



## Project evaluation: Summary report

African Great Lake Region (Africa N.A.): Development of a Regional Mechanism to curb Illegal Trade with Conflict Minerals

Project number:	2011.2202.7
CRS Purpose Code:	15110 Public sector policy and administrative management
Project objective:	The regional and national structures of the ICGLR provide sustainable and effective support to the Member States for the implementation of the Regional Initiative against the Illegal Exploitation of Natural Resources (RINR).
Project term:	07/2012-12/2016
Project volume:	11.500.000 EUR
Commissioning party:	German Federal Ministry for Economic Cooperation and Trade ( <i>Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung, BMZ</i> )
Lead executing agency:	International Conference on the Great Lakes Regions (ICGLR)
Implementing organisations (in the partner country):	International Conference on the Great Lakes Regions and selected Member States mining authorities (Burundi, Democratic Republic of Congo (DRC), Ruanda); <i>Ley Mwanawasa</i> Regional Centre in Lusaka (Sambia); <i>Coalition de la Société Civile de la Région des Grands Lacs contre l'exploitation illégale des ressources naturelles (COSOC/GL)</i>
Other participating development organisations:	Co-financing agreement with the European Commission (3.000.000 EUR)
Target groups:	Population, which is most affected by illicit exploitation and trade with minerals in selected ICGLR Member States (Burundi, DRC, Ruanda and Uganda).

### Project description

The Pact on Security, Stability and Development of the International Conference on the Great Lakes Region (ICGLR) was signed in December 2006 by 12 signatory countries. These countries of Central Africa are Burundi, Rwanda, the Democratic Republic of the Congo (DRC), Kenya, Uganda, Republic of Congo, South Sudan, Sudan, Zambia, Angola, Tanzania and the Central African Republic. The pact is an important milestone for the pacification of the Great Lakes Region troubled by armed conflict. The German Development Cooperation (DC) supports the Secretariat of the ICGLR in the implementation of the Pact. One result of the Pact is the Lusaka declaration, which has been adopted in December 2010 by all Member States of the ICGLR. In this declaration, the Regional Initiative against the Illegal Exploitation of Natural Resources (RINR) was agreed. With six complementary instruments, this initiative seeks to prevent the illegal exploitation and trade in minerals

that was identified repeatedly as an engine for armed conflicts in the region. The permanent secretariat of the ICGLR has the mandate to facilitate and coordinate the task of the sector authorities of the Member States in the practical implementation of the RINR. However, the regional and national structures of the ICGLR are not yet effective to support Member States in implementing the RINR. The project objective is “the regional and national structures of the International Conference of the Great Lakes support effective and sustainable Member States in implementing the RINR”.

Since 2011 the German Development Partnership Program “Support to the International Conference of the Great Lakes Region” has been implemented by the German Agency for International Cooperation (*Deutsche Gesellschaft für Internationale Zusammenarbeit*, (GIZ) GmbH) and the German Federal Institute for Geosciences and Natural Resources (*Bundesanstalt für Geowissenschaften und Rohstoffe*, BGR) on behalf of the German Federal Ministry for Economic Cooperation and Development (*Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung*, BMZ). The GIZ part “*Development of a Regional Mechanism to curb Illegal Trade with Conflict Minerals*” complements the BGR measures and sustainably ensures progress with regard to certification. The overall programme objective is as following: The ICGLR signatory countries implement the Regional Initiative against the Illegal Exploitation of Natural Resources (RINR) in accordance with the Lusaka Declaration.

The German Development Cooperation, through GIZ and BGR, has been a key supporter of the ICGLR. GIZ effectively started supporting the ICGLR Secretariat in 2004. The Secretariat, as well as the National Coordination Mechanisms (NCM) established for this purpose, are responsible for implementing the Pact for Security, Stability and Development. The GIZ ICGLR module is currently in its third phase which started in 07/2012; it runs until the end of 2016 (first phase: 10/2004 until 12/2007; second phase: 01/2008 until 06/2012).

Burundi is the host country of the ICGLR permanent Conference Secretariat. As a result of the political crisis in the context of the Burundi in 2015, the German Government suspended its technical assistance to Burundian state institutions. In addition, international advisors of the German DC were relocated from Burundi in November 2015. This resulted in a physical separation between international advisors and the partner, which is an unusual and complex situation for the program to be in.

