PROJECT INDEPENDENT EVALUATION – MANAGEMENT RESPONSE

(Note: This form is to be included in the final report)

Name of programme/office/unit:	Project Management Group (PMG) of the IOMC (Inter-Organisation Programme for the Sound Management of Chemicals) Toolbox for Decision Making in Chemicals Management – Phase IV
Name of programme manager and title:	Virunya Bhat For the PMG
Name of project undertaking:	IOMC Toolbox for decision making in chemicals management – Phase IV: Towards achieving the SDGs Project ID N/A
Donor:	European Union
Name of evaluation:	Midterm evaluation of the IOMC Toolbox for decision making in chemicals management – Phase IV: Towards achieving the SDGs
Evaluation Report issuance date:	October 2025

SECTION I – MANAGEMENT COMMENTS ON FINDINGS / CONCLUSSIONS
The Phase 4 Project Management Group acknowledges the evaluation's analysis and appreciates the constructive recommendations provided. However, two of the five Recommendations (#3 and 4) are outside the scope of the current Contribution Agreement Description of the Action and Budget. We have taken steps to address feasible improvements, including submitting a no-cost extension request and reinforcing clarity on financial reporting responsibilities. Strategic realignment with the Global Framework on Chemicals and major IT enhancements were deemed beyond the current mandate and resources, but gender considerations are being strengthened through targeted tagging and content updates. Overall, the evaluation has informed actions that will enhance project delivery within existing commitments.

SECTION II – EVALUATION RECOMMENDATIONS

Management Response to Recommendations and Planned Action

Recommendation	Management Response (Accepted, Partially Accepted or Rejected)	Management response comments	Planned action					
			Key action (s)	Responsible	Timeframe (to be implemented by)	Information Source (link, document or any other evidence for future verification of planned actions)	Budget allocated (if necessary, otherwise specify "n/a")	Status at the time of completing the MR (planned or under implementation)
Recommendation 1: Secure No-Cost Extension Through Emergency Provisions. The administrative agent must urgently submit the extension request that the European Commission may accept without awaiting the consolidated financial report, invoking exceptional circumstances provisions if necessary to ensure a no-cost extension	Partially accepted.	We are not aware of "emergency provisions" under the EC Contribution Agreement. We will submit the NCE according to Article 10 of the Contribution Agreement.	The amendment request for a no-cost extension will be submitted by 30 November 2025, consistent with the EC Contribution Agreement Article 10 requiring at least 30 days prior to the end of the Action on 31 December 2025.	WHO as the Administering Organization	30 November 2025	Acknowledgement of receipt of the request by the EC.	No additional resources	Under implementation
Recommendation 2 Address Administrative Bottlenecks for Phase IV. Ensure processes are more streamlined and address administrative bottlenecks. The current structure has created rather than solved administrative complexity, requiring fundamental rethinking of the structure before any future phase. A practical suggestion is for Participating Organizations (PO) to ensure reports align with donor expenditure and reporting requirements prior to submission and for the Administering Organization to vet PO financial reports more closely for compliance with donor requirements before submitting them to World Health Organization Finance.	Partially accepted.	We agree that the current financial reporting structure requires fundamental rethinking before any future phase. We disagree that it is a "practical suggestion" for Participating Organizations (PO) to ensure reports align with donor expenditure and reporting requirements prior to submission. We assert that it is the responsibility of the PO (not merely a practical suggestion). On the contrary, it may be a practical suggestion, rather than the responsibility, for the Administering Organization to vet PO financial reports for compliance to donor **reporting** requirements prior to submission. However, the Administering Organization is not responsible for ensuring that expenditures themselves comply, because it is the responsibility of the PO to ensure that their expenditures comply.	POs are responsible for ensuring that their expenditures and their reporting of such comply with donor requirements. The Administering Organization can review draft financial reports for their compliance to reporting requirements, if submitted to the Administering Organization prior to finalization.	POs as implementation partners and WHO as the Administering Organization	When POs submit second interim financial reports and final financial reports to Administering Organization	Second interim financial reports and final financial reports	No additional resources	Planned
Recommendation 3 Achieve strategic realignment with Global	Diagree	The current Phase IV Contribution Agreement was executed in 2022 prior to the adoption of the GFC. Thus, GFC is not explicitly	Not applicable (NA)	NA	NA	NA	NA	NA

