

Annex E: Evaluation Audit Trail

To the comments received in October 2025 from the “IOMC Toolbox for decision making in chemicals management – Phase IV: Towards achieving the SDGs” Project Management Group and Participating Organizations

The following comments were provided in track changes to the draft evaluation report; they are referenced by author (“Author” column) and track change comment number (“#” column):

Author	#	Para No./ comment location	Comment/Feedback on the draft evaluation report	Evaluator response and actions taken
Anonymous (Guest)	1	Executive Summary	About countries requesting the same support, key finding 1: “This will always be the case and is not surprising at all. Even with the toolbox, they will need help. That is why most of the project is about providing the help. That will allow us to refine our tools and update the Toolbox accordingly. I don’t see this as an implementation crisis, but a natural situation”	Comment well received. This finding has been deleted.
Anonymous (Guest)	2	Executive Summary	About complementarity with GFC’s targets, key finding 4 “this is an inappropriate statement given that Toolbox pre-dates GFC. This is further inappropriate because there are 8 management schemes and more in development that are implementation pathways for the sound management of chemicals. We will not know how successful GFC implementation and accountability mechanisms are until 2030. Toolbox lacks GFC terminology is the only factual statement, since Toolbox predates GFC.”	We have clarified that the GFC and the opportunity that it presents emerged during Phase IV. Therefore we think that pointing out this opportunity is within the scope of the MTE. We acknowledge that the PMG has already begun responding. The phrase “mechanisms the IOMC Toolbox has lacked” has been rephrased.
Anonymous (Guest)	3	Executive Summary	About targeted participants, key finding 5: “it is unclear where this number comes from. Does it reflect the number who received training in the first reporting period? Training is only one out of five Outputs of Phase 4. It does not reflect the number of users of the platform.”	The number was extracted from the interim narrative report. However, for consistency, it was replaced by the number of participants received through lists of participants from the POs (229). Indeed, this number does not reflect the number of users on the platform, which is discussed later in the report.
Anonymous (Guest)	4	Executive Summary,	this does not reflect the fact that all partners need to submit financial reports in a timely manner according to the requirements of the Contribution Agreement, consistent with	Well noted. Text adjusted (both in the Executive Summary and the main report) to also require quality assurance by

		recommendation 2	their allocated budget lines, co-financing requirements, in USD using the fixed project exchange rate, and other inconsistencies. Nearly all partners needed to re-submit their certified reports, due to inconsistencies and noncompliance with donor expenditure and/or reporting requirements. The text should also reflect: Ensure partners submit certified reports consistent with donor expenditure and reporting requirements.	POs, ensuring alignment with donor expenditure and reporting requirements.
Anonymous (Guest)	5	Executive Summary, recommendation 3	GFC is not within the scope or budget of the Phase 4 Contribution Agreement. This should not be a recommendation for Phase 4.	Agreed. However, the MTE found an opportunity to align the IOMC Toolbox work to the GFC, should the PMG continue working on this direction, as started when doing the mapping exercise.
Anonymous (Guest)	6	Executive Summary, recommendation 4	This would not be possible with this kind of budget, unless it all goes to one organisation with one project	Well taken, this recommendation is deleted.
Anonymous (Guest)	7	Executive Summary, recommendation 5	This is not within the scope or budget of the Phase 4 Contribution Agreement. This should not be a recommendation for Phase 4. It is further premature to implement an AI feature that has not been developed, tested or piloted first.	Recommendation rephrased to “possibly exploring the potential of conversational interfaces using AI chatbots”. The recommendation focuses on improving user’s experience in the platform. Other strategies different than chatbots could be explored.
Anonymous (Guest)	8	Executive Summary, lesson learned 4	This is an inappropriate Recommendation. GFC was not established until Sept 2023 and we will not know if the proposed GFC implementation and accountability structure is effective until 2030. It is conflicting to say Toolbox should be integrated into GFC when GFC already exists (and Toolbox is mentioned in GFC). GFC is too young to be considered "established" and GFC has yet to demonstrate implementation let alone success.	<p>The lesson section has been reworked to focus on embedding in general versus standalone efforts. That said I think it is ok to talk about integration in practice when it comes to the GFC</p> <p>New lesson: “Embedding Over Standalone: Carrying out Toolbox activities within project, country and global processes is more likely to contribute to behaviour change because what is learned is more likely to be revisited and used when carried out in ongoing processes. The evaluation reveals a project with sound technical content and clear relevance to global needs, but with fundamental structural problems that threaten effectiveness and</p>

