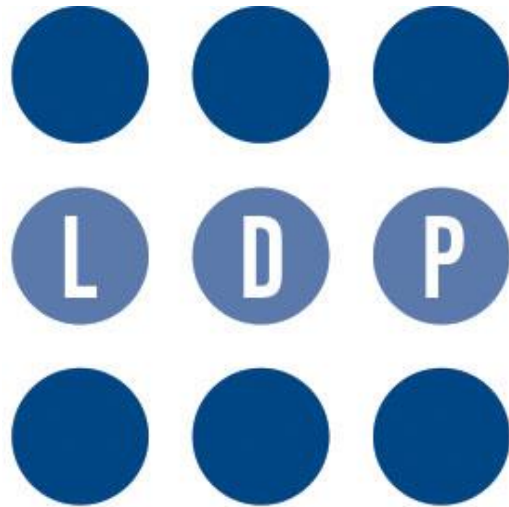


The Law & Development Partnership



Final Evaluation Report

Summative Evaluation of the
East Africa Customs and Freight
Forwarding Practicing Certificate
Training Programme (EACFFPC).

08 May 2015

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TradeMark East Africa

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Contents

Abbreviations	4
List of Figures and Tables	5
Executive Summary	6
Introduction.....	15
Background: TMEA and the EACFFPC project	15
Purpose of this evaluation.....	16
Evaluation approach	17
Guiding principles of our approach	17
Refinement of the EACFFPC results chain	18
Main evaluation questions	21
Methodology	23
Data collection methods.....	23
Sampling methods in data collection	25
Data collection challenges and constraints faced	31
Results.....	33
Impact.....	33
Effectiveness.....	42
Relevance.....	52
Sustainability	54
Efficiency.....	58
Conclusions and recommendations.....	64
Summary of key findings	64
Summary of lessons learned.....	72
Summary of recommendations.....	75
Annex A: Further analysis conducted post-evaluation.....	78
Annex B: EACFFPC summative evaluation plan	83
Annex C: Summary of project administrative data reviewed.....	90
Annex D: Expert analysis of EACFFPC curriculum and training material.....	94



Annex E: Overview of prepared semi-structured interview questions	100
Annex F: Survey questions issued to EACFFPC graduates	103
Annex G: Stories of change collection form used	104
Annex H: List of participants in semi-structured interviews	107
Annex I: Project documents reviewed during evaluation	109
Annex J: Terms of reference.....	112



Abbreviations

ABADT	Association Burundaise des Agences en Douane et Transitaires
ADR	Association des Agences en Douane du Rwanda
CA	Customs Agents
CC	Customs Clearing
CIC	Curriculum Implementation Committee
EAC	East African Community Secretariat
EACFFPC	East African Customs and Freight Forwarding Practicing Certificate Training project
FEAFFA	Federation of East African Freight Forwarders Associations
FF	Freight Forwarders
ITA	Institute of Tax Administration Tanzania
KESRA	Kenya Revenue Authority's School of Revenue Administration
KIFWA	Kenya International Freight Warehousing Association
KRA	Kenya Revenue Authority
LDP	Law & Development Partnership
MEL	Monitoring Evaluation and Learning
MSC	Stories of Most Significant Change
OBR	Office Burundaise des Recettes
RRA	Rwanda Revenue Authority
RRA Training	Rwanda Revenue Training School
TAFFA	Tanzania Freight Forwarders Association
TMEA	TradeMark East Africa
TRA	Tanzania Revenue Authority
UCIFA	Uganda Clearing Industry and Freight Forwarding Association
UFFA	Uganda Freight Forwarders Association
URA	Uganda Revenue Authority
URATS	Uganda Revenue Authority Training School
USAID	United States Agency for International Development
VfM	Value for Money



List of Figures and Tables

Figure 1	EACFFPC results chain during project implementation	17
Figure 2	EACFFPC refined results chain for purposes of evaluation	17
Figure 3	EACFFPC stakeholder analysis	24
Figure 4	Average release times (hours) in Rwanda over time	33
Figure 5	Time to export over time (World Bank Doing Business indicators)	34
Figure 6	Time to import over time (World Bank Doing Business indicators)	34
Figure 7	EACFFPC stories of most significant change	36
Table 1	Main evaluation questions for EACFFPC summative evaluation	19
Table 2	Number and average level of impact/ influence of EACFFPC stakeholders per country	26
Table 3	Prioritisation of target countries for data collection	26
Table 4	Sampling type per relevant data collection method	28
Table 5	Summary of previous TRS findings	32
Table 6	World Bank Doing Business Report 2015 - Trading Across Borders	33
Table 7	Reasons for selection of three most significant changes	37
Table 8	Summary of graduate perception survey results on effectiveness of EACFFPC training and certification	45
Table 9	Number of EACFFPC graduates over time (according to FEAFFA Monitoring Data)	57



Executive Summary

- 1.1 The Law & Development Partnership Limited (LDP), in association with Crown Agents Limited, has been contracted by TradeMark East Africa (TMEA) to conduct a summative evaluation of the East Africa Customs and Freight Forwarding Practicing Certificate Training project (EACFFPC).

Background: TMEA and the EACFFPC project

- 1.2 Since 2011, TMEA has been working closely with the Federation of East African Freight Forwarders Associations (FEAFFA) and the revenue authorities of the five East African Community (EAC) Member States to further develop and roll out the East Africa Customs and Freight Forwarding Practicing Certificate Training project (EACFFPC). The EACFFPC is a training course and certification for freight forwarders and clearing agents, both practicing and aspiring, in the EAC.
- 1.3 The EACFFPC is one initiative under TMEA's third strategic objective area of "Improved Business Competitiveness". The EACFFPC programme contributes to one of the strategic outcomes which underpins the strategic objective area, namely that of "efficient trade logistics services". The results logic underpinning the EACFFPC project is that trained clearing agents and freight forwarders will apply that learning and in turn help to make the logistics services in the region more efficient and effective.

Purpose of this evaluation

- 1.4 The stated purposes of this evaluation include: learning from experience to date in order to shape a possible second phase of support to FEAFFA and TMEA's future programming more generally (i.e. "lesson learning"); and demonstrating results to TMEA's investors and EACFFPC stakeholders (i.e. "accountability").
- 1.5 It was clear from the inception phase consultations that of these two categories of purpose, "lesson learning" is viewed as the pre-eminent purpose of this evaluation for both TMEA and FEAFFA. It is important to note, however, that the other eminent purpose of investigating results to address accountability to investors and stakeholders has also been factored into the evaluation approach and methodology

Guiding principles of our approach

- 1.6 The guiding principles of our approach to this evaluation include:

- Ensure evaluation is framed within TMEA's Monitoring, Evaluation and Learning (MEL) approach and around the OECD DAC evaluation criteria
- Use of a range of 'mixed methods' for evaluative enquiry and analysis and triangulation of data for increased validity and deeper understanding
- Evaluation should be constructive, practical and useful for TMEA, FEAFFA and EACFFPC stakeholders



- Focus on evaluating value for money (VFM)
- Close engagement throughout with TMEA results team, trade logistics team, and key stakeholders such as FEAFFA.
- Ensure sufficient focus on key cross-cutting issues such as gender, youth, other specific groups, and climate change.

Refinement of the results chain

1.7 The results chain of the given project is a critical foundation for any evaluation, as it provides the evaluator with a guide to navigate the expected framework of results and in turn orientate the evaluation plan, data collection methods, and data analysis. The EACFFPC results chain was developed by TMEA and FEAFFA in August 2012. Based on our review of the results chain during the inception phase, undertaken in collaboration with TMEA and FEAFFA, the results chain has been refined to some extent in order to better orientate this evaluation.

Main evaluation questions

1.8 Having investigated and agreed the primary purpose of this evaluation, outlined the guiding principles of the approach, and refined the EACFFPC project results chain, the next step was to review the main evaluation questions in light of the agreed purpose and refined results chain, which resulted in a consolidation and prioritisation of the evaluation questions. These consolidated and prioritised evaluation questions, set out against the five OECD DAC criteria, and forming the spine of the evaluation plan, are as follows:

Table 1: Main evaluation questions for EACFFPC summative evaluation

Evaluation criterion	Evaluation questions
Impact	1. What was the intervention’s measurable impact on a more effective logistics sector? To what extent can identified changes be attributed to the intervention? What would have occurred without the intervention?
Effectiveness	2. To what extent was the objective of a higher standard of services across the freight forwarding industry in East Africa met? 3. How far were the intended outcomes and outputs achieved? 4. If gender mainstreaming targets were set at project inception, to what extent were targets achieved, and what were the successes and challenges?
Relevance	5. Does this project address the main challenges in the effectiveness of the logistics sector in East Africa?
Sustainability	6. What benefits (institutional, technical, financial, economic, gender equality) are likely to continue beyond the life of the project, even without TMEA? 7. What are the lessons learned regarding sustainability?
Efficiency	8. To what extent and how has the intervention been effective and achieved good VFM?



Methodology

1.9 In attempting to answer the evaluation question we deployed a “mixed methods” approach. This involved a range of different evaluative methods and tools, with subsequent triangulation of the data collected. This mixed methods approach offered the best opportunity to develop as rich a set of answers as possible to the evaluation questions being asked within the resource parameters of this evaluation.

1.10 The data collection methods deployed included:

- **Perception survey of EACFFPC graduates:** This was an online survey consisting of seven questions aimed at eliciting quantitative responses from EACFFPC graduates.
- **Stories of Most Significant Change (MSC):** This involved collecting stories of significant change from individual EACFFPC graduates, from which there was a systematic selection of the *most* significant of these stories of change.
- **Semi-structured interviews** with EACFFPC graduates, revenue authorities, national freight forwarding associations, FEAFFA, and TMEA.
- **Rapid reviews of previous quantitative studies:** The first review is of a set of studies on cargo clearance and/or release times in East Africa. The second rapid review is of a previous study which investigated possible links between the number of customs declaration errors made by clearing agents and/or the time taken for particular clearing agents to have their cargoes cleared at the border and whether the clearing agents have been trained under EACFFPC or not.
- **Expert analysis of the EACFFPC training curriculum and materials:** This method involves undertaking an ‘expert’ or ‘technical’ review of the training curriculum and materials with a view to producing qualitative evidence on, among other things, the relevance and quality of the training and certification.
- **Analysis of project administrative data:** This data collection method focuses on collecting and analysing the project administrative data or, in other words, the project’s monitoring data.

1.11 Four of these six methods applied to all five countries of the EAC, but given the resource parameters of this evaluation (elapsed time and financial) it was not possible to hold semi-structured interviews and collect stories of change in all five countries. Tanzania and Kenya were selected on the basis of a ranking of countries with Rwanda added to ensure that the landlocked countries in the EAC were represented in the interviews and stories of change data collection.

1.12 A key concern noted during inception consultations was the potentially serious and significant limitations in the range and depth of readily available data for this evaluation. This concern was, to a large extent, justified during the data collection and analysis stages of the evaluation. These data limitations had a serious constraining effect on this evaluation both in terms of the level and range of evaluative inquiry that was possible and also in terms of the robustness and reliability of some findings. Examples of data gaps include: consistent and clear data on the number of people enrolled on, dropped out of, failed or graduated from the EACFFPC training; completed training feedback forms from all EACFFPC trainees; the names and contact details of all EACFFPC trainees, etc.



Results

1.13 The summary below summarises the overall assessment of the project according to the evaluation criteria. We provide each criteria with an overall assessment using a scale of 1 (poor) to 5 (excellent). We also provide a confidence level (low, medium or high) outlining the available level of evidence to support the team’s assessment.

Criteria	Assessment (1 to 5)	Confidence level	Comment
Impact	4	Medium	<ul style="list-style-type: none"> Stories of change show trained forwarders / clearing agents have experienced a strong positive impact in improving quality, timeliness and cost of their services. EACFFPC graduates surveyed believe training has allowed them to offer a faster and lower cost service to their clients (i.e. importers / exporters). A review of previous studies shows a downward trend in the time taken for goods to be cleared / released at border points in the region in recent years, and that firms employing EACFFPC graduates appear to make fewer errors in clearing goods. Triangulating the qualitative and quantitative evidence available indicates a strong positive impact. However, more data (quantitative in particular) on extent to which the EACFFPC training has positively impacted on the cost and time for importers / exporters to trade goods across borders would strengthen the evidence base.
Effectiveness	3	Medium	<ul style="list-style-type: none"> Revenue authorities and EACFFPC graduates interviewed are unanimously positive about significant improvements in standard of clearing/forwarding services 100% of EACFFPC graduates surveyed said training provided them with new and/or improved knowledge and skills The project has reached over 90% of the target of 4,500 freight forwarders/ clearing agents trained. However, quality and reliability of monitoring data around numbers of men and women trained is weak. The obligatory licensing requirement for forwarding / clearing firms to be EACFFPC certified, and extent to which the policy is implemented, varies across EAC. Practicalities and political realities of the policy appear prohibitively complex. Gender mainstreaming has not been sufficiently considered in the project. Some evidence of unequal access to EACFFPC training for women was found. Analysing the project monitoring data should have allowed for clear assessment of progress against certain intended outcomes. This has not always been the case because of incoherence and inconsistencies in monitoring data.
Relevance	4	High	<ul style="list-style-type: none"> All stakeholders (i.e. TMEA, FEAFFA, national freight forwarding associations, revenue authorities) and majority of beneficiaries interviewed (i.e. EACFFPC graduates) believe increasing the standard of services of clearing / forwarding agents will increase efficiency and effectiveness of logistics sector in East Africa. Forwarding and clearing agents believe training has improved the standard of their service delivery, and their higher standard of service is contributing to reduced clearance times and associated costs to traders. Survey results indicate that training was relevant to the requirements of forwarding and clearing agents.

Criteria	Assessment (1 to 5)	Confidence level	Comment
			<ul style="list-style-type: none"> • Currently, the emphasis of the curriculum and training materials is on customs to the detriment of important freight forwarding knowledge and skills. • There is little or no evidence of sufficient ongoing monitoring, evaluation and learning within the project. This will have negatively affected the project implementation team’s ability to ensure the ongoing relevance of the project.
Sustainability	3	High	<ul style="list-style-type: none"> • TMEA funding for EACFFPC ended in 2014, however, training is continuing without TMEA funding. This finding alone indicates a level of sustainability of the project. However, this picture is varied across the region. • Despite its lead role in setting up and coordinating the EACFFPC, FEAFFA does not, as yet, generate sustainable revenue from the EACFFPC. • Similar financial sustainability concerns are present among the national freight forwarding associations, with the exception of ADR in Rwanda. • There is tension around the future ‘ownership’ or lead responsibility for delivering the EACFFPC (between national associations and revenue authorities). This will need to be proactively addressed in the coming months and years.
Efficiency	2	Medium	<ul style="list-style-type: none"> • Some evidence has been identified that brings into question the efficiency of this project, including: <ul style="list-style-type: none"> ➢ The TMEA spend per EACFFPC graduate is estimated at over US\$ 800. The course fee paid by trainees in Kenya is approximately US\$ 636 and US\$ 465 respectively. Taken together, these figures suggest TMEA has heavily subsidised the real cost of EACFFPC training and certification per EACFFPC graduate. ➢ While key project activities funded by TMEA were, overall, delivered in a timely manner, the EACFFPC project has had a diffuse and complex implementation network which has created some operational inefficiencies. ➢ There does not appear to have been a systematic management of risk in the project. ➢ Project monitoring and reporting was largely activity focused in nature, lacking sufficient focus on outcomes. Data management, both planning and execution, was inadequate throughout the project. • It has not been possible to evaluate the extent to which the EACFFPC represents VFM to TMEA, because: <ul style="list-style-type: none"> ➢ No clear budget information has been provided and no tracking of VFM economy savings has been undertaken throughout the project; ➢ It has not been possible to assess whether the TMEA spend per EACFFPC graduate represents VFM from an efficiency or effectiveness perspective because of a lack of available data such as: a breakdown of TMEA spend per project activity / outcome; project data on VFM efficiency metrics; lack of data on the scale of time / cost savings enjoyed by traders as a result of EACFFPC training. <p>NOTE: The lack of clear and detailed financial information raises concerns around VFM. We recommend that TMEA undertakes an investigation into financial management of this project. This may, in time, make it possible to better assess VFM.</p>



1.14 This evaluation has produced **25 key findings, 10 lessons learned, and 10 recommendations.**
The key findings are as follows:

Evaluation criterion	Key findings
Impact	<p>FINDING 1: The EACFFPC appears to be having a positive impact on the service standards of freight forwarders and clearing agents, which is taking place in the context of falling clearance and release times in the region.</p>
Effectiveness	<p>FINDING 2: Evidence gathered supports a conclusion that the objective to achieve a higher standard of services across the freight forwarding industry in East Africa has been met to some extent by the EACFFPC training and certification initiative.</p> <p>FINDING 3: According to the most complete data set, the outcome of a “critical mass” of freight forwarders and clearing agents trained has almost been achieved.</p> <p>FINDING 4: Evidence indicates that freight forwarders and clearing agents trained are acquiring new and/or improved knowledge and skills and applying this in their work.</p> <p>FINDING 5: The policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms is being applied inconsistently across the region</p> <p>FINDING 6: The policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms is complex and difficult to implement</p> <p>FINDING 7: The policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms may, in some countries, prove to be a barrier to competition in the training market</p> <p>FINDING 8: Little evidence has been found that the policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms is driving demand for EACFFPC training, as was anticipated.</p> <p>FINDING 9: No gender mainstreaming targets or indicators have been set or tracked throughout the project, although there has been a recognition that gender needed to be mainstreamed in the project.</p> <p>FINDING 10: Some evidence of unequal access for women to the EACFFPC training was found from the semi-structured interviews with graduates.</p>
Relevance	<p>FINDING 11: Project design could have been more evidence-based to ensure relevance of the intervention</p> <p>FINDING 12: All project stakeholders interviewed believe that increasing the standard of services of clearing and forwarding agents in the region is likely to increase the efficiency and effectiveness of the logistics sector in East Africa.</p> <p>FINDING 13: Results of a survey of EACFFPC graduates indicates that the training was relevant to their professional development requirements. 100% of respondents saying the training provided them with new and/or improved</p>



Evaluation criterion	Key findings
	<p>knowledge and skills, over 80% saying the training was regularly useful to them in their jobs, and over 80% of respondents saying it has helped them to provide quicker and lower cost services to their clients</p> <p>FINDING 14: Currently, the emphasis of the curriculum and training materials, in relation to time allocation, is on customs to the detriment of important freight forwarding knowledge and skills which are essential in relation to EAC traders realising export potential /competitiveness and controlling the cost of imports.</p> <p>FINDING 15: There is little evidence of a sufficient focus on ongoing monitoring, evaluation and learning, with a view to feeding this information into project decision-making.</p>
Sustainability	<p>FINDING 16: There has been some success in terms of the sustainability of the project, although this picture of sustainability is varied across the region.</p> <p>FINDING 17: There have been benefits in terms of sustainability for individual institutions involved in the EACFFPC project. For example, the EACFFPC has helped to increase membership base of some national freight forwarding associations; and training the private sector has helped national revenue authority training centres to diversify their income base.</p> <p>FINDING 18: A serious financial sustainability concern has been identified with regard to some of these institutions and their role in the EACFFPC training and certification network, namely FEAFFA and the some of the national training institutions</p> <p>FINDING 19: There is an unhelpful tension around the future of ‘ownership’ or lead responsibility for delivering the EACFFPC among key stakeholders, which is something that will need to be proactively addressed in the coming months and years.</p>
Efficiency	<p>FINDING 20: The EACFFPC project results chain requires greater logical coherence and clarity</p> <p>FINDING 21: Project monitoring and reporting was largely activity focused in nature, lacking sufficient focus on project outcomes. Data management, both planning and execution, was inadequate throughout the project.</p> <p>FINDING 22: TMEA has helped to train an estimated 2,373 freight forwarders and clearing agents during the period of its funding. This equates to an average of 678 graduates per year under TMEA funding compared to 367 graduates per year before TMEA funding began.</p> <p>FINDING 23: Key project activities funded by TMEA were, overall, delivered in a timely manner.</p> <p>FINDING 24: The EACFFPC project has had a relatively diffuse and complex training implementation network which has been effective in some ways but has also created inefficiencies and risks around sustainability</p> <p>FINDING 25: There has not been suitable, systematic management of risk in the project.</p>



1.15 The lessons learned and recommendations are as follows:

Lessons learned
LESSON 1: Project design efforts should ensure a results chain that is as logically coherent and clear as possible.
LESSON 2: Project scoping and design should be evidence-based wherever possible.
LESSON 3: Alternative project delivery mechanisms should be considered as a matter of course at project design stage to ensure interventions approaches are justified on factors such as relevance, sustainability, and VFM relative to other possible project approaches (in the case of this project other delivery mechanisms / approaches could include the training and certification being delivered by private sector training companies, or by national freight forwarding associations).
LESSON 4: Monitoring plans should be complete with baselines, indicators and targets that can be used to monitor anticipated results. The monitoring plan then needs to be updated on a regular basis throughout programme delivery.
LESSON 5: Project monitoring requires effective data collection and management underpinned by sound project monitoring planning (including sufficient budget for effective data collection and management).
LESSON 6: Monitoring, evaluation and learning (MEL) should be embedded into ongoing project management to support improved project performance and risk management
LESSON 7: Project risks need to be systematically identified, mitigated and monitored throughout project delivery.
LESSON 8: Gender mainstreaming requires more than disaggregation of monitoring data by gender e.g. to rigorously and systematically assess the (expected and unexpected) implications from a gender perspective of planned, ongoing and completed project activities.
LESSON 9: TMEA's support to national or regional policy changes, such as the one around licencing of forwarding and clearing firms in this project, should be on the basis of sound research around costs and benefits of the policy change
LESSON 10: Effective evaluation planning is crucial in ensuring TMEA gets the most value from the evaluations of its project portfolio. Sound evaluation planning includes, among other things: a well prepared terms of reference which contains a carefully calibrated set of main questions formulated both to align with the evaluation criteria and the practical parameters of the evaluation context; setting aside sufficient elapsed time for data collection, analysis and write-up; and the project team to have a complete and organised set of monitoring data ready for evaluation teams to review.
Recommendations
RECOMMENDATION 1: If TMEA wishes to further investigate the impact of the EACFFPC training we recommend a detailed follow up study into whether there is a causal link between the number of customs declaration errors made by trained agents versus untrained agents and the extent to which this link translates into time / cost savings for traders. (This was not possible because of the inability to gather relevant data from the revenue authorities within the elapsed timeframe of this evaluation).
RECOMMENDATION 2: Any future TMEA support to the EACFFPC project should be contingent upon the results of a detailed and robust verification of trainee and graduate numbers in each country against stated results



RECOMMENDATION 3: Any next phase of TMEA support to the EACFFPC project should begin with a participatory definition of the project's theory of change from which a refined project results chain would be developed.

RECOMMENDATION 4: A detailed review of alternative delivery models for the EACFFPC training and certification should be undertaken such as the training and certification being delivered by private sector training companies, or by national freight forwarding associations). This should take account of the need to rebalance the training curriculum to ensure appropriate coverage of freight forwarding knowledge and skills (see recommendation 5), the serious tensions between some national freight forwarding associations and revenue authorities over leadership and ownership, as well as the challenges to sustainability.

RECOMMENDATION 5: The EACFFPC curriculum and training materials should be revised and developed to ensure appropriate balance in coverage between freight forwarding and customs subject matter.

RECOMMENDATION 6: A pragmatic review (perhaps a political economy analysis or cost-benefit analysis) of the policy change around obligatory certification for licensing of forwarding and clearing firms should be considered.

RECOMMENDATION 7: Project monitoring in future should be at the output to outcome level as well as the activity level

RECOMMENDATION 8: The EACFFPC project should introduce project feedback forms for trainees as an essential requirement and these forms should be captured electronically to support project monitoring, evaluation and learning.

RECOMMENDATION 9: Any future support from TMEA to this project should be contingent on development and implementation of plans around more effective gender mainstreaming in the project

RECOMMENDATION 10: A project risk register should be established for this project, identifying and tracking risks at all levels of the project.



Introduction

- 2.1 The Law & Development Partnership Limited (LDP), in association with Crown Agents Limited, has been contracted by TradeMark East Africa (TMEA) to conduct a summative evaluation of the East Africa Customs and Freight Forwarding Practicing Certificate Training project (EACFFPC).

Background: TMEA and the EACFFPC project

- 2.2 Since 2011, TMEA has been working closely with the Federation of East African Freight Forwarders Associations (FEAFFA) and the revenue authorities of the five East African Community (EAC) Member States to further develop and roll out the East Africa Customs and Freight Forwarding Practicing Certificate Training project (EACFFPC). The EACFFPC is a training course and certification for freight forwarders and clearing agents, both practicing and aspiring, in the EAC.
- 2.3 The EACFFPC has been running for a number of years (funded by USAID and other project stakeholder organisations from 2007 and then by TMEA from 2011). In this time the project reportedly trained and certified some 1,650 individuals¹. A key target for TMEA's support to the EACFFPC was to raise this number of certified practitioners to 4,500.
- 2.4 The EACFFPC is one initiative under TMEA's third strategic objective area of "Improved Business Competitiveness". Approximately 15% of TMEA's budget supports improved business competitiveness as a key building block for increased trade. TMEA seeks to improve business competitiveness in East Africa through enhancing business regulations for trade, improving export capability and developing efficient trade logistics services.
- 2.5 The EACFFPC programme contributes to the strategic outcome of "efficient trade logistics services". The propositions underpinning TMEA's theory of change (or strategy) state that:

In a recent study, estimates for Kenya, Tanzania and Uganda placed the average cost of trade logistics services at the equivalent of a tax of between 25 and 40% on value added². It has been posited that improving logistics performance and facilitating trade can increase trade impacts of lowering remaining border barriers by a factor of two or more.³

Particular constraints relating to transport logistics services resulting in high costs include fragmented logistics services, transport cartels, small markets that cannot capture economies of scale, and NTBs including road blocks along major intraregional corridors. Smaller companies that dominate the freight logistics market (in terms of numbers) in East Africa are characterised by their weak technical capacity and lack of professional skills.

- 2.6 The results logic underpinning the EACFFPC project is that trained clearing agents and freight forwarders will apply that learning and in turn help to make the logistics services in the region

¹ Based on the author's calculations using available project administrative data.

² ATPC Briefing, No 16, Economic Commission for Africa, ATPC, African U.S. Trade in the Spotlight: A Decade of AGOA

³ Trade Policy, Trade Costs, and Developing Country Trade *Bernard Hoekman, Alessandro Nicita*



more efficient and effective, which will contribute to the development of “agile, lean and efficient supply chains through seamless trade facilitation systems and services... bring(ing) significant benefits to firms (and) help(ing) boost competitiveness and increase export potential”.

Purpose of this evaluation

- 2.7 During the inception phase consultations for this evaluation - which included consultations with TMEA (including TMEA results team, TMEA’s EACFFPC project team, and senior personnel from TMEA’s ‘increased business competitiveness’ strategic objective area) and FEAFFA – the primary purpose for this evaluation was investigated.
- 2.8 TMEA and FEAFFA cited various objectives for this evaluation. In broad terms these objectives fell under two categories of purpose:
- Learning from experience to date in order to shape a possible second phase of support to FEAFFA and TMEA’s future programming more generally (i.e. “lesson learning”); and
 - Demonstrating results to TMEA’s investors and EACFFPC stakeholders (i.e. “accountability”).
- 2.9 These dual objectives are also reflected in the terms of reference for this evaluation. However, we felt it important to investigate during inception consultations which of these objectives was viewed as most important in the context of this evaluation. It was clear from the inception phase consultations that of these two categories of purpose, “lesson learning” is viewed as the pre-eminent purpose of this evaluation for both TMEA and FEAFFA.
- 2.10 It is important to note, however, that the other eminent purpose of investigating results to address accountability to investors and stakeholders has also been factored into the evaluation approach and methodology. Indeed, it is worth noting that investigating results and determining what impact the project has achieved is, to some extent, a prerequisite for effective lesson learning.



Evaluation approach

3.1 This section of the report outlines: the guiding principles of our evaluation approach; the refined EACFFPC results chain which forms the foundation of the evaluation and the rationale for our refinement of the results chain; and the prioritised evaluation questions which have guided the data collection and analysis.

Guiding principles of our approach

3.2 Our technical approach to this summative evaluation has been based around the following guiding principles:

Key guiding principles of our approach	<p><i>Ensure evaluation is framed within TMEA’s Monitoring, Evaluation and Learning (MEL) approach and around the OECD DAC evaluation criteria</i></p> <p>We have followed TMEA’s guidelines on evaluations contained in the TMEA MEL approach paper, ensuring that TMEA’s expectations and standards for evaluations are achieved.</p>
	<p><i>Use of a range of ‘mixed methods’ for evaluative enquiry and analysis and triangulation of data for increased validity and deeper understanding</i></p> <p><i>We felt it was crucial in the context of this evaluation that a range or mixture of methods were used to ensure sufficiently high levels of validity and depth of understanding. We used various evaluative methods including surveys, most significant stories of change, expert analysis, semi-structured interviews, and analysis of administrative data, and we looked to triangulate data wherever possible.</i></p>
	<p><i>Evaluation should be constructive, practical and useful for TMEA, FEAFFA and EACFFPC stakeholders</i></p> <p>It is, of course, important for the evaluation to focus on testing the theoretical logic of the EACFFPC programme results framework and the extent to which results have been realised. However, it is critically important that this evaluation is as practical, constructive and useful as possible so that lessons can be fed back into ongoing and future TMEA programmes.</p> <p>We have therefore been sure to examine key operational aspects e.g. the project design process, the management and resourcing of the project, capacity of beneficiary organisations, etc. to identify practical lessons and examples of good practice.</p> <p>These lessons are particularly important as TMEA progresses toward completion of the current 2010-2016 strategy and phase 1 of programming, and begins to plan for the post-2016 strategy and phase 2 of TMEA activities.</p>
	<p><i>Focus on evaluating VFM, based on TMEA’s VFM criterion and the 3Es of VFM :</i></p> <ul style="list-style-type: none"> • <i>Economy</i> - careful use of resources to save expense, time or effort. • <i>Efficiency</i> - delivering the same level of service for less cost, time or effort. • <i>Effectiveness</i> - delivering a better service or getting a better return for the same amount of expense, time or effort.
	<p><i>Close engagement throughout with TMEA results team, trade logistics team, and key stakeholders such as FEAFFA.</i></p>



	<p>It was crucial to have close and constructive communication with key programme stakeholders throughout the evaluation, not only to ensure effective and timely data collection but also to ensure all practical and useful lessons are identified and captured.</p>
	<p><i>Ensure sufficient focus on key cross-cutting issues such as gender, youth, other specific groups, and climate change.</i></p> <p>It is very important that key cross-cutting issues, like mainstreaming of gender and climate change, are examined as part of the evaluation wherever reasonably possible.</p>

Refinement of the EACFFPC results chain

- 3.3 The results chain of the given project is a critical foundation for any evaluation, as it provides the evaluator with a guide to navigate the expected framework of results and in turn orientate the evaluation plan, data collection methods, and data analysis.
- 3.4 The EACFFPC results chain was developed by TMEA and FEAFFA in August 2012. Based on our review of the results chain during the inception phase, undertaken in collaboration with TMEA and FEAFFA, the results chain has been refined to some extent in order to better orientate this evaluation.
- 3.5 As discussed with TMEA during the inception phase, this refinement process has not changed the original project results chain. This refinement process clarifies the intended logic in the original results chain for the purposes of optimally guiding the evaluation. This refinement process does not make any material changes to the underpinning results logic but attempts to clarify that underpinning logic. In order to undertake an effective evaluation, it is crucial that the evaluation is underpinned by a results chain that is as coherent in its logic as possible. Any improvements to the logical coherence and clarity of the project results chain will follow through to improved coherence and clarity in the evaluation.
- 3.6 Refinements have been made with the participation and agreement of TMEA and FEAFFA, who have confirmed during inception consultations that the refinements to the results chain do reflect the intended logic of the project and its place within TMEA's corporate results framework.