Recommendation	Response	Comments		Responsible	Timeline		Resources	Status
Framework on Chemicals. Should the PMG wish to go beyond mapping Toolbox content onto Global Framework on Chemicals (GFC) targets in Phase IV then the project should consider creating explicit entry points that position the IOMC Toolbox as essential infrastructure for GFC Programme One on national legislation and institutional capacity building.		mentioned or included in the Annex I Description of the Action or Annex III Budget. The PMG as a whole cannot implement this recommendation without explicit willingness from each PO and subsequent formal request to the donor and agreement from the donor to amend the Description of the Action, and potentially the Budget, via an Amendment to the Contribution Agreement. Individual POs can "wish to go" beyond and outside the scope of the Contribution Agreement at their discretion but must prioritize their obligations under the Contribution Agreement.						
Recommendation 4 Improve user experience. Redesign platform functionality to address shallow engagement patterns through simplified navigation, contextualized content presentation, and interactive support mechanisms, possibly exploring the potential of conversational interfaces using Artificial Intelligence (AI) chatbots.	Disagree	This is outside the scope of the current Phase IV Contribution Agreement Annex I Description of the Action (DoA) and Annex III Budget. The shallow engagement patterns are due to the way Google analytics' metrics relying on cookies often rejected by users. The navigation has already been greatly simplified in the last developments, reducing the number of clicks to access the data. No budget was allocated to IT development for Phase 4 and no output was promised in the DoA. Exceptionally, extra budget was shifted to IT development to fix security and back-office issues and to make the more information pages more visible. This activity was not planned in the DoA and was added to the deliverables without removing anything. 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 not be strictly IOMC guidance but could be polluted by industry information/recommendations or worse invented/hallucinated content. If user wants to use AI they can go to chatbots available online. The added value of the IOMC Toolbox is to have approved consensus documentation from IOMC organisations.	Not applicable (NA)	NA	NA	NA	NA	NA
Recommendation 5 Carry Out One or Two Targeted Low Cost Interventions that Establish Gender	Partially accepted	Gender balance is taken into consideration when organizing face-to-face meetings as part of the normal procedure by the organization.	Tools relevant to gender and vulnerable populations considerations will be identified and added to the	OECD and POs	Q2 2026	Search IOMC Toolbox site for gender and	No additional resources	Under implementation

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.		Tools relevant to gender and vulnerable populations exist in the Toolbox but may not be easily identified without tags.	IOMC Toolbox where appropriate. For example, - A tag will be created to allow filtering directly the content mentioning gender, vulnerable populations and human rights in the advanced search. - In the Industrial Chemicals Management Scheme's exposure element, a sentence will be added about this issue and tools on exposure assessments for children and pregnant women will be added. - The Public Health Management of Chemicals Scheme includes resources, such as the WHO Chemicals Road Map, which promotes the collection of data disaggregated by gender, to promote gender-responsive and inclusive national actions to manage chemicals, waste and pollution.			vulnerable populations #tags		

Name Programme Manager on behalf of PMG	Date	Signature
Virunya Bhat		

			Management Response to Recommendations and Planned Action Follow- up
Recommendation			**Planned action**

	Management Response (Accepted, Partially Accepted or Rejected)	Management response comments	Key action (s)	Status 6 months (planned, under implementation, implemented)	Comments	Status one year (planned, under implementation, implemented)	Comments
	This column will be completed by PPME	This column will be completed by PPME	This column will be completed by PPME	This column will be completed after six months only	Write in this column any comments explaining, giving context or details on the actual status of the planned action	This column will be completed after one year only	Write in this column any comments explaining, giving context or details on the actual status of the planned action
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Recommendation 5 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.							

Name of Programme Manager on behalf of PMG	Date	Signature