
Independent Evaluation of TradeMark East Africa

Deliverable 3B: Performance Evaluation

Final Report

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List of abbreviations

AEO	Authorised Economic Operator
AfDB	African Development Bank
AI	Appreciative Inquiry (an evaluation method)
AVE	Ad valorem equivalents
CBA	Cost-benefit analysis
CBTs	Cross-border traders
CC	Country Component Lead
CCTTFA	Central Corridor Transit Transport Facilitation Agency
CD	Country Director
CEPGL	Communauté Economique des Pays des Grands Lacs'
CEPII	Centre d'Études Prospectives et d'Informations Internationales
CET	Common External Tariff
CFTA	Continental Free Trade Area
CGE	Computable general equilibrium – economic model
CL	Country Leadership
CMP	Common Market Protocol
COMESA	The Common Market for Eastern and Southern Africa
COO	Certificate of Origin
CSO	Civil Society Organisation
CT	Contribution Tracing (an evaluation method)
CU	Customs Union
Danida	Danish International Development Agency
DBI	Doing Business Indicator (a World Bank data activity)
DEQ	Detailed Evaluation Question
DFID	(UK) Department for International Development
DID	Difference in Differences
EABC	East African Business Council
EAC	East African Community
EAFFA	East African Freight Forwarders' Association
EAGAP	East African Global Agricultural Practices
EALA	East African Legislative Assembly
EASSI	Eastern African Sub-regional Support Initiative for the Advancement of Women
EATH	East Africa Trade Hub (USAID project on trade in the region)
EATIH	The East African Investment and Trade Hub
EAWiBP	The East African Women in Business Platform
EC	Export Capability
ECA	Economic Partnership Agreements
ECOWAS	Economic Community of West African States
EIB	European Investment Bank
EQUALS	Evaluation Quality Assurance and Learning System
EU	European Union
FEAFFA	Federation of East African Freight Forwarders Associations
FGD	Focus Group Discussion
FPEAK	Fresh Produce Exporters' Association of Kenya
GAP	Good Agricultural Practice
GIZ	German cooperation agency
GoB	Government of Burundi
GoK	Government of Kenya
GoRw	Government of Rwanda
GoSS	Government of South Sudan
GoT	Government of Tanzania
GoU	Government of Uganda
GTAP	Global Trade Analysis Project
HCD	Horticulture Crops Directorate (GoK)
HEQ	High-level Evaluation Question
HGV	Heavy Goods Vehicle
HQ	Headquarters
IBM	Integrated Border Management

ICAI	Independent Commission for Aid Impact
ICBTs	Informal cross-border traders
ICT	Internet and Communications Technology
IFI	International Financial Institution (World Bank, African Development Bank, International Monetary Fund, etc.)
IGC	International Growth Centre
IMF	International Monetary Fund (part of the World Bank Group)
IO	Intermediate Outcomes – TMEA's S2 term for components or Programme Intermediate Outcomes (PIOs) in S1
IR	Inception Report (of the Independent Evaluation)
IRR	Internal Rate of Return
ITC	International Trade Centre
ITIP	Integrated Trade Intelligence Portal (a WTO data activity)
JICA	Japan International Cooperation Agency
JOYWO	Joy for Women
KAM	Kenya Association of Manufacturers
KCP	Kenya Country Programme
Ke	Kenya
KEBS	Kenya Bureau of Standards
KeNHA	Kenya National Highway Authority
KEPHIS	Kenya Plant Health Inspectorate Service
KEPSA	Kenya Private Sector Association
KFC	Kenya Flower Council
KMA	Kenya Maritime Authority
KPA	Kenya Port Authority
KPI	Key performance indicator
KRA	Kenya Revenue Authority
KTA	Kenya Transporters' Association
KTRA	Kenya Trade Remedies Agency
LIFT	Logistics Innovation for Trade
LPI	Logistics Performance Index (a World Bank data activity)
MINICOM	Rwandan Ministry of Industry and Trade
MoU	Memorandum of Understanding
MSC	Most significant change (evaluation method)
NBO	Nairobi
NCTTCA	Northern Corridor Transit and Transport Coordination Authority
NGO	Non-governmental Organisation
NMC	National Monitoring Committee (National bodies tasked to monitor and eliminate NTBs)
NOC	National Oversight Committee
NPV	Net Present Value
NTB	Non-tariff barrier
NTFC	National Trade Facilitation Committee
NTM	Non-tariff measures
ODI	Overseas Development Institute
OECD	Organisation for Economic Cooperation and Development
OPM	Oxford Policy Management
OSBP	One-Stop Border Post
OSIS	One Stop Inspection Station
PAR	Project Appraisal Review (TMEA project approval process step)
PC	Port Charter (Mombasa)
PCC	Programme Coordinating Committee
PGIS	Poverty and gender impact study
PIO	Programme Intermediate Outcome (label in TMEA's Theory of Change)
PIO1	Improved transport laws and infrastructure; for purposes of the evaluation this PIO has been divided into the following three areas of work
PIO1.1	Mombasa Port
PIO1.2	Dar es Salaam Port
PIO1.3	One Stop Border Posts
PIO2.1	Strengthen EAC regional trade integration
PIO2.2	Effective trade agencies, systems and procedures
PIO2.3	Effective NTB mechanisms
PIO2.4	Effective EAC trading standards

PIO3.1.1	Private sector and civil society-led policy formulation
PIO3.1.2	Improved processes for traders, especially women
PIO3.2	Strengthened export capabilities
PIO3.3	Effective and innovative logistics services
PIT	Project Implementation Team
PPA	Preliminary Poverty Analysis (deliverable in Phase 1 of the Independent Evaluation)
PPD	Public Private Dialogue
PSFU	Private Sector Foundation of Uganda
PSO	Private Sector Organisations, also referred to as Business Membership Organisations
PS	Permanent Secretary
PSO/CSO	Private sector/civil society organisations
PT	Process Tracing (evaluation method)
RCP	Rwanda Country Programme
REC	Regional Economic Community
RF	Results Framework (a TMEA spreadsheet of output, outcome and impact indicators)
RI	Regional integration
ROO	Rules of Origin
Rw	Rwanda
RWFFA	Rwanda Freight Forwarders' Association
S1	Strategy 1
S2	Strategy 2
SADC	Southern African Development Community
SCEA	Shippers' Council East Africa
SCT	Single Customs Territory
SCTIFI	Sectoral Committee on Trade, Industry, Finance and Investment
SIDA	Swedish International Development Cooperation Agency
SMART	Software for Market Analysis and Restrictions on Trade
SME	Small and medium size enterprise
SO	Strategic Objective (in TMEA ToC, the top-most programme goal)
SO1	Strategic Objective 1, Increased physical access to markets; also called "Reduced corridor trade times; increased corridor volumes" in the TMEA Results Framework
SO2	Strategic Objective 2, Enhanced trade environment; also called "Increased ease of trading across borders" in the TMEA Results Framework
SO3	Strategic Objective 3, Improved business competitiveness
SPS	Sanitary and Phyto Sanitary
SQMT	Standards, Quality, Metrology and Testing
SRI	Social Return on Investment
SSA	Sub-Saharan Africa
STR	Simplified Trade Regime
SWIFT	Single window information, or interface, for facilitating trade
TA	Technical Assistance
TBM	Time Bound Matrix for the removal of NTBs
TBTs	Technical Barriers to Trade
TCP	Tanzania Country Programme
TEPP	TMEA-EAC Partnership Programme
TFA	Trade Facilitation Agreement (of the WTO)
TFTA	Tripartite Free Trade Area
TGIS	Trade and growth impact study
TMEA	Trademark East Africa
TMSA	TradeMark Southern Africa
ToC	Theory of Change
ToR	Terms of Reference
TPA	Tanzania Port Authority
TPSF	Tanzania Private Sector Federation
TRAC	Trademark East Africa Research and Advocacy Challenge Fund
TTS	Time and Traffic Survey (TMEA's pre- and post-implementation surveys at OSBPs)
TWCC	Tanzania Women Chamber of Commerce
UCP	Uganda Country Programme
UNCTAD	United Nations Conference on Trade and Development
UNDP	United Nations Development Programme
UNESCAP	United Nations Economic and Social Commission for Asia and the Pacific

UNIDO	United Nations Industrial Development Organisation
UPU	Universal Postal Union
USAID	United States Agency for International Development
UWEAL	Uganda Women Entrepreneurs Association Ltd.
VAT	Value added tax
VC	Value Chain
VfM	Value for Money
WAT	Women and Trade
WB	World Bank
WCBTs	Women cross-border traders
WCO	World Customs Organization
WEF	World Economic Forum
WFP	World Food Programme
WITS	World Integrated Trade Solution (A World Bank activity)
WTO	World Trade Organization

Executive summary

Trademark East Africa (TMEA) is a high-profile, multi-donor project that seeks to lift existing barriers to trade to bring about positive and sustainable change via regional and national investments of over \$500 million. TMEA is a large and complex programme, with national and regional dimensions and many sub-projects implemented across a number of countries.¹ TMEA was officially launched in 2011 as a not-for-profit company limited by guarantee, funded by the UK's Department for International Development (DFID), and cooperation agencies in Belgium, Canada, Denmark, Finland, Netherlands, Sweden, and the US.

DFID commissioned OPM to undertake an independent evaluation of TMEA. The main objective of this evaluation is to assess TMEA processes, results and overall value in an independent and impartial manner consistent with generally accepted principles and standards for professional evaluation, and to identify lessons that can inform the ongoing management and redesign of the TMEA programme, as well as future regional trade integration programmes. The Terms of Reference (ToR) set out four key objectives:

1. Test the **theory of change (ToC)**, assessing all causal links and the robustness of underlying assumptions (including links between trade, growth and poverty reduction), and adjusting the ToC² to serve as a reliable guide to interpret the programme and to make programme improvements.
2. Analyse and, to the extent possible, measure: the regional integration programmes' **impact** on regional trade, growth and poverty (and on the various stakeholders – in particular on men and women separately, poor and vulnerable groups, as well as traders and consumers); and **sustainability**.
3. Assess the **effectiveness** of the TMEA programme, including organisational effectiveness, and whether the programme represents **value for money (VfM)**.
4. Throughout, identify **lessons learnt relevant beyond TMEA**, i.e. insights on enabling and constraining factors, critical actions and gaps which would be generalisable to future programmes or to other contexts.³

The independent evaluation is made up of several, interrelated evaluative studies that together meet the objectives of the ToR. This report comprises the Performance Evaluation (PE), tracing TMEA achievements in Strategy 1 (S1) and answering evaluation questions on the ToC, coherence, coordination, sustainability, and effectiveness. It draws on findings and insights from the first phase of evaluation work, as well as document review, site visits and interviews from 2018-2019 fieldwork. The PE is complemented by a Trade and Growth Impact Study (TGIS), a Poverty and Gender Impact Study (PGIS) and a Value for Money Assessment (VfM).

The Performance Evaluation

The objectives of the PE are testing the TMEA ToC (assessing the causal links and the robustness of underlying assumptions), assessing programme effectiveness (including both outcomes and organisational effectiveness), and identifying lessons learnt for TMEA and beyond (including insights on enabling and constraining factors, critical actions and gaps which would be generalisable to future programmes or to other contexts.) The PE design is multi-faceted and mixed-method, to address the broad and complex nature of TMEA programming.

In the PE, the evaluation team traced outcomes for a selection of specific components within TMEA's three strategic objectives (SOs), and examined sustainability and implementation (complementarity of regional and national work, coordination and coherence, and approaches for working with regional institutions in East Africa.)

The PE uses a theory-based evaluation design that brings together a set of methods for data collection and for analysis that are useful to evaluate adaptive, complex, multi-country, portfolio programming. Estimating the counterfactual (comparing observed results to those you would expect if the programme had not been implemented) through an experimental evaluation design was not possible as there are no suitable comparators to the EAC and its partners. TMEA itself is unique among development programmes, in its duration, funding, the scope of its intended outcomes, and institutionalisation. Instead, the evaluation design is based on a traditional mixed method design, but with particular features to answer specific donor evaluation questions:

- Appreciative inquiry to guide interview protocols, responding to the established staff and their concerns about evaluation by starting from the premise of TMEA's successes in the period under review.
- Document review, in-depth interviews and site visits to test the validity of the ToC, and answer questions on coherence with national and regional trade priorities, coordination of operations, sustainability, and approaches for working with regional institutions.

¹ This includes text from the Independent Evaluation Inception Report, November, 2016, where information remains the same.

² Now, the S2 ToC, rather than that of S1.

³ All four studies identify and discuss lessons learnt (obj. 4). Objective 1 is examined most closely in the PE, while sustainability (obj. 2) and effectiveness (obj. 3) are also objects of focus. The TGIS and PGIS look at impacts (obj. 2) and sustainability, while the VfM assessment focuses on value for money (obj. 3).

- Contribution Tracing (CT) to examine effectiveness for a sub-set of TMEA components.⁴ CT builds on and strengthens Process Tracing (PT), an impact evaluation design that enables causal inferences to be made within a single case by ‘tracing’ the implications of causal mechanisms in a results chain, and considering the probative value of evidence for each link in the chain.⁵

Main findings

Evaluation Questions	Main Findings
<p>HEQ2: To what extent has TMEA been effective in achieving expected intermediate outcomes and to what extent has TMEA programme been effective in contributing to achieving programme strategic outcomes? Did the programme bring about any unintended outcomes?</p>	<p>TMEA's S1 goals focused on achieving reductions in time and cost for trade. The evaluation found significant time reductions in trade transport and processes and that TMEA's contribution to these was central.</p> <ul style="list-style-type: none"> • Overall, transit times to Busia and Malaba and time to transport goods from Mombasa to Kigali were reduced, alongside costs, and TMEA's contribution across the programme components was considered 'likely'⁶. • In SO1, ports efforts reduced dwell and truck turnaround time, and OSBPs and the RECTS kept cargo moving along the corridors. • In SO2, time for permit processes at supported agencies was reduced and customs management systems sped paperwork; standards inspections times decreased with faster processing and harmonised standards; and reporting and a monitoring and resolution mechanism helped eliminate NTBs like weighbridges and checkpoints. These overall outcomes were reported by TMEA and its partners, and confirmed by private sector firms using the infrastructure and ICT for Trade, standards, and other improved systems. At the same time there were important weaknesses in data collection and reporting, and the differentiated contribution from SO2 interventions was imprecisely reported and not independently verifiable. • For SO3, the heterogeneity of projects and the insufficiency of indicators made export capability less well suited for the CT case studies. While project-level results were positive, whether TMEA made a difference in exports of the targeted value chains at system level is not in evidence.
<p>DEQ2.1 To what extent has TMEA contributed to reducing corridor trade times and increasing corridor volumes?</p>	<p>The extent of change and TMEA's contribution to reduced transport times</p> <ul style="list-style-type: none"> • Time to import through Mombasa Port has been halved – from around 11 days to 5.5. TMEA contributed between 10 and 20% of this time reduction, while other donors and government activities also contributed to the reduction in import times. Due to limited evidence, no reduction in time to export can be confirmed or disproved. • Border crossing efficiency has increased: From 2011 - 2016, average crossing time at the Busia border into Uganda dropped from 14 to 3 hours. Most OSBPs have similarly dramatic reductions in average crossing times. The evidence suggests that border crossing times through Busia OSBP have been reduced and that TMEA was central to the outcome, as no other donors worked on average crossing times in S1. • Outcomes vary by OSBP <ul style="list-style-type: none"> - Malaba time and costs remained above targets while construction continued, in part due to taking on work abandoned by the World Bank (Malaba is not a case study in the evaluation); - At Kagitumba/Mirama Hills, evidence suggests that it is likely that border crossing times through this OSBP have been reduced and that TMEA was central to the outcome, as there were no other donors or government initiatives at that OSBP. Still, the border has excess capacity; whether the reduced border crossing times would be maintained with increased volume is uncertain. • Northern Corridor 'node' times – port and OSBP – improved, as above, and time to transport on the corridor improved. As a result, transport costs reduced; however, there was no finding of increased trade as a result.
<p>DEQ2.2 To what extent has TMEA contributed to increasing ease of trading across borders?</p>	<p>TMEA supported increased ease of trading across borders, with efforts to strengthen the Single Customs Territory (SCT) and to support countries in adhering to its tenets.</p> <p>The extent of change and TMEA's contribution to increased ease of trading across borders.</p> <p>The evaluation found strong evidence that TMEA contributed to outputs. The key contribution claim at outcome level for ICT for Trade (ICT4T) activities was deemed 'Very likely.' For NTBs and Standards, evidence did not substantiate the outcome level contribution claims, in part because of poor data. Where the NTBs, Standards and ICT4T components did contribute to reduced overall border crossing or corridor trade times, the precise contribution of these elements was not separately quantifiable. Kenya's integrated CMS, a centrepiece for its importance at Mombasa Port, is not yet online, but promises important results.</p> <ul style="list-style-type: none"> • ICT for Trade investments in national customs management systems (CMS) that contributed to reduced clearance times at borders. The evidence suggests that the key contribution claim is true and that TMEA is responsible for the change. • ICT for Trade's regional electronic cargo tracking system (RECTS) that eliminated the need for costly and time-consuming physical escort for risky cargo consignments. The evidence suggests that the key contribution claim is true and that TMEA is responsible for the change. • Elimination of NTBs such as weighbridges and checkpoints which added to time reductions on the corridor. While there is strong data that TMEA's work contributed to the elimination of a number of NTBs, the costs or time saved as a result cannot be quantified, and the analysis concludes that the number of NTBs eliminated is insufficient, as a standalone outcome indicator, to contribute to the easing of trading across borders. • Harmonised Standards to reduce costs and times for testing. There were strong data that TMEA's work contributed to the harmonisation of standards, and supported reducing the costs of testing for traders. However,

⁴ The Contribution Tracing sample document is found at Annex G.

⁵ CT is described in detail in Annex F, including the statistical and procedural steps used. As a theory-based evaluation method, contribution tracing requires in-depth understanding of the ToC. Where these were not part of design and implementation, or were superseded by events, the evaluation team reconstructed them to be able to undertake the analysis

⁶ See Section 3.4.1 for more detail on how judgements for HEQ 2 were reached.

Evaluation Questions	Main Findings
<p>DEQ2.3 To what extent has TMEA contributed to improving business competitiveness?</p>	<p>there was insufficient data from borders to determine how well this was implemented by Partner States, or to determine any resulting effect on time and cost reductions.</p> <p>Export capability projects were small 'pilot projects' (at the insistence of donors) with localised gains supporting business competitiveness. An assessment of the extent to which TMEA contributed to improving business competitiveness overall was not possible because of the heterogeneity of the projects and the insufficiency of overall indicators. Though increasing exports was a shared goal across the projects, the method of arriving at that goal differed, and data around actual increase in exports were not available across projects. Evidence from TMEA country offices, HQ and project actors support the finding that farmer groups were trained, standards adopted at country and individual level, and increased collaboration between government and the private sector. However, not all projects in the component reported on the same outcome indicators, and the wide variety within the component makes an overall assessment difficult. These projects started in 2014 and not all were completed by the end of S1; more gains were achieved by December 2018 in those projects that continued.</p> <p>The extent of change and TMEA's contribution to increased export of goods</p> <ul style="list-style-type: none"> • Most participants received training in standards like Good Agricultural Practices (Global GAP) and adopted standards and good practices. The analysis reveals that these outputs were critical for the results chain leading specifically to the contribution claim of increased exports and that the outputs were achieved through TMEA's contribution. However, data to substantiate the ongoing use of good practices and standards were lacking. • Certification was infrequent because of the costs, and because farmers were not always certain they would have markets for the improved products, to warrant ongoing certification costs. • Market access, including for export, improved for some projects (in Kenya and Uganda), including the recapture of European markets that had been lost because of excessive pesticide residue. The analysis found that not all projects in the component reported on these indicators and the variety within the component makes the calculation of the key contribution claim difficult. • Income gains were also reported with 24-36% gain in values on one crop (according to TMEA RF); tea buyers reported greater consistency and total tea value increased in one country. Some export values improved in Kenya, Rwanda and Uganda, but there were no steady baselines to measure increases across the component. • The reduction in rejections of goods was striking among participants in a Ugandan maize project, as were some gains among tea growers and Kenyan horticultural projects.
<p>DEQ2.4 Has TMEA caused any unintended outcomes? What are they and who has been affected?</p>	<p>The evaluation found scant evidence of unintended outcomes, and none that were well-substantiated or systemic. Those that were identified include:</p> <ul style="list-style-type: none"> • Kenya's government established parliamentary and cabinet committees on trade. • At Mombasa Port, TMEA and KPA increased container capacity more efficiently than foreseen, and Port Reitz Road work had knock-on positive effects on the community that were not planned. • The most frequent claim was that unskilled workers and clearing agents at OSBPs, particularly Busia, had lost their jobs, but the scale of the problem could not be accurately estimated. • Some SO3 projects had unplanned peer-to-peer training, while others found that certification was not always participants' key goal; instead, some projects found and preferred domestic markets. • Outcomes of increased business and population around OSBPs were mentioned but not substantiated.

HEQ5: How robust and verified are the causal links and assumptions in the ToC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?

Programme relevance: ToC causal links and assumptions	
<p>DEQ5.1 To what extent are the causal links and assumptions underpinning the Theory of Change (ToC) evidence-based or verified?</p>	<p>Having one high-level ToC for such a broad programme with project-level results chains was inadequate for implementation and oversight. TMEA focused its attention on high level assumptions although TMEA staff worked at the level of components, countries, or projects, not at the general level. TMEA did not capture data that would test programme assumptions and provide ongoing contextual feedback. The lack of a documented and iterative strategic process contributed to day-to-day challenges faced by country and HQ staff. The Results Framework (RF) helped to address some gaps, as did other strategy documents and the professional, capable specialists who make up TMEA's team. However, indicators, baselines, targets, sources and data were poor or missing, and provided a weak basis for strategic review.</p> <p>To address the shortcomings of the ToC, the evaluation reconstructed ToCs at the component level, ex-post, in order to assess the extent to which the evidence supports the assumptions in the ToC and the expected role of TMEA in causal links. In the broadest terms, the evidence verifies the causal links at output level where causal assumptions were found to hold, but outcome-level causal links held only for Mombasa Port, OSBPs and ICT for Trade. For these components, the evaluation team sought to verify the causal link to an increase in trade, but no such increase was found. The TGIS examines this question using different methods.</p> <p>The assumption that was most frequently cited as unmet was in relation to the capacity of partner agencies and organisations. Across countries and categories of partner, gaps in key capacities kept projects from completing successfully and on time. Private sector and civil society groups most often had gaps in finance and M&E. A second set of issues that most frequently affected TMEA outcome level achievements was the effect of changes in political economy, significantly longer time horizons needed for productivity and reform efforts, and weak or missing evidence on outcomes.</p> <p>Key findings on the strength of causal logic behind the components included:</p> <ul style="list-style-type: none"> • TMEA and external evidence verified causal links from SO1 infrastructure projects at the level of outputs, including soft infrastructure. Data also verified TMEA's claim that the outputs would lead to reduced time to import, though any change in time to export was not verified by data. The higher-level causal links from reduced port delays to lower port costs and from lower port costs to greater trade were also not verified. The key assumptions on port reforms were not realised, which undermined the TOC's goals for port efficiency.

HEQ5: How robust and verified are the causal links and assumptions in the ToC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?	
	<ul style="list-style-type: none"> • The transport observatories helped TMEA and national governments, port and revenue authorities, and private sector stakeholders monitor progress, particularly at ports. However, the weak quality and use of some data undermined the causal links through which the observatories might have helped improve performance. There is no evidence that TMEA collected information on whether and how data were used by decision-makers - missing an opportunity to test this assumption. Not having these activities in the ToC obscured key links to the other actors and data gaps left other causal links – in exports and customs compliance – unverified as well. • ICT for Trade projects in regional cargo tracking, single windows, and customs had important successes at output levels, and some integration at country level, as with single windows and customs systems. There is evidence that causal links and assumptions held in Rwanda at outcome level, with reduced customs clearance times, but reductions in Uganda were slight and those for Kenya and Tanzania were not reported due to the systems not being online. Data on Single Window projects verified the assumptions and causal links around reduced permit processing times at output level. Extensive private sector interviews verified outputs through the causal link of improved ICT4T systems. • Standards work carried out at national and regional levels achieved important output-level successes on key ToC assumptions, however, the two levels did not reinforce each other, such that there is no verification that harmonisation of standards resulted in ease of trading across borders. The component would have benefited from a coherent ToC that made national teams responsible for improving border compliance with harmonised standards, and made the regional team responsible for promoting harmonised regional quality infrastructure. • The NTBs component eliminated 116 NTBs but the evidence did not verify a causal link at outcome level of increased ease of trading across borders. Moreover, assumptions about sustainability were not borne out, within a climate of increasing trade disagreements. • For 'enabling' projects in SO2 and SO3, causal links in re-created component-level ToCs produced some verifiable benefits at output levels, towards a strategic outcome that was not trade, per se, but improved conditions for trade among important stakeholders. At the outcome level, the causal links are not verified, as to how the projects fit together into a larger set of goals and how those higher-level results would be achieved. Outcome level indicators were missing or unclear and even where they showed strong improvement the causal assumptions did not hold. SO3 work on export capability generated some important successes for some value chains at output and outcome levels. Still, the component's broader causal link to increased exports was not verified, except for those specific producers and value chains. • The Logistics component supported industry-level advocacy efforts and training for multiple actors across logistics-related industries; however, the component failed to complete much of its programming and therefore the causal links and assumptions were not verified.
DEQ5.3 To what extent does the programme support EAC regional trade development priorities?	From the outset of S1, TMEA strongly supported EAC regional trade development priorities. TMEA's work was closely aligned with the EAC's Regional Integration (RI) agenda, and TMEA supported the priorities to a great extent. While there is a case to be made that the momentum for RI in the region has slowed, much of TMEA's original focus on RI can clearly be seen across the S1 ToC.
DEQ5.4 How have changes in policy and in the political economy in the region impacted on the programme or on its relevance?	<ul style="list-style-type: none"> • TMEA leadership positioned themselves as neutral brokers and were wary of putting political economy considerations on paper. Tracking how they managed such issues was challenging, though there was evidence of attention to political economy in many evaluation interviews. • Respondents reported changes in political economy that affected programming. Foremost were disagreements between countries and changes in government, whether through elections or ministry reshufflings. These affected programming dramatically in terms of timelines: many projects slowed considerably to bring new leaders on board. Changes in policy and political economy particularly impacted TMEA in Kenya and Tanzania, though problems often spilled over to other countries – as with the Kenyan elections and insecurity in Burundi. Projects for reform at both ports, but particularly at Dar Port, were curtailed when new political leadership was not aligned with earlier TMEA plans. • TMEA remains relevant to the sector. The issues from the original Business Case remain; the proposed benefits of RI still have economic incentives to offer the Partner States, if appetite for RI continues. Donors are impressed with TMEA's political savvy and relationships. Government partners perceive TMEA's work as more aligned with national and regional efforts than with donors' agendas, and report that TMEA flexibly addressed challenges that emerge: adjusting timelines, reallocating funding, and mitigating problems before they arise.
DEQ5.5 Do TMEA interventions complement other ongoing initiatives (both government and private sector)?	Across all Strategic Objectives (SOs) and countries TMEA complemented government and private sector initiatives. TMEA's alignment with agency and government priorities (see DEQ5.12) aided this complementarity: stakeholder communication was described as 'guided by the government' which appears to have been instrumental in building on shared goals and avoiding duplication.
Coherence and coordination	
DEQ5.6 What are the strengths and weaknesses of the working model observed to date?	<ul style="list-style-type: none"> • TMEA's status as a multi-donor programme was considered a strength. Inputs from multiple donors created more significant funding that allowed catalytic investments on major efforts (berth upgrades, EAC support, development of IT and other systems), and project and programme planning at a more impactful scale. The multiple donors also distanced the programme from donor political agendas, helping TMEA's neutral broker role, in an environment and sector that have many competing interests. • TMEA's results can be credited in part to working at both national and regional levels, engaging with governments across agencies, and working on holistic goals like the corridors and the SCT. Its budget, while larger than traditional development programmes, is a fraction of the development banks – yet TMEA's influence on trade in the region is broad and sustained.

HEQ5: How robust and verified are the causal links and assumptions in the ToC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?	
	<ul style="list-style-type: none"> TMEA parlayed its profile and staff composition into durable relationships with government interlocutors at technical and political levels. This created ownership and long-term relationships that aligned with local systems, two key goals of the Paris Declaration principles. However, the breadth and depth of the problems TMEA worked to overcome presented challenges and risked eroding TMEA achievements. Many project timeframes were extended, increasing some costs.⁷ TMEA processes for procurement and approvals slowed as S1 progressed. And there were questions around TMEA's ability to assess capacity levels, design projects to work with present capacity, build capacity to keep pace with programming, and build institutional as well as individual capacity for sustainability. Challenges around efficient operation, such as procurement and decision-making, were not reported universally; but these challenges do appear to have worsened (for some projects) with the advent of the Board-and-Council structure and additional layers of scrutiny and approvals.
DEQ5.7 Is the complementarity and coordination between national and regional levels optimal throughout all programme components and activities?	<ul style="list-style-type: none"> Some TMEA country office representatives would have preferred greater technical control over programming and budget decisions. Country staff claimed greater contextual knowledge supported their technical expertise. HQ respondents were more likely to report that coordination had improved and reported that improved Board oversight resulted in better and more consistent programming. Such diametric perspectives often exist in structures that are configured with a hub and spokes. TMEA succeeded at empowering country programmes through the NOCs, which were vibrant and active bodies with high levels of ownership and mutual accountability. Matrix management delivered benefits and team members were optimistic about its utility. However, large-scale infrastructure projects presented more challenges for the line of reporting, with some resulting tensions around decision-making. Complementarity and coordination were not optimal in these areas. There was broad consensus on the utility of the matrix management structure but a recognised need for flexibility with regard to large projects, expansion, and national technical expertise, particularly as the TMEA institution grows beyond the original country programmes.
DEQ5.8 To what extent does the TMEA model bring greater results than the sum of its parts? How could this be strengthened?	<ul style="list-style-type: none"> The TMEA ToC gave the impression of complementary silos; the PE found evidence of active synergies between activities and components to a considerable extent. The 'enabling' components of the ToC were the most visible: strengthening EAC regional trade integration, supporting private sector and civil society in advocacy, and improving processes for traders, especially women. The small structure of TMEA country offices made staff members' tasks extensive. But staff are likelier to see potential synergies within SOs in context and across teams. Longevity, advancement in the organisation, and working relationships created a fertile environment for thinking across SOs with peers. Empowering country teams with a direct and active role in component-level ToC planning would strengthen their ability to take advantage of opportunities to work synergistically. Core funding was a driver for a more integrated ToC. A supply and demand relationship between strategic objectives also drove synergies: SO1 and SO2 supplied an improved trade 'pipeline' while SO3 private sector and civil society users demand these improved trade conditions. However, this relationship was imbalanced: SO1 and SO2 were far more substantial than SO3, at a ratio of about 6 to 1 in terms of spend, at least in part because of donor preferences. The net result of building a more accessible pipeline, if domestic businesses are not exporting more, is to enable imports – which would not tend to support pro-poor goals. S2 programming appears to have a greater focus on filling that pipeline with nationally produced and value-added goods, representing an effort to strengthen this.
DEQ5.9 Is using one organisation – a not-for-profit company – the best vehicle for impact on trade, and on poverty reduction through trade? What are the strengths and weaknesses of this approach?	<ul style="list-style-type: none"> The model served important donor interests: permitting multi-donor funding, establishing offices in multiple countries, retaining influence over programming, allowing adaptive decision-making in portfolio projects, and establishing an arm's-length relationship. TMEA avoided potential misalignment between strategic direction and fiduciary oversight by having a bespoke risk control function in-house, warranted by the scale of TMEA investments. The structure supported TMEA's neutral status: 'trade facilitators providing expert services', not too linked with one or another political agenda or 'susceptible to the politics of aid', and working with everyone from the EAC Secretariat to national governments to private sector and civil society. The system of Council, Board, and NOCs allowed for bespoke risk management, provided entrée through well-positioned local leaders, and built in donor oversight and critique. Board and Council did not always agree, as donors had to represent their governments' concerns. Some difficulty in reconciling the two perspectives was unavoidable when funding comes from development partners. See also the response to DEQ5.10, below.
DEQ5.10 To what extent are the programme's governance arrangements leading to the delivery of high quality and timely outputs?	<ul style="list-style-type: none"> TMEA was constituted with a Board made up of East African private sector leaders and a Council of donors who sat biannually. The Council shared governance with the Board, which met quarterly and had fiduciary responsibility for TMEA. The donors had less responsibility for operational decision-making, but could step in with their concerns, which carried decision-making weight. The structure was not free of frictions, but in S1 these were preferred to having donors on the Board, which affected delivery because of their tendency to be more risk averse. Partners and TMEA staffers at country level were nearly unanimous in praising the NOC structure, because it enhanced country ownership and helped them with delivery, including accessing NOC members' networks and utilising their influence to facilitate success. Ownership and employing one's political capital ensured that NOC members were invested in the fine-tuning and delivery of high-quality outputs and in closely overseeing TMEA staff work in each country. The new structure (Board and Council) was a better fit for the organisation but added steps to the process that resulted in some delays with approvals, according to partners and TMEA staff. Timeliness was affected, but the

⁷ DFID. 2017. Trademark East Africa Due Diligence Report. August 2017. Africa Regional Department and DFID East Africa Offices. Deloitte and Touche Kenya

HEQ5: How robust and verified are the causal links and assumptions in the ToC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?	
	<p>Board's ownership of and responsibility for outcomes grounds their decision-making in strategic consideration of potential benefit for East African countries and citizens. For this reason, they were demanding of TMEA staff Project Appraisal Reports (PARs) and active in pushing for progress that met the needs of trade in the region.</p> <ul style="list-style-type: none"> Board, Council and NOC governance arrangements facilitated quality outputs, in bringing in local knowledge and networks, while scrutinising PARs and progress, and troubleshooting. The NOCs were particularly important for the quality piece of this evaluation question.
DEQ5.11 Is the operational model at donor level appropriate and efficient for delivering TMEA? What are the key enablers which need to be preserved, and what are the remaining constraints arising from donors' systems?	<ul style="list-style-type: none"> TMEA's position between partners and the multi-donor council acted as a filter and 'buffer' in both directions: donors had only to deal with one implementer who was responsible for outputs and outcomes, and partners had only one donor interlocutor, who was seen as more neutral. To a good extent, this was an appropriate and efficient model for delivering TMEA: appropriate, because it worked for multiple donors and partners who shared trade goals; and efficient, because the transaction costs of starting, administering, and closing multiple donor projects were effectively streamlined into one administration over a longer period of time. Some splintering of this efficiency occurred when donors earmarked funds, or when they made separate arrangements for monitoring and evaluation. At the same time, the duration, size, and breadth of TMEA programming in S1 appeared to have been a challenge to monitor, and there were gaps in how the donor consortium has done so. Key enablers that need to be preserved are donors keeping abreast of sector developments in their working groups to bring new initiatives to light, and donors sending representatives to NOCs.
DEQ5.12 Did TMEA align with country systems and agencies in an effective manner for ownership, and for impact? How could this be strengthened?	<p>TMEA operated in large measure on a demand-driven model, particularly with government partners, effectively aligning with country systems and agencies. This was reaffirmed in dozens of evaluation interviews, where the evaluators heard that TMEA was 'different to other donors', committed to agencies' 'substantive engagement and leadership' in decision-making and implementation – clearly in line with the Paris Declaration in alignment and ownership. The NOC structures were particularly indicative, with strong local leadership from government and the private sector, holding programming actors to account for progress and using their networks to problem-solve. Private sector and civil society partners were more likely to report that TMEA's design decisions did not align well with their own mandates. Working with organisations with less capacity, as happened in SO3 at times, led to more top-down design constraints.</p>
DEQ5.13 Are the focus and activities of TMEA consistent with, and additional to, those of others' development programmes in the region? To what extent has the programme facilitated improved coordination?	<ul style="list-style-type: none"> That TMEA was demand-driven, less tied to a given donor agenda, and more able to convene stakeholders, was in itself an accomplishment in coordination. The focus and activities of TMEA were consistent with those of other development programming, with coordination sufficient to avoid duplication of efforts and ensure that key gaps were filled. For some activities in some countries, TMEA facilitated improved coordination, but this was not reported in all cases. There were good examples in key components where TMEA worked alongside other development partners to deliver more together than they might have on their own.
DEQ5.14 What sorts of approaches have been more successful in working with regional institutions in Africa?	<ul style="list-style-type: none"> The evaluation found that TMEA's responsive, consultative, demand-driven model contributed to success in their engagements with regional institutions. They were able to gain buy-in at design stage and encourage ownership, giving regional institutions incentives for committed engagement. There was value of TMEA having its office in Arusha, where programming was coordinated and technical support was at hand, including embedded staff in some departments. The Project Coordination Committee (PCC) helped organise engagement and monitor progress, while building TMEA's credibility with the Secretariat. TMEA, Partner States and regional authorities engaged with an eye towards opportunities for collaboration', through consistent, frequent, substantive project and partner communication.
Sustainability	
DEQ5.17 What benefits (both social and financial) of the programme are likely to be sustainable and would continue with or without TMEA (staffing and funding)?	<ul style="list-style-type: none"> Capacity building is sustainable only in so far as it is embedded in institutions, rather than limited to training individuals. The scope of TMEA's S1 programming made this challenging, considering the vast number of agencies across six countries and the Secretariat who were involved. Projects resulting in legislation or policy changes, ongoing budgets, or new systems were likelier to be sustained; TMEA sought this through MoUs and steering and technical committees. Political economy could and did interrupt best intentions on sustainability. Sustainability was more in question with private sector and civil society associations, SMEs, cooperatives at grassroots levels, where initial capacity and funding were particularly weak.
DEQ5.20 How are stakeholders engaged through the programme and beyond its life, and how do they take TMEA lessons learnt into account?	<p>Stakeholder engagement was a priority for TMEA and resulted in a high level of ownership. The most commonly cited lessons to be taken into account were of a project management nature: TMEA had a strong demonstration effect. Agency partners cited lessons from needs assessments, VfM, using timelines, 'linking activities with outputs' and using baselines, and improving procurement. Change management was cited as a lesson. Those working on NTBs cited bilateralism as more effective than regional forums. Private sector partners felt the platform model helped them speak with one voice, even across the region, and that using research and evidence strengthened their stances. Export capability partners cited the value of highly 'hands-on' training. Both TMEA staff and TMEA donors suggested longer 'more realistic' project time frames to avoid extensions.</p>

One outstanding evaluation question (at outputs level) from the earlier evaluation studies asked:

Evaluation Questions	Main Findings
<p>DEQ1.4 Who were/are the main beneficiaries of the outputs? Are there organisations or groups of people who are negatively affected by the outputs?</p>	<ul style="list-style-type: none"> The main beneficiaries of SO1 and SO2 investments were traders and shippers utilising the soft and hard infrastructure at ports and OSBPs, and governments for whom automation of permit services increased transparency, traceability, integration along the corridors, and systemic conditions favourable to increased trade. Traders who applied to the Authorised Economic Operators (AEOs) programme and who were successfully audited benefited from expedited screening at border crossings, which also benefited the government in rationalising its risks. Interviews were conducted with logistics company representatives, traders, and shippers - both those who had partnered with TMEA and those who had not. Most respondents were men, reflecting a sectoral population that is skewed towards men. In almost all cases these individuals spoke on behalf of their companies, some of which included women employees. Female respondents reported similar benefits from their companies' use of the new systems. Logistics firms with whom we spoke said that exports had remained a small fraction of their businesses, while international imports had increased. This suggests a benefit for firms outside the region but less so for East African firms, in terms of trends. While there were some good years for intra-regional trade during S1, overall that trade slowed from 2015 to 2018. Larger logistics firms were better able to take advantage of the improvements to trade systems: firms with IT and experience, more staff working on Customs and permits, located in capital cities where trainings were offered had greater incentive and ability to take up this kind of upgrade quickly and easily. Given the focus on systemic upgrades and the donor disagreement about TMEA working in export capability, SMEs in S1 were not as much a focus of S1 work. SMEs were less well-represented on standards technical committees, for example. TMEA's S2 design has a much greater focus on creating conditions for SME participation in trade. In SO3, beneficiaries included women and men cross-border traders at TMEA OSBPs, SMEs and entrepreneurs who learned ways to take advantage of trade at smaller and larger scales. As the target of the Women and Trade programming, women cross-border traders, export-ready women entrepreneurs, and women farmers were the majority of beneficiaries from these activities, having received training in the use of the Simplified Trading Regime (STR) and entrepreneurship. They report reduced border crossing times and some evidence showed women's incomes had increased.⁸ Civil society organisations also worked with TMEA to advocate on behalf of women cross-border traders, consumers (both men and women), and producers (both men and women). Private sector associations and apex bodies were key beneficiaries of the capacity building on advocacy and platforms work. Industry actors came together from separate sub-areas, such as trucking companies and logistics firms in a logistics platform, and hoteliers, restaurant owners and tour companies in a tourism industry platform, enabling them to speak with one voice. Projects at OSBPs negatively affected clearing agents, as automation had made their jobs redundant. Manual labourers also lost jobs at Busia, where they had been paid to load and unload; with fewer inspections, their services were no longer needed. Most job categories with losses were traditionally filled by men. No effort to mitigate this was found, by TMEA nor other donors or government actors at the OSBPs. Some beneficiaries in SME projects were not computer literate and were not able to use the new ICT systems in place. Others who spoke non-dominant languages were less able to benefit from training and materials. These were primarily women's groups in Rwanda and Uganda, per the field research – though the sample was not randomly selected, and therefore not representative.
<p>Gender</p>	<ul style="list-style-type: none"> TMEA's 2015 Gender Strategy provided a framework for TMEA and partner actions on gender that made progress – particularly in a set of activities targeted specifically around gender at border posts and with entrepreneurs. Activities targeted towards gender mainstreaming and gender-sensitive policy frameworks remained incipient and/or not a priority for regional and national partners. TMEA has made progress as well in terms of its institutional culture, offering opportunities for advancement within the organisation. At the same time, prioritising gender across programming has been uneven, with some staff saying there is no time for adding a gender focus.

Key recommendations

Overall

- TMEA should take on less to accomplish more.** The breadth of S1 programming made an important difference for comprehensive regional integration efforts but there were significant political economy and capacity challenges in most components – which TMEA call Intermediate Outcomes (IOs) in S2. Make strategic decisions about the agencies to support with ICT for Trade, or the PSOs/CSOs to support on advocacy, for example, and ensure that the projects are in-depth enough to effect the kinds of differences envisioned in theories of change. Part of the strategic decision-making for this should include those partners that are both well-placed to influence systematic change, and proactively seeking to do so. Projects and IOs need more realistic timelines that include the capacity building and political relationships that must be carried out.

⁸ Please see also the Poverty and Gender Impact Study (PGIS) from OPM that is linked to this evaluation, but which conducted targeted research about TMEA's work with women and trade in some of the areas around new OSBPs, as well as entrepreneurs in cities and cooperatives and other farmer groups in rural areas.

2. **TMEA should look at capacity building holistically**, but plan at the detail level which are: Develop a capacity building framework that guides project design and appraisal planning including exit planning. Bring in organisational development technical assistance as a condition of partnership, to include detailed planning for organisational change measurement with purpose-built rubrics around capacity goals established with each partner. Conduct needs assessments that foreground capacity building gaps identified in S1. Track institutional capacity building assumptions and act remedially when those assumptions do not hold. At project level, take on fewer projects with organisations requiring in-depth efforts to build basic capacities.

Institutional capacity building should start from stakeholders who know what they need. Focus on agencies and organisations where partners share the appetite for change – by frank and strategic discussions on capacity challenges – including in monitoring and measurement (see Recommendation 9, below) – from the earliest stages. Use change management strategies learned with other interventions like SWIFTs and CMS, and continue using these systems for institutional capacity building.

TMEA should continue demonstrating good project management and incorporate these skills into capacity building for implementing partners. Adult learners do best with significant hands-on training, to help them conduct their own audits or needs assessments, or construct VfM or other M&E KPIs. Helping them develop better procurement rules, set timelines, or decide on change management priorities and methods. Ensure cascaded training uses inclusive materials and methods, including active learning.

Donors should support this work for its long-term institution-building effects, for its alignment with the Paris Declaration imperative for country ownership, and for its realistic pathway to systems change. The more visible and measurable outcomes that tend to be in donors' focus may be slower to materialise, but also more durable, relevant, and country-led.

Gender

3. **TMEA should continue to work with women in trade at borders and with organisations like co-ops and other export-ready groups.** TMEA has expressed impressive numeric goals for this work in S2 that are less important than building capacity and supporting durable access to markets – the programme should emphasise quality of the interventions and outcomes over quantity. There are additional recommendations and details on this point in the Poverty and Gender Impact Study but, in short, devote attention to working with the 'very poor' and with women and men living with disabilities to improve long-term outcomes, which will require more in-depth programming – perhaps 'bundled' or with partners – to ameliorate the intergenerational and multidimensional poverty faced by the most vulnerable. At the same time, indicators at outcome level should reflect longer-term policy change and systems that are also targeted – not just aggregated numbers of those supported, or policy papers submitted. Ensuring that the interventions work for the poorest and embedding policy in institutions require effort and resources, but both should be prioritised over simple numeric goals.

TMEA should also capitalise on opportunities to mainstream gender in other IOs of S2, such as the interest expressed in the logistics industry, to ensure that authentic gender-focused activities permeate on-the-ground implementation. TMEA should work to include gender in actionable ways like ensuring that EAC and national OSBP manuals, training, procedures and operations also reference expectations (such as the Cross-Border Charter) regarding issues around gender and marginalised traders.

4. **TMEA should implement the 2015 Gender Strategy**, or its S2 equivalent, internally and with partners. The planned annual gender audits should be used to look closely at how project statements about gender in PARs are implemented, and to track indicators on gender. Bring in trade and gender experts for audits, but also across the research agenda, and for IO planning. Gender should be part of the ToC process recommended below as IO and country teams look at how to have a wider impact on the poor – and to document it. This also requires stronger gender indicators – both outputs and outcomes – as well as baselines, identifying gendered aspects of transport and trade systems work, and overall stronger monitoring with attention to context and assumptions.

Theories of Change

5. **The consortium of donors should ensure that TMEA employs an iterative and candid ToC process** at the level of programme IOs, with a parallel exercise – repeated twice annually – of planning across IOs. There was considerable cross-pollination among components in S1, and logically so, given the interconnected nature of TMEA's programming. This bears continuing in S2. Evidence for whether TMEA component programming led to increased trade, and thereafter to reduced poverty, was inconclusive in this evaluation, and will remain extremely difficult to quantify or to track conclusively, particularly with regard to contribution. The more operational and useful levels of the TOC, therefore, are at this IO level, where TMEA can have more measurable results in S2.

Such a process should involve country team members, rather than being an HQ-directed exercise. A bi-annual exercise is suggested so that the people who know the most about strengths and challenges can focus operationally on what is and is not working and why. Leadership will need to establish space for open discussions in which staff can speak freely about problems without fear that they will be held responsible for those problems. Given that TMEA aims to remain in the trade space in East Africa, it would benefit their team to establish such open space for discussion, deeply questioning the assumptions that underpin both the project-level activities and the higher aspirations of the IOs. Mapping an agency's permitting or testing and certification processes is valuable at the project level, for example, but mapping the agencies in a country or the greater quality improvement structure is necessary for long-term changes like those proposed. Staff involved at IO level – across IOs – will be best placed to provide the necessary candour and support their team members to find timely solutions or adjustments.

It may also be preferable, given TMEA's expansion, to allow greater differentiation of ToCs by Country Programme. The iterative process described above should candidly consider political economy and contextual realities about what can be accomplished. Involve Board and NOC members in examining assumptions and strategizing about what steps are possible to remove or reduce the political economy and other obstacles, and to re-think programming when such steps are not possible. The ToC should not be an overarching roadmap of the spheres of activity necessary for increased trade. **Donors should be part of this process at a strategic level** and, while listening to the knowledgeable East Africans staff and Board about political economy and contextual issues, should also play devil's advocate around assumptions and causal links, and be prepared to bring research, best practices and challenges from other interventions.

6. **TMEA should pay more attention to monitoring and managing assumptions at the IO level** – examining the assumptions that underpin strategic design is separate from looking at risks by project. The highly political environment and multiple powerful interests within the sector demand that assumptions be reckoned with systematically. This includes assumptions about political economy and political will for reforms; operational assumptions about government commitment to utilising infrastructure in the manner intended; and assumptions about capacity in organisations and agencies with whom TMEA decides to partner. Collect regular data about these assumptions that feeds into the iterative ToC process described in Recommendation 5.
7. **Other key questions require research.** TMEA and donors should develop a research agenda on key unknowns that affect programming. Are trade cost reductions passed through to consumers? When are producers 'export-ready', and what are the incentives? What bundle of interventions will help the very poor beneficiaries like informal traders? What are the remaining bottlenecks at border posts that are not captured in the TTS – including variance in crossing times? Are border inspectors incentivised sufficiently for mutual recognition of harmonised standards? What are the tipping points or drivers for firms to make the decision to export or export more?

Results and data

8. **The donors and TMEA need to improve indicators and data quality across the board.** TMEA and the Council should have an open dialogue about their expectations for the RF, at a greater level of detail. For typical development interventions, the RF can serve donors' needs well to report home on progress and monitor contractor compliance. But TMEA's portfolio approach requires a more flexible relationship with RF indicators that shift with programming. Second, the size of the programme has made it harder for donors to manage these issues closely, exacerbated in S1 by turnover in donor management. Successive annual reviews noted the same problems with data that were not remedied, resulting in indicators with incomparable data, or no data, and gaps in coverage. TMEA should fund the Northern Corridor observatory project, for example, to collect data relating to exports, as it is a national and EAC priority.
Also, TMEA's corporate-level indicators should report at a system-level scale, not a project-level scale (numbers of trainees or even 'trained entities'). Rolling these types of indicators up to strategic level tells an incomplete story. TMEA's Corporate headquarters and its country leadership should strike a better balance with country-led strategic design and indicator development, and overall regional goals, with higher order indicators. Country programmes and donor representatives should be more deeply engaged around quality indicators for IOs at the national level, and overall donor oversight should show greater commitment to developing an exemplary regional level RF, and helping TMEA secure the appropriate data for it. These needs will intensify as interventions and countries expand in S2.
9. **Improving indicators also means TMEA will have to support partners more on data.** Train partners to produce the kinds of data that will show what they and TMEA are accomplishing together. This means clear baselines (prior to using new standards equipment, for example, or on transit times) and realistic targets appropriate at programme levels. Most importantly, when there are gaps in the data, like those pointed out in this report, TMEA (and donors who are monitoring data more regularly) should flag and remedy these

problems, rather than letting the problems compound over time. TMEA's MEL team may need support first, to have the capacity to help partners build stronger data procedures in their institutions.

10. **The Evaluation Committee should prioritise and limit donor evaluative work.** Donors, TMEA and the Committee should limit the number of interruptions to their time on task. Evaluation should be prioritised and appropriately scheduled and use more 'light touch' or data-focused techniques. Importantly, the donors, TMEA and the Evaluation Committee should undertake evaluative exercises without revisiting issues repeatedly to fit different scopes of work. The group should also be sure that evaluation products are useful and targeted, and then shared in digestible formats with country offices.

Coherence and coordination

11. **TMEA should continue with its demand-driven, 'neutral broker' model of operations** that worked so well in S1. Continue to provide incentives to partners for new systems and for reforms by giving stakeholders a strong say in what will be done, and how. Continue to nurture relationships and build the TMEA team's technical and interpersonal strengths to facilitate entry and implementation.
12. **TMEA should formalise their coordination with other donors, and TMEA donors should help ensure this happens successfully.** There would be strong benefits to more formal and structured coordination with other donors – through existing structures such as the working groups or following a prioritised schedule. Though this is a challenging role, TMEA's size, longer duration, and placement in the key capitals of the EAC should play a key role in sectoral coordination. As the 'catalytic' partner, acting as a leader in the sector would offer more opportunities to leverage other donors' priorities, conduct joint research (while sharing costs), and acting in a coordinated fashion on political economy issues that threaten the sector as a whole. Coordination with other donors on productive project work could also leverage other donors' investments to better 'fill the pipeline' of national exports.

Governance and structure

13. **TMEA and donors should maintain the current structure, while looking for ways to streamline.** Preserve the structure that was shown to fit donors' and partners' needs, and to put local knowledge and connections front and centre in decision-making and problem-solving. At the same time, increasing layers of approvals and longer timelines for this process will constrain TMEA in S2, given the broader geographies. TMEA has tested using technology to fast-track some expenditures to streamline, but could be applied to more approvals, such as with processes pre-approved by NOCs and country donor leads.
14. **Donors need to make choices about 'doing development differently'.** For all the ways TMEA is different, at present it remains a donor-funded programme. If donors are committed to precepts about genuine country ownership and empowerment, they should limit earmarking, sponsor national priority-setting fora, facilitate TMEA's interests in self-funding models, or experiment in allowing national partners to determine more directly how trade funds would be spent. However, with such an important financial stake in TMEA, donors should not compromise on close attention to project management fundamentals and technical oversight on ToCs and results reporting, and they should ensure handovers are thorough and infrequent.

Particular strategies

15. **Donors and TMEA should ensure robust SME participation across S2 programming in TMEA.** Since SMEs drive the region's economies, it makes sense that entrepreneurs at this level would have a bigger seat at the table. Given S2's focus areas, TMEA are already thinking about this issue, as discussed with the Standards team lead, concerning the participation of SMEs on technical committees for harmonising standards; or with the Logistics lead, who noted the need to buttress the skillsets of smaller, local firms in transport and logistics services. Introducing greater SME participation as a goal for platforms and apex bodies has the potential for wider participation in these as well.
16. **TMEA should conduct strategic mapping** around the plethora of trade agencies in SO2 (for both ICT4T and Standards) to make evidence-based and politically savvy decisions about which agencies to support. Empower the IO leads to work cross-nationally on the key question of how a regional quality infrastructure would look and perform, and undertake programming based on that broader view.
17. **TMEA should raise the stakes on NTBs** by increased policy work to amend the NTB Act with a legal means to contest NTBs and consequences for countries who impose them.
18. **TMEA should monitor mutual recognition of harmonised standards at borders**, to understand the extent of implementation of EAC-agreed procedures for accepting certified products with no further inspection or duties paid. TMEA should also collect and report on the degree to which time and cost for traders is impacted, against targets. This would involve programming specifically for that outcome, and

working with national bureaux of standards on how they collect data, how they train border staff, and how they ensure compliance at remote sites (that is, borders).

Sustainability

19. **TMEA ‘*taking on less to accomplish more*’ (Recommendation 1) supports sustainability as well.**

Selecting a smaller number of partners would allow TMEA to work more strategically with those partners, resulting in strongly embedded institutional capacity, legislation or policy changes, budget line items, development of revenue sources, or other markers of sustainability. This is especially important where initial capacity for fundraising and fiduciary management and even core functions are weak, as with the smaller, less experienced co-operatives or small CSOs in SO3. To avoid the risk – becoming part of the institution – this kind of work requires a steady but sure handover.

1 Introduction

1.1 Trade and the EAC: programme context and development issues

The East African Community (EAC) was revived with the Treaty for the Establishment of the East African Community signed in 1999 by Kenya, Uganda, and United Republic of Tanzania. It was further enlarged with the admission of Rwanda and Burundi in July 2007 and the succession of South Sudan in 2016. The EAC Single Customs Territory became operational in July 2014, with further integration to be achieved according to an ambitious calendar. The EAC aims to widen cooperation among Partner States in economic, social, and political arenas for their mutual benefit. The ultimate aim is to establish a Political Federation of the East African States.