Figure 1: EACFFPC results chain during project implementation

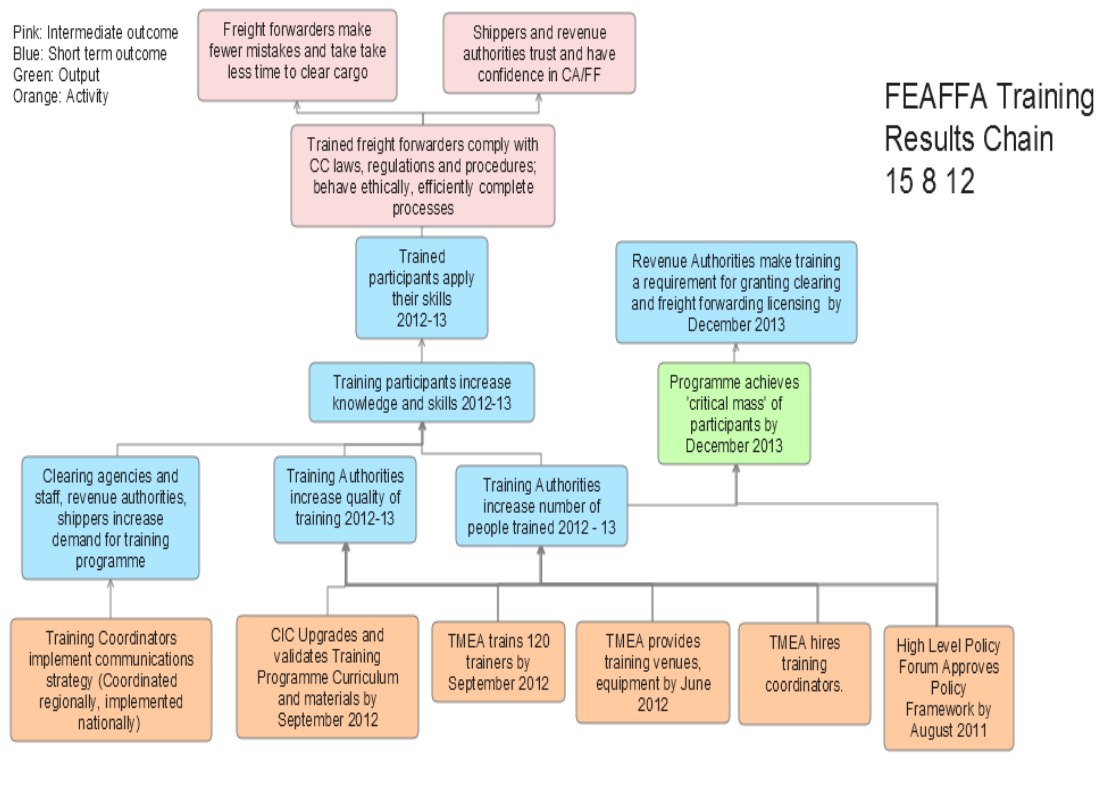
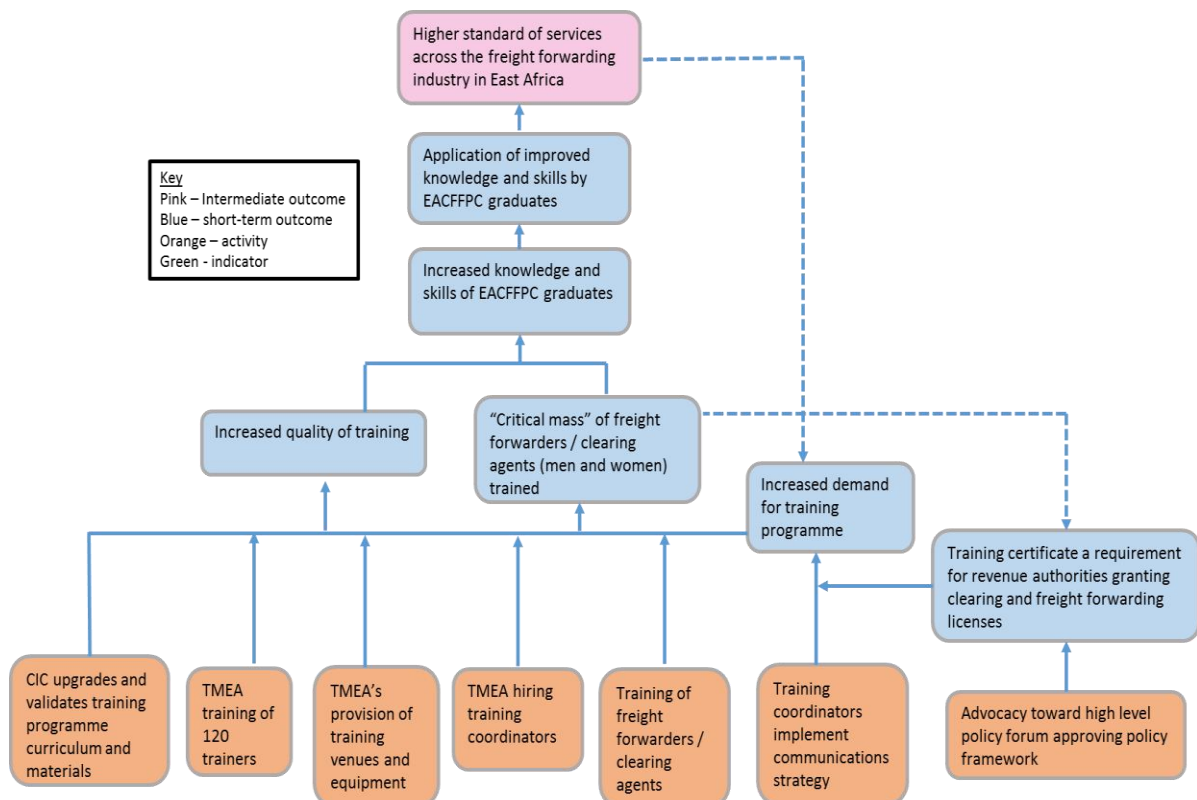


Figure 2: EACFFPC refined results chain for purposes of evaluation





3.7 The refinements to the original results chain can be seen in the comparison between figures 1 and figure 2 above. These refinements include the following:

- **Rationalisation of three separate intermediate outcomes into one.** This rationalisation was in recognition that the three existing intermediate outcomes were either indicators (e.g. “freight forwarders make fewer mistakes” and “shippers authorities trust and have confidence in CA/FF”) or definitions (e.g. “trained freight forwarders comply with CC laws, regulations, and procedures, behave ethically, efficiently complete processes”) of one single outcome i.e. “higher standard of services across the freight forwarding industry in East Africa”.
- **Pushing reduced clearance times back up the TMEA corporate results chain:** One of the intermediate outcomes in the original results chain contained the words, “freight forwarders... take less time to clear cargo”. In our view, reduced clearance times is an outcome (or an indicator) that belongs higher up the TMEA corporate results chain.

The EACFFPC logic is linked to the TMEA theory of change through its contribution to “more effective and innovative logistics services”. Increased standard of freight forwarding services may contribute to more effective and innovative logistics services, which in turn may contribute to reduced clearance times along with a range of other determining factors, many of which are the focus of other TMEA projects (e.g. more efficient customs procedures).

As described later in this report, we have attempted to look for evidence of reduced clearance times and cost savings associated with the EACFFPC project. However, we have not undertaken a higher level study into the determinants of clearance times or investigated whether there is statistically significant causality between freight forwarders and clearing agents trained and reduced clearance times in the region over time⁴.

- **Linking obligatory certification into the logical flow of the results chain:** One of the short-term outcomes of this project is a regional policy change leading to EACFFPC training and certification (or equivalence to the EACFFPC) becoming an obligatory requirement for revenue authorities’ licencing of freight forwarding companies. In the original results chain, this short term outcome was not feeding in to any higher level intermediate outcome. From discussions with TMEA and FEAFFA, it is clear that this obligatory certification was viewed as a way to a) increase demand for the training and b) provide a structural framework for the sustainability of the EACFFPC. The refined results chain shows the obligatory certification as a contributor to increased demand for training. A dotted line is also drawn from the

⁴ The reason for this is twofold: 1) This sort of impact study is one that would best be done, in our view, as an investigation into impact at a higher level of TMEA’s corporate results framework (e.g. strategic objective level) as the determinants of clearance times are being addressed by multiple TMEA interventions across TMEA’s three strategic objective areas and it would be much more efficient to analyse the collective impact of TMEA’s interventions on clearance times rather than at an individual project level; and 2) there are insufficient resources (elapsed time and financial) available in this evaluation to undertake this sort of study alongside all other required evaluative inquiry.



intermediate outcome back down to increased demand for training, to capture the idea that increasing standards in the industry will also contribute to an increasing demand for training.

- **Removal of “critical mass” output:** The output of a “critical mass” of freight forwarders trained is, in our view, actually a target for the “increased number of people trained” outcome, and so we have merged the two. The reason this was a separate output in the original results chain was because reaching this “critical mass” of freight forwarders trained was the agreed trigger point for revenue authorities to implement the obligatory certification policy. This is now captured by a dotted arrow in the revised results chain.
- **Activity of policy advocacy work made explicit:** This was to capture the significant efforts required to achieve a regulatory change such as the one envisaged in the obligatory certification short-term outcome in this project.
- **Simplification of results chain:** Where possible, the wording of activities and outcomes have been simplified, with the tenses amended where suitable.

Main evaluation questions

3.8 Having investigated and agreed the primary purpose of this evaluation, outlined the guiding principles of the approach, and refined the EACFFPC project results chain, the next step was to review the main evaluation questions to be posed, as per the terms of reference for this evaluation. We have reviewed the questions in light of the agreed purpose and refined results chain, which resulted in a consolidation and prioritisation of the evaluation questions.

3.9 These consolidated and prioritised evaluation questions, which formed the spine of the evaluation plan, are as follows:

Table 1: Main evaluation questions for EACFFPC summative evaluation

Evaluation criterion	Evaluation questions
Impact	<ol style="list-style-type: none"> 1. What was the intervention’s measurable impact on a more effective logistics sector? To what extent can identified changes be attributed to the intervention? What would have occurred without the intervention?
Effectiveness	<ol style="list-style-type: none"> 2. To what extent was the objective of a higher standard of services across the freight forwarding industry in East Africa met? 3. How far were the intended outcomes and outputs achieved? 4. If gender mainstreaming targets were set at project inception, to what extent were targets achieved, and what were the successes and challenges?
Relevance	<ol style="list-style-type: none"> 5. Does this project address the main challenges in the effectiveness of the logistics sector in East Africa?



Sustainability	<p>6. What benefits (institutional, technical, financial, economic, gender equality) are likely to continue beyond the life of the project, even without TMEA?</p> <p>7. What are the lessons learned regarding sustainability?</p>
Efficiency	<p>8. To what extent and how has the intervention been effective and achieved good VFM?</p>

3.10 The full evaluation plan for this summative evaluation can be found in Annex B of this report.



Methodology

- 4.1 This section of the report outlines: the data collection methods used and reflections on why they were selected; an overview of the sampling methods used during data collection; and a summary of data collection challenges and constraints faced.

Data collection methods

- 4.2 In attempting to answer the evaluation questions set out against the five OECD-DAC criteria, we deployed a “mixed methods” approach. This involved a range of different evaluative methods and tools, with subsequent triangulation of the data collected. This mixed methods approach offered the best opportunity to develop as rich a set of answers as possible to the evaluation questions being asked within the resource parameters of this evaluation. Using multiple data collection methods, qualitative and quantitative, supported by data triangulation was also important in this particular evaluation because of the challenges faced around the extent and quality of existing project data readily available to the evaluation team.

- 4.3 The data collection methods we deployed are summarised below.

- **Perception survey of EACFFPC graduates:** This was an online survey consisting of seven questions aimed at eliciting quantitative responses from EACFFPC graduates. This survey affords us the opportunity to collect data that is reliable and comparable. The graduates surveyed were given a window of two weeks in which to respond to the questions posed. The survey was issued in English and French, as required. A full summary of the questions posed can be seen in Annex F while the results of the survey can be seen in the results section of this report.
- **Stories of Most Significant Change (MSC):** This involved collecting stories of significant change from individual EACFFPC graduates, from which there was a systematic selection of the *most* significant of these stories of change. The stories from graduates focussed on changes that have taken place for them as individuals, or for their firm, directly as a result of the EACFFPC training and certification. The selection of most significant stories of change began with the graduate’s own selection of *most* significant change from the number of different changes the graduate cited as having occurred. The selection continued through a panel of key project stakeholders (i.e. TMEA and FEAFFA) who assembled to select, from all of the stories collected, the three stories of most significant change and to discuss the reasons why these changes were selected as *most* significant.

This ‘stories of change’ data collection method is a robust qualitative data collection method used increasingly in recent years for both project monitoring and evaluation purposes⁵. It is a highly informative and useful method. It is a method that explores the more extreme cases rather than attempting to identify a representative sample. A copy of the most significant stories of change form used for data collection during this

⁵ See Davies and Dart, 2005: “The ‘Most Significant Change’ (MSC) Technique - A Guide to Its Use”, available from <http://www.mande.co.uk/docs/MSCGuide.pdf>



evaluation can be seen in Annex G, while the results of the process is documented in the results section of this report.

- **Semi-structured interviews** with EACFFPC graduates, revenue authorities, national freight forwarding associations, FEAFFA, and TMEA. A semi-structured interview is a qualitative method of inquiry that combines a pre-determined set of open questions (questions that prompt discussion) centred around a mixed framework of themes relevant to the main evaluation questions. The interview also has the opportunity to explore questions beyond or around the pre-prepared, or for questions to be adapted depending on the context. This method allows flexibility for the interviewer and the respondent to explore important themes, experiences and views, while at the same time providing reliable comparable qualitative data.

A copy of the semi-structured interview questions for interviews with the various stakeholders and beneficiaries can be seen in Annex E, while the results of the interviews is documented in the results section of this report.

- **Rapid reviews of previous quantitative studies:** We have undertaken two reviews of previous studies conducted by others. The first review is of a set of studies on cargo clearance and/or release times in East Africa. Our review here focuses on investigating whether any clear trends can be seen in terms of clearance or release times over the period of the EACFFPC project. The second rapid review is of a previous study which investigated possible links between the number of customs declaration errors made by clearing agents and/or the time taken for particular clearing agents to have their cargoes cleared at the border and whether the clearing agents have been trained under EACFFPC or not.

With both of these rapid reviews we are looking to establish whether these studies provide the evaluation with useful and robust secondary data points or not. We had hoped to try to undertake some fresh analysis of possible links between the number of customs declaration errors made by clearing agents and/or the time taken for particular clearing agents to have their good cleared at the border and whether the clearing agents have been trained under EACFFPC or not. However, this was not possible because obtaining the relevant datasets from revenue authorities in the region within the timeframe of this evaluation proved not to be possible.

- **Expert analysis of the EACFFPC training curriculum and materials:** This method involves undertaking an 'expert' or 'technical' review of the training curriculum and materials with a view to producing qualitative evidence on, among other things, the relevance and quality of the training and certification. This analysis was undertaken by a recognised international expert on trade logistics, customs clearance and freight forwarding, and design and delivery of international trade training⁶.

⁶ Analysis undertaken by Mr Jon Walden of Crown Agents Ltd.



- **Analysis of project administrative data:** This data collection method focuses on collecting and analysing the project administrative data or, in other words, the project’s monitoring data. This is data that has been obtained throughout project implementation and should provide information, in this case, on indicators such as the number of people trained over time disaggregated by men and women, the rates of enrolment and trainee drop out over time, VFM metrics used, etc.

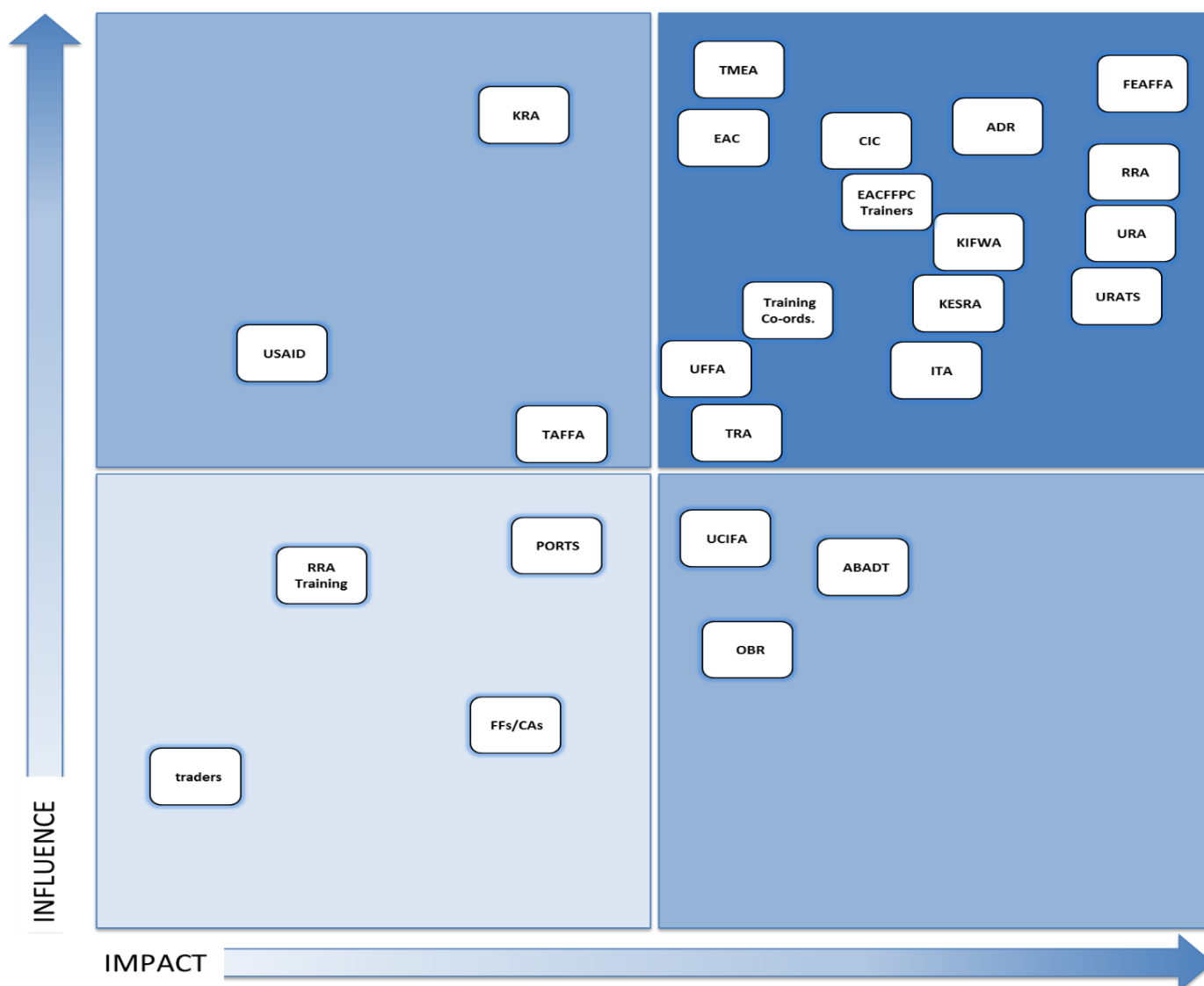
Sampling methods in data collection

- 4.4 Collecting data from a project which spans five countries, includes thousands of trainees / graduates, and has a wide range of stakeholders inevitably requires some data sampling. This sampling began at the country level. Collecting stories of most significant change and conducting semi-structured interviews required in-person visits to meet with beneficiaries and stakeholders. With the elapsed time and budgetary constraints of this evaluation it was not possible to visit all five countries, and so a country selection process was required, which is summarised below.
- 4.5 To support this country selection, and to assist the evaluation team to better understand the various stakeholders and their roles, a stakeholder mapping exercise was carried out during the inception phase of this evaluation.

Stakeholder analysis

- 4.6 A relatively rapid stakeholder analysis was conducted during inception consultations with TMEA and FEAFFA – see stakeholder analysis in Figure 3 below. This stakeholder analysis attempts to, firstly, identify the various stakeholders and, secondly, to capture their respective levels of influence and impact on the EACFFPC project. “Influence” in this exercise is defined as “the ongoing capacity of the stakeholder to effect the scope, shape or direction of the project”, while “impact” is defined as “the extent to which a stakeholder actually effected the scope, shape or direction of the project”.

Figure 3: EACFFPC stakeholder analysis



ABADT	Association Burundaise des Agences en Douane et Transitaires	RRA	Rwanda Revenue Authority
ADR	Association des Agences en Douane du Rwanda	RRA Training	Rwanda Revenue Training School
OBR	Office Burundais des Recettes	TAFFA	Tanzania Freight Forwarders Association
CIC	Curriculum Implementation Committee	TMEA	TradeMark East Africa
EAC	East African Community Secretariat	TRA	Tanzanian Revenue Authority
FEAFFA	Federation of East African Freight Forwarders Associations	EACFFPC Trainers	EACFFPC Trainers who qualified from training of trainers
FFs/CAs	Freight Forwarders/ Clearing agents	Training Co-ords.	National and regional training coordinators
traders	Importers/ Exporters	UCIFA	Uganda Clearing Industry and Forwarding Association
ITA	Institute of Tax Administration Tanzania	UFFA	Uganda Freight Forwarders Association



KESRA	Kenya Revenue Authority's School of Revenue Administration	URA	Uganda Revenue Authority
KIFWA	Kenya International Freight & Warehousing Association	URATS	Uganda Revenue Authority Training School
KRA	Kenya Revenue Authority	USAID	United States Agency for International Development
PORTS	Port Authorities		

4.7 Having conducted the stakeholder analysis, one important reflection to note is that the EACFFPC project has had a relatively diffuse and complex training implementation network. These actors include:

- **TMEA**: Funding agent for the EACFFPC, also played an overarching facilitative and monitoring role across the project.
- **FEAFFA**: Key recipient of TMEA funds and lead coordinating body for EACFFPC project at the regional level, coordinating such things as the development of the curriculum, the region-wide marketing of the EACFFPC, policy advocacy work relating to EACFFPC⁷, project wide monitoring, etc. A regional training coordinator was brought into the FEAFFA team to lead this work.
- **National freight forwarder associations**: Key coordinating bodies at the national level responsible for coordinating such things as national level marketing, participation of national actors in curriculum development and policy advocacy processes, national level monitoring activities, etc. A national training coordinator was recruited into the national associations to lead this work. Some national associations also deliver training.
- **Customs departments of national revenue authorities**: The customs departments of national revenue authorities played an important role in the development of the EACFFPC training curriculum.
- **East African Community (EAC) Secretariat**: THE EAC was involved in both the curriculum development and the policy advocacy work relating to the EACFFPC.
- **Training institutes of national revenue authorities**: The training arms of national revenue authorities delivered most EACFFPC training and set and assessed the majority of candidate examinations. They also played an important role in curriculum development and in collecting project monitoring data.

Data collection sampling by country

4.8 It is important to recognise that, in order to deliver a valuable and informative evaluation, the evaluation team needed to be selective in its engagement with stakeholders. The large and diffuse network of stakeholders across five countries, together with the need to effectively

⁷ Namely, a regional policy change leading to EACFFPC training and certification (or equivalence to the EACFFPC) becoming an obligatory requirement for revenue authorities' licencing of freight forwarding companies.

prioritise and deploy the limited resources (both time and financial) available for this evaluation, implied a need to sample the data collection respondents / participants.

4.9 From the stakeholder analysis above, we were able begin to think about the number of key stakeholders per country and the relative influence / impact on the project from stakeholders within each country. This is summarised in Table 2 below.

Table 2: Number and average level of impact/ influence of EACFFPC stakeholders per country

Burundi		Kenya		Rwanda		Tanzania		Uganda	
Stakeholder	Impact / Influence (H=3, M=2, L=1)	Stakeholder	Impact / Influence (H=3, M=2, L=1)	Stakeholder	Impact / Influence (H=3, M=2, L=1)	Stakeholder	Impact / Influence (H=3, M=2, L=1)	Stakeholder	Impact / Influence (H=3, M=2, L=1)
ABADT	2	FEAFFA	3	ADR	3	ITA	3	UCIFA	2
OBR	2	KESRA	3	RRA	3	TAFFA	2	UFFA	3
		KIFWA	3	RRA Training	1	TRA	3	URA	3
		Kenya Port Authority	1			Tanzania Port Authority	1	URATS	3
		TMEA	3			EAC Secretariat	3		
Total no. of stakeholders	Average impact / influence	Total no. of stakeholders	Average impact / influence	Total no. of stakeholders	Average impact / influence	Total no. of stakeholders	Average impact / influence	Total no. of stakeholders	Average impact / influence
2	2	5	2.6	3	2.3	5	2.4	4	2.8

Note: In this table “H” is high, “M” is medium, and “L” is low

4.10 To inform the country selection (i.e. which countries would be visited in person for stories of change collection and semi-structured interviews) we defined a set of criteria and ranked the countries in accordance with how they score on each individual criterion. The ranking on individual criterion is summed, with equal weighting to each criterion, to determine the ranking of countries overall. This exercise is shown in Table 3 below:

Table 3: Prioritisation of target countries for data collection

Countries	Criteria for Country Selection			
	No. of EACFFPC graduates	Percentage of graduate who are women	No. of stakeholders engaged in EACFFPC in each country	Stakeholders' average influence / impact per country
Burundi	164	29.13%	2	2
Kenya	1665	22.10%	5	2.6
Rwanda	299	40.13%	3	2.3
Tanzania	1218	29.39%	5	2.4
Uganda	717	28.87%	4	2.8
Countries	Country ranking score per country selection criterion (5 = highest, 1 = lowest)			
Burundi	1	3	1	1
Kenya	5	1	4.5	4
Rwanda	2	5	2	2
Tanzania	4	4	4.5	3



Uganda	3	2	3	5
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Countries	Total score across all country selection criteria	Overall Ranking (highest = 5, lowest = 1)
Burundi	6	1
Kenya	14.5	4
Rwanda	11	2
Tanzania	15.5	5
Uganda	13	3

4.11 This ranking of countries helped to guide the team in which countries to visit in person for the purpose of undertaking the semi-structured interviews and stories of change collection. The highest ranked countries, Tanzania and Kenya, were chosen accordingly. This outcome was also deemed appropriate on the basis that these countries contain the two main ports for the region (in Mombasa and Dar es Salaam) and are consequently likely to have the greatest number of clearing and forwarding firms.

4.12 It is important to note that the evaluation team engaged with data from all five relevant countries during this evaluation (e.g. through the perception survey of graduates across the region). This prioritisation of Kenya and Tanzania related to determining the sample for the semi-structured interviews and the stories of change collection only.

4.13 Having selected Tanzania and Kenya, TMEA advised the evaluation team that the landlocked countries in the EAC should also be represented in the interviews and stories of change data collection. In consideration of the very tight period of elapsed time available for these in-country visits, Rwanda was added to Tanzania and Kenya as the three countries in which we would undertake the in-person meetings for semi-structured interviews and stories of change collection. This was on the basis that LDP has associates based permanently in Kigali, making meetings in a third country achievable from a practical perspective (i.e. within the brief elapsed time and budget available).

Further sampling of target participants/ respondents

4.14 Sampling is an important feature in evaluative work and this EACFFPC summative evaluation is no exception. Given the short period of elapsed time available for this evaluation and the limited financial resources available, sampling of participants/ respondents in data collection (beyond the above mentioned country selection considerations) was very important.

4.15 On the basis of our inception activities it was envisaged that the sampling was likely to be a blend of various types, recognising that the type of sampling used will depend, to a large extent, on resource (time and financial) constraints and data availability.

4.16 It was envisaged that these sampling types might include **purposeful** sampling (on the basis of particular characteristics that are of interest and which will best enable evaluators to answer research questions), **theoretical** sampling (on the basis of emerging theories from previously



collected data), and **convenience** sampling (on the basis of ease of accessibility). The **types of purposeful sampling** we hoped to deploy included **deviant** sampling (identifying extreme or outlier cases within the context of, and in conjunction with, other sampling strategies), **critical case** sampling (focussed enquiry into a small number of important experiences - experiences that are likely to yield the most information and have the greatest impact on the development of knowledge), and **key informant** sampling (focussed enquiry into a small number of participants / respondent who have especially relevant expertise).

4.17 Table 4 below summarises the actual data sampling used for those data collection methods in which sampling was required. The heavy reliance on convenience sampling is reflective of the data limitations and constraints faced in this evaluation (see more on this below).