The GIZ ICGLR module is adopting a policy advisory and intensive organisational development approach for the Conference Secretariat as the leading executing agency. Its approach is addressing structural gaps at the regional and national governance levels for implementing the RINR. Its strategy encompasses activities to promote human resource and institutional development as well as networking, which are combined with strategic advisory services at the macro level (e.g. high-level staff of the Conference Secretariat). This is intended to promote the development of instruments for cross-border control of extractive sector activities. The regional and particularly the national level support measures aim at three selected core countries with respect to prevalence of illicit mineral trade, the DRC, Burundi and Rwanda (direct support of Burundian state institutions was terminated in June 2015).

The project is built upon two main areas of activities: (i) Provision of advisory services on organisational development to the ICGLR Secretariat and (ii) Support of the regional and national structures around implementation of the RINR. With additional funding from the EU the project supports national capacity development measures regarding the national coordination mechanism in general as well as related to the RINR implementation. The underlying assumptions (hypotheses) of the GIZ ICGLR module are: a) Regional and national structures of the ICGLR have to be capacitated as a requirement for an effective and sustainable implementation of the RINR. b) Technical and procedural support to the sector authorities of its Member States by the Conference Secretariat will be required to support the implementation of the RINR at the national level. c) The Conference Secretariat needs to professionalize its steering and coordination function to exert its mandate.

The module objective is very ambitious, aiming at increasing effective implementation at the regional (Conference Secretariat; regional coordination mechanism) as well as at the national level (Member States). An essential lever to achieve this is to strengthen the capacities of the Conference Secretariat and to support the implementation at selected Member States (preconditions to achieve objective). The results model considers the specific conceptual framework of the Secretariat as an intergovernmental and political organisation with its function being the “Special Political Advisor to the Executive Secretary”. It is within the scope of the ICGLR Project that the implementation process takes gender issues into account. Overall, it pursues a rather technical approach in strengthening the implementation capacities of the Technical Unit (TU), which is tasked with assisting the member states in implementing the RINR. The TU is not sufficiently integrated into the overall organisational setup of the Conference Secretariat yet. The organisational culture of the Conference Secretariat as an intergovernmental body is predominantly shaped by its political mandate. Most of the higher management staff has a professional background of working as diplomats/civil servants, as the majority are nominated by the foreign offices of the Member States. The different functions of the ICGLR Secretariat should be kept in mind when addressing overall institutional strengthening of the Secretariat and the TU, whose role is more focused on technical service delivery. A key underlying assumption is that the six RINR tools are interdependent and complementary. Even though in theory, legal harmonisation forms the basis of RINR implementation, as the twelve Member States are rather heterogeneous regarding capacities and legal systems, the approach of the programme is plausible.

Moreover, the results logic follows a top-down approach through working within the ICGLR structures. However, in the last couple of years the dynamics of responsible sourcing have been driven more strongly by industry-led and/or

international initiatives. While the design of the strategic approach has, by and large, considered these dynamics, it has not paid due attention to experiences and vested interests of the private sector.

The basis for assessing the effectiveness of the ICGLR project are six module indicators:

M 1: 70% of the Secretariat's collaborators who were trained are concretely demonstrating practical application of skills and management tools acquired in their daily work.

M 2: To improve the financial situation of the ICGLR, 2 donor meetings are organised yearly by the Secretariat with the aim of securing external financing.

M 3: In Rwanda, Burundi and the DRC, there are a total of 6 examples of the RINR tools supported by the TC module which are implemented in line with a national implementation plan.

Note: The whistleblowing mechanism, harmonisation and the EITI tools have been partly elaborated but are still to be implemented

M 4: 50% of national actors involved (lead implementing sector administrations, civil society and private companies in Burundi, Rwanda and the DRC) have confirmed an improvement in the support received from the ICGLR regional and national structures for the implementation of the RINR.

M 5: The Secretariat represents the RINR in at least 3 international forums and private sector initiatives.

M 6: The guidelines elaborated by the ICGLR Secretariat on gender equality are being integrated in at least 3 national legislative processes on the mining sector.

Even though there are shortcomings of some module indicator definitions concerning the SMART criteria they are appropriate to measure the effectiveness of the ICGLR project. Concerning the overall impact of the ICGLR an assessment was made regarding its contribution to improving regional collaboration and management on mineral exploitation and trade through a better performing ICGLR Conference Secretariat.