The EAC is home to 172 million citizens with the population expected to grow to about 200m by the year 2030, and a land area of 2.5 million square kilometres. Its combined Gross Domestic Product is of US\$ 172 billion (EAC Statistics for 2017)⁹ which makes it one of the fastest growing regional economic blocs in the world.

The EAC member countries have diverse features¹⁰: Kenya is the region's largest economy and is a regional trade, finance, communication and manufacturing hub; the World Bank says Kenya is comparable to the best economies in Sub-Saharan Africa (SSA) in terms of innovation.¹¹ Uganda is the region's bread basket and distribution centre. Tanzania has a strong agricultural base and natural resources and the largest population among the EAC economies. Rwanda and Burundi have small economies; Rwanda is famous for its zero-tolerance to corruption, which earned it the continent's highest score on institutional quality from the World Bank's 2018 competitiveness report.¹² Burundi is still recovering from a long civil war but is undertaking significant economic reforms. At present, the EAC Partner States present generous business and investment opportunities in various sectors – from agriculture to manufacturing, tourism, financial services, and ICT. EAC is the second largest market in Africa, with a growing middle class whose demand for products and services has driven growth on the demand side.¹³ In Rwanda and Kenya, the World Bank's Ease of Doing Business Index ranking has improved steadily.¹⁴

Despite its major achievements, the EAC still has further to go. A TMEA strategy document¹⁵ suggested that issues lie with the competitiveness of the EAC, a problem which has persisted since TMEA drafted that document near the beginning of S1. The World Bank continues to score SSA as the least competitive region in trading across borders; the score for the EAC subregion across the twelve pillars of the World Bank's rating places it near the bottom of SSA subregions.¹⁶ Though there have been improvements since the start of TMEA's S1, there are still significant delays in the transport of goods. In a 2017 study, truckers on the Northern Corridor estimated that 64% of their time from Mombasa to Kampala was idle time – either resting time (30%) or waiting to cross borders, be weighed at weighbridges, or other obstacles (34%).¹⁷ This figure is corroborated by 2017 USAID Transport Hub satellite data on the Northern Corridor, which places average idle time at 60% or greater for various segments and both directions on the Corridor.¹⁸ These times translate into high transport costs for shippers, particularly those in land-locked countries – though Northern Corridor costs, too, have improved since about a third since 2011, as shown in the Shippers' Council of East Africa's 2016 Logistics Performance Survey.¹⁹ TMEA's corridor observatory data show these reductions in cost and time through the end of S1, but since the end of S1, new costs in terms of time and money have arisen.

The task of improving the competitiveness of the EAC is a generational enterprise. TMEA has sought to choose its focus areas in line with their comparative advantages and those of other relevant actors – national and regional government bodies, development partners, and the private sector. In its Strategy 1 (S1), TMEA put forth substantial efforts to support trade and the regional integration (RI) process.

⁹ <https://www.eac.int/overview-of-eac>

¹⁰ EAC. 2013. East African investment guidebook published at

[https://d3n8a8pro7vhmxc.cloudfront.net/eatradehub/pages/948/attachments/original/1434448417/EAC_Investment_Guide_2013_\(1\).pdf?1434448417](https://d3n8a8pro7vhmxc.cloudfront.net/eatradehub/pages/948/attachments/original/1434448417/EAC_Investment_Guide_2013_(1).pdf?1434448417)

¹¹ World Bank. 2018. The Global Competitiveness Report 2018. Available at: <http://reports.weforum.org/global-competitiveness-report-2018/sub-saharan-africa/>

¹² World Bank. 2018. The Global Competitiveness Report 2018. Available at: <http://reports.weforum.org/global-competitiveness-report-2018/sub-saharan-africa/>

¹³ African Development Bank. 2019. East Africa Economic Outlook 2019: Macroeconomic Development and Prospects. Political Economy of Regional Integration. African Development Bank Group. Available at: https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/2019AEO/REO_2019_-_East_Africa_.pdf

¹⁴ Source: TradingEconomics.com.

¹⁵ TMEA n.d. Transport & Economic Corridor Draft Strategy

¹⁶ World Bank. 2018. The Global Competitiveness Report 2018. Available at: <http://reports.weforum.org/global-competitiveness-report-2018/sub-saharan-africa/>

¹⁷ Eberhard-Ruiz, Andreas, and Linda Calabrese. 2017. Trade facilitation, transport costs and the price of trucking in East Africa, at Overseas Development Institute. Available at: <https://www.odi.org/publications/10868-trade-facilitation-transport-costs-and-price-trucking-services-east-africa>

¹⁸ <https://www.cpmis.logisticsinformationplatform.com/ui/ReportViewer.html>. This site is password-protected but reports have been made into PDFs for consultation.

¹⁹ African Economic and Social Development Consultants. 2017. Validated Abridged Final Report, Logistics Performance Survey 2016, Shippers' Council of East Africa.

1.2 Trademark East Africa

The Trademark East Africa programme (Trademark, or TMEA) is a high-profile, multi-donor project that seeks to lift existing barriers to trade to bring about positive and sustainable change via a combination of regional and national initiatives and an investment of over \$500 million. TMEA is a large and complex programme, with national and regional dimensions and many sub-projects implemented across a number of countries.²⁰ During its Strategy 1 (S1), from 2010 to 2017, TMEA aimed to increase trade in East Africa through targeted infrastructure and trade facilitation investments to reduce transport time and costs. The programme also worked to enhance the business environment to enable greater use of the improved system. TMEA was launched in 2011 as a not-for-profit company limited by guarantee, funded by the UK's Department for International Development (DFID), which has commissioned the evaluation, and by cooperation agencies in Belgium, Canada, Denmark, Finland, Netherlands, Sweden, and the US. Funding reached \$560m USD. In 2017, the donors agreed to fund Strategy 2. The programme's high profile is amplified by current events in the UK and Europe around Brexit, highlighting increased interests in continued development work on trade.

1.3 The independent evaluation

DFID contracted OPM for an independent evaluation comprised of a set of studies. Several are completed and available from DFID; earlier deliverables mapped TMEA's 200+ projects²¹; examined project-level outputs and outcomes for 60 sampled projects²²; and carried out a number of studies: a formative evaluation of the ports and border posts²³; and an institutional and organisational assessment²⁴; a preliminary poverty assessment²⁵; and a relevance and sustainability assessment.²⁶ Preliminary findings from these deliverables were summarised in a dedicated report.²⁷ These inform the present evaluation deliverables and are cited throughout this report.

1.3.1 Purpose of the evaluation

The overall evaluation has two specific purposes:

- **Accountability:** Assessing TMEA processes, results, and overall value in an independent and impartial manner consistent with generally accepted principles and standards for professional evaluation.
- **Learning:** Identifying and feeding lessons learnt into the management of the remainder of the current programme and the design of any potential continuation of the TMEA programme, as well as future regional trade integration programmes.

In addition, the terms of reference (ToRs) also identify four core evaluation objectives, described here:

1. Test the **theory of change (ToC)**, assessing all causal links and the robustness of underlying assumptions (including links between trade, growth and poverty reduction), and adjusting the ToC²⁸ to serve as a reliable guide to interpret the programme and to make programme improvements.
2. Analyse and, to the extent possible, measure: the regional integration programmes' **impact** on regional trade, growth and poverty (and on the various stakeholders – in particular on men and women separately, poor and vulnerable groups, as well as traders and consumers); and **sustainability**.
3. Assess the **effectiveness** of the TMEA programme, including organisational effectiveness, and whether the programme represents **value for money (VfM)**.
4. Throughout, identify **lessons learnt relevant beyond TMEA**, i.e. insights on enabling and constraining factors, critical actions and gaps which would be generalisable to future programmes or to other contexts.²⁹

In addition, the evaluation contributes to the body of evidence on the effects of trade programming in line with a 2017 Learning Review carried out by the Independent Commission for Aid Impact (ICAI) that examined the use

²⁰ This includes text from the Independent Evaluation Inception Report, November, 2016, where information remains the same.

²¹ OPM: Otter, Thomas and Rasulova, Saltanat. Workstream 2; Deliverable 2A. Preliminary Output Assessment. 31 October 2017

²² OPM: David G.V Smith, Joel Moktar, Timothy Hobden, Theo Sands, Antony Wahome and Caroline Raes. Workstream 2: Deliverable 2D: Effectiveness and Outcome-level Evaluation SO2 and Deliverable 2E: Effectiveness and Outcome-level Evaluation SO3 Revised Draft. January 2019

²³ OPM: Ian Scott, Philip Lacey, Peter Omondi, Godfred Shuma, Thomas Otter, David Smith, Alex Hurrell and Saltanat Rasulova. Strategic Objective 1. Deliverable 2C: Effectiveness and outcome-level evaluation And Deliverable 3A: Consolidated Formative Evaluation of Ports and OSBP projects. December 2018

²⁴ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

²⁵ OPM: Neil McCulloch, Sebastian Silva-Leander, Chris Hearle, Alastair Haynes. Preliminary Poverty Assessment. 7 June 2017

²⁶ OPM: Thomas Otter with support from Robert Kirk, Peter Omondi, Chris Hearle and David Smith. Preliminary Relevance and Sustainability Assessment. (forthcoming)

²⁷ OPM: David G.V. Smith, Alex Hurrell, Patrick Ward and Saltanat Rasulova. Workstream 6: Deliverable 6B/2F. Summary of Preliminary Evaluation Findings. Revised Report (forthcoming)

²⁸ Now, the S2 ToC, rather than that of S1.

²⁹ All four studies identify and discuss lessons learnt (objective 4), while the objective 1 is examined most closely in the Performance Evaluation, where sustainability (objective 2) and effectiveness (objective 3) are also objects of focus. The TGIS and PGIS look at impacts (objective 2) and sustainability, while the VfM assessment focuses on value for money (objective 3).

of research and evidence-based decision-making to improve outcomes in programming for transformational economic development in Africa.³⁰ The study reviewed DFID's central and country-level practices and progress in making use of learning, finding some strong practices at central DFID levels but calling the quality of in-country diagnostic work variable. The study noted that 'monitoring and evaluation practices were not strong enough to support and learn from the level of experimentation that is underway' across the programmes reviewed. The report also notes that most programmes lack 'an explicit approach to economic inclusion and to monitoring whether marginalised groups were being reached.' The evaluation reports provide important evidence about some of these issues specifically for TMEA's programming, and recommendations for future directions.

While an implicit goal at inception was to provide key inputs for decision-making for follow-on programming, due to a challenging inception phase and the tragic loss of the independent evaluation team lead, the evaluation was unavoidably and significantly delayed. Timing was pushed forward to finish in 2019, with the understanding that deliverables should serve the accountability function and, to the extent possible, the learning purpose as well. DFID and other donors decided to continue funding TMEA for an additional six years, from 2018 to 2023. As a result, the evaluation purpose is to capture TMEA processes, results, and value relative to the scope and potential of its original design and funding. Where possible, the evaluation products provide lessons to inform TMEA's ongoing work, and for efforts beyond TMEA in trade and regional integration. The evaluation team acknowledges the significant and important learning that TMEA have already undertaken and put into action for their current S2 activities.

Given these circumstances and the focus on accountability, the chief audiences for the evaluation are DFID London, the Africa Regional Department, DFID Country Offices in East Africa, the trade team, and parallel audiences from among TMEA donors. TMEA is also an important audience for insights from S1 for implementing S2. Secondary audiences include other trade programmes for whom TMEA's experience could be instructive.

1.3.2 The objectives of the Performance Evaluation (PE)

The objectives of the PE are the following:

- Testing the TMEA ToC (assessing the causal links and the robustness of underlying assumptions),
- Assessing the effectiveness of the TMEA programme (outcomes and organizational effectiveness)
- Identifying lessons learnt for TMEA and beyond (including insights on enabling and constraining factors, critical actions and gaps which would be generalisable to future programmes or to other contexts.)

The PE design is multi-faceted and mixed method, to address the broad and complex nature of TMEA programming. The PE answers HEQ2 and HEQ5, focusing on effectiveness at outcomes levels, and recapping the evaluation's response to HEQ1 on effectiveness at the project and output levels. The PE traces outcomes for a selection of specific components within the three strategic objectives (SOs) and answers those DEQs not already fully answered (see Annex D for the list) around sustainability and implementation issues.

1.3.3 Evaluation Criteria

The Organisation for Economic Co-operation and Development's Development Assistance Committee's (OECD/DAC) evaluation criteria that are widely used in development evaluations. The criteria are relevance, efficiency, effectiveness, impact, and sustainability. The current deliverables focus on the criteria³¹ as follows:

- The **Performance Evaluation (PE)** traces S1 achievements and answers questions on ToC, coherence, and coordination, serving as an input for the studies that follow. (Effectiveness, Sustainability, Relevance)
- The **Trade and Growth Impact Study (TGIS)** examines whether outcomes have led to trade impacts, through a range of economic data and econometric and modelled analyses. (Impact, Sustainability)
- The **Poverty and Gender Impact Study (PGIS)** comprises uses qualitative and quantitative data from households and communities near and far from trade corridors, to assess potential³² impacts related to TMEA. (Impact, Sustainability)
- The **Value for Money Assessment (VfM)** reviews TMEA expenditures and outcomes to assess the 5 E's of the intervention, primarily based on programme financial data and interviews. (Efficiency, Effectiveness).

³⁰ Independent Commission for Aid Impact (ICAI) 2017. DFID's approach to supporting inclusive growth in Africa. A learning review. June 2017. UK: London, pp. 28, 32.

³¹ The final set of reports bundles deliverables from the original contract in a manner that is different from the original terms of reference (ToRs). For details on differences from the original ToRs, please see Annex A for the original ToRs, Annex B for the 2019 contract amendment, and Annex C for a discussion of differences. For details about evaluation elements and the TMEA results chain, and the questions answered by each study, see Annex D Evaluation questions, and Annex F Methods.

³² This study is in line with the literature around the effects trade may have on poverty but does not attribute to TMEA any effects found. It contributes to the evidence base on trade and poverty. The PGIS examines effects of TMEA's direct projects with poor households, communities, and associations.

1.4 Evaluation questions

The PE report addresses the following evaluation questions, primarily from HEQ2 and HEQ5.³³

Table 1: HEQs and DEQs to be answered in the Performance Evaluation

HEQ2: To what extent has TMEA been effective in achieving expected intermediate outcomes and to what extent has TMEA programme been effective in contributing to achieving programme strategic outcomes? Did the programme bring about any unintended outcomes?
DEQ2.1 To what extent has TMEA contributed to reducing corridor trade times and increasing corridor volumes?
DEQ2.2 To what extent has TMEA contributed to increasing ease of trading across borders?
DEQ2.3 To what extent has TMEA contributed to improving business competitiveness?
DEQ2.4 Has TMEA caused any unintended outcomes? What are they and who has been affected?
HEQ5: How robust and verified are the causal links and assumptions in the ToC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?
Programme relevance: ToC causal links and assumptions
DEQ5.1 To what extent are the causal links and assumptions underpinning the ToC evidence-based or verified?
DEQ5.3 To what extent does the programme support EAC regional trade development priorities?
DEQ5.4 How have changes in policy and in the political economy in the region impacted on the programme or on its relevance?
DEQ5.5 Do TMEA interventions complement other ongoing initiatives (both government and private sector)?
Coherence and coordination
DEQ5.6 What are the strengths and weaknesses of the working model observed to date?
DEQ5.7 Is the complementarity and coordination between national and regional levels optimal throughout all programme components and activities?
DEQ5.8 To what extent does the TMEA model bring greater results than the sum of its parts? How could this be strengthened?
DEQ5.9 Is using one organisation – a not-for-profit company – the best vehicle for impact on trade, and on poverty reduction through trade? What are the strengths and weaknesses of this approach?
DEQ5.10 To what extent are the programme’s governance arrangements leading to the delivery of high quality and timely outputs?
DEQ5.11 Is the operational model at donor level appropriate and efficient for delivering TMEA? What are the key enablers which need to be preserved, and what are the remaining constraints arising from donors’ systems?
DEQ5.12 Did TMEA align with country systems and agencies in an effective manner for ownership, and for impact? How could this be strengthened?
DEQ5.13 Are the focus and activities of TMEA consistent with, and additional to, those of others’ development programmes in the region? To what extent has the programme facilitated improved coordination?
DEQ5.14 What sorts of approaches have been more successful in working with regional institutions in Africa?
Sustainability
DEQ5.17 What benefits (both social and financial) of the programme are likely to be sustainable and would continue with or without TMEA (staffing and funding)?
DEQ5.20 How are stakeholders engaged through the programme and beyond its life, and how do they take lessons learnt into account?

An evaluation question about the beneficiaries of output-level effects was not fully answered in earlier deliverables but represents a key concern about those who might have been affected. Additional analysis is included in the PE to ensure it is completely answered. Beneficiaries are described in each section and, where the evaluation saw negative effects, these are discussed. Findings for the question are summarised in the Executive Summary.

Sustainability
DEQ1.4 Who were/are the main beneficiaries of the outputs? Are there organisations or groups of people who are negatively affected by the outputs?

1.5 Timing

The timeline for the evaluation studies is detailed in Annex E Design and Work Plan. The PE team was in the field from November 2018 through March 2019. An updated timeline is shown below, with estimated dates for learning workshops. These also function as dissemination. The VfM team have planned a verification exercise with TMEA in August 2019, while TMEA will comment on the other reports in written form rather than in a verification workshop in person, to ensure that the evaluation process provides VfM. Learning workshops will also be combined where possible, following successful delivery of evaluation deliverables.

³³ All evaluation questions, including those answered in earlier deliverables and for TGIS, PGIS and VfM studies, are at Annex D, as amended over the life of the contract.

Table 2: Summary schedule – 2018 to 2019

	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Performance evaluation											L			
Trade and growth study											L			
Poverty and gender study											L			
VfM assessment			V							V				

Equals review is shown in purple, fieldwork and reporting in grey, and DFID and TMEA review in green. Verification exercises are marked by a V and Learning workshops with an L.

In development evaluations of complex programming and those measuring impacts through non-experimental designs, analyses rely on source triangulation, respondent validation, consideration of alternative explanations, making explicit connections between findings and conclusions, and auditable documentation.³⁴ Each draft report is reviewed by DFID and TMEA, and by DFID’s quality control function, EQUALS. Additional fieldwork by skype or telephone may be necessary following review and verification exercises, and the team has built in a “cushion” before the end of the no-cost extension to December 2019.

1.6 Dissemination

OPM will produce a brief communication product – 20 pages – for the use of DFID, other donors, and TMEA partners as part of dissemination work. This product will cover the responses to the HEQs as enumerated above, with a focus on the final answers provided in the Phase 2 evaluation deliverables. This will be complemented with dissemination of findings in face-to-face events in Mombasa in December 2019. An internal learning event with TMEA staff and another with the Board, Council and National Oversight Committee (NOC) chairs will cover the PE, TGIS and PGIS studies as part of the Board meetings and TMEA Staff Retreat. The VfM study will not be included for reasons of timing and the internal nature of those findings. OPM will work with DFID and TMEA to develop the event around learning goals so that, beyond any presentations of results, participants will be engaged in discussing together how to take the evaluation recommendations forward in Strategy 2. Further external dissemination will take place in early 2020 following publication of final reports, including through traditional and social media channels.

³⁴ Stern, Elliot, et al. 2012. Broadening the Range of Designs and Methods for Impact Evaluations. Report of a Study Commissioned by the Department for International Development. P. 70, inter alia.

2 Performance evaluation (PE) design and methods

2.1 Background

This chapter lays out the design and methods the PE used to evaluate TMEA; further detail on methods is available in Annex F. This design was approved in November, 2018 in the Independent Evaluation Design and Work Plan (Annex B), building on the ToR (Annex A) and Inception Report (2016) but also superseding these in light of the evolution of TMEA and DFID's requirements for the evaluation.

As a theory-based evaluation, the PE requires a thorough understanding of TMEA's ToC against which to compare outcomes and the mechanisms around expected and actual change. A simplified version of the three strategic objectives and the programme intermediate outcomes (PIOs) that feed them is shown in Figure 1. SO1 comprised hard infrastructure at two ports and 15 border posts, and soft infrastructure support to improve procedures and processes. SO2 included interventions at government levels including working with the EAC and with country-level systems to facilitate trade processes such as permits and setting standards and strengthening national and regional systems to eliminate Non-Tariff Barriers (NTBs). SO3 worked with private sector and civil society actors to strengthen their trade advocacy, with women and grassroots-level traders and businesspeople, and with the logistics industry.

TMEA's documented ToC is at a very high and conceptual level.

At the operational level, individual project results chains are not systematically linked up to programme outputs, outcomes and SOs. The TMEA Results Framework (RF) does provide a structure that attempts to link these levels. Drawing on the ToC and the RF, the previous phase of the independent evaluation mapped project level outputs for the more than 200 projects carried out by TMEA,³⁵ and the PE team used this process to build an understanding of the programme logic. Based on this understanding, in 2016-17 the evaluation team sampled 60 projects³⁶ and undertook a quality assessment of these, against common criteria: relevance, efficiency, effectiveness and sustainability. The findings further refined the team's understanding of the programme, and how the ToC and results chains were operationalised into activities to reach programme goals. These results are can be accessed in full in the relevant reports,³⁷ and are summarised in the PE in each answer to HEQ2 on effectiveness.

For the PE, the evaluation team worked to understand the intermediary logic behind how TMEA understood its clusters of projects to lead to the PIOs. This built on the earlier findings that "SO1 and SO2 projects and their likely results are more comprehensively built around pathways of change³⁸ and appeared to involve more systematic thinking about causal packages, as compared to SO3 projects³⁹, making it somewhat easier to unpack the causal mechanisms for SO1 and SO2. The evaluation team ultimately analysed all of the programme components in the ToC to answer HEQ5 and sampled these based on a set of selection criteria (please see below, and Annex G) to answer HEQ2. The PE team examined those hypothesised mechanisms and causal packages, tracing them in context to characterise the breadth of TMEA interventions for each pathway. This provided the foundation for the PE. The team has also worked to understand how and when TMEA adapted to changing opportunities and challenges.

Figure 1: TMEA's S1 Strategic Objectives and Programme Intermediate Outcomes

SO1 Increased physical access to markets

Hard and soft infrastructure investments at:

- 1.1 Mombasa Port
- 1.2 Dar es Salaam Port
- 1.3 One-stop Border Posts (OSBPs)

SO2 Enhanced ease of trading across borders

- 2.1 Strengthened EAC regional trade integration capacity
- 2.2 Effective trade systems, agencies and procedures (ICT for Trade)
- 2.3 Efficient national and regional NTB mechanisms
- 2.4 Harmonise product standards.

SO3 Improved business competitiveness

- 3.1.1 Private sector- and civil society-led policy formulation (advocacy)
- 3.1.2 Improved processes for traders, especially women
- 3.2 Strengthened export capabilities
- 3.3 Effective and efficient logistic services

³⁵ OPM: Otter, Thomas and Rasulova, Saltanat. Workstream 2; Deliverable 2A. Preliminary Output Assessment. 31 October 2017

³⁶ See sample selection, methods and findings in the two resulting studies: OPM: David G.V Smith, Joel Moktar, Timothy Hobden, Theo Sands, Antony Wahome and Caroline Raes. Workstream 2: Deliverable 2D: Effectiveness and Outcome-level Evaluation SO2 and Deliverable 2E: Effectiveness and Outcome-level Evaluation SO3. Revised Draft. January 2019 and OPM: Ian Scott, Philip Lacey, Peter Omondi, Godfred Shuma, Thomas Otter, David Smith, Alex Hurrell and Saltanat Rasulova. Strategic Objective 1. Deliverable 2C: Effectiveness and outcome-level evaluation And Deliverable 3A: Consolidated Formative Evaluation of Ports and OSBP projects. December 2018

³⁷ OPM: David G.V Smith, Joel Moktar, Timothy Hobden, Theo Sands, Antony Wahome and Caroline Raes. Workstream 2: Deliverable 2D: Effectiveness and Outcome-level Evaluation SO2 and Deliverable 2E: Effectiveness and Outcome-level Evaluation SO3 Revised Draft. January 2019 and OPM: Ian Scott, Philip Lacey, Peter Omondi, Godfred Shuma, Thomas Otter, David Smith, Alex Hurrell and Saltanat Rasulova. Strategic Objective 1. Deliverable 2C: Effectiveness and outcome-level evaluation And Deliverable 3A: Consolidated Formative Evaluation of Ports and OSBP projects. December 2018

³⁸ Where project results at one level of a pathway of change can most likely contribute to results at the next level in the same pathway of change.

³⁹ OPM: Otter, Thomas and Rasulova, Saltanat. Workstream 2; Deliverable 2A. Preliminary Output Assessment. 31 October 2017.

2.2 Evaluation Framework

To serve the accountability purpose and to capture lessons learnt, the PE tested the ToC (causal links and the robustness of assumptions), assessed programme effectiveness (including both outcomes and organisational effectiveness), and identified lessons learnt (insights on enabling and constraining factors, critical actions and gaps which useful for other programmes or contexts.) The design is multi-faceted and mixed method, to address the broad and complex nature of TMEA.

The PE answered HEQ5 questions on relevance, sustainability, and implementation by testing the validity of the ToC, coherence with national and regional trade priorities, coordination of operations, sustainability, and approaches for working with regional institutions. This involved a traditional mixed-method design, and included document review, in-depth interviews, and site visits.

The PE used Contribution Tracing (CT) to answer HEQ2.⁴⁰ The design for this part of the PE is innovative and warrants further explanation. With 200 TMEA project activities it is almost certain that some will correlate with improvements in macroeconomic data and intermediate outcomes, but correlation does not prove causation. Counterfactual designs are not appropriate as we have no 'alternative East Africa' to act as a control or comparison. The PE team identified Contribution Tracing (CT) as a suitable non-counterfactual design for examining TMEA's effectiveness and the achievement of intermediate and strategic outcomes.

CT strengthens Process Tracing (PT) – an impact evaluation design that enables strong causal inferences to be made within a single case by 'tracing' the implications of causal mechanisms in a results chain – by considering the **probative value** of evidence for each link in the chain. This is a legal term expressing the relevance of evidence to prove or disprove an element of a case. In CT, the probative value of the evidence is calculated to consider the extent to which evidence strengthens or calls into question a causal claim. The method makes judgements about the likelihood of observing each piece of evidence if the causal claim is true as a check on bias, and asks "how likely is it that some alternative mechanism has generated this evidence?" to provide a consistent way of comparing many different types of evidence. CT is described in detail in Annex F, including the statistical and procedural steps used. As a theory-based evaluation method, contribution tracing requires in-depth understanding of the ToC. Where these were not part of design and implementation, or were superseded by events, the evaluation team had to reconstruct them to be able to undertake the analysis.

Traditional data collection methods – interviews, group discussions, site visits, and secondary documents and data – feed the analysis for HEQ2 and HEQ5. Triangulation – drawing on and weighing sources internal and external to TMEA – was used to minimise bias, quality-assure data and support conclusions based on the range of findings.

2.2.1 Stakeholder involvement and transparency

The delay in the evaluation process had an alienating effect on TMEA stakeholders, and OPM's initial task in re-starting the evaluation included presenting the design transparently and listening closely in an effort to be responsive to any concerns. TMEA staff and leadership expressed concerns about the timing and burden of the evaluation, asking the team to finish quickly, ideally before the end of 2018. It was not possible to accommodate that request given the iterative revisions to the Design and Work Plan (Annex B), but the team worked to be as efficient as possible during fieldwork. No changes were made to the PE design based on TMEA concerns.

The team began staff interviews by asking about their "proudest achievement", a technique used in Appreciative Inquiry based on the idea that key informants in an institution or programme are more receptive and responsive when approached about how to build on successes, than when asked to identify system failures.⁴¹ The entire team used this method, for consistency, and it was a positive way to broach the evaluation questions for the new design. OPM continued close contact throughout fieldwork, allowing for informal "check ins" with TMEA. When concerns were raised, such as dissatisfaction with the design in Tanzania or with processes in Rwanda, OPM reached out to talk over the issues, ease unnecessary burdens and gain cooperation on one or another site visit or interview.

TMEA teams were over a year into S2 during fieldwork, so interviews relied on recall. The evaluation was burdensome on some staff, particularly the HQ Results team, country directors, and component leads. The up-front investment in relationships with stakeholder helped to ensure engagement and responsiveness, but some repeated requests for information or specific data went unanswered.

⁴⁰ Please see Annex G on the sample selection for detail.

⁴¹ Coghlan, Anne T., Hallie Preskill, Tessie Tzavaras Catsambas. 2003. An Overview of Appreciative Inquiry in Evaluation. *NEW DIRECTIONS FOR EVALUATION*, no. 100, Winter 2003 © Wiley Periodicals, Inc.

The evaluation team proactively sought to mitigate risks of biases and conflicts of interest; greater detail on this is contained in Annex F on Methods. The evaluation design relies on triangulation, team experience and expertise, and shared scrutiny of the evidence, as a means to quality assure our conclusions. The report is also validated through the review process with DFID and TMEA, and quality assured by OPM specialists. The evaluation team leader is a member of relevant evaluation networks and subscribes to their principles of professional behaviour and works to ensure the team maintains those standards.

2.2.2 Data collection

Sources included documents (Annex H, Bibliography – secondary data), site visits (primary data), and 350 interviews (primary data). Annex F, Methods, contains further details including the sampling strategies. Interviews were with TMEA, partners, and external stakeholders with perspectives on the work TMEA undertook. With all non-TMEA respondents, we asked permission to interview them, explained how the results would be used, and offered them confidentiality to gain their informed consent and their candour. The team treated all interview data as confidential – it was not shared outside the team – and stored on private servers under password to ensure the security of the data. Identifiable data about respondents was excluded from the report, up to and including gendered pronouns and information in their responses that might have identified them. The same exclusions were taken for members of TMEA staff. However, since some knowledge could come from only a handful of team members, the team sought ways to represent the data that would maintain their confidentiality as well, and excluded sensitive information respondents shared in all cases. The ethical and methodological study parameters were explained to the full team and the team leader reviewed notes daily to discuss deviations immediately, as a quality assurance measure. We hoped to model best evaluation practices for the respondents with whom we interacted.

Open-ended interview guides were built by the team and based on the HEQ2 and HEQ5 evaluation questions. After the first three days of interviews, the full team met to critique and revise the content, wording, sequencing, and scope of the guides. The team was conscious of the need to elicit nuanced opinions about process, outcomes, inhibitors, and challenges. The guides flowed from less to more sensitive questions. The team are experienced in building rapport with confidentiality, open body language, and language. Please see the interview guides at Annex I.

The team sought varied viewpoints for each question and component. Data collection was planned for four countries (Kenya, Rwanda, Tanzania and Uganda), as in the Design and Work Plan (Annex E), but the PE team was able to add an additional set of interviews in Juba and at the border post in Nimule at very low cost, bringing the total number of countries to five. The diversity of respondents allowed triangulation across stakeholder groups, including disinterested users of systems and infrastructure. The evaluation team included questions for HEQ5 and for HEQ2 (results) on every HEQ5 instrument – that is, on all instruments for the various respondent types (as listed in Table 3 below). These were tailored for each respondent – a TMEA staff member or partner who worked on an ICT for Trade intervention, for example, was queried about results for that intervention, and, as applicable, about knock-on effects on, for example, OSBPs or export capability. In this way, the HEQ5 interviews served as introductions to results that were later explored more deeply in CT case studies, involving separate interviews (often more than one with given individuals), using the separate instrument for that purpose. (The next section discusses the CT sample of individuals).

The international consultants conducted fieldwork visits in Rwanda, Uganda, and Tanzania twice each. Between the first and second visits, the team met in Nairobi to review coverage, and prioritise data collection for the second visit. Fieldwork was undertaken in Kenya over one longer visit, given the need also to reach the regional elements of programming that were housed there. Each team member 'specialised' in one SO and one country (i.e., visiting twice), with the team lead providing backup coverage across the SOs, having visited all four countries. National team members in each site pursued appointments with the partners, making use of their networks, and identified private sector firms that were either unconnected with TMEA or that were Authorised Economic Operators (AEOs). These team members continued interviewing after the shorter visits by the international team, based on prioritised lists developed by each country team 'specialist', as part of VfM strategies for the evaluation.

The evaluation team developed a coding framework to capture convergence and divergence. The team also made use of extensive TMEA data and reports from regional and country levels, along with data that were able to be sourced from government, private sector, and civil society partners. Care was taken to ensure systematic and rigorous triangulation across data sources.

For HEQ5, the team looked broadly across the full range of components, while for HEQ2, the team conducted an in-depth look at components for which TMEA claimed important outcomes (For more information on sampling from among components for CT, see section 2.2.3 Contribution Tracing Sample and Methods, and Annex G).

For HEQ5, sampling of individuals was purposive within each country, with an attempt to reach partners from all components in each country. In each visit, TMEA staff planned an initial set of interviews, including those within TMEA, which served as entry points to discuss projects and components; uncover key actors, reports and potential data sources; compare that to the project database and components; and ensure coverage of the components. With over 200 projects in S1, the evaluation did not expect to visit all of these, but rather worked within the evaluation team to identify projects and groups of projects that should be covered, and to pursue those interviews. We sought 1) to follow up on projects that had been reviewed in the earlier evaluation projects, 2) to cover each of the components in each country where they were active with sufficient interviews to cover each evaluation question, 3) to speak with TMEA, partner and beneficiaries for each component, 4) to visit infrastructure projects, each of the four country offices, and the Arusha office, and 5) to fill gaps identified in preceding interviews.

Visits to the ports and border posts used blended sampling, including visits arranged by TMEA and those sought by the team independently, in order to cover a cross-section of interested stakeholders, including private sector users of these facilities. Team members visited Mombasa Port three times and Dar Port twice, and Busia, Mirama Hills, Kagitumba, Nimule and Elegu OSBPs during fieldwork. This is in addition to port and border post visits carried out by the PGIS field team, but since the timings were close together, the PE team was able to make some use of PGIS field visit notes to supplement information for this report, particularly around Women and Trade interventions and those in the Export Capability component. The sample of interviews in the following table represents only those undertaken specifically for the PE.

Table 3: The sample: Overall PE respondents

	HQ & EAC ⁴²	KE	RW	SS	TZ	UG	Totals
Management, results, and leadership	19	3	1	1	2	3	29
Trademark component teams	37	7	4	1	8	3	60
Government partners	14	38	18	5	14	13	102
Private sector partners	2	23	12	5	10	12	64
Civil society partners	2	2	5	4	2	11	26
TMEA donors	6	5	2		2	4	19
External donors	7	9		1		6	23
External private sector firms/individuals	1	6	3	1	10	6	27
Totals	88	93	45	18	48	58	350

The evaluation team also visited the Arusha headquarters of the EAC twice, while other interviews were at organisation or agency offices in capital or major cities.

There were more men than women in the sample. Among all respondents, 239 were men and 111 were women. Trademark leadership was somewhat more balanced with 17 men and 12 women. Among East African government respondents, 77 were men and 25 women. Donor respondents (including non-TMEA donors) were represented by 26 men and 16 women, whilst among private sector and civil society partners, 60 were men and 30 women. The private sector respondents who were not involved with TMEA but kindly responded to our interview requests included 22 men and five women. These gender differences reflect the trade sector, which is traditionally populated by more men than women.

⁴² HQ and EAC are combined, reflecting the regional HQ work, as with regional apex bodies; most are headquartered in Nairobi.

2.2.3 Contribution Tracing Sample and Methods

To answer HEQ2 on effectiveness and outcomes, the evaluation selected a sample of outcomes to be investigated using Contribution Tracing (CT), per the criteria accorded in the Design and Work Plan in November, 2018 (the Design and Work Plan is at Annex E, and the full sample document from February 2019 based on these criteria and approved in that month, is at Annex G.) The criteria for selecting cases for the CT cases were as follows:

1. For which components (or results chains) do TMEA claim results, and where (i.e., at regional or national level(s))? For each result for which TMEA claimed credit, we would also want to see results chains where activities, outputs and outcomes were largely successfully implemented.
2. Was the (claimed) maturity and potential scale of the impact sufficient to be detected by the evaluation?
3. Does the results chain warrant investigation, in terms of scale? Components with materialised, detectable impacts that relate only to small interventions might be disqualified here.
4. Are data likely to be accessible, both within and outside TMEA, to substantiate the contribution claim?⁴³
5. Which cases will best answer each of the three SO-related DEQs (under HEQ2)?

The fifth criterion deals with the mix of cases, rather than just the selection of individual cases: the evaluation needed to select a set of cases that could answer the three DEQs on effectiveness *by strategic objective*: SO1 on reducing corridor trade times and increasing corridor volumes; SO2 on increasing ease of trading across borders, and SO3 on improving business competitiveness.

Some TMEA components are more mature in their achievement of outcomes than others. The selection criteria avoids spending considerable resources to capture depth on components that the evaluand recognises *a priori* did not achieve their outcomes. Selecting those which TMEA asserts have made significant, measurable gains in line with the criteria above allowed the PE to trace and substantiate those claims, assess their reliability, understand the dimension and implications of those that are substantiated, and draw lessons learnt from the detailed case experiences. For SO1, the evaluation considered where there were potentially important gains in reducing corridor trade times and/or increasing corridor trade volumes (DEQ2.1). For SO2, cases were selected where there were potentially important gains in increasing ease of trading across borders (DEQ2.2). Where this is substantiated, the evaluation team examined the magnitude of that change in context and used interpretation from trade experts on the evaluation team. For SO3, the selected exporter capability work was examined for its effects on improved business competitiveness (DEQ2.3).

The evaluation team selected the cases in Table 4 and presented these to DFID in February 2019 as part of an iterative review process to confirm the coverage and quality of the selection.

Table 4: The CT case studies

	Notes about scale of potential outcomes
1.1 Mombasa Port	Kenya only
1.3 OSBPs	A selection of Northern Corridor OSBPs, including Busia, Mirama Hills, and Kagitumba
2.2 Effective trade systems, agencies, and procedures (ICT for Trade)	A sub-selection within the ICT for Trade interventions covered the countries with comparable interventions; all four countries.
2.3 Effective NTB mechanisms	Rwanda was excluded from this case, as the NTB SMS system did not take root.
2.4 Effective EAC trading standards	Tanzania was excluded, as their participation in Standards activities was limited.
3.2 Export capability	Primarily small projects, but indicators that roll up gains from many smaller projects may give a sense of scale. All four countries.

TMEA claimed significant results in each of these direct (rather than enabling) components, with results chains that had been largely successfully implemented. Each was deemed to have mature outcomes that would be detectable, and all but Export Capability were deemed to warrant evaluation because they met the scale requirement (Criterion 3 above). Export Capability was included, nonetheless, because of the coverage requirement in Criterion 5. Data accessibility was mixed, but ultimately provided enough information, some of it caveated, to emerge with evaluative judgements.

⁴³ The evaluation team assumed data quality and the ability of external corroborating data, in addition to TMEA's own data. While this was not always the case, the team assessed data quality and included this assessment in the report.

The CT cases were coded first on individual interview instruments by component and country, for a total of 18, which involved an additional 39 interviews with TMEA staff, using the CT instrument. Often, the team interviewed these individuals, or returned with further queries, multiple times to each respondent, because of the depth of information needed. These were complemented with 60 interviews with partners, private sector beneficiaries or interested parties, other donors and other sectoral actors, through which the team acquired additional data on the case, checked information from the interviews with TMEA actors, and/or inquired about alternative explanations. We also took advantage of data collected for HEQ5 to triangulate what we were told about the CT cases, and were in contact with an additional 15 government sources for data, outside of those we interviewed. With the exception of these 15, all the other figures in this paragraph are included in Table 3 figures, above.

As with the answers to HEQ5, the CT cases relied upon interviews, and document and data review. Evaluation team members worked to prioritise evidence requirements of the CT cases in the second visits to each country (and in the second part of the visit to Kenya), making use of national and international contacts for purposive and snowball sampling from among project and component actors and stakeholders, and users of the systems and infrastructure being analysed. The later country visits also focused on identifying and researching possible alternative explanations for outcomes being analysed with CT, in order to ensure coverage and balanced understanding. This involved querying the government agencies about their development partners and speaking with other donors outside TMEA to understand their contributions and identify possible alternative explanations. This was done for each CT case, and is discussed in the analysis in this report and in Annex J.

National team members continued interviews, particularly around CT cases, after the more expensive international consultants departed the country, which supported both VfM and gathering quality context-rich information. Evidence was considered within an analytical method that traces the causal pathways from activities and inputs, to outputs, to outcomes, and, where applicable, to impacts, identifying evidence at each stage and testing the links through critical analysis and presentation of the cases for debate.

2.2.4 Data quality and limitations

A number of limitations are common to studies of this type, and the team worked proactively to mitigate them:

1. The scope of TMEA's interventions is broad and has changed over time. Recreating the thought processes around theories of change and strategy from as long ago as 2010 based on respondents' recall is likely incomplete. The very sad loss of TMEA's SO1 Lead, George Wolf, in December 2018 also affected the evaluation, since his own thinking about programme strategy was clearly central to TMEA's intellectual history. Hearing from a range of respondents is one way the evaluation mitigated this challenge; the team also recognised this possibility early on, and placed importance on documentation, where it existed, of earlier thinking from the TMEA HQ and country teams, rather than on recall alone.
2. This is a large evaluation and complex evaluation. The ToRs required that the PE team examine 21 evaluation questions, ten components, in four countries plus the regional EAC programme and corporate programming. It is inevitable that there may be some gaps and that there may be insufficient quantity and quality of data to reach credible conclusions on all points. A comprehensive review of the draft report by DFID and TMEA has helped to identify these, but not all will be able to be resolved. Annex N highlights these gaps, which are more prevalent at baseline and at outcome levels, and the evaluation makes clear where there was insufficient evidence to reach conclusive judgement.
3. Some limitations reinforce each other, such as the significant scope of the present evaluation and the evaluation fatigue expressed at TMEA. TMEA and partners often shared pre-prepared presentations to save time responding to the multiple requests for evaluation interviews like ours. Interviews were scheduled for 60 minutes and it was often not possible to cover all of the evaluation questions in the time respondents were able to give. While respondents were gracious, the demands of the evaluation, and the extensive data and additional interview requests to inform the CT cases, were burdensome, particularly for TMEA and for their most important partners – revenue authorities, ministries working on EAC affairs, port authorities, and key private sector groups. Survey or evaluation fatigue in such cases has a cost in terms of VfM (lost time on task) and in terms of the quality of responses. Practiced responses might not be germane to the evaluation questions or may tend towards more superficial answers rather than thoughtful insights into processes, which the evaluation intended to elicit. To mitigate against this, the team limited interviews wherever possible, expressing gratitude and describing the usefulness of responses, respecting the time limits respondents placed on the interviews, gently interrupting presentations to return to interview questions, asking teams rather than individuals for follow-on data for the CT cases, and following up through email where respondents gave superficial or unclear responses. Responsiveness tapered off after the team left the region, and the evaluation often relied on TMEA's own leadership to help secure responses and additional data. The evaluation team has also noted where evidence is weaker, particularly in the CT cases.

4. Risks of bias are always present, including social desirability bias in which respondents seek to please the interviewers, at times in the hope that funding will continue; sponsor bias in which responses are conditioned by interviewees' independent perceptions of donors, donor countries, or of TMEA; and confirmation bias on the part of researchers, in which prejudgements about research findings cause the team or a team member to overlook contrary or unexpected findings. To mitigate against the first two, the experienced team attempted to build rapport to gain genuine and thoughtful responses. To minimise confirmation bias, the team actively challenged one another's ideas using the evidence gathered, as well as their sectoral and regional experience.
5. The evolving political economy in each country undermines simple responses to outcome questions, particularly since S1 ended almost two years ago. While that affords a period of time to be able to evaluate sustainability, it also introduces countless new variables as politics, bureaucracies, economies and societies undergo change, and can make it harder to evidence causal relationships. While not easy to mitigate, the team worked to maintain the focus on the evaluation questions and to limit the amount of contemporary information to consider. Nevertheless, it would be a wasted opportunity to not consider what has happened since S1 ended, and this information has informed some of the conclusions and recommendations around sustainability. Since HEQ2, for example, is such a key piece of the evaluation response, taking extra time to find data on how these outcomes evolved was deemed necessary and worthwhile.
6. Respondents were reluctant to speak about corrupt practices, though an awareness of these is essential to understand how transport systems actually function in the region. The team kept abreast of public developments in these issues at Mombasa Port, key agencies, and government leadership, in part to mitigate the closed reactions to questions about corruption in interviews. The issue, however, was mostly underground. As such, readers are cautioned not to forget the impact of the many types of corruption – on a spectrum, perhaps, from overt bribery to the ways governments can focus resources and attention on issues for personal or professional benefit – and how these impact trade and limit gains for marginalised people.
7. Significant documentary data came from TMEA itself. The team worked to triangulate and confirm this evidence with external views, however this was not always possible as international organisations' data was often not specific enough, public sector reports were found to be wanting, and government sources were reluctant to provide detailed data in many instances. There were important deficiencies in government data management and use. Documents and data were subject to critical team review by the team and data quality commentary is included where relevant.
8. Despite repeated requests, some data sets (TMEA data, as well as data they might have to request of their partners) were not being provided. During the review process, the OPM team continued to pursue these data to enhance the strength of findings and conclusions. Where these remained missing at the close of the evaluation process, the lack of key data is noted in the final report, and readers supported to understand the effect of their absence.

3 Answering the evaluation questions

HEQ5: How robust and verified are the causal links and assumptions in the ToC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?

The causal links and assumptions in the programme ToC are broadly robust and verified for ToC outputs, but less robust and verified at the level of outcomes, and then only for some components. The evaluation team examined the overarching programme ToC and some project results chains, reconstructing non-existent ToCs at component level in order to examine this question. Team members with particular expertise in infrastructure, trade facilitation, and business competitiveness – who had already been assigned to shepherd those data collection and analytical processes – re-created the TOCs through deep discussions with a range of TMEA and partner actors, asking how strategic decision-making took place through the life of S1 and critically assessing what was stated versus what was actually carried out. This included what TMEA respondents considered key assumptions, as well as those the evaluation team deemed necessary and pertinent. At the level of activities and outputs, the evaluation team was instructed to reconstruct and finalise these TOCs for use in the PE analysis on the basis of what actually occurred, rather than strictly on TMEA's high-level theoretic formulations, because recall would have been unreliable at this late date. The high-level TOC, which was all that TMEA formulated in its TOC documentation, served as the model against which the overarching programme was evaluated, but this could not be done with activities and outputs, given that there was no explicit TOC at those operational levels. The re-created TOCs by Programme Intermediate Outcome (PIO), as representations of what actually happened, also highlighted those assumptions which were absent from TMEA thinking and allowed a sharper focus on how TMEA team thinking about assumptions could have been stronger. TMEA respondents were asked to comment on the content of the ToC and the results chains, the degree to which assumptions materialised, and what kinds of challenges to those assumptions occurred during S1. While TMEA staff were able to speak in detail about the project-level results chains and about the challenges and successes in their projects, the absence of a documented process for review and updating their theories about mechanisms and causal packages was notable.

Partners were asked to comment upon whether their activities with TMEA went 'according to plan', to assess the degree to which the investments were undertaken with theory of change-type consideration of causal mechanisms, assumptions, and the effects of exogenous factors. Partners spoke about challenges that affected project success, often changes in government or other facets of the political economy that were simply insurmountable. In most cases, partners did not refer to mitigating risk or contingency planning, nor assumptions that might have materialised but did not. In the majority of cases, partners spoke to questions of relevance, alignment, and coherence with national and, often, regional strategies and priorities. TMEA's manner of working with government and other partners appears largely collaborative and demand-driven, within their mandate. Long-term relationships, working across related TMEA components and government agencies, creating space for partner ownership of outcomes was widely implemented, if more successful in some cases than others.

Sustainability remains a significant challenge. While governments of Rwanda and Uganda have important incentives (due to their land-locked positions) to institutionalise many of the system changes they worked on with TMEA, the incentives for the coastal countries appear less decisive. Government budgets are at times – but not consistently – officially changed to cover sustaining the systems. Counter incentives and other exogenous factors and interests at the Ports have limited the longevity of changes achieved during S1.

3.1 Programme relevance: ToC causal links and assumptions

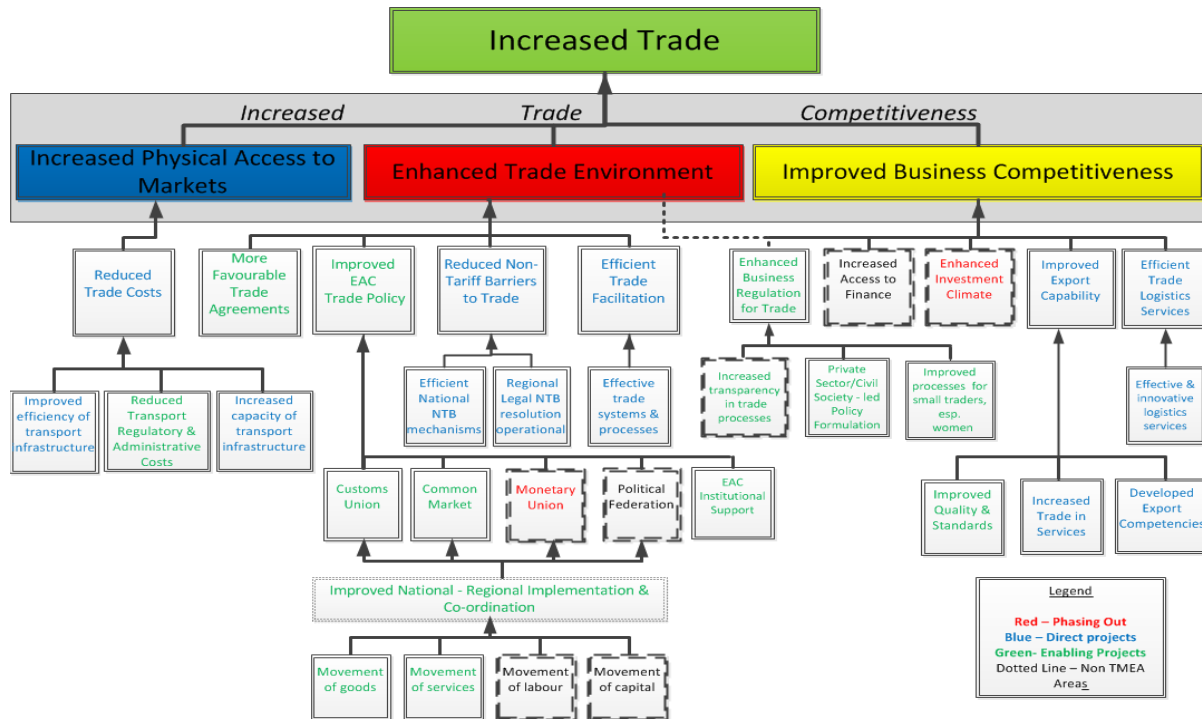
DEQ5.1 To what extent are the causal links and assumptions underpinning the ToC evidence-based or verified?

TMEA's Theory of Change (ToC) in S1 was insufficient as a guide to programming and as a check on the causal mechanisms underlying their strategy, though TMEA performed some ToC-type functions through different means – strategy documents, an evidence library, results chains at project level, and the Results Framework (RF). In order to determine the extent to which the causal links and assumptions underpinning TMEA's ToC are evidence-based or verified, the evaluation reconstructed TMEA's ToC, and examines TMEA's performance against its implicit component-level ToCs (see Annex J for details). The strengths and weaknesses of the implicit ToCs are summarised.

TMEA was launched before ToCs became a requisite part of programme planning and management in international development. As S1 progressed, TMEA developed strategy documents and a high-level ToC to

underpin their work. The TMEA headquarters updated its overarching ToC in 2014, a guiding document that remained in force until the end of S1 comprised of a visual representation of diagram (see in Figure 2) as well as an accompanying narrative that discussed aspects of TMEA’s work. The stated purpose of the ToC was to provide focus, reduce complexity, provide a framework for discussion and adjustment, inform stakeholders about the breadth and limits of change, highlight political processes, and build understanding of complexity.⁴⁴

Figure 2: TMEA Theory of Change, 2014



As noted in OPM’s mapping exercise,⁴⁵ TMEA’s ToC was developed in 2014 and did not involve strategic planning ‘with a view to establishing an expected causal link between TMEA activities and projects and the overall goal of increasing trade’⁴⁶. The ToC describes those elements deemed necessary to increase trade in the region – but does not specify how elements of TMEA’s own programme (components or projects) are intended to work together to meet strategic or intermediate goals. It does not model or explain ‘how resources are being transformed into outputs which contribute to the achievement of an outcome and where the outcome usually produces effects inducing or progressing processes of change’.⁴⁷

Rather than setting out assumptions about how a set of proposed activities, taken together, would achieve certain intermediate and ultimate results, this ToC lays out a comprehensive landscape of necessary elements for an increase in regional trade. In effect, the ToC is designed as if for all sectoral actors who might intervene in a selection of these elements to support trade in the region. TMEA is one such interested implementer, and the rest of the ToC narrative document discusses which elements of TMEA will attempt to address.

The 2014 process to revise the ToC highlighted programming outside TMEA’s mandate, which was stopped or minimised; and from that time forward, results chain thinking became part of project design and the Project Appraisal Review (PAR) process, with project teams required to explicitly link their proposals to the overarching ToC. By S2, working with ToCs is an established part of project practices. However, for the S1 ToCs and results chains, the evaluation team found key gaps in their quality and coverage, and noted that these were not used as a ‘living document’ to guide programming by testing causal linkages and assumptions.⁴⁸ There were also no ongoing updates to the document after its presentation in 2014.

⁴⁴ TMEA, “Propositions underpinning TMEA’s strategy,” May, 2014. Provided by TMEA.

⁴⁵ OPM: Otter, Thomas and Rasulova, Saltanat. Workstream 2; Deliverable 2A. Preliminary Output Assessment. 31 October 2017

⁴⁶ The accompanying narrative makes clear that while increased trade is theorised to result in economic growth, which in turn is theorised to result in poverty reduction, TMEA saw economic growth and poverty reduction as further along the results chain, and did not expect to contribute to these measurably over the life of S1

⁴⁷ As cited in Deliverable 2A. Preliminary Output Assessment. See, for example: Funnell, S. and Rogers, P. (2011) Purposeful Program Theory: Effective Use of Theories of Change and Logic Models, John Wiley & Sons, San Francisco, CA.

⁴⁸ Stein, Danielle, and Craig Valters. 2012. Understanding Theory of Change in International Development. The Asia Foundation, The Justice and Security Research Programme. Available at: http://www.theoryofchange.org/wp-content/uploads/toco_library/pdf/UNDERSTANDINGTHEORYOFChangeSteinValtersPN.pdf

TMEA explicitly recognised it should focus on areas of its comparative advantage. However, the resulting ToC includes most of the original 33 results; only seven are seen as outside the TMEA advantage. Having a ToC pitched at such a high-level fails to address the problem of the “missing middle” identified by development practitioners: the distance between what a well-funded and dedicated team of programme professionals can do, and the ambitious results required to reach the strategic and impact levels, is all the greater. Rather than start from the modest intentions of a programme built of projects, their ToC starts from the more holistic premise of all weak elements in the sectoral space. The benefit of such a ToC is that the wider set of system needs is made explicit. The disadvantage of such a ToC is that the results logic – from projects, to clusters of projects, to outputs and outcomes leading to impacts – is missing.

The ToC and the RF focused at the programme level – at the “top” of the results chain, and the chief weakness of the ToC is that it is not operationalised below this overarching level. PIOs cluster the projects operate at country, corporate and/or regional levels – the “middle” of the results chain. Day-to-day work of TMEA staff happened at a lower level still, on projects with TMEA’s partners in government or private sector. Staff universally referred the evaluation team to the corporate ToC when asked about the theoretical underpinnings for their work, and to results chains and project charters by project; no ToCs were developed connection the top and bottom level. The TMEA team therefore had to relate the projects in their components to the ToC themselves, which TMEA staff reported was an ongoing team process. As a result, the causal mechanisms and causal package (which might be a set of activities rather than a simple linear causal mechanism) between the output and outcome levels were not made explicit.