Table 4: Sampling type per relevant data collection method

Relevant data collection method	Explanation of population definition and sampling approach used
Perception survey	<p>Convenience sampling was used because contact information was only available for a sub-set of the population. Surveys were issued to all graduates for whom we had contact information (i.e. email addresses).</p> <p>The population was defined here as “all EACFFPC graduates”. It would have been interesting to define the population more broadly, for example as “EACFFPC trainees” (i.e. all those who enrolled), which would include drop-outs and those who failed exams, as well as graduates. This was not possible as no contact information was available for any trainees other than (some) graduates.</p>
Stories of change	<p>Although a sampling frame is not needed for the stories of change method, in this instance there was convenience-based sampling because the same graduates in the sample for semi-structured interviews were asked for their stories of change.</p>
Semi-structured interviews	<p>Sampling of EACFFPC graduates was, in this instance, convenience-based. This was because no contact details were available for graduates in Kenya and Tanzania and only some details were available for graduates in Rwanda. For graduates in Kenya and Tanzania we had only a list of names. From this list of graduates in each country we selected 10 male and 10 female graduates. TMEA and FEAFFA then worked to set up meetings between the evaluation team and this sample of graduates during which the semi-structured interviews could take place.</p> <p>The population here was defined as “all EACFFPC graduates”. However, it would have been preferable to define the population more</p>



	<p>broadly, as “EACFFPC target beneficiaries”. This would have included EACFFPC trainees (i.e. all those who enrolled, which would include drop-outs and those who failed exams, as well as graduates) and the importers and exporters who would benefit from the increased standard of freight forwarding and clearing services. This was not possible as no contact information was available for any non-graduate EACFFPC trainees or for the importers / exporters serviced by the graduates. It also proved challenging to obtain agreement from EACFFPC graduates for the evaluation team to access the contact details of their clients.</p>
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Data collection challenges and constraints faced

4.18 A key concern noted during our inception consultations was the potentially serious and significant limitations in terms of the range and depth of readily available data for this evaluation. This concern was, to a large extent, justified during the data collection and analysis stages of the evaluation. These data limitations had a serious constraining effect on this evaluation both in terms of the level and range of evaluative inquiry that was possible and also in terms of the robustness and reliability of some findings, given the inherent bias involved with such a reliance on convenience sampling.

4.19 Important data that was not readily available at the beginning of this evaluation, or attainable by the end, and would reasonably have been expected to be so, includes⁸ the following:

- Consistent and clear data on the number of people enrolled on, dropped out of, failed or graduated from the EACFFPC training course in all five participating countries, disaggregated by men and women, and by year.
- Clear and consistent data on the number of trainers trained under the project.
- The names and contact details of all EACFFPC trainees (including graduates, drop outs and those who failed the course)
- Completed training feedback forms from all EACFFPC trainees;
- The number of freight forwarding firms in East Africa, ideally disaggregated by men and women (e.g. number of male/female employees per firm, or number of male/female owned firms)
- The number of firms in the region with EACFFPC trainees / graduates as employees
- Secondary data sets on number of declaration errors made by clearing agents over time from one or more of the national revenue authorities

⁸ More discussion on these data limitations in the results section of the report.



4.20 Relevant TMEA and FEAFFA personnel provided significant support and effort to try to locate and share missing data and try to mitigate the limiting effect of the data's absence on this evaluation, for which our evaluation team are grateful. However, the majority of these data gaps are a result of ineffective ex ante data management and data management planning (i.e. during project design, project implementation and evaluation planning stages⁹) and could not reasonably have been expected to be remedied or dramatically improved ex post (i.e. after commissioning the evaluation), despite the best efforts of all involved.

⁹ More on this in the results section of this evaluation report



Results

This section summarises the evidence which emerged from data collected in response to each of the main evaluation questions posed in the evaluation plan. These results are organised and presented by OECD DAC criterion.

Impact

5.1 The main evaluation question relating to impact is as follows:

(1) What was the intervention's measurable impact on a more effective logistics sector? To what extent can identified changes be attributed to the intervention? What would have occurred without the intervention?

5.2 In order to investigate the impact of the EACFFPC project it was envisaged that the evaluation would analyse indicators on cost, time and quality of freight forwarding and clearing services, as well as evidence of positive and/or negative changes recorded by beneficiaries as a result of the EACFFPC project.

Evidence of reduced clearance or release times and/or costs at border points

5.3 To investigate indicators on cost and time associated with the role of forwarders and clearing agents in the cross-border trade process, it was envisaged that an econometric analysis of time release data and/or the replication of a previous difference-in-difference study of freight forwarders mistakes with new data (investigating the link between errors made and whether the freight forwarders were EACFFPC trainees or not) would be conducted. However, neither of these studies was possible due to the lack of available data forthcoming from national revenue authorities, despite a number of formal and informal requests for data.

5.4 In lieu of this, we undertook two rapid reviews of previous studies. The first review was of a set of studies on cargo clearance and/or releases times in East Africa¹⁰. Our review here focuses on investigating whether any clear trends can be seen in terms of clearance or release times over the period of the EACFFPC project. The second rapid review is of a previous study¹¹ which investigated possible links between the number of customs declaration errors made by clearing agents and/or the time taken for particular clearing agents to have their goods cleared at the border and whether the clearing agents have been trained under EACFFPC or not. A summary of these rapid reviews is provided in the following paragraphs.

5.5 Several studies have analysed the average time taken between the arrival of goods at customs and their release to draw out inefficiencies to be addressed to streamline and simplify clearance

¹⁰ EAC Secretariat (2012). Pilot Regional Time Release Study: Northern Corridor. EAC Secretariat: Arusha, Tanzania. Rwanda Revenue Authority (2010). Time Release Study Report. RRA Customs Services Department: Kigali, Rwanda. SAANA Consulting (2015). Formative Evaluation of the Electronic Single Window for the Rwanda Revenue Authority Project. TMEA: Kigali, Rwanda.

Shippers Council of East Africa (2014). East Africa Logistics Performance Survey. SCEA: Nairobi, Kenya.

Uganda Revenue Authority (2008). Time Release Study Report. URA: Kampala, Uganda.

¹¹ Adam Kessler (2012). Impact of EACFFPC Training Course on Freight Forwarder Performance in Rwanda.



procedures in order to lower the cost of doing business in East Africa. Here we will highlight some of the key findings of past studies to illustrate the trends in release times in the region.

- 5.6 The Ugandan Revenue Authority carried out a time release study (TRS) in 2008 and found that the average time taken to clear goods out of Uganda was almost three days. Consignments were cleared more quickly through land border stations (under 2 days) than inland and airport stations (almost 6 days). Increasing operating hours of customs clearance offices was highlighted as a key recommendation to reduce backlogs and therefore time taken to clear goods, in particular at the international airport where goods arrive throughout the day and night.
- 5.7 In 2010, the Rwandan Revenue Authority found that the time taken from goods arriving at the border to being released from customs control had been reduced to approximately 2.5 days (58 hours) for consignments arriving at land borders (from over 170 hours in 2007). Most significantly time taken between arrival and lodgement had been reduced by 70 hours and the time between lodgement and release by over 37 hours. Average release times at the airport were still almost 7.5 days, down from over 9 days in 2007. Several recommendations were made, including increasing the capacity of clearing agents and improving their communication with importers, transporters, and customs officials to reduce the time taken between erroneous declarations being rejected and re-lodged (17 hours) and establishment of arrival notice and lodgement (24 hours).
- 5.8 A regional time release study was piloted in 2012, analysing the clearance procedures along the northern corridor. The study found that the average clearance and transit time from the arrival of goods at Mombasa Port to release in Kampala took just over 18 days, including almost 14 days at Mombasa Port, an average transit time of almost 4 days from Mombasa to Malaba, 5 hours at Malaba (Kenya), almost a day at Malaba (Uganda), almost another day in transit to Kampala, and almost three days for clearance and release in Kampala.
- 5.9 The key findings of these three TRS are summarised in Table 6 below. Since each study analyses release times at different ports in the region it is not possible to directly compare the findings. However, comparisons can be made between the two studies focusing on release times in Rwanda, as well as the findings of the Ugandan Revenue Authority in release times for inland stations and the northern corridor study which assesses clearance in Kampala four years later; both suggests release times have been decreasing.

Table 5: Summary of previous TRS findings

Time Release Study:	Average time to release goods ¹²		
	<i>Land border stations</i>	<i>Inland stations</i>	<i>Air cargo</i>
Rwanda (2007)	170 hours	197 hours	218 hours
Uganda (2008)	47 hours	164 hours	121 hours
Rwanda (2010)	58 hours	59 hours	178 hours
	<i>Mombasa Port:</i>	<i>Malaba (Kenya/Uganda):</i>	<i>Kampala:</i>
Northern Corridor (2012)	328 hours	5 hours / 18 hours	71 hours

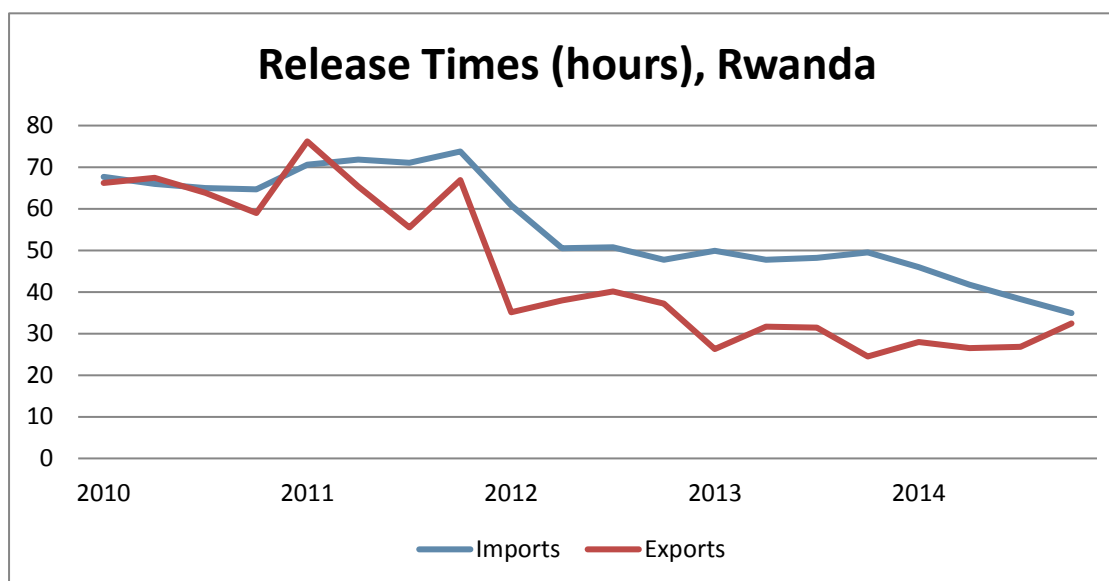
¹² Average times to release goods have been rounded to the nearest full hour.

NB: Standard deviations on all of the average release times are relatively large, highlighting the volatility in the data.



5.10 The trend in release times can be seen more clearly in the data collected as part of an TMEA-funded evaluation of the Rwanda Electronic Single Window project (Saana Consulting, 2015). Average customs processing, clearance, and release times were analysed for selected imports to, and exports from, Rwanda over time. While quarterly data of release times may be influenced by volatility in volumes being processed throughout the year, the general trend of substantially decreasing release times over the five year period is clear (see Figure 4, below).

Figure 4: Average release times (hours) in Rwanda over time



5.11 In a series of annual reports, the World Bank (WB) measures the cost of Doing Business (DB), including a measure of the ease of trading across borders, in 189 countries. Two of the sub-indicators of trading across borders are the ‘time required to export and import’, which measure the time required in obtaining, filling out and submitting all required documents, inland transport and handling, customs clearance and inspections, and port and terminal handling. Unfortunately, the publically available database does not allow for disaggregation of these sub-indicators into their components.

5.12 In 2015, it took between 18 (Tanzania) and 31 (Burundi) days to import goods to EAC Partner States. Importing took the least time in Kenya and Tanzania (26 days) and the most in Burundi (43 days), as illustrated in Table 7 below. While the time to import and export to and from landlocked countries in particular will be influenced substantially by the inland transport component, a brief look at the trend over time for all EAC countries suggests overall improvements in trading across borders (see Figure 5 and Figure 6 below).

Table 6: World Bank Doing Business Report 2015 - Trading Across Borders

WB Doing Business Sub-indicator	Burundi	Kenya	Rwanda	Tanzania	Uganda
Trading across borders (WB DB rank)	169	153	164	137	161
Documents to export / import (Nr)	9 / 9	8 / 9	7 / 9	7 / 11	7 / 10
Time to export / import (days)	32 / 43	26 / 26	26 / 27	18 / 26	28 / 31



Cost to export / import (US\$ per container)	2,905 / 4,420	2,255 / 2,350	3,245 / 4,990	1,090 / 1,615	2,800 / 3,375
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Figure 5: Time to export over time (World Bank Doing Business indicators)

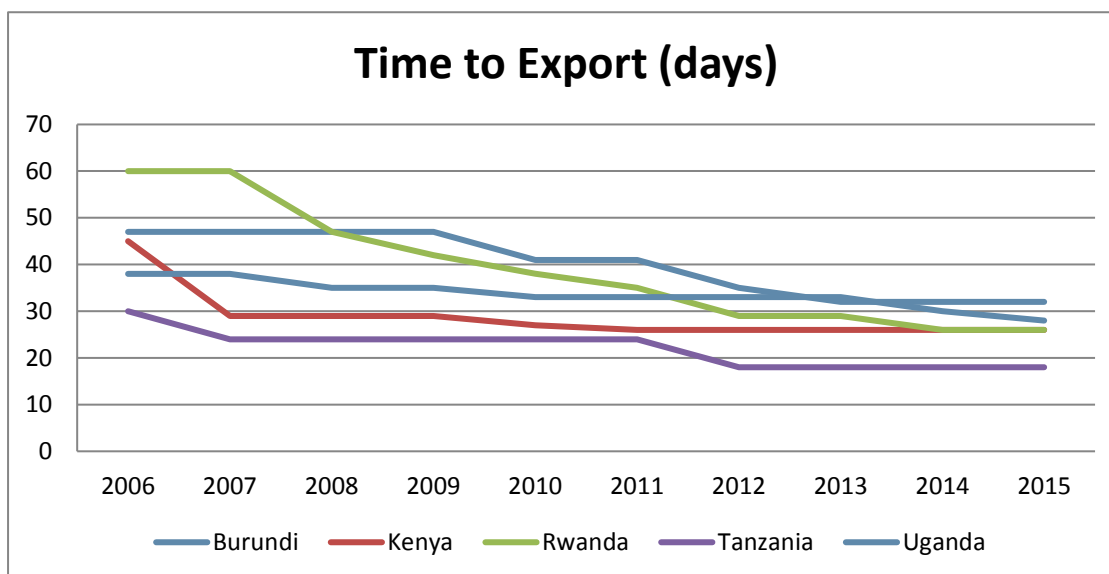
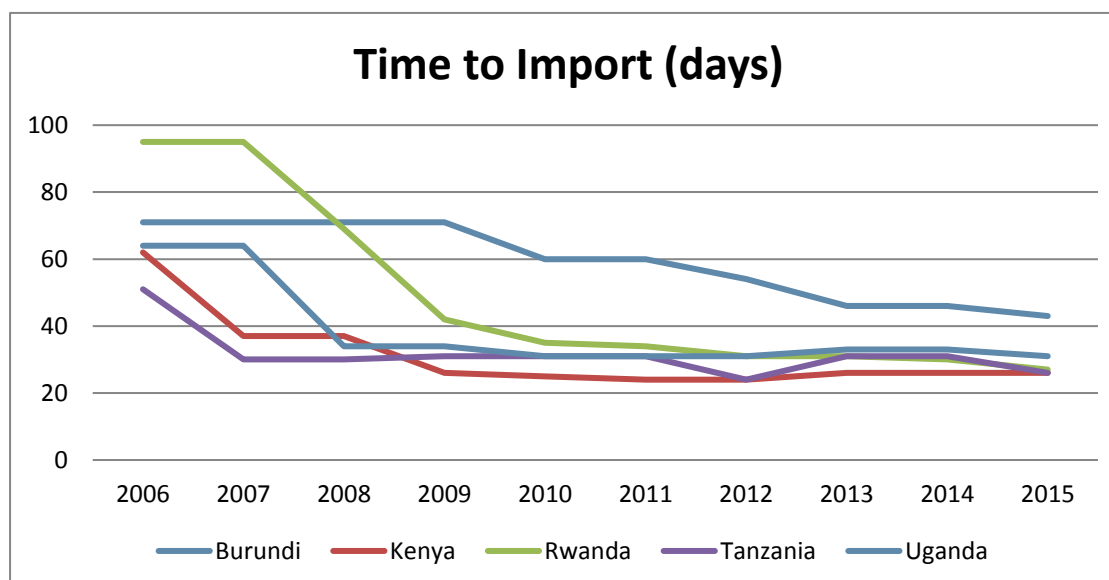


Figure 6: Time to import over time (World Bank Doing Business indicators)



5.13 In 2012, a study (Kessler, 2012) of the relationship between the EACFFPC training course and errors made by clearing and freight forwarding agents in Rwanda found that, on average, EACFFPC certified clearing agents make eight fewer errors per year than their untrained counterparts. Since freight forwarding companies are fined for errors made, the study estimated a \$385 a year cost saving for companies who employ trained clearing agents.



- 5.14 The estimated reduction in errors was based on correlation analysis of errors made by clearing agents and the proportion of clearing agency employees certified, spanning a three year period (2009-2011). The cost saving, however, was based on a single year (2011) comparison between errors made by employees of clearing agencies with no certified staff and those with at least one certified member of staff. The conclusion is drawn that the training course is cost effective. However, cost effectiveness of the investment in the training course may depend on how many employees need to be trained for a company to maximise efficiency gains as well as the prevailing staff retention rates.
- 5.15 The report shows that errors per staff member have actually been increasing over time. Unfortunately, data on employees per clearing agency was only available for one year and therefore assumed constant. Since the logistics sector in Rwanda has been growing, this may not be the case. If employee numbers increased in the period of study, errors per member of staff might not have increased at all. The increase in errors could also be explained by other factors such as adjustment to cross-border procedural changes.
- 5.16 The study analyses simple correlations as robustly as possible using the data available at the time. While the study finds a correlation between companies employing certified clearing agents and errors being made, the relatively low R value suggests that even though changes in the predictor are related to changes to the response variable the model does not explain a lot of the variability. This seems intuitive since other contributing factors, such as the volume of traffic handled by clearing agents, were not included in the analysis. The correlation is on the margin of being statistically significant ($p=0.05$). Additionally, there is no statistically significant difference between the two groups (companies with no trained employees/ companies with at least one trained employee) used to estimate the difference in errors made by clearing agents in 2011 as the basis of the cost saving. The study also aimed to investigate the impact of the EACFFPC training course on customs release times, but was unable to determine a statistically significant correlation and rightfully excluded this analysis from the report.
- 5.17 Correlation does not, of course, imply causation and further analysis would be beneficial, especially now that EACFFPC training and certification has become obligatory and significantly more clearing agents have been trained, proving a more substantial dataset. In particular, time series data on the number of employees per clearing agency and analysis of the volume of traffic handled by freight forwarders would be a valuable addition.

Evidence of positive and/or negative changes recorded by beneficiaries (graduates)

- 5.18 To investigate the evidence of positive and/or negative changes recorded by beneficiaries as a result of the EACFFPC project, this evaluation utilised the *most significant stories of change* qualitative evaluation method as a means to explore and collect evidence of the impact of this EACFFPC project in terms of any positive or negative changes experienced as a result of the project.
- 5.19 Stories of change were collected from nineteen graduates of the EACFFPC training. This involved collecting stories of significant change from each of these EACFFPC graduates. The stories from graduates focussed on changes that have taken place for them as individuals, or for their firm,



directly as a result of the EACFFPC training and certification. The systematic selection of *most* significant stories of change began with the graduate's own selection of *most* significant change from the number of different changes the graduate cited as being significant.

5.20 The systematic selection process then continued in a session on 31 March 2015 facilitated by LDP in which the TMEA programme and results teams and FEAFFA representatives reviewed and selected the three stories of '*most* significant change' out of the nineteen stories collected from EACFFPC graduates in Rwanda, Kenya and Tanzania.

5.21 Divided into two groups, TMEA and FEAFFA representatives read each story and discussed internally what changes stood out in the story and which stories should be selected as representing the *most* significant change and why. The whole group then discussed in depth which stories they felt should be finally selected and why they were seen as significant. Selection was rigorous, but not contentious – there was unanimous agreement on the three most significant changes.

5.22 The selected stories of most significant change are shown in Figure 7 below, with the reasons for the selection shown in Table X below.

Figure 7: EACFFPC stories of most significant change

“Growing for (and with) the Business” by Susan Mukankubana

I was appointed as the managing director of Top Freight before I ever worked in the freight forwarding business or received any training in this business. I had no knowledge of clearing and forwarding, I had just completed my bachelor in marketing. We had few clients. I did not know how to advise them well and I had no confidence in my job. This also meant I was not able to manage my staff effectively or develop the business further by attracting new clients. I did not have enough to offer them. Customers often got the information they needed from other people (e.g. customs officials) because I was not able to provide everything they needed.

The owner of Top Freight suggested I should participate in the training, but I was also very interested to do so myself because I was driven to become better at my job and really excel in my position as managing director. The company offered to fund the course for me and I studied from June 2011 to January 2012. I learned a lot in this time, including technical knowledge about customs law, rules of origin, valuation procedures, and tariff classification and also customer care, business management, and ethics. I developed into a professional clearing agent and learned the skills to successfully manage, develop, and build this business.

Customers see me differently now. I had too little experience before and was not able to offer importers/exporters an effective and comprehensive service. But now I am. I can provide all the information my clients need accurately and with confidence and can advise them well. I have been able to really market our service and attract more clients for our company. The business has developed and is growing successfully. The training also made me like the business a lot more and take pride in it. I started as the managing director and have now bought shares in the business and am really committed to it.

“Building Knowledge to be the Best I can be” by Brian Issa Biryomumaisho



Before the training there were many things I could not understand. There were many technical things I did not know about, which meant I could not do my job as well as I wanted to. I made many mistakes: Importing from the UK parcels often arrived and were delivered straight to me, because I didn't know how to interpret all the notes with it very well I sometimes paid on behalf of the client and later found out that it had already been pre-paid. This caused a lot of frustration for the client and hassle for my company to sort out later. I didn't know how to calculate tariffs and taxes properly so I would sometimes advise friends or clients to import products that were actually not good value to import once all duties were paid.

The company I worked for got a new client, who was very important to the company and brought a lot of business. My boss suggested that I could manage the account, but that I should participate in the training course first. I really wanted to learn everything I could to do my job well and was very glad when this opportunity came up. I learned so much about valuation techniques, tariffs, taxes, electronic systems, customs procedures, what happens at every stage of the cargo transport from the ports to Kigali, and how to manage customers well and be professional. I was very interested and was able to apply all the knowledge I gained to my job very quickly.

I have become much better at my work, understand every step of what I do, and have all the knowledge to serve my client well. I no longer make mistakes with payments, valuation, tariffs or taxes. The advice I provide is based on solid knowledge and my boss and my clients can see that. I am confident in what I do and feel secure now. Before the training people could look down on me with an attitude of 'you don't know' but now when I talk to the head of the company, revenue authorities, or clients I get treated with a lot of respect and very professionally. My knowledge and skills are recognised.

“From Jua Kali to Professional” by Janet Wanjiru

It was jua kali – a casual approach to customers. I would try, and if I got it right then good, but if not so what. It's a job, so I can earn a living. Customers were OK with it but did not respect freight forwarders – we were seen as corrupt. “Miscellaneous charges” were always expected on the invoice.

I was attracted to EACFFPC training advertised by KIFWA in 2009 because I saw an opportunity to become more professional. I learned it is important to give clients relevant and accurate information, keep documentation well and clear, and have a good interaction with customers.

I am a professional. I now serve the customers. When a customer says “I want to import X” I can provide all relevant costs and other information to help them. I understand the system and I am organised. I take pride in my work and I get respect from customers, the KRA and my colleagues and friends.

Table 7: Reasons for selection of three most significant stories of change

Story Chosen	Why most significant?
<p>“Growing for (and with) the Business” by Susan Mukankubana</p>	<p>Before the change:</p> <ul style="list-style-type: none"> • Susan describes a lack of confidence and limited skills; • She had few clients, was unable to attract new customers and did not have the skills to manage staff and clients effectively. This meant that the business could not grow; • She lacked operational knowledge on customs procedures, further deterring her from doing her job well.



	<p>After the change:</p> <ul style="list-style-type: none"> • She is now very confident, skilled and knowledgeable. • She takes pride in her ability to do her job well and is fully in charge of the company. She has even become a shareholder. • She is now able to attract more clients and grow the business.
<p>“Building knowledge to be the best I can be”</p> <p><i>by Brian Issa Biryomumaisho</i></p>	<p>Before the change:</p> <ul style="list-style-type: none"> • Lack of knowledge on taxes, tariffs and clearing which led to regular errors. • His incompetence in his role led to a loss of clients and made the company incur additional costs • The story describes frustration of clients and company as a result of disputes on taxes and tariffs. <p>After the change:</p> <ul style="list-style-type: none"> • Brian describes increased competence and confidence as well as professional recognition as a result of fewer errors and the ability to provide professional advice to clients; • He is more confident in his role and has professional pride; • He has also experience respect from revenue authorities as a result of his professional development.
<p>“From jua kali to professional”</p> <p><i>by Janet Wanjiru</i></p>	<p>The story is told well and is very honest. It highlights the importance of hard and soft skills for ensuring growth and success.</p> <p>Before the change:</p> <ul style="list-style-type: none"> • Janet was ignorant about customer relations, ‘just used to try’; • Was motivated by basic needs as opposed to professional endeavours; • The story also explains the stigma experienced by unskilled clearing agents. <p>After the change:</p> <ul style="list-style-type: none"> • Janet now has knowledge and operational - and client relations skills; • She seems to feel transformed after having acquired the new skills; • In her story she demonstrates the impact of the training on ethics, skills and pride; • She has more confidence in dealing with KRA.

5.23 In addition to the selection of stories of most significant change, it is also informative to reflect on the themes emerging from all of the stories of change collected from EACFFPC graduates. These themes include:

- Freight forwarders/ clearing agents had previously received little or no operational training to enable them to do their job effectively. Important information, valuation and tariff classification, among many others, were not sufficiently familiar to the freight



forwarders/ clearing agents, preventing them from doing their jobs effectively and making them vulnerable to illegitimate or erroneous charges and penalties, often passed on to their clients (i.e. importers/ exporters).

- Due to a prevailing lack of knowledge prior to undertaking the EACFFPC training, many of the freight forwarders/ clearing agents did not take pride in their work and felt the role of freight forwarder was not respected or trusted by clients or revenue authorities.
- Overall, the graduates highly valued the skills gained from the EACFFPC course. With increased professionalism in freight forwarding, relationships are being repaired and built between freight forwarders and clients, customs and other border agencies.
- Many participants experienced professional recognition from employers now that they are more productive and make fewer errors and have been promoted or gained a higher salary. Participants describe new-found job satisfaction, professional pride and confidence as well as improved professional relations.
- A number of graduates mention that the businesses in which they work have also become more competitive with a growing client base as a result of increasingly professional operations.
- A key theme from the stories of change is the impact the training has had on the improved service provision to clients i.e. importers/ exporters. This improved service was articulated as increased efficiency as a result of improved operational knowledge leading to reduced time taken to clear goods and/or reduced number of penalty charges (e.g. storage charges or penalties for incorrect valuation of goods, etc.) leading to a lower cost of trading for importers/ exporters.
- On a related theme, many graduates, when discussing changes that have taken place since the EACFFPC training, cited a reduction or elimination of the errors they commit in customs declaration procedures. This has led to increased efficiency (less time per clearance transaction) in operations and lower associated costs (fewer penalty charges from customs).

5.24 These findings from the most significant stories of change process can also be triangulated with similar evidence gathered from a survey of EACFFPC graduates that was conducted (see more on this survey in the next section on 'effectiveness'). The survey found that 92.4% of survey respondents felt the EACFFPC training helped them to offer a quicker service to their clients (i.e. importers / exporters), while 81.5% believe the EACFFPC training has helped them to offer a lower costs service to their clients.

Summary of findings relating to impact of the EACFFPC project

5.25 From the review of previous studies on clearance and release times at border points in the region and looking at the World Bank indicators on Doing Business in the region, ***there does appear to be a downward trend in the time taken for goods to be cleared / released at border points in the region over recent years. There is no evidence within these studies that this downward***



change is a result of increased standard of services in the freight forwarding and clearing industry however.

- 5.26 A review of a previous study (Kessler, 2012) into the links between EACFFPC training and the number of errors committed by freight forwarders / clearing agents finds that ***firms employing EACFFPC graduates do appear to make fewer errors in their customs declarations. Although it is not possible to comment on what extent the training is the cause of the reduced number of errors by trained staff.***
- 5.27 The qualitative evidence collected in the stories of change indicates that EACFFPC training has helped freight forwarders and clearing agents to become more efficient and effective in their work, particularly in the accuracy and timeliness of their customs declarations, leading to fewer penalties as a result of declaration errors (lower cost to importers/ exporters) and fewer illegitimate fees charged by customs (reduced corruption). The stories of change collected describe significant positive changes taking place for EACFFPC graduates, the companies they work for, and the importers/ exporters they service as a result of the training. These changes include: improvements in the performance of the graduates with increased accuracy and efficiency in their work; improved levels of self-confidence and perceived improvements in the confidence of counterparts (employers, border agencies, clients); a belief of heightened professionalism; and time and cost savings as well as improved predictability and confidence for clients (i.e. importers/ exporters). ***The stories of change do indicate that individuals trained have experience a strong positive impact from the EACFFPC in helping to improve the quality, timeliness and cost of their services. These individuals attribute this impact to the EACFFPC. It is impossible to say with certainty that these changes would not have occurred without the EACFFPC project, but it seems unlikely given that no direct equivalent to this EACFFPC training and certification exists in the region.***
- 5.28 The evidence from these stores of change regarding the increased efficiency and effectiveness of freight forwarders / clearing agents services to importers/exporters is echoed in the results of our survey of EACFFPC graduates, which found ***the large majority of survey respondents feel the training has helped them to offer a quicker and lower cost service to their clients (importers / exporters).***
- 5.29 None of these data points individually represent clear and convincing evidence of the EACFFPC's measurable impact on a more effective logistics sector in the region, or extent to which such impact can be attributed to the EACFFPC. However, ***from triangulating the data points it is possible to say that the EACFFPC appears to be having a positive impact on the standards of key actors in the logistics sector (i.e. forwarders and clearing agents) and this positive impact is happening in the context of falling clearance and release times in the region.***

Effectiveness

6.1 The main questions posed relating to effectiveness of the EACFFPC project are as follows:

(2) To what extent was the objective of a higher standard of services across the freight forwarding industry in East Africa met?