Overall rating according to the OECD-DAC criteria:	Individual rating of the OECD-DAC criteria:
To determine the TC measure's overall rating, calculate the average of the individual ratings:	Relevance: 12 points - successful
14 – 16 points: very successful	Effectiveness: 12 points - successful
12 – 13 points: successful	Impact: 11 points - rather successful
10 – 11 points: rather successful	Efficiency: 12 points - successful
8 – 9 points: rather unsatisfactory	Sustainability: 8 points - rather unsatisfactory
6 – 7 points: unsatisfactory	Overall, the TC measure is rated rather successful with a total of 11 out of 16 points.
4 – 5 points: very unsatisfactory	

### Relevance (Are we doing the right thing?)

The project, with its key development objective of enabling the regional and national structures of the ICGLR Secretariat to support the member states efficiently and sustainably in the implementation of the RINR, does indeed aim to mitigate a core problem of the target group. The issue here certainly has to be seen in the fact that the project however can merely address the target group, i.e. the population of the Great Lakes region, as it works through the various constituent layers of the ICGLR, including national and regional structures, and the Secretariat of the ICGLR itself. Being foremost a project that supports the various layers of the organization, with the aim of enabling it to coordinate and guide the implementation of the RINR in its member states, it is consequently also part of the political layers, which in turn are the inherent engines of the organization. It is less clear, however, to what extent guiding policies and strategies of the regional and national mechanisms are used. Nevertheless, this is also because different Member States have different planning tools and country-level work is highly context-specific. In addition, it is not always obvious in how far the policies of the Secretariat and the NCM are domesticated or whether they are in accordance with national priorities (the whistleblowing mechanism being a case in point). In other cases, such national priorities seem to be in line with those of the project, as for instance is the case with the implementation of the Regional Certification Mechanism (RCM) in Rwanda, DRC and Burundi.

The relevance of the TC measure is rated successful with a total of 12 points.

**Effectiveness** (Will we achieve the project's objective?)

The module objective is “The regional and national structures of the ICGLR provide sustainable and effective support to the Member States for the implementation of the Regional Initiative against the Illegal Exploitation of Natural Resources (RINR)”.

Objectives indicator <sup>1</sup>	Target value according to the offer	Current situation according to the project evaluation
70% of the trained Secretariat staff document the practical application of their newly acquired management competencies and instruments with the aid of concrete examples from everyday work. Baseline value: 0%.	Target: 70%; Total number: 20	In terms of content, the training and coaching measures encompassed mainly the following skills: strategic and operational planning skills (e.g. staff retreat as key strategic planning session; annual activity calendar of events), analytical tools such as problem tree and SWOT-analysis and reporting skills (e.g. reporting formats). Another important issue addressed in the context of staff development was supporting teambuilding and making better use of synergies (to relate different programs better to each other). Moreover, tools for conducting data baselines have been introduced. There were some training for technical assistant staff (e.g. administration and financial support staff in June 2014) but a strong emphasis has been on the (executive) management level due mainly to priorities of the ICGLR Conference Secretariat. In addition, the project conducted training regarding organizational development issues (e.g. for the National Coordinators of Burundi, DRC and Rwanda). According to monitoring data, 50 % of the staff have been trained and “50% of the management competencies and instruments have been applied” (according to an internal training evaluation in February/March 2015). In interviews with the Deputy and selected POs, the trainings provided have been highly appreciated. It is likely that the training, coaching and systematic follow-up support by the external consulting company for the operational planning system has contributed to a better understanding of the importance of managing and planning instruments. Overall, the Module Indicator 1 will be to a great extent achieved.
To improve the financial situation of the ICGLR, the Secretariat will organise 2 donor meetings every year with the aim of acquiring external third party funds. Baseline value: 2 (up to 12/2013).	Target value: 8 (in the period 07/2012 to 12/2016)	A Sectoral Group on the RINR implementation has been established with the aim to ensure concerted and coordinated technical support to the Conference Secretariat and the Member States of the ICGLR for all support measures. Meetings took place in Zambia (June 2014), Uganda (November 2014), March 2015 (Kenya), September 2015 (Zambia), Rwanda (April 2016). Moreover, a “Partners Meeting” for the RINR has taken place in Kenya (2015). International partners involved in these meetings are Partnership Africa Canada (PAC), Organisation for Economic Co-operation and Development (OECD), ITRI (International Tin Research Institute), African Development Bank, USAID (Tetra Tech). Concerning donor coordination and acquisition of funds, an international donor conference was successfully organized in Berlin in January 2015 where the EU and the bilateral donors (e.g. DFID, SIDA, AFD and BMZ) have participated. Substantial efforts have been made to enhance donor coordination regarding support provided for the ICGLR Conference Secretariat and thus, synergies have been used effectively and duplications avoided. However, against the target of the indicator the project is lagging behind. The module indicator 2 will be partly achieved until the end of 2016.