3.1.1.1 Thinking strategically

TMEA developed a number of documents and processes to help it to think and engage strategically in the absence of a ToC. These included:

- Strategy documents – For example, each country programme has a Country Strategy document, and TMEA have Infrastructure, Economic Corridor, and Arusha Programme Strategy documents on the propositions underpinning their work. Though these are not ToCs per se, they represent TMEA thinking on key issues including the development problems TMEA proposes to address, the interlocking nature of parts of their programming, and political economy obstacles and issues the programme will have to face.
- The TMEA Evidence Library, dated from January 2015. While the conclusions of this document are at quite a high-level, the detailed review in the main body of the report indicates important considerations around the three SOs. The report pays particular attention to the “long chain”⁴⁹ effects of trade on poverty, to establish ‘lines of sight from the program activities to outputs, intermediate outcomes, strategic objectives and the overall goal and impact of economic growth and poverty reduction at the impact and program level’.⁵⁰ The theories expressed parallel those underlying the OPM PGIS study, in which the three main channels through which trade may alleviate poverty are prices, wages/employment, and government expenditure. More on how these strategy documents were used in the ToC process at TMEA are included in the component chapters in Annex J.

These strategy documents serve some of the same purposes for the programme as a ToC – laying out the programme’s intentions and logic in context, and making assumptions more explicit. However, they were not treated as living documents or updated, as reported in OPM’s Deliverable 2B: Institutional and Organisational Assessment.⁵¹ For example, in Tanzania, despite a 2015 change in government, which affected government relationships with TMEA and the ability to implement, no review and updating of the country strategy took place.

3.1.1.2 The Results Framework as a guiding framework

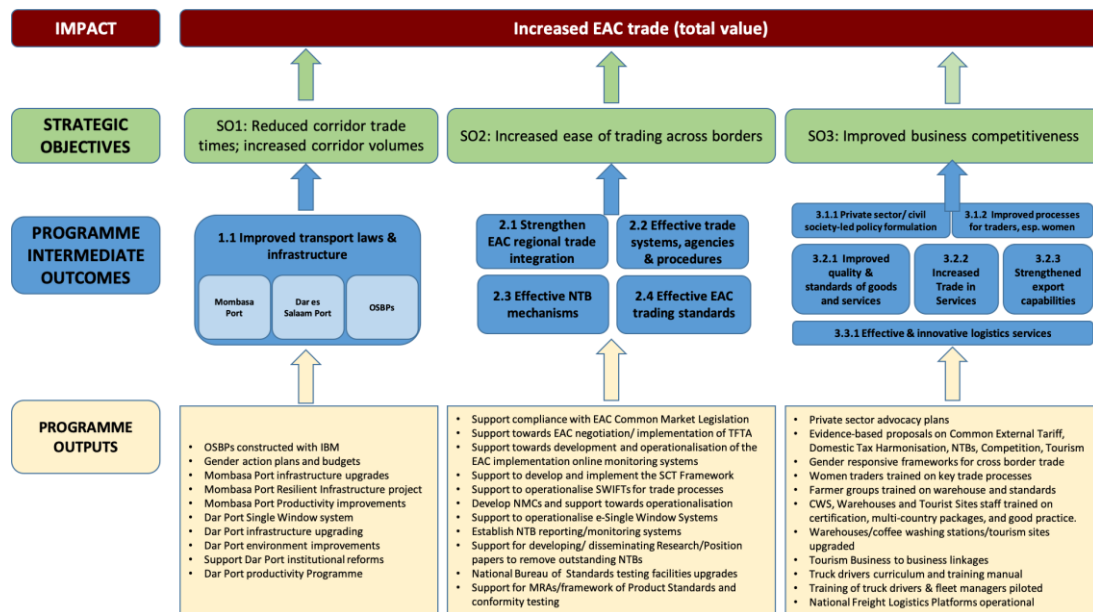
TMEA’s RF provides clearer and more concrete ToC type information, directly related to the programme’s own activities, indicators, and results. The programme outputs, outcomes, and impacts are presented in the RF at country and corporate levels. The OPM team diagrammed the RF’s implicit ToC shown in Figure 3 below.

⁴⁹ An hypothesis underlying TMEA’s work assumes that trade would affect the economy in such a way as to improve the lives of poor people, particularly those working in sectors and geographic areas more affected by international trade. The evaluation team calls these indirect or ‘long-chain’ poverty effects. TMEA also worked directly to support poor households and communities under SO3 to enhance business competitiveness and support women cross border traders (“short-chain”).

⁵⁰ TMEA Evidence Library Final Report, January 2015; p. 10.

⁵¹ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming).

Figure 3: Implicit ToC from the RF



The language in the TMEA ToC and that in the RF are somewhat different, so the evaluation team has adopted common terms to speak about the levels. The RF implies that the **impact** in red, *Increased Trade*, will be reached by achieving the three **Strategic Objectives (SOs)** (in green) that are in turn fed by achieving **programme intermediate outcomes (PIOs)**, or programmatic **components**, in blue, which are the key focus of the performance evaluation. At the bottom of the diagram are the **programme** team split the PIO into functional areas (ports and OSBPs) – which each work to improve implementation of laws, and transport capacity and efficiency.

The second adjustment is in SO3, where the evaluation team combined three small project clusters (export capability, increased trade in services, and improved quality and standards of goods and services) into one PIO given the title Export Capability. These three started later and had low levels of expenditure but have in common the goal to improve conditions for **outputs** in yellow. One or more of TMEA’s 210 projects are implicitly theorised to yield these outputs; or an average of 6.5 projects per output.

The ToC usefully distinguishes from among TMEA’s desired results those that will involve direct projects, versus those enabling, which “contribute to direct projects or reduce the risk of failure”.⁵² Enabling components are:

- 2.1 Strengthen EAC regional trade integration
- 3.1.1 Private sector/civil society-led policy formulation
- 3.1.2 Improved processes for women, especially traders

In examining these PIOs closely in the course of the evaluation, the team made two slight adjustments to their classification. One is in SO1, where “Improved implementation of transport laws and enhanced capacity and efficiency of transport infrastructure” is the stated PIO, and reflects desired results related to laws, capacity, and efficiency. Here the evaluation team split the PIO into functional areas (ports and OSBPs) – which each work to improve implementation of laws, and transport capacity and efficiency.

The second adjustment is in SO3, where the evaluation team combined three small project clusters (export capability, increased trade in services, and improved quality and standards of goods and services) into one PIO given the title Export Capability. These three started later and had low levels of expenditure but have in common the goal to improve conditions for export-ready actors on particular value chains.

3.1.1.3 Challenges with the Results Framework

The RF somewhat bridges the gap between the high-level ToC and the project-level results chains created for Project Appraisal Reviews (PARs). RF indicators – for which corporate and national team members were responsible – focused their attention on hitting their indicator targets and these therefore were a driver for how TMEA team members interpreted their roles and acted to fulfil their responsibilities. The RF was the only way

⁵² Ibid, p. 6.

TMEA operationalised the ToC and as such has become the only standard against which to examine how the programme functioned. For this reason, the section outlines the challenges in the RF to describe how, when, and why the theories of change under which TMEA operated failed to function.

The chief weakness of the RF is indicator and data quality. DFID Annual Reviews in 2016 and 2017 highlighted many indicators with severe problems, though these were apparent as early as 2014-2015 reporting. Data are missing or inconsistent with baseline, target, or the indicator description; targets are missing year-on-year; targets and actuals do not make clear whether they refer to year-on-year or cumulative results; data do not measure indicators; some methodologies are missing or incompletely described; errors identified in 2016 are not corrected by the time of the 2017 AR because 'the change awaits Board approval'; cumulative totals do not square with annual data or with country programme data, or both; sources are missing or inaccurate; and there are a small number of overlapping and redundant indicators⁵³. Nearly all indicators in the RF are cited as problematic for one or more of these problems. TMEA staff were aware of the problems but since S1 was ending in 2017, these were not corrected. Still, the problems with missing baselines, targets higher than baselines, missing targets for key indicators, unclear methodologies, and others were apparent much earlier but TMEA was not made to address the issues.

An additional challenge with the RF is that implications for women and men are not adequately measured in the process. A 2012 Gender Policy and 2015 Gender Strategy were developed but not fully implemented in S1. The Strategy promises indicators for internal processes, for which some data were gathered, and for mainstreaming, which were very weak. Indicators that reference gender are infrequent and generally poor, with the following types of problems noted:

1. Baselines are not captured (e.g., women traders' baseline knowledge)
2. No data are provided, or only for some projects (e.g., port staff trainees, traders' increase in income)
3. Data are not disaggregated by gender (e.g., logistics trainees, OSBP user satisfaction)
4. Outcome-level indicators are not substantially different from those at output level (e.g., OSBPs,
5. Indicators on 'entities' and 'farmer groups' that say they will be 'disaggregated by gender' – they are not, but an entity or farmer group is rarely composed of only one gender of people
6. Indicators are vague on the 'so what', such as numbers of tools, laws, policies (gender responsive frameworks), gender action plans (OSBPs), or recommendations (advocacy) but do not capture reliably whether these are actually implemented to the benefit of women and girls

Making changes to the RF, once it is agreed with DFID, is difficult, and would limit the ability to compare progress over time – particularly via the DFID Annual Review process. This is an important consideration. But the portfolio nature of TMEA's interventions, conceived as complex with a high likelihood of emergent change over time in the direction of investments, requires sufficient flexibility to respond to changes in political economy and other contextual change in the programme's operational space, including proposing or refining indicators.

The set of indicators and results in the corporate level RF is common to all the country results frameworks, though there are null results in countries when a project type was not undertaken. South Sudan and Burundi RFs reflect significant conflict in each of those countries; many activities were halted. There are also a small number of individual country indicators that supplement these for particular projects in countries.

3.1.1.4 Assumptions

The evaluation examined the assumptions in TMEA's RF and strategy documents (please see Annex K for a list by SO), assumptions respondents cited in interviews, and assumptions the PE team identified for the implicit component-level ToCs. TMEA's and respondents' assumptions are analysed in this section, and those identified for the recreated ToCs are summarised in section 3.1.1.5 below, and detailed by component in Annex J.

TMEA focused its attention on high-level assumptions. These include that: 'there would be sufficient buyers for East African products'; the private sector would take advantage of greater market access to expand; the private sector would add (more) value; and the private sector would be able and willing to take opportunities presented by TMEA's results.⁵⁴ Assumptions in the RF include that "governments will adhere to their bilateral and EAC trade agreements" and that "Regional integration is sustained and receives public support". For SO2, one assumption reads, "Partner States, private sector and civil society organisations (CSOs) are committed to embedding transparency and tackling corruption." SO3 assumptions include that the "private sector [...] respond[s] to advocacy around trade issues". Several restate TMEA's own goals: an example is an SO1

⁵³ DFID: BKP Economic Advisors. Annual Review of the Trademark East Africa Programme, 30 November 2017. Annex C.

⁵⁴ Ibid, p. 5.

assumption that reads, “Transport corridor and customs improvements lead to lower costs.” The TMEA Business Case suggests that transport corridor and customs improvements that they propose to make *will* lower costs. For SO3, one assumption reads “There is a conducive environment encouraging women-led businesses and traders”, despite TMEA proposing to make the environment conducive.

There was no evidence that TMEA monitored whether assumptions materialised or did not, though this does not mean that TMEA staff were not attentive to the issues raised. TMEA staff worked at the level of components, countries, or projects, not at the general levels implied by the assumptions. As a result, there is a lack of documentation of how assumptions – theoretically essential for the TMEA ToC to function as designed – actually played out through S1. Without that systematic attention, including the collection of relevant data and discussing and documenting how TMEA responded when assumptions were not met, TMEA missed the advantages of a key development tool. There is also no evidence that donors insisted upon such processes.

TMEA teams also made assumptions at project level, when writing PARs. When asked about how assumptions were dealt with in their work, country staff members responded that projects ‘went according to plan,’ a response that was often cited by partners as well. Although assumptions were rarely mentioned explicitly when respondents were discussing things that did not go to plan, they did speak about things not turning out as envisaged. ‘Resistance was not as extreme as [we] expected,’ said one country staffer. ‘That’s an indication to me that our change management worked. [We addressed] stakeholder concerns along the way.’ While the project in question may not have listed assumptions or risks as such, the statement demonstrates that resistance was anticipated and addressed.

The assumption that respondents most frequently cited as unmet was in relation to the capacity of partner agencies and organisations. In most countries TMEA respondents said they had been “too optimistic” about the capacity of government, private sector, and civil society partners, leading to mid-stream decisions to fund technical assistance for them. Across countries and categories of partners, gaps in key capacities kept projects from completing successfully and on time, without additional institutional support – and some partners reported that there remained gaps even after such support. With private sector and civil society, these gaps were most often present in the areas of finance and monitoring and evaluation. Smaller associations and cooperatives or other grassroots-level partners lacked strong skillsets, resulting in more difficult, iterative project management.

Other unmet project-level assumptions are around value chains in export capability. In one country, a TMEA respondent said that the team “wrongly assumed” that businesses would connect with buyers on the basis of their certification but that the beneficiary firms required further support to identify buyers.

Out of 45 respondents from TMEA, ten pointed out negative changes that they managed in process, most having to do with capacity constraints and political will to change. Four cases explicitly indicated that their assumptions “held”, while many others simply said their projects went according to plan. Donor respondents were more critical of TMEA’s attention to assumptions, particularly with regard to stable political economy, data availability, and intra-regional trade.

3.1.1.5 Examining the component-level ToCs

In answering DEQ5.1 the evaluation team mapped each component from output levels (building on the project-level pathway information from early evaluation work) to trace the degree to which the intermediate and strategic outcomes⁵⁵ were reached, the factors and assumptions that supported and inhibited those achievements, the quality and reliability of data from TMEA on those achievements, and the extent to which TMEA can be said to have contributed to them. Component-level ToCs were not required by the donors and were not conducted in S1. The lack of component-level theories about causal mechanisms and the national and regional elements necessary for higher-order outcomes to be realised meant that the evaluators had to reconstruct these from ex-post review of the work, using in part the RF to understand what TMEA teams believed was necessary, and intimating the assumptions underlying the re-created ToCs. Annex J provides details for each component, which is summarised here. We note where there are assumptions or elements of the reconstructed ToCs that were unexplored or where the causal mechanism did not function as desired. For each of the reconstructed ToCs, it is assumed that ‘direct’ (as opposed to ‘enabling’) components were hypothesised to lead to TMEA’s stated overarching goals as identified in the RF (please see Figure 3, above).

In the broadest terms, the evidence verifies the causal links at output level where causal assumptions were found to hold, but only a few held at outcome level, and none were found to have increased trade, at impact level. Factors that affected this include: political economy issues that stymied TMEA efforts; significantly longer time horizons (often exceeding S1) for more complex institutional reforms and productivity improvements; and,

⁵⁵ These layers are so named in the TMEA RF, and lead to the level of strategic objective.

the lack of evidence of gains at outcome and impact level. Another weakness in some components was that elements – national and regional projects, or within a given country – did not always reinforce one another.

In the SO1 projects, both soft and hard infrastructure projects tracked well through the level of outputs: **Mombasa Port** infrastructure upgrading, and resilient infrastructure activities were completed successfully and with strong ownership from government partners. In terms of productivity improvements and institutional reform projects, TMEA also successfully delivered those outputs (studies, draft bills, the signed Mombasa Port Charter and planning) that were for government partners, including three new regulations adopted by KPA on harbour, port and terminal management. But at the outcome level TMEA faced unanticipated resistance to reforms that promised to provide a durable plan for improved efficiency. The long processes to gain consensus on the Mombasa Port Charter meant that, at the end of S1, the groundwork had been laid but the degree to which the signatories will make necessary changes was, and still is, uncertain. **Dar Port** work has been limited at outcome level as well, and TMEA intentions for S2 at Dar Port are on hold while they await an MoU. Importantly, there was insufficient evidence linking reduced port times (at either port) to lower port costs and on to increased trade. In this way the implied ToCs of work on the two ports faltered at the level of strategic outcomes, and assumptions about political will did not bear out.

OSBPs benefited from project-level results chains, but these were fragmented and lacked documented critique around the causal logic underpinning them, particularly how projects fit together to generate programme-level outputs and outcomes. OSBPs largely met their output goals as well as outcome goals around time reductions, indicating that the design of physical infrastructure improvements and integrated border management (including bilateral agreements) largely did prove sufficient for the realisation of the planned outcomes. In fact, OSBPs generally had much more time savings than was targeted. Outcome-level results on gender action plans are not well substantiated, however. Given regional cultural norms, assumptions about uptake should have been investigated and obstacles mitigated. User satisfaction levels were also improved at most border posts but one otherwise successful border post (Busia) had lower results. The PE team could not explain why this was so – but it raises a question about the assumption that the OSBPs would improve user experiences across the board.

The transport observatories helped TMEA, national governments, port and revenue authorities, and private sector stakeholders monitor progress, particularly at ports. Having data for evidence-based decision-making was (and remains) an important assumption in development, and the observatories accessed data from member states and made them available transparently. However, there were challenges around these activities. The lack of data collected on exports is an important gap, since TMEA, national governments and EAC all identify export growth as key for the region's economies. Some presentations of the data on the corridor websites were challenging to use, and some data were missing. The observatories were also not represented in the ToC. The evaluation found no evidence that TMEA had checked if or how the data were used by decision-makers, missing an opportunity to test this assumption and learn from it. Not having these in the ToC also obscured key links to other components and actors, such as capturing changes in exports and in customs compliance.

ICT for Trade projects in regional cargo tracking, single windows, and some customs management had important successes at project level, linking directly to outputs, and some good integration at country level, such as single windows and customs management systems that linked within and across Uganda and Rwanda. The RF provided some help as a guide to the underlying ToC with three outcome indicators that appear useful: reduced custom clearance times, reduced number of documents required, and reduced number of escorted consignments. There were tangible gains for Rwanda at outcome level with reduced customs clearance times, but the reduction for Uganda was slight and those for Kenya and Tanzania were not reported due to the systems not being online by the end of S1. TMEA dropped the indicator on the number of documents required in 2016 when the indicator was no longer captured by the Doing Business methodology used by the World Bank. The escorted consignments indicator went from 50 trucks per day at baseline, to zero in year one, with no additional data.

Examining the issue of the number of documents required would have meant confronting the overlapping political bodies involved with permits, while the actual manner of selecting which agencies to support was to maximise usage, not to address the system's design. This is a legitimate decision for TMEA to have made, but they might also have considered working in a different way: by understanding where documentation was required and where it overlaps, they could have seen those challenges as part of a concerted proposal to make streamline the system, and instead chosen to support agencies working towards those ends. A component-level ToC process could also have been utilised to see those barriers to entry and to export as at least as important as having to undertake processes in person. A ToC process could have surfaced issues around 'filling the pipeline' with national exports and targeting support to entrepreneurs, SMEs, women, or other groups, rather than assuming that IT systems were equally accessible to all.

Standards work was conducted at national and regional levels, both of which achieved important output-level successes in supplying equipment and training (national level) and harmonising some 196 standards (regional); however, they were not explicitly reinforcing. The evaluation found this to be a missed opportunity: proposed component-level outcomes would have benefited from a linked ToC that contemplated shared responsibilities for the different interventions. Country teams could have made explicit efforts to achieve border compliance on harmonised standards, including capturing ongoing data from standards actors at borders. This would have helped the regional programme to quantify the effects of its harmonisation efforts and to identify and address emerging issues through regional fora. TMEA made the implicit assumption that compliance would follow harmonisation and the work with standards bureaux, but this is not supported by the evidence. In export capability projects, one challenge identified in implementation was the failure of border officials to recognise mutually agreed standards. With more robust thinking about the ways in which quality infrastructure across the region remained incompatible, the regional programme might usefully have advanced a related agenda, to facilitate the shared measurement and processes that would more fully integrate what Country Programmes did individually.

The evaluation found some evidence that Country Programme efforts in Rwanda, Kenya and Uganda had resulted in reductions in time to test and issue relevant certificates, a key outcome-level indicator. However, the RF indicator reads 'Reduction in average time to test and issue certificates for selected goods for intra-regional export by country'; 'selected goods' are not defined or reported on, nor have the goods been shown to be 'for intra-regional export' which would have put the data in a clearer and more relevant context. There is also an assumption that reduced laboratory testing time is equivalent to clearance time – which is untested and *prima facie* problematic: inspections at borders most likely do include time other than the lab test itself. Data show average cost reductions for testing in three countries. The RF's other indicators for the national-level work – one dropped by TMEA, one with incomparable data, and one with minimal effects – do not show convincing gains or a functioning logic around building equipment and training resources, leading to durable gains for SMEs or mutual recognition of standards. The RF outcome indicator for the regional programme, number of harmonised standards, does not convincingly show outcome-level results, without data on mutual recognition at EAC intra-regional borders. Using a ToC process to identify assumptions about how their work would generate national behaviours that favoured integration would have isolated the weaknesses and allowed for a stronger design.

The NTBs component eliminated 116 NTBs, but failed to present a convincing outcome-level achievement in the RF, nor was the evaluation team able to identify external data – apart from the frequently cited removal of weighbridges – which made a durable difference. Non-tariff measures that obstruct or complicate trade are deeply challenging to address systematically. The EAC had attempted to systematise the response with the NMCs, and TMEA supported these bodies for the duration of S1, delivered support for research, held regional fora, and compiled regional quarterly reports (RF outputs). However, evidence gathered during the PE tended to show both increasing trade disagreements resulting in NTBs, and less government commitment to continuing to fund NMCs at levels necessary for their work. In this way, earlier benefits from eliminating NTBs did not last.

The RF's sole outcome-level indicator on the 'No. of High Priority NTBs eliminated (disaggregated by country) against the total number of NTBs still reported as outstanding' was not reported as such, in that the data only show a number of NTBs with no priority and no information on the proposed denominator – what remained to be eliminated. The lack of data putting the NTB component's achievements in context is part of the challenging nature of the work, but the problem was that the system-level thinking underpinning the design had not resulted in sustaining, system-level solutions. The causality of working through NMCs and the SMS reporting system to identify, address and remove NTBs worked at least at an anecdotal level with certain NTBs, but an effective systemic response is not in evidence as a result of the strategy employed by TMEA. One key area lacking in the ToC is the political work of amending the NTB Act to remediate and apply consequences when countries employ NTBs.

'Enabling' components in SO2 and SO3 were part of the overarching ToC but without component-level ToCs; the PE has re-created these as well in Annex J. These differ from the 'direct' components in that their goals were more supportive of the direct components than leading directly towards TMEA strategic outcomes. The causal links and assumptions underlying these were minimally evidence-based or verified, though there were some clear benefits produced at output levels. Outputs such as strategies, policies, research papers, or recommendations developed; process indicators on the SCT; and operationalisation of the EAMS showed at least partial successes. The policies and papers that were developed are listed, for example, and are clearly positive for the advocacy and industry groups to have developed. TMEA supported the EAC in many efforts, including the SCT; they trained women traders and cooperatives; and they helped industry improve their ability to advocate and participate in trade dialogue.

But at the level of implementation of these initiatives, there is less evidence of outcome-level results or of how these fit together into a larger set of goals, showing weak causal logic behind how those higher-order results would be achieved. Outcome level indicators suffer from some of the same weaknesses identified above in the section on the RF – particularly that the indicators are not written to show results, and that data are unclear or missing. Given the importance of the RF in the absence of a related ToC, these indicators provided little guidance to TMEA on how to realise their higher-order goals, or indeed what those goals were – the projects and components were at least in part cross-cutting, rather than distinct parts of the overarching ToC. These challenges are detailed in Annex J, but common assumptions were that organisations would have stronger capacity and could improve in shorter time frames than was found possible; and that gender-related planning and strategy would find traction in government within frameworks that would affect women traders from a policy level. With the EAC component, there were two assumptions that did not hold, even when outcome-level indicators showed strong improvement: that increased trade revenue for Partner States would incentivise regional integration, and that mechanisms for holding Partner States to account on integration would bring compliance – both of which would then lead to increased integration and trade. The reduced momentum for regional integration in the wider political economy affected TMEA reaching their outcomes.

SO3 work on **export capability** followed project-level results chains to some important successes for some value chains, including outcomes such as increased export revenue and incomes for producers; reduced rejection of commodities; and some increased access to markets. An outcome indicator on certification was less successful across projects, though there were some entities that were able to certify their production. However, TMEA did not theorise concretely around the larger goal of increasing competitiveness at scale, so while the causal link between the achievement of multiple project successes and the outcomes held, they did not reach scale except for those producers and value chains. There were also assumptions about the capacity of cooperatives and entrepreneurs, short project timelines, and cost-benefit calculations that limited TMEA's success with certifying producers in the projects. Cooperative and farmer group capacity was lower in many cases than TMEA had assumed, the timelines were too short for the stated capacity and certification goals to be realised, and farmers did not always want to be certified because they did not think ongoing certification costs would be covered by the uncertain income from new buyers. While these assumptions might well have been dealt with more proactively through a ToC process, the scale issue (addressed also in a portfolio review from 2014) had to do with how projects were chosen and how much funding was allotted to this component.

The logistics component worked through both industry-level advocacy efforts and training for multiple actors across logistics-related industries. Though partner respondents were concerned about continuity of funding, they also reported important output-level gains during S1, such as the creation of two national logistics strategies, and increased ability to research issues and present evidence to policymakers. However, even at output level, the national logistics strategies were still incipient at the end of S1. The ToC logic behind training drivers and customs actors worked well for the latter, but was suspended for the drivers, which meant the outcomes from that training were not met: improved road regulation compliance and reduced fuel costs, leading in turn to reduction in transporters' operating costs and improved performance on a logistics performance index. Similarly, the ToC logic of providing grants for logistics solutions did not result in wide market acceptance of the resulting innovations, as time for S1 ran out. The implied logic chain lacked successful ways to manage these challenges, to track achievements, to scale up innovations, and to re-tool efforts when these faltered during S1 – though work has begun in S2 to redress some of these issues.

3.1.1.6 Conclusions

Using ToCs is often a donor requirement, but it can be a useful process with an iterative approach involving teams from across the components. There are important lessons from the PE and from S1 on how well the components performed as a whole to reach their outcomes, which show where improvements could be made with effort given to ToCs and thinking about and systematically monitoring assumptions and causal linkages.

Having one high-level ToC for such a broad programme, along with project-level results chains, was sub-optimal. The TMEA ToC did not adequately delineate how TMEA would work on the components that were chosen for intervention, but instead presented an overarching roadmap of what its authors felt were necessary elements for trade integration to proceed in the EAC. The donors did not require that the ToC be more closely linked with what TMEA was working on, though individual projects were required from then on to have results chains that were explicitly linked to the overall ToC. It was an impossible task, as the ToC was not designed at the level of aggregated projects but at the level of aggregated clusters of projects, or components. As the development community has worked more with ToCs over the years, the need to explain the 'missing middle' or 'meso-level' has become more apparent and the effort to redress the issue more widespread. At the time of this process in TMEA, however, there was no guidance from donors to establish the link between the overarching roadmap and the clusters of work TMEA was already well involved in implementing.

It is unlikely the different project and component teams could interpret the overarching ToC consistently without such guidance, in the face of substantial changes in political economy and in contextual issues. While this is marginally offset by the TMEA strategy documents and by the presence of the professional, capable, trade sector specialists who make up TMEA's team, the strength of outcomes at the time of the PE indicate that the implied ToC under which they operated was generally not borne out through the package of causal designs beyond output levels. Undoubtedly, their conversations with and about their partner institutions and their contextual knowledge (national and regional) helped them confront challenges in their work that might have been documented and debated, had TMEA started a few years later. But, in the event, TMEA did not document detailed assumptions on political economy and programming issues sufficiently at country or component level.

Lacking a candid and iterative process at component level around these issues, vetted by donors' and other stakeholders' perspectives, likely contributed to some of the day-to-day challenges faced by country and HQ staff that might have been identified and mitigated earlier in such a process. One example is the widespread reporting that assumptions about organisational and institutional capacity were too optimistic. Other assumptions that were foundational and ought to have been tracked more closely included assumptions about the potential for instability based on country-specific political economy issues, the advent of both devolution and the Standard Gauge Railway (SGR) in Kenya, and the availability of key data from governments, including partners.

The most frequent difficulty around component ToCs is the effect of changes in political economy, in the appetite for RI, in government preferences around reform, and in the wide, complex landscape represented in TMEA's overly general S1 ToC. The degree to which one programme – however well-funded – could intervene in and affect so many deep systematic and political challenges to trade flows was limited, and at component level, insufficiently explored in strategic and operational plans. Foundational assumptions about causality rarely functioned as planned at outcome level, though some were stronger in achieving outcomes than others.

The RF is somewhat helpful as a ToC-substitute on the ground, inasmuch as it links clusters of outputs with the outcomes to which they are supposed to lead; but the indicators, baselines and target/actual data are poor and provide a weak basis for strategic review and do not show strong causal linkages in the design of the RF or in the data that were captured. Only the OSBPs and ICT for Trade components had convincing evidence of outcome-level achievements, per the RF's indicators. Nearly all corporate indicators are in each country data table, though at times the regional indicators poorly match country-level efforts. While the 2016 and 2017 DFID Annual Reviews highlight these critical weaknesses, the issues were clear much earlier and compounded over time. The results are a poor representation of TMEA accomplishments, where they can be interpreted at all. The indicators and data did not verify the ToC over time, particularly in the 'missing middle' – at the level of outcomes.

This is less pronounced for major projects that are focused on a given country, as in the case of Mombasa Port, and more pronounced in broader, more differentiated programming, such as export capability. Other clusters of efforts are less well represented because indicators are insufficient for tracking beyond outputs, such as NTBs and ICT for Trade, and where data are not comparable, as with Standards. These problems exacerbate the issues with verifying the component-level ToCs issues where the logic chains within components are not sufficiently captured by the chosen indicators, and/or with the data for those indicators.

By component, TMEA's implied causal links were sound at the output level, but only OSBPs and ICT for Trade showed convincing evidence at outcome level, and none were found to have increased trade, at impact level. Political economy, underestimated time horizons for complex institutional reforms, and the lack of evidence at outcome and impact level were the primary factors affecting achievement of these results. The list of components and whether their outcome-level causal links held is shown below.

Table 5: Outcome-level causal links status, by component

Component	Status of outcome-level causal links, and related notes
1.1 Mombasa Port	Reduced transport time and cost link holds , but not to the level of increased trade.
1.2 Dar es Salaam Port	Causal links hold to output level only.
1.3 OSBPs	Reduced transport time and cost link holds , but not to the level of increased trade.
2.1 Strengthening the EAC	Causal links hold to output level only. As an enabling component designed to strengthen across an institution, outcome-level causality was not well-defined.
2.2 ICT for Trade	Ease of trading across borders link holds , but not to the level of increased trade.
2.3 Eliminating NTBs	Causal links hold to output level only. Better data might have verified outcome links.
2.4 Harmonisation of standards	Causal links hold to output level only. Better data might have verified outcome links.
3.1.1 PSO- and CSO-led policy formulation	Causal links hold to output level only. As an enabling component working with multiple partners, this might be considered more cross-cutting than standalone, as in S1 TOC.

Component	Status of outcome-level causal links, and related notes
3.1.2 Improved processes for traders, especially women	Causal links hold to output level only. Better data might have verified outcome links.
3.2 Export capability	Causal links hold to output level only. Better data might have verified outcome links.
3.3 Effective and efficient logistics	Causal links hold to output level only, and only for some outputs.

DEQ5.3 To what extent does TMEA support EAC regional trade development priorities?

The answer to this question examines the EAC regional trade development priorities, per the Secretariat's published goals ('pillars'), TMEA strategy documentation around RI, interview data, and the degree to which TMEA's S1 projects aligned operationally as S1 progressed. Interviews also provided information on how alignment was constructed during S1.

From the outset of S1, TMEA strongly supported EAC regional trade development priorities. Their TMEA Arusha Programme Strategy (31 July 2012) was created to:

'provide strategic support to EAC organs to strengthen their capacity and improve their crucial role in developing, coordinating and overseeing legislation, policies and programmes aimed at achieving the 4th EAC Development S2012-2016 The programme seeks to contribute to the overall TMEA goal of increased growth and poverty reduction through deeper RI and trade competitiveness, through substantially improving the development of a comprehensive framework for RI by building the capacity of EAC organs and facilitating the EAC Legislative Assembly (EALA), to positively influence EAC integration policies and practices for growth in trade.' (p.4) [sic]

TMEA's Transport and Economic Corridor Strategy, which was a central guiding document during the early years of S1, referred to RI as a centrepiece of TMEA design: the purpose of TMEA efforts across the SOs was to facilitate regional trade integration. The document framed RI as a central part of the resolutions TMEA proposed for many of the problems constraining trade and growth in the region⁵⁶. TMEA had a dedicated budget to supporting EAC Secretariat RI efforts, with an office and team in Arusha. Spend on the component equalled US\$46.8m or nearly 43% of SO2 and not quite one-fifth of overall operational expenditures⁵⁷ – second only to the sum of completed infrastructure at border posts. Most TMEA efforts in the other PIOs were geared towards RI goals: ports and border post infrastructure to reduce time and cost for international trade but also for intra-regional trade; integration of ICT systems for the efficient processing of trade according to the Single Customs Territory (SCT); EAC-wide harmonisation of standards and mechanisms to eliminate NTBs that limited intra-regional trade integration; national and regional policy advocacy support to increase demand for RI; and so on. The degree to which TMEA's website and document language evolved over the life of S1 reflects fewer references to RI and more to trade goals and prosperity. This is notable in the Mission Statements early in S1, compared to S2 in the Corporate Strategy 2017-2023, dated November 2016, where RI no longer appears in the Mission Statement.

The Arusha Programme undertook targeted investments with the EAC Secretariat throughout S1, in line with work TMEA was doing across components and at national level in Country Programmes. The EAC Secretariat made important strides during S1, making use of TMEA's support across the components in their mandate: the OSBP Act; multiple steps towards implementing the SCT and the Customs Union; ongoing regional NTB forums to resolve NTBs; harmonising 196 standards; and ensuring the involvement of the private sector and, to some extent, civil society at the highest levels of EAC negotiations. South Sudan acceded to the EAC during S1, and a private sector partner there noted the importance of having a direct line to the Secretariat.

HQ and Country Programme expenditures included work at national level on the same or related components – OSBP Act domestication, national monitoring committees that fed into the regional NTB process, harmonisation of standards, and so on, designed to help Partner States comply with the EAC's trade priorities.

The EAC has four pillars⁵⁸ for regional integration, as detailed on its website. TMEA's S1 design provided close support across the ToC. Specific support to EAC – including the evidence as cited by respondents and found in data – as part of each PIO can be found in the reports in Annex J. Table 6 summarises EAC priorities that TMEA specifically supported at national and regional levels, linked to the EAC priorities they buttress.

⁵⁶ TMEA: Transport and Economic Corridor Strategy. 30 June 2012, pp. 9-10.

⁵⁷ Authors' calculations from budget and expenditure data TMEA's corporate office provided to the evaluation team.

⁵⁸ Two pillars, the Monetary Union and Political Federation, will fall sequentially later in the EAC agenda, and were therefore not included in this list or in TMEA's ToC.

Table 6: TMEA support to EAC Regional Trade Development Priorities

EAC Regional Trade Development Priorities	Related TMEA activities
<p>EAC Pillar: Customs Union and the Single Customs Territory⁵⁹</p> <ul style="list-style-type: none"> • ‘Interconnectivity of customs systems to facilitate seamless flow of information between customs stations and a payment system to manage transfers of revenues between EAC Partner States’ • Elimination of NTBs • Enabling Partner States to enjoy economies of scale; supporting economic development through the establishment of a Single Customs Territory 	<ul style="list-style-type: none"> • Supporting Customs systems, SWIFTS, expedited trade programmes to reduce time and cost of trade • National and regional NTB reporting/ resolution mechanisms • Eliminating NTBs and reducing opportunities for corruption • Supporting NMC, bilateral and regional meetings of government and private sector to resolve NTBs • Minimising theft/ diversion of goods with the RECTS • Supporting EAC Technical Working Groups on SCT
<p>Infrastructure: Coordinating, harmonising, and complementing transport and communications policies; improving and expanding the existing transport and communication links; and establishing new ones.</p>	<ul style="list-style-type: none"> • OSBP development, the OSBP Act, and ICT integration • Infrastructure at Dar and Mombasa Ports to improve capacity and efficiency and improve environmental compliance • Support to multi-modal transport in SGR process
<p>Trade: Rationalising investments and the full use of established industries to promote efficiency in production, as well as harmonising trade policies, investment incentives and product standards, with a view to promote the Community as a single investment area.’</p>	<ul style="list-style-type: none"> • Country policy projects and support to EAC-related ministries • Standards Reform Acts, Policies, Bills, and technical regulations; work with Standards Committee. • Lab equipment and inspector training to reduce time and cost • Supporting private sector (including SMEs) in standards • Improved logistics services quality and efficiency
<p>Tripartite: ‘The COMESA-EAC-SADC Tripartite is accelerating economic integration for the people of the Eastern and Southern African Region’</p>	<ul style="list-style-type: none"> • TEPP support to build capacity of EAC & national negotiators • Implementation of Tripartite NTB system
<p>Industrialisation and SME development; promoting investment and private sector development</p> <ul style="list-style-type: none"> • Improving the competitiveness of the industrial sector to enhance the expansion of trade [...] • Providing an enabling environment for the private sector [...] through continuous dialogue 	<ul style="list-style-type: none"> • Reducing trade times and costs to make EA exports (and EA companies) more competitive • Select industrial value chain support • Linking AEOs and revenue authorities; support to private sector and civil society-led policy formulation • IFC Common Market Scorecard
<p>Targeted Secretariat-level interventions to increase EAC capacity</p>	<ul style="list-style-type: none"> • Fiduciary Risk Assessment and systems support • Videoconferencing for communications at lower cost • Supporting the EAC Trade Report • EAMS – monitoring EAC agreement implementation
<p>Gender, community development and civil society: [...] approaches towards disadvantaged [...] groups, including women, children, the youth, the elderly, and persons with disabilities aimed at employment creation, poverty alleviation and improving working conditions.</p>	<ul style="list-style-type: none"> • Women and Trade programme trained cross-border traders in STR and increased their income; included women in NTB NMCs, Joint Border Committees; and worked with export-ready firms and entrepreneurs on standards, post-harvest procedures (in several market chains), and market access

Source: authors’ assembly from EAC website, TMEA reports, and interview confirmation

3.1.1.7 Conclusions

TMEA’s work was tightly aligned with the EAC Secretariat’s RI agenda, and supported EAC regional trade development priorities to a great extent. While there is a case to be made for that the momentum for RI in the region has slowed (please see the next section), much of TMEA’s original focus on RI can clearly be seen across the S1 ToC – by design. TMEA’s work thus had purpose-built relevance to the EAC RI agenda. TMEA and Secretariat teams worked together collaboratively throughout S1, because they shared the same goals *a priori*, rather than needing to forge that collaboration.

DEQ5.4 How have changes in policy and in the political economy in the region impacted on TMEA or on its relevance?

TMEA operates in, and attempts to reform, a changing environment that is highly charged with commercial and political interests. Its programming has had significant economic effects for transport and logistics operators and owners; political and bureaucratic actors and agencies; individuals and businesses along key value chains; and others. TMEA leaderships have worked to position themselves as neutral brokers working to facilitate access to markets and integrated policies, and report being wary of documenting political challenges, for fear they would

⁵⁹ <https://www.eac.int/customs-union>

fall into the hands of partners, potential partners, or spoilers. This made tracking attention to political economy more challenging, though respondents demonstrated political savvy in many evaluation interviews and site visits.

A DFID respondent laments this reticence, saying that TMEA ought to have some record of their extensive deliberations around these issues, which are not reflected in TMEA's ToC or strategy documents except in very abstract terms. Another donor from earlier OPM fieldwork called the TMEA method 'informal exchanges within formal processes', in that project and programme leadership continually reach out to partners, knowledgeable actors, and potential beneficiaries about political economy issues. While these are not formally recorded, the respondent said, 'the approach has borne good fruits without risking execution of projects.' They further noted the topics that tend to bring resistance from political actors: 'reforms related to labour, political structures and corruption, [...] presidential abuse of power, dysfunctional institutions, etc.'

In addressing this question, the evaluation considered the impacts that changes and challenges in political economy had on TMEA at regional and national levels, and in particular, those related to governance, fragile and conflict-affected states (FCAS), and trade and integration. The PE examines how TMEA worked with political economy throughout S1, including taking advantage of the work of Overseas Development Institute (ODI) and others on trade-related political economy analyses, and how those mechanisms have impacted on programming. The evaluation takes advantage of the ex-post timing to examine political economy developments since the end of S1 and concludes on TMEA's practices and the effects of political economy on relevance and impacts. This means that the evaluation refers to events outside S1 – understanding that though this is an evaluation of S1, political economy continues to affect TMEA in S2 and should be an explicit part of planning. Some gains from S1 have been eroded, making TMEA's S2 results more challenging, as well.

3.1.1.8 Political economy challenges related to governance

Where TMEA projects did not go 'according to plan', most respondents identified changes in the political economy that affected programming as the reason. Foremost among issues cited were disagreements between countries and changes in government, whether through elections or ministry reshufflings. Political economy challenges related to governance particularly impacted TMEA in Kenya and Tanzania. This may be because they faced contested elections during S1, or because incentives to facilitate trade are more unequivocal for landlocked Rwanda and Uganda. The fallout of political economy-related problems in one country often spilled over to affect other countries – as in the case of the Kenyan elections and the insecurity in Burundi and South Sudan, discussed in more detail below.

Respondents reported that the elections in Kenya caused traders to adopt a cautious approach, reducing trade and the use of TMEA-supported ICT systems. Diverse stakeholders reported this in interviews in Kenya and Uganda, including TMEA staff and partners, border officials, an industry apex body, donors, a national staffer from a government ministry and traders. Businesses fearing damage to their goods and vehicles in areas of unrest reduced their levels of trade: 'trade practically stopped', 'the elections had an important impact', 'every time there is a Kenyan election, traders are more wary and decrease trade'. A Chambers of Commerce respondent reported having lost revenue because there were fewer applications for Certificates of Origin during the run-up to the election. A transporters' association reported that there was 'no business as clients were not bringing in goods'; they worked with the Kenya Police and KPA to patrol cargo during the three months prior to the elections. An EAC respondent noted that national EAC ministry counterparts were anxious, and that regional work became low priority. A TMEA civil society partner noted that 'trade was not a priority after the elections' – indicating that the issue affected projects pre-election. TMEA staff and industry associations lamented having to 'begin again' with the new administration to 'get buy-in', in multiple ministries, for multiple TMEA projects. Elections are often problematic in this way, with new administrations not necessarily sharing earlier priorities; but the effect on trade around Kenyan elections was especially deleterious for TMEA's functioning.

On the positive side, a private sector body supported by TMEA engaged politicians in public dialogue in a set of regional and national debates and roundtables, 'instead of going for more populist rhetoric'. While they admitted that these and earlier elections brought instability, and ever-longer election cycles, they had a concrete agenda – supported by TMEA – to maintain an issues-related debate to improve the quality of democracy in Kenya.

Changes in government in Tanzania and Burundi⁶⁰ affected TMEA's work. Respondents from TMEA, private sector and civil society in Tanzania reported that the 2015 change of government changed the landscape for the Tanzania Country Programme (TCP), with significantly reduced appetite for collaboration at Dar Port, at the One Stop Inspection Stations (OSIS), on EAC priorities, and with the private sector. A regional logistics operator corroborated, saying that Dar Port lacked cooperation on improvements to port operations 'at the highest levels.'

⁶⁰ This evaluation did not cover Burundi but spillover effects from insecurity in Burundi and the absence of its president at three consecutive EAC summits have had effects outside the country's boundaries.

A civil servant said the work at the OSBPs became significantly more uncertain and difficult with the change in government and led to concrete problems such as delays in tax exemptions. At a parastatal institution, a respondent discussed the new government introduced VAT on transit cargo, which ‘reduced competitiveness of the performance of the corridor and the number of cargoes reduced significantly.’

The previous president’s Big Results Now (BRN) initiative, which included port upgrades in its transport pillar, was formally dismantled in 2017 by the current president.⁶¹ The TMEA RF cites plans for projects that were never realised because of the change in government, and earlier OPM fieldwork confirmed this as well. On the other hand, one Permanent Secretary in Tanzania brought greater interest for ICT for Trade interventions following the elections, and what had been difficult to begin became easier.

Kenya’s trade-related government offices have been subject to shuffling of top personnel and their priorities, but also of portfolios. International trade has changed ministries twice, and personnel have consequently been relocated. Some who had significant experience were moved into global roles. These changes have made the trade policy efforts in TMEA’s Kenya Country Programme very challenging: ‘work progress stops, the process and priorities change.’ It was also said to make medium-term planning very difficult.

Nevertheless, TMEA is said to have reacted well to the challenges and realigned their timing: ‘TMEA has built strong networks and a credible organisation, which is well respected by governments in the region. So, when they were faced with the challenge of change of government, they quickly brought in the new team who were up to speed on their work programmes.’

3.1.1.9 Fragile and conflict-affected states

FCAS presented particular challenges for TMEA during S1. Insecurity in both Burundi and South Sudan halted TMEA progress in those two countries. In South Sudan, the violence that caused the TMEA team to decamp to Kampala has abated, but instability, currency devaluation and inflation remain. This has caused significant project delays, across the country portfolio, according to government and a Women and Trade programme partner. South Sudan had been the most important export market for Uganda prior to the violence. The previous peace process, it was reported, had increased trade flows between the two countries. South Sudan remains important to Ugandan exporters, as its second-largest market, according to URA data.

In Burundi, insecurity and leadership change nearly halted TMEA work there. The president has missed the last three EAC Summits and brought the heads-of-state deliberative process to a halt, and TMEA projects there were closed or on a shoestring during S1. A Uganda respondent noted that scheduling meetings with Burundian partners was impossible – they simply did not respond. Insecurity also affected the functioning of a distribution centre in Rwanda where TMEA-supported export capacity firms found Burundi too dangerous to work in.

TMEA reduced programming in Burundi to non-government partners in response, and for South Sudan, moved the Country Programme team to Kampala for reasons of safety. Those challenges continue to the present day, with important changes that TMEA has monitored. Positive private sector involvement in TMEA projects in Burundi, a new MoU with that government, and eager government departments and women entrepreneurs interviewed in South Sudan, all indicate that the TMEA agenda has not lost relevance despite the political and conflict-related challenges in those countries.

3.1.1.10 Political economy challenges around trade and regional integration

While a proposal for continental African free trade area has emerged, which may change the regional integration calculus⁶², there is evidence that the momentum in the EAC for RI has slowed, according to several interview respondents in government, the EAC, and TMEA, as well as the press⁶³ and donor community. As one leader from a TMEA country programme shared, ‘the political heads of our countries aren’t as integrated as they were 5-10 years ago. It is the lowest point of integration in a while. We say we want to veer [away] from politics, but we have to address the political and economic weakening of the integration goal.’ This is not only within the region but among donors, who, according to TMEA sources, were less interested in supporting RI particularly (as opposed to trade) following a euro currency crisis and then the Brexit referendum.

⁶¹ The Citizen (2017) “Lessons in BRN Cessation,” June 26, 2017. Available at: <https://www.thecitizen.co.tz/oped/LESSONS-IN-BRN-CESSATION/1840568-3991632-136qn0xz/index.html>

⁶² Ighobor, Kingsley. 2018. Africa set for a massive free trade area. <https://www.un.org/africarenewal/magazine/august-november-2018/africa-set-massive-free-trade-area>

⁶³ Chepkoech, Anita. 2016. New scorecard report shows EAC yet to fully implement common market protocols. In The Nation (Kenya). <https://www.nation.co.ke/news/EAC-common-market-protocols/1056-3435654-8272qs/index.html>; The South African Institute for International Affairs. 2018. Reviving regional momentum. Available at: <https://saiia.org.za/research/reviving-regional-momentum/>; Maina, Wachira. 2017. Time for EAC to lower its sights; throw out federation dream. In The East African, 30 May 2017. Available at: <https://www.theeastafrican.co.ke/oped/comment/EAC-political-federation/434750-3948146-w43lh8z/index.html>

Both Uganda and Rwanda, on the other hand, are smaller, landlocked economies with much to gain by regional trade integration and trade facilitation. Their engagement with TMEA was often exemplary, from the highest levels of government to technical specialists. In Uganda, agency partners, some private sector, and TMEA staff cited generally positive and proactive attitudes about trade and the interventions. One apex body representative said, ‘Museveni called a meeting of regional presidents to discuss the Northern Corridor, and this set the agenda. [...] Otherwise lower level technical people in government [could] “dig in” and not move.’ Another apex body leader listed the policies that had made a difference: ‘No need for a certificate of origin in EAC. No need for a passport to travel in some EAC countries. Less harassment at the border posts in other EAC countries. [And] increased partnerships on security issues, politics, immigration, customs, [and] health have all reduced time and cost of conducting business at the border.’ Agency respondents agreed, saying as the number of agencies in the electronic Single Window (eSW) grew, so did confidence in using the system. Rwanda’s partners reported strong backing from government as well, as with Customs, revenue, and standards authorities, for whom TMEA’s goals were high priorities.

Nevertheless, all partner states continue to disagree over rules of origin, standards, preferential treatment for some goods, like dairy and second-hand clothing, and special tariffs for others, like pharmaceuticals and sugar. There are also trade stoppages, such as that in 2019 between Uganda and Rwanda at the Katuna-Gatuna border post and related developments between Tanzania and Rwanda in response.⁶⁴ Traffic was diverted to Kagitumba-Mirama Hills against popular wishes,⁶⁵ and heads of state were reported to have traded accusations. Disagreements continue between Tanzania and Kenya that are hypothesised to be rooted in their variable levels of growth, with resulting protectionist policies and more frequent NTBs, as reported by government and private sector respondents across the sample of interviewees, as well as the press⁶⁶ and the 2016 Common Market Scorecard.⁶⁷ It is perhaps not surprising that most of these problems are not with the EAC per se, but bilateral; the previous EAC ended in 1977-1978, in part because of the perception of unequal gains from RI, and inadequate correction of those unequal gains.⁶⁸

This is not helped by lacklustre performance in intra-EAC trade during the second half of S1, an implicit assumption of the ToC. International data show stagnation in intra-regional trade over the course of S1,⁶⁹ The International Trade Centre (www.trademap.org) shows a slight increase again in 2018, but overall the figures show a steady gain in the years prior to Trademap’s S1 and then, at best, a levelling off.

⁶⁴ Barigaba, Julius. 2019. Uncertainty at Gatuna as businesses count losses, trucks find new routes, in *The East African*, March 9, 2019; People Daily. 2019. EAC Secretariat warns of threats to integration, in *The People Daily*, Business Hub section, March 13, 2019; Mugisha, Ivan. 2019. Is Kagame looking for an alternative route to sea? In *The East African*, March 10, 2019.

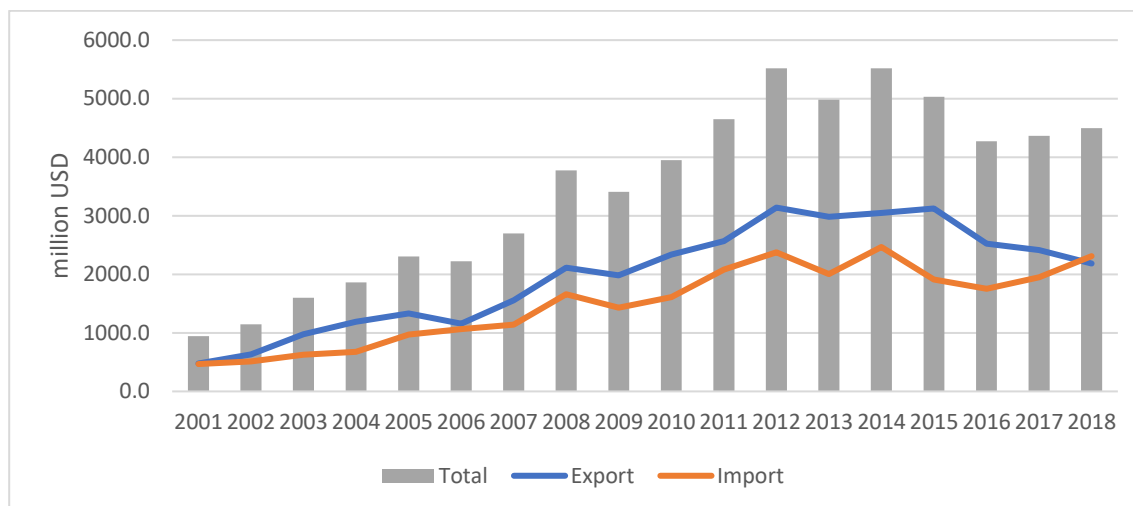
⁶⁵ However, this may have been seen as an opportunity, since both the Rwandan government and TMEA are interested in seeing traffic increase at the latter border.

⁶⁶ *The East African*, 2019. Tanzania, Kenya now row over border screening. March 9, 2019.

⁶⁷ International Finance Corporation. 2017. East African Common Market Scorecard 2016. Tracking EAC Compliance in the Movement of Capital, Services and Goods.

⁶⁸ Ojo, Olatunde. 1985. Ojo, Olatunde, Ojo, O. (1985). ‘Regional cooperation and integration’, in Ojo, J.C.B. Orwa, D.K. & Ufefe, c.M.B. (eds.) *African international relations*. London: Longman. Cited in Mngomezulu, Bheki R. 2013. Why did regional integration fail in East Africa in the 1970s? A historical explanation. Available at: <http://www.kznass-history.net/files/seminars/Mngomezulu2013.pdf>

⁶⁹ Mugisha, Ivan. 2019. Why intra-EAC trade is dwindling, in *The East African* (citing United Nations’ Economic Commission for Africa data for 2013 - 2017), March 23, 2019. Available at: <https://www.theeastafrican.co.ke/business/Why-intra-EAC-trade-is-dwindling/2560-5038534-uobi5r/index.html>; The EAC Trade Report cites a small increase from 2013 - 2017, but the increase is less than the amount reported traded by South Sudan, which was not included in the 2013 figures. The EAC Trade Reports, supported by TMEA, the use of data from Partner States’ Revenue Authorities, Central Banks and National Statistics Offices. From EAC Secretariat. 2018. EAC TRADE AND INVESTMENT REPORT 2017 Accelerating Market Driven Integration. March 2018. Available at: <https://www.eac.int/documents/category/trade-investment-reports>; Comtrade data show an overall decline from 2013-2017, with no data reported for South Sudan. These data, and those in Figure 3, are used in the TGIS.

Figure 4: International Trade Centre data on intra-EAC trade (excl. South Sudan)


Source: www.TradeMap.org, website of the International Trade Centre

The more positive cases, as well as the challenges listed above, underscore the relevance of the RI project. One reason is the continued national focus on reducing trade deficits through export-led growth and value addition. EAC industry teams work with TMEA in S2 and on their own with a set of export-focused value chains towards improving competitiveness in these challenging environments, with confidence that concerted action among the region provides better opportunities for establishing niche value-add growth centres, as in leather, tourism, and coffee. TMEA and the EAC continue to fit this focus, and S2 is oriented more towards this type of SME-led growth than was S1.

