at the centre of forest management and governance initiatives, rather than at the margin is a prerequisite to achieving project goals and sustainable forest governance⁶.

⁵ Agarwal, B. (2010) *Gender and Green Governance: The Political Economy of Women's Presence Within and Beyond Community Forestry* Oxford: Oxford University Press

Jhaveri, N. J. (2020) *Forest Tenure Pathways to Gender Equality: A practitioner's guide* Bogor, Indonesia: CIFOR https://www.cifor.org/publications/pdf_files/Books/Gender_Equality.pdf

Kristjanson, P. et al. (2019) *Taking Action on Gender Gaps in Forest Landscapes: A working paper* PROFOR

⁶Duguma LA, et al. (2022) *The forgotten half? Women in the forest management and development discourse in Africa: A review*. Frontiers in Forests and Global Change, vol 5, Frontiers Media SA, 2022

<https://gender.cgiar.org/publications/forgotten-half-women-forest-management-and-development-discourse-africa-review>

The project is clearly committed to increasing the participation and leadership of women and previously under-represented groups in forest governance and protection. Partners explained that they take a holistic approach to gender and inclusion, where every effort was made to ensure that no one was left behind. By actively promoting equal representation, soliciting women's views, and creating inclusive governance structures, the project partners demonstrated to some extent their commitment to fostering an environment of equality and inclusivity. However, in communities and countries in which gender inequality is deeply rooted, many challenges remain. The second half of the programme provides an opportunity to increase the targeted action to further move women from the margins to the centre of initiatives.

Evaluation question - How did the funding proposals consider gender-specific needs and inclusivity?

Finding 18: ClientEarth's funding proposal exhibited a strong commitment to gender equality and the empowerment of IPLCs, with a strategic focus on integrating these principles into legal frameworks. However, the proposal lacks specific measures for youth and people with disabilities, and omits detailed gender-disaggregated indicators for effective tracking.

The funding proposal underscored a commitment to gender equality and enhancing women's roles in forest governance, aligned with SDG5. In Gabon, it highlighted a lack of gender equality safeguards in forest legal frameworks, despite matriarchal aspects in communities. The project aimed to ensure women's equitable representation in community forestry and advocated for gender inclusion in legal frameworks. In Liberia, the focus was on correctly implementing laws that provided for women's rights. The proposal recognised the vital role of law in managing forests and addressing deforestation. Equitable laws improved rights, livelihoods, and conservation outcomes. Community forestry was seen as key to local food production (SDG2), job creation (SDG8), and addressing rural depopulation in Gabon.

CE's approach focused on systemic change and building alliances for reform. It involved supporting local CSOs, IPLCs, government, and private sector representatives, integrating community forestry with incentive structures, and aiming to reduce deforestation. Change would be demonstrated through assessing knowledge, attitudes, and practices, especially regarding gender and IPLC rights. The proposal included tracking gender participation in various project activities but was silent on the specific roles of youth and people with disabilities, lacking targeted actions and indicators for their participation.

Implementation mechanisms were based on the expertise of national partners like FCI in Liberia and consultants in Gabon, ensuring interventions were context-specific and sensitive to local gender and IPLC rights issues. The proposal focused on long-term engagement, aiming to integrate community forestry into broader economic and environmental strategies, enhancing its potential impact on tropical forest countries. The proposal was silent on the specific role of youth or people with disabilities, with no specific actions proposed to ensure their participation. The results framework did not include any indicators on the various factors identified for tracking, lacking outreach and gender disaggregate indicators.

Evaluation question: What specific actions are being undertaken to ensure women, IPLCs and other vulnerable groups are included?

Finding 19: The project has implemented comprehensive actions to enhance the inclusion of women and IPLCs in target communities. However, challenges like cultural barriers and limited participation of specific groups, such as youth and people with disabilities, indicate areas for further development.

Liberia

In Liberia, the project implemented a comprehensive capacity-building approach to include women and vulnerable groups in community forestry. This initiative focused on gender parity in community meetings and training sessions, valuing women's contributions and ensuring their perspectives were integral to decision-making. Organisers encouraged women to express their views, enhancing their participation in governance.