				sustainability. The GFC presents a critical opportunity for strategic repositioning, but success requires immediate administrative reforms and long-term architectural redesign”
Anonymous (Guest)	9	Executive Summary	On countries requesting the same support: “this does not consider the rapidly evolving nature of chemicals management and the necessary new tools and training needed to keep up to date. chemicals management requires lifelong learning”	The finding about repeating similar capacity building has been deleted
Anonymous (Guest)	10	Executive Summary, recommendation 5	Experience with other platforms (e.g. SAICM knowledge platform) shows that this a nice to have, but does not much for user engagement	The recommendation has been rephrased. See above.
Haosong Jiao	11	Executive Summary, Lesson learned 1	While tools can help reduce the need for repetitive capacity-building activities, they do not eliminate the need for all forms of capacity building. To assert that tools do not reduce the demand for capacity building, one must provide evidence that training sessions or other capacity-building efforts covering the same content already embedded in the tools are still being conducted.	The lesson has been reformulated to focus on the value of training alone without organizational prioritization.
Valérie Frison	12	Executive Summary, finding 1	<p>Implementation crisis is a strong wording.</p> <p>In the paragraph there are several assumptions that and not proven:</p> <p>Given the number of countries needing to set up or continuously improve their chemicals management system, the capacity building brought through this project is a drop in the ocean of the help needed</p> <p>Personally I don't see countries requesting exactly the same capacity building over and over, there is an evolution in the help needed as they go through the process of setting-up and improving their chemicals management system</p> <p>Countries are at different stages of their chemicals management system development and new countries start</p>	<p>The phrase “implementation crisis” has been replaced by “undermined by administrative problems”</p> <p>Points well taken. The finding on “continued request of capacity building by countries” has been deleted.</p>

			<p>their journey of implementing chemicals management successively</p> <p>Setting up, improving and implementing a chemicals management system is resource intensive for governments and this project provides knowledge but no funding to do the work.</p> <p>In addition this process takes several years</p> <p>This process is therefore dependent on the countries' priorities that may change, go and come back</p> <p>The ongoing demand as stated in the paragraph reflects the need for tailor-made capacity building, the iomc toolbox is used as a first step to understand the different management systems. The addition of country case studies that has started in the industrial chemicals MS and will be developed in other MS will bring concrete examples</p>	
Valérie Frison	13	Executive Summary, key finding 2	My understanding is that they will step aside for the next phase. The phrasing here is not clear and give the impression that WHO is stepping aside in the middle of phase 4	Indeed. The text has been amended to: "WHO has notified POs that it would be stepping aside as the Administering Organization (AO) after Phase IV"
Valérie Frison	14	Executive Summary, key finding 3	<p>The activities mentioned are naturally sequential.</p> <p>It is normal to have first the work on the MS and then work on the tools, then the translations and the training in the end on the new content.</p> <p>The workplan is indicative and adapted with the context, there is no bounding percentage of activity completion at mid-term.</p>	Point well taken. A sentence has been added to make the sequential point. It is understood that workplans are indicative
Valérie Frison	15	Executive Summary, key finding 3	Because of the technology used for the webpage, there are only 5 pages in the IOMC Toolbox:	Agreed. The paragraph has been amended to reflect on the number of active users despite small number of promotional events.

			<p>Homepage</p> <p>Navigation page that is one and the same for all the MS and sub topics</p> <p>Help page</p> <p>News page</p> <p>Contact page</p> <p>It is normal to have most users going to one or 2 pages</p> <p>The returning users is not very reliable as users are counted as new users when they change navigator, when they refuse cookies or when they use a incognito/private navigation page</p> <p>On the bright side, we could welcome the high number of new users discovering the IOMC Toolbox, especially given the little promotional events done lately.</p>	
Valérie Frison	16	Executive Summary, key finding 4	<p>This is outside the scope of the description of the action. The GFC is not mentioned once.</p> <p>However, it has been agreed to add GFC text/wording and context throughout the Toolbox.</p> <p>This will be done along with the review and revision of the content</p>	Well noted. The text has been changed to clarify that the GFC is an opportunity that has emerged in Phase IV which the PMG has engaged with through a mapping exercise, described in more detail in the main body of the report
Valérie Frison	17	Executive Summary, key finding 5	<p>Same comment, I'm surprised by these numbers, I doubt we targeted this many countries with the events organised since 2023</p>	See comment above. The number has been adjusted to 229.