3.1.1.11 Northern Corridor trade challenges from S1 to today

A 2019 World Bank evaluation of support from the World Bank Group (WBG) to trade facilitation cites several factors that appear to be necessary for success in improving trade outcomes,⁷⁰ corroborating 2015 research from the World Trade Organisation.⁷¹ These include a favourable political economy with consistent high-level support; sustained inter-agency cooperation; strong institutional capacity; and interventions that complement one another. Despite TMEA successes during S1, some of these necessary factors have changed significantly since the end of S1 and have put the sustainability of the gains into question. In particular, the increase in port dwell times, 100% inspection and the effects of the SGR have eroded TMEA gains from S1. Recent research has shown that trade facilitation efforts require attention to sustainability in the face of both high-level political economy threats and ground-level rent-seeking, if the outcomes are to be maintained over time.^{72, 73}

A more complex web of events in Kenyan components of the Northern Corridor seems to have negatively affected transport times and costs since the end of S1, from the ports to checkpoints to NTBs and standards. Since the end of TMEA's S1, the Government has imposed 100% verification at the port, dramatically increasing time to import. The advent of the Standard Gauge Railroad (SGR) has shown the limits of Mombasa Port facilities to manage the flow, the precariousness of the investment, and the need for government intervention – at a premium – to make it profitable and pay off staggering debt. An inland container depot is operating beyond capacity and the private sector pays the price in demurrage fees. A new inter-agency anti-counterfeit authority 'much stronger than the line agencies' (according to a Kenyan apex body) has emerged at the behest of the president, with power to overrule standards bodies. And several significant scandals have emerged at the port

⁷⁰ World Bank Independent Evaluation Group. 2019. Grow with the Flow: An Independent Evaluation of World Bank Group Support to Facilitating Trade 2006-17. World Bank Independent Evaluation Group, April 15, 2019. Available at: <http://ieg.worldbankgroup.org/sites/default/files/Data/Evaluation/files/facilitatingtrade.pdf>

⁷¹ WTO. 2015. World Trade Report 2015: Speeding Up Trade: Benefits and Challenges of Implementing the WTO Trade Facilitation Agreement, WTO, Geneva, <https://doi.org/10.30875/1cee73f9-en>

⁷² World Bank Independent Evaluation Group. 2019. Grow With the Flow: An Independent Evaluation of the World Bank Group's Support to Facilitating Trade 2006-17. Independent Evaluation Group. Washington DC: World Bank

⁷³ Raballand, Gael, and Cyril Chalendar, Ana Fernandes, Aaditya Mattoo and Bob Rijkers. 2017. World Bank Governance Notes: Customs Reform and Performance Contracts: Early Results from Madagascar, Governance Notes 2 September 2017.

authority,⁷⁴ revenue authority,^{75,76} and standards bureau,⁷⁷ leading to significant changes in staff and a reluctance to take decisions. All of these have slowed trade and transport processes in 2018, according to multiple government and private sector respondents.

Mombasa Port itself is the locus for several of these post-S1 challenges. Despite close interest from the president and the promise of key financing, the long-awaited work on Berths 11-14 (facilitated by TMEA, and ultimately funded by the Agence Française de Développement and the European Investment Bank) has not begun. A Port Authority staffer reported that the president has said no new projects should start, including the berth upgrades. 'The change of staff at KPA was the major obstacle, and [that of] the Ag MD', according to one donor involved. One element of this is that the county government and the national government are at odds, a state of affairs that is not new but is accentuated by the devolution that grants the county greater local control.

If, as this report and TMEA's RF affirm,⁷⁸ TMEA's efforts in S1 proved effective in time and cost reductions and smoother import and export flows, some private sector apex bodies and logistics firms suggest that current conditions signal a backlash,⁷⁹ in which entrenched interests attempt to regain previous access and advantages. One logistics firm said that when their costs came down from one TMEA intervention, the cost savings could not be 'translated into reduced prices for the consumers because something else comes up – like the new regulations that [bring] additional costs. Whatever is saved is wiped out by other things, like increased demurrage, storage and warehouse rents and removal costs', because of new inland container depot delays.

The authors of a 2019 World Bank study on RI efforts including the EAC, and the World Bank's Committee on Development Effectiveness, noted the continued relevance of the proposed trade outcomes in support of the Sustainable Development Goals.⁸⁰ There is an increasing need for local business opportunities and economic growth in the face of rural-to-urban population shifts,⁸¹ lack of competitiveness and value-addition across the region, and infrastructure needs that governments are not meeting.⁸² Recent EAC Summit attendance, with the exception of Burundi, and openness to the trade agenda on key issues raised by the EABC, shows that the relevance of the programme remains – though integration per se and bilateral challenges continue to affect progress, as noted above.

3.1.1.12 Conclusions

TMEA donors are impressed with the political savvy and relationships that guided TMEA's ongoing planning and implementation. Government partners reported their gratitude at TMEA's ability to flexibly address the challenges that emerged, to adjust timelines, to reallocate funding, and even to mitigate problems before they arose. TMEA works in an intensely political space and have chosen not to document their attention to political economy, but their efforts worked where they continued to have government support. TMEA's multi-donor status and conscious effort to remain neutral meant their work was perceived as aligned more with national and regional efforts than with one or more donors' agendas. Several respondents mentioned that the actual form Brexit eventually takes would likely affect TMEA's goals, but respondents could only say that it would, not that it already had.

Political economy affected TMEA in reaching their impact goals, in large part because of the time it took to resolve issues like the bidder challenge on the Kenya iCMS and the time to gain consensus among Mombasa Port Charter members not just for signatures, but for action planning and monitoring gains. Projects like working on trade policy took longer with government reshuffling, and some policy projects – around standards and NTBs

⁷⁴ Editorial. 2019. Kick Graft Cartels out of the Mombasa port, in The Sunday Nation; The Nation. 2019. Why your favourite imported brands are not on the shelves, in The Nation, February 2, 2019. Available at: <https://www.nation.co.ke/news/Why-your-favourite-imported-brands-are-not-on-the-shelves/1056-4962520-wdwr58z/index.html>

⁷⁵ Fick, Maggie. 2018. Kenya corruption threatens to engulf government, auditor general says – Reuters. June 14, 2018. Available at: <https://www.reuters.com/article/us-kenya-corruption/kenya-corruption-threatens-to-engulf-government-auditor-general-says-idUSKBN1JA1H9>

⁷⁶ Githae, Wanjohi. 2018. Tax avoidance claim hits KRA boss John Njiraini in The Daily Nation, October 7, 2018. Available at: <https://www.nation.co.ke/news/Tax-evasion-claim-hits-KRA-boss-John-Njiraini/1056-4795018-254w25/index.html>

⁷⁷ Okoye, Uju. 2018. Kenya's Latest Scandal Reveals the Bitter Taste of Corruption, in The Diplomatic Courier. June 27, 2018. Available at: <https://www.diplomaticcourier.com/kenyas-latest-scandal-reveals-the-bitter-taste-of-corruption/>; Corruption Tracker. 2018. Sh. 100 Billion -: Tax evasion racket loots Sh100b in six months. August 19, 2018. Available at: <https://trackcorruption.org/sh-100-billion-tax-evasion-racket-loots-sh100b-in-six-months/>

⁷⁸ The reference here is to outcomes achievements as described in the report's sections on effectiveness in the answers to HEQ2. TMEA's RF also claims important outcomes as described in OPM: David G.V Smith, Joel Moktar, Timothy Hobden, Theo Sands, Antony Wahome and Caroline Raes. Workstream 2: Deliverable 2D: Effectiveness and Outcome-level Evaluation SO2 and Deliverable 2E: Effectiveness and Outcome-level Evaluation SO3. Revised Draft. January 2019

⁷⁹ Maina, Wachira. 2017. Time for EAC to lower its sights; throw out federation dream. In The East African, 30 May 2017. Available at: <https://www.theeastafrican.co.ke/oped/comment/EAC-political-federation/434750-3948146-w43lh8z/index.html>

⁸⁰ World Bank Independent Evaluation Group. 2019. Two to Tango: An Evaluation of World Bank Group Support to Fostering Regional Integration. World Bank Independent Evaluation Group, April 15, 2019. Available at: <http://ieg.worldbankgroup.org/sites/default/files/Data/Evaluation/files/Regionalintegration.pdf>

⁸¹ Teye, Joseph. 2018. Urbanisation and Migration in Africa. Centre for Migration Studies, University of Ghana. Expert Group Meeting at the UN in New York. https://www.un.org/en/development/desa/population/events/pdf/expert/28/EGM_Joseph_Teye_ppt.pdf

⁸² African Development Bank. 2019. East Africa Economic Outlook 2019: Macroeconomic Development and Prospects. Political Economy of Regional Integration. African Development Bank Group. Available at: https://www.afdb.org/fileadmin/uploads/afdb/Documents/Publications/2019AEO/REO_2019_-_East_Africa_.pdf

– remain unresolved (please see relevant sections below). Longer-term investments, high-value contracts, and projects affecting political interests (including powerful potential spoilers) like work at the ports, NTBs, and logistics were also slowed. Worse still is when political economy stopped programming in its tracks, as in Burundi and South Sudan, but also, crucially, at Dar Port. MoUs were one tool TMEA used to guard against shifting priorities, but they are no guarantee because governments remain volatile.

TMEA is as relevant in the light of these challenges as ever. Many of the trade and transport issues identified in the original Business Case remain challenging, while the proposed benefits of RI still have economic incentives to offer the participating countries – if, indeed, the partner states continue to seek integration. A February 2019 EAC Summit – though hamstrung by the absence of Burundi’s president – shows that national impetus for RI has not disappeared. TMEA continues to be well-placed and connected in ways that other, more short-term donor projects are not, and in S2 they seek to build both supply and demand for improved conditions for trade. However, the environment for their work has deteriorated, in that Northern Corridor transport times have worsened since the end of S1, owing largely to the developments discussed in this section. Protectionist measures appear more frequent and more intractable. TMEA will need to remain adept in the face of these changes to be able to maximise trade gains where regional integration progress is slowed or stalled. TMEA has already refocused its interventions on trade per se and limiting the degree to which RI serves as a goalpost for the programme. In S2 that shift has continued, with a reduced budget and budget percentage for the Arusha programme. TMEA will need to adapt effectively to the changed environment, by utilising its networks and expertise to adequately address the problems that arise.

SO3 export capability interventions were somewhat less likely to face upheavals in their project management because of political economy events, though they were subject to all those events that affect the population at large, like elections and devolution. Support to private sector and civil society-led policy formulation, and the advocacy work under the logistics component were acutely susceptible to changes in government, whether from elections or reshuffling.

Winners and losers in trade facilitation differ by project and TMEA staffers were familiar with the environments, rules, and challenges in their areas of operation. While TMEA’s scope expands in S2 to new countries and supporting export capability they will, naturally, need to grow to learn more about those spaces as well; this will supplement the new Board or NOC members and local staff they will add to manage new programming. While there is an inherent safety in not documenting political economy conversations where these might eventually be shared, there is a parallel requirement with donor funding for transparency, and TMEA’s system risks being ad hoc or incomplete by virtue of its cloaked nature. The iterative ToC process discussed above and in the recommendations would provide space for regular discussions on these topics, including monitoring political economy assumptions, while the donors will have to provide assurances about the security of their document management if they want TMEA to engage in a more transparent process.

DEQ5.5 Do TMEA interventions complement other ongoing initiatives (both government and private sector)?

The response to this question examines the other initiatives underway during S1 from government and private sector sources, and TMEA’s level of complementarity with these. Complementarity with other donor projects is examined under a separate question, DEQ5.13, below.

Across all SOs and countries there are numerous government initiatives. Private sector initiatives were less common, and only in Kenya and at regional level did they appear to be self-sustaining. Major apex bodies such as Kenya Association of Manufacturers (KAM), Kenya Private Sector Association (KEPSA) and the East African Business Council (EABC) are engaged in efforts to address their memberships’ core issues, and are the strongest such bodies from across the four countries. The EABC respondents said their mandate and that of TMEA were indistinguishable: ‘full implementation of the Common Market, Customs Union, harmonisation of standards in the region’. They added that their members appreciated TMEA in S1 because of that alignment. According to the EABC Annual Report⁸³ in 2016, TMEA funded between a quarter and a third of the overall operating budget, and the TMEA-supported activities included work on standards and on a women in business networking platform.

National apex bodies were strongest in Kenya, and TMEA supported components of their activities while they maintained other work that was funded separately. This was true for KAM’s advocacy work around NTBs and other advocacy goals; and with KEPSA’s work with SMEs, improving Kenya’s Doing Business ranking, and with public-private and political dialogue. As with the EABC, representatives from these bodies reported a high-level

⁸³ EABC. 2017. Annual Report. Available at: <http://eabc-online.com/resources/reports/84-eabc-annual-report-june-2016-may-2017-1/file>

of alignment with TMEA's goals, and praised TMEA's funding critical of areas of interest that otherwise would not likely have been pursued. KAM did, at one point in S1, propose that the NTB Act not go forward without remediation measures built in – in contrast to TMEA's support of the draft. But they continued working together on individual NTBs, on the NMC in Kenya, and on other issues. TMEA's complementarity with these efforts was high, given their shared goals. TMEA also supported the Kenya National Chamber of Commerce and Industry with an improved system for issuing certificates of origin, while that body's other work was not largely focused on intra-or extra-regional trade.

In Uganda and Tanzania, the supported associations had little additional funding apart from that which came from TMEA. Associations representing single sectors in each country reported that their operations were significantly supported by TMEA, such as the national tourism associations; the tea association in Kenya; the Grain Council in Uganda, or freight forwarders in Rwanda and Uganda, and that membership fees from their industry were too limited to maintain consistent projects on their own. In several cases, TMEA's support to these groups – including logistics industry groups – was substantially focused on capacity building, and on advocacy with government bodies. Respondents reported they would continue building the relationships they had been able to make during their time with TMEA; however, most also reported that they would have to scale down if TMEA funding ended.

In terms of government programming, there are some cases where TMEA is claimed to be either the only player or the most significant one. In three countries, respondents from ministries working on East African Community issues reported that only or primarily TMEA works with them. In two of these countries, other agency respondents said the same – one in an Agriculture Ministry office, one in a Health Ministry, one from a revenue authority, and a third a permit-approving agency, where the respondent said, '*Only TMEA that have financed a lot of money.*' In support for RI processes, then, and with other agencies that may otherwise have been left behind, TMEA has stepped in with support that was unlikely to have occurred without that funding.

The degree to which TMEA works to align with agency and government priorities (DEQ5.12, below) is important in response to this question, as the stakeholder communication process is described as 'guided by the government' which appears to have been instrumental in ensuring complementarity. Some, but not all government agencies interviewed, reported other donor efforts in their sectors. These actors were able to use the collaborative process with TMEA to fill gaps, ensuring complementarity, which happened with one country's trade ministry, where UNCTAD work on trade portals was complemented by TMEA following the design process.

Ministries working on EAC engagement were generally not supported by other donors, affording the opportunity for multiple TMEA engagements on different themes: NTBs, standards, and OSBPs, at a minimum. In this case, because there were no donors aside from TMEA, the EAC-related ministries were able to take advantage of these multiple interventions simultaneously, with no risk of overlap or duplication. With some key ministries and agencies, TMEA partnerships were guided by monthly steering committees, which were discussed by partners in evaluation interviews. These were said to be critical for organising partner efforts particularly in EAC-related ministries and in important ICT for Trade projects. One example of the latter was with the Kenya Revenue Authority, which was active both with the monthly steering committee and with the NOC. Other agencies reported less frequent steering committee meetings.

Other examples from the research at PIO level included the integrated Customs Management System (iCMS) development in Kenya, and related TMEA support to a master data centre. The government partner reported alignment of the CMS system with overall national tax collection and the need to upgrade and protect data storage facilities across the government. The projects' steering committee brought in intra-and inter-agency partners throughout the process to assess the broader needs the system had to fit, and to ensure their integration; it was the revenue authority's leadership of the steering committee that allowed this, according to KRA's respondents.

TMEA played an important consultative role for the Government in the advent of the Standard Gauge Railway (SGR), and its alignment with the capacity at the under-construction Embakasi inland container depot (ICD). From early 2015, TMEA met with government interlocutors to propose the importance of commercial strategy around the planned railway, and in 2016, TMEA commissioned a study on that topic. By the end of the year the study was finalised, with stakeholder inputs and validation, to support the Government of Kenya's decisions on the matter, as described by a TMEA staffer involved. While taking part in consultative meetings on various aspects of commercial use planning, TMEA lobbied for greater capacity at the ICD, among other technical inputs per documentation reviewed by the PE team. The Transport Cabinet Minister echoed this argument in an editorial⁸⁴ and expressed concern that the Government did not yet have a plan for competitive freight use pricing

⁸⁴ Macharia, James. 2017. Sound policies, expansion key to realising full benefits from SGR, in The Daily Nation. May 8, 2017.

for the SGR; TMEA respondents indicated that the arguments made were based in part on TMEA's work. TMEA and many government interlocutors were eager to see the SGR brought into a harmonised multi-modal freight transport network that maximised the value and potential of rail while maintaining cost reductions gained in S1.

3.1.1.13 Conclusions

TMEA's interventions complemented government and private sector particularly in areas that might otherwise not have been funded or funded sufficiently. At national levels, RI is a supranational goal, and was therefore less supported than domestic efforts around trade; in this way, TMEA's support can be said to be complementary to those efforts. Particularly the private sector apex body efforts in Kenya and regionally benefited from TMEA's complementary funding for RI-focused initiatives.

3.2 Programme coherence and coordination

DEQ5.6 What are the strengths and weaknesses of the working model observed to date?

The answer to this question examines strengths and weaknesses of the working model identified by TMEA, partners and donor in interviews, as well as those identified by the evaluation team in our analyses. The PE team looked at aspects of the working model – internally (structure, human resources, processes) and in terms of external operations (its fit in the context, ability to operate effectively, focus areas, and strategic adaptability).

Across the evaluation interviews, TMEA's status as a multi-donor programme was considered a strength for two reasons. First, inputs from multiple donors created a significant funding pool that allowed for project and programme planning potentially at a more impactful scale. Partner respondents in government and private sector agreed: TMEA was not the largest donor, but it was much more substantial than most development partners' budgets working individually, giving TMEA a level of funding that could be catalytic on major efforts (berth upgrades, EAC support, development of IT and other systems). Second, having multiple donors gave the programme distance from one or another donor's political agenda. Government partners reported they felt insulated from reporting to multiple donors and had an ally to represent them to the NOCs and at the Council level. This model placed TMEA in the role of neutral broker, in an environment and sector that traditionally have many competing interests.

TMEA parlayed that neutral broker status and its strong staff composition into durable relationships with government interlocutors at technical and political levels. The effort at Mombasa Port to convene twenty-five port-related agencies on a Port Charter, and to garner a presidential signing ceremony, is a notable example. Arguably, however, it was the consistent and dedicated power to convene steering committees for technical projects at more mundane levels (the NMCs, IT for revenue authorities, private sector and government at national and regional levels for standards harmonisation, bilateral OSBP agreements, and other standard bureaucratic efforts) that made TMEA's success in this arena so evident, and coming from so many quarters. Another way TMEA played this role was the donor conference structure around the berth upgrades at Mombasa Port. While TMEA's funding would never be sufficient to cover works of that magnitude, TMEA did have the resources to catalyse the effort with in-depth technical feasibility work and bringing donors together to examine the opportunity in detail. TMEA's size – larger than a typical development programme but smaller than the infrastructure powerhouses – belied its important influence in the sector and made these catalytic investments a good use of funding.

The model is uniquely designed to work at both national and regional levels on parallel issues, as is strongly in evidence with the SCT as described in the following section. This has included work with various agencies in each country, the regional EAC Secretariat, and the political class and private sector, to achieve goals that these partners share in large part. Several of these characteristics comprise a unique model: TMEA being larger than traditional development programmes (and with more donors), remaining neutral, developing deep and broad relationships with governments, and acting as a convener for the breadth of TMEA and non-TMEA donors and actors. While difficult to quantify precisely for its multivalent nature, this has meant TMEA's model has been able to have an outsized role in the trade environment in the region. A 2019 World Bank report on regional integration includes an influence network analysis of the key players in East Africa working on trade. This analysis puts TMEA at the same or higher level of influence than the World Bank itself, despite the WB having greater expenditures in the sector by an order of magnitude.⁸⁵ DEQ5.8 on results that were 'greater than the sum of their parts,' below, further describes the ways in which TMEA's multi-pronged work with governments and the region comprised a uniquely capable model, particularly around the corridor design and the efforts to support the SCT.

⁸⁵ World Bank Independent Evaluation Group. 2019. Two to Tango: An Evaluation of World Bank Group Support to Fostering Regional Integration. World Bank Independent Evaluation Group, April 15, 2019. Available at: <http://ieg.worldbankgroup.org/sites/default/files/Data/Evaluation/files/RegionalIntegration.pdf> p39.

As discussed in response to the DEQs on alignment with government (DEQs 5.5 and 5.12) and EAC trade and integration priorities (DEQ5.3), significant evidence shows that TMEA operated largely as a demand-led model. No development programming can do so completely, given that funding comes from donors with important preferences. But TMEA developed designs and workplans with partner governments and ensured shared commitments, policies, and priorities among those involved. This was so noticeably different for partners that several commented upon the contrast in the interviews: 'TMEA is present for every single meeting. The World Bank come by once every six months', said one port project partner. The evidence from multiple partner interviews indicates this created ownership and long-term relationships that aligned with local systems, two key goals of the Paris Declaration principles. The active and engaged NOCs in each country, with government and private sector leaders holding programming teams to account for progress, were a strong example of this at the project and country programme level. Another set of examples of aligning with local systems is in the ICT for Trade component, in which TMEA staff in the component spoke as extensively about the considered attention to change management as they did about technical specifications of a SWIFT or portal. Rather than seeking the most advanced systems available, the team worked to a standard of 'best fit' for the agency or agencies involved. That tactic had the effect of putting limits on the technological and financial resources required for maintenance and upgrades. Whether agencies went on to fund these systems is discussed in greater detail in responses to DEQs 5.17 and 5.20 on Sustainability, below.

There were, of course, times when TMEA rejected certain partner proposals based on the programme mandate or budget rules; government partners explained such cases, saying that they understood why TMEA did not take them up. This shows good communication on TMEA's part, as well as adherence to rules such as those regarding per diem payments and how donor funds could be expended – the most common reason proposals were reported to have been rejected. The partners who spoke of an agenda more directed by TMEA were those in export capability projects and civil society; one coffee project felt TMEA was rigid in seeking certification, while their cooperative partners were more interested in simply improving productivity. A CSO partner felt that the domestic focus of their work was limited by TMEA's goals vis-à-vis trade, and other CSOs noted that TMEA had not been able to support them fully with key issues of administration, membership, low resource levels, and organisational precariousness. Some CSOs were so small they were actually part of larger CSO bodies' grants, rather than directly partnering with TMEA themselves – creating a distance that could exacerbate the sense that it was TMEA's mandate that mattered, rather than their own. Even a larger CSO, one dedicated to women's development, wished that TMEA supported their core issues better. On the other hand, that TMEA and government partners shared a focus on narrow agency goals and had somewhat less congruence with private sector and civil society partners with more diverse agendas, does make sense. It also reflects capacity building needs among the latter partners, which TMEA was often obliged to address for reasons of due diligence.

TMEA staff were lauded by the counterpart agencies and private sector partners for their technical competency, commitment, accessibility, flexibility, and consistency. Partner respondents rarely had anything but high praise for the TMEA team. Considering the volume and breadth of partner interviews, this is quite an accomplishment. Specifically, the evaluation team heard that TMEA staff listened to partner needs and worked to fill them even in the event of changes during a project's lifetime, where this was possible. TMEA embedded technical team members at the EAC and in ministry and agency projects, which provided consistent steering and even peer capacity building in project management. TMEA staff tend towards longevity, in part because TMEA offers opportunities for their own professional growth and self-directed leadership; it is also related to the internal perception that TMEA is not a development programme, but an ongoing institution, promulgated by leadership. Staff longevity is an invaluable programme resource, and also allows staff to take advantage of capacity building opportunities within their roles.

The evaluators were in the field well into S2, allowing glimpses into how the programme has evolved since the end of S1. One important change was put into words by a donor interview: in S1, TMEA worked on 'building the pipeline' for trade, or following the corridor rather than the products, to assure systems were in place for the flow of all imports and exports. SO3 efforts to 'fill the pipeline' with national exports were a fraction of investments. S2, on the other hand, is working about '50-50' – building and filling the pipeline, according to a donor who works very closely with the programme. The 'fill the pipeline' angle starts by looking at the products, rather than the corridors, to uncover where important value chains get stuck geographically, chronologically, with inputs, with certifications, whatever those obstacles might be.

This 'pipeline building' focus of S1 may well have benefited larger firms and importers more than SMEs, given that the former have greater resources and access, as well as the profit motive, pushing them to use systems

that were created. SMEs,⁸⁶ whether exporting or not, have more constraints and barriers to entry or to take best advantage of the pipeline. Import growth during S1 likely provided strong competition to national products, particularly since many value chains in the region have not yet had success in adding value. These issues will be explored in the TGIS in the coming months; for purposes of the PE, we would not yet call it a strength or a weakness, but we do note the shift to greater attention on facilitating exports in S2.

The TMEA model is influenced by the private sector and has many of its qualities such as efficiency and high expectations. Unfortunately, the partners and the political economy environment do not always function predictably or produce expected results, and certainly not within the planned timelines. Many S1 projects were extended, and for some there were costs attached.⁸⁷ When TMEA staff and partners talked about project timelines, the PE team heard they were 'one year' and 'two years' (with the exception of major infrastructure undertakings); but timelines should be more tied to realistic assessments of what a given project is up against, rather than artificial boundaries based on the PAR system.

High expectations were also not met in terms of partner capacity. Projects supporting national government agencies, EAC teams, associations and organisations were routinely slowed by capacity gaps. Despite attention to capacity in the PAR process, it was a constant challenge that so many private sector and civil society partners required specialised TA. In addition to general capacity challenges around finance, monitoring and evaluation, when leaders left these organisations in three instances, projects stalled. Government partners also participated in capacity building, but turnover was the greater part of the problem in those cases. This calls into question TMEA's ability to assess capacity levels, design projects that work with present capacity levels and/or build capacity to keep pace with programming, and work to build institutional as well as individual capacity for sustainability.

There was an approximately even split between respondents who said TMEA's processes for procurement and decision-making were fast and efficient, and those who said the processes had held up projects. This was not, as one might expect, evenly split between HQ and country programmes, lamenting centralised processes in Nairobi, though that was certainly mentioned. In fact, it appeared that the earlier a project began in S1, the more likely they were to have a positive view on procurement and decision-making, whether in HQ or the country programmes. One country staffer suggested this was because of the switch to a slower Board approval structure during S1, and a resulting increase in internal bureaucracy. SO1 project partners were unlikely to report delays because of internal TMEA procedures, which seemed unlikely because of the greater due diligence among infrastructure projects. It may be that these actors were simply primed for a more deliberate and slower process.

The scope of the development problems in trade does present challenges for TMEA, despite its size and funding, and its ability to focus donor and partner attention. One stark example involves the many agencies with which the ICT for Trade component could work, to facilitate trade processes such as granting permits. The HQ component lead reports that there are 170 such agencies across the region; in S1, they managed to automate some part of the processes of 45-50 of these and hope eventually to reach 100 in S2. The PE team found the component very effective, but those figures do remind that there is prioritisation. Moreover, in many agencies that were part of S1, only the trade-related functions were always automated. Many – in some cases most – other functions in given agencies remain manual. This is reflected in users' reports about them: some, though not all, are nonplussed about the improvements, even when these are recognised. At least one of the automated systems has not yet been embraced by the agency for whom it was built. In another country online payments were not part of the upgrades, despite significant positive local experience with mobile money. Problems with interconnectivity still occur somewhat regularly at borders, according to private sector respondents, among them AEOs. And there continue to be those within the systems who find ways to work around them to continue rent seeking. The breadth and depth of the set of problems TMEA is working to overcome with these systems risked eroding their achievements. This is not a weakness of TMEA's model per se, but it does constrain outcomes.

3.2.1.1 Conclusions

TMEA had good internal functionality, with a technically strong team, and procedures that ensure compliance; the latter did seem to have slowed with the late-S1 change to a Board and Council structure. This is more thoroughly examined in DEQ5.11, below. TMEA worked with government partners and some from private sector, civil society and export capability projects who had significant unmet capacity needs. This affected timelines and outcomes. TMEA adapted to these, but the timelines were ultimately dictated by some of these weaker partners.

⁸⁶ Using the World Bank SME definition, some 98% of businesses in Kenya are SMEs; they are the biggest part of the economy in most of East Africa, and are the engine for job creation. From Sigwart, Philip. 2017. Q&A, Equity Bank, and Invest in Africa. Available at: <http://www.investinafrica.com/Uploads/contentuploads/6832e641-f713-4e64-bb9e-afa07568d48f/file.pdf>

⁸⁷ DFID. 2017. Trademark East Africa Due Diligence Report. August 2017. Africa Regional Department and DFID East Africa Offices. Prepared by Deloitte and Touche Kenya

TMEA's outsized influence meant they operated at a level that was beyond individual, one-off bilateral efforts and were able to take a longer view, and propose more ambitious goals, while simultaneously pursuing support for them (the 'catalytic' investments). This is even more critical in S2 with the efforts to 'fill the pipeline' with stronger national production and exports, because working on individual value chains would not be sufficient.

Being a multi-donor programme, and following a demand-led model, TMEA was able to fit into its context well and establish durable and consistent relationships with partners – a key strength of the model. The TMEA model has been particularly effective due to working at national and regional levels, working across agencies within governments, and focusing on holistic efforts like the corridors and the SCT (which is discussed as well under DEQ5.8, below). An overarching challenge that TMEA faced in S1 and will continue to face in S2 is dealing with the systematic scale of problems like multiple, overlapping agencies seeking ICT4T support, or the unaligned quality infrastructure between the EAC Partner States. These challenges of scale are obstacles to sustainability.

DEQ5.7 Is the complementarity and coordination between national and regional levels optimal throughout all programme components and activities?

The response to this question examines how TMEA's national and regional levels work together when they share goals but have very different contexts in which to reach them. The evaluation team explored the characteristics of projects in which challenges arose, which were primarily in SO1 where strict HQ oversight and additional technical staffing led some infrastructure and catalytic investments. Since the response to this question relies primarily on TMEA staff interviews, the PE team also evaluated the frequency and specific concerns around HQ leadership against the generally accepted and lauded matrix management structure.

Some country office representatives continued to report, as in earlier evaluation studies, that they would have preferred greater technical control over programming, and over budget decisions. Country office staff are most often local citizens, and claim greater contextual knowledge that supports their technical expertise.⁸⁸ Reaching out to Nairobi team members was said to be time-consuming and decontextualised by SO1 and SO2 staff: 'their knowledge should complement ours, not supersede it', said one. The strength of the NOCs was also said to suffice for the oversight role, while the matrix management system was a burden without consistent value added. An SO3 team member cited 'problems' when the HQ component lead visited projects, because partners 'didn't know who was in control of the activity' and questioned the HQ staff member's authority.

One technical advisor called for country directors to have more unfettered control over project activities, but in another country it was reported that the OSBPs were now directly linked to country-level portfolio directors, allowing a clearer and more efficient approval design. In the latter country several responses indicated a more comfortable coordination relationship, in which another team member appreciated HQ Results Team support with 'setting baselines and working on mid-term and end-of-project evaluation.' Again, in the same country, a technical team member felt the NOC meetings feeding into the Board's decision-making flowed well.

Responses at HQ were more positive: 'Coordination is improving', according to one leadership team member, because 'governance structures existed at country level but previously the linkage with the Board and Council was non-existent.' Efforts to improve Board oversight were said to have resulted in better and more consistent programming.

These two perspectives have always co-existed in programmes and firms as well as government agencies that are configured with a hub and spokes. One way in which TMEA has succeeded at empowering country programmes is through the NOCs, which are vibrant and active bodies with high levels of ownership and mutual accountability. Programming staff feel empowered to speak to NOC leadership about ways systems inhibit progress of interventions, while the NOC leadership holds programmers to account for project advances. NOC leaders from government and the private sector are also reported to be well-placed for problem-solving.

Matrix management⁸⁹ has been a standard of which TMEA leadership are proud; previous OPM evaluation work⁹⁰ has pointed out the benefits and found team members optimistic about its utility. The 2016 Annual

⁸⁸ One exception, according to respondents, is the small South Sudan team, working from Kampala since the insecurity in 2016. 'Had they been locals, they could have stayed,' reported one partner, who felt that having local staff would reflect greater commitment and allow for more transparency: 'All our procurement happens away from here... [including] budgeting and planning, which adversely affects our NOC.'

⁸⁹ From OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming): The structure is comprised of three specific roles, operating at both regional and national levels, for TMEA staff members within each project: 1) A Portfolio Director reviews the Project Leader's work plan and budget, monitors progress, performance and plans of projects within his or her portfolio, and is the primary contact for high-level stakeholders, especially at a political level. 2) A Project Leader is responsible for ensuring successful delivery of the project, full achievement of project outputs, for the day-to-day management, and for the approval of invoices, purchase orders and other project control documentation. 3) The Technical Coordinator provides technical advice to the project team in support of successful project delivery and undertakes a quarterly Q&A review of projects.'

⁹⁰ OPM. 2018. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment, p. 24-25.

Review agreed, as did the 2017 Due Diligence study⁹¹, in broad terms. Some suggestions were made about the importance of clarifying roles, particularly in larger projects with a greater number of technical actors. The evaluation team noted that, for some components, technical guidance from HQ might be less relevant, where the workplans differ distinctly.

Standards, for example, worked more on harmonisation and an EAC-focused agenda, while at national level the standards projects focused on equipment and training, and in some cases outreach to the private sector to improve standards performance. The evaluators felt the harmonisation work would have been strongly served by dedicated work at the national level to ensure mutual recognition of the agreed standards at the borders. NTBs work was more aligned around the Time-Bound Matrix, but the regional team might have helped national efforts more by ensuring the NTBs Act was amended to include a formal avenue of redress. In export capability, some projects were run nationally (staples), others regionally (coffee), and one a hybrid (tourism), offering a natural experiment about which method worked best. Regional programming was valuable for its efficiency, while national offices appreciated the scope to oversee country-level projects. With the hybrid model TMEA had the efficiency gains but also more country engagement on necessary technical decisions because they felt ownership of the project, according to one report. Close technical supervision from HQ is sometimes more called for, as in ICT for Trade, where systems are developed with close oversight from the HQ team (requiring frequent travel) and the country staff member's role is more about coordination with the respective agencies. The matrix was flexible to accommodate these kinds of differences, where reporting upward through multiple levels varied, by the actual need for those layers.

Large-scale infrastructure projects, as covered in the matrix, presented more challenges for the line of reporting. Because of their complexity and technical requirements, external consultants were sometimes hired at HQ and added to the mix of roles, with some resulting tensions around decision-making. National contextual knowledge is central to progress on sensitive issues at ports, for example, and appeared to be at odds at times with leadership guidance from HQ. OPM's organisational and institutional assessment report found 'no visible difference in authority levels between national and technical directors' and recommended a review of roles and responsibilities under the matrix management system, particularly for projects in SO1.⁹² The aCatalyst Consulting report in 2016 on the preferred structure for S2 reported broad consensus on the utility of the matrix management structure, but recognised the need for flexibility with regard to large projects, expansion, and national technical expertise.⁹³ The latter report offers an S2 scenario that goes even further, providing greater autonomy to country programmes as the TMEA institution grows. From that evidence, and the local reports that matrix management does not always leave country actors feeling empowered, there may be additional changes that TMEA could consider for future organisational design.

3.2.1.2 Conclusions

TMEA teams at national and regional levels coordinated their joint efforts through a matrix management system. At the same time, there is some operational independence that is guided in each country by the NOCs, whose positions in the trade sector (both public and private) help to ensure project success in local contexts. Having the NOC decision-making feed into Board deliberations at the central level appeared to have improved the degree to which TMEA HQ leadership viewed country programme operations. Large infrastructure projects and others with exacting technical requirements appeared to cause somewhat more friction, where local technical expertise was superseded from HQ. In other programming, however, country programmes worked more autonomously, particularly where goals differed at the two levels. With smaller teams at national level, there may indeed be technical gaps that must be filled, but the small teams also bring the benefit of strong cross-component knowledge (please see also the response to DEQ5.8, below) that can be drawn upon for contextually-appropriate solutions that might not arise from a consultant arriving from HQ. Components were not all the same, and where greater contextual and local technical knowledge was necessary – as around growing seasons, markets, etc. – greater country ownership was called for. Some highly technical projects did better with HQ leading and project management support at country level.

DEQ5.8 To what extent does the TMEA model bring greater results than the sum of its parts? How could this be strengthened?

For this question, the evaluation team examined the synergies that emerged in S1 programming and opportunities where that might have been pursued more. During S1, TMEA's small country teams worked synergistically across SOs. The 'enabling' components of strengthening the EAC and the SCT, supporting

⁹¹ DFID. 2017. Trademark East Africa Due Diligence Report. August 2017. Africa Regional Department and DFID East Africa Offices. Prepared by Deloitte and Touche Kenya, pp. 28-29.

⁹² OPM. 2018. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment, p. 25.

⁹³ aCatalyst Consulting. 2016. Organisational review: Phase 1 Report, Developing the Preferred Organisational Structure and Staffing. 17 June 2016, pp. 13-14.

private sector advocacy, and women in trade were synergistic by design. Earmarking had a deleterious effect on synergies while core funding better met the interrelated needs dictated by the ToC.

The TMEA ToC gives the impression of components working in complementary and mutually beneficial silos, but the evaluation found ample evidence of synergies between activities and components. This is not surprising, given the interlocking nature of proposed outcomes in time and cost reductions, the comprehensive engagement across the trade sector with governments and private sector alike, and the interrelatedness of SO1 and SO2 components in achieving the gains for the governments range of firms using the corridors. An example was the natural synergy between ICT for trade interventions on national customs management systems (CMS), and the integrated border management (IBM) implementation at OSBPs. OSBP team leadership cited the team's work with the Women in Trade team, to leverage gains and make sure social welfare was included in planning. Their joint familiarity with the OSBP concept, on the one hand, and different perspectives due to different specialities, on the other, meant that joint inspections and management meetings resulted in different dimensions of the being brought to light to identify and solve problems quickly. A further example comes from a TMEA staffer working on SO3, who credited the joint border committee structure as serving to synergise efforts to help traders across the spectrum of trade facilitation needs. The results of these efforts – taking best advantage of TMEA strengths – are greater than the sum of the parts, in ensuring the inclusion of cross-cutting gender issues in TMEA training materials, for example, and the interoperability of systems to serve newly upgraded OSBPs.

Another example within SO1 was the formation of a small group of businesspeople to comment on the design of one of the port programmes, according to a TMEA HQ leader. The teams communicated regularly within TMEA and ensured their partners were interacting as necessary for piloting and rolling out systems integration. Trade policy partners in another country at ministry level were brought together with TMEA ICT for Trade implementation on single windows, to provide inputs. The parastatal running that country's SWIFT commented independently that TMEA engaged a range of stakeholders to 'ensure we all fit everyone's needs and the end objective.' A TMEA-supported platform in another country brought together private and public sector to examine the best ways to harmonise standards, and to prioritise their efforts. These platforms resulted in greater synergies than without such efforts, because of the inclusion of external voices in decision-making, while also ensuring that users would be prepared for ICT for Trade upgrades.

The evaluation team found that synergies were purposeful, rather than coincidental. Team members in country and HQ offices discussed in detail their efforts across components and countries, in a range of examples. The 'enabling' components of the ToC are perhaps the strongest and most visible of these: PIO 2.1 Strengthening EAC Regional Trade Integration; PIO 3.1.1 Private sector and civil society-led policy formulation (advocacy); and 3.1.2 Improving processes for traders, especially women. Results team efforts also crossed SO boundaries, calling research at ports and border posts 'inherently synergistic', as they were measuring the results of efforts from across TMEA's components.

Under PIO 2.1, Strengthening EAC Regional Trade Integration, there are obvious synergies from national to regional level – standards, NTBs, Customs integration, electronic cargo tracking, and aligning OSBP procedures across the region. What is also apparent from the fieldwork is the engagement at EAC level – shared and bolstered by TMEA's team in Arusha – for looking at the bigger picture of the Single Customs Territory (SCT), the Customs Union (CU) and the Common Market Protocol (CMP). The EAC project focusing on monitoring results and the regional IFC effort to create a CMP scorecard provided visible and concrete connections between the TMEA components. Similarly, the EAC Time Release study on the Northern Corridor links the SO1 infrastructure project elements and the EAC Trade Report efforts brought together data for decision-making around the key performance indicators that are often parallel between the EAC and TMEA, and that correspond to distinct TMEA components. Private sector advocacy work with the East African Business Council (EABC) also represented this spread of themes around the Customs Union and Common Market Protocol: standards, NTBs, industrial development, and improving processes for traders, especially women. The Central Corridor Transit Transport Agency also reported cross-component synergies that emerged from working toward the SCT. Building programming around the common RI elements – the SCT, the CU and the CMP – created synergies among activities that might have been less holistic had they been undertaken piecemeal by different donors.

These efforts represent a coordinated effort around the concrete requirements of the SCT, as did the national-level responses within the ministries working on EAC affairs, and TMEA's multi-faceted work with them particularly on NTBs, OSBPs, and policy. The presence of outcome-level RF indicators that reflect SCT goals also promoted a more unified perspective than that of the SO pillars, in that more than one component would have to be successful to meet them. The multi-sectoral NOCs were also a place where projects and participants cross-pollinated: 'Having a NOC that was representative of partners and donors introduced synergies', reported TMEA leadership in one country.

PIO 3.1.1 working on advocacy is an often-cited example of the cross-component perspective TMEA actors reported. In one high-profile case, Mombasa Port projects had difficulties with the Dockworkers' Union until the advocacy team was brought on to provide technical assistance. In other examples, key private sector apex bodies gathered and presented evidence to government in the effort to eliminate NTBs. EABC and national private sector partners participated in workshops on harmonising standards. In another example, country staff affirmed that ICT for trade, standards and advocacy team members worked together to ensure 'all information needed to cross the border' was part of their design for the related projects. Using SO3 advocacy efforts to bolster other components was a successful TMEA effort to employ their resources towards common goals.

PIO 3.1.2 is cross-cutting in nature, in that the mainstreaming of gender into trade thinking is necessary and the work with women cross-border traders has made this clear: 'Now, IBM will automatically ask how women are impacted on joint border committees, and bring women in trade networks into these. They have an eye on it now all the time', said a component lead. Conceptualising gender mainstreaming for some components was more challenging (infrastructure and ICT for trade among them), but a gender study and consistent donor attention to the issue helped to keep the agenda on the front burner, if not always backed by resources: 'The gender work is too unbalanced in favour of [women in trade], but mainstreaming is harder, and the resource isn't there. [...] The incentives are not quite there to think it through', according to one donor respondent at regional level. Another staffer worried that gender in a particular component – logistics – was not getting the attention it deserved from the Board. While mainstreaming met challenges in a cultural environment where gender is not a priority, TMEA made solid efforts to bring the issue to the fore in a range of activities. Please see also Chapter 3.5 of this report on Gender for more details.

The structure of TMEA at country level is smaller than at HQ, which may make staff members' tasks extensive, but with a small number of people focused on a given SO – often just one, or even one person responding for two SOs – staff are likely to see potential synergies within SOs. Within given offices, staff members' common knowledge meant that one staff member could step in to give training in place of another. The small teams, longevity of staff, career advancement around the organisation, and close working relationships create a fertile environment for thinking across SOs with peers. An SO2 lead with responsibility for OSBPs in one country then became country director, having come to the country office from a closely related government agency. An HQ Results team member became the deputy in a third country. The longer-term nature of the TMEA programme and the strengths of its team members thus created space for them to grow and contribute more fully to organisational goals, while working collaboratively across SOs, especially in country offices. One way to strengthen synergistic work in the future would be to empower country teams through an active leading role in component-level ToC planning, to build from their local knowledge of emerging opportunities for synergy.

One donor commented that earmarking seemed to create silos, while the core funding they provided was better for ensuring TMEA went forward with an integrated ToC. A TMEA staffer noted that not all donors funded staff salaries and overhead costs at the same levels, and that earmarking limited flexibility across countries. Another HQ-level donor mentioned the synergies between the SOs because of the supply and demand relationship between them: 'Unless you have private sector engagement and buy-in, the infrastructure and policies would not work.' This comment underscores the shift in S2 to more export capability support through logistics hubs, as mentioned by a HQ leader in inclusive and sustainable trade, which itself is a cross-component perspective on trade.

On the other hand, SO1 and SO2 were far more substantial than SO3 in S1, at a ratio of about 6 to 1 by expenditure. This, according to TMEA respondents, reflects long negotiations with the donors who preferred that the export capability projects be kept smaller as 'pilots'; both the later timing and the smaller design, then, were part of donor preferences. Some TMEA donors also expressed concern that working in export capability was beyond TMEA's remit – an issue discussed in more detail in Annex J. However, the net result of building a more accessible pipeline, if domestic businesses are not exporting more, is to enable imports – which would not tend to support pro-poor goals.⁹⁴ S2 programming appears to have a greater focus on filling that pipeline with nationally produced and value-added goods, representing an effort to take best advantage of the pipeline created in S1.

3.2.1.3 Conclusions

TMEA's country teams were loci of synergies as they supported each other across the entire portfolio. Cross-cutting Women and Trade, SCT-related, and advocacy programming was an important source of synergistic programming that generated greater gains together with direct components than either would have had in silos.

⁹⁴ World Bank Group and World Trade Organization, 2018. Trade and Poverty Reduction: New Evidence of Impacts in Developing Countries. World Trade Organization: Geneva.

Core funding, rather than earmarked funds, funded the interlinked ToC more synergistically. National and regional component activities in Standards and NTBs could have been more synergistic by linking their goals more explicitly, as suggested in the response to DEQ5.7. Efforts to bring private sector experiences to bear on public sector programming, as suggested in the example in this section, could also be carried out in other components to ensure the wider needs of traders are part of complex issues like productivity improvements and systems integration. The supply and demand between SO1 and SO2 on the one hand, and SO3 on the other, could be more synergistic by being more evenly funded, as has been done in S2.

DEQ5.9 Is using one organisation – a not-for-profit company – the best vehicle for impact on trade, and on poverty reduction through trade? What are the strengths and weaknesses of this approach?

This DEQ examines TMEA’s not-for-profit Company Limited by Guarantee – one of a class of organisational structures referred to as a Special Purpose Vehicle (SPV) in DFID’s Smart Guide for Special Purpose Vehicles⁹⁵, which served as part of our assessment framework. The Smart Guide identifies strengths such as development and concentration of expertise, corporate governance, and the ability to strategically pool funds and weaknesses such as the costs of setting up SPVs versus funding an existing partner. The evaluation team explored the decision-making around this structure and its likely alternatives; the structure’s fit with TMEA’s internal needs and external goals; strengths and weaknesses in of the model in operation; and considerations for TMEA’s future.

For DFID, an SPV ‘can be a useful vehicle to promote a focused approach with private sector-led principles of flexibility, responsiveness and specialist expertise’ and is apt for interventions seeking to make systemic impact by ‘develop[ing] into a durable platform’ where local expertise can advocate where a UK government intervention would be less successful.⁹⁶ SPVs can be flexibly designed to adapt to new evidence and new priorities from donors, ‘especially for programmes that are breaking new ground, have uncertain results chains, or otherwise need to be adaptive.’⁹⁷ These characteristics are definitional for TMEA. An SPV also allows for purpose-built governance to meet a programme’s particular needs, pooled multi-donor funding, and regional activities across various countries and/or actors. Importantly, an SPV limits donors’ liability, and being subject to regulation.

Over the past two decades, goals and modalities for development work have changed substantially, exemplified in Making Markets Work for the Poor (M4P) approaches that ‘support market actors to implement changes’, rather than more direct donor delivery of change.⁹⁸ This evolution was underpinned by the Paris Declaration (2005) and the Accra Agenda for Action (2008), which require greater attention to donor coordination, aid effectiveness, and country ownership. By shifting towards a more facilitative, catalytic role, different types of organisations are more agile and adept for the job.⁹⁹ A 2014 study of eight MP4 projects in the financial sector found the M4P approach required certain characteristics not commonly found in direct delivery interventions: ‘a) facilitation, not direct delivery; b) flexibility, responsiveness and tailored implementation approaches; c) unique and specialist skill sets; d) managing risk through a portfolio approach; e) consistent focus on results; f) a long-term and strategic perspective’.¹⁰⁰ These characteristics resonate with descriptions of TMEA: they are primarily facilitators; they rely on flexibility and responsiveness for their demand-driven model; they are trade and country specialists; TMEA focus on results; and their perspective is longer term than most development programming. From the outset, then, TMEA required a type of organisational establishment that serves those characteristics.

The decision to be a Company Limited by Guarantee. At the outset of TMEA, DFID and other donors had a choice to make about how to set up the organisation.¹⁰¹ Development programmes organise themselves in different ways – trusts, foundations, grants to NGOs, contracts with consulting firms, or not-for-profit companies (a Company Limited by Guarantee – CLG – in English legal tradition) – based on programme needs. Having multiple donors added complexity to the decision, in that the resulting status had to permit funding from different sources, meet donors’ compliance rules and regulations (which may contradict or conflict), and allow donors to have a strong voice in programming. The legal status also had to allow TMEA to work both regionally and through country offices, be resilient in the face of changes in government, and implement programming

⁹⁵ This paragraph draws on the DFID Smart Guide for Special Purpose Vehicles, June 2018, pp 2-4.

⁹⁶ Ibid, p. 2.

⁹⁷ Ibid, p. 3.

⁹⁸ Kwena, Dennis (updated 2018). Portfolio Board Paper, ‘Lessons and recommendations on how DFID can better engage with Special Purpose Vehicles/Organisations (SPVs/SPOs) in future’, p.1.

⁹⁹ Ibid., pp. 2-3.

¹⁰⁰ Ibid, p. 2.

¹⁰¹ This process presupposes the decision to create an institution rather than funding country governments or the EAC itself. Given the risks in direct budget support, and the limited staff capacity in the EAC, those options were previously discounted.

effectively and efficiently. DFID also had to choose where to incorporate – in the UK, or one or more of the programme countries.

Ultimately, TMEA became a not-for-profit, Company Limited by Guarantee (CLG) and incorporated in Kenya, with headquarters (HQ) in Nairobi and branches in Uganda, Tanzania, Burundi and South Sudan, and a subsidiary in Rwanda, plus the EAC programme in Tanzania. The term Special Purpose Vehicle (SPV) is also used to describe TMEA's organisational structure, though an SPV can also be a trust or an NGO. The model therefore serves important donor interests in terms of permitting multi-donor funding and establishing offices in multiple countries, retaining influence over programming, allowing adaptive decision-making in portfolio projects, and establishing an arm's-length relationship. Respondents for this question included TMEA insiders and donors, government partners, and knowledgeable informants from other programmes.

The CLG decision emerged from close consideration of the positives and negatives of the options, according to respondents who were involved. An NGO was thought to be susceptible to changes in government, while consulting contracts were considered too rigid and time-bound, as well as having higher management costs and a profit incentive.¹⁰² In any case, the choice had to be able to be implemented in various countries, and the DFID Smart Guide on SPVs notes that this is a strength of SPVs. This left either the CLG or a Trust – both of which have been used with other DFID multi-country, multi-donor programmes.

Both models could work, in terms of being set up in the EAC countries, though the figure of a trust did not exist for either Burundi or Rwanda (which are based on French jurisprudence rather than English). In a trust, the fiduciary function is outsourced to experienced and disinterested trustees, who set up systems to manage risk and react to problems or issues that arise. This works, according to the CFO of an organisation with a trust arrangement, when the trustees are doing their jobs well, catching problems early, and finding resolutions. The strategic or implementation side of the operation can then focus on programme logic and strategic direction, as well as on executing or implementing their programmatic decisions. CLG/SPVs and trusts represented in the sample¹⁰³ said that reporting to one body, rather than to individual donors, was a critical benefit of pooling funds.

One way in which a trust could flounder is if the trustees are more risk-averse than the strategic team, or if they work on a strict "set script" that "looks good on paper" but might be less willing to take calculated risks than the programme design may require. "Lots of time can be taken trying to de-risk," said one CEO. Development programming may plan to take calculated risks (as is the case with TMEA), which could upset the balance between operations and strategy on one side, and overly cautious trustees on the other. The CEO noted that the viable firms for such agile and applicable trustees in the region are few. The available firms might also not have offices in each country in the region where the organisation plans to work.

Strengths and weaknesses of the model. TMEA avoids potential misalignment between strategic direction and fiduciary oversight by having a bespoke risk control function in-house, which a range of respondents felt was warranted by the scale of TMEA investments and its broad portfolio of activities from trade infrastructure and trade facilitation to Women and Trade and private sector advocacy, some of which were experimental in nature. The flexibility allowed by an SPV to 'break new ground' or to have uncertain results, and to create appropriate governance structures, are all cited as strengths of the model in DFID's Smart Guide.¹⁰⁴ Risk control management within an SPV must be carefully planned for and executed, said one respondent, making reference to Trademark South Africa, which was closed in March 2014 following 'deficiencies in governance, financial management, procurement, value for money and transparency of spending' in an ICAI report.¹⁰⁵ TMEA has made efforts to improve this function, in response to the 2017 Due Diligence study¹⁰⁶, and OPM's 2017 Organisational and Institutional Assessment.¹⁰⁷ The strength with the CLG is that TMEA can establish and improve on this function through thoughtful external and internal processes; had TMEA been a trust, the trustee relationship would be more challenging to modify.

According to DFID and TMEA respondents, the CLG/SPV also has the effect that TMEA are seen as 'trade facilitators providing expert services', which the Smart Guide references as another important strength of the model: 'Development and concentration of expertise'.¹⁰⁸ In addition, TMEA is not 'too linked with one or another

¹⁰² Kwena (2018), pp. 4, 7.

¹⁰³ Those commenting on this DEQ included current donors, TMEA leadership, leaders of DFID and other programmes in the region with similar or different status, and DFID staff particularly familiar with making this decision, for TMEA or in other contexts.

¹⁰⁴ DFID. 2018. Smart Guide: Special Purpose Vehicles. BDD/PD/SD.

¹⁰⁵ Independent Commission for Aid Impact (ICAI) 2013. Report No. 30. "DFID's Trade Development Work in Southern Africa".

¹⁰⁶ DFID. 2017. Trademark East Africa Due Diligence Report. August 2017. Africa Regional Department and DFID East Africa Offices. Prepared by Deloitte and Touche Kenya.

¹⁰⁷ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

¹⁰⁸ DFID. 2018. Smart Guide: Special Purpose Vehicles. BDD/PSD.

of the donors,' or with one or another political agenda or 'susceptible to the politics of aid'¹⁰⁹. They can work at every level, from the EAC Secretariat to national governments to private sector and civil society, based on their institutional set-up. According to a development bank economist that has worked with TMEA teams, 'The SPV model is positive as it creates more engagement by local beneficiaries and has better access to its clients and is concerned about results'. Donors can and do fund through the TMEA mechanism and can earmark their funding per their interest areas, as Canada has with Women in Trade funding for S2. However, Canada's funding is not tied to UK government due diligence requirements as it might have been with another arrangement. Belgium cannot fund TMEA as a "company", despite it being not-for-profit; their funds have gone through DFID instead. That was not a major concern, according to TMEA leadership. Overall, the CLG worked to pool donor funding (another Smart Guide strength of SPVs) and to be seen as a neutral broker of Aid for Trade in the region.

Challenges with the multi-donor function include unpredictable changing funding levels and monitoring earmarks at a great level of detail, for reporting to different funders. Earmarks were cited as problematic in the 2016 and 2017 DFID Annual Reviews. In evaluation interviews, respondents had various concerns with earmarks: the challenges of monitoring the earmarked work separately, the tendency for donors to drive programming priorities when they earmark, and the resulting focus on coastal rather than land-locked countries. However, these challenges emerge from donor priorities, not from the CLG/SPV design. Two respondents working in trusts discussed the same kinds of challenges under their system.