(3) How far were the intended outcomes and outputs achieved?

(4) If gender mainstreaming targets were set at project inception, to what extent were targets achieved, and what were the successes and challenges?

6.2 The indicators investigated to answer these questions include the following:

- Evidence of improved service provided by freight forwarders
- Evidence of the relevance of training to daily work
- The number of men and women passing the course
- The rate of enrolment over time
- Drop-out rates of male and female trainees
- Number of men and women trained (less drop-outs)
- The training participants' perception of increase in professional knowledge
- Evidence of training meeting international standard
- No of licences revoked for lack of EACFFPC or equivalent
- No of revenue authorities adopting and implementing new policy of obligatory certification for operational licence of freight forwarders and clearing agents.
- The percentage of women trained relative to percentage of women in freight forwarding profession in East Africa
- Evidence of (un)equal access to training opportunity

Evidence on the extent to which the objective of a higher standard of services across the freight forwarding industry in East Africa was met

6.3 Gathering evidence on the extent to which a higher standard of services across the freight forwarding industry in East Africa focussed on semi-structured interviews with EACFFPC graduates and national revenue authorities in the region. This evidence can also be triangulated with the evidence emerging from the collection of stories of most significant change and the evidence of the survey of EACFFPC graduates (see more detail on this survey later in this section of the report). It was also hoped that evidence could be gathered on the number of customs declaration errors made by forwarding/ clearing agents, trained and untrained, over time. However, despite multiple requests, it was not possible to obtain this data from revenue authorities.

6.4 The semi-structured interviews with EACFFPC graduates explored, among other things, how the graduates felt they benefitted from the training and certification, how they felt their clients (i.e. importers and exporters) benefitted, and how they felt the border agencies that they engage with have benefitted.

6.5 In terms of how EACFFPC graduates feel they have benefitted from the training and certification, the views were unanimously positive, with the following themes emerging from an analysis of the interview notes¹³ (listed here in order of the frequency in which the respective benefits were cited by graduates):

¹³ This analysis methodically searched for 'coded themes' common in the interview notes.



- Increased operational knowledge on how to perform the job of a forwarding / clearing agent to a higher standard
- Improved levels of self-confidence and/or self-pride in the graduates' professional lives
- Improved levels of professionalism
- Career development and/or promotion opportunities

6.6 In terms of how EACFFPC graduates feel their clients (i.e. importers and exporters) have benefitted from their training and certification, the following themes emerged from the interviews (listed here in order of the frequency in which the respective benefits were cited by graduates):

- importers and exporters have enjoyed a faster, more efficient service helping to realise faster clearance and release of their cargoes
- reduced costs associated with import/ export of their goods, primarily through the significant reduction of unnecessary or illegitimate charges or penalties as a result of the improved service received from clearing and forwarding agents
- improved service generally, including better communication from forwarders and clearing agents, giving importers/ exporters greater confidence in the service

6.7 In terms of how EACFFPC graduates feel the border agencies with whom they engage (e.g. customs) have benefitted from their training and certification, the following themes emerged from the interviews (listed here in order of the frequency in which the respective benefits were cited by graduates):

- Border agencies will have saved time in processing import/ export documentation because of the reduced number of errors in document submissions and the increased ability of the forwarding/ clearing agent to address and queries or errors promptly and accurately.
- Improved communication and professional relationship between border agencies and freight forwarders/ clearing agents
- Reduced corruption because the reduction in errors made by or freight forwarders/ clearing agents, together with their increased knowledge of correct procedures, limits the scope and opportunity for illegitimate or corrupt charges from, or facilitation payments to, customs in the border clearance procedure.
- Improved revenue collection for revenue authorities due to the increased compliance of trained freight forwarders and clearing agents, with compliance increasing due to the application of knowledge and skills learned.



6.8 Semi-structured interviews were also undertaken with customs officials at national revenue authorities in Kenya (KRA), Tanzania (TRA) and Rwanda (RRA). Customs officials engaged in the clearance of cargoes at border points in the region were asked what, if any, improvements they have seen in the standard of freight forwarders and clearing agents in region. The following themes emerged from the interviews (listed here in order of the frequency in which the themes were cited by the customs officials).

- Over the last few years there has been an improvement in relation to the number of errors made by clearing agents in their customs declarations, as a result of the improved technical knowledge of the clearing agents.
- There has been improved communication between customs officers and freight forwarding/ clearing agents in recent years.
- There is a continued need for training and professionalising the clearing and forwarding sector.

6.9 The evidence gathered from these semi-structured interviews with EACFFPC graduates and national revenue authorities (customs officials) supports a conclusion that the objective to achieve a higher standard of services across the freight forwarding industry in East Africa has been met to some extent by the EACFFPC training and certification initiative. The evidence from the most significant stories of change process and the survey of EACFFPC graduates also supports this conclusion.

6.10 While it is difficult to be conclusive as to the precise extent to which the objective has been met by the EACFFPC, those interviewed were unanimously positive about the increased standard of services as a result of the EACFFPC training. This evidence should also be viewed in the context of the biased sampling of EACFFPC graduates interviewed (see previous section on sampling earlier in this report). The evidence could be strengthened by collection of data from the importers/ exporters serviced by EACFFPC graduates (via a survey or semi-structured interviews) to understand to what extent they have experienced higher standards of service.

Evidence on how far intended outcomes and outputs were achieved?

6.11 Investigating the evidence on the extent to which intended outcomes and outputs were achieved involved analysis of the project administrative data, conducting a survey of EACFFPC graduates, and undertaking semi-structured interviews with relevant project stakeholders and participants. The progress against intended outcomes investigated included the following:

- Did the project train the target number of freight forwarders / clearing agents?
- Has the demand for training increased over time?
- Did the training increase the knowledge of graduates?
- Did the graduates apply the new/additional knowledge in their work?
- Did the course and certification improve the graduates' service to their clients?



- To what extent was the policy change around obligatory certification as part of revenue authorities issuing licences to freight forwarders / clearing agents in operation and what effect was this having?

6.12 Analysing the project administrative data should have allowed for clear assessment of progress against certain intended outcomes, such as the number of men and women trained on the course, the rate of enrolment (as an indicator of demand) over time, and the drop-out rates of male and female trainees over time (as an indicator of the quality of the training). However, this has not been the case because of the incoherence and inconsistencies present in the project monitoring data. Annex C provides a summary of the various documents and data sets, which the evaluation team received from TMEA and FEAFFA and captures well the ambiguous picture of available project administrative data.

6.13 From the available data, it is very difficult to be clear what the total number of people trained under this project actually is, let alone the number of people trained during the period of TMEA's funding for to the project. The most complete data seems to suggest a total of 4063 people graduated, plus 248 people given an equivalent 'certificate of competence', of which 3183 were men and 1128 were women. If these numbers are correct, and there is no way of reasonably verifying these numbers in the context of this evaluation, the project has come very close to meeting its target of 4,500 freight forwarders / clearing agents trained i.e. the so-called "critical mass" of trainees.

6.14 It is not possible, due to the lack of clear data, to reliably analyse the level of enrolment on the course over time or the rate of drop out from the course over time, both of which would have proved to be useful indicators of the level of demand for the training and the quality and/or relevance of the course respectively.

6.15 Moving beyond existing project administrative (monitoring) data, the evaluation team undertook a survey of EACFFPC graduates in order to gather evidence on the extent to which the project outcomes were achieved, in particular:

- Did the project increase the knowledge of graduates?
- Did the graduates apply the new/additional knowledge in their work?
- Did the course and certification improve their service to clients?

6.16 This survey was issued (via email) to 946 EACFFPC graduates, with 111 of the issuing emails not reaching the intended respondents (presumably due to incorrect or outdated email addresses). Of the 835 graduates who were successfully sent the survey, 137 responses were received in total, representing a response rate of around 16%. Ideally, this survey would have been issued to all EACFFPC graduates (assumed to be a total population of around 4000 EACFFPC graduates). A similar response rate from this population would have provided greater opportunity to obtain statistically significant results. This was not possible because the project team (TMEA and FEAFFA) could only provide email addresses for 946 graduates, of which 111 of these email addresses were either incorrect or no longer in use.



6.17 Nevertheless the survey has provided some very interesting and informative evidence on the effectiveness of the project, as shown in Table 10 below.

Table 8: Summary of graduate perception survey results on effectiveness of EACFFPC training and certification

Question 1	Yes	No	Total answered	% Yes	
Did the EACFFPC training provide you with new and/or improved knowledge and skills?	127	0	127	100%	
Question 2	Not useful	Occasionally useful	Regularly useful	Total answered	% Regularly useful
How useful has the training been in helping you to do your job better?	2	19	104	125	83.2%
Question 3	Yes	No	Total answered	% Yes	
Has the EACFFPC training helped you to offer a quicker service to your clients (i.e. importers / exporters)?	110	9	119	92.4%	
Question 4	Yes	No	Total answered	% Yes	
Has the EACFFPC training helped you to offer a lower costs service to your clients (i.e. importers / exporters)?	88	20	108	81.5%	
Question 5	Yes	No	Total answered	% Yes	
Have you shared any knowledge or skills you have obtained through the EACFFPC training with your colleagues?	115	3	118	97.5%	
Question 6	Yes	No	Total answered	%Yes	
Do you feel you have experienced improved engagement with border agencies (e.g. customs) since undertaking this EACFFPC training?	87	20	107	81.3%	

6.18 As can be seen from Table 10 above, 100% of the 127 graduates who responded to the first question of the survey said the training provided them with new and/or improved knowledge and skills, which is a unanimously positive response indicating that the course has increased the capacity of these graduates. 83% of respondents said that the training was regularly useful in helping them to do their job better, indicating that the training proved to be highly useful and applicable for those graduates in their day to day operations.



- 6.19 Over 90% of respondents confirmed that the training has helped them to provide a quicker service to their clients (importers and exporters), while over 80% of respondents confirmed that the training has helped them to offer a lower cost service to their clients.
- 6.20 Interestingly, question 5 shows that nearly all respondents have shared their learning with colleagues, which would imply a sort of ‘multiplier effect’ on the benefits of training each individual graduate. This multiplier effect would need to be investigated further but this subsequent peer to peer knowledge sharing and learning is an interesting and potentially important outcome of the training project which was not originally envisaged.
- 6.21 Finally, question 6 indicates that over 80% of respondents have enjoyed improved engagement with border agencies since undertaking the course, implying that the course has helped to improve the level of communication between these key counterparts in the cross-border clearance and cargo release transaction.
- 6.22 The results of this survey were largely echoed in the findings from the semi-structured interviews with graduates – see previous summary earlier in this section of the report.
- 6.23 Finally, when looking at the effectiveness of the project in realising the intended outcomes, it was important to examine the intended outcome of making EACFFPC training and certification compulsory for clearing and forwarding firms to be granted their operating licences.
- 6.24 The EACFFPC High Level Policy Forum (which includes senior representatives from the national revenue authorities, national freight forwarding associations, and FEAFFA) met in August 2011 and then again in December 2013. During these meetings, revisions to the EACFFPC implementation policy framework were made with the forum adopting the EACFFPC as part of the requirements for licencing appears to be in operation across the EAC
- 6.25 However, this certification requirement seems to vary in nature across particular countries of the EAC. For example, in Rwanda the requirement is for clearing and forwarding firms to have at least two members of staff responsible for clearance of goods holding a diploma or certificate in customs training from a recognized institute, while in Tanzania the requirement is for firms to have two directors/employees who possess the East African Customs Clearing and Freight Forwarding Practising Certificate specifically. In Kenya, licencing officials at Kenya Revenue Authority informed us that only new licence applications are required to demonstrate that they have at least two employees with an accredited diploma or certificate in customs, but firms who are renewing their licence are not asked to demonstrate evidence of employees’ certification.
- 6.26 The practicalities of implementing this form of mandated training for the purposes of licencing are not straightforward. For example, it is the firm that is licenced but individual employees that are trained and certified. This creates a complex requirement for tracking the employment status of the trained individuals. It also requires an arbitrary line to be drawn on the number of employees per firm who are expected to be certified in order for the firm to be licensed. At present this line is drawn at two employees per firm. In a five person firm, this would represent 40% of employees but in a 100 person firm it represents only 2% of employees. The relative cost



burden for those smaller firms is higher than the cost burden for larger operators, creating an unequal bias in favour of larger companies.

- 6.27 The target of two employees per firm, estimated as 4,500 individuals in total, was set both as an indicator for the coverage of the EACFFPC itself as well as a trigger for revenue authorities to begin implementing this obligatory certification for licensing policy. We have seen no reliable estimates of the total number of individuals working in the forwarding and clearing sector in the region so it is not possible to assess what level of industry coverage this figure of 4,500 graduates actually represents. With this in mind, it is difficult to identify a robust justification for why the figure was used as a trigger point for implementing the licensing policy.
- 6.28 In some cases there are political barriers to the effectiveness of this policy. For example, in Tanzania we were informed by TRA officials that it would be politically impossible for TRA to withdraw a company's operating licence on the basis that they do not have two certified employees on the books.
- 6.29 Directly linking the licensing to EACFFPC certification, as is explicitly the case in Tanzania, also raises concerns relating to competition in the training market. At present only national revenue authorities in association with national freight forwarding associations are able to deliver an accredited EACFFPC course. This appears to represent a significant barrier to entry in the training market for any company wishing to provide this training.
- 6.30 The embedded results logic in this project is that the mandatory certification for licensing policy would help to drive demand for the training. This is self-explanatory, if it becomes a requirement in order to operate then operators will seek out the training and certification. From the semi-structured interviews with graduates, it does appear that for some, this was a factor in why they undertook the training. However, the overwhelming motivation was actually to acquire improved knowledge and skills. Given the concerns around the functioning of the policy raised above, it is highly questionable as to whether this policy has driven demand up to this point, or will do so in the future.

If gender mainstreaming targets were set at project inception, to what extent were targets achieved, and what were the successes and challenges?

- 6.31 From the project documentation it is not clear that any gender mainstreaming targets were set for the project. The project appraisal report, TMEA's formal project scoping document which sets out the rationale for funding the project, talks about the "training activities pay(ing) special attention to women participation and training data disaggregated by gender." This demonstrates a recognition that gender mainstreaming should be factored into the project but it is not clear that gender mainstreaming has actually been factored in.
- 6.32 No gender mainstreaming targets or indicators have been set or tracked throughout the project. However, some effort has been made to disaggregate relevant project monitoring data by gender i.e. the number of men and women trained. Although this recorded data, as described earlier in the report, appears to be inconsistent and incomplete. The most complete data seems to suggest a total of 4063 people graduated in total, plus 248 people who were given an



equivalent 'certificate of competence', of which 3183 were men and 1128 were women. Assuming these numbers are accurate, then around 26% of those trained are women.

- 6.33 No evidence was found on the number of men and women working as forwarding and clearing agents in the region, making it impossible to state with any certainty what the 26% / 74% of women to men trained implies in terms of (in)equality of access to the EACFFPC training by gender. However, the accepted perception amongst stakeholders of this project is that the clearing and forwarding sector is male-dominated and that the relative representation of women is higher than perhaps expected.
- 6.34 However, some evidence of unequal access for women was found from the semi-structured interviews with graduates. Some of the female and male graduates in Kenya and Tanzania felt that the location and/or the timing of the training proved a barrier to women's participation. The location of training, in particular at the KESRA and ITA training centres in Mombasa and Dar es Salaam, was cited as being too far from the main residential areas of the cities. This combined with the training (for those taking the course part-time) being in the evenings, meant that some women felt insecure in undertaking the journey to and from the training centres. The evening timing of the training was also cited as being particularly difficult for women relative to men due to women's domestic commitments at that time of day.

Summary of findings around the effectiveness of the EACFFPC project

- 6.35 Evidence gathered from semi-structured interviews with EACFFPC graduates and national revenue authorities (customs officials) supports a conclusion that ***the objective to achieve a higher standard of services across the freight forwarding industry in East Africa has been met to some extent by the EACFFPC training and certification initiative.***
- 6.36 While it is difficult to be conclusive as to what extent the objective has been met by the EACFFPC, ***those interviewed were unanimously positive about the increased standard of services as a result of the EACFFPC training.***
- 6.37 ***Analysing the project administrative (monitoring) data should have allowed for clear assessment progress against certain intended outcomes. However, this has not been the case because of the incoherence and inconsistencies present in the project monitoring data.***
- 6.38 ***The most complete data seems to suggest a total of 4063 people graduated, plus 248 people given an equivalent 'certificate of competence', of which 3183 were men and 1128 were women. If these numbers are correct, and there is no way of reasonably verifying these numbers in the context of this evaluation, the project appears to have come very close to meeting its target of 4,500 freight forwarders/ clearing agents trained, the so-called "critical mass" of trainees.***
- 6.39 A survey of EACFFPC graduates was conducted in which:
- ***100% of respondents said the training provided them with new and/or improved knowledge and skills;***



- **83% of respondents said that the training was ‘regularly useful’ in helping them to do their job better**, indicating that the training proved to be highly useful and applicable for those graduates in their day to day operations.
- **Over 90% of respondents confirmed that the training has helped them to provide a quicker service to their clients (importers and exporters)**
- **80% of respondents confirmed that the training has helped them to offer a lower cost service to their clients.**
- **nearly all respondents have shared their learning with colleagues, which would imply a sort of ‘multiplier effect’ on the benefits of training each individual graduate.** This multiplier effect would need to be investigated further but it this subsequent peer to peer knowledge sharing and learning is an interesting and potentially important outcome of the training project which was not originally envisaged.
- **over 80% of respondents have enjoyed improved engagement with border agencies** since undertaking the course, implying that the course has helped to improve the level of communication between these key counterparts in the cross-border clearance and cargo release transaction.

6.40 After looking into the intended outcome of making EACFFPC training and certification compulsory for clearing and forwarding firms to be granted their operating licences, the evaluation found **the obligatory certification requirement varies across particular countries of the EAC and the practicalities of implementing this form of mandated training for the purposes of licencing are complex.** It creates the need for an arbitrary line to be drawn on the number of employees per firm who are expected to be certified in order for the firm to be licensed. At present this line is drawn at two employees per firm. In a five person firm, this would represent 40% of employees but in a 100 person firm it represents only 2% of employees. **The relative cost burden for those smaller firms is higher than the cost burden for larger operators, creating an unequal bias in favour of larger companies.** At present only national revenue authorities in association with national freight forwarding associations are able to deliver an accredited EACFFPC course. **There appears to represent a significant barrier to entry in the training market for any company wishing to provide this training.** Semi-structured interviews with EACFFPC graduates found that the overwhelming motivation for undertaking the course was actually to acquire improved knowledge and skills not the fact that it was made to be mandatory requirement for firms to have certified staff. **Given the concerns around the functioning of the policy raised above, it is highly questionable as to whether this policy has driven demand up to this point, or will do so in the future.**

6.41 While there has been a recognition that gender mainstreaming should be factored into the project but **it is not clear that gender mainstreaming has actually been factored in. No gender mainstreaming targets or indicators have been set or tracked throughout the project.**

6.42 **Some evidence of unequal access for women was found from the semi-structured interviews with graduates.**



Relevance

7.1 In investigating relevance in this project, the main evaluation question being posed is

(5) Does this project address the main challenges in the effectiveness of the logistics sector in East Africa?

7.2 In addition to investigating whether the project is well aligned with the challenges in the effectiveness of the logistics sector in East Africa, the evaluation has sought to investigate:

- whether the project is relevant to the needs of the importers / exporters and freight forwarders / clearing agents
- Whether the intervention is well in tune with the context of EAC trading systems and norms
- Whether the activities, outputs, outcomes are consistent with the objective and intended impact
- Whether there was a monitoring, evaluation and learning (MEL) system in place, integrated in the project cycle and used to make project management decisions.

7.3 Evidence has been gathered from semi-structured interviews with project participants, a review of project administrative data and reporting, and an expert analysis of the training materials and curriculum.

7.4 The rationale for TMEA's support to this training project is captured in the project appraisal report. In this report there is a reasonably coherent summary explaining why it is believed that increasing the standard of freight forwarding and clearing services in East Africa could help to increase the effectiveness and efficiency of the region's logistics sector more broadly. However, this rationale is not supported by any evidence-based analysis of whether the standard of services provided by forwarding and clearing agents is a key determinant of an effective and efficient logistics sector. In this evaluation our semi-structured interviews with project stakeholders and beneficiaries explored this question.

7.5 From these interviews, it was clear that all stakeholders (TMEA, FEAFFA, national freight forwarding associations, revenue authorities) and a significant proportion of beneficiaries (EACFFPC graduates) believe that increasing the standard of services of clearing and forwarding agents in the region is likely to increase the efficiency and effectiveness of the logistics sector in East Africa. The primary anticipated mechanism for this change was consistently cited as being centred around improved clearing and forwarding agents' increasing compliance with customs declaration requirements, leading to reduced time taken and reduced costs in clearance of goods, and in turn a more effective and efficient logistics sector.

7.6 The semi-structured interviews with EACFFPC graduates, the results of the perception survey of graduates, and the stories of significant change collected during this evaluation all provide evidence that the forwarding and clearing agents themselves are experiencing improved standard in their service delivery as a result of the training, and that that higher standard of



service is perceived to be contributing to reduced clearance times and associated costs to traders. Assessing the extent to which improvements in the logistics sector can be attributed to this enhanced standard for freight forwarding and clearing services would require a much more involved and resource intensive study than is possible in the context of this evaluation.

- 7.7 The survey results indicate that the training was relevant to the requirements of those respondents, with 100% of respondents saying the training provided them with new and/or improved knowledge and skills, over 80% saying the training as regularly useful to them in their jobs, and over 80% of respondents saying it has helped them to provide quicker and lower cost services to their clients.
- 7.8 In this evaluation it was not possible to meet with a sample of importers/ exporters, as had been hoped. This was not possible for a combination of reasons, including: the fact that no readily available contact information for importers / exporters serviced by EACFFPC graduates was available; contact details were not available for many EACFFPC graduates themselves, through whom it may have been possible to contact importers / exporters serviced by those graduates; no previous efforts had been made to engage with this group of beneficiaries (importers / exporters) during the EACFFPC project, making it difficult to readily identify importers / exporters sufficiently engaged / willing to participation in the evaluation process; and It proved challenging to obtain agreement from EACFFPC graduates for the evaluation team to access the contact details of their clients. It is consequently difficult to make an assessment of the extent to which this project is relevant to their needs.
- 7.9 In helping to assess the relevance of the project, in terms of meeting needs of its intended beneficiaries and in terms of how well the intervention is aligned with both the prevailing trading systems and procedures in East Africa and to the priorities challenges of the logistics sector in the region, we have undertaken an expert review of the EACFFPC training curriculum and materials. The full review can be read in Annex D.
- 7.10 Currently, the emphasis, in relation to time allocation, is on customs to the detriment of important freight forwarding knowledge and skills which are essential in relation to EAC traders realising export potential/competitiveness and controlling the cost of imports. Generally, the customs elements of the curriculum, and the related training manuals, are more detailed and accurate than the other sections. The EACFFPC is, arguably, not sufficiently meeting the need in the region for increased knowledge, skill and proficiency in freight forwarding.
- 7.11 In its current format, EACFFPC is a good test of the proficiency of customs declarants in the clearing and freight forwarding professions but the freight forwarding section only provides 'awareness level' knowledge. It should be clear the course does not 'qualify' participants in core technical areas such as handling hazardous goods (for which internationally recognised training and qualification is required), Incoterms nor export payments (such as providing advice on letters of credit and generation of compliant documentation).
- 7.12 Finally, when thinking about the 'relevance' evaluation criterion it is also important to understand what monitoring, learning and evaluation systems have been in place for the project implementers to analyse the continuing relevance of the project and feed this learning into



project management decisions. From our review of project documents and consultations with project implementers, there is evidence of some form of regular reporting mechanisms on project progress. However, in our view, there is little or no evidence of sufficient focus on ongoing monitoring, evaluation and learning, with a view to feeding this information into project decision-making. Monitoring information was scattered and inconsistent in nature and no substantial formative reviews of the project have been undertaken before this summative evaluation was commissioned. This will have negatively affected the project implementation team's ability to ensure the relevance of the project.

Summary of key findings around the relevance of the EACFFPC project

- 7.13 From the semi-structured interviews conducted, it was clear that ***all stakeholders (TMEA, FEAFFA, national freight forwarding associations, revenue authorities) and a significant proportion of those beneficiaries (EACFFPC graduates) interviewed believe that increasing the standard of services of clearing and forwarding agents in the region is likely to increase the efficiency and effectiveness of the logistics sector in East Africa.***
- 7.14 *The semi-structured interviews with EACFFPC graduates, the results of the perception survey of graduates, and the stories of significant change collected during this evaluation all provide evidence that the **forwarding and clearing agents themselves are experiencing improved standard in their service delivery as a result of the training, and that that higher standard of service is perceived to be contributing to reduced clearance times and associated costs to traders.***
- 7.15 ***Survey results indicate that the training was relevant to the requirements of those respondents***, with 100% of respondents saying the training provided them with new and/or improved knowledge and skills, over 80% saying the training was regularly useful to them in their jobs, and over 80% of respondents saying it has helped them to provide quicker and lower cost services to their clients
- 7.16 ***Currently, the emphasis of the curriculum and training materials, in relation to time allocation, is on customs to the detriment of important freight forwarding knowledge and skills which are essential in relation to EAC traders realising export potential /competitiveness and controlling the cost of imports.*** Generally, the customs elements of the curriculum, and the related training manuals, are more detailed and accurate than the other sections. ***The EACFFPC is, arguably, not sufficiently meeting the need in the region for increased knowledge, skill and proficiency in freight forwarding.***
- 7.17 ***There is little or no evidence of sufficient focus on ongoing monitoring, evaluation and learning, with a view to feeding this information into project decision-making.*** This will have negatively affected the project implementation team's ability to ensure the relevance of the project.

Sustainability

8.1 In investigating the sustainability of the project the main evaluation questions posed are:



(6) What benefits (institutional, technical, financial, economic, gender equality) are likely to continue beyond the life of the project, even without TMEA?

(7) What are the lessons learned relating to sustainability?

- 8.2 In investigating evidence around sustainability, the evaluation team has looked at:
- Evidence of increased organisational capacity and capacity to sustain any gains
 - Evidence of alignment between project and implementing partners' respective priorities
- 8.3 The implementation network for the EACFFPC project is outlined in the stakeholder analysis presented earlier in this report. During the semi-structured interviews with project stakeholders the question of how sustainable is the role of the respective stakeholders and the network as a whole was investigated.
- 8.4 TMEA funding for the project ended in 2014, however, the EACFFPC training project is continuing to some extent without this funding. Training and certification continues in all three countries visited during this evaluation i.e. Kenya, Tanzania, and Rwanda. This finding alone would indicate there is a level of success in terms of the sustainability of the project. However, this picture of sustainability is varied across the region.
- 8.5 In Kenya, KESRA (who deliver the majority of training in Kenya) have indicated that class intakes are now significantly lower than was the case in recent years. The reasons for this are somewhat unclear, however, one explanation could be that the national training coordinator who was based in KIFWA, and responsible for coordinating the marketing and communications around the training course, was not retained following the end of TMEA funding.
- 8.6 In Tanzania, the training course is offered by both ITA and TAFFA. At ITA, the training has continued at a similar frequency and reach (in terms of trainee numbers) since TMEA's funding ceased. However, at TAFFA there were greater concerns about sustainability. These concerns centred around the view that the price will have to increase to cover the costs of delivering the training. Interestingly the national training coordinator was in place at TAFFA but was funded by the World Bank on a separate one year programme. Without this training coordinator TAFFA will likely struggle to maintain the same level of training provision.
- 8.7 In Rwanda, the training appears to be continuing in much the same way as it was under TMEA funding. In Rwanda, the national freight forwarding association ADR delivers the training to its members and envisages the course offer continuing strongly. Although some concerns were also raised regarding the impact of increasing the price of training (which was viewed as likely to be needed in the near future) making the course prohibitive to some forwarders/ clearing agents.
- 8.8 There have been benefits in terms of sustainability for individual institutions involved in the EACFFPC project, as follows:



- **FEAFFA:** There is a greater awareness of FEAFFA across the region and FEAFFA now enjoys a better relationship and increased credibility with the Revenue Authorities and the EAC Secretariat.
- **National freight forwarder associations:** All the national associations interviewed (in Rwanda, Kenya and Tanzania) reported sustainable benefits from involvement in the EACFFPC.

ADR felt that recognition of the association has increased substantially, by its members as well as the revenue authority, that collaboration between ADR and RRA has improved substantially, and ADR is well respected now. ADR now has a legally incorporated training centre in Kigali that has become a fully-fledged training centre with adequate training facilities and equipment used by freight forwarders as well as the revenue authority. ADR received an award from the Private Sector Federation for being the most successful association in Rwanda.

KIFWA has witnessed a reduced demand for dispute resolution intervention on behalf of their members as a result of the impact of the training in increasing the knowledge and skills of their members, which has created time for the association to undertake other activities relating to its mandate of advocacy and training. The marketing of the EACFFPC course has helped KIFWA to recruit members and its membership has risen.

TAFFA cited improved engagement with TRA and an increased profile and credibility with its members.

- **Revenue authority training institutes:** KESRA has experienced an increase in its profile in Kenya and regionally. KESRA has long held an ambition to offer training outside of KRA. The KRA Commissioner General reportedly has an ambition to transform KESRA into a University of Fiscal Policy in 5 years. ITA reported that the EACFFPC course has helped to generate more income for ITA. It has also helped ITA to support TRA's objectives of increasing customs compliance from clearing agents and facilitating trade. The EACFFPC has also helped ITA to raise ITA's profile in the region

8.9 These institutional benefits are important and should be viewed as successes from a sustainability perspective. However, there is a serious sustainability concern identified with regard to some of these institutions and their role in the EACFFPC training and certification network, namely FEAFFA and the some of the national training institutions.