<sup>1</sup> The indicators that are used to measure the OECD-DAC criteria do not fully adhere to the SMART-criteria; i.e. they are not specific, measurable, achievable, relevant or time-bound. Therefore, the validity of the assessment might be constrained to some extent.<sup>7</sup>

<p>In Rwanda, Burundi und DRC, a total of six RINR instruments have been implemented according to the national implementation plans.</p>	<p>Benchmarking against progress made according to national implementation plans.</p>	<p>The project has promoted the implementation of the RINR and its respective instruments in selected countries in two ways: First, indirectly through support to the Technical Unit (being part of the ICGLR Secretariat), which in turn would support Member States implementation efforts of the individual tools, and second, more directly through promotion of the NCMs in DRC and Burundi, and the Ministry of Natural Resources (MINIRENA) in Rwanda.</p> <p>Whistleblowing Mechanism: The project has successfully developed a set-up and technical specifications, which would support the mechanism. This framework was piloted in DRC's Kivu province. A central area of dispute remains the control over information of reported activity, with DRC expressing unwillingness of the secretariat's primacy of informational control. There is strong evidence that further pilots will equally be marred by problems of data confidentiality if this issue is not solved at the political level.</p> <p>Extractive Industries Transparency Initiative: On a regional level, the project has supported the integration of the artisanal mining sector into EITI, through commissioning a background study. The project works actively with the <i>Ley Mwanawasa</i> Regional Centre in Lusaka, which has, with the project's support, created a regional EITI peer-learning platform.</p> <p>Legal harmonization: Between 2012 and mid-2016, four model laws have been drafted with the help of technical support from the GIZ project. These include the model laws on i) prevention and suppression of sexual violence against women and children, ii) prevention and suppression of illegal exploitation of natural resources, harmonized with the OECD Due Diligence Guidelines, iii) judicial cooperation, and finally iv) non-aggression and mutual defence. In addition, three regional workshops were organized in order to speed up and mutually support the process of domestic harmonization. The project is continuously sensitizing and advising the regional and national authorities on the inclusion of the ICGLR provisions, specifically in Burundi, DRC and Rwanda. However, with regard to the achievements of this indicator, the picture is not entirely clear, in particular for progress made after drafting the model laws.</p> <p>Formalization of Artisanal and Small-scale Mining (ASM): The GIZ project has actively supported a regional capacity building workshop for key ASM actors on formalization of ASM in Eastern and Southern Africa, which was organized in close collaboration with UNESCO and funding by the Swedish Government in 2015. Subsequently, an exchange platform for experts from Governments, the private sector and civil society to share experiences and lessons learnt on formalization of ASM was created. Forty representatives from DRC, Burundi, Rwanda, Uganda, and Sudan participated in three peer-learning events. Database: Preparatory activities (awareness workshops, studies on technical specifications etc.) have been conducted in all three countries. Rwanda, according to its operational RINR plan, apparently seeks to have the database installed during 2016. As is the case with the whistleblowing mechanism however, the central question that remains unaddressed is the flow of information between the member states and the ICGLR Secretariat and control over it. As this is a sensitive strategic and political issue, the influence of the project is expected to remain limited.</p> <p>Regional Certification Mechanism (RCM): While the implementation of the RCM is progressing rather successfully, with certificates now being issued on a mandatory basis for all exports in Ruanda and DRC, the RCM itself remains riddled with questions about its financing, and more concerning, with the overarching question about its added value, especially vis-à-vis prevailing private sector initiatives. So far, a large share of the implementation costs (e.g. on supply chain audit etc.) is financed by industry or donor contributions. This situation is clearly unsustainable and requires practical and financially viable solutions. It is good to see that the project has reacted by setting up a RCM cost analysis, with the aim to provide Member States and the ICGLR Conference Secretariat with reliable information and specific recommendations on RCM implementation cost as a basis for decision-making.</p> <p>To sum up, progress has been made regarding all RINR tools in the three countries but there are delays regarding the national implementation plans. Thus, this indicator is regarded as 'partially achieved'.</p>