Absent trustees, TMEA's CLG manages its strategic functions through a Board and a Council of donor representatives at the corporate level, along with a Programme Coordination Committee (PCC) which reports to the Board particularly on the relationship and regional programming with the EAC Secretariat. This system¹¹⁰ allows donor representatives to be involved but without the responsibility of Board membership. Board members are, in the main, private sector leaders from East Africa who bring extensive networks in the public and private sector, which plays a supportive role for management decision-making. OPM's Institutional and organisational assessment found that the Board's membership was a success factor, because their private sector experience generated credibility.¹¹¹ Donors were able to exercise continued influence, such as to ensure that TMEA undertook programming around poverty and gender, though this would likely have been a characteristic of any other model that had been chosen.

Each country programme also has a National Oversight Committee (NOC) comprising key national public and private sector partners, donors, and civil society, and responsible for strategic guidance and performance review, and reporting to the Board. Public sector partners praised this structure frequently in country-level interviews, which "strengthens national ownership", enhances accountability, and engages stakeholders deeply. A TMEA headquarters leader felt this design made them 'think more like a company, [it] makes us more business-like, commercial.'

Procurement is an important issue for all development programmes, and TMEA's system based on its CLG status simplifies the process, according to a DFID respondent and various government partners. DFID's own procurement is reportedly challenging and bureaucratic, but there is a risk that without DFID directly approving expenditures, an organisation does not have the same incentives to control value for money. A DFID respondent cited that SPVs have gotten into trouble with procurement, such as with travel and entertainment costs; one DFID education programme was closed for poor procurement management; another programme ARC (Africa Risk Capacity) followed UN salaries which were seen as well above an acceptable range; and the case of Trademark South Africa which was closed as well. The Council made TMEA itself reduce salaries by as much as 20% after a Salary Survey. The TMEA Council also had a conflict about whether Board members should be paid, which adds to costs; however, committed, useful Board members with strong networks and the ability to plan and implement strategy may not come free. Some evidence was found of Board participation in NOCs in the countries where they reside, suggesting that the recommendation from OPM's Organisational and Institutional Assessment¹¹² had been taken up at least by some Board members.

The CLG status is favourable for longer-term projects, and for sustainability, as cited in the DFID Smart Guide. It is not designed to be started up and shut down quickly, as often happens with contracted firms. For this reason, staff have greater job security and a sense of a career path, likely convoking stronger commitment than would be evident with a traditional development contract. This favours attention to long-term programming goals, such as regional integration, institutional reform, economic growth and effects on poverty and gender with direct and long-chain interventions. Staff longevity appears to be the general norm at TMEA, with bearing on the

¹⁰⁹ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

¹¹⁰ This system is not as originally designed, but a re-design. The Board previously included both private sector representatives from East Africa and donor members, but some donors had legal difficulties in being on a Board; there was also a fundamental difference between the strategic decision-making of the Board and donor interests.

¹¹¹ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

¹¹² OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

networking and relationship-building staff members undertake with their government partners. DFID were interested in understanding whether staff departures were connected to the 2017 salary reduction recommended by the Council. The evaluation team did not interview many former staff, but where they did, the reduction in salary was not cited as a reason for departure; on the contrary, current staff did mention the deleterious effect of the cuts on morale. Separately, staff longevity and ownership of the TMEA Mission was noted in many interviews, which may show that salary reductions were not in themselves sufficient to push people out. Compared to traditional three-to five-year development programmes, TMEA staff appeared to be more mobile within the organisation, and more specialised in trade. However, with respect to job security, staffers who had survived the delayed approval from S1 to S2 were more wary of thinking in terms of long-term job security with TMEA.

Government partners shared their broadly positive experiences around TMEA's status as a non-profit. Most frequently they reported that the not-for-profit nature of TMEA was necessary for the working relationship, and that it was mostly invisible: 'it made no difference to us functionally,' said one respondent; most others reported no problems with it. The structure was 'essential,' said another, to establish TMEA's reputation as a reliable Aid for Trade organisation, with integrity'. More specifically, one partner said that the Board and NOC structure around the set of donors 'shielded the beneficiaries from conditionalities common with donor-funded projects', while another pointed to TMEA's value in "packaging our message to the donors.' A third mentioned being shielded as well from the procurement process, while another noted that 'non-profits don't pay on time, but TMEA does. That establishes its reputation as a strong partner.' A TMEA donor said, 'The NOC arrangement at country level is inclusive, well-chaired, brilliant. Their job is unlocking bottlenecks.' There were reports from a few partners, however, that the 'bureaucratic internal approvals processes' were slowing down funding, particularly since the Board structure had been imposed.

The DFID Smart Guide outlines five risks that come into play with the use of an SPV. One is reputational risk, which to date has not been subject to damage. The association with Trademark South Africa has perhaps made both DFID and TMEA more aware of the risk, and more proactive in maintaining a strong reputation for neutrality, transparency, and accountability. The TMEA financial and strategic teams are acutely aware that donor attention to this risk is important, and reputational risks are part of their overall risk management strategy.

Another risk identified in the Smart Guide is that donors may not have the appropriate skillsets for Board membership and governance or committee roles. DFID, other donors and TMEA have worked to adapt the Board structure during S1 to clarify roles and improve relationships and communication. This was done by creating a Council on which donors would sit, and a Board consisting primarily of East African private sector leaders; with this structure, donors' strategic and guidance roles were assured, while the Board members retained fiduciary responsibility for TMEA. TMEA have also worked to improve risk oversight (with a clearer paper trail at project, country, and corporate levels). The donors have also outsourced salary studies, due diligence, and independent evaluation, and worked with TMEA to act on the findings. These steps have improved the management function and helped the donor group balance the competing requirements of autonomy and control. At the same time, oversight from DFID has been subject to turnover, and given that TMEA is a large and longer-term project, newcomers to the oversight roles have had a steep learning curve. While there will always be turnover, there may be value in considering how to improve the handover and oversight for such important, visible, and substantial programmes.

A third risk is that DFID or the other donors might miss regulatory relief granted via bilateral treaties, that under another organisation type they would otherwise enjoy. If so, this would be added to a fourth risk mentioned in the Smart Guide, the costs of setting up an SPV, which the Smart Guide warns can be higher than other organisation types. However, the choice here was between a trust and the CLG, not between the CLG and all other types of organisations (because of the requirements of multi-donor and multi-country work, as described above). For this reason, the CLG could be compared with the trust format, in terms of these costs and potential regulatory relief. Ongoing Board costs, including Board remuneration, are an important part of the governance budget; this could be compared with the costs incurred by Trusts like FSD Kenya, to weigh whether the additional flexibility and options for regulatory relief are offset. On the other hand, some countries might not have the appropriate firms to provide Trust services, as mentioned above, and whatever work-around this caused would also have its costs.

A final risk discussed in the Smart Guide is about having the right people on board to design and manage an CLG/SPV, which is more specialised. The procedures and processes for management functions were reviewed closely for OPM's Institutional and Organisational Assessment, as well as by external reviewers in 2010 and 2011, and reviewed again and found to be appropriate in 2016 by Ernst and Young, though country-level staff were said to have somewhat weaker skillsets in these areas; further, large-scale projects were seen to be more

at risk because of key financial reporting requirements.¹¹³ However, these assessments were not specifically related to the requirements of a CLG/SPV, but were more general. At the same time, as noted in the following subsection, TMEA's expansion in S2 will require different organisational formats, which will mean ensuring that staff have flexible skillsets around these, rather than being focused on how to set up and manage a CLG/SPV.

Future directions. TMEA's status as a CLG/SPV seems poised to benefit the organisation's sustainability as well, with a reputation for competence and a catalytic role in the trade space (please see section on coordination, below). The appropriate structure is in place for a continued East African presence that allows adaptation to changing donor priorities or other funding streams. TMEA themselves have been exploring how to improve the structure, by setting up the countries as subsidiaries rather than branches, or by adding a for-profit structure to fund returnable capital projects. At the same time, TMEA is setting up as an international NGO in at least one of the new countries, so the model appears to be adaptable enough to permit a mixed model in expansion.

3.2.1.4 Conclusions

The CLG/SPV model was appropriate for TMEA in S1, and offered characteristics that a trust arrangement would not, including flexibility for more customised and flexible risk management around strategic decision-making. Setting TMEA up as a CLG/SPV played a part in TMEA's success. TMEA's position as an institution independent from other agencies in East Africa, its institutional longevity and that of its expert personnel, and its focus on trade have established the image of a neutral broker. The SPV also allows TMEA to aggregate and maximise donor interests while de-politicising donor relationships with partners. The system of governance involving the Council, the Board, and the NOCs allows for bespoke risk management, provides entrée through well-positioned local leaders, builds in useful donor oversight and critique that is also balanced with East African viewpoints. In this respect the model is also beneficial for ensuring the substantial consideration and incorporation of those viewpoints.

The agility with which TMEA, as an SPV, was able to work on trade interventions and on some direct poverty reduction projects was an important benefit of flexibly identifying and responding to needs, such as the work on export capability. Given that donors wished to work together on TMEA, the SPV proved a strong functional model to work towards for impact on trade and poverty reduction, though perhaps it is more realistic to say the model allows TMEA to achieve where other models might have important limits – such as the short time frames and rigid contracts of a contracting firm, or the political risks for an NGO. A trust might have served TMEA well, but the point above about a possible imbalance between the risk tolerance of the strategic and trustee sides of the equation is well taken. TMEA has worked to monitor and mitigate risks but at the same time calculated risks are possible and even encouraged. Those limitations that TMEA did encounter in reaching impact on trade, and on poverty reduction, did not come from the SPV model they adopted, and there is no evidence to suggest another model would have had better results on either trade or poverty reduction goals.

DEQ5.10 To what extent are the programme's governance arrangements leading to the delivery of high quality and timely outputs?

The response to this question examines TMEA's governance arrangements and their effects on programming. As S1 grew, so did the requirements for strong strategic guidance and, to some extent, greater checks and balances. The evaluation team looked at HQ and country-level leadership – the NOCs – and their advantages and disadvantages for programming. At HQ level, an important aspect of the governance arrangements – the addition of the Council and its relationship with the Board – was added midway through S1. This made for a natural experiment about that change, and the way the governance arrangements would have differentiated effects on programming. Another important feature of governance that affects all levels of the organisation is the multi-donor status of TMEA, with challenges for M&E, oversight, and earmarking. An overarching consideration around the industry interest in 'doing development differently' also affected TMEA. How and with what expertise the resulting governance structures guided and evaluated TMEA's work in S1 was also of interest.

TMEA is constituted with a Board made up of East African private sector leaders, and a Council of donors who sit biannually. Two donors, from the UK and the US, also sit on the Board. With the ultimate responsibility over the spending of their countries' taxpayer dollars, the Council shares governance with the Board, which meets quarterly and reviews each PAR with strategic consideration of the benefit to East African systems and citizens; the Board members also have fiduciary responsibility and could be sued. The donors have home constituencies and challenges to consider. Donors do not have as much responsibility for operational decision-making, but can step in with their concerns, which carry decision-making weight. One HQ leader described this as a 'hybrid'

¹¹³ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

system. Some interviewees reported that the arrangement had its share of challenges during S1 in terms of communications and disagreements about important strategic and operational issues; some of which are discussed in the OPM Institutional and Organisational Assessment report.¹¹⁴

One staffer said the hybrid system had brought about greater rigour and coherence in governance at HQ level now and was necessary as TMEA grew. Donor compliance requirements like these approval processes are necessary, including when working with government partners. A private sector respondent noted that complexity in approvals had increased for this reason, 'to secure the investments made with taxpayers' money.' Timelines for the quarterly Board approvals process did provide a constraint for some: 'You have to hit the requisite windows, with a lot of run-up requirements', said one partner familiar with the process, who called a virtual working model 'a good working substitute.' Several others also noted greater delays and requirements for approvals – among both partners and TMEA staff.

Country programme respondents associated the evaluation interview questions on programme governance with their NOCs. Partners and TMEA staffers at country level were nearly unanimous in praising the NOC structure, because it enhanced country ownership and helped them with delivery: 'it's important because there, we discuss, and solve problems.' The Board and the NOCs have joint interactions twice per year as well. Others noted that the NOC members' placement in key agencies and in the private sector supported that problem-solving mandate, which they felt was a necessary and helpful resource. NOC members felt ownership of the programme, and they used their own political capital, demonstrating their investment in project and country programme success. They also took their oversight roles seriously for fine-tuning and paving the way for the projects.

A private sector foundation respondent reported that it was like having multiple donors, 'but you get them all in one room, and they all get feedback, and agree on common targets,' at once. A TMEA staffer suggested having corporate services at the country level as well, to avoid the perception of the programme being 'Kenya-centric.'

According to private sector partners, TMEA also '[kept] us from having to deal with each of the donors directly', said one, 'who are not as technically hands-on as TMEA' said another. TMEA also took partners' requests through the governance and donor approval processes, which for numerous government respondents was a relief. One government partner called the due diligence process 'a rough exercise.'

Delays ranging from a few weeks to a few months have been the greatest cost of the new structure, with both Board and Council, but it is a workable solution that provides both East African and donor inputs, while keeping fiduciary responsibility in the hands of the Board. The Board and the NOCs are networked within the requisite industries and agencies, bringing their sectoral knowledge to the PAR process to ensure planning aligns with the on-the-ground working conditions, and to ongoing operations to link TMEA progress to the resources necessary for successful projects. The governance structure is appropriate given the constraints and requirements that must be met.

DFID, with the most funding for TMEA in S1, has had a leadership role in the oversight of TMEA. With the breadth of thematic interventions and the scale of investments, this has not been a simple task, but one that has been challenged by staff rotations in and out of related posts. Ideas about 'doing development differently'¹¹⁵ at DFID have been important in the management of TMEA: like other donors, DFID has taken on board longstanding recommendations to programme more adaptively in reaction to the more systematic and complex institutional issues development actors now focus on, with more locally legitimate structures and multiple stakeholders to resolve locally identified problems; and work through portfolios that involve experimentation and innovation and can be quickly scaled up or down relative to their success. One consequence is that funders, like DFID, often have a more arm's-length relationship with programming, with longer time horizons and wider thematic goals placed more squarely in the hands of national actors, and – it is hoped – a greater tolerance for uncertainty and for small-scale failures to find out what works and what does not.¹¹⁶ TMEA was cited in a study on these types of programmes: 'TMEA is widely acknowledged as a major success story of 'arm's length' aid, having significantly contributed to development prospects in one African region by addressing specific barriers in close partnership with regional and national actors.'¹¹⁷

¹¹⁴ OPM. Workstream 2 – Deliverable 2B: Institutional and Organisational Assessment. (forthcoming)

¹¹⁵ ODI. Undated. The Doing Development Differently Manifesto. <https://www.odi.org/sites/odi.org.uk/files/odi-assets/events-documents/5149.pdf>

¹¹⁶ Wild, Leni, David Booth and Craig Valters, ODI. 2017. Putting theory into practice: How DFID is doing development differently. February 2017. <https://www.odi.org/publications/10729-putting-theory-practice-how-dfid-doing-development-differently>

¹¹⁷ Booth, D. 2013. Facilitating Development: An Arm's-Length Approach to Aid. Discussion Note. London: Overseas Development Institute. <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/8791.pdf>, cited in Wild, Leni, David Booth and Craig Valters, ODI. 2017. Putting theory into practice: How DFID is doing development differently. February 2017. <https://www.odi.org/publications/10729-putting-theory-practice-how-dfid-doing-development-differently>

However, that arm's-length distance has also meant DFID and the other donors did not exercise detailed, day-to-day technical guidance over TMEA. In a more typical development programme, donor influence over issues of ToCs, technical economic analyses underpinning programme decisions, indicators and data would have involved review at a close level of detail, and would have caught errors of the type seen in TMEA's RF as early as 2014-2015.¹¹⁸ TMEA respondents reported, paradoxically, that donors insisted on particular indicators that were complex and problematic in S1 and 'micro-managed' some interventions. One respondent said donors were adding more 'donor stipulations' as time went on, including earmarking, that limited the flexibility that was so effective in programming. However, in the area of results during S1, DFID did not fully monitor data quality. This may be because the breadth of interventions requires a wide range of technical skill sets to know what kinds of indicators work for all these types of interventions. Rotation in and out of Kenya, and out of DFID HQ roles, also contributed to the problem.

At the same time, the number of oversight exercises contracted – including some commissioned by the TMEA Evaluation Committee – was burdensome and overlapping, producing long reports and lists of recommendations. While component teams did work to incorporate recommendations, several donors admitted they could not keep up with the quantity of reports. Donor participants in the Council and NOCs noted that participation required 'a lot of paper, and a lot of time to follow and participate actively.' Another said, 'We do not have time to read even the evaluation reports for that one committee – as good as they might be. We need timely and concise updates, not these reams of paper.' Managing TMEA was therefore a substantial responsibility but for which key tasks around results were not well attended. It is difficult to reconcile the two issues: oversight that is perceived as excessive in terms of evaluative exercises (annual reviews, audits, M&E reports by donor country, due diligence reviews, internal and independent evaluations) and increasing earmarking and other stipulations, with an arm's-length relationship with the project that missed some results-related fundamentals. In addition to different management styles from changing personnel, what seems evident is that DFID's adoption of 'doing development differently' tenets has left advisers with room for interpretation.

3.2.1.5 Conclusions

Governance structures fit the needs of donors for the most part, and act to consolidate donors' development priorities, funnel oversight of partners, and ensure dedicated local strategic and operational input through the Board and NOCs, respectively. Concerns with increasing layers of approvals were increasing, and a virtual solution appeared to help somewhat. The greatest drawback for TMEA and partners was in the delays these additional layers added to approval processes. The more arm's-length relationship with donors, broad sweep of geographic and thematic interventions, increased burden of evaluative exercises, and less influence over the broad technical challenges in the RF are related and will have to be addressed in future programming.

DEQ5.11 Is the operational model at donor level appropriate and efficient for delivering TMEA? What are the key enablers which need to be preserved, and what are the remaining constraints arising from donors' systems?

This DEQ is answered by looking at the multi-donor operational model and the benefits and drawbacks of the coordination this entails. This answer, and that for DEQ5.10 above, are closely related, as the donors' model includes the governance of TMEA. The issue of oversight discussed in the previous section could well be repeated here (but for space concerns is not). The evaluation team looked at the model of this much larger, more long-term, and more arm's length actor within the region's trade space.

As described just above in the evaluation question on governance, TMEA's donors sit on the Council, which provides 'high-level strategic support to the Board and TMEA Members.... [including] the overall framework for what TMEA is intended to achieve, and the parameters within which TMEA must operate' according to the TMEA Constitution.¹¹⁹ The multi-donor arrangement that supports TMEA is unique and valued by the partners, because having multiple donors has meant that partners and other interested parties do not associate TMEA with the political agenda of just one donor. For donors, it aggregates interest in trade and offers reduced transaction costs compared to bilateral programming, and the potential for greater impacts. TMEA's position between partners and the multi-donor council acts as a filter and 'buffer' in both directions: donors have only to deal with one implementer who is responsible for outputs and outcomes, and partners have only one donor interlocutor,

¹¹⁸ Problems included lack of baselines, targets, and/or data; data in different formats or units; incompletely defined indicators; indicators without data sources; data rolled up from country level to corporate level incorrectly; lack of disaggregation by sex; lack of differentiation between indicators for given components between output and outcome levels; and other challenges. The 2017 AR identifies these in an annex; the PE adds other challenges we identified. This is discussed in detail in the response to DEQ5.1.

¹¹⁹ TMEA. 2015. TMEA Constitution. Approved by the PIC on June 12, 2015.

who is seen as more neutral. TMEA, then, had to deal with the administrative burden of multiple and distinct reporting requirements in-house.

Donor representatives also appreciated the operational model: there is often a 'Lone Ranger' approach, said one, with bilateral programming. The multi-donor arrangement makes that less possible. One of the problems with that approach, among others, is that donors are isolated and uncoordinated (see the response to DEQ5.13, below, for more on donor coordination), with possibly less connection to the context. For example, another TMEA donor respondent remarked that a JICA team arrived to work on OSBPs, without knowing that TMEA had been working on OSBPs for years. This respondent noted that this bilateralism and lack of coordination were part of the calculus at the beginning of TMEA: 'The idea was to set it up big enough, resourced enough, to be a "centre of gravity" for regional integration.' The strategy appears to have worked: no donors, and few others among the respondents (apart from external private sector firms) were unaware of TMEA and its work. In and of themselves, this visibility and level of resources are not a prerequisite for delivery, but they give weight that supports the 'convening power' discussed in response to DEQ5.6 above on the strengths and weaknesses of the programme's working model.

The positive impressions were confirmed concretely by standards agency respondents in one country, who said that the multi-donor structure functions like good donor coordination should. Working with TMEA for some EAC partners was more efficient and demand-driven than working with other donors: '[Unnamed donor] imposes their agenda on us, while TMEA programmes are run and owned by the locals.' A TMEA staffer said that donors' previous negative experiences with the EAC had soured them on supporting the institution, but that the TMEA experience had 'opened it up in a very positive way', encouraging four new donor relationships, because the EAC was seen as more reliable. A TMEA donor echoed this impression: 'We gave a \$1m grant to EAC and they weren't able to spend it. TMEA [... then] committed staff to EAC activities, [...] and had a very significant impact on EAC work.'

One donor discussed the particular nature of TMEA: 'is it an organisation, or a programme?' The respondent said their home government felt TMEA was trustworthy for delivery and was 'more agile than the IFIs', and that the structure now in place fit well with the demand for trade-related support. In this representative's opinion, the donor appetite to continue made a strong case for sustaining TMEA for some time to come.

Two donors mentioned a controversial element of the donor operating model: earmarking, which can serve a positive purpose of funding activities that might not otherwise be funded, or of focusing the funds from a given country. However, as one core funding donor reported, 'Earmarking is deleterious. At the beginning [of the programme] we said you could only earmark a country, not thematically, but that has fallen away.' This affects how beneficiary outputs are counted, in that one funder focusing their funds on a given component counts all beneficiaries their funds supported; another funder whose funds also contribute to that component may also be counting those beneficiaries. Accounting for earmarked funds can also be a challenge: 'I don't know how TMEA deals with it', said one respondent, while another said, 'Following the money that's earmarked is impossible. When politicians visit, and we are asked to confirm our outlays... it's hard because accounting at that level of earmarking is difficult.' The DFID Annual Reviews include a third concern with earmarking, in that it can 'create distortions if it is not aligned with the TMEA ToC,' affecting funding fragile states and landlocked states in particular, by steering resources more generously towards the coastal countries.¹²⁰ This has the effect of prejudicing funding across the region, which minimises the benefits of multi-donor, regional efforts towards common goals. TMEA sources cited a need for regional 'untied' funding for country envelopes as a key issue for flexibility in programming.

3.2.1.6 Conclusions

The model was broadly both appropriate and efficient for delivering TMEA. The model worked appropriately for the multiple donors, and for the TMEA partners, who shared a set of goals around trade and integration. Bringing so many donors together who could not have funded a programme of the size, duration, or complexity of TMEA individually was an efficient way to streamline what would have been disparate efforts that themselves would have required coordination. The longer duration of TMEA compared to other development programmes (often 3-5 years) lowers the transaction costs of start-up and shut-down, while housing all donor funding in one programme lowers transaction costs of hiring and administering several distinct programmes. Managing the programme more at arm's-length enabled a greater sense of programme-partner control over decision making and greater partner ownership.

¹²⁰ DFID: BKP Economic Advisors. Annual Review of the Trademark East Africa Programme, 30 November 2017, pp. 19-20.

There are challenges in the model as well. Donors' distinct interests compromised this efficiency somewhat by earmarking programming. Having multiple evaluative exercises and M&E requirements from different donors is also less efficient, overall. M&E requirements for such a broad and long-term programme are extensive even without these challenges, and the donor consortium faltered to some extent in holding TMEA to account on indicator and data quality, and on a detailed, iterative and documented theory of change process. As discussed in the response to DEQ5.10 above, the more arm's-length relationship of donors with TMEA fostered this different environment.

DEQ5.12 Did TMEA align with country systems and agencies in an effective manner for ownership, and for impact? How could this be strengthened?

The response to this DEQ echoes one of the report's earlier sections, on the strengths of the TMEA model (DEQ5.6). The evaluation team queried partners on the processes that drove programming design at the outset of S1, and adaptation through the life of the programme. The close relationship between ownership and sustainability is further explored in the response to DEQ5.17 and 5.20, below.

TMEA operates in large measure on a demand-driven model, in line with Paris Declaration (2005) principles and those of the 2030 Agenda for Sustainable Development (2015) calling for greater country ownership and the use of catalytic donor investments to support national priorities for reform. It is also in line with 'Doing Development Differently' principles around local solutions to locally-defined problems, and TMEA themselves report there is a virtuous cycle at work, in which being 'stakeholder-driven' has supported TMEA's convening power and political intelligence. This was reaffirmed in dozens of evaluation interviews with government partners, who spoke of TMEA as 'different to other donors', committed to agencies' 'substantive engagement and leadership' in decision-making and implementation. The NOC structures were particularly indicative, with strong local leadership from government and the private sector, holding programming actors to account for progress and using their networks to problem-solve. NOCs in Rwanda, Tanzania and Uganda were singled out by respondents as particularly pro-active; EAC Secretariat respondents who worked with the Programme Coordinating Committee (PCC) also cited the 'dialogue' that set the shared agenda, in which 'the Secretariat took the lead 150%', and for which the PCC served to mitigate problems and issues identified by the Common Market Scorecard and the Common Market Protocol biannual reports.

As discussed in response to the question on EAC trade and integration priorities, significant evidence shows that TMEA operated largely as a demand-led model at national level as well. For a major ICT for Trade project, a revenue authority assigned dozens of staffers to work on the project, which is integrating tax collection tasks across the whole of government and ensuring safe data storage; the scope of change and government resources dedicated to the effort indicates alignment with the national system. Another government agency partner described port community meetings as an expression of government priorities, such that TMEA's involvement allowed them to understand and be part of those priorities, and that 'TMEA got messages across in a way that helped KPA.' One agency in Rwanda said their goal was TMEA's goal; another partner praised TMEA's good partnership with government that facilitated the working environment across partners. Agency respondents in two countries compared working with TMEA, with working with another donor: 'programme implementation is difficult with [the other donor] while TMEA is very efficient and [the other donor] imposes their agenda on us, while TMEA programmes are run and owned by the locals.' Only one agency respondent, a permit issuing agency in another country, reported feeling that communications could be stronger with TMEA, noting there was 'uncertainty in how often their project implementation team (PIT) would meet.'

TMEA staff reported having extensive meetings for given projects, and even more so with projects that required inter-agency responses in a country: 'TMEA had a joint design process with Uganda, including joint on-site inspections and joint meetings during which each country borrowed ideas from the other. TMEA made a point of knowing its stakeholders through monthly meetings throughout, with representatives from all relevant government agencies and the private sector, plus bimonthly onsite inspections; and regional quarterly meetings not just for one OSBP but all OSBPs.' In the case of ICT for Trade investments, TMEA staff reported that it was as necessary to ensure change management as it was to get right the technical specifications, as noted above. Rather than seeking the most advanced systems available, the team worked to a standard of 'best fit' for the agency or agencies, making maintenance and upgrades ultimately more accessible.

In each of the four countries visited for the PE, this demand-driven model was evident in agencies interviewed. Where relationships with government were more problematic, TMEA's demand-driven model was not specifically at issue: one such case was with TPA, in which a change in government had brought new priorities. In essence, donor and TMEA reform goals were more ambitious than those of TPA's leadership and of the new president. In the interviews with agencies where the model was explicitly praised – a majority of agencies interviewed in each country – relationships had been built over time and with considerable funding put towards agency priorities.

Strong examples include:

- Across countries: Revenue authorities; Ministries of EAC affairs and to a lesser extent Ministries of Trade; Northern Corridor Transport Observatory
- Kenya: Highway and port authorities
- Rwanda: Development Board, Agricultural ministry offices, and standards bureau
- Uganda: Ministry of Trade and standards bureau
- Tanzania: Ministry of Agriculture and Food and Drug Administration

TMEA aligned well with these agencies' priorities, and together TMEA and their partners advanced those priorities. When TMEA's priorities differed – as in the case of reform at Dar Port – goals were harder, sometimes much harder, to reach. In the case of TPA, TMEA retooled their priorities, even making the case for a non-landlord port, but continues to have significant difficulty in working with TPA.

Successes among individual agency efforts as described here are also the result of interpersonal interactions and political will; whenever TMEA found a new director in place at a given agency, they had to begin again the process of building the relationships to continue these efforts, such as after elections, or cabinet reshufflings that cascaded change through the ranks. When there was clear benefit to an agency – as in the case of revenue agencies that were benefiting from systems and potentially from increased revenue – the degree of engagement from the partner side was more reliably strong. Where efforts were pursued that posed a risk to status quo – such as reform agendas – those relationships and the degree to which TMEA could fully align with national goals were more precarious.

External and TMEA donors reported satisfaction with TMEA's demand-driven focus, noting 'strong partner state buy-in.' Another noted, 'TMEA is more on improving service provision with various government departments.' A TMEA donor at country level reported: 'TMEA have regular interaction with government, including through the NOCs. Their plans are shared, and both formal and informal proposals are made through good healthy dialogue. The government here see TMEA as very valuable: TMEA has money which gives both leverage and goodwill.'

Private sector partners also felt TMEA's relationship with government was different to that of other donors, and important for their own projects. According to a private sector apex body, TMEA collaborated actively with government agencies which enabled TMEA to influence decisions. Another private sector partner said TMEA amplified the partner's role because TMEA identified areas for the partners' advocacy efforts from among government priorities. Yet another private sector partner noted TMEA's efforts to align the partner's project flexibly to the legislative cycle at country level. Another private sector apex body reported that it had been vital that TMEA aligned with national priorities for a project on improving the business environment: 'Fortunately government was looking at ideas to improve the economy and to attract investment, and were therefore receptive.'

There were, of course, times when TMEA rejected certain partner proposals based on the programme mandate or budget rules; government partners explained such cases with an understanding of why they were the programme did not take them up. Partners in export capability and other SO3 projects were more likely to report that the agenda was more directed by TMEA. Donor concerns about these projects and some capacity deficits likely played a role in the more top-down design constraints in some of these projects.

3.2.1.7 Conclusions

Partners praised TMEA's operational model for being demand- or stakeholder-driven, as discussed here and in the response to DEQ5.6 on TMEA's strengths and weaknesses. Being demand-driven is a key aspect of 'Doing Development Differently' that was aided by TMEA's close, consistent, and flexible working relationships with its partners. In addition to the TMEA-supported project steering committees, the NOCs served to strengthen this local problem-solving model. Agencies whose TMEA-supported priorities produced immediate, tangible benefits took best advantage of the goals they shared with TMEA to generate results, like new systems for revenue authorities. Where TMEA's goals were somewhat more ambitious than those of the agencies – as in reform projects – building relationships that allowed that demand-driven model to flourish was more work.

For private sector apex bodies and association partners in SO3, TMEA also aligned closely with organisations' existing priorities and garnered greater ownership. Across the bulk of projects in SO1 and SO2, and some SO3 projects, this model inspired ownership. With export capability and CSO partners, as detailed in Annex J, TMEA had more limited scope and worked with organisations with less capacity, which led to more top-down design constraints. This is the only area where TMEA might consider if improvements in alignment might be possible.

Whether TMEA's alignment through this demand-driven model supported impact at the level of increased trade is less clear, since the PE did not identify TMEA results at the level of impact. However, prominent country ownership and decision-making are more promising for eventual impact, particularly with efforts for institutional reform, where durable change will require ongoing commitment from partners with or without TMEA funding.

DEQ5.13 Are the focus and activities of TMEA consistent with, and additional to, those of others' development programmes in the region? To what extent has the programme facilitated improved coordination?

The response to this DEQ examines the wider donor environment in aid for trade in the region, and TMEA's place within that landscape. As a multi-donor programme, TMEA's size and scope were larger than traditional bilateral programming and included the challenging yet opportune interest in regional integration. Yet the size and scope were fractional compared to major infrastructure lenders such as the World Bank and other development banks. TMEA's role in this middle space, and its notion of 'catalytic' investments is explored, along with its importance in the RI goals of S1.

As suggested above in the response to DEQ5.11, the structure of TMEA had the effect of coordinating most efforts among its own donors, evidenced by the Council and the NOCs; and, externally, in creating a 'centre of gravity' with resource and visibility levels higher than those of traditional development partner programmes. The evidence collected indicates strongly that government and other partners see TMEA as different: less tied to a given donor agenda, more able to convene stakeholders, offering technical services, and working in a demand-driven fashion – and that this set of attributes comes from one organisation, comprised of many donors, is already a coordination accomplishment. DEQ5.13 asks as well how the set of TMEA efforts aligns with those of other development programmes in the region, and whether the advent of TMEA in S1 resulted in greater coordination among this wider body of actors.

The most common view among government and private sector partners, TMEA staff, and donors is that the focus and activities of TMEA are consistent with and additional to those of other development programming, with coordination sufficient to avoid duplication of efforts and ensure that key gaps are filled. A former donor staffer noted that DFID had co-chaired a trade and private sector donor group for several years, in partnership World Bank or Danida, saying it was a 'useful forum' for organising donor efforts. A quarterly transport sector working group was also mentioned, along with an infrastructure coordination group, which link up with an annual Development Partners' Group meeting with the government of Kenya. A port community donor group was said to have 'fizzled.' As a result of this structure, the donor respondent added, 'DFID, JICA and AfDB have always been in communication, and all have participated openly', which was confirmed in JICA and AfDB interviews. Other interviews confirmed TMEA's regular collaboration with these key development partners working on trade. Only one donor respondent pointed out a difference of opinion with TMEA, saying they preferred an 'arm's-length' relationship with partners, while TMEA was more inclined to 'hand-holding' agencies through projects.

Some examples of TMEA's complementary and additional work included the following: A JICA country office developed a Transport and Logistics Strategy for the government, while also constructing a second container terminal at Mombasa Port; TMEA complemented the second container terminal in that its work to pave Yard 5 for better container capacity served to ease capacity constraints well before JICA's terminal was ready, an example of additionality that served Port interests before the new facility came online as well as since that time, with overflow capacity. The African Development Bank (AfDB) and World Bank (WB) also had Mombasa Port and roads projects (as did the Kenyan government) that worked in concert with TMEA's efforts to strengthen roads in the Northern Corridor, in another example of additionality, such that the TMEA road efforts around the Port (and, not incidentally, the airport as well) contributed to a wider plan. Later efforts from the Kenyan government built upon the gains as well, providing their own additionality to the improved road network supported by donors.

A Mombasa Port needs assessment near the beginning of S1 identified berth upgrades as a key investment to improve efficiency and environmental impact. While TMEA was not able to undertake that work financially, they undertook a detailed feasibility study in line with international standards, as a 'catalytic' investment recognising that previous infrastructure feasibility work had sometimes been sub-standard. Governments have been reluctant to cover the necessary costs of such detailed studies; other donor projects are often too small to finance such studies, which run in USD millions; while World Bank and other major infrastructure donors tend to only invoke their demanding loan approvals processes for the much larger amounts needed to put a well-thought-out design in place. In that way, TMEA provided additionality to the donor mix in the area, and when this study was complete, TMEA organised a conference to assess donor interests in funding the upgrades, in the form of a loan. The effort to identify funding was successful, but to date the loan has not been accepted by the

GoK nor has any work begun. TMEA efforts in Dar Port were conducted jointly with the World Bank, and One-Stop Inspection Stations were carried out in the same country alongside the EU.

The OSBP work, with the breadth of programming required to realise the goals, brought donors together. TMEA took over the OSBPs projects from the World Bank, according to evaluation interviews in 2016 and in 2018. A World Bank transport adviser recalled, 'TMEA expressed that they were ready to develop OSBPs across East Africa, as part of their support to trade and infrastructure development in the region. It was agreed by the WB that TMEA would [complete the partial OSBPs] so the World Bank could focus on larger, more expensive infrastructure work.' The WB had determined the OSBP projects were not optimal areas for their own lending, and JICA funding would not cover the range of OSBPs on key transport corridors in the region. Again, TMEA's unique size – well larger than most development programmes, and fractional compared to what the WB or other lenders invest in infrastructure projects – allowed them to fill an additional niche that might have gone underfunded or unfunded otherwise. A JICA project office worked on OSBPs at other sites, on an updated OSBP Sourcebook¹²¹ that could be used by donors and governments, and on OSBP manuals – this last, with the cooperation of the German Society for International Cooperation, known by its initials GiZ. COMESA provided funds for capacity building at OSBPs.

Multiple other partners cited coordinated work across donors, involving TMEA. A parastatal body in Kenya said (non-TMEA) donors knew about the agency's work with TMEA, which avoided conflict and duplication of efforts in creating ICT for Trade solutions. TMEA logistics component work paired with the Kreditanstalt für Wiederaufbau (KfW, Germany's Credit Institute for Reconstruction) to train truck drivers, with plans in S2 to utilise the revamped driver training curriculum that TMEA had created (additionality). Standards and ICT for Trade facilitation work benefited from coordinated donor efforts, including TMEA, where TMEA could build on prior UNCTAD provision of ASYCUDA World in Uganda, for example, or the earlier work with the standards bureau in Rwanda. In these cases, TMEA's work was additional or complementary to that of other donors, in alliance with government interests.

Private sector examples of alignment across donors included parallel support for a business environment delivery unit from an International Financial Institution (IFI), to complement TMEA support to business environment enhancement activities, including by offering a regional path to formality for small informal businesses. A respondent from another IFI noted TMEA's support to corridor observatories, complementing the IFI's efforts to improve tools and capacity for data collection using data collected automatically from Customs agencies along the Northern Corridor. They also cited agreement with TMEA on next steps to standardise procedures between the SGR and the ICD during TMEA's S2. In another country, UNWOMEN established a platform for women in cross-border trade to voice their issues, which TMEA built on in their subsequent project, providing additionality in this way. There were fewer opportunities for additionality among SO3 projects, in that the field of operation is broader but more diffuse, and there is plenty of space for donors to work with associations, co-operatives, and other grassroots-level bodies that are not working with anyone else.

One area that is ripe for greater coordination in S2 is that of improving data collection, sharing and analyses among donors. The corridor observatories have made important strides in improving data quality among those indicators they collect, and TMEA plans to work on real-time data collection at their OSBPs, to fill data gaps, in S2. But there are other research efforts around trade and transport data through the World Bank and USAID that could be usefully coordinated around common goals and international best practices in trade, transport, and government agency data. Given capacity gaps among partners in M&E, this might also be an area for complementary support to governments working to capture similar changes in several countries at once.

Few respondents mentioned that coordination had changed, per se; however, the advent of TMEA and the way it brings together multiple donors alone reflect greater coordination of the sector, compared to pre-2010. A recent World Bank evaluation on RI efforts including the EAC noted that the Bank did not achieve its own potential for coordination; the evaluation also cites TMEA as an influential player in the EAC with as much or more convening power than the Bank itself on aid for trade issues.¹²² One TMEA staffer noted that donors want a lead agency to coordinate partners, recognising a need for greater coordination than before; this respondent said the EAC itself wanted that coordination role. In another example of improved coordination, EAC partners reported that development partners had collaboratively agreed how to work with the Secretariat – though, again, TMEA was a participant rather than a leader or coordinator in these improved relations.

¹²¹ NEPAD 2016. One-Stop Border Post Sourcebook, 2nd edition. In the appendices of this document (pp. B1-B3) tables are presented which show the donor contributions of all African OSBPs (as of January 2016), including all TMEA OSBPs.

¹²² World Bank Independent Evaluation Group. 2019. Two to Tango: An Evaluation of World Bank Group Support to Fostering Regional Integration. World Bank Independent Evaluation Group, April 15, 2019. Available at: <http://ieg.worldbankgroup.org/sites/default/files/Data/Evaluation/files/RegionalIntegration.pdf>

3.2.1.8 Conclusions

TMEA itself is an example of extensive donor coordination, bringing together several bilateral donors into one programme with a shared scope and a less overtly political partner for governments and others in the trade space. Consolidating donor interests in this way, and being bigger than traditional donor projects, gave TMEA a level of influence in the sector and, with the traction gained from their extensive projects with governments, TMEA was a major player that worked with and around the other development partners. This coordination came as much from component-level and country programme teams as it did from HQ; TMEA teams working with government partners developed plans to fill gaps that other donors did not, and no evidence of duplication of efforts came to light. The coordinated work at project level with other donors ensured that TMEA's efforts were additional to their inputs by filling in key gaps. Though TMEA did not take on a sector-wide coordination role in a formal way, the programme undoubtedly facilitated improved coordination across the sector by bringing many donors' efforts together under the TMEA programme.

DEQ5.14 What sorts of approaches have been more successful in working with regional institutions in Africa?

The response to this question examines how TMEA worked with regional institutions in Africa, most prominently with the EAC Secretariat. This included exploring the political and technical approaches at work between the TEPP and the EAC Secretariat around the SCT and looking for evidence of other regional bodies with whom TMEA worked during S1. Donors seemed particularly interested in this question, perhaps with an eye towards future programming on RI in the region and elsewhere.

Evaluation evidence suggests that TMEA worked in a responsive, consultative, demand-driven way with partners that motivated country ownership; each of these characteristics was mentioned by staff and partners as contributing to success in their engagements in working with regional institutions. Consultation and being demand-driven helped gain buy-in at design stage and encouraged ownership, giving regional institutions incentives for committed engagement. EAC and other respondents mentioned the value of TMEA having its office in Arusha, where programming was coordinated and technical support was at hand – including with embedded staff in several departments, which was specifically cited as a good practice. A donor added that the Project Coordination Committee (PCC) helped organise the engagement and monitor progress, while building TMEA's credibility with the Secretariat.

The liaison function of the TMEA Arusha office was cited by several TMEA staff as a useful approach, because of the positive relationships that had been built with the Secretariat: 'you have to build your relationships.... Context is still important, and [actions] are politically driven', said a TMEA staffer. One TMEA donor representative echoed the sentiment, 'politics will always have precedence over technical proposals.... Some issues have faltered over that.'. Another TMEA donor said: 'It's political and there are challenges within EAC, but also the fact that [countries] put a lot of effort into it, at the highest level, is seen as important.... Momentum is still there.' A third TMEA donor lamented the lack of a wider cadre of regional institutions, including other Regional Economic Communities (RECs): 'I would have expected [TMEA] to have a strong relationship with UN Economic Commission for Africa, other RECs (COMESA, SADC), AfDB, specialised Trade Policy Training Centre in Africa, leading Think Tanks. They were not well coordinated with Arusha or Regional programmes either', the respondent added, contradicting several other comments. A fourth TMEA donor said it was wise not to direct funds to RECs, as TMEA had not provided funds directly to the EAC Secretariat, as their audit systems tended not to be strong: 'it's too much of a risk.'

Within given components, partners were pleased with the work with the EAC and regional apex bodies. The concept of the SCT was helpful as part of the approach because it unified different interventions around shared incentives, 'looking at the work from multiple dimensions', according to one regional civil servant. The RECTS served the same function: because the various actors all sought safer cargo, they were willing to work together to resolve issues along the way. A national standards authority mentioned the value of working to harmonise through the EAC Secretariat, because of its legitimacy and influence over national governments, and because of the eventual benefits to be gleaned from shared standards in the SCT. A TMEA staffer complemented this: 'TMEA insists on technical competence and financing, then assists with sourcing funds.' Two respondents noted that establishing OSBPs through bilateral agreements made community across the nations in the region more concrete. 'Joint monitoring' was said to be particularly important, for accountability and ownership; EAC teams reported having taken up monitoring OSBP performance through developing instruments and a protocol with assistance from TMEA. Often mentioned were strong communications between partner states and regional authorities on issues at play, always with an eye towards 'possible points of collaboration.'

From the perspective of the private sector, the approach was to work with regional bodies – such as the East African Business Council (EABC) or other apex bodies. The work with the EABC spanned two projects and four years' time, and aligned closely with the EABC's own goals, according to the interviewees. This meant that the work was seen to be seamlessly part of the EABC's own mandate, in that TMEA's RI goals were closely in step with those of the partner. Working with the EABC is a particularly strong approach because of the fact that the EABC has observer status in the EAC, allowing it entry into all levels of meetings. The EABC also represents corporations and companies across the region, particularly the larger ones, and has a Board comprised of members from all partner states. These features of the approach make the EABC a natural partner for TMEA.

On an operational level, TMEA's focus areas for the work with EABC – tax, standards, logistics and customs reform – get buy-in from EABC's membership because of their important impacts on the private sector. This is a success factor in TMEA's work with the private sector at this level, by increasing TMEA's relevance to the private sector. This also occurred in supporting national logistics platforms, whose newly unified fronts in each country allowed them to work with their regional peers through 'speaking with one voice.' TMEA also ensured the inclusion of the private sector with national partners that had a mandate to work with the EAC, such as standards agencies and the National Monitoring Committees for the elimination of NTBs. These approaches were useful for all concerned: private sector participants (often apex bodies or associations) could have their voices heard, but also the EAC and national bodies working on trade facilitation had more legitimacy because their audiences – private sector businesses and associations – were part of decision-making. Private sector associations and TMEA staff recognised the need, however, for more effort to include SMEs alongside bigger firms in these fora.

3.2.1.9 Conclusions

The evaluation found that TMEA worked in a responsive, consultative, demand-driven way that contributing to success in their engagements with regional institutions. A demand-driven approach helped gain buy-in at design stage and encouraged ownership, giving the EAC Secretariat and EABC incentives for committed engagement. Both political and technical approaches were necessary for that engagement with the Secretariat.

There was value of TMEA having its office in Arusha, where programming was coordinated, and technical support was at hand. Embedding staff in several departments was specifically cited as a good practice. The Project Coordination Committee (PCC) helped organise the engagement and monitor progress, while building TMEA's credibility with the Secretariat. Often mentioned were strong communications between partner states and regional authorities on issues at play, always with an eye towards 'possible points of collaboration', and consistent, frequent, substantive communication between partners and projects.

3.3 Sustainability

DEQ5.17 What benefits (both social and financial) of the programme are likely to be sustainable and would continue with or without TMEA (staffing and funding)?

The response to this question examines the effects of TMEA programming from the vantage point of nearly two years after S1 ended, though many partners are still involved with TMEA, in S2 programming. Given the types of projects conducted in S1, capacity building was a key area of inquiry for the evaluation, and an important goal for TMEA and its partners. Also critical for sustainability were government commitments to the necessary expenditures to operate, maintain and service the S1 outputs, such as ICT systems, monitoring and data, training for staff, and upkeep of infrastructure. SO3 sustainability was more variable, but capacity building both for fundraising and for value addition in exports were key areas to explore for this question. The evaluators also looked at the techniques and approaches TMEA used to support sustainability, and their effects. The evaluators worked to take best advantage of the ex-post timing of the evaluation in looking at the degree to which S1 efforts have actually been sustained – understanding that though this is an evaluation of S1, sustainability of such investments is a focus of the evaluation. On the other hand, some partners continue with TMEA in S2, such that even though S1 has ended, sustainability has not been tested since TMEA continues to fund these partners (both private and public). Table 7 sets out the main sustainability challenges, risks, and good practices, by SO.

As in many development programmes, capacity building was sustainable when it was embedded in institutions, rather than limited to training specific individuals. The scope of TMEA's S1 programming makes this more challenging, since the number of agency employees needed to knowledgeable staff border posts, standards labs, port facilities, national NTB monitoring committees, SMS response mechanisms, permit-issuing offices and the like, as well as ministry policy and implementation teams, across six countries and the EAC Secretariat, is vast. Respondents from national revenue authorities indicated they would cover costs of continuing capacity building and EAC respondents affirmed the national authorities had taken full control, using materials produced

by the EAC (with donor support) in the case of training for Customs staff at OSBPs. The latter respondents indicated an emphasis on training of trainers to facilitate agencies taking over the training role effectively. However, agency and TMEA respondents continue to indicate that longer-term capacity building must be embedded in institutions. Many TMEA projects with these partners are themselves longer-term, which presents both an opportunity and a risk. The opportunity is that TMEA has more time to work with given institutions, identify gaps, and work to address them. The risk is that their longer-term presence can become expected, with governments planning around that presence and support as if it will be permanent.

Those projects that resulted in legislation or policy changes, or included in budgeting or planning, were reported to be reliably sustainable. For example, the Common External Tariff (CET) would be sustained because it was established policy; the Standards, Quality, Assessments, Metrology and Testing (SQMT) Act would do the same for standards; and the OSBPs are backed by the OSBP Act. A revenue authority reported that the new customs management system was captured in their agency's corporate plan for the next two years for a start. Another type of programming that was more reliably sustainable was the ICT4T interventions that minimised time and costs to get trade permits, which have high levels of support from the private sector and would be difficult to reverse. RECTS, from that component, reduced trade risks considerably, which brought buy-in from business – another aid to sustainability. On a broad scale, the SCT and the customs processes it supported have been sustained, embedded at regional and national levels, with procedures codified in each Partner State. This is an enormous achievement for which TMEA expended much of its collective effort in S1.

Respondents reported that the benefits from the changes would incentivise sustainability – such as government revenue increases and the ease of operations inherent in modernised and automated services. Results from the East African Monitoring System (EAMS) had been published showing the degree of partner state compliance, including amended laws or newly enacted laws, which was reported to be a strong incentive. An implementing partner reported that many of the Common Market Scorecard indicators had been integrated with those of the EAC, and so they felt the continued tracking of these represented some level of sustainability, even if the Scorecard itself would not be funded.

Some respondents from private sector projects were hopeful about sustainability. One country's private sector apex body cited the government's upcoming agenda, which they said featured business competitiveness as a goal. Another apex body was generating funds from its project to simplify issuance of certificates of origin: 'the money is used to pay salaries of system support and administrator, infrastructure, internet services, interconnectivity, and upgrades.' Two industry bodies reported examining options for membership fees, and another said they were looking into charging banks a percentage for access to their large membership. A transport observatory had managed to reduce costs to make sustainability more likely.

Several respondents – among them government, private sector, and civil society – reported that the relationships they built with each other and with government in S1 gave them confidence of sustainability. Participants from the Mombasa Port Charter Community said much the same: that relationships were important, and that the platform had been established and would continue. The institutional framework around the National Monitoring Committees would support their continued operations, according to a ministry respondent. Several other respondents, and those in charge of SMS and online systems, reported that they still required TMEA support to continue. Annex J on the NTBs component has more details on these issues.

A large export capability project respondent felt they could continue to support training in good agricultural practices; a moderate-sized project had focused its training at the level of trainers, to ensure the practices would continue after TMEA funding. Projects that worked with institutionally weaker groups such as cooperatives foresaw problems with sustainability, and one TMEA staffer attributed that to the short-term project: 'Getting twenty organisations certified and trained and accessing markets in two years is hard.... If we let them go now, they'd fall apart. Longer time frames would be more realistic: a full life-cycle would help with sustainability.' Smaller export capability beneficiaries and civil society groups were reported to be completely dependent on donors, without their own sustainability plan or prospects for government support; this was also seen in the TMEA Kenya Country Programme Evaluation.¹²³

While changes in co-op management and even good agricultural practices may continue, costs to renew certifications were reported to be out of reach for co-ops in another project. Projects to certify SMEs in another country ran into similar barriers: despite new standards knowledge, companies were unable to justify the costs of certification in terms of guaranteed revenue. Price competition in the markets they were able to access reliably eroded their interest in the costly certificates to fight for access in more challenging markets.

¹²³ MarketShare Associates. 2018. TMEA Kenya Country Programme Final Evaluation, p.62.

For an agency project in Kenya, respondents had requested quotes on ICT for Trade system maintenance fees to estimate costs and plan for their budget inclusion, prior to signing the MoU with TMEA. Another government project in a cost-share agreement with TMEA said the agency had already budgeted for connecting roads to maximise the benefit of the prior project with TMEA. A single window implementer was investigating possible revenue streams to become more sustainable. The ICT for Trade component focused on inclusive solutions with design inputs from private sector users to ensure a system would be fit-for-purpose, and then chose technology that met that standard even if it was not state-of-the-art; both techniques were used to promote sustainability.

Three external donors found TMEA's 'handholding' with partners a threat to sustainability, by limiting agencies' project ownership: 'Sustainability is linked to an effective handholding process for institutions that allows them to look after themselves by taking full charge of projects over a period of time.' The respondent recommended a capacity assessment at the relevant agencies and decisions about how best to address capacity gaps. Another external donor said infrastructure projects would be sustaining because beneficiary agencies were committed to monitoring key performance indicators and to collaborative planning.

Looking across the SOs, challenges differ, as do the good practices for sustainability that TMEA undertook. These are arrayed in Table 7 below, and additional summary text follows.

Table 7: Main sustainability challenges, risks, and good practices, by SO

	Sustainability	Risks and challenges	Good practices
SO1: Hard infrastructure: Concrete and gates at ports; buildings and roads at OSBPs	Highly likely	Weather pattern changes (less likely); changes in demand (more likely, such as Mombasa Port with the new SGR)	Using good materials and contractors; closely monitoring the work and remediation once it was in use
SO1: Soft infrastructure: better procedures, stronger capacity, better relationships	At risk; already affected	Turnover; leadership changes; changed agency incentives; a range of regular expenditures are necessary, such as water and electricity at OSBPs, but are not always government priorities. Long-term monitoring is a need.	Establishing data collection and use as priorities; inter-agency and bilateral agreements between countries support sustainability of OSBPs
SO2: Strengthening regional EAC trade integration	At risk	Highly dependent on political will across a range of initiatives, and sustainability will vary across them based on political appetite for integration	EAMS and Common Market Scorecard made progress public, which was an incentive for compliance
SO2: New standards harmonisation system	Likely	Depends upon national commitment to regional integration, and as-yet uneven national quality infrastructures	Codified system that reduced costs for harmonisation process
SO2: NTB mechanisms	At high risk; in disuse; funding gaps	Increased protectionism; NMCs not meeting as regularly; online systems in disuse; not codified or paid for by governments	NMCs with public and private attendance; also used bilateral meetings when it would 'save face' for resolving a given NTB
SO2: ICT for Trade single windows and permit processing work	Likely	Lack of developer capacity in government for ongoing development of the systems according to emerging needs, which involves costs outside of those predicted	Incentives are strong; users were brought into process; agencies are looking for revenue streams
SO2: ICT for Trade Customs management systems and RECTS	Likely		Integrating with multiple agencies and coordinating with multiple donors; establishing costs and funding for maintenance; strong incentives
SO3: Advocacy with private sector and civil society	Differs by organisation	Underestimated capacity to manage TMEA budgets and M&E requirements, so they may not be capable on their own – especially smaller and CSO types	Relationship building, capacity building around research, linking up with shared goals like Doing Business indicator targets
SO3: Improved conditions for traders, especially women	Differs by site	Limited interface with EAC OSBP guidance	Responding to beneficiary-identified needs; creating critical mass in some sites;

	Sustainability	Risks and challenges	Good practices
SO3: Export capability	Differs by project, but many are at high risk	Certification was often too expensive or demanding, and costs continue even if TMEA (or government) were to help with initial processes. Stronger linkages with government technical services are needed. Market linkages depend on continued compliance and profitability	Adopted agricultural practices are likelier to continue because trainers have been trained and materials produced in local languages. Ordinances and bylaws locally and international WTO gazettement are good practices
SO3: Logistics	Differs by country, but risks are evident	Platform participants cite meagre association income and continuing capacity needs	Engaging with and helping to build national and regional platforms among industry groups; maintaining standards for transparency

To improve the prospects for sustainability, TMEA should consider working more in-depth with fewer organisations, on longer time scales, to ensure that the organisations do build capacity deeply into their staff and structures. It is also necessary to have insider viewpoints and a strict process for assessing what a given project will require over time – some incentive structures will keep new systems going, like ICT for Trade systems whose users have come to expect them. Others will not: the NMCs and online NTBs systems were much weaker at time of fieldwork than when they made gains during S1.

Where successful legislation efforts are possible, these can have long-term effects; however, where such efforts were not successful, such as the Standards Act in Kenya and reform at the two ports, it is worth considering early rather than later whether to cut losses and turn attention and resources to other pursuits.