8.10 Despite its lead role in setting up and coordinating the EACFFPC, FEAFFA does not, as yet, generate revenue from any sustainable sources relating to the EACFFPC. FEAFFA's financial gains from EACFFPC have been solely linked to the grant funding from donors, most recently TMEA. An example of this lack of financial sustainability is the fact that the regional training coordinator employed by TMEA to be based at FEAFFA was not retained by FEAFFA when the TMEA funding ceased in 2014.

8.11 Similar financial sustainability concerns are present among the national freight forwarding associations, with the exception of ADR in Rwanda. In Kenya, training fee revenue is collected



by KRA (via KESRA), who periodically make payments to KIFWA to cover some of the cost incurred by KIFWA in marketing and coordinating the course, as well as the cost of some training services delivered by KIFWA affiliated experts. This does not provide a source of income with which KIFWA can sustain itself and its role in the EACFFPC. Again, the national training coordinator in Kenya was not retained by KIFWA following the end of TMEA funding. In Tanzania, TAFFA is struggling to cover its costs in the running of the training course and only retains a training coordinator because of World Bank funding on a separate institutional strengthening grant. TAFFA's training centre is also an unaccredited training centre, primarily because of TAFFA's inability to finance a secure lease or purchase of training premises.

- 8.12 In Rwanda, ADR's involvement in EACFFPC is on a much more sustainable footing because they generate all revenue from the EACFFPC, paying RRA fees for provision of customs trainers. In all other EAC countries, the training delivery and certification is led primarily by the training institutes affiliated with the national revenue authorities.
- 8.13 From one perspective, it is understandable that FEAFFA and its donors pragmatically chose to utilise the existing institutional strength of the revenue authorities for rolling this EACFFPC training out. From another perspective, it is fairly unusual for government agencies to be providing private sector, industry leading professional training and certification. In many other countries, it is the national freight forwarding associations who lead on the training and certification of their members (see <http://www.bifa.org/content/Training.aspx> for example). Indeed, it is one of only a small number of viable and sustainable revenue generation streams for membership-based private sector associations. This is the delivery model which has been taken up in Rwanda, seemingly to strong and sustainable success.
- 8.14 This tension around the future of 'ownership' or lead responsibility for delivering the EACFFPC is something that will need to be proactively addressed in the coming months and years. Already there are emerging coordination issues between actors, for example in Kenya the most recent cadre of trainees have not had graduation ceremonies because of a dispute between KIFWA and KESRA on who should be the agency responsible for graduating trainees.
- 8.15 The nature and sustainability of the implementation network is also importantly linked to the discussion above regarding the relevance of the EACFFPC curriculum and training materials to the needs of the sector. It is clear that the curriculum and training materials are heavily weighted to customs clearance matters. With this bias in mind, there is some logic in the revenue authorities having a major role in the training and certification process. However, it is the view of this evaluation, that the EACFFPC should, in order to be truly recognised as a practicing accreditation for freight forwarders, rebalance the curriculum so that the primary focus is on wider freight forwarding and freight logistics knowledge and skills with a secondary focus on customs clearance. In this scenario, it would be appropriate for the freight forwarding associations in the region to be the lead agents offering the training and certification to their members.
- 8.16 Even without this rebalancing of the curriculum and training materials, it is arguably still appropriate from the perspective of the sustainability of the EACFFPC and the institutions involved for the EACFFPC to be offered as a revenue generating product by the freight



forwarding associations, who could then hire in any customs training expertise from the revenue authorities as required.

Summary of key findings around sustainability of the EACFFPC project

- 8.17 TMEA funding for the project ended in 2014, however, the EACFFPC training project is continuing to some extent without this funding. This finding alone indicates ***there is a level of success in terms of the sustainability of the project. However, this picture of sustainability is varied across the region.***
- 8.18 There have been ***benefits in terms of sustainability for individual institutions*** involved in the EACFFPC project.
- 8.19 There is ***a serious sustainability concern identified with regard to some of these institutions and their role in the EACFFPC training and certification network, namely FEAFFA and the some of the national training institutions.***
- 8.20 ***Despite its lead role in setting up and coordinating the EACFFPC, FEAFFA does not, as yet, generate revenue from any sustainable sources relating to the EACFFPC.*** FEAFFA's financial gains from EACFFPC have been solely linked to the grant funding from donors, most recently TMEA.
- 8.21 ***Similar financial sustainability concerns are present among the national freight forwarding associations, with the exception of ADR in Rwanda.*** In Rwanda, ADR's involvement in EACFFPC is on a much more sustainable footing because they generate all revenue from the EACFFPC, paying RRA fees for provision of customs trainers. In all other EAC countries, the training delivery and certification is led primarily by the training institutes affiliated with the national revenue authorities.
- 8.22 It is unusual for government agencies to be providing private sector, industry leading professional training and certification. In many other countries, it is the national freight forwarding associations who lead on the training and certification of their members. ***This tension around the future of 'ownership' or lead responsibility for delivering the EACFFPC is something that will need to be proactively addressed in the coming months and years.***
- 8.23 ***It is arguably most appropriate from the perspective of the sustainability of the EACFFPC and the institutions involved for the EACFFPC to be offered as a revenue generating product by the freight forwarding associations, who could then hire in any customs training expertise from the revenue authorities.***

Efficiency

9.1 In order to assess efficiency in this project, the main evaluation question posed is:

(8) To what extent and how has the intervention been effective and achieved good VFM?

9.2 To investigate the evidence of efficiency, the evaluation team attempted to look at:



- Evidence of VFM economy savings / overspend throughout project lifetime
- EACFFPC spend per graduate trained over time
- Total project costs compared with evidence of increased standard of freight forwarding services in the region
- How efficient and effective were the management and administration systems and procedures including communication, programme results framework and reporting?

Evidence of VFM economy savings / overspend

9.3 It has not been possible to evaluate the extent to which VFM economy savings have been realised because a) no budget information has been provided showing project costs broken down beyond single aggregate (annual and total) project cost figures, and b) no tracking of VFM economy savings or metrics has been undertaken by the project management team (i.e. TMEA and FEAFFA) during project delivery.

TMEA's spend per EACFFPC graduate

9.4 TMEA's budgeted spend on the EACFFPC project, according to figures provided by TMEA, was US\$2,073,865. The actual spend, from June 2011 to March 2015 was US\$2,126,458 (it is unclear from the limited budget information received precisely what accounts for this overspend). As mentioned earlier in this report, the number of people graduating from the EACFFPC course is not definitively clear, however if we take the most complete data set received on the number of men and women trained over time as being accurate we can conclude that 4023 people have graduated from the EACFFPC project between 2007 and 2014, as shown in Table 11 below.

Table 9: Number of EACFFPC graduates over time (according to FEAFFA monitoring data)

Year	2007	2008	2009	2010	2011	2012	2013	2014 ¹⁴	Total
No. of graduates	37	436	500	472	410	632	1200	336	4023

9.5 If we assume that TMEA's funding has contributed to producing EACFFPC graduates from mid-2011 to mid-2014, we can estimate that TMEA funding has helped to train 2,373 freight forwarders and clearing agents. This represents 59% of the total number of graduates. This is an average of 678 graduates per year under TMEA funding compared to 367 graduates per year before TMEA funding.

9.6 It is not possible to make a judgement on whether TMEA's investment represents more efficient VFM than the investment of previous donor organisations into the EACFFPC project as data on previous donor investment was not available. However, we can say that TMEA funding has

¹⁴ Figures for 2014 cover up to mid-2014 only



helped to realise an *additional* 311 EACFFPC graduates per year. This equates to 1089 *additional* graduates from June 2011 to end of 2014.

- 9.7 According to the financial spend by TMEA and the numbers of people trained outlined above, the TMEA spend per EACFFPC graduate (of the 2,373 graduating during the period of TMEA support) is calculated as US\$ 896. In terms of the added value in numbers of graduates per year under TMEA funding versus the prevailing annual average before TMEA support began, the TMEA spend per *additional* graduate is US \$ 1,953.
- 9.8 The course fee paid by an individual trainee in Kenya is currently KES 60,000 and in Tanzania it is TSZ 880,400, which equates to approximately US\$ 636 and US\$ 465 respectively (based on April 2015 exchange rates).
- 9.9 Taken together, these figures would suggest that TMEA has heavily subsidised the real cost of EACFFPC training and certification per EACFFPC graduate. This reinforces the concerns raised earlier in the report about the sustainability of the EACFFPC project post-TMEA funding.
- 9.10 Interestingly, when considering the VFM of the training course from the perspective of the EACFFPC graduates, in our perception survey of graduates, 83% of respondents stated that they considered the course to be either good or excellent VFM.

VFM efficiency and effectiveness

- 9.11 Whether this TMEA spend per (additional) EACFFPC graduate represents VFM from the perspective of efficiency or effectiveness is not possible to determine because of a lack of data available, such as:
- a breakdown of TMEA spend per project activity / outcome
 - project data on VFM economy savings or VFM efficiency metrics
 - detailed information on scale of time / cost savings enjoyed by traders as a result of EACFFPC training

Summary of project management and administration

- 9.12 From the project reporting and discussions with key stakeholders, it appears that key project activities funded by TMEA were, overall, delivered in a timely manner. The management and administration of the curriculum development process was highlighted by various stakeholders as being particularly efficient and effective.
- 9.13 Some concern was raised by FEAFFA about the timeliness of TMEA's extended funding for the EACFFPC initiative to cover the first two quarters of 2014. This caused delays in payment of project staff salaries (e.g. FEAFFA personnel and training coordinators). This serves to highlight again, from a sustainability perspective, the extensive reliance on donor funding for effective project operations.



- 9.14 As highlighted earlier in this report, the EACFFPC project has had a relatively diffuse and complex training implementation network. In each country there is a national curriculum implementation committee responsible for oversee the training and certification and headed by the national revenue authority and national freight forwarding association. This committee based executive management of the training and certification has been effective to the extent that it has helped to ensure the buy-in and cooperation of the revenue authorities, their training institutes and the national freight forwarding associations.
- 9.15 However, this implementation network has also contributed to some inefficiencies in project management and administration. In Kenya, for example, both KESRA and KIFWA commented on a frustration that NCIC decisions on important matters such as approving the release of payments to cover training operating costs or reviewing and releasing exam results to students (in the case of the latter it has, in certain instances, taken over a year to release results to students). These delays have reportedly had a demoralising effect on training staff who remain unpaid longer than anticipated or students who do not receive their results in a timely manner.
- 9.16 These coordination challenges are also important in the context of the earlier discussion around the sustainability of the implementation network for the EACFFPC. This complex multi-intuitional committee based executive management may not be sustainable in terms of ensuring efficient management operations in the context of a fee-for-service operated training course, particularly given the removal of donor subsidy.
- 9.17 It was also evident from semi-structured interviews with organisation in the training implementation network that the training administration (such as the student database) is in some cases manual in nature and not computer-based. This makes effective project administration and monitoring even more time and cost intensive.
- 9.18 In terms of project risk management, there does not appear to have been a suitable systematic management of risk in the project. The range of project risks at activity, output, outcome and impact level do not appear to have been regularly identified and reviewed with appropriate risk mitigation approaches put in place. A small number of risks appear to have been occasionally identified in the reporting but risks not sufficiently identified, mitigated and monitored in a systematic and thorough manner.
- 9.19 Project monitoring and reporting was largely activity focused in nature, lacking sufficient focus on project outcomes. Data management, both planning and execution, was poor throughout the project. When gathering existing project monitoring and administrative data during this evaluation, it was discovered that important data was not readily available at the beginning of this evaluation, or attainable by the end; data which would reasonably have been expected to be available. Examples include:
- Consistent and clear data on the number of people enrolled on, dropped out of, failed or graduated from the EACFFPC training course in all five participating countries, disaggregated by men and women, and by year.
 - Clear and consistent data on the number of trainers trained under the project.



- The names and contact details of all EACFFPC trainees (including graduates, drop outs and those who failed the course). For example, no contact details were available for any of the hundreds of graduates trained in Kenya or Tanzania.
- Completed training feedback forms from EACFFPC trainees;
- The number of freight forwarding firms in East Africa, ideally disaggregated by men and women (e.g. number of male/female employees per firm, or number of male/female owned firms)
- The number of firms in the region with EACFFPC trainees / graduates as employees
- Secondary data sets, or monitoring data, on number of declaration errors made by clearing agents over time from one or more of the national revenue authorities
- No data on who the importers / exporters are who stand to benefit from the increased standard of freight forwarding and clearing services (i.e. the clients of the EACFFPC graduates)
- Clear budget information on what TMEA spend on this EACFFPC project was over time broken down by either spend at the key activity level or spend at the output or outcome level.
- Any VFM tracking or monitoring data, ideally against pre-defined VFM metrics for the project.

Summary of key findings around efficiency of the EACFFPC project

9.20 ***It has not been possible to evaluate the extent to which VFM economy savings have been realised*** because no budget information has been provided showing project costs broken down beyond aggregate figures and no tracking of VFM economy savings or metrics has been undertaken by the project management team (i.e. TMEA and FEAFFA) during project delivery.

9.21 During the period of its funding, ***TMEA has helped to train an estimated 2,373 freight forwarders and clearing agents. This represents 59% of the estimated total number of graduates, equating to an average of 678 graduates per year under TMEA funding compared to 367 graduates per year before TMEA funding began.*** TMEA funding has helped to realise an additional 311 EACFFPC graduates per year, equal to 1089 *additional* graduates from June 2011 to end of 2014.

9.22 The TMEA spend per EACFFPC graduate (of the estimated 2,373 graduating during the period of TMEA support) is estimated as being US\$ 896. The course fee paid by an individual trainee in Kenya is currently KES 60,000 and in Tanzania it is TZS 880,400, which equates to approximately US\$ 636 and US\$ 465 respectively (based on April 2015 exchange rates). Taken together, ***these figures suggest that TMEA has heavily subsidised the real cost of EACFFPC training and certification per EACFFPC graduate.*** This reinforces the concerns raised earlier in the report about the sustainability of the EACFFPC project post-TMEA funding.



- 9.23 ***It has not been possible to assess whether the TMEA spend per (additional) EACFFPC graduate represents VFM from the perspective of efficiency or effectiveness because of a lack of available data***, such as: a breakdown of TMEA spend per project activity / outcome; project data on VFM economy savings or VFM efficiency metrics; detailed information on scale of time / cost savings enjoyed by traders as a result of EACFFPC training.
- 9.24 ***Key project activities funded by TMEA were, overall, delivered in a timely manner.***
- 9.25 ***The EACFFPC project has had a relatively diffuse and complex training implementation network which has been effective in some ways but has also created inefficiencies and risks around sustainability.*** This committee based executive management has been effective in that it has helped to ensure the buy-in and cooperation of the revenue authorities, their training institutes, and the national freight forwarding association. However, it has also contributed to some inefficiencies in project management and administration such as approving the release of payments to cover training operating costs or reviewing and releasing exam results to students.
- 9.26 In terms of project risk management, ***there does not appear to have been a suitable systematic management of risk in the project.***
- 9.27 ***Project monitoring and reporting was largely activity focused in nature, lacking sufficient focus on project outcomes. Data management, both planning and execution, was inadequate throughout the project.***



Conclusions and recommendations

Summary of key findings

10.1 This section summarises the **25 key findings** emerging from this summative evaluation.

FINDING 1: The EACFFPC appears to be having a positive impact on the service standards of freight forwarders and clearing agents, which is taking place in the context of falling clearance and release times in the region.

10.2 The qualitative evidence collected in the most significant stories of change indicates that individuals trained have experienced a strong positive impact from the EACFFPC in helping them to improve the quality, timeliness and cost of their services. These individuals attribute this impact to the EACFFPC. It is impossible to say with certainty that these changes would not have occurred without the EACFFPC project, but it seems unlikely given that no direct equivalent to this EACFFPC training and certification exists in the region.

10.3 The evidence from these stores of change regarding the increased efficiency and effectiveness of freight forwarders / clearing agents services to importers/exporters is echoed in the results of our survey of EACFFPC graduates, which found the large majority of survey respondents feel the training has helped them to offer a quicker and lower cost service to their clients (importers / exporters). The survey found that 92.4% of survey respondents felt the EACFFPC training helped them to offer a quicker service to their clients (i.e. importers / exporters), while 81.5% believe the EACFFPC training has helped them to offer a lower costs service to their clients.

10.4 From the review of previous studies on clearance and release times at border points in the region and looking at the World Bank indicators on Doing Business in the region, there does appear to be a downward trend in the time taken for goods to be cleared/ released at border points in the region over recent years. There is no evidence in these studies that this downward change is a result of increased standard of services in the freight forwarding and clearing industry however.

10.5 A review of a previous study (Kessler, 2012) into the links between EACFFPC training and the number or errors committed by freight forwarders/ clearing agents finds that firms employing EACFFPC graduates do appear to make fewer errors in their customs declarations. Although it is not possible to comment on what extent the training is the cause of the reduced number of errors by trained staff.

10.6 None of these data points individually represent clear and convincing evidence of the EACFFPC's measurable impact on a more effective logistics sector in the region, or the extent to which such impact can be attributed to the EACFFPC. However, from triangulating the data points it is possible to say that the EACFFPC appears to be having a positive impact on the standards of key actors in the logistics sector (i.e. forwarders and clearing agents) and this positive impact is happening in the context of falling clearance and release times in the region.



FINDING 2: Evidence gathered supports a conclusion that the objective to achieve a higher standard of services across the freight forwarding industry in East Africa has been met to some extent by the EACFFPC training and certification initiative.

- 10.7 Evidence gathered from semi-structured interviews with EACFFPC graduates and national revenue authorities (customs officials) supports a conclusion that the objective to achieve a higher standard of services across the freight forwarding industry in East Africa has been met to some extent by the EACFFPC training and certification initiative. While it is difficult to be conclusive as to what extent the objective has been met by the EACFFPC, those interviewed were unanimously positive about the increased standard of services as a result of the EACFFPC training.
- 10.8 This finding is supported by evidence from the survey of EACFFPC graduates in which more than 90% of respondents confirmed that the training has helped them to provide a quicker service to their clients (importers and exporters) and 80% of respondents confirmed that the training has helped them to offer a lower cost service to their clients.
- 10.9 Over 80% of respondents to the survey of EACFFPC graduates confirmed that they have enjoyed improved engagement with border agencies since undertaking the course, indicating that the training may have helped to improve the level of communication between these key counterparts in the cross-border clearance and cargo release transaction.

FINDING 3: According to the most complete data set, the outcome of a “critical mass” of freight forwarders and clearing agents trained has almost been achieved.

- 10.10 The most complete data seems to suggest a total of 4063 people graduated, plus 248 people given an equivalent ‘certificate of competence’, of which 3183 were men and 1128 were women. If these numbers are correct, and there is no way of reasonably verifying these numbers in the context of this evaluation, the project appears to have come very close to meeting its target of 4,500 freight forwarders/ clearing agents trained, the so-called “critical mass” of trainees. Analysing the project administrative (monitoring) data should have allowed for clear assessment progress against certain intended outcomes. However, this has not been the case because of the incoherence and inconsistencies present in the project monitoring data.

FINDING 4: Evidence indicates that freight forwarders and clearing agents trained are acquiring new and/or improved knowledge and skills and applying this in their work.

- 10.11 A survey of EACFFPC graduates was conducted in which 100% of respondents said the training provided them with new and/or improved knowledge and skills. This evidence was mirrored in the feedback received during semi-structured interviews with EACFFPC graduates.
- 10.12 83% of respondents said that the training was ‘regularly useful’ in helping them to do their job better, indicating that the training proved to be highly useful and applicable for those graduates in their day to day operations. This evidence was broadly mirrored during semi-structured interviews with graduates.



10.13 In addition, nearly all respondents (some 98%) confirmed that they have shared their learning with colleagues, which would imply a sort of ‘multiplier effect’ on the benefits of training each individual graduate. This multiplier effect would need to be investigated further but this subsequent peer to peer knowledge sharing and learning is an interesting and potentially important outcome of the training project which was not originally envisaged.

FINDING 5: The policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms is being applied inconsistently across the region

10.14 After looking into the intended outcome of making EACFFPC training and certification compulsory for clearing and forwarding firms to be granted their operating licences, the evaluation found the obligatory certification requirement varies across particular countries of the EAC.

10.15 For example, in Rwanda the requirement is for clearing and forwarding firms to have at least two members of staff responsible for clearance of goods holding a diploma or certificate in customs training from a recognized institute, while in Tanzania the requirement is for firms to have two directors/employees who possess the East African Customs Clearing and Freight Forwarding Practising Certificate specifically. In Kenya, licencing officials at Kenya Revenue Authority informed us that only new licence applications are required to demonstrate that they have at least two employees with an accredited diploma or certificate in customs, but firms who are renewing their licence are not asked to demonstrate evidence of employees’ certification.

FINDING 6: The policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms is complex and difficult to implement

10.16 The fact that the firm is licenced but that individual employees are trained and certified creates a complex requirement for tracking the employment status of the certified individuals to ensure that firms are being licenced on the basis of current and genuine employment of certified individuals.

10.17 This policy also requires an arbitrary line to be drawn on the specific number of employees per firm who are expected to be certified in order for the firm to be licenced. At present this line is drawn at two employees per firm. In a five person firm, this would represent 40% of employees but in a 100 person firm it represents only 2% of employees. The relative cost burden of supporting staff to be trained and certified is higher for those smaller firms than for larger operators, creating an unequal bias in favour of larger companies.

10.18 Significant barriers to implementing this policy remain in some countries. For example, in Tanzania we were informed by TRA officials that it would be politically impossible for TRA to withdraw a company’s operating licence on the basis that they do not have two certified employees on the books.



FINDING 7: The policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms may, in some countries, prove to be a barrier to competition in the training market

10.19 Directly linking licencing to EACFFPC certification explicitly, as is the case in Tanzania, raises concerns relating to competition in the training market. At present only national revenue authorities in association with national freight forwarding associations are able to deliver accredited EACFFPC training. This appears to represent a significant barrier to entry in the training market for any company wishing to provide this EACFFPC training.

10.20 It does not appear that this policy was introduced following any thorough analysis of its possible effects and implications. It may be possible that it was, but no evidence of this has been seen. If no such analysis was undertaken then this represents a high risk approach which may have produced a number of these sorts of unforeseen effects.

FINDING 8: Little evidence has been found that the policy of obligatory training certification as a pre-requisite for licencing freight forwarders and clearing firms is driving demand for EACFFPC training, as was anticipated.

10.21 While a small number of EACFFPC graduates indicated that the obligatory certification for licencing was a factor in undertaking the training, the vast majority of graduates interviewed did not cite this and highlighted instead their desire to learn and improve their professional knowledge / skills. On this basis, it is difficult to whether the policy has helped to drive demand or not.

FINDING 9: No gender mainstreaming targets or indicators have been set or tracked throughout the project, although there has been a recognition that gender needed to be mainstreamed in the project.

10.22 While there has been a recognition that gender should be mainstreamed into the project, it is not clear that gender mainstreaming has actually occurred. No gender mainstreaming targets or indicators have been set or tracked throughout the project, although some monitoring data has been collected in a gender disaggregated fashion.

FINDING 10: Some evidence of unequal access for women to the EACFFPC training was found from the semi-structured interviews with graduates.

10.23 Some of the female and male graduates in Kenya and Tanzania felt that the location and/or the timing of the training proved a barrier to women's participation. The location of training, in particular at the KESRA and ITA training centres in Mombasa and Dar es Salaam, was cited as being too far from the main residential areas of the cities. This combined with the training (for those taking the course part-time) being in the evenings, meant that some women felt insecure in undertaking the journey to and from the training centres. The evening timing of the training was also cited as being particularly difficult for women relative to men due to women's domestic commitments at that time of day.



FINDING 11: Project design could have been more evidence-based to ensure relevance of the intervention

10.24 The project scoping documentation associated with TMEA’s intervention in the EACFFPC project contains a brief summary explaining why it is believed that increasing the standard of freight forwarding and clearing services in East Africa could help to increase the effectiveness and efficiency of the region’s logistics sector more broadly. However, this rationale is not supported by any evidence-based analysis of whether the standard of services provided by forwarding and clearing agents is a key determinant of an effective and efficient logistics sector.

FINDING 12: All project stakeholders interviewed believe that increasing the standard of services of clearing and forwarding agents in the region is likely to increase the efficiency and effectiveness of the logistics sector in East Africa.

10.25 All stakeholders (TMEA, FEAFPA, national freight forwarding associations, revenue authorities) and a significant proportion of beneficiaries (EACFFPC graduates) believe that increasing the standard of services of clearing and forwarding agents in the region is likely to increase the efficiency and effectiveness of the logistics sector in East Africa. The primary anticipated mechanism for this change was consistently cited as being centred around improved clearing and forwarding agents’ increasing compliance with customs declaration requirements, leading to reduced time taken and reduced costs in clearance of goods, and in turn a more effective and efficient logistics sector.

10.26 The semi-structured interviews with EACFFPC graduates, the results of the perception survey of graduates, and the stories of significant change collected during this evaluation all provide evidence that the forwarding and clearing agents themselves are experiencing improved standard in their service delivery as a result of the training, and that that higher standard of service is perceived to be contributing to reduced clearance times and associated costs to traders. Assessing the extent to which improvements in the logistics sector can be attributed to this enhanced standard for freight forwarding and clearing services would require a much more involved and resource intensive study than is possible in the context of this evaluation.

FINDING 13: Results of a survey of EACFFPC graduates indicates that the training was relevant to their professional development requirements

10.27 Survey results indicate that the training was relevant to the requirements of those respondents, with 100% of respondents saying the training provided them with new and/or improved knowledge and skills, over 80% saying the training as regularly useful to them in their jobs, and over 80% of respondents saying it has helped them to provide quicker and lower cost services to their clients.

FINDING 14: Currently, the emphasis of the curriculum and training materials, in relation to time allocation, is on customs to the detriment of important freight forwarding knowledge and skills



which are essential in relation to EAC traders realising export potential /competitiveness and controlling the cost of imports.

10.28 Generally, the customs elements of the curriculum, and the related training manuals, are more detailed and accurate than the other sections. The EACFFPC is, arguably, not sufficiently meeting the need in the region for increased knowledge, skill and proficiency in freight forwarding.

10.29 In its current format, EACFFPC is a good test of the proficiency of customs declarants in the clearing and freight forwarding professions but the freight forwarding section only provides 'awareness level' knowledge.

FINDING 15: There is little evidence of a sufficient focus on ongoing monitoring, evaluation and learning, with a view to feeding this information into project decision-making.

10.30 Ensuring relevance of the intervention to the objectives and requirements of stakeholders and investors and whether the activities and outputs are consistent with these objectives, is an important aspect of any development project. It requires a sound monitoring, evaluation and learning approach to be embedded in project management and reporting. There is little evidence that such an approach has been embedded in this project. The project reporting, for example, is largely focussed on summarising activities undertaken and not sufficiently results focussed (outcomes and impacts) and, as a consequence, does not support effective monitoring, evaluation and learning.

FINDING 16: There has been some success in terms of the sustainability of the project, although this picture of sustainability is varied across the region.

10.31 TMEA funding for the project ended in 2014, however, the EACFFPC training project is continuing to some extent without this funding. However, this picture of sustainability is varied across the region. In Kenya, KESRA (who deliver the majority of training in Kenya) have indicated that class intakes are now significantly lower than was the case in recent years. In Tanzania, TAFFA have strong concerns about sustainability in relation to the price of training having to increase to cover the costs of delivery and whether this will dampen enrolment rates. In Rwanda, the training appears to be continuing in much the same way as it was under TMEA funding.

FINDING 17: There have been benefits in terms of sustainability for individual institutions involved in the EACFFPC project.

10.32 The EACFFPC project has helped many of the implementing organisations to develop pillars of their own institutional sustainability. Examples of this include: the EACFFPC helping to significantly increase the level of awareness across the country / region of certain organisations; participation in the EACFFPC has helped to increase membership base of some national freight forwarding associations; and training the private sector has helped national revenue authority training centres to diversify their income base.



FINDING 18: A serious sustainability concern has been identified with regard to some of these institutions and their role in the EACFFPC training and certification network, namely FEAFFA and the some of the national training institutions

10.33 Despite its lead role in setting up and coordinating the EACFFPC, FEAFFA does not, as yet, generate revenue from any sustainable sources relating to the EACFFPC. FEAFFA's financial gains from EACFFPC have been solely linked to the grant funding from donors, most recently TMEA.

10.34 Similar financial sustainability concerns exist with the national freight forwarding associations, with the exception of ADR in Rwanda. In Rwanda, ADR's involvement in EACFFPC is on a much more sustainable footing because they generate all revenue from the EACFFPC, paying RRA fees for provision of customs trainers. In all other EAC countries, the training delivery and certification is led primarily by the training institutes affiliated with the national revenue authorities.

FINDING 19: There is an unhelpful tension around the future of 'ownership' or lead responsibility for delivering the EACFFPC among key stakeholders, which is something that will need to be proactively addressed in the coming months and years.

10.35 It is unusual for government agencies to be providing industry-leading professional training and certification to the private sector. In many other countries, it is the national freight forwarding associations who lead on the training and certification of their members. This tension around the future 'ownership' or lead responsibility for delivering the EACFFPC is something that will need to be proactively addressed in the coming months and years.

FINDING 20: The EACFFPC project results chain requires greater logical coherence and clarity

10.36 According to DCED guidelines, "the results chain is a visual tool to show what the programme is doing, and why. (It) clarify(s) the 'logic' of the programme, by showing how activities will lead to outputs, outcomes, and eventually development impact... ultimately results chains through a simple diagram helps programmes realistically illustrate why they are doing what they are doing; how their individual work would help in achieving development impact; and provide the basis for assessing if and to what extent changes are taking place"¹⁵. In this way, the project results chain is a critical foundation for sound design, implementation and evaluation of a project.

10.37 We undertook a review of the results chain during the inception phase of this evaluation, undertaken in collaboration with TMEA and FEAFFA, which concluded that the results chain required refinement to improve its logical coherence and clarity with a view to supporting coherence and clarity in this evaluation.

¹⁵ Kessler and Sen, 2013: "Guidelines to the DCED Standard for Results Measurement: Articulating the Results Chain".



FINDING 21: Project monitoring and reporting was largely activity focused in nature, lacking sufficient focus on project outcomes. Data management, both planning and execution, was inadequate throughout the project.