Community governance structures were designed inclusively, with gender parity in representation as a key requirement in the constitutions and bylaws template. Efforts were made to ensure representation from every community, regardless of distance. Furthermore, women were empowered to take active roles in discussions and decision-making, moving beyond participation to equipping them with necessary skills and confidence. The Chief Officer of Boe & Quillah Community Forest Management Body highlighted the project's impact in enabling women to engage effectively in forest governance.

The Women's Charter, developed by the project, aimed to increase women's participation in leadership across the Natural Resource Sector, particularly in Forest and Land in Liberia. This Charter was expected to strengthen gender awareness among Civil Society Organisations and guide the implementation and monitoring of gender-sensitive approaches. The project also focused on educating women on identifying and reporting best practices in community forest management. Specialised training by FCI in 2022 enhanced women's understanding of forest governance structures, legal requirements for women's participation, and their roles. A women's leadership event was organised to discuss lessons learned and create a platform for women to share experiences and discuss issues, building momentum on women's leadership.

"We are focused on how to learn more as a consortium and for each partner to follow up more and assess the changes happening and how people are using the training and capacities. We have a women's leadership event this year because we know that, though women are part of governance structures, they are not always listened to. So, we identified the need for women leaders to come together and to discuss lessons learned. We put together a working group on women's leadership with women's leaders, mobilising the participants and leading the three-day event. We created the space for women to have their voices heard, share experiences and discuss their issues, getting approval and recognition. This feels like one of the key activities for building momentum on women's leadership".

Despite these efforts, challenges remained, such as low female participation in using the TIMBY application to report violations. Suggestions to address these challenges include women-only training, working with men to understand the importance of women's participation, appointing men as gender ambassadors, and understanding barriers to women's participation. Additionally, there was a focus on Non-Timber Forest Products (NTFPs) and alternative livelihoods in community forest management to address women's involvement constraints.

Gabon

In Gabon, discussing gender issues was challenging due to cultural barriers in some communities. To address this, the project team initially focused on civil society, organizing workshops led by a gender specialist to integrate gender mainstreaming in the national forestry code. These workshops, involving private sector representatives, government officials, and technical assistants, marked the first exposure to gender training for many participants. Capacity-strengthening events were held at national and local levels. National training sessions for Civil Society Organisations (CSOs) and forestry administration personnel aimed to develop expertise in women's rights and forest governance. These sessions prepared the groundwork for supporting women in governance bodies, equitable benefit distribution, and implementing gender-sensitive approaches in local development funds and decision-making.

Community-level culturally responsive training modules covered topics like leadership, Non-Timber Forest Products (NTFPs), and good governance, focusing on women's participation in forest governance. Brainforest, with a gender consultant, ensured the materials were culturally sensitive. The project also created and disseminated gender-focused communication tools using local radio and languages. Despite cultural challenges, significant progress was made. Brainforest's gender training sessions led to the election of two women as association presidents, a milestone in gender equality in leadership. In Okala community, gender considerations are integrated into activities, with support for young single mothers and youth involvement to ensure inclusivity. A community member explained, *"Gender is considered in all our activities, young single mothers benefit from an allowance of 50,000 CFA francs until resources are exhausted. We have a strong*

involvement of young people; increase communication and awareness to mobilize everyone beyond the differences observed.”

In the activity reports, there was no mention of specific actions to ensure women's inclusion at the EU level. However, the strong advocacy ensured the EUDR included provisions considering international human rights and the rights of indigenous peoples. At the country level, interviews, focus group discussions, and documentary reviews revealed no specific interventions of the project targeting young men and women as well as people with disabilities in the intervention.

3.5 Sustainability: How likely are the achievements of the project likely to continue after it ends?

Evaluation question: How likely are the gains achieved through this project likely to continue beyond the project implementation period?

Finding 20: The likelihood of the project's gains continuing beyond the initial implementation period is high, supported by significant legal framework advancements, local ownership through capacity building, and robust outreach and partnerships. However, sustainability is potentially constrained by social, economic, institutional, political and environmental risks.

The project achievements are likely to continue beyond the project initial period as demonstrated in the following areas.