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<p>50% of affected national actors (sector ministries, civil society and the private sector in Rwanda, Burundi and the DRC) confirm an improvement of support for the implementation of the RINR through the regional and national structures of the ICGLR</p>	<p>Confirmation of improvement by 50 %</p>	<p>The relationship between Civil Society Organisations (CSOs) and the secretariat is governed by a formalized Memorandum of Understanding (MoU) signed with COSOC/GL. Sector ministries in turn are closely linked through sector ministry focal points, which collaborate with the National Coordination Mechanism, mostly based in the ministries of foreign affairs. On a direct level, the project undertook substantial efforts to foster the efficiency of civil society within the RINR process, and increased its collaboration, specifically with CSO networks in the Kivu region. Trainings, outreach, workshops and advocacy measures are largely aimed at creating CSO networks, which understand sector issues and thus can act as eyes and ears in the Kivu region. All CSO members interviewed regarded the project's contribution as effective, efficient and valuable. This was also true for the case of the National Coordinator of Rwanda. However, with regard to their relationship with the regional and/or national structures, assessments (i.e. opinions) were mixed at best and some actors exclaimed more of disapproval for these structures. Moreover, synthesizing the content from a variety of interviews, it seems that the involvement of the private sector is still rather weak, and exchanges are kept to a minimum. From the point of view of industry itself, the evaluation team had the impression that the level of approval of ICGLR's actions is also rather limited. Only a limited sample of 'affected national actors' has been analysed but based on the data overall there are indications that the indicator has not been achieved.</p>
<p>The Secretariat represents the RINR in at least 3 international fora and private sector initiatives.</p>	<p>Representation of the RINR in 3 international fora</p>	<p>The project has promoted international positioning by way of technical and financial support. In 2015 alone, this support enabled the Secretariat to participate as member of the International Contact Group for the African Great Lakes in Berlin, Germany; to participate in the joint ICGLR and European External Action Service (EEAS) meeting of the International Task Force on Illegal Exploitation of and Trade in Natural Resources in the Great Lakes Region (ITF) in Brussels, and at the United Nations Security Council Committee 1533 (The DRC Sanctions Committee) in New York. With regard to promoting the visibility of the Secretariat at private sector forums, the project successfully coordinated with both the OECD and industry to enable the Secretariat to co-organize, together with the OECD and the UNGoE, the 9th ICGLR-OECD-UN Group of Experts Forum on Responsible Mineral Supply Chains, taking place in Paris. An ICGLR delegation attended this event. Furthermore, with support of the project, the Technical Unit reached out, and provided input to other important international industry coordination efforts to promote due diligence. As an important result of these efforts, representatives of the Conflict Free Smelter Initiative now serve as international industry representatives on the ICGLR Audit Committee, and have agreed to train the Audit Committee members on audit methodology. To prepare for a stronger inclusion of the gold sector, contacts were made to the Dubai Multi Commodity Centre (DMCC), which is the key regulatory agency of one of the most important gold hubs for African gold.</p>
<p>The Guidelines for Gender Mainstreaming Gender Responsive Strategies developed by the ICGLR Secretariat are integrated into three national legislation processes.</p>	<p>Gender issues are integrated into 3 national legislation processes</p>	<p>In 2012, an external consultant developed "Guidelines for Mainstreaming Gender in the Minerals Sector". The project has supported several activities for the National Coordination Mechanisms in DRC and Burundi: The former pushed for closer integration of the gender guidelines through the recruitment of a gender expert. A key output of this increased effort was the launch of a lobbying strategy within the government that incorporates the gender mainstreaming perspectives into the current draft mining code, which is as of mid-2016 still under review. In Burundi, a number of consultative processes were conducted throughout 2014 and 2015 with the overall objective of developing a common political strategy for gender mainstreaming in the mining sector. Rwanda is on track to harmonize its mining laws with an integrated gender perspective throughout 2016. As such, this indicator is partially fulfilled.</p>