10.38 Project monitoring and reporting was largely activity focused in nature, lacking sufficient focus on project outcomes. Data management, both planning and execution, was poor throughout the project. When gathering existing project monitoring and administrative data during this evaluation, it was discovered that important data was not readily available at the beginning of this evaluation, or attainable by the end; data which would reasonably have been expected to be available.

FINDING 22: TMEA has helped to train an estimated 2,373 freight forwarders and clearing agents during the period of its funding. This equates to an average of 678 graduates per year under TMEA funding compared to 367 graduates per year before TMEA funding began.

10.39 This means that TMEA has helped train and certify approximately 59% of the estimated total number of graduates and the TMEA funding has helped to deliver an additional 311 EACFFPC graduates per year, compared to the annual number of graduates before TMEA funding began.

FINDING 23: Key project activities funded by TMEA were, overall, delivered in a timely manner.

10.40 The management and administration of the curriculum development process was highlighted by various stakeholders as being particularly efficient and effective.

FINDING 24: The EACFFPC project has had a relatively diffuse and complex training implementation network which has been effective in some ways but has also created inefficiencies and risks around sustainability

10.41 This committee based executive management of the training and certification has been effective to the extent that it has helped to ensure the buy-in and cooperation of the revenue authorities, their training institutes and the national freight forwarding associations. It has led to some delays, however, on important matters such as approving the release of payments to cover training operating costs or reviewing and releasing exam results to students.

FINDING 25: There does not appear to have been a suitable systematic management of risk in the project.

10.42 The range of project risks at activity, output, outcome and impact level do not appear to have been regularly identified and reviewed with appropriate risk mitigation approaches put in place. A small number of risks appear to have been occasionally identified in the reporting but overall risks have not been adequately identified, mitigated and monitored in a systematic and thorough manner.



Summary of lessons learned

LESSON 1: Project design efforts should ensure a results chain that is as logically coherent and clear as possible.

- 11.1 The logical coherence and clarity of the results chain is very important as it captures the process of change expected from the intervention and forms the skeleton of the project's monitoring and evaluation framework. As TMEA's own how to note on results chains describes, "Results chains are the core of the TMEA monitoring framework. They are visual tools that show what we are doing, and why we are doing it."¹⁶
- 11.2 When this skeleton or framework is not well formed it will struggle to support success in project delivery. Project designs should be 'signed off' for launch on, among other things, the strength of the results chain and associated monitoring framework. The results chain and associated monitoring framework then provide the basis for sound results based management of the project where monitoring, evaluation and learning are facilitated by the quality of the project logic and related baselines, indicators and targets. Finally, the benefits of a logically coherent and clear results chain feed through to the summative evaluation of a project, where the questions to which answers are sought during the evaluation are aligned closely with the questions being asked by the project team throughout delivery and subsequently to the data collected during project monitoring.

LESSON 2: Project scoping and design should be evidence-based wherever possible.

- 11.3 Striving, wherever possible, to design development interventions on an evidence based theory of change is important. It not only helps to justify and defend the underpinning logic of the intervention but it also provides an analytical foundation for framing expected outcomes and impact. It can also provide an analytical foundation or entry point for undertaking the monitoring and evaluation efforts aimed at tracking and assessing project success.

LESSON 3: Alternative project delivery mechanisms should be considered as a matter of course at project design stage to ensure interventions approaches are justified on factors such as relevance, sustainability, and VFM relative to other possible project approaches.

- 11.4 When considering the mechanisms for achieving the intended impact and outcomes of a project it is good practice to seriously consider, investigate and analyse the merits and challenges of more than one approach. This will provide the project team with the opportunity to rigorously identify and assess the strengths, weaknesses, risks and opportunities of the possible delivery mechanisms, including the preferred one.
- 11.5 For example, in attempting to realise the impact and outcomes of this project, there are alternative delivery mechanisms to the training and certification being delivered by national revenue authorities. These include the training and certification being delivered by private sector training companies, or by national freight forwarding associations. Critically thinking through the various options at design stage (and documenting this thinking) helps to test prevailing assumptions and cultivate a deeper understanding of the potential risks and

¹⁶ TMEA, 2013: "HOW TO MAKE RESULTS CHAINS", a TMEA results measurement how to note.



opportunities around the relevance, sustainability and efficiency of the respective options. Such an exercise then supports better monitoring, learning and evaluation throughout the project.

LESSON 4: Monitoring plans should be complete with baselines, indicators and targets that can be used to monitor anticipated results. The monitoring plan then needs to be updated on a regular basis throughout programme delivery.

11.6 The monitoring plan provides the vehicle for capturing ongoing results of the project and is therefore critical to effective results-based management. The updated and well-used monitoring plan also forms a critical piece of the evidence jigsaw for any evaluation of the project. Without a complete or regularly updated monitoring plan, determining the results of the project is extremely difficult, cost/effort intensive, and almost always sub-optimal.

LESSON 5: Project monitoring requires effective data collection and management underpinned by sound project monitoring planning (including sufficient budget for effective data collection and management).

11.7 Effective monitoring and evaluation requires effective data collection and management. The effort to achieve this should begin not at evaluation stage, nor during implementation stage, but during project design and inception stage. Having developed a results chain and monitoring plan it is essential to then develop a data collection and management plan. This should include, among other things, detail on what data is to be collected and why, by who, how and when it will be collected. It should include a specific budget of time and financial resource to undertake this data collection. Having developed this plan, the project team then needs to execute it throughout the lifetime of the project, being sure to update it based on learning that emerges during project delivery.

LESSON 6: Monitoring, evaluation and learning (MEL) should be embedded into ongoing project management to support improved project performance and risk management

11.8 While many of the structures of MEL appear to be in place for this project (e.g. progress reports, project team meetings, stakeholder engagement, etc.) these structures do not appear to have been effectively utilised for ongoing improvement of project management and the ongoing identification and (attempted) mitigation of risks to success. MEL needs to be embedded into projects as a fundamental aspect of project delivery that supports the team's ability to deliver rather than being viewed primarily as a vehicle for meeting reporting and accountability requirements.

LESSON 7: Project risks need to be systematically identified, mitigated and monitored throughout project delivery.

11.9 One important way to ensure a project has the greatest chance of success possible is to be systematic and proactive in the identification and management of risks to success. This is a key aspect of project monitoring and learning, with sound risk management directly informing how the project is delivered. There is little evidence that such a risk management approach has been utilised.



LESSON 8: Gender mainstreaming requires more than disaggregation of monitoring data by gender

11.10 There is a recognition that gender equality should be mainstreamed in this project, however this appears to have manifested itself largely in the disaggregation of some monitoring data by gender. Although some of the project actors (namely some of the training providers) did appear to adapt aspects of the project to attempt to address risks around inequality of access on the basis of gender (by offering alternative training locations to ensure training was equally accessible by men and women).

11.11 While these elements are important, it is also critical to rigorously and systematically assess the (expected and unexpected) implications from a gender perspective of planned, ongoing and completed project activities. This does not appear to have been done in this project.

LESSON 9: TMEA's support to national or regional policy changes, such as the one around licencing of forwarding and clearing firms in this project, should be on the basis of sound research around costs and benefits of the policy change

11.12 The regional policy change pursued in this project to make training and certification of freight forwarders and clearing agents a requirement for licencing of clearing and forwarding firms seems to have been pursued, with support from TMEA, without research and analysis into the implications, costs / benefits, sustainability, etc. of the policy change. As highlighted in the findings of this evaluation, there are issues and doubts regarding the practicality, suitability and implications of this policy change. In our view, TMEA should not support such policy changes without a clearly articulated rationale supported by sound and thorough analysis.

LESSON 10: Effective evaluation planning is crucial if TMEA is to get the most value from the evaluations of its project portfolio.

11.13 Getting the most from evaluations such as this one requires sound planning. This planning needs to include a well prepared terms of reference which contains a carefully calibrated set of main questions formulated both to align with the evaluation criteria and the practical parameters of the evaluation context. In this evaluation, time was required during inception phase to refine the set of questions in the terms of reference to ensure their clear alignment to the evaluation criteria and to the practical realities of the resources available (elapsed time and financial) in this evaluation.

11.14 Sound planning also requires setting aside sufficient elapsed time for data collection, analysis and write-up. This has not, arguably been the case in this evaluation.

11.15 Finally, sound planning requires the project team to have a complete and organised set of monitoring data ready for evaluation teams to review. Data surrounding this project was often incomplete or fragmented in nature and was shared with the evaluation team in a somewhat piecemeal fashion, often only upon request from the evaluation team. With a greater level of evaluation planning, some of these inefficiencies could have been avoided.



Summary of recommendations

RECOMMENDATION 1: If TMEA wishes to further investigate the impact of the EACFFPC training we recommend a detailed follow up study into whether there is a causal link between the number of customs declaration errors made by trained agents versus untrained agents and the extent to which this link translates into time / cost savings for traders.

12.1 By obtaining data from national revenue authorities that captures the time taken to clear cargoes declared by specific clearing agents and/or the number of declaration errors by specific clearing agents, alongside data showing which clearing and forwarding firms in the given country have staff trained and certified under the EACFFPC, it may be possible to establish a strong statistical correlation or even of a causal link between EACFFPC training and certification and reduced clearing time / cost for traders.

RECOMMENDATION 2: Any future TMEA support to the EACFFPC project should be contingent upon the results of a detailed and robust verification of trainee and graduate numbers in each country against stated results

12.2 The available project monitoring data for this evaluation on the numbers of men and women trained, their names and contact details, or when they were trained, appears to be often fragmented, absent or inconsistent. If TMEA was considering further funding to this EACFFPC project, we believe it would be prudent to undertake a verification exercise on the number of people trained to date. It should be possible to investigate, collate and analyse the data held by national training institutes and freight forwarding associations. Although this will require a fairly significant allocation of time and budget to complete this exercise.

RECOMMENDATION 3: Any next phase of TMEA support to the EACFFPC project should begin with a participatory definition of the project's theory of change from which a refined project results chain would be developed.

12.3 Creating a logically coherent and clear results chain and an effective monitoring plan can be achieved by undertaking a participatory process of theory of change definition. Working through the process of developing a theory of change (setting out and agreeing the anticipated pathway from activity to impact of a given intervention) will help to ensure critical analysis and clear articulation of the plausibility and logical coherence of the stages of the change process and the steps between those stages. If project personnel require support in undertaking this process, then TMEA should ensure this support is in place.

RECOMMENDATION 4: A detailed review of alternative delivery models for the EACFFPC training and certification should be undertaken. This should take account of the need to rebalance the training curriculum to ensure appropriate coverage of freight forwarding knowledge and skills (see recommendation 5), the serious tensions between some national freight forwarding associations and revenue authorities over leadership and ownership, as well as the challenges to sustainability.

12.4 Continuing to build the EACFFPC training and certification offer to the freight forwarding and clearing industry requires, in our view, as review of the existing delivery model for the training and certification alongside alternative delivery models. This review should critically analyse whether the existing delivery model can be improved.



RECOMMENDATION 5: The EACFFPC curriculum and training materials should be revised and developed to ensure appropriate balance in coverage between freight forwarding and customs subject matter.

12.5 As commented upon in our expert review of the EACFFPC curriculum and training material (see Annex D), the existing training focusses predominantly on customs at the expense of wider freight forwarding. This imbalance should be redressed to reflect the intention for the EACFFPC to raise the standard of freight forwarding services in the region, as well as clearing services.

RECOMMENDATION 6: A pragmatic review (perhaps a political economy analysis or cost-benefit analysis) of the policy change around obligatory certification for licensing of forwarding and clearing firms should be considered.

12.6 Whether this policy change is delivering against its intended purpose (which itself is not entirely clear) is up for debate based on the evidence of this evaluation. More important perhaps is the fact that the both the practicalities and political realities of embedding such a policy change in practice, as well as the possible unintended consequences of this policy change, seem to be largely unacknowledged or not understood. A review of this policy should be undertaken to better understand the impact, effectiveness and viability of continuing with the policy.

RECOMMENDATION 7: Project monitoring in future should be at the output to outcome level as well as the activity level

12.7 In addition to monitoring at the activity to output levels of the results chain it is important that TMEA's projects are monitored at the output to outcome level too. Taking the refined results chain for the EACFFPC project as an example, this would mean setting and tracking indicators not only for numbers of men and women trained but also for extent to which trainees are learning additional / new knowledge and whether that knowledge is being applied.

RECOMMENDATION 8: The EACFFPC project should introduce project feedback forms for trainees as an essential requirement and these forms should be captured electronically to support project monitoring, evaluation and learning.

12.8 While there was some evidence provided during semi-structured interviews with revenue authority training institutes that feedback from trainees / graduates was collected, this trainee feedback data did not flow up and into the project monitoring system. Collecting feedback from trainees on a training project such as this should be viewed as an essential monitoring data collection tool.

RECOMMENDATION 9: Any future support from TMEA to this project should be contingent on development and implementation of plans around more effective gender mainstreaming in the project

12.9 TMEA is committed to mainstreaming gender in the work it undertakes and funds. Gender was not effectively mainstreamed into the EACFFPC project. Any further support from TMEA should be contingent upon an assessment of potential barriers to access by gender and how these can be addressed, and the development of a monitoring plan which support learning and ongoing improvement around gender equality in the project.



RECOMMENDATION 10: A project risk register should be established for this project, identifying and tracking risks at all levels of the project.

12.10 Effective risk management is a crucial aspect of results-based management and one systematic way to identify, capture, and monitor risks in a project is a risk register (a summary of identified risks, the likelihood that the risk will affect the project, the possible impact of the risk on the project, the mitigation to be deployed, and who is responsible for managing each risk). This sort of tool can be a practical aid to support programme teams track and proactively manage risks.



Annex A: Further analysis conducted post-evaluation

1. Overview

The EACFFPC summative evaluation was completed on 8th May 2015 and the main body of this report constitutes the final evaluation report. However, following completion of the evaluation, TMEA requested LDP to analyse additional data produced by the EACFFPC project team (i.e. TMEA and FEAFFA). This additional data was shared with LDP on 22nd June 2015 and includes the following:

- A further developed (but still incomplete) dataset containing names and contact details of EACFFPC graduates across the five EAC countries;
- A briefing note summarising the recent work undertaken by FEAFFA to assemble this additional data on EACFFPC graduates and FEAFFA's views regarding data collection / management challenges present in the EACFFPC project;
- A summary of TMEA's financial spend for the EACFFPC project, broken down into various expenditure categories;

This annex summarises our findings from the analysis of this additional data, including:

- an updated summary of the evaluation's findings around the effectiveness of the project relating to the latest data regarding number of EACFFPC graduates;
- an update to the calculations around VFM in terms of TMEA's spend per EACFFPC graduate;
- a summary of the latest financial information available for TMEA's support to the EACFFPC project and a summary of the limited extent to which this allows for further VFM analysis;
- a note which explicitly addresses the issue of data gaps and the extent to which it is possible to weigh up the level of investment in the EACFFPC against the results achieved

2. Update on project effectiveness

The additional data provided on June 22nd 2015 included the most recent data on numbers of individuals trained under the EACFFPC. These updated statistics were gathered as a result of an initiative undertaken by the EACFFPC project team in June 2015 to capture and verify EACFFPC graduate data from the primary sources i.e. the EACFFPC training centres in all countries. As noted by FEAFFA, such an exercise was required because of a "lack of proper data for purposes of this evaluation"¹⁷.

As described in paragraph 6.13 of the final evaluation report, the most complete dataset that was available prior to FEAFFA's aforementioned data verification exercise indicated a total of 4,311 EACFFPC graduates (i.e. 4,063 graduates plus 248 people given an equivalent 'certificate of competence'), of which 3,183 were men and 1,128 were women. Having analysed the latest dataset shared by FEAFFA, we can confirm that this dataset indicates a slightly different total of 4,272 graduates (including individuals awarded a certificate of competence, otherwise referred to as

¹⁷ see: FEAFFA, 2015: "Brief on the EACFFPC data provided by FEAFFA"



“COCs”). In addition to the 4,272 graduates and COCs, it is important to note that the project also trained 154 EACFFPC trainers across the region.

The comparative analysis between data presented in the final evaluation report and the latest data shared by FEAFFA in June 2015 is shown in table i below.

Table i: Analysis of data on no. of EACFFPC graduates – updated dataset (June 2015) compared to data presented in the final evaluation report

Country	Data presented in final evaluation report		Latest data shared by FEAFFA in June 2015	Difference (+/-)
	no. of graduates (male)	no. of graduates (female)	No. of graduates	
Burundi	137	39	176	0
Kenya	1,375	375	1,735	-15
Rwanda	211	142	399	46
Tanzania	925	363	1,216	-72
Uganda	535	209	746	2
Gender	3,183	1,128	[Gender disaggregation not complete in June 2015 data]	n/a
Total	4,311		4,272	-39

Aside from confirming that the graduate numbers in the final evaluation report are close to those produced by FEAFFA’s latest data verification exercise, the latest dataset reinforces the evaluation’s conclusion that there are serious data collection and management issues in the EACFFPC project. While a significant effort has been made by FEAFFA to clarify the figures around number of EACFFPC graduates, the latest data set retains a number of major gaps, which include:

- incomplete gender disaggregated data on number of graduates per year per country;
- incomplete information on the number of men and women enrolled in each country per year; and
- incomplete information on the number of men and women who dropped out before graduation in each country per year.

3. Update on project efficiency

An element of the analysis in the final evaluation report relates to TMEA’s spend per EACFFPC graduate (see pages 59-60 of the final evaluation report). The additional information received in June 2015 includes a) latest data on number of EACFFPC graduates (as shown in table i above) and b) updated financial information on TMEA’s spend on the EACFFPC project. Taking these pieces of information together, it is possible to update the analysis around TMEA’s spend per EACFFPC graduate.

As shown in table i above, the latest estimate of total EACFFPC graduates in 4,272. If we take the estimation used in the final evaluation report that 59% of all EACFFPC graduates graduated during the



period of TMEA's funding¹⁸, we can estimate that TMEA's support to the project helped generate 2,520 graduates (note - the EACFFPC has been running since 2007 and TMEA began its support in 2011).

Meanwhile, the latest financial information from TMEA shows a total TMEA spend on the EACFFPC project of US\$2,044,146. On the basis of 2,520 graduates during the period of TMEA funding, we can estimate a TMEA spend of US\$811 per graduate. Adding the 154 trainers trained¹⁹ by the project to the total number of graduates makes 2,674 graduates and trainers, allowing us to estimate the TMEA spend per graduate and trainer trained as US\$764. The estimated TMEA spend per graduate in the final evaluation report is US\$869, so this US\$764 figure represents a 12% downward adjustment of this estimated spend per graduate metric. As noted, in the paragraph 9.6 of the final evaluation report, it is also important to note that TMEA's funding allowed for a significant increase in the number of EACFFPC graduates per year relative to the period before TMEA funding began.

We can conclude, therefore, that TMEA spend per graduate may be lower than previously estimated in the final evaluation report. Nevertheless, the main conclusion of the final evaluation report in relation to this analysis is that TMEA has heavily subsidised the *real* cost of the EACFFPC training, and this conclusion remains valid. The course fee paid by an individual trainee in Kenya is KES 60,000 and in Tanzania it is TZS 880,400, which equates to approximately US\$ 636 and US\$ 465 respectively (based on April 2015 exchange rates). Taken together with an estimated TMEA spend per graduate and trainer trained of US\$764, these figures suggest that TMEA has significantly subsidised the *real* cost of EACFFPC training and certification per EACFFPC graduate, which reinforces the concerns about both the VFM to TMEA and the sustainability of the EACFFPC project post-TMEA funding.

This view does, however, need to be considered in the context that TMEA's funding for the EACFFPC was targeted to a significant degree at investing in longer-term assets for the EACFFPC project (e.g. the curriculum, training materials, equipment, etc.) rather than subsidizing working capital (i.e. day-to-day running costs). TMEA estimate that around two thirds of spend was invested in these longer-term assets with the other third contributing to EACFFPC working capital. This means TMEA's funding will contribute to the training of forwarding and clearing agents in the months and probably years beyond the cessation of TMEA's funding of the project (to the extent that such training continues). This will lead to a reduction in the TMEA spend per graduate metric over time, which is positive from a VFM efficiency perspective.

Putting this spend per graduate metric aside, the central point made in the final evaluation report relating to project efficiency is that it is not possible to assess the extent to which TMEA's investment represents good VFM. This could have been possible if the project finances were organized and detailed on the basis of "inputs used to deliver each output". This would have allowed us to analyse VFM economy (i.e. are the inputs as low cost as possible while still meeting sufficient quality requirements?) and VFM efficiency (i.e. How well are inputs converted into outputs? Are the inputs used as efficiently as possible in producing the anticipated outputs?). Unfortunately, the latest data made available to LDP on June 22nd 2015 does not make it any more possible to adequately assess VFM.

¹⁸ Please note, this is the evaluation team's estimate as there is no clear record in the monitoring data regarding the number of EACFFPC trainees who graduated during the period of TMEA's funding.

¹⁹ From the available data, it appears all 154 EACFFPC trainers were trained during the period of TMEA's funding.



4. Update on project finances

An element of the updated project information shared with LDP on 22nd June 2015 was TMEA's latest financial data for the EACFFPC project. This updated data includes a revised figure for total project spend of US\$2,044,146. This is approximately US\$82,000 lower than the previous total spend figure referred to in the final evaluation report, which was US\$2,126,458.

In addition to this figure for total spend, the latest financial information also includes a breakdown of this spend across various sub-categories. Unfortunately, this categorisation is both unclear and lacking in sufficient accompanying explanation. It does not provide information on inputs used to deliver project outputs and outcomes and therefore offers no further opportunity to analyse and investigate VFM in either economy or efficiency terms.

It is also important to note that the latest financial information appears to indicate that a large proportion of the total project budget has been utilised for operational expenses (e.g. travel and subsistence costs). These expenses may be wholly justifiable but the lack of explanation and clarity around these figures raises more questions than answers from a VFM perspective.

The lack of clear and detailed financial information for the project raises concerns over VFM. LDP therefore recommends that TMEA undertakes a thorough investigation of the financial management of the EACFFPC project to address these concerns.

5. Note on data gaps and TMEA's return on investment in the EACFFPC project

TMEA's joint evaluation group (JEG) commented, as part of the review of the final evaluation report, that "it is important to provide distinct conclusions with regard to the level of investment vis-a-vis the results that were achieved... Was the investment worthwhile? Is this project worth replicating?"

Unfortunately, however, the questions of whether the EACFFPC project represents a worthwhile investment for TMEA and whether it is worth replicating cannot be answered definitively because of the difficulty in assessing VFM in the project.

It has not been possible to evaluate the extent to which the EACFFPC represents VFM to TMEA, because:

- no tracking of VFM economy savings was undertaken during the project, leaving the evaluation team with little available evidence to assess VFM economy;
- there remains a lack of clear and sufficiently detailed financial information to support an assessment of VFM efficiency, such as a breakdown of TMEA spend per project output / outcome;



- VFM from an effectiveness perspective (i.e. return on investment) cannot be estimated in quantitative terms due to a lack of data on the scale of time / cost savings enjoyed by traders as a result of the EACFFPC training.

Efforts were made by the evaluation team to gather the data required to support VFM assessment but it was not possible to do so. This was because either it was not adequately maintained by TMEA and FEAFFA (as in the case of financial information) or because project stakeholders have not been forthcoming in response to data requests (as in the case of data from revenue authorities which could have been used to measure the scale of time / cost savings enjoyed by traders as a result of the EACFFPC training).

As shown in the summary of results presented in paragraph 1.13 of the executive summary, the evaluation concludes that the project has performed well in impact, effectiveness and sustainability terms, and is deemed to be very relevant in terms of TMEA's corporate results framework and beneficiary needs. Unfortunately, because there is insufficient evidence on which to reliably assess VFM, the question of whether these positive results represents a sufficient return on investment will remain a matter of subjective judgement for TMEA and its investors.

The lack of clear and detailed financial information for the project raises concerns over VFM. As mentioned above, LDP therefore recommends that TMEA undertakes a thorough investigation of the financial management of the EACFFPC project to address these concerns. Following such an investigation it may be possible for TMEA to revisit the question of VFM with greater evidence in hand, which may in turn help to address the questions of whether TMEA's funding of the project was worthwhile and whether it should be replicated.



Annex B: EACFFPC summative evaluation plan

13.1 This annex contains the evaluation plan which was set out in the inception stage of this evaluation as a guide for the activities in this summative evaluation. The evaluation plan follows the five OECD-DAC evaluation criteria.

13.2 The evaluation plan outlines the following:

- The prioritised, main evaluation questions being asked;
- A subset of more specific questions, answers from which may help to inform answers to each main question;
- A set of indicators which capture how will we know the answers to the evaluation questions asked²⁰;
- A summary of the data collection methods to be used in attempting to answer the evaluation questions;
- A summary of who will be responsible for collecting or capturing the data; and
- An overview of when the data will be gathered.

²⁰ In developing our evaluation plan, the indicators we are using to answer the evaluation questions are not always the same as the indicators in the project monitoring plan. The reason for this is twofold: 1) we need to have indicators which align with the refined results chain and evaluation questions; and 2) a number of the indicators in the monitoring plan were not appropriately conceived and/or articulated in our view.



EACFFPC summative evaluation plan

Broad Evaluation Question	What do we want to know? (More specific question)	How will we know it? (Indicators)	Where will the data come from? (Data Collection Methodology)	Who will capture the data? (Responsibility)	When will the data be gathered?
IMPACT					
<p>(1) What was the intervention’s measurable impact on a more effective logistics sector? To what extent can identified changes be attributed to the intervention? What would have occurred without the intervention?</p>	<ul style="list-style-type: none"> - Was less time spent on clearing goods due the improved knowledge and skills of freight forwarders? - Did importers benefit from time and/or cost savings? - Did freight forwarders benefit from costs savings? - Did uncertified firms go out of business? - Has there been a positive or negative impact on competition in the freight forwarding market? - What was the impact on beneficiaries (freight forwarders/clearing agents, importers/exporters) and other stakeholders? What was the perceived impact on themselves? - What was the impact of the project (intended and unintended, positive and negative), especially on any sub-groups? 	<p>(1a) Indicators on cost and time and quality E.g. time taken to release cargo is lower for companies with trained staff than untrained staff, or # of modifications made on a lodged document and recorded on electronic system</p> <p>(1b) Evidence of +/- changes recorded by beneficiaries and other stakeholders</p>	<p>(1a) Econometric analysis of time release data and/or replication of previous difference-in-difference study of freight forwarders mistakes in Rwanda</p> <p>(1b) (MSC) Stories of Change</p>	<p>(1a) TMEA to request time release data from revenue authorities.</p> <p>(1b) LDP team to collect stories of change. TMEA and FEAFFA to select stories of most significant change.</p>	<p>(1a) February 23rd to March 6th 2015</p> <p>(1b) March 11th to March 18th 2015</p>
EFFECTIVENESS					
<p>(2) To what extent was the objective of a higher standard of services across the freight</p>	<ul style="list-style-type: none"> - Have traders, who have been serviced by graduates, noticed a difference in the quality of service? - Have customs officials noticed any 	<p>(2a) No. of rejected document submissions in</p>	<p>(2a) Administrative data from revenue authorities</p>	<p>(2a) TMEA to request administrative data from</p>	<p>(2a) February 23rd to March 6th 2015</p>

<p>forwarding industry in East Africa met?</p>	<p>difference in the quality of freight forwarding services since 2012?</p> <ul style="list-style-type: none"> - Have trained freight forwarders complied with laws, regulations, and processes? - Do freight forwarders complete processes quickly, with few mistakes? - Is there less corruption in clearance transactions? - Has corruption increased/decreased in the customs clearance process as a result of the project? 	<p>clearing process by trainees</p> <p>(2b) Evidence of improved service provided by freight forwarders</p>	<p>(2b) Semi-structured interviews with freight forwarders (trainees), importers/exporters and revenue authorities</p>	<p>revenue authorities</p> <p>(2b) LDP team to conduct interviews with freight forwarders (trainees), importers/exporters and revenue authorities, with organisational and logistical support from TMEA and FEAFFA.</p>	<p>(2b) March 11th to March 18th 2015</p>
<p>(3) How far were the intended outcomes and outputs achieved?</p>	<ul style="list-style-type: none"> - Have freight forwarders applied learning from EACFFPC? - Have trained freight forwarders increased the knowledge and skills? - Has there been an increase in levels of demand for EACFFPC training during 2012-2014 period? - Did an increasing number of freight forwarders take the course over time? Why? Due to pressure of mandatory certification? - Has the marketing been sufficient to raise awareness of the certification requirement and training offer? - Is the training of sufficient quality? - What is the perception of trainees on the utility and quality of training? - What number of freight forwarders (men and women) have been trained? 	<p>(3a) Evidence of the relevance of training to daily work</p> <p>(3b) no. of men/women passing the course</p> <p>(3c) participants' perception of increase in knowledge</p> <p>(3d) Graduates' level of familiarity with different modules.</p> <p>(3e) Rate of enrolment over time</p> <p>(3f) Evidence of awareness of EACFFPC across sector</p>	<p>(3a), (3c) Self-perception survey of trainees</p> <p>(3b), (3e), (3h), (3i), (3j), (3k) Administrative data from FEAFFA/Regional Coordinator/National Training Centres</p> <p>(3d), (3i) Semi-structured interviews with freight forwarders (trainees) / revenue authorities / traders</p> <p>(3f), (3j) Secret Shopper exercise</p>	<p>(3a), (3c) LDP team to design and distribute survey. TMEA / FEAFFA to provide contact details for trainees.</p> <p>(3b), (3e), (3h), (3i), (3j), (3k) TMEA to request administrative data</p> <p>(3d), (3i) TMEA to set-up interviews. LDP</p>	<p>(3a), (3c) February 23rd to March 6th 2015</p> <p>(3b), (3e), (3h), (3i), (3j), (3k) February 23rd to March 6th 2015</p> <p>(3d), (3i) Interviews to be arranged by March 6th 2015. To be conducted during period of March 11th to March 18th 2015</p>