Pursuing Long-lasting Results through Changes in the Law:

The project significantly shaped legal frameworks in its target areas. In Liberia, community empowerment through legal governance training improved enforcement of the community forest legal framework. Meanwhile, in Gabon, efforts to revise the forestry code and develop a National Strategy on Community Forestry made progress, despite some external delays. A crucial aspect was strengthening the legal regime for community forestry and Indigenous Peoples and Local Community (IPLC) rights, coupled with providing training on community forestry rules and legal rights. This included support to legal working groups in both Liberia and Gabon. In Liberia, legal training and governance, the development of equitable contract templates, and constitution standards empowered communities like Totoquella Town and Bondi Mandingo in forest resource management and negotiations. The next phase of the project aims to further embed these tools in community practices, enhancing sustainability beyond the initial period.

ClientEarth's advocacy and influence were key in shaping the EU law to minimize deforestation risks associated with market products. As one respondent mentioned: *The EUDR is a law and companies have to respect it. It shifts the burden on companies to address drivers of deforestation. In this case, the companies have to respect the regulation and the companies have to respect and makes me confident that this can be successful.* This strategic approach promises sustained impact on forest governance and responsible commodity sourcing, aligning with global deforestation reduction goals.

Ensuring Local Ownership through Local Level Capacity-Building:

The project's sustainability objectives were also built on ensuring local ownership through capacity building. The involvement of local communities in these training initiatives has fostered a sense of ownership and responsibility towards forest management. One respondent mentions that *“I think building legal capacities of communities and of CSOs is something good for sustainability. Especially, if we can contribute to change legal frameworks and to have better laws that are more transparent, participatory that could last beyond the project”*.

ClientEarth's approach to the development of contributions towards the EUDR included creating transparent debates amongst relevant stakeholders, engaging with civil society partners, government officials, policy

influencers, and the private sector. The MTR team agrees with CE that this inclusive approach is essential to ensuring that the regulatory mechanism developed will be effective in long-term implementation. The project's indirect impact through EU policy-making supports local ownership by promoting sustainable practices in commodity production. This benefits communities in producer countries by ensuring that their forest resources are not exploited unsustainably. Although the project focused more on policy advocacy at the EU level, the ripple effect of these policies supports local communities in the long term.

Strengthening Robust Outreach Platforms and Partnerships:

The project's success in Liberia was partly due to the establishment of platforms for legal training and dispute resolution. In Gabon, the use of community radio broadcasts and collaboration with local administrations exemplified effective outreach strategies. Partnerships with local organisations like Brainforest in Gabon and FCI, HPA, NUCFMB, and SDI in Liberia enhanced project impact. In both countries, the project built on and revitalised civil society legal working groups, enabling them to contribute to national level issues on forests and IPLC rights. It is expected that these partnerships and platforms will continue even beyond the project initial period. In both countries, collaborative relationships have been strengthened with forestry administrations which has enhanced the acceptance, visibility and legitimacy of project partners in target countries and communities. ClientEarth's active participation in a Brussels-based NGO coalition, organizing events, and engaging in webinars established effective platforms for raising awareness and fostering collaboration. These efforts were integral in building a unified strategy for influencing EU legislation, ensuring a broader, sustained impact.

Disseminating Materials:

The project has focused on the development and dissemination of various materials, such as contract templates, legal toolkits, and guidelines. These resources are crucial for communities to continue applying best practices in forest management and legal negotiations. These tools helped in documenting issues, enhancing governance, and ensuring community participation in community forest management. The project also leveraged technical assistants and community radio for wider outreach. The dissemination of briefing papers, reports, and position statements played a crucial role in informing stakeholders about the importance and implications of the new EU law. This proactive dissemination helped in building a strong case for the law and in ensuring its effective implementation. It is expected that the knowledge and resources will continue to be utilised after the project ends through the local ownership demonstrated earlier.

Sustainable Development Goals:

The project's alignment with sustainable development goals is evident in its approach to gender equity, improved living conditions, economic empowerment, and environmental sustainability. In both Liberia and Gabon, the project aligns directly and indirectly with multiple SDGs - poverty reduction and food security (1,2); health, education, and sanitation (3,4,6); gender equality and reducing inequalities (5, 10); decent work and economic growth (8); responsible consumption and production (12), life on land (13), climate and biodiversity (15) and international partnerships (16, 17).

Evaluation question - What are the main social, economic, institutional, and environmental risks that might constrain continuation?