Another area to consider systematically is data, as this has important effects during the life of the programme but also in terms of long-term gains. Weaknesses in the TMEA RF in SO3, for example, leave doubts about the scale and potential of new exporters. TMEA and DFID seemed not to question these figures, though some key failings were brought up in the 2016 and 2017 Annual Reviews. TMEA should also consider long-term M&E, how it will be implemented, and by whom, as part of sustainability planning. As in the discussions above around capacity building, fewer and longer-term projects would help to make space for M&E capacity building, so that agencies as well as associations can master basic skillsets. As an example, for OSBPs and ports, these should be built into systems and long-term funding for them secured within governments and/or at EAC level.

3.3.1.1 Conclusions

Capacity building is sustainable only as far as it is embedded in institutions, rather than limited to training individuals. The scope of TMEA's S1 programming makes this challenging, however, considering the vast number of agency employees across six countries and the EAC Secretariat who were involved with TMEA-supported activities. Those projects that resulted in legislation or policy changes, or were included in budgeting or planning, were likely to be sustainable; so were projects with significant private sector buy-in, like SWIFTs and customs management. TMEA sought sustainability through clauses in MoUs and working with steering and technical committees; one proposed solution was to help a parastatal seek alternative revenue sources. However, political economy could and did interrupt best intentions on sustainability. Sustainability was noticeably more in question with SO3 partners from among private sector and civil society associations, SMEs, cooperatives, and other programming at grassroots levels, where initial capacity and funding were weak. Table 6 above provides component-specific findings and issues around sustainability.

DEQ5.20 How are stakeholders engaged through the programme and beyond its life, and how do they take TMEA lessons learnt into account?

In the response to this question, the evaluation team looked primarily at stakeholder engagement after the programme, since there is considerable discussion around stakeholder engagement during the programme in response to DEQs 5.6 on strengths and weaknesses, 5.10 on governance arrangements, and 5.12 on alignment with country systems and agencies. Most SO1 and SO2 partners remained engaged with TMEA in S2 programming, and so were eager to discuss how they had taken TMEA lessons learnt into account. Table 7 presents these lessons by the stakeholder types that reported them. Interview responses often included praise for how TMEA managed the projects with these skill sets, and it appears the agencies and organisations hope to replicate those skills themselves.

Table 8: S1 lessons learnt that stakeholders reported as useful

Lessons learnt	Reported by
Project management skills <ul style="list-style-type: none"> Establish timelines M&E – link activities with outputs Better procurement processes Use knowledge products – like audits and needs assessments – more effectively Professional implementation, ‘on time and within budget’ 	Revenue authorities, EAC and trade ministry respondents
Financial planning and expenditures <ul style="list-style-type: none"> Value for money for donor projects or their own spending, to use resources wisely Ensure a budget line for maintenance post-project A specific sustainability plan Risk or contingency planning Diversify funding streams 	Government partners, association leaders, a CSO
Clearer and longer-term planning around major time categories <ul style="list-style-type: none"> Start land acquisition activities earlier, to avoid later delays Outsource technical studies prior to major infrastructure projects Ensure troubleshooting and knowledge transfer are completed before handover Test assumptions along the way, to be sure what they thought would happen was actually occurring on the ground 	Respondents involved in large infrastructure projects
Relationships and human resource <ul style="list-style-type: none"> Change management around policy or procedural changes with transparency and participation of all staff Facilitate consultative relationships about NTBs, awareness-raising, legislative efforts, or work on the SCT. Have shared goals with the funders Use bilateral meetings to resolve NTBs to minimise defensiveness 	TMEA project staff, ministry staff
Specifically for platforms that united sub-sectors across an industry <ul style="list-style-type: none"> Merge industry subsectors to speak with one voice, and communicate nationally and regionally with those peers Use research and evidence to strengthen policy positions and present them professionally to government 	Industry platform representatives
Export capability projects <ul style="list-style-type: none"> Maintain standards through an internationally recognised mark Train farmers and co-ops, and especially co-op umbrella groups, to train trainers and have wider impact. Training should be very hands-on, including through extension services and on-site visits to make knowledge retention more likely Choose different certification levels for groups ‘at different maturity levels’ because less experienced co-ops could get bogged down, while stronger groups could take a more stringent standard further. 	Export capability partners

3.3.1.2 Conclusions

Stakeholder engagement was a priority for TMEA and resulted in the high-level of ownership reported by many government partners, as reported against DEQ5.6, DEQ5.10 and DEQ5.12. The most commonly cited lessons to be considered were of a project management nature: TMEA had a strong demonstration effect. Agency partners cited lessons from needs assessments, VfM, using timelines, ‘linking activities with outputs’ and using baselines with M&E, improving procurement, and using knowledge products more effectively. Change management – in which staffers’ concerns were carefully considered – was cited as a lesson. Those working on NTBs cited bilateralism as more effective than regional forums. Private sector partners felt the platform model helped them speak with one voice, even across the region, and that using research and evidence strengthened their stances. Export capability partners cited the value of highly ‘hands-on’ training. Both TMEA staff and TMEA donors suggested longer ‘more realistic’ project time frames to avoid extensions.

3.4 Effectiveness: HEQ2

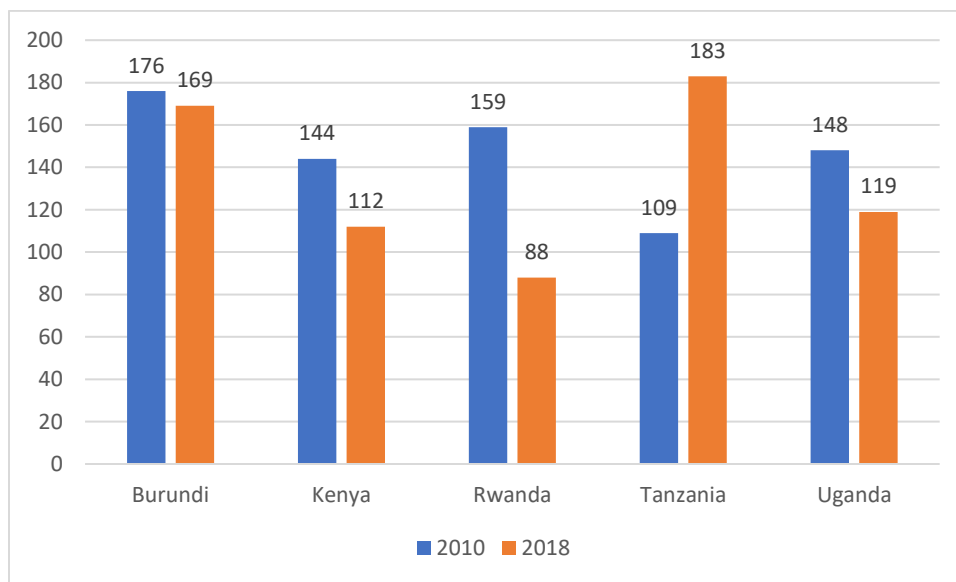
HEQ2: To what extent has TMEA been effective in achieving expected intermediate outcomes and to what extent has TMEA programme been effective in contributing to achieving programme strategic outcomes? Did the programme bring about any unintended outcomes?

Across all countries and at the corporate level, respondents report time reductions which is supported by data on corridor trade times, particularly at nodes where TMEA worked. These time reductions result from clusters of projects in components, as well as from joint gains across SO1 and SO2. SO1 work at ports reduced dwell and truck turnaround time, and OSBPs and the RECTS kept cargo moving along the corridors and reduced risks, earning the buy-in of the private sector. In SO2, permit processing at supported agencies was reduced and customs management systems ensured paperwork was available throughout transport; standard inspection times decreased with faster processing and harmonised standards; and the NTBs team helped reduced weighbridges and checkpoints.

These outcomes were reported by TMEA and its partners and confirmed through triangulation with external private sector firms using the infrastructure and ICT for Trade, standards, and other improved systems. TMEA-commissioned evaluations concur that TMEA met about two-thirds of its planned S1 Programme Intermediate Outcomes (PIOs).¹²⁴

In SO3, cross-border traders can now take goods up to \$2,000 across the borders without taxes. Incomes have increased for many export capability project beneficiaries, per the RF, project reports, and beneficiaries interviewed. 'Doing Business' rankings improved for Kenya (from 106th in 2010 to 61st in 2019) and Rwanda (from 50th in 2010, to 29th in 2019).¹²⁵ The Ease of Doing Business sub-index specifically relating to trading across borders shows improvements in the rankings for four countries, and starkly worsening conditions in Tanzania.¹²⁶ In Figure 5 below, improvements in the ranking for trading across borders were substantial in Rwanda, Kenya and Uganda. (In this case, the lower the figure, the better the score)

Figure 5: Trading Across Borders (sub-index of World Bank's Ease of Doing Business) 2010-2018



Source: Doingbusiness.org. 183 countries were rated in 2010 and 190 in 2018.

¹²⁴ Externally commissioned formative and summative evaluations of Standards, eliminating NTBs, ICT for trade, export capability projects, advocacy projects, country programmes, capacity building at ministries for East African Community affairs, logistics, and challenge grant activities. TMEA procured these evaluations through open competitions for the work against pre-established criteria, and the findings, conclusions and recommendations were overseen by the Evaluation Committee of the TMEA Board. While these are therefore not fully external or independent, TMEA did take steps to minimise bias. PE evidence shows the findings being later taken on board.

¹²⁵ In 2018, Uganda was 127th; Burundi at 168th; South Sudan 162nd; and Tanzania 144th. These are all worse than when TMEA began. Source: TradingEconomics.com.

¹²⁶ World Bank. 2018. Doing Business Rankings and Scores. Data downloaded from <http://www.doingbusiness.org/en/rankings>

3.4.1 Results

The PE used Contribution Tracing (CT) to establish if there was evidence of causal links between TMEA and a set of observable outcomes from six of TMEA's programmatic components. The PE sought to evidence the extent to which the selected outcomes have actually materialised; define the TMEA contribution claim (how it believes it contributed to this outcome), and apply Bayesian probability (See Annex F for a full description) to quantify the probative power of evidence for and against the contribution claim. This section provides a narrative analytical report to document the research processes and communicate the findings for particular outcome gains. The following outcomes sought in each SO were analysed with CT:

- SO1 work at Mombasa Port to reduce import and export time, and at OSBPs to improve average border crossing times.
- SO2 teams supported agencies to reduce permit processing and clearance times; to speed up product testing and increase harmonisation of standards; and to eliminate NTBs that increase time and cost to trade.
- SO3 worked to increase exports by supporting 'export-ready' entrepreneurs and SMEs in targeted sectors through training in standards and support to identify markets.

The outcomes are drawn from selected PIOs, per the selection described in Annex G. The selection was not random and is not 'representative' of all of TMEA's outcomes. Rather, it was purposively selected based on a set of criteria agreed in the design phase, as described in the Methods subsection 2.2.3 on CT, and acknowledges that, as a portfolio programme, TMEA was encouraged to experiment and to take calculated risks, with the expectation that some projects would be more successful than others. These selection criteria were used to identify those outcomes where: TMEA claimed results that would best answer each of the three SO-related DEQs (under HEQ2); related TMEA activities, outputs and outcomes were largely successfully implemented; there was sufficient maturity and potential scale of the impact; and where data are likely to be accessible.¹²⁷

The PE refined those outcomes selected into specific contribution claims directly tied to the SO in which they were housed. In line with the selection criteria, the CT analysis does not show what has happened across every intervention in, for example, SO1. Instead it focuses on those where there were potentially important gains in reducing corridor trade times and/or increasing corridor trade volumes for SO1 (DEQ2.1). For DEQ2.2, CT analysis selected key efforts resulting in what TMEA claims under the SO2 title "Increasing ease of trading across borders". For DEQ2.3, on "Improved business competitiveness," selected exported capability work in SO3 was examined for its effects on export competitiveness.

The evaluation was concerned with establishing whether or not TMEA has contributed to an observed change; in other words, to assessing a causal relationship. Given the characteristics of TMEA, traditional counterfactual approaches to establishing causality were not possible for a range of technical and practical reasons. The six outcomes presented below were analysed using the CT technique described in Section 2.2.3 above, as well as in Annex F. In this case, CT was used to systematically test the contribution claim¹²⁸ TMEA makes by 1) verifying the progress of project deliverables from activities, to outputs, through to outcomes, and 2) the extent to which the evidence supports a causal relationship between TMEA and those outcomes. For each claim, the team:

- Systematically assessed and documented what was done by TMEA to achieve the selected targeted outcomes;
- Identified and evidenced the extent to which the selected outcomes have actually materialised;
- Considered, through extensive document review and interviews, including with government agencies and donors outside TMEA, which other interventions from government, other donors, or the private sector might also be part of the explanation;
- Gathered required data to assess the extent to which TMEA's contribution claim was supported or not supported by the available evidence, by considering both a) the likelihood of seeing this evidence if the claim were true, and b) considering the likelihood of seeing this evidence if the claim were not true; and
- Reached a judgement about the probative value of evidence for each contribution claim (See Annex F for a full description).

This report is intended to provide a summary, with more detailed technical information provided in the Annexes. However, there are some key concepts in CT that are important to understand in discussing the results. Unlike statistical methods, where statistical power is positively correlated with sample size, CT can rely on single

¹²⁷ The evaluation team assumed data quality and the ability of external corroborating data, in addition to TMEA's own data. While this was not always the case, the team assessed data quality and included this assessment in the report.

¹²⁸ A contribution claim is comprised of both an outcome and the causal chain that describes how TMEA claims to have contributed to or caused the outcome.

observations as evidence (Befani and Mayne, 2014). The probative power of evidence relies not on the number of observations, but on the probability of making such an observation in the first place. Where the probability of finding certain pieces or types evidence was high only if TMEA’s contribution claim was true, it served to strengthen the evaluation’s confidence in the claim (sensitivity). Similarly, where the probability of finding evidence if TMEA’s contribution claim was false and/or other exogenous factors made a more significant contribution to the outcomes, it served to weaken the evaluation’s confidence in TMEA’s claim (type 1 error). Through this triangulated analysis the evaluation team was able to reach consistent conclusions about the probative value of evidence using Table 9 below.

Table 9: Determining the probative value of evidence

Acronyms		Probability of Seeing Evidence if Claim is <u>not</u> True						
		VC	VL	L	ALN	UL	VUL	EUL
Probability of Seeing Evidence if Claim <u>is</u> True	Virtually certain	VC						
	Very likely	VL						
	Likely	L		ALN		L	VL	VC
	About as likely as not	ALN						
	Unlikely	UL		UL		ALN	L	VL
	Very unlikely	VUL		VUL		UL	ALN	
	Exceptionally unlikely	EUL		EUL			VUL	ALN

NB: The acronyms in the chart come from the list in the chart: VC=Virtually certain, VL=Very likely, L=Likely, ALN=As likely as not, UL=Unlikely, VUL=Very unlikely, EUL=Extremely unlikely.

The starting point for all claims was a confidence level of 0.5, which describes the claim as equally as likely as it is not. The probability of seeing a piece of evidence if the claim was true was then assessed along the scale in Table 9 – from *virtually certain* to *extremely unlikely* – in order to arrive at a probative value. This analysis was carried out twice: once to assess evidence of the *existence* of the outcome and once to assess evidence of *TMEA’s contribution* to it. Both probative values are captured in tables, and reported in the overall assessment of the contribution claim. The combined judgement about evidence implies a belief about the validity of the claim given the evidence observed (see Annexes F for further explanation of the methodological approach, and Annexes J and N for detail on the evidence and analysis for each particular case).

For example, the existence of an output of improved container capacity featured first in the Mombasa Port case study in the next section is evidenced by before-and after photos and Google Earth satellite shots, as well as evaluation interviews and analyses for the PE and in the earlier Formative Evaluation. Seeing that evidence if the claim was **not** true would be extremely unlikely (EUL). Seeing the evidence if the claim **is** true is virtually certain: the outcome did happen. Then, we look at evidence for TMEA’s contribution in the same way. TMEA has ample contractual and project data that show what it spent, through which contractors, during what time frame to pave the yard spaces. It is EUL that that evidence would exist if TMEA had not been involved; and it is VC that we would see the evidence if the claim is true.

This example is quite straightforward, but where the evaluation team found any doubt, we sought additional evidence, such as evaluation interviews, extant data, observation, or documents that strengthened or challenged given claims. When pieces of evidence at a lower probability are combined, the calculable probability of seeing both or all three pieces of such evidence is stronger. Contradictory pieces of evidence lower the probability. In addition, the evaluation team looked for evidence of other donors’ or government programming or activities that could explain the output or outcome for all CT cases.

These probative values are used throughout this section and in the PIO chapters where the cases are explained in more detail. Deriving a claim to test involved speaking with relevant TMEA and partner actors in detail about activities, outputs, and outcomes, and then focusing in on the contribution claim for specific outcomes by selecting the activities and outputs (including, but not limited to, relevant RF indicators) for which evidence was available. This means that some indicators from the RF are not examined, either because they did not support the specific contribution claim being tested, the indicator or its data were poor (please see exploration of indicator quality in the response to DEQ5.1 in this report and in Annex J with greater detail on individual indicators and their data), or because TMEA removed an indicator from consideration. In this way the evaluation focuses tightly on the contribution claim using the most appropriate data.

The evaluation team examined these cases from activities, to outputs, and to outcomes, and looked at contribution and causality at appropriate levels. The language around causality and contribution used in this report and its annexes is deliberately chosen, in line with standards in the evaluation field. At lower levels of the

results chain, such as activities or outputs, TMEA is more likely to have *caused* the outputs listed in these tables in whole or in great part. That is, the results would not have come about except for TMEA's intervention, TMEA delivered the necessary and sufficient inputs, and monitored and ensured the result. Outputs also depend on amenable external conditions, but TMEA can be considered to have actively and uniquely caused them to happen. Other activities or outputs that might have been pursued but not achieved do not appear in these tables, given that this method traces successful results chains up through the level of that success.

At **outcomes** level, the results are more dependent on a facilitative environment, including government partners' active participation, and TMEA may or may not be the sole key actor – such as when development partners share the work on a given reform or activity. TMEA's contribution may then be considered to fall somewhere on a scale – but quantifying that scale is not generally a simple exercise. We use the word “caused” only at the level of activities and outputs, and “contributed to” when referring to outcomes, to reflect this difference. The word “contribution” is also used when referring to responsibility generally, over different levels.

At the outcome level the evaluation team uses the phrase “contribution claim” to represent the highest level result that is tested explicitly by the CT method. The evaluation team has also worked to understand and make explicit the contributions of other actors, and discussed that in the second “Evidence” column in each table in the cases that follow. Where there are variations on causal or contributory relationships at any of these levels, these have been made explicit.

DEQ2.1 To what extent has TMEA contributed to reducing corridor trade times and increasing corridor volumes?

According to OPM's Formative Evaluation of Ports and OSBPs,¹²⁹ work plans and outputs were implemented at both ports and OSBPs (including IBM work) with minor project delays and some cost variations but not at a level critical to the overall projects. Project management and controls were deemed to be reasonable. Civil works at ports generally progressed satisfactorily in both ports, with some delays but project execution improved with better guidance and systems supported by TMEA. TMEA relationships and investments in capacity building were generally positive and appreciated. Cross-border time comparisons showed that efficiency had improved considerably from 2011 to 2016 with a notable reduction in the average crossing time from Kenya to Uganda from 14 to 3 hours. There were (and are) major questions on the potential effectiveness of the Kagitumba/Mirama Hills OSBP (explored in a later CT case, at section 3.4.4 below). At the Malaba OSBP, time and costs have increased due to ongoing construction works, though the completion of road construction may lead to decreased time and trade costs, as has happened at other OSBPs (Malaba, however, is not a case study in the evaluation, in part because of the incomplete state of works.)

The Formative Evaluation report concluded that the improvements to civil works can be expected to contribute to efficiency gains (and reduced costs) and that the key measure of effectiveness of the TMEA activities contributing towards improved port infrastructure on the pathway to a reduction in trade costs was achieved. The critical shortfall at ports relates to reform and modernisation which is a key assumption in the TMEA results framework. The transition to a landlord port model in the key container segment has not happened in the Kenya Ports Authority (KPA) nor is there intention to pursue this further in the Tanzania Ports Authority (TPA).

The case studies selected for CT within SO1 included Mombasa Port and the OSBPs on one route of the Northern Corridor – including Busia OSBP between Kenya and Uganda, and Kagitumba/Mirama Hills OSBP between Uganda and Rwanda. These are analysed in the sections that follow.

3.4.2 CT Case Study: Mombasa Port

The contribution claim that forms the focus for the evaluation under this component is:

TMEA contributed to efficiency and capacity gains at the port which helped to reduce average time to import and export goods through Mombasa Port (and ultimately make trade more profitable and increase trade volumes) through a combination of hard infrastructure projects and institutional and soft infrastructure work.

TMEA's projects that contributed to this outcome included:

Hard infrastructure

- Container stacking areas and wider roads to the port, esp. the new container terminal
- Detailed feasibility studies to encourage other donors to fund major berth upgrades
- Strategy document to provoke GoK to consult and plan standard gauge rail logistics

¹²⁹ OPM: Ian Scott, Philip Lacey, Peter Omondi, Godfred Shuma, Thomas Otter, David Smith, Alex Hurrell and Saltanat Rasulova. Strategic Objective 1. Deliverable 2C: Effectiveness and outcome-level evaluation And Deliverable 3A: Consolidated Formative Evaluation of Ports and OSBP projects. December 2018

Institutional and soft infrastructure work

- Port charter: collaborative forum for port actors and Northern Corridor agencies to agree on targets for improvements
- Capacity building: complementing the charter as part of a port improvement plan
- One-stop centre to speed up customs clearance, particularly of imported cargo
- M&E on port charter targets done by the Northern Corridor observatory

More information on each of these can be found in the PIO 1.1 chapter in Annex J, and in the CT Case Study data tables and summary table in Annex N (with project narrative, wider data on available results indicators, and sources). The logic was that increased port capacity would result from increased stacking capacity, improved and widened roads and roundabout, and gate access improvements at the Port exit, resulting in less congested port access for trucks. Increased efficiency was addressed through attempts at institutional reform, better collaboration between agencies and faster clearance procedures.

TMEA documents provide evidence robustly supporting the successful delivery of **activities**; these include contracts for the civil works and detailed infrastructure studies; the agreement with the Northern Corridor observatory; and reports on the capacity building efforts. In addition, the PE team corroborated many of these and other facts in interviews with partners and three site visits.

Some of the six **outputs** claimed were related to hard infrastructure: more container stacking; increased capacity for trucks on roads, through the roundabout, and at exit gates; and feasibility studies contracted and shared. Others were 'soft': networking, commitment and regular collaboration of key institutions (including action planning) with the Mombasa Port Charter Community (MPCC); upgraded staff capacity, improved port efficiency based on recommendations for removing bottlenecks, KPA identifying training needs and undertaking training; and the collection and use of Northern Corridor Observatory data. Overall, the evidence at output level supported a probability level of 'Virtually certain' that the outputs materialised, after reviewing the evidence, on three key (bolded) outputs as shown in Table 10 below. These three had direct effects on the key contribution claim, per the re-created ToC, and evidence collected suggested that it was 'Virtually certain' that TMEA's contribution was central to their realisation. The collaboration goal is noted to be 'incipient' (at the end of S1) as this highly political work has taken up a longer period to see the results of the Charter's inception and planning.

Table 10: CT Case Study: Mombasa Port

Output	Evidence of the output, and probative value assigned	Evidence TMEA caused these outputs, and probative value assigned
More, and improved, container stacking and organisation	<i>Virtually certain</i> Evidence: pre/post photos, Google Earth imagery from 2010 & 2017; OPM Formative Evaluation and PE site visits and interviews	<i>Virtually certain</i> Evidence: extensive TMEA reports on yards, White House roundabout, gate 10 approach road. Site visit, interviews with KPA, KeNHA.
Increased capacity for vehicle and cargo traffic	<i>Virtually certain</i> Evidence: triangulated interviews from different stakeholder groups: private sector users, partners, TMEA, NCTTCA staff	<i>Virtually certain</i> Evidence: TMEA and Observatory data on reduced time to import; site visit; confirmation from shippers and logistics firms interviewed
Feasibility studies/designs facilitated and shared	<i>Virtually certain</i> Evidence: Donor conference between Ministry of Trade and TMEA documentation; KPA interviews; Validation meeting of SGR report	<i>Virtually certain</i> Evidence: EIB/AfD confirmation of TMEA role TMEA's SGR support with Permanent Secretary reference letter
Collaboration/ integration and planning between key institutions	<i>Virtually certain</i> but incipient Evidence: MPC and annexes; KPA & GoK MoUs; MPCC reports; Results Framework for MPCC and validation meeting minutes; interviews show PSO/CSO engagement	<i>Virtually certain</i> Evidence: Extensive documentation on Mombasa Port Charter work, including photographed public signing. Mombasa Port Charter M&E plan, annexes, branding.
Improved staff capacity, improved port efficiency	<i>Very likely</i> Evidence: Productivity Improvement Programme baseline and other reports	<i>Virtually certain</i> Evidence: Relevant reports commissioned by TMEA
Northern Corridor observatory data collected, shared	<i>Virtually certain</i> Evidence: NCTTCA data; interviews with the partner and Charter members	<i>Virtually certain</i> Evidence: NCTTCA close-out report, and confirmation from evaluation interviews

Also crucial for time reductions across the corridor were the changes that came about from TMEA's support to the SCT. The Customs management reforms established a destination model for cargo clearance that reduced the number of documents (from three to one) and inspections necessary at borders along the Northern Corridor. This had the effect of reducing demands on Customs teams at borders and allowing them to focus on risky cargo. Rwanda and Uganda deployed staff to the ports to receive and process cargo, which further saved time. The Mombasa Port results chain has elements of this, as well as working groups on corridor processes, as does the results chain of the EAC enabling work (PIO2.1 in Annex J).

In the process of re-creating a ToC for the Mombasa Port work, the evaluation team identified critical outputs that would, if successful, generate the key outcome. Time for import¹³⁰ has three sub-components: The time before Customs processing in which cargo arrives and is registered; Customs processing through the One-Stop Centre; and the time to depart the port after clearance. TMEA outputs on container capacity and efficiency would support faster registration of landed cargo; TMEA projects to integrate and improve collaboration would support faster Customs processing; and the civil works supported truck turnaround time which is a key part of the departure sub-component of time. These three outputs are in **bold** in Table 10 above, were identified as necessary complements to governments and other donor initiatives. The evaluation found strong evidence that these outputs materialised and that it was TMEA that caused them.

The evaluation then considered the evidence that TMEA contributed to **a decrease in the average time to import and export goods through Mombasa Port**, through these outputs, as claimed. The TMEA RF cites a decrease from 11.2 to 5.5 days, a reduction of 51%, over the life of the project. The Northern Corridor observatory (NCTTCA) maintains a database of average port import times that support this improvement. The 2009-2018 trend comprises a period of increased import time from 2010 (120 hours) to 2012 (200 hours), followed by a 2012-14 drop to about 100 hours (4.13 days), which is sustained thereafter. This was against a target of 2.3 days in the TMEA RF, which would have been equal to a 72% reduction time since the 2012 average, a year which coincided with the start of many TMEA activities at the Port. For time to export, TMEA reported a reduction of about 50%, from 15.4 to 7.3 days over the life of S1 from NCTTCA data; however, detailed data on export times were not collected by NCTTCA. Exports comprise less than 15% of Port throughput and are slated to be included in Observatory data during S2. The TMEA RF lists no target for export time, and the PE can confirm only the reduction in import time, which is substantial but less than targeted.

There were significant other donor and government initiatives at the Port. TMEA estimated that they contributed 20% of the overall time reduction; the OPM TGIS estimates 10%. These figures reflect that significant additional work was undertaken by government and other donors, which also affected time to import and export.¹³¹ The combined effect of the interventions as a cluster supported TMEA's contribution claim of the S1 time reductions to import (but not to export), as confirmed when the time data are examined by sub-component. Faster registration of landed cargo was supported by increased container capacity and efficient handling. The One-Stop Centre enhancements led to shorter cargo release, and the shorter wait before cargo left the port included faster truck turnaround time. At the same time, reductions in actual Customs processing time were minimal, and Customs processing was always only a fraction of the other two sub-components of time to import (e.g., measured in hours, rather than days, at five hours in 2010, down to 1.74 hours in 2017). Of the three sub-components, the greatest differences over the life of S1 were seen in pre-customs processing time, and secondarily, in post-release time which is not much lower than the best times prior to 2011 but very consistently at that 'best time' level of around 40 hours.

TMEA's coordinated initiatives at the Port were designed to work together to help reduce time to import in reducing congestion and increasing capacity in hard infrastructure projects; however, other outcomes in terms of efficiency gains through productivity improvement are harder to track through the logic chain. In part, this is because soft infrastructure initiatives were often 'catalytic' in that KPA and other actors took TMEA recommendations on board, such as in the productivity improvement capacity building, but full implementation of the recommendations was not completed in S1. The MPCC was an important achievement for TMEA as well, but there were similarly long time horizons on the actual gains to productivity from the coordinated work of these political actors, such as facilitating quick responses to consignments brought to the One-Stop Centre. Evaluation interviews and document review confirmed the ongoing nature of these activities, as well as the Observatory efforts to capture and utilise related data.

¹³⁰ Time for export, as explained in the coming paragraphs, is not routinely monitored or reported at this level of detail.

¹³¹ The TMEA figure of 20% contribution comes from the S1 Results Meter, where 20% of the time reduction was calculated as part of TMEA's reported 15.3% time reduction across the Northern Corridor. The 10% figure is discussed in the forthcoming TGIS which compared investment dollars from government and other donor sources, finding that TMEA's contribution amounted to 10%. Time reduction and investment amount are not necessarily the same; however, an estimate of between 10 and 20% of the time reduction being attributable to TMEA is justified.

Throughout the evaluation, TMEA claimed to have contributed to two additional outcomes, as below, which were examined through extensive document review and interviews with interested and external partners.

- Donors/lenders agree to finance berth rehabilitation per the feasibility studies
- TMEA supports GoK to develop its SGR policy following the TMEA logistics report & business plan

However, as these did not contribute to the overarching ToC goal of increased trade in S1, they were excluded from the final CT analysis here. Instead, these ancillary outcomes are considered in depth in Annex J and noted where appropriate in the main body of the report.

It is possible, but not documented, that export times would have reduced for the same reasons as did import times, and in similar proportions, given the need to complete most of the same processes but in reverse order.

3.4.2.1 Conclusions

The evidence is very strong that TMEA’s contribution claim to reduced time to import is true, at between 10-20% of the overall time reduction. The probative value of the collected evidence is that TMEA’s contribution to the time reductions is virtually certain, determined through the triangulation of evaluation interviews, data on times and data on TMEA and other donor and government work at the port. Other donors’ and government projects, quantified in the TGIS, support this conclusion. Due to limited evidence, the part of the contribution claim that refers to exports cannot be confirmed or disproved.

Table 11: Conclusion: Mombasa Port

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Import times reduced by 51% in S1 a. Pre-processing, faster registration of landed cargo b. Faster customs processing c. Post processing (incl. truck turnaround) d. TMEA claim 20% of the reduced time to import; TGIS estimates 10%.	<i>Virtually certain</i> NCTTCA’s observatory online updates of the three port processes accelerated for all import cargo and an update of one undifferentiated port-processing variable for containers. <ul style="list-style-type: none"> • Import time reduced from 11.2 days to 5.5 per TMEA RF, against target of 2.3 days • Evaluation interviews with donors, shippers, logistics firms confirm important reductions • KPA Annual Bulletins of Statistics on port performance – throughput, ship turnaround 	<i>Virtually certain</i> TMEA expenditures on projects across Port operations to improve capacity and efficiency. JICA second container terminal came online too late to have affected these measures, though the presence of the terminal will have affected times since the end of S1, as has the advent of the SGR. World Bank interventions on capacity building were also underway during S1. KPA and inspections agencies interviews confirmed the importance of TMEA investments, but other projects contributed.
Export times reduced by 50% in S1	<i>As likely as not</i> Limited NCTTCA data on exports. TMEA RF cites approximately 50% reduction in time to export through the Port, based on NCTTCA data, from 15.4 to 7.3 days.	<i>As likely as not</i> TMEA expenditures on Port capacity and efficiency would also have affected export handling, but the data are not present to support this.

3.4.3 CT Case Study: Busia OSBP

The goal of PIO 1.3 was to speed cargo through border posts by converting these to OSBPs that cluster agencies from both countries at purpose built facilities on each importing side of the border. Agents from both countries would jointly process cargo. Integrated Border Management (IBM) would allow electronic communication among each countries’ agencies on their own side, and between the two countries’ agencies including prior notification of cargo arrival. Border community committees would provide corrective feedback loops on the efficiency of operation. The hard and soft infrastructure would together result in faster processing of imports and exports, contributing to faster overall corridor times and lowered trucking costs.

More information on each step, and a summary table of the results, is found in Annex J, in the chapter on the OSBP PIO, and in Annex N in the CT Case Study data tables (with project narrative, wider data, and sources) and summary table.

The contribution claim that forms the focus for the evaluation under this PIO is:

TMEA contributed to increased efficiency of trade at Busia OSBP through a combination of hard infrastructure projects and institutional and soft infrastructure work that resulted in a reduction in average time to cross the border.

TMEA’s projects that contribute to this outcome included IBM investments in both Kenya and Uganda, and construction works in both Kenya and Uganda.

TMEA documents provide evidence robustly supporting their **activities**; these include contracts and government close-out reports for the civil works (offices, scanner yard, warehouses, inspection shed, storage facilities, access roads, gatehouses and other facilities); meeting minutes and final documents on institutional and legal frameworks including the bilateral agreement between the two countries; ICT and furniture provision details; and extensive reports on training efforts. In addition to document review, the PE team corroborated these activities in interviews with partners, as well as a site visit.

Outputs in Kenya and Uganda at this border included operational OSBP hard infrastructure and integrated systems with trained users for faster processing. TMEA cited other outputs such as a performance management tool, improved staff morale, and improved coordination between government agencies through their committee structure. Documentary evidence and a site visit (with interviews) confirmed the existence of the outputs (infrastructure construction and IBM integration, committee structure, confirmation from officials on training and reports of improved morale). There were no reports of having yet been subject to the performance management tool, and self-interested reports of training, improved morale, and improved agency coordination but these findings lacked independent corroboration. However, disinterested responses from private sector users of the OSBP reported faster processing times, by both AEO users and others without that status. The use of environmental and social impact assessment (ESIA) recommendations in construction and gender action plan were visible only in TMEA materials; however, in both cases, that these subsidiary elements of the outputs are less substantiated do not invalidate the contribution claim which was designed to build primarily on the hard and soft infrastructure.

Table 12: CT Case Study: Busia OSBP

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
Completed hard infrastructure (implementing ESIA recommendations)	Virtually certain Evidence: PE site visit; evaluation interviews; activity evidence of civil works.	Virtually certain Evidence: PE site visit; interviews; activity evidence of civil works. TMEA ESIA report.
IBM operational (implementing gender action plans)	Virtually certain Evidence: Institutional and legal framework documentation; observed IT and office equipment; border official interviews; private sector confirmation of faster processes; EAC Regulations, draft SOPs, training curriculum. RF reports implementation of gender action plans but no mention in EAC OSBP materials and regulations	Virtually certain Evidence: Procurement and ToRs, coordination meetings between governments, TMEA participation in related meetings; interviews with government and others
Capacity building and change management	Virtually certain Evidence: Extensive training documentation – times, dates, places, attendees, curricula – from multiple trainings	Virtually certain Evidence: TMEA-developed materials TMEA-convened trainings, procurement data
Performance management tool in place	<i>Very likely</i> Evidence: EAC reported that the first OSBPs had recently (Dec 2018) been used as a pilot of the tool. No report yet in evidence.	<i>Virtually certain</i> A report of the tool and TMEA meeting notes on validation
Improved staff morale around infrastructure improvements	<i>Likely</i> Evidence: URA staff: ‘ <i>staff morale was higher because they had new offices & internet, computers..., software, intercom... good residential units that were better than those in the area.</i> ’	<i>Very likely</i> Evidence: TMEA involvement in improving facilities (per activities evidence)
Improved interaction and coordination between government agencies	<i>Likely</i> Evidence: ‘ <i>Increasing interaction and coordination between government agencies and between countries</i> ’. ‘ <i>[Border Agencies] were forced to improve on delivery... inefficiency by one ministry leads to delays in the whole system.</i> ’ Busia border officials	<i>Very likely</i> Evidence: Multiple reports from steering committee and other meetings on IBM procedures, with TMEA in attendance

Through re-creating a ToC for this component (please see Annex J), the PE team identified the **bold** outputs above as critical for the results chain leading specifically to the key contribution claim of reduced average border crossing times. One other programme was found to be operating at Busia, but it was begun after TMEA’s work ended, and focused on women cross-border traders. The bolded outputs have the strongest evidence, and the evaluation team is ‘Virtually certain’ both that they occurred and that TMEA delivered them.

The 2016 Busia Time and Traffic Study (TTS) provided evidence that border crossing to Kenya for all trucks had decreased by 1h 9 min (-80%) compared to the 2011 baseline. Crossing times into Uganda had decreased by 1h 35m (-79%). However, traffic was significantly higher in the 2011 sample because it was carried out in the high-volume month of December, and because at the time of that baseline, Malaba border post staff were on strike. This undermines somewhat the validity of interannual comparisons. Nevertheless, the robust improvement appears to be beyond the goal of a 30% reduction by the end of S1. This is independently corroborated by AEO and other private sector users, as well as data from Uganda Revenue Authority data from the Regional Electronic Cargo Tracking System and ASYCUDA World data on clearance times. Partner and stakeholder interviews confirm TMEA's involvement. The infrastructure and IBM programming were TMEA's remit, while government interventions were complementary and reliant on TMEA funding. One other donor, the EU, began working on the Regional Integration Implementation Programme during S1 but that work was directed towards a border economic zone and supporting women cross-border traders and as such had no effect on crossing times.¹³² TMEA claimed 100% contribution to this gain in their Results Meter, given their unique relationship to the OSBP hard and soft infrastructure, while other donors worked on different OSBPs.

TMEA cited other outcomes aside from time: reduced costs of trade, improved user satisfaction levels, increased tax collection, and the start of a transformation to professional trade and an improved trading environment for women. These were examined through document review and interviews with interested and external partners. Transforming to a more professional trading environment, implementing gender action plans, or having higher user satisfaction were not necessary for reduced border crossing times. In the case of reduced trade costs and increased tax collection, they are further along the results chain than reduced border crossing times. As such, these were all excluded from the final CT analysis. Instead, these ancillary outcomes are considered in-depth in Annex J and noted where appropriate in the main body of the report. An additional RF output on the implementation of gender action plans was not considered critical for leading to the outcome, nor was there strong independent evidence of that implementation.

3.4.3.1 Conclusions

The evidence suggests that TMEA's contribution claim of reduced border crossing times through Busia OSBP is true. It is 'Virtually certain' that the claimed outcome was realised, and that TMEA was central to the outcome.

Table 13: Conclusion: Busia OSBP

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Crossing times reduced from 2012 to 2016: a. Ke-Ug (14hr 20 mins to 2 hrs 57 minutes (79 % reduction) b. Ug-Ke from 1hr 26min to 17 minutes (80 % reduction)	<i>Virtually certain</i> Nick Porée & Associates (Pty) Ltd. 2016 Time and Traffic Study. 80% reduction against baseline into Kenya, 79% into Uganda. Baseline may have been elevated due to a staff strike at Malaba that would have driven traffic to Busia. Corroboration comes from two additional sources: <ul style="list-style-type: none"> • Interviews with AEOs and other private sector users • URA RECTS times data; ASYCUDA World data on clearance times 	<i>Virtually certain</i> Weight of evidence of TMEA's contributions. Partner and stakeholder interviews confirm TMEA's involvement; other donors' and government said to be complementary. Results Meter cites 100% contribution.

3.4.4 CT Case Study: Kagitumba/Mirama Hills OSBP

The goal of PIO 1.3 at Kagitumba and Mirama Hills was the same as that in the Busia case above: to speed cargo through border posts by converting these to OSBPs that cluster agencies from both countries at purpose-built facilities on each importing side of the border. The change hypothesis is that agents from both countries would jointly process cargo. Integrated Border Management (IBM) would allow electronic communication among each countries' agencies on their own side, and between the two countries' agencies, including prior notification of cargoes' arrival. Border community committees would provide corrective feedback loops on the efficiency of operation. The hard and soft infrastructure would together result in faster processing of imports and exports, contributing to faster overall corridor times and lowered trucking costs.

More information on each step is found in Annex, J in the chapter on the OSBP PIO, and in Annex N in the CT Case Study data tables (with project narrative, wider data on available results indicators, and sources) and summary table.

¹³² Ojiambo, Benon. 2017. EU supports Uganda in boosting competitiveness. New Vision, Europe Day, May 9, 2017. [https://www.newvision.co.ug/digital_assets/6652ce3b-9165-486a-97b8-3b74e02b31f6/Regional-\(RIIP\).pdf](https://www.newvision.co.ug/digital_assets/6652ce3b-9165-486a-97b8-3b74e02b31f6/Regional-(RIIP).pdf)

Similar to the Busia OSBP, the contribution claim that forms the focus for the evaluation under this PIO is:

TMEA contributed to increased efficiency of trade through Kagitumba/Mirama Hills OSBP through a combination of hard infrastructure projects, road work and institutional and soft infrastructure work that resulted in a reduction in average time to cross the border.

TMEA’s projects that contribute to this outcome included IBM investments in both Rwanda and Uganda, and construction works in both Rwanda and Uganda; TMEA also funded the tarring of a 37-km stretch of road leading to the Mirama Hills post (Uganda side), and two bridges across the border.

In this case, based on a feasibility study for a Kagitumba/Mirama Hills OSBP, TMEA developed a number of activities for the OSBP. First were ToRs for design and supervision and, working with both governments, hiring a construction firm. TMEA also commissioned a land-title study, an ESIA, and a TTS to assess baseline truck flows and crossing times. During construction, TMEA conducted monthly site meetings and inspections. In 2015, after training, government agents moved to the new sites. Two further TTS took place, with measures of user satisfaction. In 2018, the Rwandan government (without TMEA support) widened and retired the approach road to Kagitumba after the end of S1, a project which was likely to continue well into 2019.

TMEA documents provide evidence robustly supporting that these **activities** were delivered; these include the feasibility report, formal documents exchanged with the respective governments, procurement process documentation and contracts with TMEA for the civil works; the TMEA-commissioned baseline TTS; bilateral meeting reports with TMEA involvement and the resulting agreement; training documents and procedures manual from the EAC and TMEA; and ICT and furniture procurement documentation. In addition to document review, the PE team confirmed these activities in interviews with partners and conducted a site visit during the PE and another for an earlier evaluation deliverable.

Outputs in both countries were operational OSBP infrastructure on both sides of the border, including joint-agency offices; parking for trucks, cars and buses; an immigration hall; laboratories for RSB and MINAGRI; a clinic/dispensary; warehousing; a bank and a forex bureau; as well as trained agents and users. Other outputs were the Ugandan approach road and two bridges. TMEA also commissioned the post-implementation TTS. TMEA procurement and branding information, documentary evidence of outputs, a site visit and interviews confirmed all the above except the 37-km approach road, culminating in a ‘Very likely’ rating. The table below lays out the evidence the output occurred, and the evidence of TMEA’s contribution to that output. This table is an abbreviation of Annex N, which contains detailed evidentiary references.

Table 14: CT Case Study: Kagitumba/Mirama Hills OSBP

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
OSBP structures and procedures in place	<i>Virtually certain</i> Evidence: PE site visit; evaluation interviews; activity evidence of civil works. Note, however, that there is no scanner at Kagitumba OSBP, per site visit and interview with official.	<i>Virtually certain</i> Evidence: PE site visit; evaluation interviews; activity evidence of civil works. TMEA ESIA report.
IBM operational	<i>Virtually certain</i> Evidence: Institutional and legal framework document; bilateral CMS operations; interviews with immigration (Rwanda’s lead agency at OSBP), Customs and Standards; ICT – computers, LAN, IP phones, and internet; furniture in place as procured	<i>Virtually certain</i> Evidence: Procurement and ToRs, intergovernmental coordination meetings with TMEA participation (meeting minutes); respondent interviews with government and border users (from PGIS)
Capacity building and change management	<i>Virtually certain</i> Evidence: Extensive training documentation – times, dates, places, attendees, curricula – from multiple trainings with border officials and managers	<i>Virtually certain</i> Evidence: TMEA’s training materials, documentary evidence on convening and covering training costs

TMEA and partner respondents did not cite the performance tool, staff morale changes, or improved coordination between agencies specifically, as happened with Busia interviews. Through re-creating a ToC for this component (please see Annex J), the PE team identified that the three **bold** outputs above are critical for the results chain leading specifically to the claimed outcome of reduced average border crossing times. These three have conclusive evidence both that they occurred and that TMEA contributed, as shown in the table.

TMEA also cited improved user satisfaction levels as an outcome at Kagitumba/Mirama Hills. However, there is no evidence that this contributed to the overarching ToC goal of increased trade in S1 directly. As such, it was excluded from the final CT analysis here. Instead, this ancillary outcome was considered in depth in Annex J and

noted where appropriate in the main body of the report. An additional RF outcome on the implementation of gender action plans was also not considered directly linked to the key outcome, nor was there strong independent evidence of that implementation.¹³³

The 2017 TTS for this OSBP showed average border crossing times for all trucks against the 2011 baseline had decreased by 1h 33 min (87%) by 2017. The changes were more pronounced for container trucks (mostly used for long distances), decreasing 1h 39 min (93%). Sampling took place in different seasons in different years, somewhat challenging the validity of interannual comparisons. Data from NCTTCA and USAID satellite data show that crossing times have increased since S1 ended, or at least that there is variability within a large range. However, given experience at other OSBPs and the successful construction and IBM efforts, it is still very likely that the OSBP surpassed its goal of 30% reduced average border crossing time in S1. TMEA claimed 100% contribution to this gain in their Results Meter. The evaluation found no other donors working at this OSBP, in interviews with government agencies, including border officials, and with those working on EAC OSBPs.

Reduced border crossing averages would not be difficult to achieve with the low traffic flow at the OSBP. Only 55 trucks were passing daily (total for both directions) according to the TTS, of which 74% were empty trucks entering Uganda. The remaining flow of around 16 trucks daily – which was even more than what evaluators saw in their visits – would be easy to process with the new OSBP and IBM. With the OSBP having such excess capacity, judging the TMEA interventions against the key contribution claim would paint too rosy a picture.

Several factors contribute to this low traffic level. The border was not, at that time, working on a 24 hour-7 days schedule. Also, TMEA’s work to tar the Mirama Hills road ended later than expected. When it finished, Rwanda began a 70km construction effort on its own access road. Transporters have also long used and seem to prefer the Katuna-Gatuna border crossing for its faster route from Kampala to Kigali. Most of these factors were out of TMEA’s control, but the low traffic level – while not invalidating the time reductions found by the TTS – do not confirm that the OSBP would be able to maintain those reduced times if traffic were at the levels initially forecasted. An early feasibility report on which the decision to intervene at this border post was made offers little clarity: figures sometimes lack unit information or clarification about the scope of its traffic predictions.¹³⁴

Based on evidence from other TMEA OSBPs and the construction, IBM, and training at Kagitumba/Mirama Hills, it is reasonable to predict reduced border crossing times. All of these are attributable to TMEA as there were no other interventions at the border post. It is ‘Very likely’ that the OSBP meets TMEA’s much lower target of 30% reduction. However, it is not possible to predict what level of traffic would challenge those gains. The evidence thus suggests that it is ‘Likely’ that the key outcome was realised, and that TMEA’s influence was central to it. However, low traffic flow also negates a further TMEA claim of impact on trade. The OSBP would have had to have captured trade flows from the competing border at Katuna-Gatuna, which did not happen.

3.4.4.1 Conclusions

The evidence suggests that TMEA’s contribution claim of reduced border crossing times through this OSBP is Likely. It is ‘Likely’ that the claimed outcome was realised, though ‘Virtually certain’ that TMEA was central to the outcome.

Table 15: Conclusion: Kagitumba/Mirama Hills OSBP

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
<p>Crossing times reduced from 2012 to 2017:</p> <p>a. Ug-Rw from 5 hrs to 1 hr 15 minutes (75% reduction)</p> <p>b. Rw-Ug from 1hr 47 min to 15 minutes (80% reduction)</p>	<p>Likely</p> <ul style="list-style-type: none"> • 2017 TTS showed 75% reduction against 30% target. • TTS were conducted in different seasons, so comparisons are not entirely credible. • Low truck flows limit scope of outcome and confidence that gains would remain in the event of expected trade flows. 	<p>Virtually certain</p> <p>PE site visit; evaluation interviews; activity evidence of civil and IBM works; commissioned reports and procurement information; the lack of other donors or government involvement</p>

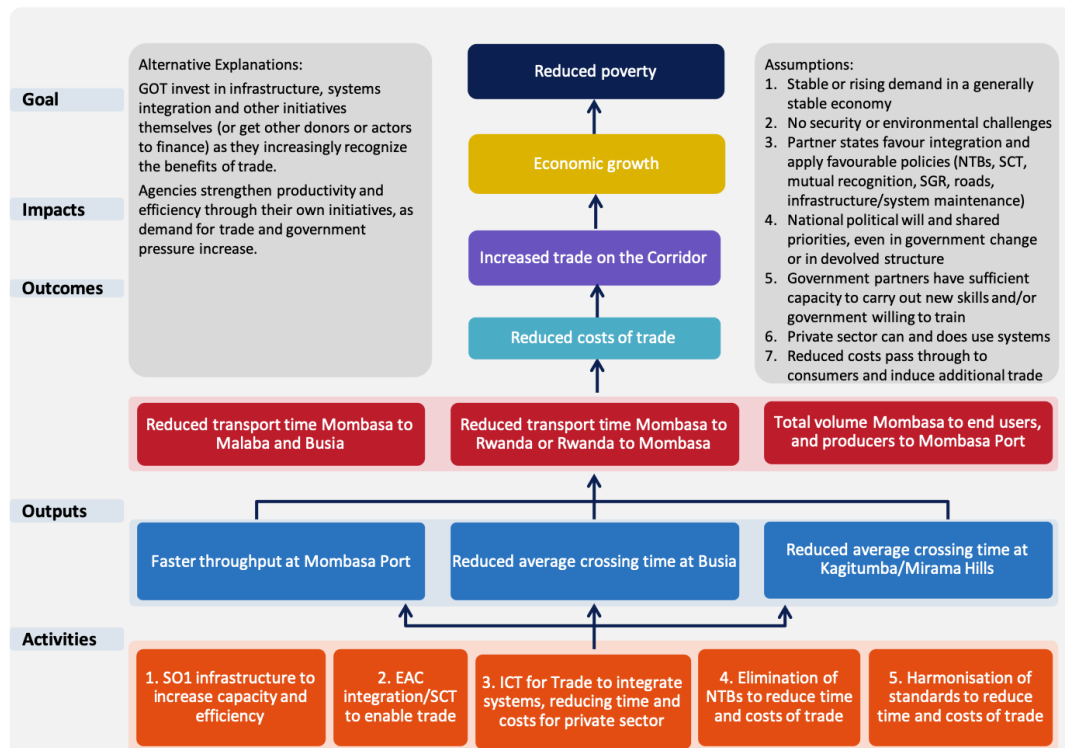
¹³³ An RF indicator on incorporating gender sensitive activities alongside IBM is excluded here. The RF reports its full implementation. TMEA training materials reference gender and women cross-border traders, but these do not appear in the EAC OSBP Act, Regulations, or Manual, or an Operational Manual for Uganda and Rwanda.

¹³⁴ Tom O. Oketch & Associates. 2009. Final Feasibility Report. Mirama Hills/ Kagitumba Border Post-Survey to prepare drawings and cost estimates for a new juxtaposed border crossing between Uganda and Rwanda

3.4.5 CT Case Study: The Northern Corridor

The Northern Corridor presents an opportunity to look at TMEA contributions in S1 across a functional goal. This case looks across the verified outcome claims within SO1 and SO2 on the Corridor. The case was compiled by the evaluators rather than explicitly queried of the TMEA team. It is at a higher level of the TMEA ToC, as in the re-created ToC, below. In it, direct and enabling components (Mombasa Port and the OSBPs; ICT for Trade; Standards and EAC integration) would reduce average border crossing times and increase throughput at the Port, while also affecting transit times through ICT for Trade, standards and NTBs interventions. At the next higher outcome level, corridor times overall would drop according to the re-created ToC. The hypothesis is then that trade would cost less, more traders would find the conditions for trade more conducive, and they would be more competitive, resulting in increased trade. Significant trade increase would lead to economic growth, and poverty reduction.

Figure 6: Re-created Northern Corridor ToC



Many assumptions underlie this ToC, from a favourable economic climate to steady, competent commitment from each partner state. The private sector would also need to take advantage of the opportunities offered by lower time and costs of trade, to increase production and export. A further assumption is that the reduced costs for traders and transporters would pass through to consumers, inducing additional trade. Each of these assumptions would need to be monitored and any variations investigated for the extent of their effects on the overall ToC, through economic growth and reduced poverty, at the top of the figure.

While in Annex J the evaluation team recreated the ToCs for each component, this is an amalgam of the higher-order changes from SO1 and SO2 components, leading to TMEA's overarching trade goals, which in this case study is applied specifically to the Northern Corridor. The goal of the work was to reduce time and costs of trade to spur trade in the region. This was to be achieved through the confluence of:

- Infrastructure projects that increased capacity at Mombasa Port
- Capacity and institutional work at the Port to increase efficiency
- Implementation of the SCT and other regulatory structure that would enable trade
- Integrating Customs Management Systems (CMS); establishing Single Windows; and installing a Regional Electronic Cargo Tracking System (RECTS) to facilitate faster, less costly, less risky trade processes for the private sector
- Eliminating excess weighbridges and other NTBs with consultative processes involving transporters, traders, industry, and policy makers
- Harmonising standards to minimise time and costs for inspections; improving quality infrastructure

The evaluation team poses the following key contribution claim for the Northern Corridor:

TMEA contributed to reduced transport times and costs on the Northern Corridor through the conjoint efforts of the related SO1 and SO2 components.

This case is at a more macro level. Using the CT format, the activities described above are aggregated into programme level outputs, as shown in Table 16; all of these are critical to achieving the key contribution claim for the key route to Kigali.

Table 16: CT Case Study: Northern Corridor outputs

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
Faster port throughput at Mombasa Port	Virtually certain (S1) Evidence: NCCTTA data show time reductions at the Port. <i>In 2019, times have increased again with new inspections; SGR takes half of containers formerly processed by KPA to an inland depot with a poor time record.</i>	Virtually certain Evidence: infrastructure and efficiency programming; confirmed in large part by private sector. TMEA estimated 20% contribution; TGIS modelling says 10%
Reduction in crossing time at Busia	Virtually certain Evidence: <ul style="list-style-type: none"> TTS showed Busia Ke→Ug times falling 79% and Ug→Ke 80% from 2011 to 2016 URA data 2015-2018 show somewhat less reduction but pattern remains. By 2019, NCCTTA show steady average times Ke → Ug from 1.5 and 3 hours and USAID-sponsored satellite data show 2h 20m → Ug and 0h 12m →Ke. 	Virtually certain Evidence: TMEA infrastructure and IBM programming. Results Meter gives TMEA 100% credit for time savings at OSBPs.
Reduction in crossing time at Mirama Hills/ Kagitumba	Likely Evidence: TTS showed 15m into Uganda in and 1h 25m into Rwanda in September 2017; NCCTTA and USAID data show 24m crossing into Uganda and 2h 48m into Rwanda from 2017 to 2019, suggesting deterioration.	Virtually certain Evidence: No other donors found to be implementing. Results Meter gives TMEA 100% credit for time savings at OSBPs.