	<p>- What evidence is there of a “critical mass” of freight forwarders having been trained? - Is the EACFFPC (or defined equivalent) a requirement for revenue authorities granting clearing and freight forwarding licenses</p>	<p>(3g) Evidence of training meeting international standard (3h) Drop-out rates of male and female trainees (3i) no. of men and women trained (less drop-outs) (3j) no. of individual’s trained per freight forwarding company in the East Africa (3k) no. of licences revoked for lack of EACFFPC or equivalent (3l) no. of revenue authorities adopting and implementing new policy in practice</p>	<p>(3g) Expert analysis of curriculum</p>	<p>team to conduct interviews. (3f), (3j) LDP team to prepare for and undertake secret shopper exercise (3g) LDP team to undertake expert analysis of curriculum and materials. TMEA to share curriculum and materials.</p>	<p>(3f, 3j) to be completed by March 31st 2015 (3g) to be completed by March 31st 2015</p>
<p>(4) If gender mainstreaming targets were set at project inception, to what extent were targets achieved, and what were the successes and challenges?</p>	<p>- Was the training equally accessible to men and women?</p>	<p>(4a) % of women trained relative to % of women in freight forwarding profession in East Africa (4b) evidence of (un)equal access to training opportunity</p>	<p>(4a) Administrative data from FEAFFA/Regional Coordinator/National Training Centres and existing market analysis data on number of freight forwarders in the region (disaggregated by gender)</p>	<p>(4a) TMEA / FEAFFA to share existing available data (4b) TMEA to set up interviews. LDP team to conduct interviews.</p>	<p>(4a) February 23rd to March 6th 2015 (4b) Interviews to be arranged by March 6th 2015. To be conducted during period of</p>



			<p>(4b) Semi-structured interviews with trainees/graduates</p> <p>(4b) (MSC) stories of change</p>	<p>(4b) LDP team to collect stories of change. TMEA and FEAFFA to select stories of most significant change.</p>	<p>March 11th to March 18th 2015</p> <p>(4b) March 11th to March 18th 2015</p>
RELEVANCE					
<p>(5) Does this project address the main challenges in the effectiveness of the logistics sector in East Africa?</p>	<ul style="list-style-type: none"> - Does the project conform to the needs of the importers / exporters, logistics industry, freight forwarders? - Is the intervention well in tune with the context of EAC trading systems and norms? Particular national laws & regulations? - Is it consistent with TMEA priorities, programmes and procedures? With those of other donors? - Are the activities, outputs, outcomes consistent with the objective and intended impact? - Was an MEL system in place, integrated in the project cycle and used to make project management decisions? 	<p>(5a) Evidence that EACFFPC conformed to needs of importers / exporters and freight forwarders</p> <p>(5b) Beneficiaries' perception of EACFFPC impact on overcoming problem of logistics sector inefficiency and ineffectiveness (freight forwarders (trainees) and importers exporters)</p>	<p>(5a), (5b) Semi-structured interviews with importers / exporters and freight forwarders (trainees).</p> <p>(5a) (MSC) stories of change</p>	<p>(5a) (5b) TMEA to set up interviews. LDP team to conduct interviews.</p> <p>(5a) LDP team to collect stories of change. TMEA and FEAFFA to select stories of most significant change.</p>	<p>(5a), (5b) Interviews to be arranged by March 6th 2015. To be conducted during period of March 11th to March 18th 2015</p> <p>(5a) March 11th to March 18th 2015</p>
SUSTAINABILITY					
<p>(6) What benefits (institutional, technical, financial, economic, gender equality) are likely to continue beyond the life of the project, even without TMEA?</p>	<ul style="list-style-type: none"> - Is the intervention consistent with partners' priorities and effective demand? Is it supported by local institutions and well integrated with local social and cultural conditions? - Do partners have the financial capacity to maintain the benefits from the intervention when donor support 	<p>(6a) & (7a) Evidence of increased organisational capacity and capacity to sustain any gains</p> <p>(6b) & (7b) Evidence of consistency of project to</p>	<p>(6a), (6b), (6c) & (7a), (7b), (7c) Semi-structured interviews with stakeholders</p> <p>(6a), (6b), (6c) & (7a), (7b) Survey among</p>	<p>(6a), (6b), (6c) & (7a), (7b), (7c) TMEA to set up interviews. LDP team to conduct interviews.</p>	<p>(6a), (6b), (6c) & (7a), (7b), (7c) Interviews to be arranged by March 6th 2015. To be conducted during period of</p>



<p>(7) What are the lessons learned relating to sustainability?</p>	<p>has been withdrawn?</p> <ul style="list-style-type: none"> - Is the intervention compatible with a sustainable use of natural resources? Or is it harmful to the natural environment? - What is the impact of the intervention on the capacity of FEAFFA? - To what extent does the intervention contribute to capacity development and the strengthening of involved institutions (e.g. national associations, training institute and revenue authorities)? - To what extent has the project has supported/hindered national associations and training institutes in exercise of their mandate? Can the additional resources be sustained? - To what extent are institutional arrangements for EACFFPC delivery sustainable? - What were the factors that influenced the achievement of project outcomes and objectives? - Do proposed innovations have potential for replication? - Are there any barriers or constraints that limit the application of the new skills acquired from the course? 	<p>implementing partners' priorities</p> <p>(6c) & (7c) Evidence of (in)efficient use of natural resource</p>	<p>national associations and training institutes</p>	<p>(6a), (6b), (6c) & (7a), (7b) LDP team to design and distribute survey. TMEA / FEAFFA to provide contact details for associations and training institutes.</p>	<p>March 11th to March 18th 2015</p> <p>(6a), (6b), (6c) & (7a), (7b) February 23rd to March 6th 2015</p>
<p>EFFICIENCY</p>					



<p>(8) To what extent and how has the intervention been effective and achieved good Value for Money (VfM)?</p>	<ul style="list-style-type: none"> - Has the evaluated intervention been managed with reasonable regard for efficiency (time, staff, money)? - What measures were taken to ensure efficient use of resources? - Were activities cost efficient? Outputs and outcomes achieved on time? - Could it have been implemented with fewer resources without reducing the quality and quantity of the results (compare alternatives)? Or more of the same result being produced with the same resources? Or the resources put to better use for another, more worthwhile purpose? - To what extent was risk management integrated in the programme? How often were risks identified, analysed and incorporated in programme design? - How efficient and effective were the management and administration systems and procedures including communication, programme results framework and reporting? 	<p>(8a) Evidence of VFM economy savings / overspend throughout project lifetime</p> <p>(8b) EACFFPC spend per graduate trained over time</p> <p>(8c) Total project costs compared with evidence of increased standard of freight forwarding services in the region</p>	<p>(8a) & (8b) desk review of project reports</p> <p>(8c) Semi-structured interviews with freight forwarders, importers / exporters and revenue authorities</p>	<p>(8a) & (8b) TMEA / FEAFFA to provide administrative data.</p> <p>(8c) TMEA to set up interviews. LDP team to conduct interviews.</p>	<p>(8a) & (8b) February 23rd to March 6th 2015</p> <p>(8c) Interviews to be arranged by March 6th 2015. To be conducted during period of March 11th to March 18th 2015</p>
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Annex C: Summary of project administrative data reviewed

Review of administrative data					
No	Title	Author	Period covered	Data presented in project files	Data inconsistencies / omissions
1	EACFFPC training programme, annual Project Performance Report	TMEA	Jul 2013 – Jun 2014	<p>Targeted critical mass of 4500 agents trained was achieved, inclusive of certificates of competence for 235 agents.</p> <p>Between July and September 2013 more than 3000 agents have been trained and will be awarded practicing certificates.</p> <p>516 agents graduated in Tanzania, Uganda and Burundi between January and March. Another 202 agents graduated in Rwanda between Apr – Jun 2014.</p>	<p>The numbers are not consistent with those in other project related documents (see: 2, 3, 4, 8, 11 below).</p> <p>There is no disaggregation of data by gender. No disaggregation of data by country. No summary of numbers of men and women that passed / failed or dropped out.</p>
2	EACFFPC Data Summary Sept 2014 (Annex 1 extracted from FEAFFA End of Project Report for EACFFPC)	FEAFFA	2007 - 2014	<p>A table that aggregates the total number of graduates from 2007 – 2014, disaggregated by country and gender.</p> <p>The total number is 4311 of which 3183 were men and 1128 were women.</p>	
3	EACFFPC Output Trend from 2007 – September 2014	FEAFFA	2007 – Sept 2014	A table that breaks down the number of graduates in each year by country and gender.	



Review of administrative data					
No	Title	Author	Period covered	Data presented in project files	Data inconsistencies / omissions
	(Annex 2 extracted from FEAFFA End of Project Report for EACFFPC)			Also specifies the number of people who received the certificate of competence (COC) and number of trainers trained under the project.	
4	FEAFFA EACFFPC Quarterly Progress Report Q1 2014	FEAFFA	January – March 2014	<p>A report that tracks project progress for this period.</p> <p>Targeted student enrolment is 600 students. 256 new students have joined EACFFPC classes in the year 2014. They include 114 in Kenya, 54 in Rwanda and 88 in Tanzania.</p> <p>Three graduations took place during this quarter. Tanzania graduated 283, Uganda 192 and Burundi 41.</p> <p>The report acknowledges challenges with training data in Kenya and Tanzania, documents appeared to have been lost and required a special review.</p>	The numbers above do not match those presented in documents no. 1 and 3, or the numbers are simply not present. None of the numbers provided are disaggregated by gender.
5	FEAFFA End of Project Report for EACFFPC	FEAFFA	May 2011 – June 2014	<p>Final narrative report for EACFFPC.</p> <p>Out of a target 2900 graduate certificates and CoCs, 2,333 have been issued. 2098 under the EACFFPC and 235 through the CoC. Results for 450 students were yet to be released in Kenya.</p>	<p>As above these numbers do not correspond with the table in document no. 3, which has a higher total despite lacking data from 2014.</p> <p>Numbers are not disaggregated by gender.</p>



Review of administrative data					
No	Title	Author	Period covered	Data presented in project files	Data inconsistencies / omissions
6	FEAFFA Monitoring Training Data Report 18092013	FEAFFA	2007 - 2013	This is a table that breaks down the number of participants registered, no. of drop-outs, no. that passed exams and no. that failed exams. Disaggregated by gender and country.	The numbers provided do not match documents no. 3 or 11 which are more recent.
7	Output monitoring data for all countries at end of Oct 2013	TMEA	2007 - 2013	A table that contains trainee data, covering enrolment as well as drop-out and pass rates.	Some information does not correspond with data from more recent documents supplied by FEAFFA such as document no. 11.
8	EACFFPC training programme Project Monitoring Plan	TMEA	12/11 – 12/14	The monitoring plan is claimed to cover the implementation period of the programme under TMEA funding only.	<p>Relative to other data (see document no. 2, 3, 6, or 11) the total number of graduates cited (4,330) is actually higher than the total cited elsewhere covering the entire period of 2007 - 2014.</p> <p>It is not clear where the baseline data and actual numbers are taken from as they do not correspond with any other documents provided.</p> <p>The numbers are not disaggregated by country or gender.</p>
9	TMEA EACFFPC	TMEA	2012 - 2013	A monitoring document containing data on baselines and targets for the number of people completing the course as well as pass and drop-out rates.	Actual achievements have however not been filled in.



Review of administrative data					
No	Title	Author	Period covered	Data presented in project files	Data inconsistencies / omissions
10	Folder - graduates	FEAFFA	Not clear	10 documents containing lists of participants from all countries.	<p>Apart from Tanzania most of the documents are not clearly dated.</p> <p>None of the documents disaggregate participants by gender.</p> <p>There is also no mention of course completion or whether participants passed the final exam. For many listed graduates there are only names, with no contact details.</p>
11	Country no of trained and dropout	FEAFFA?	2007 - 2014	A relatively comprehensive document of student data covering enrolment, drop-out and pass rates up until 2014, disaggregated by gender and country.	<p>There are still gaps in the data.</p> <p>The numbers provided do not fully correspond with other documents (1, 2, 3, 6, 7, 8), are either higher or lower, or gender disaggregation does not correspond with information provided elsewhere.</p>
12	EACFFPC output data Sept 2014 (extracted from FEAFFA End of Project Report for EACFFPC)	FEAFFA	2007 - 2014	Same information as in documents no. 2 and 3	



Annex D: Expert analysis of EACFFPC curriculum and training material

1. THE CURRICULUM

Overview

It is understood that the curriculum was designed with assistance from FIATA (international governing body for freight forwarders associations) and the various national Revenue Authorities. The stated course objectives are:

To equip trainees with necessary skills, competencies and values desirable in Customs and Freight Forwarding in order to:

- *Enable them to discharge their roles competently as Customs Agents*
- *Entrench professionalism in the services offered by freight forwarders, especially in customs clearing*
- *Enhance ethical conduct, good governance and integrity in the profession*
- *Facilitate trade*

The course is divided into 3 modules:

- Customs, designed to equip trainees with knowledge and skills to enable them to discharge their role competently as customs agents. It covers customs procedures, tariff classifications, valuations, rules of origin and application of ICT.
- Freight forwarding, introduces trainees to the profession covering the basics of freight forwarding
- Management, covers aspects of communications, planning, time management, ethics and integrity as essentials in sound business management.

The course can be undertaken as part time evening classes over six months (24 weeks) or full time over four months (16 weeks).

The customs module accounts for around 70% of the syllabus with freight forwarding and management accounting for the remaining 30%.

General assessment

The syllabus is clearly designed with a bias (70%) towards the customs clearance process for imports. This could be considered disproportionate. Freight forwarders and clearing agents provide declaration / clearance services on a second line basis. The principal customs disciplines of Classification / Valuation / Rules of Origin are pivotal in relation to customs officers' knowledge and skills whilst freight forwarders and clearing agents need awareness level knowledge of these subjects, rather than in depth. Conversely, freight forwarding skills are a first line service for forwarders and agents and, as such, would generally attract more than 30% of the syllabus. The drivers for the emphasis on customs issues can be summarised as:

- The desire to reduce clearance times in the EAC region



- The desire to reduce clearance costs in the EAC region. This is consequential costs such as vehicle detention charges, container rental fees, quay rent and demurrage.
- The need to improve the relationship between Customs authorities and clearing agents / freight forwarders and encourage mutual trust and respect.
- The need to reduce corruption opportunities.

These are important intentions but it is questionable whether an awareness level of knowledge of customs processes and procedures should require 70% of the syllabus. The result is that important freight forwarding / clearing agents fundamentals, such as Incoterms and handling Hazardous / Dangerous goods, do not attract the level of attention normally required. As the syllabus is currently configured, it is more appropriate for clearing agents than for freight forwarders (it is recognised that in the EAC, as an import dependant region, most clearing agents do provide forwarding services and most forwarding agents provide clearing services).

Syllabus content

Paragraph numbers, below, refer to the EACFFPC Curriculum, July 2012 Version

2.3 – 2.7 Background – It is unfortunate that reference is made to an outdated Incoterm, C&F, which ceased to exist more than 20 years ago. Although this is a point of detail, and such terminology is commonly used in the region, it is important to get such details right in reference to a professional qualification.

5.1 Customs - This is the largest section of the syllabus and covers EAC rules and processes together with national requirements where appropriate (for example declarations into national revenue customs management systems, such as SIMBA (Kenya) or ASYCUDA. The overall content is appropriate in relation to the subject matter covered for imports and exports. However, the time allocations could be reviewed for sub-sections. For example, 'classification', according to the HS commodity classification system, is very important in the clearance process. Clearing agents are expected to be able to correctly classify products for entry into national customs management systems. If the classification is not correct, incorrect duties may be applied and trade statistics could be skewed. Thus 40 hours on this section would be considered an appropriate allocation. Conversely, it is unlikely that the 'valuations' section requires 25 hours. Participants need to be aware of the WTO rules for valuation and how to calculate / establish the transactional value at CIF / CIP level from documents provided by the trader. This training need could be fulfilled within around 10 hours. The 30 hours allocation for Automated Customs Systems probably exceeds the current requirement but would, in the future, need to be jointly allocated to include national Single Window systems, such as Kentrade. In such cases, 30 hours would be appropriate.

5.2 Freight Forwarding – This has a total allocation of 80 hours, divided between Port Clearance and Freight Forwarding Operations. The Port Clearance section (5.2.1) has a total allocation of 30 hours and may sit better within 5.1 as cargo release is an extension of the customs clearance operation. This section is critical as, in addition to creating an understanding of port operations and the release process, it also give a good grounding in the activities of core stakeholders such as carriers, bureaux of standards, stevedores, ship's agents, hauliers, PSI / DI agents, security agencies and others. This section of the syllabus does not give as much content detail as the Customs section and this should be addressed. The Freight Forwarding Operations section (5.2.2) has a total allocation of 50 hours. Although some sections have appropriate time allocations, others are insufficient.

The following sections require expansion to be meaningful:



5.2.2.4 – Understanding movement, origin, insurance and commercial documents is a key element of the freight forwarders offering. Some documents, and the law relating to them, are complex – for example, Negotiable Maritime Bills of Lading. The conditions of carriage relating to the various transport documents (such as the Hamburg Rules, Rotterdam Rules, Warsaw Convention etc) are not included in this section, although mentioned in the training materials, which is a significant omission. 8 hours is not adequate to cover this training need, particularly as a short module on the inception of electronic document equivalents should also be added (as the use of electronic waybills / releases is increasing).

5.2.2.6 – Freight rate negotiation and computation, by transport mode, is core to the freight forwarders service, this section should be expanded.

5.2.2.10 – This section covers the Basis of International Trade and Transport and is, again, pivotal. The allocation of 4 hours does not even allow for an effective overview. Within this section Incoterms and Letters of Credit / International Payments are covered. These, alone, require at least 5 hours each.

5.3 Basic Management Skills – 30 hours is allocated to this module which could be condensed, or even removed to allow for more core technical content. It is arguable whether this should be part of the qualification or should be removed and left for freight forwarding companies to deliver to their staff, covering internal HR policies and staff rules and procedures. Section 5.3.5, covering Ethics and Integrity should be retained in the syllabus. This section includes the FEAFFA Code of Conduct and is important in relation to identification and eradication of corrupt practices.

Omissions, which should be specifically mentioned in the curriculum (even though some are included in the training materials) include:

- Cargo insurance, claims, institute cargo clauses
- Hazardous / Dangerous goods regulations (IMDG, IATA / ICAO, ADR), requirements, packing and documentation.
- Packaging / marking
- Cargo handling
- Supply Chain Security and AEO.

Overall, the Customs module of the curriculum contains significantly more content detail than the other sections. The balance needs to be addressed to ensure that core elements / processes / topics (such as those listed above) are included by name in the document.

2. TRAINING MATERIALS

All these materials (below) need to be re-constituted to provide topic by topic lesson plans for trainers. This is the only way to ensure consistency in training content delivery over the Member States. Each topic, as identified in the curriculum, should be allocated a detailed delivery plan, including:

- Preamble / context / beginning of lesson
- Main content headings, including references
- Case studies / examples (these should be standard but contextualised for partner states)
- Summary, questions, end of lesson.
- Standard Powerpoint to be used (contextualised)
- Standard handouts to be used (contextualised)



The training module documents should not be used as the training medium (one respondent mentioned the trainer simply read the book to the students) but should be an aide-memoire for the content headings and delivery mechanism for each lesson within the syllabus. There is a requirement for consistency, and cross-referencing, between the manuals. Standard formats / templates should be encouraged for handouts and PPTs. It is understood that NCICs prepare the training materials, PPTs and notes, a more centralised and consistent approach may be beneficial.

Customs Modules

The 3 manuals covering the Customs module provide significant detail, particularly the 'Classification' volume. They appear to have been written by different authors. The Valuation and Tariff Section is particularly well written and seems to be up to date with full integrity of content.

Freight Forwarding Module

This requires review and, to a large extent, re-writing. Significant elements of the content are incorrect and / or out of date (for example references to letter of credit rules and Incoterms explanations) and several time allocations are inappropriate (for example, 18 hours totally inadequate for dangerous goods by all modes, even if only awareness level). This is probably the least robust manual. The important knowledge areas of Cargo insurance and Supply Chain Security / AEO do not appear to be covered in the manual.

Management / Ethics / Integrity

These manuals appear adequate, well written and illustrated.

ICT

These manuals are specific to the operating system (SIMBA / ASYCUDA) and provide step by step guides to inputting declarations. They need frequent review as such systems are updated, for example, when SIMBA 2 comes on line.

3. TRAINERS

The basic requirements for trainers are:

- In depth and up to date subject knowledge
- Ability to assess differing training needs
- Ability to communicate
- Ability to promote the desire to learn
- Patience

Discussions with respondents suggested that not all trainers involved in curriculum delivery displayed these attributes. It is likely that the customs modules were more professionally delivered than the others. This is not surprising – Revenue Authorities are experienced in providing professional and vocational structured training for their officers. The Freight Forwarding and Clearing Agents industries in East Africa do not have similar experience, training was traditionally ad hoc and take up was limited.



Delivering training at evening classes is never easy and tests the trainer's skills to the full. Participants (and trainers) are likely to be tired after a full days' work and may not be receptive even when they feel they are motivated. This is exacerbated by the requirement for participants to attend every evening during the course period. One trainer (a member of KIFWA Mombasa staff) was interviewed and some of his training materials viewed.

Overall, the success of EACFFPC depends on the trainers abilities. These should be reviewed to ensure that the contracted trainers meet the requirements above. 'Instructional Skills' training courses should be held for new and existing trainers. These courses even benefit experienced trainers and should be regularly programmed. Secondly, up to date knowledge levels of the trainers must be assessed and assistance provided to upskill those who may need remedial tuition. International trade, shipping, forwarding and clearing are fast moving disciplines and it is essential that participants receive up to date knowledge.

4. CONCLUSIONS

Freight Forwarders and Clearing Agents are core to overall trade facilitation imperatives and activities. The EACFFPC initiative is a welcome step in the right direction. Participants appear to have gained significantly from the training, frequent comments were:

- We have a better relation with Customs
- Customers benefit as we provide knowledgeable advice and accurate information
- There are less disputes (importers vs customs)
- Our business has increased
- I am confident to confront customs officers
- We understand our rights (with customs)
- Correct taxes are collected
- Quicker clearances

These are all significant in their own right and, it is likely (although currently un-evidenced), that clearance times have, in some cases, reduced. However, samples were small and evidence to substantiate claims is limited. Conversely, most countries do enjoy tangible economic / trade benefits where cross border trade professionals are trained and enabled.

However, there needs to be a clearer focus. Should the certification be limited to Customs skills with a standalone professional programme in freight forwarding and management? Currently, the emphasis, in relation to time allocation, is on customs, this is understandable as it is understood that Customs Authorities initially drove the EACFFPC initiative as they perceived a need to upskill freight / clearance professionals. However, this is to the detriment of important freight forwarding knowledge and skills which are essential in relation to EAC traders realising export potential /competitiveness and controlling the cost of imports. Generally, the Customs elements of the curriculum, and the related training manuals, are more detailed and accurate than the other sections. In its current format EACFFPC is probably under-achieving, there would be great benefit in investment in, and attention to, the following areas:

- Full technical assessment and revision of the curriculum
- Full technical assessment and revision of the freight forwarding module
- Consideration of the overall need for the 'management' module
- Assessment and training / retraining of trainers in delivery skills and subject knowledge
- Review of delivery format / timings (2 hours every weekday night for 6 months is not the optimum way to impart skills)



- Design and production of standard training aids / materials / handouts.
- Translation of materials into French
- Consider delivery of elements of training on an on-line / remote basis.

An important enhancement could be to tie in EACFFPC with Authorised Economic Operator status for freight forwarders and clearing agents.

In its current format, EACFFPC is a good test of the proficiency of customs declarants in the Clearing and Freight Forwarding professions but the freight forwarding section only provides 'awareness level' knowledge. It should be clear the course does not 'qualify' participants in core technical areas such as handling hazardous goods (for which internationally recognised training and qualification is required), Incoterms nor export payments (such as providing advice on letters of credit and generation of compliant documentation).



Annex E: Overview of prepared semi-structured interview questions

Respondent Category	Planned questions
Category A: <i>EACFFPC trainees / graduates</i>	1. Why did you undertake the EACFFPC training?
	2. What do you feel you have gained from EACFFPC training and certification?
	3. What do you feel your clients have gained from your training and certification?
	4. What benefits, if any, do you think border agencies have gained as a result of this EACFFPC training and certification programme?
	5. In what ways do you feel this training has increased your professional knowledge?
	6. In what ways has the training been directly applicable in your work?
	7. What could be improved, if anything, to make the training more accessible to all freight forwarders and clearing agents, men and women?
	8. In what ways could the training have been more relevant to the realities of freight forwarding / clearing practice in East Africa?
	9. To what extent do you feel this EACFFPC training project has, or can in future, help to overcome the major challenges in the trade logistics sector in the region?
Category B: <i>Importers / exporters</i>	1. What are the main challenges and issues you experience with the service of freight forwarders / clearing agents?
	2. Are you aware of the EACFFPC? If so, how beneficial do you feel increases in the standard of freight forwarding and clearing services will be in addressing the main issues / challenges in the logistics sector in East Africa?
	3. What improvements, if any, have you seen in the services of freight forwarders / clearing agents over the last few years?
	4. What benefits have you enjoyed, if any, as a result of improved freight forwarding or clearing services?
Category C(i): <i>Revenue authorities (licencing officials)</i>	1. What impact do you think the obligatory training certification for licencing of freight forwarders or clearing agents has had / will have on the logistics sector and the actors within the sector?
	2. To what extent is the obligatory certification for licencing operational?
	3. How does / would the obligatory certification for licencing work in practice?
Category C(ii): <i>Revenue authorities (customs clearance officials)</i>	1. What are the main challenges and issues you experience with freight forwarders / clearing agents?
	2. What improvements, if any, have you seen in the performance or standard of freight forwarders / clearing agents over the last few years?



Respondent Category	Planned questions
	<ol style="list-style-type: none"> 3. What do you think are the key barriers to reduced customs clearance times in the region? 4. To what extent do you think training of freight forwarders and clearing agents can help to improve the effectiveness of the logistics sector in the region?
Category C(iii): Revenue authorities (training institutes)	<ol style="list-style-type: none"> 1. What has been the level of demand for this training over time? 2. What impact, positive or negative, has the EACFFPC training course had on the training institute? 3. How important has this EACFFPC training programme been for the training institute? 4. What challenges, if any, has the training institute had in making the training accessible to all freight forwarders and clearing agents, including men and women? 5. What has been the level of enrolment, non-attendance and drop out over time? 6. What efficiencies or inefficiencies have you observed in how the EACFFPC project has been developed and rolled out over time? 7. To what extent does the training institute intend to continue providing EACFFPC training in the future?
Category D: National freight forwarder associations	<ol style="list-style-type: none"> 1. What has been your impression of the impact of the EACFFPC on your members and their clients? 2. How beneficial do you feel increases in the standard of freight forwarding and clearing services will be in addressing the main issues / challenges in the logistics sector in East Africa? 3. What impact do you think the obligatory training certification for licensing of freight forwarders or clearing agents has had / will have on the logistics sector and the actors within the sector? 4. What impact, positive or negative, has the EACFFPC training course had on the association? 5. How important has this EACFFPC training programme been for the association and its members? 6. What efficiencies or inefficiencies have you observed in how the EACFFPC project has been developed and rolled out over time? 7. To what extent do you feel any benefits for the association are sustainable? 8. What role do you think the association will play in EACFFPC training and certification in the years to come?
Category E: Regional and national training coordinators	<ol style="list-style-type: none"> 1. What has been the level of demand for this training over time? 2. What efficiencies or inefficiencies have you observed in how the EACFFPC project has been developed and rolled out over time? 3. How well has the management and coordination of the EACFFPC project worked? What lessons can be learned? 4. How sustainable do you think the EACFFPC project is?



Respondent Category	Planned questions
Category F: FEAFFA	<ol style="list-style-type: none"> 1. What has been your impression of the impact of the EACFFPC on your members and their clients? 2. How beneficial do you feel increases in the standard of freight forwarding and clearing services will be in addressing the main issues / challenges in the logistics sector in East Africa? 3. What impact, positive or negative, has the EACFFPC training course had on FEAFFA? 4. What impact do you think the obligatory training certification for licensing of freight forwarders or clearing agents has had / will have on the logistics sector and the actors within the sector? 5. How important has this EACFFPC training programme been for the FEAFFA? 6. What have been the main challenges in delivering this project and how have they been overcome? 7. What could be improved, if anything, to make the training more accessible to all freight forwarders and clearing agents, men and women? 8. What efficiencies or inefficiencies have you observed in how the EACFFPC project has been developed and rolled out over time? 9. Could there have been, or might there be in future, a more effective and sustainable implementation model or approach to training of FFs and CAs across the region? 10. To what extent do you feel any benefits for FEAFFA are sustainable? 11. To what extent does FEAFFA intend to continue involvement in EACFFPC training in the future?
Category G: TMEA	<ol style="list-style-type: none"> 1. How beneficial do you feel increases in the standard of freight forwarding and clearing services will be in addressing the main issues / challenges in the logistics sector in East Africa? 2. What impact do you think the obligatory training certification for licensing of freight forwarders or clearing agents has had / will have on the logistics sector and the actors within the sector? 3. What have been the main challenges in delivering this project and how have they been overcome? 4. What efficiencies or inefficiencies have you observed in how the EACFFPC project has been developed and rolled out over time? 5. Could there have been, or might there be in future, a more effective and sustainable implementation model or approach to training of FFs and CAs across the region? 6. To what extent do you think the EACFFPC is sustainable? 7. What lessons do you think TMEA can learn from this project?



Annex F: Survey questions issued to EACFFPC graduates

Question 1
Did the EACFFPC training provide you with new and/or improved knowledge and skills?
Question 2
How useful has the training been in helping you to do your job better?
Question 3
Has the EACFFPC training helped you to offer a quicker service to your clients (i.e. importers / exporters)?
Question 4
Has the EACFFPC training helped you to offer a lower costs service to your clients (i.e. importers / exporters)?
Question 5
Have you shared any knowledge or skills you have obtained through the EACFFPC training with your colleagues?
Question 6
Do you feel you have experienced improved engagement with border agencies (e.g. customs) since undertaking this EACFFPC training?
Question 7
We would like to have your view on whether this training was good value for money. Please rate the value for money of this EACFFPC training, with 1 being poor value for money and 5 being excellent value for money.



Annex G: Stories of change collection form used

Summative Evaluation of EACFFPC – MSC Story Collection Guide

Introduction:

We are hoping to capture some stories about changes that may have resulted from the EACFFPC project. If you are happy to participate in this, I will ask you 3 or 4 questions and record your answers. I will go over what I have written at the end to make sure you are happy with it.