It is important to highlight that the forest governance challenges addressed by the project are systemic in many cases and require long term efforts to address. Consequently, while there has been significant progress demonstrated in the first phase of the project, it must pay attention to the following priority risks and find mitigation measures.

Social Sustainability Risks: Internal conflicts, mismanagement, and lack of transparency in managing community forest resources in Liberia and Gabon threaten social cohesion and the sustainability of project achievements. Internal community conflicts over resource management, ineffective conflict resolution, and benefit-sharing mechanisms could impact the project negatively. Concerns about creating a community-level intellectual elite in Liberia due to the same individuals consistently attending meetings and trainings were raised. Resistance or lack of awareness among stakeholders, especially in producer countries (EUDR) and

target communities, could hinder the effectiveness of the regulation and other project gains. Concerns about the role of international NGOs and local partners during the EUDR implementation were noted, with limited understanding and clarity on their roles and intentions.

Economic/Financial Sustainability Risks: Dependence on timber exploitation and payments from private sector operators as main income sources for communities in Gabon and Liberia is risky due to wider economic factors. Delays or non-payments by companies raise frustrations and tensions. The project's support for community diversification is in early stages, and market access is often overlooked, potentially leading to the failure of community enterprises.

For the EUDR, potential economic impacts on industries reliant on commodities linked to deforestation could lead to resistance. The regulation's effect on market dynamics and trade relationships needs careful management. Financial sustainability is threatened by reduced budgets in later project years and local partners' high dependence on project funding, with no clear exit strategy for post-project continuity.

Institutional/Political Sustainability Risks: Political interference, staff turnover within partner organisations and public administrations, and the risk of reverting to old practices pose institutional sustainability risks. In Gabon, changes at the Ministry of Forests have delayed forest governance policy processes. Effective enforcement of the EUDR regulation requires strong, capable institutions, with risks including insufficient resources, lack of expertise, and potential for corruption.

Environmental Risks: The project aims to address deforestation, climate change, and biodiversity loss. These risks, coupled with systemic forest governance challenges, require long-term efforts and strategic responses to ensure the continuation and amplification of the project's impacts.

4. Conclusions and Recommendations

4.1 Conclusions

Conclusion 1:

ClientEarth's project exhibits significant value in enhancing legal frameworks and advocating for community rights in forest governance across regions, notably in Liberia, Gabon, and within EU legislation through the EUDR. However, its coherence is impacted by a varied awareness of other NORAD-funded projects and a lack of structured strategic planning and coordinated collaboration, particularly in stakeholder engagement and private sector involvement. ClientEarth's project would benefit from a more cohesive approach in all intervention geographies that not only leverages its strengths in legal capacity building, advocacy and policy influence but also aligns more closely with other NORAD initiatives and systematic strategic planning.

Conclusion 2:

In Liberia, the project has significantly advanced forest community capacities in sustainability, alternative livelihoods, gender inclusion, and biodiversity, primarily through targeted legal and governance training. This training, coupled with the development of equitable contract templates and constitution standards by ClientEarth and its partners, has notably empowered communities in managing forest resources and conducting negotiations. While these achievements mark a successful enhancement of community capabilities, the project MTR also identifies a need for better outcome measurement and direct livelihood support to maximize the effectiveness of its initiatives. The project's efforts in developing tools to align with forest laws have effectively addressed challenges in the community forest law framework, particularly those posed by timber companies' non-compliance, leading to stronger, more integrated governance structures in communities. Furthermore, the project has strengthened the capacity of forest communities in dispute resolution, as evidenced by successful mediations with timber companies and a heightened understanding of forestry laws through comprehensive training programs and tools like the TIMBY app. Support for the legal working group has fostered enhanced legal knowledge and civil society connections, although there's a recognized need for wider engagement and more strategic use of evidence in advocacy.

Overall, the project in Liberia is highly likely to achieve its goal of enhancing community forests' contributions to reducing deforestation, conserving biodiversity, and fostering sustainable development (project outcome and NICFI outcomes). This success is underpinned by substantial progress in legal empowerment, the transformation of community roles into informed advocacy, effective dispute resolution, and progress in gender equity, particularly evident in the increased leadership roles of women within community forest governance.