Important components of this gain come from TMEA's support to the SCT. The Customs management reforms established a destination model for cargo clearance that reduced the number of documents (from three to one) and inspections necessary at borders along the Northern Corridor. This had the effect of reducing demands on Customs teams at borders and allowing them to focus on risky cargo. Rwanda and Uganda deployed staff to the ports to receive and process cargo, which also saved time.

The TMEA Results Meter calculated a time savings of 15.3% directly attributable to TMEA's efforts at these nodes. At the end of S1, the measured effects of these outputs in the TTS and NCTTCA data were largely positive, though conditions have changed in important ways since then, affecting those gains. Border crossing and port time reductions reflect related interventions from SO2 in Customs systems integration and reduced inspection times. Cost reductions would comprise time reductions at the port and at borders, and on the corridor, such as the reduction of weighbridges and other NTBs. Political economy changes affected these gains: since the end of S1, time reductions at Mombasa Port have deteriorated with new requirements for inspections, while the advent of the SGR has meant that more than half of the containers once processed at the Port are now sent by rail directly to an overburdened inland container depot (ICD).

Busia border post appears to have largely sustained improved times, while at Kagitumba/Mirama Hills data indicate a deterioration in the gains made by the end of S1. However, this may not affect the corridor overall times, since data also show that transporters and traders have continued to use a different border crossing into Rwanda.

These outputs bring their verification from their individual cases, such that the evaluation is Virtually certain that TMEA contributed to (between 10 and 20% of Faster port throughput, and to reduced crossing times at Busia OSBP (~100%). Reduced times at Kagitumba/Mirama Hills are 'Likely', but the effect on corridor times is very slight considering the low traffic flows.

The results logic behind the Northern Corridor outcomes, shown below, is not based entirely on these SO1 outputs, but also include gains in time and cost from eliminating escorts and NTBs on the corridor transit – not just at the nodes, as in the re-created ToC above. Similarly gains from another Rwanda SO1 project – the Kigali inland port – would also factor into any overall time savings. These outcomes – on transit time from Mombasa to Malaba or Busia, and time to transport goods between Mombasa and Kigali – are shown in the table below.

3.4.5.1 Conclusions

Table 17: CT Case Study summary: The Northern Corridor

Outcome	Evidence of the outcomes, and probative value assigned	Evidence TMEA contributed to the outcomes, and probative value assigned
Average reduction in transit time from Mombasa to Malaba and Busia	<p>Very likely</p> <ul style="list-style-type: none"> Expanded NCTTCA data¹³⁵ show average 2010 and 2018 times from Mombasa Port exit to exit Kenya: <ul style="list-style-type: none"> 61% reduction to Malaba: 11.1 days to 4.3 days 72% reduction to Busia: 14.7 to 4.1 days Variance also reduced, which reduces risk and uncertainty. But variances remain high. External private sector respondents report consistent transport time gains. A 2014 JICA GPS study found similar gains. TMEA-supported NMCs reduced weighbridges and checkpoints but time reduction is hard to quantify.¹³⁶ RECTS is used with 20% of shipments that save 30-60% time of non-monitored consignments.¹³⁷ 	<p>Likely</p> <p>TMEA's work with NMCs to eliminate NTBs, particularly weighbridges and checkpoints, is in evidence, along with the work with first URA, then KRA, then RRA to establish a shared RECTS that automated and systematised risk assessment to prioritise consignments for e-monitoring.</p>
Average time to transport goods from Rwanda to Mombasa Port	<p>As likely as not</p> <ul style="list-style-type: none"> No independent baseline available for this route; TMEA RF says 5.4 days. The EAC's 2012 Time Release study cites 21.2 days with STD of 9.8 days for Kampala to Mombasa. USAID data (2019) say 5.5 days Kigali → Mombasa, which indicates strong reduction. However, NCTTCA do not monitor exports, and TMEA gives no export figure. 	<p>As likely as not</p> <p>This outcome was not monitored, but given the likely positive outcomes on the import route and the shared use of TMEA-supported CMS, OSBPs, reduction in weighbridges and other NTBs, changes in standards regimes and inspections, etc., it is at least as likely as not that TMEA contributed to reductions in export times as well. It is not possible to estimate TMEA's contribution to time reductions, as these are not quantified for exports.</p>
Average time to transport goods from Mombasa Port to Rwanda	<p>Likely</p> <ul style="list-style-type: none"> No 2010 baseline available for this route. The EAC's 2012 Time Release study cites 18.1 days with STD of 10.5 days for Mombasa to Kampala. TMEA's Results Meter says Mbsa → Kigali 5.7 days USAID source (2019) says Mbsa → Kigali 7 days RECTS data (2018) say Mbsa → Magerwa (Rwanda) 8 days KRA/URA data show 13.3 days (2010) to 5.1 days (2018) Mbsa → Kampala; STD has reduced but significant variance remains. Limited NCTTCA data for Mbsa → Kigali show 8 days (2014) to 6.2 days (2017). External private sector respondents report consistent transit time gains. 	<p>Likely</p> <p>Reduction in times on this route is supported by the range of route data provided by TMEA's partners in August, 2019; the combined work on Malaba and Busia OSBPs, RECTS, NTBs (esp. weighbridges), the ICD in Rwanda, ReSW, CMS in Uganda, testing/inspection savings is likely to have had an effect on these times. However, no effects from the Kagitumba/ Mirama Hills OSBP should be inferred, given the low volumes at that OSBP. It is not possible to set a reliable value for TMEA's contribution relative to the myriad other factors on this route, such as government works and systemic changes in imports and exports.</p>
Reduction in costs of trade	<p>Likely</p> <p>Evidence: NCTTCA data show decreased costs of trade from 2010 to 2018 between Mombasa and the other capital cities of the region.¹³⁸</p> <ul style="list-style-type: none"> The 2015 CPCS study compares direct and indirect costs from 2010 to 2015 and finds that while trucking costs remained roughly the same, hidden or indirect costs have reduced dramatically (74%) for Mombasa → Nairobi transit. Other routes are also dissected for 	<p>Likely</p> <p>Cost reductions linked to time reductions (nodes, and corridor segments to Kampala) show TMEA contribution. Time reductions at Mombasa Port and OSBPs alone (where TMEA's contribution is estimable) ensure that a non-negligible component of cost reductions come from TMEA Port interventions (10-20% of which is attributable to TMEA) and Busia and</p>

¹³⁵ In the process of revising this report, TMEA questioned an earlier version which found no likely changes in the corridor transport times, and was able to access baseline and additional data from their partners, particularly URA, KRA and RRA, to support their assertion that overall transport times had decreased on key segments of the Northern Corridor, including times from Mombasa to Busia and to Malaba. These newly accessed data better align with wider and disinterested reports from private sector respondents who nearly universally cited reductions in transport times along the Northern Corridor. These reductions (or their 2017 equivalents) were not included in TMEA's Results Framework (RF), likely because of the use of TMEA's Results Meter to show overall changes with more detailed case information for attribution.

¹³⁶ The Law & Development Partnership. 2016. Formative evaluation of TMEA projects on non-tariff barriers to trade. 17 February 2016. TMEA

¹³⁷ Kenya Revenue Authority, Rwanda Revenue Authority, Uganda Revenue Authority. 2018. Regional Electronic Cargo Tracking System (RECTS). Half Year July-December 2018 Report. TMEA.

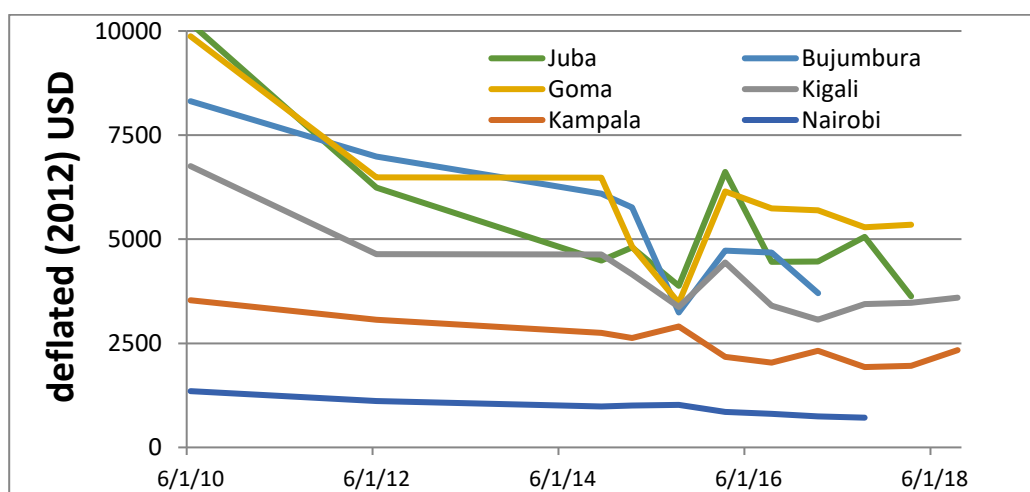
¹³⁸ Authors' analysis of data downloaded from Northern Corridor Transit and Transport Coordination Authority (NCTTCA) Trade Observatory at top.ttcanc.org/indicators.php

Outcome	Evidence of the outcomes, and probative value assigned	Evidence TMEA contributed to the outcomes, and probative value assigned
	cost changes and reductions are nearly universal, though at different rates (31-32% for Mombasa → Kigali and Mombasa → Kampala for example).	Malaba OSBPs (of which likely 100% is attributable to TMEA). Other SCT-related interventions (eliminated NTBs, reduction of inspections, RECTS, CMS and ReSW) are likely to have contributed to cost reductions, by virtue of time reductions, but as these are not captured in data, contribution cannot be reliably assessed.

Average transit time to Mombasa and Busia, average time to transport goods from Mombasa to Kigali, and reductions in costs linked to time reductions show convincing gains, as shown in the table above. Evidence for improvements in average transit time to Mombasa and Busia support a rating of ‘Very likely.’ The case of Mombasa to Kigali is measured by somewhat less continuous data, but with consistent gains where data are available – including data on Busia to Katuna (on the border with Rwanda) and Malaba to Katuna routes from URA, and separate data from Katuna border post inland to Kigali from NCTTCA. These data do not take the Katuna-Gatuna border into account, which introduces some uncertainty; however, later RECTS and USAID data confirm approximately 8 days overall on the route, which coincides with summing the other times and leaving 1 to 1.5 days for that border time.

Given that the data support overall corridor time reductions in S1, the evaluation team finds ‘Likely’ a parallel result in reduced transport costs per the re-created ToC, as described in the final row of Table 16 above. NCTTCA data also support decreased transport cost from 2010 to 2018 along the Northern Corridor, in deflated 2012 USD:

Figure 7: Transport cost from Mombasa Port to East African capitals, 2010 - 2018



Source: Authors’ calculation from NCTTCA data

The NCTTCA Observatory does not monitor exports because they represent less than 15% of trade, but given the coinciding improvements elsewhere on the corridor, average times are at least ‘As Likely as Not’ to have improved as well, using the CT rubric. For the remainder of the outcome indicators, the evaluation finds TMEA’s contribution ‘Likely’. The key contribution claim, therefore, that “TMEA contributed to reduced transport times and costs and increased trade volumes on the Northern Corridor through the conjoint efforts of the related SO1 and SO2 components,” is considered ‘Likely’ by virtue of the evidence.

Data on trade volumes show mixed results: TMEA report net loss in value and volume per NCTTCA data on tonnage between EAC ports and end users, while KPA report increasing trade at a rate commensurate with the trend prior to intervention. Among the four countries, Tanzania and Rwanda decreased in imports and exports, while Kenya’s exports increased 4.5% and imports increased 3.7%. Uganda’s exports increased 1.8% and imports 0.5%.¹³⁹ Intra-EAC trade also dropped in 2014, as described in detail in section 3.1.1.8 of this report. As a result, the evidence does not support the impact-level goal of increased trade. The TGIS examines the question of increased trade using different and more in-depth methods, including any TMEA contribution.

¹³⁹ Atlas system, Massachusetts Institute of Technology. <https://atlas.media.mit.edu/en/visualize/line/hs92/import/ken/all/show/1995.2017/>

DEQ2.2 To what extent has TMEA contributed to increased ease of trading across borders?

According to OPM’s Effectiveness and Outcome-level Evaluation,¹⁴⁰ SO2 projects scored well on effectiveness and the evaluators’ overall assessment was that they were well implemented and that outputs are contributing to the wider outcomes of the TMEA ToC. Most outputs were not achieved on schedule: there were delays in the completion of activities caused by the multi-stakeholder, multi-country aspect of the projects including changing political circumstances. The report also suggested that most projects would achieve their outputs, given time. Another key issue across most SO2 projects was a lack of institutional capacity. In several cases, capacity building initiatives had to be changed during the course of implementation to accommodate new understandings of gaps and challenges. The report recommended that across all projects, extending timelines and allowing more room for likely delays would, if not lead to more effective projects, at least allow for more realistic project management.

3.4.6 CT Case Study: ICT for Trade

The goal of PIO 2.2 was to increase ease of trading across borders through effective trade systems, agencies, and procedures. Trade is more effective with simple regulatory systems, non-duplicative requirements, and streamlined procedures, including those that can be performed online. ICT4T interventions were closely aligned with stakeholder priorities through consultative processes and a set of committees established for each project within receiving institutions. Change management was a focus throughout, including in capacity building on systems.

The ICT4T activities linked EAC countries’ Customs Management Systems (CMS) together for the Northern Corridor, and within countries to speed processing of cargo in the SCT. The integration of Customs systems allows Customs agents at ports and OSBPs to jointly process cargo, and with integrated Single Window (SWIFT) functionality, the systems include the necessary permits for each consignment, as with Rwanda’s electronic Single Window (ReSW). SWIFTs also allow private sector users to apply for permits prior to transport, often from multiple agencies, through portals with consolidated and streamlined trade information. Authorised Economic Operators (AEOs) are firms that TMEA audited to approve their expedited processing at OSBPs. And the Regional Electronic Cargo Tracking System (RECTS) provided security for consignments that once had to be escorted, in slow-moving convoys, along the Northern Corridor. Each of these was to provide time savings for traders and for government agencies charged with processing them.

The key contribution claim that forms the focus for the evaluation under this PIO is:

TMEA contributed to increased ease of trading across borders through a combination of ICT for Trade interventions resulting in time and cost savings for traders.

Table 18 sets out the main ICT4T activities against the types of time savings they were to have at different points in trade processes.

Table 18: Main ICT4T activities and their theorised contribution to time savings

System	Main activities and rationale	Time savings
CMS	ASYCUDA World in Rwanda and Uganda; better integration between agencies and countries in the EAC	Singular processing of duties that are automatically sent to destination country; transit paperwork arrives at OSBP before goods
AEO	Firms applied to and were audited by TMEA to earn expedited trade processes as a means to manage trade risks	Firms that were accepted were able to cross borders without inspections
SWIFTs	Supporting agencies’ import and export permit processes	Reduced time to access permits and process documents for trade
RECTS	Covering Kenya, Rwanda, and Uganda on one system that obviates the need for escorting sensitive cargo	Ending the need to wait for escort and travel in convoys; reducing time for emergency response; limited interventions on cargo under surveillance

More information on each of these, including country-specific systems, can be found in Annex J in the chapter on PIO 2.2, and in Annex N in the CT Case Study data tables (with additional narrative on the projects and country experiences, specific data, and sources) and summary table.

¹⁴⁰ OPM: David G.V Smith, Joel Moktar, Timothy Hobden, Theo Sands, Antony Wahome and Caroline Raes. Workstream 2: Deliverable Deliverable 2D: Effectiveness and Outcome-level Evaluation SO2 and Deliverable 2E: Effectiveness and Outcome-level Evaluation SO3. Revised Draft. January 2019

TMEA documents provide robust evidence supporting their **activities**: ToR for implementation of systems, a feasibility study for electronic Single Window in Rwanda, design and development documents, multiple PARs and a business process flow document from one project, steering committee interviews and meeting documentation, internal government documents, published articles on the use of a system from Rwanda, consultancy contracts, and internal M&E and TMEA-commissioned evaluations.

Outputs for ICT4T activities included delivery of systems – SWIFTS, CMS/ReSW and RECTS – and trainings for systems users. Documentary evidence and multiple site visits and interviews confirmed the existence of the outputs. Multiple disinterested responses from private sector system users reported faster processing times, including both AEO users and others without that status. Other donors’ inputs, where infrequently encountered, were complementary to programming. UNCTAD and TMEA worked together to upgrade ASYCUDA World in Uganda; but the World Bank’s initial work on electronic cargo tracking was left unfinished when TMEA took it up.

Table 19: CT Case Study: ICT for Trade

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
Delivery of CMS – software, data centre, registered users web application, housed in governments	Virtually certain Evidence: Site visits, including reviewing systems; partner, AEO and other private sector users confirm use of systems at OSBPs; usage data suggest increased use; TMEA M&E and TMEA-commissioned evaluations	Virtually certain Evidence: Procurement, design, and operationalisation evidence alongside complementary investments from other donors and government; TMEA was key actor in systems cited here
Delivery of Regional Electronic Cargo Tracking (RECTS)	Virtually certain Evidence: Site visit confirmed RECTS system in use; evaluation interviews with AEOs and external private sector confirmed its operation.	Virtually certain Evidence: Interviews confirm TMEA role and other donor groundwork – WB left ECTS unfinished
Delivery of SWIFT systems and portals	Virtually certain Evidence: Usage data in one country; Partners, AEOs and external private sector interviews confirmed usage in Rwanda and Uganda	Virtually certain Evidence: Evaluation interviews confirm TMEA role; reports including evaluation of SWIFTS and one of ReSW Rwanda.
Trainings for systems users	Virtually certain Evidence: Training data; TFDA Swift Portal Report on training of trainers and sensitization; external interviews confirmed SWIFT and CMS trainings, including apex bodies in the transport sector	Virtually certain Evidence: Interviews confirm TMEA role; Training attendance register in TMEA-commissioned evaluation

Through re-creating a ToC for this component (please see Annex J), the PE team identified all of these outputs as critical for the results chain leading specifically to the key contribution claim of easing trading across borders. Agencies selected were important agencies in terms of volume of transactions potentially to produce outcomes, but it would also have been possible to prioritise agencies differently (please see the PIO in Annex J for that analysis). Though other donors and government initiatives worked with revenue authorities and in parallel programming, it was TMEA’s interventions that delivered the systems, dedicated funding and personnel, and ensured training. Based on the evidence, it is ‘Virtually certain’ that each of the outputs occurred, and that TMEA was in large part responsible for them. There was one important exception: the integrated CMS (iCMS) in Kenya, a centrepiece for the region-wide functioning of the system, has not yet been delivered, as it was delayed by a contested bid and other implementation challenges.

The evaluation then considered the evidence for TMEA’s claim of having contributed to reduced time and costs to traders. The RF indicators for the component are helpful but not entirely conclusive, because of the wide range of programming. The indicators are shown in the following table:¹⁴¹

¹⁴¹ TMEA dropped an indicator (Reduction in total number of documents required to import and export) which corresponded to an indicator in the World Bank’s Ease of Doing Business method of measuring its “Trading Across Borders” sub-index, when the World Bank stopped collecting it in 2016. The TMEA 2015/2016 RF reports it is ‘no longer being tracked’. In In 2017, the DFID Annual Review recommended dropping this indicator.

Table 20: Outcomes: ICT for Trade

Outcome	Evidence of the outcomes, and probative value assigned	Evidence TMEA contributed to the outcomes, and probative value assigned
Reduction in clearance time	<p>Very likely</p> <p>Average times imprecise across some 45 different systems.</p> <ul style="list-style-type: none"> Logistics firms, freight forwarders' association, shippers report streamlined process; no paper; monitor progress online. Ugandan firm said average time better by half. TMEA SWIFTs Formative Evaluation reports time reduced from 86 hours (3.6 days) to 10 hours... 89% reduction against target of 80%. TFDA SWIFT Report: 98% reduction in time to acquire permits, licences, or certificates, from average 135 hours to less than 2 hours. 	<p>Very likely</p> <p>Evaluation interviews say TMEA's responsibilities in delivering these systems were distinct from those of other development partners.</p>
Reduction in number of transit trucks under physical escort	<p>Virtually certain</p> <p>Evidence: Usage data in one country; Partners, AEOs and external private sector interviews confirmed usage in Rwanda and Uganda</p>	<p>Virtually certain</p> <p>AEOs and partners said TMEA's role was necessary to get RECTS in place; agency efforts were complementary; WB left ECTS unfinished</p>
Reduction in trade costs	<p>Very likely</p> <p>Interviews confirm cost reductions. Association cites 15% reduction in costs on certificates of origin; major logistics firms report labour costs saved; TMEA Formative Evaluation of SWIFTs reports 'Cost per transaction from US\$58 to US\$8 (86% reduction against target of 80%) contributing to estimated savings of US\$9m over the life of the project. One Kenyan exporter said costs had remained constant.</p>	<p>Very likely</p> <p>Evaluation interviews say TMEA's responsibilities in delivering these systems were distinct from those of other development partners</p>

The outcome in reduced clearance time is backed by strong indications from a TMEA-commissioned Formative Evaluation on the SWIFTs from 2018, which calculated an overall 89% reduction against a target of 80%. A Tanzania SWIFT portal report cited a 98% reduction in time from 135 to 2 hours; however, from evaluators' visit to see the system, the calculation appeared to have been taken from a subset of simple permit cases, rather than reflecting the full range of permit processes. The methodology for determining the initial 135 hours was not documented and did not fully square even with the description of laborious pre-SWIFT processes and visits to various offices. A 2015 report from Rwanda showed positive gains where TMEA focused on the Yellow Channel because of its high level of documentary processing; gains in the Yellow Channel were shown to be sustained and improved upon by the end of S1, in a set of Rwanda government reports.¹⁴² Data from CMS were made available by one country, but the revenue authority could not delineate for the evaluation team how much of overall clearance times were for CMS processing and how much for other functions. The responses from AEOs, other private sector users, logistics and shipping firms almost unanimously confirm substantial time reductions in Uganda and Rwanda, but could offer no robust average figures of the extent of the reduction that came from ICT4T systems.¹⁴³

Interviews with partners and donors confirmed TMEA's key and unique role in providing the technical expertise for the new systems. The evaluation team is confident that users enjoyed time reductions that were generated by TMEA's work though the average time reduced is difficult to quantify for all users because so many systems were affected (45 as reported by TMEA for S1). The evaluation team calculates a probability of 'Very likely' that the key contribution claim is true and that TMEA is responsible for the change.

TMEA claims 100% reduction in the total number of transit trucks under physical escorts in 2016, against a baseline of 50 trucks per day in 2013 – a figure which reflects the sectors' own efforts to monitor transport electronically prior to TMEA's support.¹⁴⁴ Logistics firms in the three countries confirm time savings and the

¹⁴² Rwanda Revenue Authority (RRA). 2017. Time Release Report. RRA Customs Services Department, Period October to December 2017. Rwanda: Kigali. It is important to note that the Yellow Channel (on which TMEA focused) processed around 10% of all shipments. The ReSW Formative Evaluation cited above also noted that overall the Rwandan government was inspecting 42% of all shipments in 2014, triple the percentage inspected in 2012 – which RRA credited to increased staff availability for this work. However, time savings in the less-risky channel are less valuable, if more shipments are being inspected in the Red channel, as the report makes clear. No data were available on how inspections evolved past 2014.

¹⁴³ Two concerns are important to note. The ReSW study used to substantiate time and cost reductions in Rwanda is four years old. Second, the delay in the Kenya iCMS is important here, as the system will eventually be key to Northern Corridor Customs processing, but what was targeted in the RF was not realised during S1.

¹⁴⁴ When TMEA began working with national partners on this issue, the Northern Corridor countries had been working with a private model for electronic cargo tracking since 2011, but were dissatisfied with data quality and delays. TMEA's support helped the countries establish their own system (with Uganda first in 2016, then Kenya in early 2017, and Rwanda tying their system in with the RECTS in June 2017.) The chief benefit TMEA cited was that the connected system allowed for a transition from manual to automated, systematic risk management. Prior to risk management, according to a TMEA respondent, all trucks would have gone in convoy for protection.

elimination of the difficulties and slow pace of convoy transport, while also reducing risks to their consignments. Because of the more unitary nature of the indicator and the source of change, the probative value of evidence for this outcome is rated Virtually certain to have occurred, and to have been contributed to in large part by TMEA. Eliminating escorts would logically speed up transport of goods, as would the fewer interventions on transit shipments when under using a RECTS eSEAL. A 2018 report on RECTS performance shows that approximately 20% of all trucks in a given month used eSEALS, and that, at least in Uganda, e-monitored shipments took significantly less time than those not e-monitored¹⁴⁵ – although transit shipments would always pass through OSBPs more quickly, with or without eSEALS. Because of this ambiguity and the lack of clearer data on the time specifically saved by RECTS, this outcome is not considered for the time and cost key contribution claim for the component.

In the CT interviews, TMEA added an outcome-level indicator on reduced trade cost, which is corroborated by the SWIFTs evaluation for those projects which reports an 86% reduction against a target of 80% (though the target and the indicator do not appear in the RF), yet there are no data on cost reductions as a result of the CMS, RECTS or AEOs. An association representing Uganda’s largest export reported a 15% cost reduction on certificates, including certificates of origin. A firm from another value chain in Uganda reported that the trade costs reduced enough for them to decrease the amount of working capital on hand. As we do not have data on the other initiatives, however, the PE cannot confirm the amount of these cost reductions across the component. TMEA also claimed impacts in terms of an increase in trade, backed by URA export trade volumes data from the Busia border. Evidence on import figures from the Port Charter Dashboard was unavailable on multiple dates; the site returned the message “Website under development”. No data were available tying TMEA to any increases, and so the PE does not confirm that TMEA has made impacts on trade.

3.4.6.1 Conclusions

The evidence suggests that TMEA’s contribution claim of time and cost savings resulting from ICT4T interventions. It is ‘Very likely’ that the claimed outcome was realised, and that TMEA was central to the outcome.

Table 21: Conclusion: ICT for Trade

Outcome	Evidence of the outcomes, and probative value assigned	Evidence TMEA contributed to the outcomes, and probative value assigned
Reduction in trade time	<p>Very likely</p> <p>Average times are imprecise across 45 different systems.</p> <ul style="list-style-type: none"> External interviews strongly confirm the savings in time and a Ugandan firm said average time better by half. TMEA SWIFTs Formative Evaluation reports reduction from 86 to 10 hours or 89% (against 80% target.) TFDA SWIFT Report: 98% reduction in time to acquire permits, licences, or certificates, from average 135 hours to less than 2 hours. 	<p>Very likely</p> <p>Evaluation interviews say TMEA’s responsibilities in delivering these systems were distinct from those of other development partners.</p>
Reduction in trade costs	<p>Very likely</p> <p>Interviews strongly confirm cost reductions, such as 15% reduction in costs on certificates of origin; labour costs; average costs per transaction (SWIFTs evaluation) from US\$58 to US\$8 (86% against target of 80%) contributing to estimated savings of US\$9m over the life of the project. One Kenyan exporter said costs had remained constant.</p>	<p>Very likely</p> <p>Evaluation interviews say TMEA’s responsibilities in delivering these systems were distinct from those of other development partners</p>

¹⁴⁵ Kenya Revenue Authority, Rwanda Revenue Authority, Uganda Revenue Authority. 2018. Regional Electronic Cargo Tracking System (RECTS). Half Year July-December 2018 Report. TMEA.

3.4.7 CT Case Study: Elimination of NTBs

NTBs constrain regional trade and integration in East Africa, accounting for a significant proportion of high trade costs in the EAC. They drive up business costs of importing and exporting goods, make business regionally and globally uncompetitive, and increase prices to consumers across the entire region. In S1 TMEA partnered with the EAC Secretariat, Partner States, the private sector, and civil society to eliminate NTBs.

TMEA's projects in this component included:

- Supporting National Monitoring Committees (NMCs) with technical assistance and facilitating meetings at the national and regional level
- Supporting the use of bilateral channels to resolve given NTBs
- Putting in place SMS/Online based NTB reporting at the national level
- Supporting a Tripartite Online NTB reporting system in concert with the AfDB
- Drafting and reviewing the EAC NTBs Act

More information on each of these, including country-specific systems, can be found in Annex J in the chapter on PIO 2.3, and in Annex N in the CT Case Study data tables (with additional narrative on the country projects, as well as specific data and sources) and summary table.

The key contribution claim that forms the focus for the evaluation under this PIO is:

TMEA contributed to easing trading across borders by eliminating NTBs, which decreased average time and cost to transit.

Documents from TMEA country offices and HQ provide wide support of their **activities**: these included budgets, membership lists and reports from NMC meetings and regional fora; ToRs for an EAC impact study on a legally binding enforcement mechanism and an accompanying report; NMC work plans and activity reports; national strategies; the Time-Bound Matrix (TBM) and a report on long-standing NTBs; monthly reports on Tripartite NTB technical assistance; regional NTB forum reports; an external evaluation of the NTBs component (commissioned by TMEA but carried out by a contracting firm); and a manual for the use of the online reporting mechanism in one country.

Outputs include the development and operationalisation of NTBs reporting and monitoring systems, research and position papers, operational NMCs, and the passage of the NTBs bill, as shown in Table 22 below:

Table 22: CT Case Study: Elimination of NTBs

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
NTB monitoring/report systems developed; operationalisation support	<i>Virtually certain</i> Evidence: interviews with national partners; TMEA formative evaluation; some industry associations report use; others say there are challenges for their users; country programme work reports (no SMS in Rwanda)	<i>Virtually certain</i> Evidence: confirmation of TMEA's role from implementers, traders, industry associations, NCTTCA; system activity reported to TMEA by implementers
Research/position papers developed and published	<i>Very likely</i> Evidence: 21 papers cited in RF; four of these were reviewed by the evaluation team. No evidence of publication.	<i>Virtually certain</i> Evidence: products refer to TMEA and/or were conducted by NMCs with TMEA support
Regional and national NMCs operational	<i>Virtually certain (S1)</i> Evidence: reports from NMCs; industry apex body report cites NMCs; interviews, including an association respondent cites multiple levels of meetings	<i>Virtually certain</i> Evidence: NMC reports; interviews tie NMCs to TMEA support: transporters, women's association.
NTB Act passed	<i>Virtually certain</i> Evidence: EAC confirms passage and ratification; documents on drafting and legislative processes; industry note ratification (2018) without regulations	<i>Very likely</i> Evidence: TMEA reports, drafts, and recommendations; interviewees report that political will limited national uptake

Through re-creating a ToC for this component (please see Annex J), the PE team identified the three bold outputs above as critical for the results chain and leading specifically to outcomes of time and cost savings for users. TMEA's role in the outputs was confirmed by NMC members, private sector apex bodies and a CSO,

along with extensive reporting: ToRs, minutes from NTBs Act drafting sessions, and others. The indicator on position papers could not be linked with outcome gains. The PE team has high confidence in the data provided at the outputs level, and when taken together, they serve to increase confidence in the results chain leading to the key contribution claim. The evidence suggests that it is ‘Virtually certain’ that the outputs were delivered and that TMEA caused or contributed to them.

TMEA reported eliminating 116 NTBs in the RF, supported by the formative evaluation in which 87 had been resolved by 2016.¹⁴⁶ However, the indicator specifies ‘high-priority NTBs’, and has a denominator: ‘against the total number of NTBs reported as outstanding’ – but neither priority nor the denominator are included in TMEA’s RF reporting. Each eliminated NTB would have had an effect, reducing transit time for affected goods, but the number alone gives us no notion of the scale or importance of those removed. Weighbridges and checkpoints were identified as priority NTBs in a 2015 study,¹⁴⁷ and were most often cited by respondents as contributing to reduced transport times. But these total no more than a handful of the 116 total removed. Respondents also reported ‘more NTBs now [2019] than before’. An apex body supported in evidence-based advocacy reported that all partner states continue to apply NTBs in all sectors and types: ‘phyto-sanitary measures, technical barriers to trade, rules of origin, and cumbersome customs documentation’.

NTBs increased in the five EAC countries from 2014 to 2016 according to the Common Market Scorecard. Kenya’s NTBs more than doubled (from 10 to 23) and Tanzania’s more than tripled (from 7 to 24); about half of new 2014-2016 NTBs reflected charges ‘equivalent to the tariffs that had been removed as part of the CMP [Common Market Protocol] commitments’.¹⁴⁸ While TMEA supported additional NTB eliminations up to the end of S1, the acceleration of their generation and the uncertainty about the value of those eliminated in terms of time or costs are critical blind spots.

The evaluation team notes the absence of an effort to amend the NTBs Act to enforce consequences and remediation for NTBs, but this was not part of TMEA’s work plan. When countries complain of a new NTB and raise this concern to the EAC level, dialogue can help to resolve the issue – as happened with the NMCs – but there is no legal recourse through the EAC or its bodies, nor a mechanism that would sanction those countries that impose new barriers or fail to eliminate existing ones.

3.4.7.1 Conclusions

Although there is strong data that TMEA’s work contributed to the elimination of a number of NTBs, the number of NTBs eliminated is insufficient as a standalone outcome that would contribute to ease of trading across borders (though with the ‘high priority’ standard and the outstanding NTBs denominator in the original indicator might have been sufficient), and the costs or time saved as a result cannot be quantified. The key contribution claim therefore cannot be substantiated.

Table 23: Conclusion: Elimination of NTBs

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Number of High Priority NTBs eliminated (by country) against the total number of NTBs still reported as outstanding	<p><i>Likely</i></p> <ul style="list-style-type: none"> Formative Evaluation reports significant progress in identifying and resolving NTBs in the programme Traders were happy with removal of roadblocks. Multiple press reports, logistics firm, apex industry body, and Common Market Scorecard document report little progress on NTBs 	<p><i>Very likely</i></p> <p>TMEA support to NMCs and SMS are well-documented, but no outcome is found.</p>

3.4.8 CT Case Study: Harmonisation of Standards

PIO 2.4 was designed to improve Standards Quality Metrology and Testing (SQMT) infrastructure in all EAC Partner States at national and regional levels. Regionally, the component undertook a major effort to harmonise standards for the key goods in the region, and to develop and implement harmonisation procedures that Partner States had agreed upon. TMEA commissioned a study to select the top twenty most traded goods in the region, which was conducted by the EABC. TMEA then sponsored a process by which EAC countries could participate in the development of procedures to harmonise standards; when consensus was reached, TMEA then convened a series of technical sectoral committee meetings using these procedures and designed to focus on safety and health. Proposed standards were circulated for review and, when finalised, gazetted by the EAC Secretariat

¹⁴⁶ Law and Development Partnership. 2016. Evaluation Report: Formative Evaluation of TMEA Projects on Non-Tariff Barriers to Trade. 17 February 2016. TMEA

¹⁴⁷ Imani Development. 2015. East African Business Council (EABC) Final Report. 14 May 2015. TMEA

¹⁴⁸ International Finance Corporation. 2017. East African Common Market Scorecard 2016. Tracking EAC Compliance in the Movement of Capital, Services and Goods.

organs. Most of a list of 196 standards had completed the process at this writing. During PE fieldwork, the EAC was examining the rate of adoption of the harmonised standards – and their mutual recognition at borders – compared to a baseline exercise from 2013, which showed that country compliance at borders in allowing products using the harmonised standards to enter per the law varied greatly; compliance with the East African Standards (EAS) ranged from 26% in Tanzania to 86% in Burundi, while Rwanda complied with 40%, and Kenya and Uganda over half.¹⁴⁹ Only 18 EAS had been adopted by all the partner states, out of 359. Another study was underway at the time of this writing to check on compliance in 2019.

At country level, TMEA invested with national standards bureaux to draft legislation and technical regulations; identify and fill priority gaps in equipment and training; ensure border posts had the requisite equipment and trained staff to speed up processes; and conduct outreach on standards with the private sector. Details on these, including country-specific data, are found in the Standards PIO chapter of Annex J, and in Annex N in the CT Case Study data tables (with project narrative, wider data, and sources) and summary table.

The key contribution claim that forms the focus for the evaluation under this PIO is:

TMEA contributed to the ease of trading across borders by harmonising regional standards and by increasing the capacity and effectiveness of national bureaux of standards.

Evidence from TMEA country offices and HQ confirm that their **activities** were delivered; at regional level these included the EABC study on the twenty most traded goods; minutes from the procedure-setting session, and the resulting procedures; PARs; and documents from a technical working group. At national level TMEA provided procurement and training information, draft legislation and regulations, and M&E and project reports.

Outputs include the upgraded Standards Bureaux and trained staff; work on key legislation (Kenya only); and sensitisation of private sector stakeholders on standards, as shown in the table below:

Table 24: CT Case Study: Harmonisation of Standards

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
National Bureaus of Standards testing upgraded and staff trained	<i>Virtually certain</i> Evidence: site visits, including to labs, and partner interviews; training reports; PARs; reports on testing at central and border locations	<i>Virtually certain</i> Evidence: MoUs, contracts, procurement docs; partner reports to TMEA; PARs; partner interviews
Kenya SQMT Policy, technical regulations; review Standards Act	<i>Virtually certain</i> Evidence: Interviews with TMEA staff; draft bills created; interviews with TMEA and partners on the as-yet incomplete legislative process	<i>Virtually certain</i> Evidence: TMEA contracts and contractor reports for drafting legal documents
Stakeholder sensitisation activities /workshops on product standards	<i>Virtually certain</i> Evidence: regional Standards Survey baseline report; Rwanda twinning project report; Kenya workshop details and documentation; Uganda report on sensitisation workshops	<i>Virtually certain</i> Evidence: regional and country office TMEA reports; interviews confirming TMEA role

Through re-creating a ToC for this component (please see Annex J), the PE team identified the first output, on upgrading testing facilities and training staff, as critical for the results chain leading specifically to the key contribution claim on easing trade across borders, through increasing standards bureau capacity and efficiency. TMEA's role in this output was corroborated through extensive documentary data on the procurement of new equipment and training in its use, in each country; evaluation site visits, documentary evidence and interviews corroborated the outcome. The evidence supports a probability level of 'Virtually certain' that this output occurred and TMEA was responsible for it.

An output-level RF indicator for the standards work at regional level, on mutual recognition agreements, was null, as TMEA decided not to pursue these. This meant there was no output on how harmonising standards would lead to easing trade across borders. The other two (ancillary) outputs were not necessary for the causal mechanism towards the key contribution claim.

¹⁴⁹ Ayaah Enterprises Ltd., Julius Oboth and East African Business Council. 2013. Final Report for the Assessment of the Progress in the Implementation of the Adopted East African Standards and Effectiveness of Certification Schemes in EAC. December 2013.

For the key contribution claim to have been realised over the joint regional and national component, several pieces of data were available in the RF, with supporting evidence identified during the PE and a comprehensive TMEA-commissioned Formative Evaluation.¹⁵⁰

Table 25: Outcomes: Harmonisation of Standards

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Number of standards harmonised (and gazetted)	<i>Virtually certain</i> TMEA RF reports 196 standards harmonised; formative evaluation and EAC Gazette from 2016 confirmed 79 at that time; UNBS confirms participation in harmonisation processes.	<i>Virtually certain</i> TMEA activities evidence on harmonisation and gazetting; evaluation interviews with TMEA and EABC; Formative Evaluation; Technical committee report <ul style="list-style-type: none"> • However, no outcome is found without mutual recognition
Number of additional tests performed	<i>Unclear evidence</i> Additional tests data are inconsistent between countries. Evaluation interviews and some agency data confirm that new tests are being performed, but no figures.	<i>Very likely</i> HQ/border interviews, reports, formative evaluation confirm TMEA support; MoU with MinTrade
SMEs certified by Bureaux of Standards	<i>Likely for Rwanda and Uganda; Very unlikely for Kenya</i> Based on report and RF data as well as interviews with agency partners and beneficiaries	<i>Virtually certain for Rwanda; Unlikely for Kenya and Uganda</i> Project reports to TMEA; Lists of certified SMEs reported; evaluation interviews
Reduction in time to test and issue certificates for selected goods for intra-regional export	<i>Unclear evidence</i> RF, Formative Evaluation, evaluation interviews, and bureau reports to TMEA; but data do not meet indicator criteria and represent 'lab times' rather than OSBP times.	<i>Likely</i> Evaluation interviews with partners (KEBS, UNBS, RSB) confirm link to TMEA-supported equipment and training, as does Formative Evaluation for all three countries.
Average reduction in cost of testing	<i>Very likely</i> RF, Formative Evaluation, evaluation interviews and bureau reports – average reduction in cost of testing in important parameters from \$500 to \$250	<i>Very likely</i> Formative evaluation reports on average cost. Reports to TMEA and evaluation interviews.

That there was an increase in the total number of harmonised product standards is strongly supported by TMEA documentation, EAC gazetting of the harmonised standards, and partner reports. Interviews and national-level documents confirm the role played by TMEA to bring public and private national actors together to propose standards at the regional level. Rwanda, Kenya, and Uganda reported additional testing (at both central and border sites) using TMEA-supplied equipment. Testing time was reported to be reduced because of the new equipment and training, according to interviews, reports, and the Formative Evaluation. Interviews with partners about their other donor programmes confirmed that although such projects exist, they were not directly responsible for new equipment or training that would have reduced testing time.

The 2006 EAC Standardisation, Quality Assurance, Metrology and Testing (SQMT) Act, Section 24(2), requires: "Partner States shall recognise as equal to their own, certification marks awarded by national quality system institutions of other Partner States provided that which the administrative provisions with control the use of the marks meet the obligations in this section."¹⁵¹ EAC Partner States have adopted this Act and should, therefore, comply with its mandates around accepting goods with these certification marks that would be applied when goods are tested in the EAC and found to be in compliance with harmonised EAC standards. At the same time, this was not actively and repeatedly measured or verified during S1, by the EAC or by TMEA. The EAC did find in 2015 that Rwanda and Uganda were in compliance, but other EAC Partner States were not complying at that time. The PE team noted that the absence of targeted efforts to ensure national bureaux and their border staff respected the regionally harmonised standards was a critical gap. At outcome level, there ought to have been an indicator designed to report on the degree of mutual respect for the new standards at borders. The harmonised standards were an important policy-level gain but without these types of interventions and data, there is no way to know whether compliance had improved for more goods in more instances, which would show the ease of trading across borders.

There are important evidence gaps for the national level projects as well. RF data on the number of additional tests performed by standards bureaux are not systematic. The PE team pursued these data repeatedly with TMEA and directly with partners, but over and over, partners provided reports that were deeply flawed – no baselines or trendlines pre-and post-upgrades, no differentiation between types of tests, no data reflecting the

¹⁵⁰ AYAAH ENTERPRISES. 2015. The formative evaluation of the standards harmonization and conformity testing programme. Final draft report. August 2015.

¹⁵¹ EAC. 2006. EAC Secretariat. 2006. The East African Community Standardisation, Quality Assurance, Metrology and Testing Act. TMEA.

improvements in detection (based on more sensitive equipment), no disaggregation for tests done at the capital city laboratory versus in mobile labs at borders, no staff numbers for those trained outside the capital, and other gaps. To substantiate the participation of upgraded standards services in reduced border crossing times, we requested data on how long it took to inspect consignments at border posts, as well as data on reduced charges to traders. Instead, we received reduced lab testing times and reduced lab testing costs. There is no way to know from the data whether these reduced costs were passed on to traders, and since testing is a revenue source for these bureaux, there is a need for evidence of the actual change.

Since RF targets were unclear, the level of achievement of additional tests against targets is also not known. Across the region, there is certainly additional test capacity but how many, and the strength of the RF evidence and new evidence gathered by the PE, vary by country. While tests in upgraded labs take less time to carry out as a result of new equipment and training, a result which is strongly evidenced in the Formative Evaluation, this does not automatically equal reduced testing time to cross borders. The latter relies on proper documentation of products arriving at borders, mutual recognition of the standards between partner states, and border officials' application of that mutual recognition.

According to the 2015 Formative Evaluation, TMEA had not yet begun to work on mutual recognition agreements (part of the TMEA programme design overall, that in the end was not carried out). The Formative Evaluation provided evidence on testing times that referenced a Notified Certification Mark (NCM) used by standards bureaux to signal to border personnel that the products met harmonised East African Standards (EAS). The study says that products 'with the NCM' went from multiple days to a half-day or less in five countries, Tanzania excepted when dealing with foods or drugs.¹⁵² However, NCMs are not documented in national or regional Standards project or component reports, nor were any indicators developed to monitor progress on either the certification of businesses with NCMs (with the exception of Rwanda, where very small numbers of businesses were given an S-Mark)¹⁵³ or to monitor whether those marks actually did result in mutual recognition at borders.

Another issue that would need to be clarified is how many businesses were now using such marks, compared to pre-intervention. Only a handful of businesses were reported to have achieved marks in one country's TMEA-supported project, and no reports in the other countries on this issue. The extent to which the new standards could have facilitated trade is directly tied to how often the new system of standards and marks is actually used. Combined with the evidence that recognition of EAS was monitored only once in 2013, showing great variance in compliance, the PE cannot substantiate this reported level of reduced testing time or related costs.

The time savings at OSBPs attributable to Standards support are not separated in the data: bureau respondents (HQ or border) report that testing times are down dramatically but the time to test may not be the same as the time from entry of a consignment for processing and its release. The full time would include at a minimum any waiting time prior to being attended by the Standards staff member, the time for the test, and the time for issuance of the certificate, as the indicator reflects. That time is not captured as yet but that is planned as part of an OSBP IT upgrade discussed for S2. Finally, the indicator specifies 'for selected goods for intra-regional export' but no selection is made, and the data reported are for different goods with unknown destinations.

Cost reductions are based on time saved and on costs saved in paying for tests. The 2015 Formative Evaluation of the Standards Harmonization and Conformity Testing Programme reported an average reduction across the three countries from US\$500 to US\$205, and ample detail about reduced costs by country and by test in its annexes.¹⁵⁴ In PE interviews and shared reports, Kenya reported reduced prices on aflatoxin rapid results at borders from approximately US\$50 to US\$20; Rwanda reported that not having to send tests abroad reduced costs but did not specify those costs, or any other savings. Reduced cost for testing procedures benefits traders but again the question of use arises: how many businesses benefited from the reduced costs, at what level of savings? The Formative Evaluation found no reduction in consumer prices on the harmonised goods that might have indicated that trader costs were coming down.

¹⁵² AYA AH ENTERPRISES. 2015. The formative evaluation of the standards harmonization and conformity testing programme. Final draft report. August 2015. P. 15

¹⁵³ The Rwanda Standards Board. 2018. Twinning support to the Rwanda standards board to strengthen quality infrastructure and facilitate Rwandan Business to export – phase 1b. (April 2015 – December 2017). End of project report. 30 January 2018. TMEA

¹⁵⁴ AYA AH ENTERPRISES. 2015. The formative evaluation of the standards harmonization and conformity testing programme. Final draft report. August 2015.

3.4.8.1 Conclusions

The key contribution claim of easing trading across borders as a result of the Standards interventions cannot be substantiated. Despite strong data that TMEA's work contributed to the harmonisation of standards, and supported reducing the costs of testing for traders, there is insufficient data from borders to determine the effect on time and cost reductions. The evaluation team note the lack of evidence to support a causal relationship, without inferring that there is no causal relationship.

Table 26: Conclusion: Harmonisation of Standards

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Number of standards harmonised (and gazetted)	<i>Virtually certain</i> TMEA RF reports 196 standards harmonised; formative evaluation and EAC Gazette from 2016 confirmed 79 at that time; UNBS confirms participation in harmonisation processes.	<i>Virtually certain</i> TMEA activity evidence on harmonisation and gazetting; evaluation interviews with TMEA and EABC; Formative Evaluation; Technical committee report However, no outcome is found without mutual recognition

DEQ2.3 To what extent has TMEA contributed to improving business competitiveness?

OPM's Effectiveness and Outcome-level Evaluation team scored SO3 projects well on effectiveness; no projects had major concerns at the level of outputs achieved, though most outputs were not achieved on schedule. SO3 projects supported business competitiveness, including technical assistance to support traders and organisational strengthening of civil society organisations and business associations. They have influenced the reporting of NTBs, come together in multi-industry advocacy platforms, and enabled SO1 and SO2 projects. Many of these projects have also struggled with internal capacity constraints. Most stakeholders reported that the projects had strong and successful capacity building elements and were achieving successful outcomes. But the TMEA 'canvas' for what constitutes a relevant project to support business competitiveness was very wide and the evaluation expressed concerns that TMEA could have greater influence and achievement if SO3 were to have a more narrow and strategic focus on export competitiveness.

3.4.9 CT Case Study: Export Capability

PIO 3.2 was designed to improve the competitiveness of high-value sectors both in regional and national markets, such as tea, horticultural products, coffee, and maize, with a focus on landlocked countries. The nature of the component meant working on several projects at the level of farmers' organisations around market-led approaches to improve business competitiveness, where TMEA report having a distinct comparative advantage. At this level, the scale of projects was generally small, and timelines were short as many of these were towards the end of S1. The contribution claim that forms the focus for the evaluation under this PIO is:

Through helping target sectors improve business competitiveness, TMEA contributed to increased export of those goods.

Key activities included market analysis; stakeholder committee discussions; sensitisation meetings and technical trainings on standards for farmers, trainers, and auditors; and exchange visits for SMEs and farmers' groups. Where standards were already in place and implemented, projects pursued market linkages through sales missions and capacity building on negotiating price for better grades. Details on these, including country-specific data, are found under PIO 3.2 in Annex J, and in Annex N in the CT Case Study data tables (with project narrative, wider data, and sources) and summary table.

Evidence from TMEA country offices, HQ and project actors support the finding that **activities** were delivered, though not all projects engaged in all of the activities, given the diversity of projects. Market analyses and marketing initiatives were conducted for some projects, as were sales missions. Some worked at the level of training farmers, trainers, and auditors to improve quality across bigger farmers' organisations. Again, the nature of these multiple, smaller projects meant that activities were not homogeneous. While it is therefore not possible to substantiate all activities cited in the CT case for all projects, TMEA provided some documentation on many projects and this was supplemented by evaluation interviews with partner organisations and (through the PGIS) with beneficiaries. As with other project groups in the TMEA portfolio, particularly in SO3, capacity varied among implementers.

Outputs included trained farmer groups, standards adopted at country and individual level, and increased collaboration between government and the private sector. Rwanda TMEA staff added an indicator on the creation of business plans for exports.

Table 27: CT Case Study: Export Capability

Output	Evidence of the outputs, and probative value assigned	Evidence TMEA caused the outputs, and probative value assigned
Farmer groups or companies (entities) trained on standards	<i>Virtually certain</i> Evidence: partner reports and evaluations; participant training satisfaction surveys; evaluation interviews with partners and beneficiaries	<i>Virtually certain</i> Evidence: partner and beneficiary interviews; TMEA reports and meeting minutes; partnership/grant agreements; media briefs on some projects
Farmers, groups, and countries adopt standards and good practices	<i>Virtually certain</i> Evidence: gazettement of sesame standards; bylaws and ordinances developed for some projects; evaluation interviews with project implementers	<i>Virtually certain</i> Evidence: partner and beneficiary interviews; numbers and PDFs of certificates
Collaboration between government and private sector increased	<i>Very likely</i> Evidence: stakeholder forum notes, approval processes, end of project reports and meeting notes; government participation in implementation from reports on particular cases around sanctions	<i>Very likely</i> Evidence: TMEA reports on market linkages
Supported business consultants assisted exporters w/ export business plans	<i>As likely as not</i> Evidence: evaluation of one large EC project reported externally of the capacity building of local business consultants for this purpose	<i>As likely as not</i> Evidence: partner interviews showing TMEA involvement

Through re-creating a ToC for this component (please see Annex J), the PE team identified the two **bold** outputs in Table 27 as critical for the results chain leading specifically to the contribution claim of increased exports – a critical goal for the Partner States as well. Interviews with partners also confirmed that other donors worked on agricultural value chains, but with other actors and on other aspects of programming. Project respondents confirmed TMEA's support was unique for their value chains.

While these outputs were found to be achieved for some projects, they were not needed in others; one challenge with the EC component was the wide diversity among the projects, making indicators especially difficult. The number of groups or companies trained on commodity standards and export capability, resulting in increased awareness and understanding of standards, is found in the RF. However, RF data are unclear: some countries reported individual farmers and some reported entities trained. The PE team reviewed end of project reports, project monitoring plans, project close-out reports and interviewed project actors. Data from PGIS field visits to some projects also confirm trainings and TMEA's role in them.

The adoption of good practices was supported by interviews with project participants as part of the PGIS, and by project reports and interviews with implementers. In terms of the adoption of standards – which was not part of all projects – there is evidence of the gazettement of a sesame standard and WTO's announcement of Uganda's new standard, as well as bylaws and ordinances where these were adopted locally, that provide confidence in the outputs for those projects.

However, the RF data are unclear, making the actual figure of number of groups trained or adopting good practices uncertain, so the scale of the outputs is difficult to determine. And, obviously, where projects did not require training in standards, they are not captured in the RF or in this case study.

The evidence confirms that it is 'Virtually certain' farmers groups (or cooperatives or companies) were trained by the project, and that TMEA was responsible for the training. Across farm value chain projects, standards or good practices adoption was 'Likely', though TMEA's contribution to those goals was 'Virtually certain' – more data collection was necessary to substantiate the ongoing use of good practices and standards.

Collaboration between government and private sector and the assistance in creating business plans were not deemed necessary for the increase in exports to have taken place. As such these have been deemed ancillary and not considered as part of the results chain for the overall EC case study.

For the key contribution claim, several pieces of data were available in the TMEA RF.

Table 28: Outcomes: Export capability

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Increase in export revenue for entities supported	Likely Partner data on export volume, value, and quality (but with unclear targets) <ul style="list-style-type: none"> Rwanda tea increased average 0.15% and about a third for certified producers Traidlinks: larger companies increased exports. Export value up 36% and 24% in two Kenya sites. Uganda maize farm prices from 400 to 1600 Ush 	Very likely Evidence on inputs/outputs above confirming TMEA involvement
Entities certified	Likely Traidlinks case and factsheet; export project evaluation; Partner databases, project monitoring plans	Very likely TMEA case studies on beneficiaries' perspectives; evaluation interviews
Increase in the number of people employed in the sector	Likely Formative evaluation and case studies on one programme cites 38 full time jobs; coffee projects say 1,247 direct and indirect jobs (though not all permanent). No data from other partners.	Likely TMEA was the only project that supported FPEAK and EATTA during the lifetime of the project; this is not claimed for other partners
Improved access to markets, and renewed access	Likely FPEAK farmers trained and EU notifications decreased. 140 farmer groups accessed new markets for French beans. 13 of 16 Traidlinks companies exported. Project data on exports (volumes, exporters, buyers, crop)	As likely as not FPEAK report to TMEA and evaluation interview; lacking data from most projects on TMEA project success in contracts with buyers
Reduction in rejections of the goods exported	Very likely Records show decrease in rejections from export markets; project evaluations. Tea, maize.	Very likely Evaluation interviews with Ministry of Trade and Agriculture, FPEAK and EATTA
Trading standards implemented	Likely interviews confirm meeting standards for vegetables, meat and dairy, honey. RF shows 37 entities in Rwanda.	As likely as not Limited evidence has been shared on standards being implemented
Improved internal business practises of companies	Very likely Partner field notes and training manual. Baseline collected. Rwanda trained advisors for business planning. PGIS respondents reported learning: prudence, savings, reinvestment, standards, customer engagement and business diversification.	Very likely PGIS and PE interviews with TMEA team, growers, associations, buyers, those knowledgeable on pricing

TMEA claimed an increase in export revenues for the entities supported. FPEAK data show French beans exports increased in value by 36% and 24% from two project sites. Tea brokers reported better prices and profits, and a final evaluation of another project¹⁵⁵ showed increased export values in Rwanda. In PGIS data, some women entrepreneurs cited export increases, but others noted increased input prices, competition, inflation, and taxes as well.