We hope to use the stories and information collected from this interview for a number of purposes including:

- to help us understand what impact, positive or negative, that this project may have had;
- to inform potential improvements to this and similar projects in the future
- to tell the project funders what has been achieved

Confidentiality

We may like to use your stories for reporting to the project funders, or sharing with others involved in the project, or others interested in the project.

Do you (the storyteller):

- consent to your name being cited as the source of the story (tick one)

Yes

No

- consent to us using your story for publication (tick one)

Yes

No

[NOTE: If the person does not allow the publication of the story, do not ask them to tell a story. Ask someone else]

Contact Details

* Name of storyteller _____

Name of person recording story _____

Location _____

Date of recording _____

Sex (tick one) Female Male

** [(If they wish to remain anonymous, don't record their name or contact details – just write "EACFFPC graduate" or "Importer / Exporter" as relevant]*

Questions



1. Can you list a number of good and bad (or positive and negative) changes that you, or your firm, has experienced as a result of the EACFFPC training and certification?

1.

2.

3.

4.

5.

2. Thinking about the changes discussed (refer to list above), from your point of view, which change do you think was the *MOST* significant change?

Can you take us through this change in the form of a story please? (i.e. what was the situation before the change occurred, how and why did the change come about, and what has been the results of the change?)

Beginning (what was the situation before the change)

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Middle (How did the *change* come about? what happened?)

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End (what was the situation after the change?)

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3. Why did you choose this change in particular? *Why was it particularly significant for you?*

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4. What title would you give your story?

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Annex H: List of participants in semi-structured interviews

Respondent category	Respondent name	Company/ organisation
Category A: EACFFPC trainees / graduates	Samson Gitari	Worldclass Freight Logistics.
	Daudi J Daudi	Bero Co. Limited
	Rahema Said Kiangi	Mohammed Enterprises
	Reynold Kweka	Euro Max Ltd
	Adolph Kombe	Swift Global Logistics (DSV Swift Tanzania from 1 April 2015)
	Samo Moran	Swif Global Logistics
	Augustino Gerwin Kassopa	Ace Exim Co Ltd.
	Agnes Kiriimi	Lemco Freight
	Grace Kabira	Pre-Shipment Logistics
	Hellen Kamu	Bolllore Logistics
	Janet Wanjiru	Arbiters Group
	Jean de Dieu Ihakaniyeyose	Bolllore
	Brian Issa Biryomumaisho	Freight Logistics
	Susan Mukankubana	Top Freight
	Joseph Gasana	Good Freight Ltd.
Josephine Nyebaza	Intra Cargo Ltd.	
Category B: Importers / Exporters	Therese Karitanyi	Agropharm Africa Ltd.
Category C(i): Revenue authorities (licencing officials)	Kayitesi Peace	Rwanda Revenue Authorities
	Nuwagaba Fred	Rwanda Revenue Authorities
	Philip Chirchir Boniface	Kenya Revenue Authorities
	Dennis Malembo	Tanzania Revenue Authorities
Category C(ii): Revenue authorities (customs clearance officials)	Jeremy Kosge	Kenya Revenue Authorities
	Dr Patrick Mugoya	Tanzania Revenue Authorities
	Christine Nibarere	Rwanda Revenue Authorities
	Nuwagaba Fred	Rwanda Revenue Authorities
Category C(iii): Revenue authorities (training institutes)	Shehe Mzungu	KESRA
	Glycerie Umubyeyi	RRA
	Joseph Ckikongoye and Emmanuel Masalu	ITA
	Grace Chege	KIFWA
Category D: National freight forwarder associations	Boaz Mauomere	KIFWA
	Wycliffe W. Wanda	KIFWA
	Dennis Ombok	KIFWA Mombasa
	Jennifer Mwangi	KIFWA Mombasa
	Solomon Kasa	TAFFA
	Fred Seka	ADR (Rwanda Freight Forwarders Association)



	Edward Karamuzi	ADR (Rwanda Freight Forwarders Association)
	Josephine Nyebaza	ADR (Rwanda Freight Forwarders Association)
Category E: <i>Regional and national training coordinators</i>	Dan (surname unrecorded)	Formerly ADR (Rwanda Freight Forwarders Association)
	John Layaa	EACFFPC training coordinator for TAFFA
Category F: <i>FEAFFA</i>	John Mathenge	FEAFFA
	Elias Baluku	FEAFFA
Category G: <i>TMEA</i>	Alex Rusita	TMEA
	Nina Wakube	TMEA
	Elizabeth Mwangi	TMEA
	Dieudonne Dukundane	TMEA
	Judy Ng'ang'a	TMEA
	Antaria Karimba	TMEA Rwanda



Annex I: Project documents reviewed during evaluation

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- Davies, Rick and Dart, Jess (2005) “The ‘Most Significant Change’ (MSC) Technique - A Guide to Its Use”, available from <http://www.mande.co.uk/docs/MSCGuide.pdf>
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- EAC Secretariat (2012) Pilot Regional Time Release Study: Northern Corridor. EAC Secretariat: Arusha, Tanzania.
- EACFFPC (2012) Basic Management Training Manual.
- EACFFPC (2012) Customs Laws and Procedure Training Manual.
- EACFFPC (2012) EACFFPC Curriculum.
- EACFFPC (2012) Ethics and Integrity Training Manual.
- EACFFPC (2012) Freight Forwarding Module Training Manual.
- EACFFPC (2012) Implementing ICT - ASYCUDA World Training Manuals.
- EACFFPC (2012) Revised Training Policy.
- EACFFPC (2012) Rules of Origin Training Materials.
- EACFFPC (2012) SIMBA 2005 Declaration Manual.
- EACFFPC (2012) SYCUDA ++ Training Materials.
- EACFFPC (2012) Valuation and Tariff Classification Training Manual.
- FEAFFA (2012) Accounting Policies Procedure Manual.
- FEAFFA (2012) Code of Ethics - Leadership Code.
- FEAFFA (2012) Communication Policy.
- FEAFFA (2012) Data Back-Up Policy.
- FEAFFA (2012) FEAFFA Fundraising and Sustainability Strategy 2013 - 2015.
- FEAFFA (2012) Human Resources Management Policies and Procedures Manual.
- FEAFFA (2012) Procurement Policies and Procedures Manual.



- FEAFFA (2013) FEAFFA Monitoring Training Data 18082013 - *A table that breaks down the number of participants registered, no. of drop-outs, no. that passed exams and no. that failed exams.*
- FEAFFA (2013) FEAFFA Strategic Plan 2014 - 2016.
- FEAFFA (2013) Framework for Implementation of the East Africa Customs and Freight Forwarding Practising Certificate (EACFFPC) Curriculum.
- FEAFFA (2013) Request for Grant Extension from TMEA.
- FEAFFA (2014) EACFFPC Data Summary Sept 2014 - *A table that aggregates the total number of graduates from 2007 – 2014, disaggregated by country and gender.*
- FEAFFA (2014) EACFFPC Output Trend from 2007 - September 2014 - *A table that breaks down the number of graduates in each year by country and gender.*
- FEAFFA (2014) FEAFFA EACFFPC Quarterly Progress Report Q1 2014.
- FEAFFA (2014) FEAFFA End of Project Report for EACFFPC - *Final narrative report for EACFFPC.*
- FEAFFA (2014) Quarterly Financial Report Q1 2014.
- FEAFFA (2014) Response to KPMG due Diligence Assessment.
- Hoekman, Bernard and Nicita, Alessandro (2008) Trade Policy, Trade Costs, and Developing Country.
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- Rwanda Revenue Authority (RRA) (2014) Public Notice: Licensing of Customs Clearing Agencies for 2014.
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- Shippers Council of East Africa (2014) East Africa Logistics Performance Survey. SCEA: Nairobi, Kenya.



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- The Donor Committee for Enterprise Development (DCED) (2013) Case Study 3: Impact Assessment of EACFFPC Training Course on Freight Forwarder Performance in Rwanda with TMEA.
- TMEA (2011) Project Appraisal Report - Transport, Infrastructure and Logistics Improvement.
- TMEA (2013) How to Note on Evaluation.
- TMEA (2013) Output Monitoring Data for All Countries at End of Oct 2013 - A table that contains trainee data, covering enrolment as well as drop-out and pass rates.
- TMEA (2013) TMEA EACFFPC Project Overview - *A monitoring document containing data on baselines and targets for the number of people completing the course as well as pass and drop-out rates.*
- TMEA (2014) Detailed Workplan for EACFFPC Activities for January - September 2014.
- TMEA (2014) EACFFPC Training Programme Project Monitoring Plan.
- TMEA (2014) EACFFPC Training Programme, Annual Project Performance Report (Jul 2013 - Jun 2014).
- TMEA (2014) Project Appraisal Report, Extension of FEAFFA Institutional Support.
- TMEA (2014) Propositions Underpinning TMEA's Strategy.
- TMEA (2014) TMEA's Monitoring, Evaluation and Learning - Version 2.0.
- TMEA-FEAFFA (2013) Grant Oct - Dec 2013, Financial Report.
- TMEA-FEAFFA (2014) Grant Sept 2014 Financial Report.
- Uganda Revenue Authority (2008) Time Release Study Report. URA: Kampala, Uganda.



Annex J: Terms of reference

CONTRACT FOR CONSULTANCY SERVICES

Section 3 – The Services

TERMS OF REFERENCE

Summative Evaluation of the East Africa Customs and Freight Forwarding Practicing Certificate Training Programme (EACFFPC)

1. Background

TradeMark East Africa (TMEA) aims to improve trade competitiveness in East Africa by reducing transport time/costs and improving the trade environment. It targets an increase in trade of 10% (above trend) by 2016, contributing to sustained economic growth and poverty reduction. TMEA was officially launched in February 2011 as a specialist not-for-profit organisation to implement a programme to promote trade growth in East Africa. TMEA is currently funded by the UK, Belgium, Canada, Denmark, Finland, Netherlands, Sweden, and USA. TMEA's secured budget to date totals about \$540m. The programme is currently scheduled until June 2016 with the possibility of a new programming phase beyond that.

Summary of the project

The EA Customs and Freight Forwarders Practicing Certificate Training programme (EACFFPC) is implemented by the Federation of East African Freight Forwarders. The association closely works with the Uganda Revenue Authority, Rwanda Revenue Authority, Kenya Revenue Authority, Tanzania Revenue Authority, and Burundi Revenue Office. FEAFFA is registered and domiciled in the United Republic of Tanzania in 2006 but its Secretariat is located in Nairobi, Kenya. Current member associations are Association Burundaise des Agences en Douane et Transitaires (ABADT), Kenya International Freight & Warehousing Association (KIFWA), Association des Agences en Douane du Rwanda (ADR), Tanzania Freight Forwarders Association (TAFFA) and Uganda Freight Forwarders Association (UFFA). It represents over 2500 clearing and forwarding firms in East Africa.

FEAFFA aims at reducing freight logistics costs in the East African region through improved knowledge and skills of freight forwarders and clearing agents. This is through implementation of a regional training programme for freight forwarders and clearing agents with the aim to improve their knowledge and skills and contribute to increasing the general levels of professionalism across East Africa. It is expected that this will then lead to reduce transport and related costs along the key corridors in East Africa.

The training programme started in 2007 with support from USAID. Since 2011, with assistance from TradeMark East Africa (TMEA), the EACFFPC curriculum has been reviewed, and training capacity expanded in order to achieve a critical mass of 4,500-trained Customs Agents. Once the critical mass has been achieved, possession of the certificate issued by this programme will become a precondition for acquiring a customs agent operating licence within the EAC.

The programme is implemented in Burundi, Kenya, Rwanda, Uganda, and Tanzania. Further information is contained in the project sheet annexed to this TOR.



2. Purpose

TMEA aims to conduct a summative evaluation for the EACFFPC Training programme. The primary purpose of the evaluation is to review and measure the level of success of the project against planned outcomes as well as establish initial project impact, project efficiency, identify and feed lessons learned into the management of current and future projects. The feedback will be used to improve on-going projects and give strategic direction to future TMEA/ trade facilitation programmes. The evaluation is also expected to identify good practices or models that can be documented and showcased for learning, scale up and replication.

Specifically, at the programme level, the evaluation will determine the extent to which the project has led to:

- A reduction in the number of errors committed by customs agents when lodging customs entries and the resulting reduction in time to clear consignments through customs;
- Further reduction in the time it takes customs agents to clear consignments through customs due to other improvements in cargo clearing practices;
- Reduction of incidences of corruption or other non-compliance to the law;
- The evaluation is also expected to determine the extent to which FEAFFA exhibited organisational and technical capacity for delivery, demonstrated financial integrity and soundness, managed risks associated with the project and demonstrated ownership of the project implementation and results; and
- The cost benefits arising from TMEA contribution to the intervention.

3. Recipient

The primary audience for the evaluation is TradeMark East Africa, the Joint Evaluation Group (JEG²¹), FEAFFA and its member associations, their key stakeholders as well as development partners. The findings are also expected to be used by TMEA and the Programme Investment Committee (PIC) to inform the on-going implementation of TMEA's strategy and in particular, those sub-strategies that concern reducing trade costs.

4. Evaluation scope and objectives

The EACFFPC training programme is implemented in Kenya, Uganda, Tanzania, Burundi, and Rwanda. The Consultant is expected to cover the geographical areas where the programme is implemented. The consultant will contact as many stakeholders as possible to ascertain the extent to which the training objectives were achieved including critical mass numbers, and other critical successes factors, challenges encountered and lessons learnt from the programme. The evaluation scope will be guided by the evaluation questions as detailed below.

The summative evaluation will address the following five categories of questions:

Effectiveness:

²¹ The JEG is an advisory sub-committee of the PIC, TMEA's oversight body. Joint Evaluation Group (JEG) is in place to steer and advise the monitoring and evaluation of the TMEA programme at key strategic points. It provides strategic direction on the independent evaluation, and has a strong coordination and facilitation role across the evaluative exercises and to ensure lessons learnt are taken forward.



Effectiveness refers to the extent to which a development intervention has achieved its objectives, taking their relative importance into account.

The following key questions will be answered;

- To what extent were the objectives achieved?
- To what extent can identified changes be attributed to the intervention? What would have occurred without the intervention?
- If gender mainstreaming targets were set at project inception, examine the extent to which targets were achieved, successes and challenges²².

➤ **Impact:**

The evaluation will answer the following key questions:

- What was the impact of the project (intended and unintended, positive and negative)?
- What was the intervention's measurable impact to reduction in costs and time to transport goods along the EAC corridors?

➤ **Relevance:**

Relevance is the extent to which a development intervention conforms to the needs and priorities of the target groups, the policies of recipient countries and donors and TMEA's strategy.

The evaluation will answer the following questions:

- Is the intervention well in tune with the trade/development policies and administrative systems of the partner country government and EAC policies and systems?
- Is the intervention consistent with TMEA's policies and priorities? Is the intervention consistent and complementary with activities supported by other programmes in TMEA and/or by other donor organisations?

➤ **Sustainability:**

Sustainability is the continuation or longevity of benefits from a development intervention after the cessation of development assistance.

The evaluation will answer the following questions:

- What benefits (both social and financial) of the programme are likely to be sustainable and would continue with or without TMEA?
- What are the lessons learned that are relevant beyond TMEA?

➤ **Efficiency:**

Efficiency is the extent to which the costs of a development intervention can be justified by its results, taking alternatives into account.

²² Efforts to mainstream gender across TMEA have been relatively recent. For this reasons most of the projects did not have a policy to measure and monitor the different impact on men and women at project inception. The main purpose of including gender in the evaluation is to map out the existing gender practice, draw on the lessons learnt and assess the challenges faced to inform the TMEA gender policy and incorporate gender issues into the TMEA phase II programme.



The evaluation will answer the following key question:

- To what extent and how has the intervention been effective and achieved good Value for Money (VfM)?

Subsidiary indicative set of sub-questions linked to the key questions is provided in Annex 3.

5. Methodology

The consultant will use scientific and technical methods of collection and organising data. The consultant also use mixed methods to appropriately assess the processes and impacts of interventions. Methods should be tailored to the problem at hand and the resources available. The consultant should aim to collect only information that will be of use and that will achieve high response rates. The consultant must employ multiple mechanisms to ensure data quality and appropriate levels of validation. The consultant should consider opportunities to adjust data collection to optimise it across other TMEA evaluation work. Bidders are required to justify the evaluation approach they intend to use.

TMEA Trade and Logistics team, FEAFFA and EACFFPC training coordinators and TMEA results team will work with consultants to identify the data, key informants and stakeholders to interview and/or survey, the questionnaire and/or survey instrument questions, as appropriate, and to ensure the evaluation team has adequate access to relevant documentation. Data will be collected from the following key sources: Methods used may include analysis of desk Survey (secondary data), informal and formal stakeholder interviews, focus groups, and data triangulation.

Throughout the evaluation, lessons learned should be identified that may be relevant beyond TMEA in order to inform future Phase 2 programming as well as contribute evidence towards comparative effectiveness of regional programming.

Desk Survey: The desk review will entail a detailed review of relevant project documents that will be availed by FEAFFA and TMEA. These will include the Project Appraisal Reports (PAR), project work plans, monitoring plans (including results chains), risk plans, quarterly and annual progress reports as well as FEAFFA and TMEA Theory of Change/Strategy among others. To assess impact of the project, the evaluators will also undertake an online review of relevant information relating to the project.

Interviews and focus group discussions: The evaluators will have the options of conducting structured and semi structured interviews as well as focus group discussions and Key informant interviews for information gathering. Due attention will be paid to language to ensure effective communication. The consultant is expected to document selected case studies show casing positive impact.

Project site visits: The project sites will be visited and the target beneficiaries will be interviewed to ascertain their perspective and experiences. When possible, photos, video clips and audio recordings of the interviews will be collected. The consultant is expected to document selected case studies show casing positive impact where applicable.

Periodic management meetings will be held with the TMEA Trade and Logistics team, FEAFFA and EACFFPC training coordinators and the Results Director. Information from different sources, e.g. existing documentation and interviews, focus group discussions will be triangulated.

6. Expected Deliverables

The evaluation team is expected to provide the following deliverables:



- A detailed inception report with a work plan and draft data collection tools two weeks after signing the contract. The detailed inception report should comprehensively demonstrate the technical approach (including sampling methodology, key questions, data collection and analysis methods and tools; work plan (including regional travel schedule) that will be effectively and efficiently address the evaluation question within the consultancy timeframe;
- A 1st draft evaluation report submitted to TMEA Trade logistics and results team as well as FEAFFA executive director for review and input;
- A 2nd draft evaluation report that will be presented to the Joint Evaluation Group committee, TMEA Senior Management and Leadership Teams, Project and senior management team for review and validation;
- A final draft evaluation report will be presented to the National Oversight Committee and the TMEA Programme Investment Committee (PIC) for adoption. The final report will be a written report (Ms Word) with an executive summary and a Power point presentation on key findings, conclusions, and recommendations; and
- During the interviews and trips, the Evaluators will record and take photos at project sites and during some of the interviews of the stakeholders, which will be submitted along with the reports at the end of the evaluation.
- The evaluation report shall be written in English, be of no more than 20 pages (excluding annexes), use numbered paragraphs and should be structured into 3 sections; the first part will be devoted to the evaluation of the relevance, effectiveness and efficiency of the project; the second part will provide an analysis of sustainability and the scaling up of the project approach; and the third part will focus on recommendations for future directions.. Annexes will provide detailed information collected during field visits (focus discussion reports, summaries of interview sheets, summaries of responses to questionnaires).

7. Commencement date and period of execution

The formative evaluation will be executed over a period of (6 weeks) starting from 1st December 2014. A detailed work plan with clear and measureable deliverables and timelines should be included in the technical proposal for this consultancy and the awarded consultant(s) will develop and finalise the proposed work plan and budget (as part of the inception report) within 2 weeks of starting the assignment.

Schedule of deliverables	Deliverables Deliverable Due Date
Contract signed	16 January 2015
Inception report	28 January 2015
First draft project evaluation report	27 February 2015
Second draft project evaluation report	13 March 2015
Final project evaluation report	20 March 2015

8. Budget for evaluation



The total budget for this evaluation is not expected to exceed USD 75,000.

9. Evaluation team composition and required competencies

To ensure the independence of the evaluation and the credibility of the findings, the evaluation will be conducted by a team of external consultants identified through a transparent selection process. The team will include members with an appropriate balance of expertise in evaluation methodologies, relevant technical expertise and practical experience. The Evaluation team leader is expected to be an evaluation professional with substantial successful experience leading and managing evaluation assignments, particularly relating to trade facilitation in developing countries and have in-depth knowledge of the latest evaluation methodologies. The team leader should have at least 10 years' experience.

The Evaluator (s) should combine the following expertise and experience:

- Experience of designing and undertaking evaluations of multi-component development programmes, using mixed methods approaches that meet recognised standards for credibility and rigor;
- Education qualification of at least a Master's Degree (Team Leader) and Bachelor's Degree (Team members) in Development Studies, Economics or relevant Social Sciences;
- Demonstrated experience of using evaluations as a tool for lesson-learning both during programme implementation and beyond;
- Strong stakeholders management skills and ability to work flexibly with donors, partner countries, private sector entities; demonstrated ability to manage and sensitive relationships tactfully and productively;
- Strong understanding of the strengths and limitations of different designs and how to interpret and present findings accurately to both researchers and non-researchers;
- Strong understanding and demonstrated experience of various quantitative and qualitative evaluation methodologies for demonstrating impact;
- In-depth knowledge of trade issues, particularly in East Africa, and experience of working on evaluations of trade policies and programmes;
- Understanding of social inclusion and gender issues in programming in East Africa;
- Strong communication skills: Being strategic as well as able to communicate complex studies and findings in an accessible way for non-technical people.

10. Implementation arrangements

The Evaluator will be responsible for all logistic arrangements required to conduct the evaluation work. TMEA will facilitate convening of meetings and site visits where necessary. All relevant expenses should be covered by the evaluation contract budget.

The evaluation consultant will report to TMEA Results Director, who will manage day to day contractual and organisational issues with the evaluation team, monitor implementation progress, and provide progress updates to the Joint Evaluation Group (JEG). The evaluation consultant will work closely with the TMEA Trade Facilitation Team, Strategic Objective Team Leader, and relevant staff in FEAFFA.

Governance and quality assurance maybe strengthened further by peer reviewers. The role of the peer reviewers will be to review the scientific and technical quality of the evaluation; to ensure that the design and implementation of the evaluation is robust and credible, and will stand up to external scrutiny. The final evaluation report will be presented to the JEG and subsequently to the PIC for review, quality assurance, acceptance, and signing off.



Annexes:

1. Project Sheets;
2. List of Documents to be reviewed; and
3. Indicative sub-questions for key question in section 4



Annex 1: Project Sheets

Project name	EACFFPC training programme
Desired results	Reduction in freight logistics costs in the East African region through improved knowledge and skills of freight forwarders and clearing agents. This will help reduce transport and related costs along the key corridors in East Africa. ²³
Implementer	Federation of East African Freight Forwarders, Uganda Revenue Authority, Rwanda Revenue Authority, Kenya Revenue Authority, Tanzania Revenue Authority, Burundi Revenue Office
Target Group	Cargo clearing and forwarding agents
Value (USD)	
Implementation period	2011 - 2015
Geographical Focus	Burundi, Kenya, Rwanda, Uganda, Tanzania
Why?	The COMESA/SADC/EAC Tripartite Forum has recognised reducing high freight costs as a necessary condition for achieving regional integration (RI), fast and broad based economic growth and poverty reduction. High transport and logistics costs in East Africa are caused by poor infrastructure, cumbersome transit procedures and inefficient transport and logistics. The freight logistics industry in East Africa has been largely characterised by poor business practices. This is generally due to lack of specialised skills and limited use of modern technologies. Hence attempts by the public and private sectors to raise the professional standard of clearing and forwarding agents, who are recognised as a key player in trade logistics.
What?	Upgrading of regional training programme for freight forwarders and clearing agents with the aim to improve their knowledge and skills and contribute to increasing the general levels of professionalism across East Africa. Key outputs: • Review and update of the curriculum and training materials • High-level policy forum approve revised policy framework governing programme implementation • Training of trainers • Eight new training centres established and one centre's capacity doubled • Monitoring and evaluation of training programme • Training coordinators implement communications strategy • Training for COC • Achieve critical mass of 4500 by June 2014.







²³ Important to note that the project was designed and aligned to TMEA old theory of change (2011). TMEA has a new ToC that was approved in 2014.






How?

TMEA is providing the required technical and financial assistance to Federation of East African Freight Forwarders Associations to support the training.

Annex 2: List of documents

DOCUMENT	DETAILS
<p>PAR 20 – Transport Logistics</p>  <p>PAR 20 -Transport_Logistics.</p>	<p>Summary analysis of what was proposed to improve Transport, Infrastructure and Logistics. The Project Appraisal Report (PAR) is the formal approved document used to guide project implementation and control. The PAR highlights:</p> <ul style="list-style-type: none"> • Background and Project description details • Expected outputs and outcomes • Work plan • Key linkages to other TMEA Rwanda projects • Funding approach and budget • Gender and other cross cutting issues • Value for money and risk analysis
<p>Project Sheet</p>  <p>Project overview-Results Chz</p>	<p>Summary description of the project that clarifies the desired results and the working of the project: why, what and how.</p>
<p>Project work plan FEAFFA</p>  <p>EACFFPC detailed work plan Jan -Sep 2014</p>	<p>Formal document that defines the project activities and outputs and describes how and when the activities will be performed (the estimated time and resources). The work plan provides a framework for management review and control.</p>
<p>Project Results Chain and monitoring plan</p>  <p>Project overview-Results Chz</p>	<p>A Results Chain and Monitoring plan for FEAFFA that details key M&E requirements for each indicator and assumption i.e. Baselines and targets at output and outcome levels.</p>
<p>End of project report</p>  <p>End of project report.docx</p>	
<p>Jan - March Quarterly Programme report</p>  <p>Jan - March Quarterly Programme</p>	<p>Formal document from FEAFFA that reports/provides synthesis of the progress and achievements, for the reporting period of Jan – March 2014.</p>
<p>Weekly Status Report 29th April 2013</p>	<p>Sample - This report outlines the activities carried out in the two weeks between the 22nd-26th April 2013 project and in specific scope of the work plan presented in the inception report.</p>



DOCUMENT	DETAILS
 Weekly Status Report 29th April 201	
FINAL FEAFFA STRATEGIC PLAN - March 2014  FINAL FEAFFA STRATEGIC PLAN - M	The 2014-2016 plan sets and supports the strategic direction of FEAFFA.
PAPER J - TMEA Theory of Change – Explanation  PAPER J - TMEA Theory of Change - E	Paper that articulates in detail the propositions, assumptions and beliefs behind TMEA’s strategy(Theory of Change)



Annex 3: Indicative sub-questions for key questions in section 4.

1. Effectiveness

- 20 How far were the intended outputs and results achieved in relation to targets set in the monitoring plan?
- 21 What were the major factors influencing the achievement or non-achievement of the objectives?
- 22 Were the programme's expected impact and results logically and explicitly defined in project documents including in the results framework?
- 23 What has the impact been on corruption across the various components?
- 24 Did the project management have a system in place for tracking the effectiveness of the projects progress towards its stated desired short and midterm outcomes? Was this system used to make decisions to change its activities accordingly?
- 25 Examine the extent to which monitoring and evaluation is/was integrated in the project cycle; and
- 26 Examine the effectiveness of networks and coordination created.

2. Impact

- 27 What do beneficiaries (men and women) and other stakeholders affected by the intervention perceive to be the effects of the intervention on themselves?
- 28 What is the impact of the intervention on FEAFFA? To what extent does the intervention contribute to capacity development and the strengthening of institutions?
- 29 To what extent can changes that have occurred during the life span of the intervention or the period covered by the evaluation be identified and measured?
- 30 To what extent has the programme benefitted women and girls?
- 31 Have measures been taken and been successful in mitigating potential negative impacts on any sub-groups, in particular poor people in localised areas?
- 32 To what extent can identified changes be attributed to the intervention? What would have occurred without the intervention?
- 33 Have plausible alternative explanations for identified changes been considered and convincingly ruled out?
- 34 What has happened as a result of the programme or project?
- 35 What real difference has the activity made to the beneficiaries?

3. Relevance

- 36 Has the intervention been developed with the inclusion and participation of project partners?
- 37 Is the intervention a technically adequate solution to the development problem at hand? Does it eliminate the main causes of the problem?
- 38 Do proposed innovations have a potential for replication?
- 39 Are the activities and outputs of the programme consistent with the overall goal and the attainment of its objectives?



- 40 Are the activities and outputs of the programme consistent with the intended impacts and effects?

4. Sustainability

- 41 What were the major factors, which influenced the achievement or non-achievement of sustainability of the programme or project? To what extent, were these issues known before the end of the project or programme and what was done to mitigate them?
- 42 What should be the essential components of a future exit strategy in order to sustain impact?
- 43 Is the intervention consistent with partners' priorities and effective demand? Is it supported by local institutions and well integrated with local social and cultural conditions?
- 44 Do partners have the financial capacity to maintain the benefits from the intervention when donor support has been withdrawn?
- 45 Are requirements of local ownership satisfied? How are stakeholders engaged through the projects and beyond its life? Did partner country stakeholders participate in the planning and implementation of the intervention?
- 46 Is the technology utilised in the intervention appropriate to the economic, educational, and cultural conditions in the partner country?
- 47 Is the intervention compatible with a sustainable use of natural resources? Or is it harmful to the natural environment?
- 48 Did the projects have clear and comprehensive exit strategies that were regularly monitored?

5. Efficiency

- 49 Has the evaluated intervention been managed with reasonable regard for efficiency?
- 50 What measures have been taken during planning and implementation to ensure that resources are efficiently used?
- 51 Could the intervention have been implemented with fewer resources without reducing the quality and quantity of the results?
- 52 Could more of the same result have been produced with the same resources?
- 53 Was the intervention economically worthwhile, given possible alternative uses of the available resources? Should the resources allocated to the intervention have been used for another, more worthwhile, purpose?
- 54 Were activities cost-efficient?
- 55 Were outputs and outcomes achieved on time?
- 56 Was the programme or project implemented in the most efficient way compared to alternatives?
- 57 To what extent was risk management integrated in the programme? How often were risks identified, analysed and incorporated in programme design?
- 58 How efficient and effective were the management and administration systems and procedures including programme results framework and reporting?