Conclusion 3:

In Gabon, ClientEarth's interventions have notably increased community forest management knowledge, particularly in the Woleu-Ntem and Ogooué-Ivindo Provinces. This success is attributed to targeted training, capacity building, and the deployment of technical assistants, which have collectively enhanced governance, increased community participation, and fostered stronger collaborative linkages with local administrations. These efforts have led to more effective community involvement in forest management, indicative of a positive trend towards improved forest governance.

Moreover, the project's engagement through platforms such as the Legal Working Group (LWG) and the Inclusive Working Group has significantly contributed to civil society's involvement in the revision of the Forest Code and the National Strategy for Community Forestry. However, the ongoing political shifts in Gabon pose challenges, causing delays in finalizing and implementing these critical reforms. Other governance processes driven by CAFI, the NDCs and biodiversity framework also require attention, but these are yet to be explored⁷. Despite these hurdles, the LWG in Gabon has been well-received for fostering strong team spirit and collaboration among civil society organisations. There is, however, a recognized need for more legal capacity building to amplify its impact on legal reforms and forest governance at a national level.

The project in Gabon also shows substantial progress in strengthening legal frameworks for community forestry and enhancing gender equity in forest management. There is emerging evidence that these efforts are contributing to improved living conditions, greater economic opportunities, and increased awareness and capacity in contractual negotiations and community monitoring (project outcome, NICFI outcomes). Such advancements are laying a strong foundation for more inclusive forest governance and socio-economic development in the targeted communities.

Conclusion 4:

ClientEarth has demonstrated significant success in its advocacy efforts, particularly in influencing the EU Deforestation Regulation (EUDR). The organisation has not only achieved but exceeded its advocacy goals, making 44 contributions and surpassing its target of 35 by the mid-term review. This success is attributed to strategic engagement in legislative processes, public mobilization, and targeted briefings, which have been pivotal in shaping the EUDR. Key contributions include ensuring the inclusion of mandatory due diligence and supply chain traceability in the regulation, as well as effectively raising awareness among EU decision-makers about the importance of transparent supply chains and effective complaint mechanisms. These improvements are in line with ClientEarth's commitment to robust enforcement and accountability.

However, despite these significant achievements, there are emerging concerns about the potential dispersion of civil society efforts during the preparation and implementation phases of the EUDR. These concerns highlight a need for strategic focus and coordination to ensure that the momentum gained in advocacy and policy shaping translates effectively into tangible results during the implementation phase. This situation underscores the importance of maintaining a cohesive approach and unified direction among civil society actors to maximize the impact of the regulation and achieve the desired outcomes in minimising the risk of deforestation driven commodities entering into the EU market.

Conclusion 5:

ClientEarth's funding proposal demonstrates a significant commitment to advancing gender equality and empowering indigenous and local communities within forest governance. This commitment is strategically

⁷ This statement cuts across all geographies and the extent to which the project seems to have been implemented with limited engagement with other ongoing policy reform processes.

focused on embedding these principles within legal frameworks. However, the proposal reveals a gap in addressing specific needs of youth and people with disabilities, and it lacks detailed gender-disaggregated indicators that are essential for effective tracking and evaluation of the gender-related aspects of the project.

In practice, the project has undertaken comprehensive actions to improve the inclusion of women and IPLCs in target communities, highlighting ClientEarth's dedication to fostering inclusivity in forest governance. Despite these efforts, the project encounters challenges such as cultural barriers and the limited participation of certain groups, notably youth and people with disabilities. These challenges suggest a need for more nuanced and targeted interventions to address the specific needs and barriers faced by these groups. The findings reflect a scenario where, although significant strides have been made in certain areas of inclusivity, there remain critical segments of the community that require more focused attention to fully realize the project's goals of equitable and inclusive forest governance.

Conclusion 6:

The likelihood of the project's achievements continuing beyond its initial implementation period appears high, bolstered by substantial advancements in legal frameworks, local ownership through capacity building, and effective outreach and partnerships. Key successes include the significant shaping of legal frameworks in target geographies, such as Liberia and Gabon, and the EU. The project's focus on capacity building has fostered a sense of ownership and responsibility towards forest management among local communities.