**The evaluation team comes to the conclusion that objectives indicator 1 and 5 will probably be fully and the other objective indicators (2, 3, 4 and 6) will be partly achieved by the end of the project/programme.**

With regard to possible unintended negative consequences of the project, the evaluation team found that support of the TU has created a high degree of dependence. This in a way also holds true for the Secretariat as a whole, where risks of

dependence are specifically prevailing regarding organizational support (for further details see chapter on the OECD DAC criteria ‘sustainability’). The ICGLR project has so far noted this unintended result the strategy of diversifying the partner structure has not yet come to fruition.

The effectiveness of the TC measure is rated successful with a total of 12 points.

**Overarching development results (impact)** (Are we contributing to the achievement of overarching development results?)

The objective of the project is to promote regional collaborative efforts around complex issues (the RINR, or illicit mineral trade), which affect different Member States in a very different manner, given the often highly challenging level of governance and other political issues within their boundaries of jurisdiction. Consequently, the impact that the project can achieve is expected to be less tangible, but nevertheless substantial, important and indeed long-term for overall development efforts in the region. Its primary path of impact is through improving the efficiency of the Secretariat, which in turn will affect the regional and national RINR implementation structures, with the overall effect of improving regional collaboration and management on mineral exploitation and trade. In certain cases, the project has made headway, as the basis for RINR implementation undoubtedly has been laid in the member states, including the three focus countries of the project. Again, while attribution again might sometimes not be direct, the project nevertheless plays an important role. As such, with its various ways and methods of helping to promote RINR implementation in Member States, and by promoting the positioning of the ICGLR and the certification mechanism in the global arena including connecting it with international due diligence structures, the long-term impact is likely to take shape of increased legalized, formalized and accountable exports of minerals. This, in turn will positively influence the population that directly and indirectly lives of mining activities as a source of income. Concerning the assessment dimension of broad impact the project has not yet found a mechanism for scaling up lessons learned in facilitating the RINR.

The impact of the TC measure is rated rather successful with a total of 11 points.

**Efficiency** (Are the objectives being achieved cost-effectively?)

Given the project’s components of organizational development, as well as support of the RINR on both the regional and national levels, the above mentioned activities require a substantial degree of flexibility. Activities and instruments include the use of short term experts to support organizational development as well as to support the National Coordination Mechanism in the DRC, activities such as staff trainings, salaries for two staff positions at the Technical Unit (the coordinator and the technical expert on certification through grants directed to the Secretariat), the placement of an development worker, as well as the use of the project’s own long-term experts for advisory services. Further positions such as the expert on auditing have been filled with financial support from partners, and funds for the recruitment of the whistleblowing expert and the data base officer have been pledged by partners and will be hired in 2016. Furthermore, as in the previous implementation terms the ICGLR Secretariat has been provided with substantial financial support for its running costs. In general, the level of cooperation with other bilateral and multilateral donors is quite strong. The project repeatedly secured co-financing of other development partners and maintains regular dialogue and roundtables with them. On other occasions, the evaluation team found that the project’s privileged role as lead donor to the ICGLR has not been exploited as well as it could have been, in order to align donors’ efforts behind a common goal (e.g. finding a common ground around key guiding strategy papers).

The efficiency of the TC measure is rated successful with a total of 12 points.

**Sustainability** (Are the positive results durable?)

The project is currently completing its third phase, with the original beginning of the first project phase taking place in 2004. Since then a number of crucial successes were achieved, despite the often delicate political terrain that had to be navigated. Despite these efforts, some critical questions yet remain open or unaddressed. Primarily, the structure of the Secretariat and indeed the organization as a whole remains heavily dependent on external financial support. Contribution of Member States allegedly is limited towards four Members States, and sometimes contributions are not forthcoming regularly. Despite prolonged efforts and exchanges, the ICGLR Secretariat and the donor community so far have not been able to find sustainable mechanisms of self-financing. While this is true for the organization at large as well as its Secretariat, this fact holds also for the RINR and its components. The most critical of these is surely the RCM, the backbone of which depends upon cost-intensive third party audits and other forms of verification. Here too, how the burden will be shared between exporting Member States and the private sector is not yet settled. This is all the more concerning as the RCM, as the core of the RINR and all efforts to curb illegal trade in minerals, would be best placed to convince Members States of the positive

effects of the ICGLR coordination mechanisms and thus of its membership. In addition, other critical issues like the continuation of externally funded key staff, the maintenance of exchanges/peer learning and facilitation platforms, as well as various regional trips of Secretariat's staff are not yet accounted for when it comes to sustainability. As such, despite the efforts of the project to coordinate closely with the international donor community, there is a persistent risk that the positive results and effects that the project has so far managed to bring forward will be not sustainable in the end.

The sustainability of the TC measure is rated rather unsatisfactory with a total of 8 points.

**Published by**

Deutsche Gesellschaft für  
Internationale Zusammenarbeit (GIZ) GmbH

Registered offices  
Bonn and Eschborn

Friedrich-Ebert-Allee 40  
53113 Bonn, Germany  
T +49 228 44 60 0  
F +49 228 44 60 1766

Dag-Hammarskjöld-Weg 1–5  
65760 Eschborn, Germany  
T +49 61 96 79 0  
F +49 61 96 79 1115

E [info@giz.de](mailto:info@giz.de)  
I [www.giz.de](http://www.giz.de)