			The scope of this evaluation should be from 1st January 2023 until September 2025 as mentioned at the beginning of the document.	
Valérie Frison	18	Executive Summary, key finding 5	Deep institutional change is very dependent on the resources available in the country for the implementation, which is not provided by this project	Changed to “meaningful outcomes” which are then defined by the examples
Valérie Frison	19	Executive Summary, recommendation 3	Agreed, the GFC is not mentioned in the DoA. Some effort will be put at no cost to meet this recommendation but this should not be evaluated as it is NOT in the promised outputs.	Well noted. The recommendation has been rephrased to reflect on the opportunity offered by the GFC. See response above.
Valérie Frison	20	Executive Summary, recommendation 4	<p>Agreed the budget amount is not allowing this kind of strategy.</p> <p>If we decide to go for this kind of strategy it would mean helping 2-5 countries maximum and as mentioned earlier, the impact is very depending on the countries’ resources and priorities. They often have very limited staff making it very difficult to keep the countries’ engagement for a long period of time. Also the risk would be very high as the timing has been proven very crucial as governments and priorities change. I personally believe this kind of strategy would be achievable only with a GEF kind of amount of budget and for a much longer phase period allowing to start the project when the selected country is ready which does not necessarily coincide with the others and the beginning of the project.</p> <p>This recommendation is not applicable for the remainder of phase 4 and thus should not appear here.</p>	The recommendation has been deleted.
Valérie Frison	21	Executive Summary, recommendation 5	<p>Agreed this should not be a recommendation for the remainder of phase 4.</p> <p>It is out of scope.</p> <p>In addition, the environmental cost of having AI might not be balanced with improved user experience. First because AI</p>	The recommendation has been rephrased to refer to AI as a possible exploration. See above.

			<p>chatbots are not reliable and the content delivered would then not be strictly IOMC guidance but could be polluted by industry information/recommendations or worse invented/hallucinated content.</p> <p>If user wants to use AI they can go to chatbots available online.</p> <p>The added value of the IOMC Toolbox is to have approved consensus documentation from IOMC organisations.</p>	
Valérie Frison	22	Executive Summary, recommendation 6	Please clarify I'm personally not proficient in this matter and don't understand how to do better on gender equality and human rights strategy in chemicals management capacity building	<p>The recommendation has been reworked to provide more practical insights into implementation:</p> <p>“Carry Out One or Two Targeted Low Cost Interventions that Establish Gender Awareness as a Quality Improvement Rather than an Add-On: While Phase IV shows improvement over Phase III, current efforts remain fragmented, unsystematic, and insufficient to meet contemporary standards for inclusive development programming. Given time and resources available in the second half of Phase IV of the project what it can do is to take one or two examples of where there is active exclusion to understand the barriers and how they could be overcome. The project could also explore if and where gender-blind language creates problems in two or three of the most used management toolkits and make targeted revisions as a pilot for doing this more widely.”</p>
Valérie Frison	23	Box 1, tools -> usage chain	The objective of this project is not to have a tool that replace tailor made capacity building. The IOMC Toolbox is the support and the information source for the capacity building	Agreed. The finding was deleted.
Valérie Frison	24	Box 1, training -> implementation change	Because there are many other factors that are not in the hands of this project such as prioritization and resource availability	Agreed. This point was added.
Valérie Frison	25	Box 1, multiagency collaboration -> project sustainability	I disagree with this statement which is not an assumption made within this project. The multi agency collaboration is because many topics overlap I however agree with the vulnerability part.	Well taken. The paragraph has been rephrased to reflect this.

Valérie Frison	26	Box 1, supply side fallacy	<p>The IOMC Toolbox is the support and the information source for the capacity building.</p> <p>The objective is not to replace tailor-made capacity building</p>	Well noted. This point has been deleted.
Valérie Frison	27	Box 2, strategic positioning	Well noted, it has been offered to make some changes at no cost although it is not part of the DoA	Noted. The reference to the mapping already undertaken was added.
Valérie Frison	28	Box 2, addressing the ToC crisis	Is it really the same countries asking the same things? Where is it seen?	This section has been deleted.
Valérie Frison	29	Box 2, ongoing engagement	I don't see where in the application form to the GFC fund it would be relevant to mention the IOMC Toolbox. The text length is very restrictive and does not allow including tools or source of guidance	Well noted. The sentence has been complemented with: possibly because of length restrictions on the application form.
Valérie Frison	30	Box 2, addressing administrative challenges	<p>Not applicable for the remainder of the phase 4</p> <p>to my understanding WHO is not withdrawing from the secretariat role of the IOMC Toolbox project phase 4</p>	This section has been deleted.
Valérie Frison	31	Box 3, August 2024	In the end 50K were transferred	Well noted. Change made.
Valérie Frison	32	Box 3, technical crisis	Became 50K	Change made.
Valérie Frison	33	Finding 1	Not in Phase 4 DoA	Well noted. It has been slightly rephrased to reflect this is a potential opportunity given the initial mapping work undertaken.
Valérie Frison	34	Par. 61	<p>To my knowledge countries have not requested similar capacity building at separate moments. If capacity building was provided at different timings to the same country, the topic or depth of the implementation process had evolved.</p> <p>However, countries do request similar capacity building to several IGOs (and countries providing CB) at the same time, hoping some budget is available somewhere which is why a global capacity building coordination group will be set up</p>	The overarching findings has been deleted. I have also clarified that the similar requests are requests for training and improved capacity rather than in support of sound management and the institutional, financial and political barriers that prevents this transition