However, the sustainability of these achievements faces potential constraints from various risks. Social sustainability risks include internal conflicts, mismanagement, and lack of transparency in community forest resources, which could undermine social cohesion. Economic and financial sustainability risks stem from dependencies on timber exploitation and payments from private sector operators, and reduced budgets in later project years pose a risk to the financial sustainability of the initiative. Institutional and political sustainability risks include political interference, staff turnover leading to institutional memory loss, and challenges in enforcing the EUDR regulation due to insufficient resources or weak governance structures. Changes in political leadership or priorities could also impact the enforcement and success of the regulation. Environmental risks related to deforestation, degradation, climate change, and biodiversity loss are central to the project's focus. These risks, along with the systemic nature of forest governance challenges, necessitate long-term efforts and strategic responses to ensure the continuation and amplification of the project's positive impacts.

4.2 Recommendations

A detailed description of the recommendations can be found in the executive summary. The following section presents a brief overview.

Capacity strengthening

Recommendation 1: Continue capacity strengthening building support to national and local stakeholders.

The MTR, therefore, recommends that CE should continue its capacity strengthening interventions, being flexible and responding to needs as they emerge. Considering the cross-cutting nature of the issues in project intervention areas, creating capacity building and training opportunities bringing together communities from different community forests, management boards, local leaders etc during the next phase of the project will not only achieve its objectives but also enhance the project's learning agenda as suggested in recommendation 7 below. The project team will have to be intentional in ensuring the participation of young men and young women and people with disabilities if identified in the target communities. This effort requires additional effort and budget, and consequently this should be built into future budgeting of the project.

Responsibility: ClientEarth and Partners

Duration: On-going

Gender and inclusiveness

Recommendation 2: Maintain and strengthen focus on gender, youth and people with disabilities.

It is recommended that the project:

- builds on the enthusiasm of the trained women to learn about methods to include women in community forest governance. These trainings should be extended to include the election process and to empower them to express themselves in public forums
- works with men, including community leaders and husbands, to increase understanding of women's role in forest governance
- seeks inputs and collaboration from relevant stakeholders, such as the Liberia Land Authority and the Forestry Development Authority, to strengthen the Women's Charter.
- takes a stronger gender transformative approach to the project
- explores practical ways for the greater engagement of young women and young men
- creates a network of women for forest governance to build a gender expertise in forest governance
- makes efforts to address the issue of illiteracy among women, through providing support for education and training that enables them to take up leadership roles within the community.

Responsibility: ClientEarth and Partners

Duration: On-going

Coherence

Recommendation 3: Develop a stakeholder engagement plan to strengthen coherence of interventions and maximise the project's value-added, outreach and impact.

The MTR recommends that the project develops a stakeholder engagement plan in each of its target geographies. This will include a mapping of stakeholders, their interests, motivations and the approaches for engagement. This will enable the project to identify potential allies, gate keepers, and other stakeholders that can impact the future of the project. Linked to recommendation 4 for instance, these could include donors, technical and other financial partners that can support ongoing livelihoods initiatives and others. This would also fit into the project's exit strategy proposed as part of recommendation 8.

Responsibility: ClientEarth and Partners

Duration: Within 6 months

Recommendation 4: Enhance responsiveness and alignment to emerging issues and relevant related ongoing forest governance, biodiversity conservation and climate processes in target countries.

The MTR recommends a rapid assessment of ongoing and emerging opportunities in target countries and identify options and opportunities for engagement. From the evaluation concerns about carbon markets, mining, land use planning, CAFI processes, the NDCs, Post 2022 biodiversity frameworks were identified. The MTR understands that budgets are limited and as such, a limited number of initiatives can be identified and resources and time allocated to engage in those processes.

Responsibility: ClientEarth and Partners

Duration: Within 6 months

Livelihoods

Recommendation 5: Strengthen livelihoods support to communities to maintain their motivation, engagement and commitment towards inclusive forest governance and biodiversity conservation.

MTR interviews highlighted the need to work with communities and help women and men improve their livelihoods and/or develop alternative, sustainable options if they are to give time to forest governance. *"We cannot ask communities to conserve their forests if they cannot meet their basic needs" (key informant interview).*

- It is recommended that the project explores ways in which funding and support could be provided to communities, for examples through consultancy or better placed partners to work with communities,

understanding the needs and the way forwards, which could include setting up cooperatives and other livelihoods options.