TMEA also claimed increased employment in supported sectors and value chains, backed by their Formative Programme Evaluation and case studies. These changes are not well documented by partner organisations and no further data were offered around these outcomes. Country programmes reported 175 farmer groups accessing new markets. A TMEA-commissioned evaluation report validated some market linkages: 13 of 16 companies supported were exporting to EAC countries in one project. In another, out of 26 companies, 19 exported either to the DRC or Uganda. TMEA case studies in Rwanda, however, state that despite improved export performance, results fell short of expectations.

Reductions in rejection of goods were well-documented for some projects. In Uganda, the percentage of buyers rejecting maize produced by Masindi, Lira and Nakaseke farmers dropped from around 70% in 2015 to 11%, 15%, and 40% in 2016. Rejections of tea at auction went from four cases to one in two years, and buyers praised consistency, but UNIDO also participated at that time, making contribution unclear for this indicator on that project.

RF data are uneven on whether project participants adhered to the standards they had learned about in the projects. Uganda reported individual farmers rather than entities implementing training standards. Rwanda reported 37 entities, and at the corporate level, an unclear data set appears to indicate a total of 74 entities. Interview data from Rwanda confirm TMEA support to government enabled the private sector to meet regional and EU trading standards in honey, vegetables, meat, and dairy products, to name a few. RF data were also

¹⁵⁵ AYAAN ENTERPRISES Ltd. 2016. The Export Capability Programme (Rwanda and Burundi): Final Draft Evaluation report

unclear on certification. Some 748 farmers became EAGAP compliant in the FPEAK project, and 429 farmers received GlobalGAP certification. Project staff and partners note that when participants did not certify – sometimes part of the population served, and other times all of it – this was due to high costs and demands of certification, and uncertainty around the markets for their products.

TMEA respondents also noted that a programme focus was to improve companies' internal business practices, though no data supported this assertion widely. In PGIS visits, these improvements were prevalent in respondents' comments, from general references to prudence and savings, to specific skill sets such as capital reinvestment, considering standards like Q-mark and S-mark (Uganda), customer engagement and business diversification.

Across these outcome indicators, five (in **bold** above) were considered important to the key contribution claim of increased export. These were increase in export revenue, improved access or re-access to markets, reduction in the rejection of goods, trading standards implemented, and entities certified. However, as noted above, not all projects in the component reported on these indicators; the variety within the component makes the calculation of the key contribution claim difficult. Certification may not be necessary if standards meet buyers' needs, for example. Job growth would not necessarily lead to gains in exports. Improved business practices may be necessary for one cooperative and not for another, depending on what is meant by business practices. The indicators likeliest to support the key contribution claim are reduction in rejections, increased access to markets, and increased export revenue. These are listed below, and some data are listed for each country (Tanzania did not provide data on these indicators).

Table 29: CT Case Study: Indicator data

	Kenya	Rwanda	Uganda
Increase in export revenue on TMEA-supported interventions	Tea: ~33% average gain Horticultural: 24-36% gain	Contributed to strong gains in national exports	Maize: 300% Maize flour: 500%
Improved (re)access to new markets	FPEAK: 140 farmer groups with 3,557 farmers accessing new markets	13 of 16 participating groups exported to EAC; RF cites US \$1m in sales	
Reduction in rejections of the goods exported	Tea rejection dropped from 4 cases to 1 case	Unquantified in report but cited award-winning tea	Reductions differed by region but prominent improvement

3.4.9.1 Conclusions

While these results are positive, they are not systematic across the TMEA projects. The CT method is less useful for the EC case as a case because of the heterogeneity of the projects and the insufficiency of indicators. Though increasing exports was a shared goal across the projects, the method of arriving at that goal differed, and data around actual increase in exports were not available across projects. Despite promising projects with experiences that may be useful for future programming (as described in Annex J), the key contribution claim cannot be substantiated.

Table 30: Conclusion: Export capability

Outcome	Evidence of the outcome, and probative value assigned	Evidence TMEA contributed to the outcome, and probative value assigned
Increase in exports	Likely Some export values improved in Kenya, Rwanda, and Uganda; increased access in some projects in Kenya and Rwanda; rejections down in three countries. However, there is no steady baseline against which to measure increased exports across the component	Virtually certain Project reports to TMEA and TMEA was reported to be the only organisation working with some of the projects

DEQ2.4 Has TMEA caused any unintended outcomes? What are they and who has been affected?

The PE team found very few unintended outcomes among beneficiaries, partners and TMEA responses to the evaluation interviews. Where these were found, they were generally anecdotal, rather than systematic.

At the government level, GoK formed Parliamentary and cabinet committees to support and institutionalise trade intervention gains – an outcome TMEA had not foreseen or worked towards, specifically. One issue that was unanticipated was that of the political vacuum around the advent of the SGR. TMEA’s opportunistic approach allowed them to engage with the GoK on this issue and commission a report on the technical and commercial options for integrating SGR into the corridor linking Mombasa Port to Nairobi. This report was not, technically speaking, an unintended outcome – but it does exemplify how TMEA could take advantage of emerging opportunities to engage in the sector and proactively use their connections and influence.

International research and the press reported job losses at OSBPs among clearing agents and manual laborers, such as those who carried goods over the border, and increases in vulnerability among these people.^{156,157,158,159} There was new evidence of smuggling zones^{160,161,162} also reported by an EAC ministry staffer; uneven pricing that might indicate that goods are not crossing duty-free as the SCT would demand;¹⁶³ and the use of children and people living with disabilities to cross without border checks.^{164,165} People living with disabilities were seen crossing the border with small amounts of goods at Busia during the PGIS¹⁶⁶ data collection, but no evidence linked this to TMEA’s interventions. However, the team did not visit smuggling zones, nor did they see any border officials denying the use of the STR to informal cross-border traders. The team also did not identify any former clearing agents or manual laborers for interviews; it stands to reason that those who were unemployed would no longer be readily available at the border posts. At least one OSBP border area was widely reported in the press to have continued to have significant illegal market activity, where goods whose prices differed greatly from one side of the border to the other – like charcoal and beer – remained actively smuggled.^{167, 168}

TMEA staff reported positive unintended outcomes at border posts, including population and business growth including petrol stations, construction workshops and shops. TMEA reported having access to satellite imagery at Busia showing greatly increased illumination before and after the OSBP was installed, which would have helped to substantiate this claim, but despite repeated requests the pictures were not shared. The OSBP dispensary supported local communities in at least two OSBPs, and introduced HIV testing; in one the flow of people crossing the borders was quite low and no effects were seen, though staff reported the dispensary in regular use even for nearby communities. In another, a handful of PGIS respondents reported the availability of health services if they were needed, but the level of uptake was not recorded.

TMEA staff in another country reported growing markets for raw materials such as sand and stones, and for food and accommodation; new hotels and restaurants, bars, transport businesses, financial services and markets; upgrades to power lines; reduction in prostitution; and an influx of construction workers from other countries to meet labour demand. The PGIS found no evidence of increase in formal employment, or decrease in unemployment, caused by trade in Uganda, Rwanda or Tanzania, but a slight decrease in unemployment in

¹⁵⁶ Daily Nation. 2018. Busia open border reduces cost of doing business, leaves losers sulking, in The Daily Nation, Feb 23, 2018.

¹⁵⁷ Sanaa Consulting. 2015. A Study to support the development of TMEA-supported Programmes on Cross-border Trade that are more Responsive to Gender.

¹⁵⁸ Odanga, Ignatius. 2018. Busia one-stop border post renders hundreds jobless, in The Standard Digital, April 7, 2018. Available at: <https://www.standardmedia.co.ke/article/2001275976/busia-one-stop-border-post-renders-hundreds-jobless>

¹⁵⁹ Tyson, Judith E. 2015. Effect of Sub-Saharan African trade corridors on vulnerable groups. Overseas Development Institute. Available at: <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/10136.pdf>

¹⁶⁰ PPU Reporter. 2019. Traders to reap big as Kenya, Uganda sign pacts, Office of the President of Uganda. Reproduced at: <https://www.trademarka.com/news/kenya-news/traders-to-reap-big-as-uganda-kenya-sign-pacts/>

¹⁶¹ Radoli, Musa. 2018. Cross-border charcoal trade booms in Busia, in People Daily, July 20, 2018. Available at: <http://www.mediamaxnetwork.co.ke/452487/cross-border-charcoal-trade-booms-in-busia/>

¹⁶² Mondoh, John. 2016. Close down border markets, Kenya-Uganda officials say, in The Standard Digital, July 31, 2016. Available at: <https://www.standardmedia.co.ke/article/2000210420/close-down-border-markets-kenya-uganda-officials-say>

¹⁶³ Obonyo, Oscar. 2015. Wine, women and song lure thousands of Kenyans to Uganda, in The Standard Digital, July 12, 2015. Available at: <https://www.standardmedia.co.ke/article/2000168934/wine-women-and-song-lure-thousands-of-kenyans-to-uganda>

¹⁶⁴ kbf. 2018. How crafty traders use children and disabled to evade tax at the borders, Standard, December 29, 2018. Available at: <https://www.standardmedia.co.ke/article/2001307761/how-crafty-traders-use-children-and-disabled-to-evade-tax-at-the-borders>

¹⁶⁵ Economist (uncredited). 2018. Informal trade is ubiquitous in Africa, but too often ignored. In The Economist, September 1st, 2018. Available at: <https://www.economist.com/finance-and-economics/2018/09/01/informal-trade-is-ubiquitous-in-africa-but-too-often-ignored>

¹⁶⁶ Allison, C. Culver, K. & Silva-Leander, S. (2019). Deliverable 5B: Poverty and Gender Impact Study, Draft Report. OPM: May

¹⁶⁷ Radoli, Musa. 2018. Cross-border charcoal trade booms in Busia. In People Daily, July 20, 2018. Available at: <http://www.mediamaxnetwork.co.ke/452487/cross-border-charcoal-trade-booms-in-busia/>

¹⁶⁸ Economist (uncredited). 2018. Informal trade is ubiquitous in Africa, but too often ignored. In The Economist, September 1st, 2018. Available at: <https://www.economist.com/finance-and-economics/2018/09/01/informal-trade-is-ubiquitous-in-africa-but-too-often-ignored>

Kenya on the trade corridor.¹⁶⁹ However, important shifts from formal to informal employment were seen in Kenya and Uganda, which would tend to rebut the reports of increased business, who would need to hire workers. Qualitative data from interviews and focus groups in the PGIS also supported the notion that efficiencies have reduced labour demand and forced workers to have more than one (most often informal) job. Respondents' impressions were of a general contraction in employment, particularly among poorer respondents' disaggregated comments.

As part of TMEA's rehabilitation of container storage space at Mombasa Port, it was able to leverage KPA's purchase of cranes to make container handling more efficient in that space. Together, the two investments increased port capacity in a way that neither would have done alone and in a way unforeseen by the ToC. Indeed, TMEA does not explicitly assume any benefits due to synergies in its ToC. Also at Mombasa Port, the expanded Port Reitz road (in concert with Kenya National Highways Authority – KeNHA) justified in terms of decongesting port access also created a fast link Mombasa's Moi international airport, resulting in time savings, facilitating tourism growth, enhancing property values along expanded roads, improving storm-water drainage, and reducing vehicular emissions due faster average traffic speeds.

In Rwanda, Kenya and Uganda there was evidence of increased income on the trade corridor, and among households where the breadwinner works in a tradeable sector.¹⁷⁰ In focus groups, poorer respondents tended to refute that evidence while wealthier respondents tended to corroborate the gains. PGIS data overall showed that income is an important channel through which trade might affect poverty, though these gains alone do not sufficiently substantiate reports of increased business growth at Busia.

TMEA staff also reported that automation adversely affected rent seekers, such that opportunities for corruption were reduced – which was a fully intended outcome, though not specified in the RF or ToC explicitly. ICT4T integration of CMS or creation of Single Windows reduces the number of times a trader interfaces with trade agencies, where bribes could be expected. Reducing corruption is more difficult than simply removing opportunities, but these projects were an important step towards making it more difficult. Government partners in one country said the AEO programme had had unexpected effects on transparent dealings among beneficiaries: two AEOs declared errors they had made in internal documents and paid more to URA, and some clearing agents had turned down risky business that might compromise their AEO status.

SO3 project respondents reported a set of small unintended outcomes. First, there was peer-to-peer training among farmers and cooperatives in export capability projects where that had not been planned; among women and trade projects, there were reports of women organising themselves into cooperatives in order to be able to participate, and of increased participation growing out of the demonstration effect of the women's success. As a corollary to their increased income, some women reported improved relationships at home and sometimes resulted in their husbands giving them more land to farm or being more supportive in general. While certification outcomes were less frequent than planned, for reasons explained in the section on export capability, at least some co-operatives in a horticultural project found domestic buyers for their goods. Another group pooled funds to set up their own processing facility, increased volume, and adequately satisfied demand in new markets – but these are likely one-off outcomes, not at the system level.

Overall, the evaluation found little evidence of unintended outcomes that were well-substantiated or systemic. The most frequent claim was around job loss among unskilled workers and clearing agents at OSBPs, particularly Busia, but accurately estimating the scale of the problem was beyond the scope of this evaluation. People living with disabilities being used to cross borders with goods was substantiated by the PGIS team and press reports. However, there was no evidence that linked this to TMEA's interventions. Claims of increased business and population around OSBPs were not substantiated.

¹⁶⁹ Quantitative research in the PGIS is based on national household panel surveys for Tanzania, Uganda, Kenya and Rwanda, that pre-date the end of S1. The data therefore cannot show TMEA impacts but were used to examine whether trade itself was correlated to higher employment or wages, lower prices, or increased government expenditures on pro-poor initiatives.

¹⁷⁰ Please see the PGIS for details on sectors and corridors, and how these were determined from the household data.

3.5 Gender in TMEA

As in many parts of the world, East African governments often have gender-sensitive policies but implementation and cultural acceptance of the equality of women in economic, political, and social contexts lag behind those goals. In trade, the international community studies the needs of women informal cross-border traders¹⁷¹ and has worked towards system-level changes, as at border posts. These traders face higher transaction costs and risks of harassment and gender-based violence. They profit at narrow margins, if at all. More broadly, many areas of trade are male dominated, such as in the logistics industry, Customs and other agency staff at borders, and port operations.

Poor people across the region affect and are affected by trade, whether at border posts or elsewhere. Women's traditional role as primary caregivers and their reduced earning potential make them and their children particularly vulnerable to trade shifts. Informality is the greater part of the economy in much of East Africa and increases risk of being negatively affected by changes in trade, such as increased competition from cheaper imports. While poor people may benefit from lower market prices increased trade can bring, these may be offset by reduced earnings and employment.¹⁷² Research is also weak on when reductions in transport costs – targeted by many Aid for Trade interventions – are reliably passed on to consumers. The poor and, particularly, the 'very poor' have quite different needs for becoming economically empowered to move from subsistence-level businesses to more formality and stability. They often do not share the business-building patterns of better-off entrepreneurs.¹⁷³

While the PE did not focus on gender in its evaluation questions, the importance of gender to trade outcomes and to donors, and the useful findings about gender in interventions and the TMEA organisational culture, warranted the inclusion of an additional section in this report. Greater detail can be found on the Women and Trade Programme in Annex J where the full component is discussed, and in the OPM PGIS which focuses on poverty and gender. This section examines the strategic thinking behind TMEA's gender-focused activities, describes the context for gender in Aid for Trade programming, and looks at the relevance, effectiveness, and impact of the work undertaken in S1.

Donor priorities on gender are reflected in TMEA's S1 strategic thinking and implementation. TMEA carried out a gender scoping study in 2011 resulting in its 2012 Gender Policy¹⁷⁴. This proposed four key areas of work for TMEA: gender analysis and action planning, building staff capacity, holding partners accountable to TMEA's and partners' own policies, and promoting a gender-sensitive organisational culture within TMEA and with its partners. The policy proposed the development of an implementation strategy and annual reporting on progress at the level of the Senior Management Team. The policy also called for a review in 2015,¹⁷⁵ and on that basis TMEA developed a strategy designed to fill the gap TMEA identified of a 'lead authority on gender in regional trade and regional integration in East Africa'.¹⁷⁶ The 2015 Gender Strategy posits both mainstreaming and gender-targeted activities, beginning within the organisation itself, expanding to partners, and then to the wider trade environment. This document also notes that TMEA efforts to implement the gender policy prior to 2015 had been lacklustre, and that TMEA staff were not convinced gender was a priority. The remainder of S1 saw some improvement in implementation of the Strategy but there are a number of key gaps, as discussed in an October 2018 Gender Review¹⁷⁷ and in the next section.

¹⁷¹ World Bank 2013. Women and Trade in Africa: Realizing the potential. <http://documents.worldbank.org/curated/en/115591468211805723/Women-and-trade-in-Africa-realizing-the-potential>; Brenton, Paul, Nora DiHel, Mombert Hoppe, and Carmine Soprano. 2014. Improving behaviour at borders to promote trade formalization: The Charter for Cross-Border Traders. World Bank Policy Note No. 41, July 2014. <http://documents.worldbank.org/curated/en/894601468346146304/pdf/894730BRI0Char0Box0385291B00PUBLIC0.pdf>; Tyson, Judith E. 2018. One-stop border posts and informal livelihoods in Busia, Kenya, Development in Practice, 28:4, 562-573, DOI: 10.1080/09614524.2018.1442813. Available at: <https://doi.org/09614524.2018.1442813>; Tyson, Judith E. 2015. Effect of Sub-Saharan African trade corridors on vulnerable groups. Overseas Development Institute. Available at: <https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/10136.pdf>; UNCTAD. 2019. BORDERLINE: Women in informal cross-border trade in Malawi, the United Republic of Tanzania and Zambia; UNCTAD. 2018. East African Community Regional Integration: Trade and Gender Implications. Available at: https://unctad.org/en/PublicationsLibrary/ditc2017d2_en.pdf

¹⁷² World Bank Group and World Trade Organization, 2018. Trade and Poverty Reduction: New Evidence of Impacts in Developing Countries. World Trade Organization: Geneva.

¹⁷³ Buvinic, Mayra, Rebecca Furst-Nichols and Emily Coury Pryor. Undated. A Roadmap for Promoting Women's Economic Empowerment. United Nations Foundation and Exxon Mobil. Available at: http://www.womeneconroadmap.org/sites/default/files/WEE_Roadmap_Report_Final.pdf

¹⁷⁴ TMEA. 2012. TMEA Gender Policy.

¹⁷⁵ TMEA. 2015. TMEA Gender Audit.

¹⁷⁶ TMEA. 2015. TMEA Gender Strategy and Plan 2015-2017.

¹⁷⁷ Shaw, Amanda. 2018. TradeMark East Africa (TMEA: Gender Review). Work and Opportunities for Women (WOW) Helpdesk Query 9. Final Report. October 2018.

3.5.1 TMEA programming and gender

TMEA programming related to gender in S1 can be said to have fallen into four main types: efforts to mainstream gender in government institutions, efforts with civil society to develop gender-responsive policy frameworks, and gender-targeted direct activities with individual traders, entrepreneurs, and associations or organisations focused on women in these roles. TMEA also worked to improve its internal organisational culture with respect to gender. TMEA's most successful efforts were among the gender-targeted direct activities, while gender-responsive frameworks and mainstreaming gender in government institutions were less developed. Internal organisational culture has also improved in terms of opportunities for advancement within the organisation, but it is less clear that the organisational culture has incorporated gender as a programming priority. This section discusses these types of activities and the degree to which they were successful or not.

Mainstreaming gender

TMEA set the goal of mainstreaming gender in all three SOs. This included building in gender action plans for OSBPs, bringing women traders to the table about NTBs that affect them, and a thorough-going analysis of gender at Mombasa Port to be acted upon in S2.¹⁷⁸ The 2012 Gender Policy spoke specifically about this kind of mainstreaming, saying that TMEA would use its funding to leverage changes among partners, and would have periodic participatory review of partner policies. Evidence was scant about gender mainstreaming, and it was rarely brought up by partners or TMEA staff. The ways TMEA actually worked with partners around gender appeared to be lighter-touch than that proposed in the policy. Still, in SO1, OSBP gender action plans were drawn up and shared with government partners, and TMEA included gender and a Cross-Border Charter in border officer and manager training. TMEA facilitated the participation of women traders' organisations on Joint Border Committees (JBCs). Some women's organisations were asked to join National Monitoring Committees to ensure that those NTBs that disproportionately affect informal women traders are brought to the attention of authorities. The two groups thus invited reported having joined and that their issues were heard, if not universally resolved. In SO3, the number of women in given sectors was part of the targeting process for export capability projects. The Logistics component conducted a study on the sector that identified priorities for boosting women's participation.

However, national and regional partners did not always share the focus on gender at OSBPs. EAC materials – aside from one brief slot in a training session – did not mention women, gender, or cross-border charter standards. Partner respondents had no details about implementing gender action plans. Women's organisations reported their participation in JBCs, but border officials did not confirm this. The PE team also heard that the Simplified Trade Regime (STR) was in greater use. In export capability, a component with significant women's participation, a cartoon training book on good agricultural practices for one project had not one woman farmer in its pages. There were reports that the study conclusions from the logistics component on how to increase women's participation in the sector had not gained traction with donors.

Gender-responsive policy frameworks

The Women and Trade (WAT) programme was TMEA's major programming component on gender, targeting informal women traders at borders and export-ready women entrepreneurs and farmers with a US \$5m investment with a focus on improving women's participation in trade. The WAT had both macro and micro level goals. At the macro level, the projects under this programme worked to develop gender-sensitive frameworks and to engage government to implant such frameworks around cross-border trade and other gender-related issues. The 2012 Gender Policy pointed to investments just like this, and TMEA's evolution over the life of S1 demonstrated a commitment to supporting this work. The efforts proved challenging to carry out. Though government and other partner buy-in was not robust, the programme reported the following framework accomplishments in their RF:

- MoU between the EAC Secretariat and TMEA's regional women's organisation partner
- Burundi: TMEA supported advocacy for women street vendors, and helped remove a police block where harassment was common
- Tanzania: A policy dialogue on cross-border constraints, and studies were undertaken
- Kenya: An apex body helped women access trade opportunities and launched an application. A CSO studied creating a grievance mechanism and helped include gender in EAC policies.

¹⁷⁸ Global Consult Ltd. 2017. Gender mainstreaming assessment report at the port of Mombasa.

These activities were smaller scale and less strategically linked than the term ‘gender-responsive frameworks’ would imply. This component used its funding over the last two years of S1, across all EAC countries except Burundi, and covered the organisational work described in the next paragraph as well. Efforts to develop robust frameworks will take longer and require more resources.

Gender-targeted direct activities

TMEA’s gender-targeted programming took the form of the evolving Women and Trade Programme, which now has dedicated funding in S2. Some 30,000 women were trained on key trade processes and procedures, according to the RF. TMEA RF data also showed some income gains and reduced time to cross borders. Training women to use the Simplified Trade Regime (STR) empowered them with knowledge of their rights, particularly in parallel interventions with OSBP staff who were also trained. Focus group and interview respondents for the PGIS reported important effects on their incomes and businesses, and in feelings of empowerment at borders and in other domains of their lives that emerged from knowledge and the ability to trade, bolstered by the STR.

The ways of working with women’s groups – gender targeting, financial training, and women-to-women peer support – have been shown to help women take entrepreneurial risks they might not otherwise have taken in restrictive societies,¹⁷⁹ and this appears to have been responsible for some of TMEA’s success. To address the different ways poor and ‘very poor’ women take up and use new learning, other types of interventions may be necessary, including access to finance and gender-sensitive extension services for women entrepreneurs and farmers, or indeed ‘bundled services’ packages that have proven most successful among economic development programming for ‘very poor’ women in the developing world.¹⁸⁰ Programming in this area will also require collecting more regular and reliable data, including strong baselines, on income and on retention and use of training, as the S1 RF indicator data are limited and unclear at the outcome level.

TMEA’s internal culture and gender

TMEA has worked internally to mainstream gender, through some staff capacity building on how to mainstream in their activities, including this as a part of performance assessments, and seeking 30% gender representation. The PE found that TMEA had surpassed its 30% target for gender representation, with 45% of roles held by women in 2017 – but that level of representation was actually the case in 2011 as well and remains so to the present day (48%).¹⁸¹ Some staff categories, including management categories, that were more skewed towards men or towards women in 2011 became, by 2017, more evenly distributed. Women hold some leadership roles in the organisation, including one of three SO leads, the Chief Results Officer, and the newly created Director for Inclusive Trade. The Senior Leadership Team (SLT) included one woman at the time of fieldwork, though there have been periods when no women were on the SLT; there is one woman among four people on the Senior Management Team. Women are well-represented on the list of Board members, and to some degree on the NOCs as well. There are some opportunities for advancement and flexibility around location of many roles, allowing a wider range of interested applicants when positions do open, according to women who were interviewed on the topic.

The evaluation sample averaged about 75% men to 25% women among all those interviewed; among TMEA respondents were 38% women and 62% men, but 41% women from among leadership teams (corporate and country programme). These gender differences reflect the trade sector, which is traditionally populated by more men than women, but also show TMEA’s efforts to hire and promote women.

There were still (rare) responses among TMEA staff that their components or activities did not have any gender aspects to consider, however, and the perennial development problem several called ‘no bandwidth’ for work that they saw as outside their key remits. Reading through a selection of PARs, the PE team found lofty language about gender in some that did not line up well with how projects were actually rolled out, and not at all with achievements.¹⁸² The new post of Director for Sustainable and Inclusive trade raised the profile of gender, alongside a number of other issues.

¹⁷⁹ Cassar, Alessandra and Katz, Elizabeth. 2016. “Gender, Behavior, and Women’s Economic Empowerment” CGD Background Paper. Washington, DC: Center for Global Development. <http://www.cgdev.org/sites/default/files/gender-behavior-womens-economic-empowerment.pdf>

¹⁸⁰ Buvinic, Mayra and O’Donnell, Megan. 2016. Revisiting what works: Women, Economic Development, and Smart Design. Center for Global Development. Available at: http://www.womeneconroadmap.org/sites/default/files/CGD-Roadmap-Update_v4.pdf

¹⁸¹ Hansford, Frances, Julian King, David Vanzetti and Ozlem Akkurt. Unpublished. OPM TMEA Value for Money study.

¹⁸² The evaluation team has not said which PARs, as this would identify particular staffers.

3.5.2 Conclusions

TMEA's gender work in S1 was highly relevant in supporting women cross-border traders, given the importance of inclusivity and poverty reduction. Relevance of work on gender-responsive frameworks and mainstreaming were less relevant in that they were not as well linked or embedded in the institutions they targeted to affect. Effectiveness varied by type of project, in parallel with the efforts to implement the 2015 Gender Strategy: mainstreaming gender was not a focus, and it was less effective; direct interventions and in-house improvements to the TMEA organisational culture were both somewhat effective, and these were a focus of TMEA efforts. The latter also have the characteristic of being more fully within TMEA's control, where mainstreaming and implanting gender-responsive frameworks rely more on national willingness to prioritise these issues.

Mainstreaming gender had less traction – even where it was more assiduously pursued, as with OSBP programming. Other projects (such as gender at Mombasa Port or in the logistics industry) were slated for S2 and received only a lighter-touch effort in S1. The gender-responsive frameworks in SO3 also seemed to suffer from less focus on this area and too-short time horizons for project development in policy space. Gender-targeted work with women traders, entrepreneurs and farmers was more successful in terms of numbers trained and changed behaviours – with many trainees going on to use the STR successfully and improve their businesses.

Among TMEA's own human resources, the S1 goal of 30% women on staff was met and exceeded. There are women in leadership roles throughout the organisation, and career advancement opportunities, though promoting women to the Senior Leadership Team seems still a work in progress. It is also discouraging that there are still staff members who feel they do not have time to work on gender, or that they consider gender outside of their remit.

Gender mainstreaming as a donor imperative is not going to change but discussions of gender in policy documents that are not operationalised is too 'light touch' a response. That no one noticed no women farmers had been drawn in the training manual, that PARs spoke of gender but the projects did not include substantive attention to gender, or that EAC documentation for OSBP procedures did not reference gender, cross-border trade, or a policy against sexual harassment, means that TMEA still has work to do internally, and with partners. Mainstreaming will work only if it permeates TMEA's process as part of the organisation's identity, rather than as an add-on donor requirement.

4 Conclusions and lessons learned

Overall

1. Working holistically through a broad mandate, TMEA has had important successes that have affected East African trade systematically. The effectiveness of OSBP interventions would have been reduced without the ICT investments that facilitate them; engaging partners and promoting ownership go hand-in-hand with the goal of trade integration; and strengthening the private sector to advocate enabled a range of actors to take their proposals to government in a concerted fashion.
2. In the projects and components where TMEA proved most effective, change took time. Careful change management was a requirement. Projects with the goal of changing how an agency, or a CSO, or a parastatal works required more than 12, 18 or 24 months, because TMEA had to manage and address capacity weaknesses, political economy challenges, and resistance, alongside the content of the activity. Projects often exceeded their timeframes, for a variety of reasons, but with what seemed like standard project durations rather than realistic considerations of these inherent challenges. The Standards team needed to build a consensus about how to harmonise standards, and ensure the neutrality of the process, before technical committees could be charged with debating the standards and making their proposals. The Port Charter process met some milestones a year apart – owing to the need to bring so many disparate agencies together. Future challenges – such as rationalising the quality infrastructure, passing an NTBs Act amendment with a mechanism for redress, or encouraging port authorities towards more public-private models of port management, will similarly exceed normal project time frames.
3. Partner capacity was a major constraint on TMEA's success. Organisations and agencies appear to be hungry for the good project management techniques they saw TMEA teams using: needs assessments, VfM, getting a baseline before beginning, tracking inputs to outputs, employing change management with deep stakeholder consultation. Capacity is also closely linked with sustainability, and these two will be a consistent challenge for ongoing TMEA programming.

Gender and mainstreaming

4. The relevance of TMEA's gender work in S1 was high, given the importance of inclusivity in trade programming. Effectiveness varied by type of project. Mainstreaming gender seemed to have less traction – even where it was more assiduously pursued, as with OSBP programming. The gender-responsive frameworks in SO3 also seemed to suffer from too-short time horizons for projects working in policy space. Gender-targeted work with women traders, entrepreneurs and farmers was more successful in terms of numbers trained and changed behaviours – with many trainees going on to use the STR successfully and improve their businesses. Gender mainstreaming as a donor imperative is not going to change but unused gender policy documents is too 'light touch' a response. Despite more men working in the trade sector at large, TMEA beat its 30% goal for women on staff in S1, with women in a number of leadership roles. Some internal issues remain where gender is seen as an 'add-on' requirement rather than a fully integrated part of TMEA's identity.

Theories of Change

5. Using Theories of Change could be improved with effort given to ToCs and thinking about and systematically monitoring assumptions and causal linkages. Having one high-level ToC for such a broad programme, along with project-level results chains, was sub-optimal. The TMEA ToC did not adequately delineate how TMEA would work on the components that were chosen for intervention and donors did not demand that the ToC be more closely linked with what TMEA was working on. This would have helped TMEA to explain the 'missing middle' or 'meso-level', likely contributing to some of the day-to-day challenges that might have been identified and mitigated earlier in such a process – like low capacity levels across partners, the advent of the SGR, devolution, and the availability of key data from partners.
6. Foundational assumptions about causality rarely functioned as planned at outcome level, though some were stronger in achieving outcomes than others. The RF is somewhat helpful as a ToC-substitute on the ground but the indicators, baselines and target/actual data are poor and provide a weak basis for strategic review. The indicators and data did not verify the ToC over time, particularly at the level of outcomes. Some components are less well represented because national-level efforts were more diffuse, indicators were insufficient for tracking beyond outputs, or where data were not comparable.
7. Political economy affected TMEA in reaching their impact goals, in large part because of the time it took to resolve issues that arose from government handovers and reshuffling, the Kenyan elections, and diminishing appetite for regional integration. Part of an improved ToC process would involve tracking these issues

systematically and regularly. Donors were impressed with TMEA's political savvy and relationships and how they adjusted to flexibly address the challenges that emerged, adjusting timelines, reallocating funding, and mitigation. But their commitment to neutrality among their partners should not preclude more documented attention to these issues. TMEA continue to be well-placed and -connected in ways that other, more short-term donor projects are not, and in S2 they seek to build both supply and demand for improved conditions for trade. However, the political economy environment has deteriorated. TMEA will need to remain adept in the face of these challenges, by ensuring that the whole team, including the Board and NOCs, can access and feed into the discussions around how to address them. TMEA's system risks being ad hoc or incomplete by virtue of its cloaked nature.

Results and data

8. The value of the corridor observatory projects cannot be overestimated, and they go a long way towards improving data in the region. However, they could be much stronger – there are many data gaps (such as exports) and some figures are quite different from what is reported by international bodies, giving mixed impressions about key indicators. TMEA's TTS methodology was also less than optimal, giving impetus to the proposed S2 intervention for a system that would capture ongoing data at OSBPs. This would also differentiate time reductions (or increases) emerging from different interventions (from standards or from CMS, for example) and would be a powerful transparency tool. The RF was very weak at representing TMEA accomplishments by the end of S1, and donors did not catch the problems or insist that they be improved. The Results Meter was partially successful as a remedy at the level of outcomes, but the utility of the RF at other levels was very low for both accountability and learning.
9. The level of understanding of baselines, targets and data quality among partners was low. They were not held to account on issues of data quality that affected TMEA's own reporting. M&E team members at TMEA cannot have failed to notice how their data did not match what the RF called for. But donors also did not insist on improvements. Key gaps were most pronounced at outcome level, as with indicators that lacked a necessary denominator, or were reported with different units from different countries.
10. Overloading the programme with evaluative exercises has a cost. Respondents – TMEA and partners – came prepared for delimited PE interviews with Power Point Presentations, success stories, and very little time for a robust discussion. TMEA staff understand the need for and the value of evaluation, but the degree to which their schedules and tasks are interrupted is excessive. Donors have their own reporting schedules but by pooling with one another for this enterprise, there is an expectation that they can think 'outside the box' together – through the TMEA Evaluation Committee, perhaps – about how to do this better.

Coherence and coordination

11. Coherence and coordination paid big dividends for a development programme that aims to be an institution in the region. Some perspectives are concerned that TMEA might replace government will to undertake necessary reforms themselves. With its more neutral private sector stance and commitment to being demand-driven, TMEA has minimised that threat by ensuring ownership. However, the key for ownership turns on sustainability.
12. TMEA's interventions supported government and private sector particularly in areas that might otherwise not have been funded or funded sufficiently. At national levels, RI is a supranational goal, and was therefore less supported than domestic efforts around trade; in this way, TMEA's support can be said to be complementary to those efforts. Particularly the private sector apex body efforts in Kenya and regionally benefited from TMEA's complementary funding for RI-focused initiatives.
13. TMEA's strengths included good internal functionality, a technically strong team, and working with a demand-driven model that encouraged country and regional ownership. They also built durable and consistent relationships with partners. TMEA's outsized influence meant they operated at a level that was beyond individual, one-off bilateral efforts and were able to take a longer view, and propose more ambitious goals, while simultaneously pursuing support for these 'catalytic' investments. TMEA worked synergistically between its components and its small country teams were particular examples of this kind of work. Synergies between the SO1 and SO2 work on accessing 'the pipeline' for trade and the SO3 export capability work to 'fill' the pipeline were incipient in S1 and seem to be a growth area in S2.
14. TMEA used the demand-driven model with the EAC Secretariat and EABC, gaining buy-in and encouraging ownership. TMEA's office in Arusha was valuable for both political and technical support to the Secretariat. Embedding staff in several departments was cited as a good practice. The Project Coordination Committee helped organise the engagement and monitor progress, while building credibility with the Secretariat. Strong communications between partner states and regional authorities as well as between projects and partners were key, always with an eye towards 'possible points of collaboration'.

Governance and structure

15. Governance structures fit donors' needs and consolidated their development priorities, funnelled oversight of partners, and ensured resolute local strategic and operational input through the Board and NOCs, respectively. Concerns with increasing layers of approvals were increasing, and a virtual solution appeared to help somewhat. The greatest drawback for TMEA and partners was in the delays these additional layers added to approval processes. The more arm's-length relationship with donors, broad sweep of geographic and thematic interventions, increased burden of evaluative exercises, and less influence over the broad technical challenges in the RF are related and will have to be addressed in future programming.
16. The NOCs serve an invaluable function for TMEA by seating decision-making and problem solving in the hands of strong national actors with vested interest in TMEA's success. There continue to be concerns (primarily from country teams) about technical control at headquarters, particularly around local knowledge not being given precedence, and around the matrix model of management which requires several steps in the approvals process.
17. Setting TMEA up as a CLG/SPV played a part in TMEA's success. TMEA's position as an institution independent from other agencies in East Africa, its institutional longevity and that of its expert personnel, and its focus on trade have established the image of a neutral broker. The SPV also allows TMEA to aggregate and maximise donor interests while de-politicising donor relationships with partners. The model allows TMEA to achieve where other models might have important limits, such as short time frames, more rigid contracts, political risks, or challenging relationships with trustees. The model allows for calculated risk-taking in line with TMEA's portfolio programme and donors' interest in 'doing development differently.'
18. The system of governance involving the Council, the Board, and the NOCs allows for bespoke risk management, provides entry through well-positioned local leaders, builds in useful donor oversight and critique that is also balanced with East African viewpoints. In this respect the donor operational model is also beneficial for ensuring the substantial consideration and incorporation of those viewpoints.
19. The multi-donor operational model was broadly appropriate and efficient for delivering TMEA. TMEA partners shared donors' goals on trade and integration. Bringing donors together who could not have funded a programme of the size, duration, or complexity of TMEA individually was efficient. The longer duration of TMEA lowers the transaction, human resource, and administrative costs. Managing the programme more at arm's-length enabled a greater sense of partner control over decision-making and greater partner ownership. There was good coordination with external donors as well, including complementary and synergistic work that filled gaps and avoided duplication of efforts. Challenges included donors' earmarking, their multiple evaluative exercises, and M&E requirements.
20. Apropos of 'doing development differently', TMEA's more adaptive and locally driven model provides important benefits but also tests the relationship between donors and implementers. In theory, such an arm's-length relationship would mean that donor influence and control over programming would be reduced, and implementers and – especially – national partners would be more empowered to seek and implement locally-determined solutions. TMEA's situation is neither traditional nor thoroughly "arm's-length", with the Council and the two donors serving on the Board still exercising significant influence on strategic decision-making. On the other hand, donors also did not hold TMEA to account on their theory of change processes, or on indicator and data quality in S1 – a lapse in key technical oversight. In addition to different management styles from changing personnel, what seems evident is that DFID's adoption of 'doing development differently' tenets has left advisers with room for interpretation.

Particular strategies

21. Bilateral efforts to resolve NTBs appear to be a lesson TMEA have already incorporated into programming even during S1, as they were more effective for resolving NTBs by lowering the stakes for national participants. For the component to have more durable outcomes, however, there will need to be more pressure and political will around SCT and CMP norms. For TMEA, or perhaps other donors, this may mean increased policy work at the regional level to amend the NTB Act with a legal means to contest NTBs and consequences for countries who impose them.
22. Standards could have been stronger with a closer link between harmonisation efforts at regional level and the bureau-level interventions in countries. There is a notation in the RF that TMEA could not 'influence national decisions about whether to adopt the standards', but one of the benefits of the close relationships, demand-driven model, political neutrality, and good connections of country programme NOCs is to pave the way for that kind of advocacy.

23. Several issues constrain OSBP effectiveness. If engineering works are not complete when operations start, an OSBP cannot work as intended. This has affected both Malaba and Kagitumba-Mirama Hills, where roads were in a bad condition for some time and road construction took place in an uncoordinated way. In addition, the location of the Kagitumba-Mirama Hills OSBP may not yield benefits if transporters are not convinced because of the greater distance to Kigali than the route through Katuna-Gatuna. In addition to the inefficiency of spending funds on a route that as yet has not garnered traffic, the Government seconded more staff there in anticipation of greater trade that did not immediately materialise. Staff were bored and revenue did not significantly increase. That case holds a lesson from adopting a project from an earlier programme (that of the World Bank). Finally, silo thinking within or between government agencies can be a constraint, since the model relies on their constant collaboration.
24. Building the pipeline itself is a worthwhile goal but filling the pipeline is what will change East Africa for the better. The region's governments need to export more, with more added value, to make a durable difference in their economies, including jobs, wages, prices, and consumer safety. Large firms in the region were able to take advantage of the new systems with relative ease, to import more into the region at lower cost, but exports and intra-EAC trade are further behind. SMEs make up the majority of the businesses in East Africa and most of its employment, and are a big part of the solution for prosperity in the region – including inclusive prosperity. Partner States are especially keen to boost exports at a level significant enough to increase foreign exchange and reduce trade deficits.

Sustainability

25. Capacity building is sustainable only as far as it is embedded in institutions. The scope of TMEA's S1 programming makes this challenging, however, considering the vast number of agency employees across six countries and the Secretariat. Projects that resulted in legislation or policy changes, or were included in budgeting or planning, were more likely to be sustainable; TMEA sought this through clauses in MoUs and working with steering and technical committees. However, political economy could and did interrupt best intentions on sustainability. Sustainability was noticeably more in question with SO3 partners from among private sector and civil society associations, SMEs, cooperatives, and other programming at grassroots levels, where initial capacity and funding were weak. Models that provide a way to make revenue offer a promising way to self-sustain, but at present are in nascent stages. Incentives for sustaining some systems might also come from increased revenue, as with Customs system integration and Single Windows – but in these cases, the agencies brought on to use the system would need to see a direct benefit from adopting it.
26. Stakeholders most commonly cited lessons of a project management nature: TMEA had a strong demonstration effect. Agency partners cited lessons from needs assessments, VfM, using timelines, 'linking activities with outputs' and using baselines with M&E, improving procurement, and using knowledge products more effectively. Change management – in which staffers' concerns were carefully considered – was cited as a lesson. Private sector partners felt the platform model helped them speak with one voice, even across the region, and that using research and evidence strengthened their stances. Export capability partners cited the value of highly 'hands-on' training. Both TMEA staff and TMEA donors suggested longer 'more realistic' project time frames to avoid extensions.

5 Recommendations

Overall

1. **TMEA should take on less to accomplish more.** The breadth of S1 programming made an important difference for comprehensive regional integration efforts but there were significant political economy and capacity challenges in most components– which TMEA call Intermediate Outcomes (IOs) in S2. Make strategic decisions about the agencies to support with ICT for Trade, or the PSOs/CSOs to support on advocacy, for example, and ensure that the projects are in-depth enough to effect the kinds of differences envisioned in theories of change. Part of the strategic decision-making for this should include those partners that are both well-placed to influence systematic change, and proactively seeking to do so. Projects and IOs need more realistic timelines that include the capacity building and political relationships that must be carried out. The portfolio programme model had its benefits – and there is still room for experimentation – but TMEA could easily stretch itself too thin with the transaction costs (in time and funds) to expand to new countries.
2. **TMEA should look at capacity building holistically**, but plan at the detail level. Develop a capacity building framework that guides project design and appraisal planning including exit planning. Bring in organisational development technical assistance as a condition of partnership, to include detailed planning for organisational change measurement with purpose-built rubrics around capacity goals established with each partner. Conduct needs assessments that foreground capacity building gaps identified in S1. Track institutional capacity building assumptions and act remedially when those assumptions do not hold. Continue to use tools like cost-share and embedding, as in S1. This recommendation builds on itself as TMEA learns how to do this better with each iteration. At a project level, take on fewer projects with organisations requiring in-depth efforts to build basic capacities: rather than working with several organisations with many goals for each, focus on one or two in a sector or country that can be key partners for the long term. Institutional capacity building should start from stakeholders who know what they need. Focus on agencies and organisations where partners share the appetite for change – by frank and strategic discussions on capacity challenges – including in monitoring and measurement (see Recommendation 9, below) – from the earliest stages. Use change management strategies learned with other interventions like SWIFTs and CMS, and continue using these systems for institutional capacity building.

TMEA should continue demonstrating good project management and incorporate these skills into capacity building for implementing partners. Adult learners do best with significant hands-on training, to help them conduct their own audits or needs assessments, or construct VfM or other M&E KPIs. Helping them develop better procurement rules, set timelines, or decide on change management priorities and methods. Ensure cascaded training uses inclusive materials and methods, including active learning.

Donors should support this work for its long-term institution-building effects, for its alignment with the Paris Declaration imperative for country ownership, and for its realistic pathway to systems change. The more visible and measurable outcomes that tend to be in donors' focus may be slower to materialise, but also more durable, relevant, and country-led.

Gender

3. **TMEA should continue to work with women in trade at borders and with organisations like co-ops and other export-ready groups.** TMEA has expressed impressive numeric goals for this work in S2 that are less important than building capacity and supporting durable access to markets – the programme should emphasise quality of the interventions and outcomes over quantity. There are additional recommendations and details on this point in the Poverty and Gender Impact Study but, in short, devote attention to working with the 'very poor' and with women and men living with disabilities to improve long-term outcomes, which will require more in-depth programming – perhaps 'bundled' or with partners – to ameliorate the intergenerational and multidimensional poverty faced by the most vulnerable. At the same time, indicators at outcome level should reflect longer-term policy change and systems that are also targeted – not just aggregated numbers of those supported, or policy papers submitted. Ensuring that the interventions work for the poorest and embedding policy in institutions require effort and resources, but both should be prioritised over simple numeric goals.

TMEA should also capitalise on opportunities to mainstream gender in other IOs of S2, such as the interest expressed in the logistics industry, to ensure that authentic gender-focused activities permeate on-the-ground implementation. Where TMEA promoted gender inclusion and attention to gender-based issues, as in OSBP functioning, TMEA should work to include gender in actionable ways like ensuring that EAC and national OSBP manuals, training, procedures and operations also feature gender issues and reference expectations (such as the Cross Border Charter) regarding marginalised traders.

4. **TMEA should implement the 2015 Gender Strategy**, or its S2 equivalent, internally and with partners. The planned annual gender audits should be used to look closely at how project statements about gender in PARs are implemented, and to track indicators on gender. Bring in trade and gender experts for audits, but also across the research agenda, and for IO planning. Gender should be part of the ToC process recommended below as IO and country teams look at how to have a wider impact on the poor – and to document it. This also requires stronger gender indicators – both outputs and outcomes – as well as baselines, identifying gendered aspects of transport and trade systems work, and overall stronger monitoring with attention to context and assumptions.

Theories of Change

5. **The consortium of donors should ensure that TMEA employs an iterative and candid ToC process** at the level of programme IOs, with a parallel exercise – repeated twice annually – of planning across IOs. There was considerable cross-pollination among components in S1, and logically so, given the interconnected nature of TMEA's programming. This bears continuing in S2. Evidence for whether TMEA component programming led to increased trade, and thereafter to reduced poverty, was inconclusive in this evaluation, and will remain extremely difficult to quantify or to track conclusively, particularly with regard to contribution. The more operational and useful levels of the TOC, therefore, are at this IO level, where TMEA can have more measurable results in S2.

Such a process should involve country team members, rather than being an HQ-directed exercise. A bi-annual exercise is suggested so that the people who know the most about strengths and challenges can focus operationally on what is and is not working and why. Leadership will need to establish space for open discussions in which staff can speak freely about problems without fear that they will be held responsible for those problems. Given that TMEA aims to remain in the trade space in East Africa, it would benefit their team to establish such open space for discussion, deeply questioning the assumptions that underpin both the project-level activities and the higher aspirations of the IOs. Mapping an agency's permitting or testing and certification processes is valuable at the project level, for example, but mapping the agencies in a country or the greater quality improvement structure is necessary for long-term changes like those proposed. Staff involved at IO level – across IOs – will be best placed to provide the necessary candour and support their team members to find timely solutions or adjustments.

It may also be preferable, given TMEA's expansion, to allow greater differentiation of ToCs by Country Programme. The iterative process described above should candidly consider political economy and contextual realities about what can be accomplished. Involve Board and NOC members in examining assumptions and strategizing about what steps are possible to remove or reduce the political economy and other obstacles, and to re-think programming when such steps are not possible. The ToC should not be an overarching roadmap of the spheres of activity necessary for increased trade. **Donors should be part of this process at a strategic level** and, while listening to the knowledgeable East Africans staff and Board about political economy and contextual issues, should also play devil's advocate around assumptions and causal links, and be prepared to bring research, best practices and challenges from other interventions.

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6. **TMEA should pay more attention to monitoring and managing assumptions at the IO level** – examining the assumptions that underpin strategic design is separate from looking at risks by project. While political economy, international economic downturns, and other unexpected and exogenous effects can deeply impact TMEA programming, there are far more threats to success that are foreseeable. These were not carefully plumbed, at least on paper, during S1. Data should be collected, for example, to check assumptions about connectivity and electrical supply at OSBPs to keep ICT systems up and running, or on the successes and failures in acceptance of harmonised standards by national staff at borders. The highly political environment and multiple powerful interests within the sector demand that assumptions be reckoned with systematically. This includes assumptions about political economy and political will for reforms; operational assumptions about government commitment to utilising infrastructure in the manner intended; and assumptions about capacity in organisations and agencies with whom TMEA decides to partner. Collect

regular data about these assumptions that feeds into the iterative ToC process described in Recommendation 1.

7. **Other key questions require research.** TMEA and donors should develop a research agenda on key unknowns that affect programming. Are trade cost reductions passed through to consumers? When are producers 'export-ready', and what are the incentives? What bundle of interventions will help the very poor beneficiaries like informal traders? What are the remaining bottlenecks at border posts that are not captured in the TTS – including variance in crossing times? Are border inspectors incentivised sufficiently for mutual recognition of harmonised standards? What are the tipping points or drivers for firms to make the decision to export or export more?

Results and data

8. **The donors and TMEA need to improve indicators and data quality across the board.** TMEA and the Council should have an open dialogue about their expectations for the RF, at a greater level of detail. In S1, quality monitoring for the RF as a tool for ongoing reflection was abandoned at some point, resulting in a highly problematic record of TMEA's successes. For typical development interventions, the RF can serve donors' needs well to report home on progress and monitor contractor compliance. But TMEA's portfolio approach requires a more flexible relationship with RF indicators that shifts with programming. Second, the size of the programme has made it harder for donors to manage these issues closely, exacerbated in S1 by turnover in donor management. Successive annual reviews noted the same problems with data that were not remedied, resulting in indicators with incomparable data, or no data, and gaps in coverage. TMEA should fund the Northern Corridor observatory project, for example, to collect data relating to exports, as it is a national and EAC priority.

Third, TMEA's corporate-level indicators should report at a system-level scale, not a project-level scale (numbers of trainees or even 'trained entities'). Rolling these types of indicators up to strategic level tells an incomplete story. TMEA's Corporate headquarters and its country leadership should strike a better balance with country-led strategic design and indicator development, and overall regional goals, with higher order indicators. Country programmes and donor representatives should be more deeply engaged around quality indicators for IOs at the national level, and overall donor oversight should show greater commitment to developing an exemplary regional level RF, and helping TMEA secure the appropriate data for it. These needs will intensify as interventions and countries expand in S2.

9. **Improving indicators also means more TMEA support to partners on data.** Train partners to produce the kinds of data that will show what they and TMEA are accomplishing together. This means clear baselines (prior to using new standards equipment, for example, or on transit times) and realistic targets appropriate at programme levels. Most importantly, when there are gaps in the data like those pointed out in this report, TMEA (and donors who are monitoring data more regularly) should flag and remedy these problems, rather than letting the problems compound over time. TMEA's MEL team may need support first, to have the capacity to help partners build stronger data procedures in their institutions.
10. **The Evaluation Committee should schedule prioritise and limit donor evaluative work.** Donors, TMEA and the Committee should limit the number of interruptions to their time on task. Evaluation should be prioritised and appropriately scheduled and use more 'light touch' or data-focused techniques. Importantly, the donors, TMEA and the Evaluation Committee should undertake evaluative exercises without revisiting issues repeatedly to fit different scopes of work. The group should also be sure that evaluation products are useful and targeted, and then shared in digestible formats with country offices.

Coherence and coordination

11. **TMEA should continue with its demand-driven, 'neutral broker' model of operations** that worked so well in S1. Continue to provide incentives to partners for new systems and for reforms by giving stakeholders a strong say in what will be done, and how. Continue to nurture relationships and build the TMEA team's technical and interpersonal strengths to facilitate entry and implementation.
12. **TMEA should formalise their coordination with other donors, and TMEA donors should help ensure this happens successfully.** There would be strong benefits to more formal and structured coordination with other donors – through existing structures such as the working groups or following a prioritised schedule. Though this is a challenging role, TMEA's size, longer duration, and placement in the key capitals of the EAC should play a key role in sectoral coordination. As the 'catalytic' partner, acting as a leader in the sector would offer more opportunities to leverage other donors' priorities, conduct joint research (while sharing costs), and acting in a coordinated fashion on political economy issues that threaten the sector as a whole. Coordination with other donors on productive project work could also leverage other donors' investments to better 'fill the pipeline' of national exports.

Governance and structure

13. **TMEA and donors should maintain the current structure, while looking for ways to streamline.**
Preserve the structure that was shown to fit donors' and partners' needs, and to put local knowledge and connections front and centre in decision-making and problem-solving. At the same time, increasing layers of approvals and longer timelines for this process will constrain TMEA in S2, given the broader geographies. Using technology to fast-track some expenditures is one way to streamline that has already been tested, but could be applied to more approvals, such as with processes pre-approved by NOCs and country donor leads.
14. **Donors need to make choices about 'doing development differently'.** For all the ways TMEA is different, at present it remains a donor-funded programme. Donor influence and control over programming is much the same as in other development partner programming, with the exception of close scrutiny of the RF and ToC process. If donors are committed to precepts about genuine country ownership and empowerment, they might limit earmarking, sponsor national priority-setting fora, or facilitate TMEA's interests in self-funding models. However, with such an important financial stake in TMEA, donors should not compromise on close attention to project management fundamentals and technical oversight on ToCs and results reporting, and they should ensure handovers are thorough and infrequent.

Particular strategies

15. **Donors and TMEA should ensure robust SME participation across S2 programming in TMEA.** Since SMEs drive the region's economies, it makes sense that entrepreneurs at this level would have a bigger seat at the table. Given S2's focus areas, it is likely that this recommendation has already been taken on board, as discussed with the Standards team lead, concerning the participation of SMEs on technical committees for harmonising standards; or with the Logistics lead, who noted the need to buttress the skillsets of smaller, local firms in transport and logistics services. Introducing greater SME participation as a goal for platforms and apex bodies has the potential for wider participation in these as well.
16. **TMEA should conduct strategic mapping** around the plethora of trade agencies in SO2 (for both ICT4T and Standards) to make evidence-based and politically savvy decisions about which agencies to support. Empower the IO leads to work cross-nationally on the key question of how a regional quality infrastructure would look and perform, and undertake programming based on that broader view.
17. **TMEA should raise the stakes on NTBs** by increased policy work to amend the NTB Act with a legal means to contest NTBs and consequences for countries who impose them.
18. **TMEA should monitor mutual recognition of harmonised standards at** , to understand the extent of implementation of EAC-agreed procedures for accepting certified products with no further inspection or duties paid. TMEA should also collect and report on the degree to which time and cost for traders is impacted, against targets. This would involve programming specifically for that outcome, and working with national bureaux of standards on how they collect data, how they train border staff, and how they ensure compliance at remote sites (that is, borders).

Sustainability

19. **TMEA 'taking on less to accomplish more' (Recommendation 1) supports sustainability as well.**
Selecting a smaller number of partners would allow TMEA to work more strategically with those partners, resulting in strongly embedded institutional capacity, legislation or policy changes, budget line items, development of revenue sources, or other markers of sustainability. This is especially important where initial capacity for fundraising and fiduciary management and even core functions are weak, as with the smaller, less experienced co-operatives or small CSOs in SO3. Longer-term TMEA projects with institutions offer both an opportunity and a risk. A longer project allows space for thoughtful stakeholder-based processes to identify and work on capacity needs. To avoid the risk – becoming part of the institution – this kind of work requires a steady but sure handover.