Valérie Frison	35	Par. 80	Same comment as above	The finding has been deleted.
Valérie Frison	36	Finding 7	<p>Because of the technology used for the webpage, there are only 5 pages in the IOMC Toolbox:</p> <ul style="list-style-type: none"> · Homepage · Navigation page that is one and the same for all the MS and sub topics · Help page · News page · Contact page <p>It is normal to have most users going to one or 2 pages</p> <p>The returning users is not very reliable as users are counted as new users when they change navigator, when they refuse cookies or when they use a incognito/private navigation page</p> <p>On the bright side, we could welcome the high number of new users discovering the IOMC Toolbox, especially given the little promotional events done lately</p>	Well noted. The finding has been adjusted.
Valérie Frison	37	Par. 98	50K, to be corrected	Adjusted.
Valérie Frison	38	Par. 118	<p>To my knowledge countries have not requested similar capacity building at separate moments. If capacity building was provided at different timings to the same country, the topic or depth of the implementation process had evolved.</p> <p>However countries do request similar capacity building to several IGOs (and countries providing CB) at the same time,</p>	This paragraph has been deleted.

			hoping some budget is available somewhere which is why a global capacity building coordination group will be set up	
Valérie Frison	39	Par. 125	<p>The activities mentioned are naturally sequential. It is normal to have first the work on the MS and then work on the tools, then the translations and the training in the end on the new content.</p> <p>The workplan is indicative and adapted with the context, there is no bounding percentage of activity completion at mid-term</p>	A sentence has been added to make this point: "Shortfalls can be expected on outputs that depend on previous work, for example translations"
Valérie Frison	40	Par. 126	<p>Because of the technology used for the webpage, there are only 5 pages in the IOMC Toolbox:</p> <ul style="list-style-type: none"> · Homepage · Navigation page that is one and the same for all the MS and sub topics · Help page · News page · Contact page <p>It is normal to have most users going to one or 2 pages</p> <p>The returning users is not very reliable as users are counted as new users when they change navigator, when they refuse cookies or when they use a incognito/private navigation page</p> <p>On the bright side, we could welcome the high number of new users discovering the IOMC Toolbox, especially given the little promotional events done lately</p>	Well noted. The finding has been adjusted.

Valérie Frison	41	Recommendation 3	No budget available for this	Noted. This has been rephrased to refer to exploration.
Valérie Frison	42	Recommendation 4	This requires much more funding than what is usually planned for capacity building events	Recommendation 4 has been deleted
Valérie Frison	43	Recommendation 5	<p>Because of the technology used for the webpage, there are only 5 pages in the IOMC Toolbox:</p> <ul style="list-style-type: none"> · Homepage · Navigation page that is one and the same for all the MS and sub topics · Help page · News page · Contact page <p>It is normal to have most users going to one or 2 pages</p> <p>The returning users is not very reliable as users are counted as new users when they change navigator, when they refuse cookies or when they use a incognito/private navigation page</p> <p>On the bright side, we could welcome the high number of new users discovering the IOMC Toolbox, especially given the little promotional events done lately</p>	Well noted. The recommendation has been adjusted.
Valérie Frison	44	Recommendation 5	<p>AI should not be a recommendation for the remainder of phase 4.</p> <p>It is out of scope.</p> <p>In addition, the environmental cost of having AI might not be balanced with improved user experience. First because AI chatbots are not reliable and the content delivered would then</p>	The text was adjusted to refer to include different options