- Focus on market access is critical to ensure that as communities develop alternative income pathways, there are markets for their products for them to maintain motivation, engagement and commitment to reducing their own pressures on forests and biodiversity.

Responsibility: ClientEarth and Partners

Duration: On-going

EUDR Implementation

Recommendation 6: Maintain the multistakeholder focus on supporting EUDR implementation at EU and country levels.

The MTR recommends the following:

- Focus on strengthening existing relationships within the Brussels-based NGO coalition and building new relationships with national NGOs in strategic EU Member States as well as with civil society networks, and stakeholders in key producer countries not only to generate evidence on the implications of the EUDR on producer countries, but also on what capacity building and preparatory actions are needed.
- Further engage with Member States on the establishment and resourcing of their competent authorities.
- Conduct a rapid capacity needs assessment of key stakeholders in target countries and geographies, to ensure that its awareness raising and capacity building interventions respond to the real needs (towards achieving output 4.2 indicators).

Responsibility: ClientEarth and Partners

Duration: On-going

Monitoring, evaluation and learning

Recommendation 7: Update the project results framework to monitor, document and report on progress and achievements at the outcome level and emphasise learning.

The MTR recommends tracking more change-related indicators at output and outcome levels. This should also include process or qualitative indicators. The project should also ensure that relevant indicators are gender disaggregated and measures put in place to track progress over the last two years of the project.

The MTR recommends that the project team should carry out a mapping of products and materials developed and explore ways of making these materials available and accessible to partners. Additionally, facilitate opportunities for cross country learning and exchange of best practices. This will contribute to enhance the sustainability of the action in line with recommendation 8 below.

Responsibility: ClientEarth

Duration: Within 6 months

Sustainability

Recommendation 8: Develop an exit strategy to land the gains achieved and strengthen ownership and sustainability

The MTR proposed that the project develops an exit strategy for this phase of the programme building specific to each country context. CE needs to start discussions with partners to consolidate the achievements of the programme at all levels. The exit strategy and related discussions will also help to prepare partners for a scenario with or without future programme funding. Part of this process could include organising and providing training on resource mobilisation and funding proposal development for tropical country partners.

Responsibility: ClientEarth

Duration: Within 1 year

FOR Norad

Recommendation 9: Create a framework for project grantees to share experiences and knowledge.

The MTR revealed that there was mixed knowledge and understanding of other projects funded by Norad in the target implementation geographies. While it can be argued that grantees should proactively find out about other interventions in their spheres of intervention, the donor can also facilitate the process and create opportunities for learning and exchange for grantees and partners.

The MTR recommends that Norad's Civil Society Programme should organise an annual event of its grantees during which project grantees can share results and exchange best practices. These events could also be utilised to provide feedback to the donor and help shape future programme agendas.

Recommendation 10: Funding for phase 2 of the project

We strongly recommend that Norad continues its funding support for the programme beyond the current phase, addressing a wide spectrum of critical global challenges including climate change, deforestation, biodiversity loss, gender inequality, and the protection of Indigenous peoples' rights. This funding is indispensable in enhancing the voices of Indigenous Peoples and Local Communities (IPLCs) while improving their livelihoods. The programme serves as a powerful tool for IPLCs, addressing issues that are central to their well-being and rights and that are key in addressing the climate, water and biodiversity crises. It not only empowers IPLCs but also ensures their active participation in decision-making processes that affect their lives. This is crucial for achieving meaningful outcomes in areas like inclusive and sustainable forest governance, biodiversity conservation, gender equality, climate change.

The unique legal capacity-strengthening approach adopted by the current consortium means that it is exceptionally well-positioned to lead this process effectively. By continuing to support this initiative, NORAD can facilitate the consolidation of these achievements and enable the consortium to take a leadership role in addressing global challenges comprehensively, promoting the voice and livelihoods of indigenous peoples and local communities and supporting the Norwegian government to deliver on its national and international climate goals.

Responsibility: Norad

Duration: Post 2025

ANNEXES

ANNEX 1: TORS

ANNEX 2: LIST OF PARTICIPANTS (only available on request)

ANNEX 3: MTR EVALUATION MATRIX