			<p>not be strictly IOMC guidance but could be polluted by industry information/recommendations or worse invented/hallucinated content.</p> <p>If user wants to use AI they can go to chatbots available online.</p> <p>The added value of the IOMC Toolbox is to have approved consensus documentation from IOMC organisations</p>	
Valérie Frison	45	Lesson 1	The objective of this project is not to have a tool that replace tailor made capacity building. The IOMC Toolbox is the support and the information source for the capacity building	The lesson has been adjusted.
Valérie Frison	46	Lesson 3	This is already in the mind of Pos and taken into account, it is not possible to organise capacity building with a country that is not requesting it, they do not have the time and resource to spend on this if not in their priority. There is however a volatility in the priority changing in countries (unexpected event, government change, resource shortage...)	The lesson has been reframed around policy windows
Jorge Ocaña	47	Executive Summary, key finding 1	Capacity building is a long process, additionally, the number or countries targeted is limited in each phase of the toolbox.	The key finding has been reworked.
Jorge Ocaña	48	Executive Summary, key finding 2	The question has not been posed as such, as Phase V is not part of the evaluation. I suggest to delete this phrase as the IOMC should consult on which organization is ready to coordinate. I have not seen such a question or topic in the IOMC sessions	The phrase is deleted
Jorge Ocaña	49	Executive Summary, key finding 3	Agree with previous comment, it is not an appropriate to say that the Toolbox lacks of..., I am not sure what is meant by implementation pathways, as the previous paras highlights good progress (an even but overall good progress).	See response above.
Jorge Ocaña	50	Executive Summary, recommendation 2	An early review from the Coordinating PO should avoid many comments from WHO finances. I think the coordinator has to ensure the reports from POs are consistent the the EU requirements and work with the POs to improve reporting. If so, the chances that WHO finances rejects the POs reports is much lower	Noted. This idea has been added in the text.

Jorge Ocaña	51	Executive Summary, recommendation 3	The Toolbox is available all time, not only during Toolbox project implementation phase, in that sense countries can always use the Toolbox when implementing projects, so the timing issue is less relevant at this stage	Well noted. No change made.
Jorge Ocaña	52	Executive Summary, recommendation 4	This is something that should be carefully mentioned. From Toolbox distribution to implementation support means working on an implementation plan in countries. This is linked with existing resources and how countries coordinate national activities and sectors, in which the toolbox cannot help. National coordination is important to consider, same for resources available to be used in a coordinated and collaborative manner. This is clearly beyond the Toolbox work we do.	This recommendation was deleted.
Jorge Ocaña	53	Executive Summary, lesson learned 1	This is correct, but the reduction or impact is seen overtime and with a comprehensive package to countries, follow-up on trainings. As an example, the Stockholm Convention, the PCB inventories has developed capacity in countries but still needs (now to a lower extent) support from international experts. Capacity building is a task that last many years, so the assumption is correct but the demand for capacity building will decrease over time.	The Lessons have been reworked and ToC Validity is no longer mentioned
Jorge Ocaña	54	Par 41., limitation	This is by no means representative. I think calling the teams would have been an alternative approach.	Agreed. This is what we have done before, with higher success rate. The sentence was deleted.
Jorge Ocaña	55	Box 2, addressing the TOC crisis	Can we know how do we know that countries continue requesting the same support?, if the surveys had a low response rate, how we got this information?, what does it mean "same support"?, same topics?, same platform, please clarify	This section was deleted.
Jorge Ocaña	56	Box 2, ongoing engagement	And this was done in 2024, there is a report available, if I remember well	Noted. The finding has been rephrased.
Jorge Ocaña	57	Box 2, addressing administrative challenges	In reference to the expression "The GFC transition": I am not sure what this means.	This section has been deleted.
Jorge Ocaña	58	Box 2, addressing administrative challenges	I am not sure what this paragraph means. The Phase IV of the Toolbox is underway, no redesign possible. We cannot confuse the GFC Secretariat role and the IOMC Toolbox management, this is totally wrong. The Toolbox can complement the GFC and vice versa, not more no less.	This section has been deleted.

			A Secretariat cannot provide administrative functions to a project.	
Jorge Ocaña	59	Box 3, technical crisis	When in 2024?	The month was added.
Jorge Ocaña	60	Box 3, some programmatic success	This does not sound positive...what is some outputs compared with the required outputs? Can we be more positive, as admin challenges were severe and I think the efforts made were more than "some outputs". Funding arrived to agencies just came in October 2023, meaning Pos worked with no EU funding available but with their own resources, I think this is remarkable. Footnote 19 missing.	The sentence was rephrased.