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Evaluation of the Non-tariff Measures Programme

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Acronyms

Unless otherwise specified, all reference to dollars (\$) are to United States dollars, and all reference to tons are to metric tons.

AfDB	African Development Bank
BNEDT	Bureau National d'Etudes Techniques et de Développement
CAF	Corporación Andina de Fomento
CNSOC	Comité National de Suivi des obstacles Au Commerce
COMESA-	Common Market for Eastern and Southern Africa
DFID	Department for International Development
DMD	Division of Market Development
EAC	East African Community
EC	Enterprise Competitiveness section
ECOWAS	Economic Community of West African States
EQM	Export Quality Management team
EU	European Union
FAO	Food and Agriculture Organization
FDI	Foreign Direct Investment
GVC	Global Value Chains
HACCP	Hazards Analysis and Critical Control Points
IEU	Independent Evaluation Unit
ITC	International Trade Centre
ITFC	Islamic Trade Finance Corporation
LDCs	Least Developed Countries
Macmap	Market Access Map
MAR	Market Analysis and Research section
MAST	Multi-Agency Support Team
MOU	Memorandum of Understanding
NTMs	Non-Tariff Measures
OA	Office for Africa
OAP	Office for Asia and the Pacific
OAS	Office for Arab States
OCOD	Observatoire de la Célérité des Opérations de Dédouanement
OECD-DAC	Organisation for Economic Cooperation and Development-Development Assistance Committee
OLAC	Office for Latin America and the Caribbean
PACIR	Programme d'Appui au Commerce et à l'Intégration Régionale
PalTrade	Palestine Trade Centre
POs	Procedural Obstacles
RBM	Results-Based Management

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SADC	Southern African Development Community
SDGs	Sustainable Development Goals
SMEs	Small and Medium Enterprises
SPS	Sanitary and Phytosanitary
STDF	Standards and Trade Development Facility
TBE	Trade-related Business Environment
TBT	Technical Barriers to Trade
TFA	Trade Facilitation Agreement
TFPB	Trade Facilitation and Policy for Business section
TIFM	Euro-Med Trade and Investment Facilitation Mechanism project
TISIs	Trade and Investment Support Institutions
TMI	Trade and Market Intelligence section
TOAM	Trade Obstacles Alert Mechanism
ToC	Theory of Change
TRAINS	Trade Analysis Information System
TRTA	Trade Related Technical Assistance
UEMOA	Union Économique et Monétaire Ouest-Africaine
UN	United Nations
UNCTAD	United Nations Conference on Trade and Development
UNDP	United Nations Development Programme
UNECE	United Nations Economic Commission for Europe
UNESCWA	United Nations Economic and Social Commission for West Asia
USAID	United States Agency for International Development
WCO	World Customs Organization
WITS	World Integrated Trade Solution database
WTO	World Trade Organization

Executive Summary

Introduction

- I. This report is prepared in the context of the evaluation of the Non-Tariff Measures (NTM) Programme (herein referred to as the Programme). This Programme was to address the costly trade barriers resulting from NTMs and related procedural obstacles to trade in goods and services through increased transparency and supporting initiatives aimed at mitigating identified barriers. The Department for International Development (DFID) of the United Kingdom funded the Programme and the International Trade Centre (ITC) implemented it in two phases, the first from 2010 to 2013 (GBP 1.65 million [around USD 2.6 million]) and the second from 2013 to 2016 (GBP 2.69 million [around USD 4.3 million]).
- II. The purpose of the evaluation is to assess, systematically and objectively, the NTM Programme design, performance and results. Specifically, the evaluation aims assessing the performance and results of the NTM programme in line with the objectives stipulated in the two successive Memoranda of understanding (MOUs) and revised in other programme documents. It also has the objective to generate learning and insights and provide recommendations for the successive phases of the programme.

The Programme

- III. During the period under evaluation scope, the Programme has incrementally developed from an innovative pilot technical project focusing on NTM nomenclature and statistical issues, into a full-fledged programme ultimately aimed at supporting Programme stakeholders to mitigate the negative effects of NTMs. The Programme has successively been built into four components. Component 1 (NTM Data collection of NTM data/requirements on specific markets/countries and their dissemination through a database for enhanced enterprises' knowledge) and Component 2 (NTM Surveys and Related Analyses: realization of national surveys with enterprises, which give rise to national or regional analysis), were initiated with the first MOU (MOU 1) since January 2010. With the two successive components included in second MOU (MOU 2) in September 2013, the ambitions evolved into a full-fledged programme. Component 3 (Initiatives to mitigate NTM-related trade obstacles: enhancement of business environment through the implementation of initiatives to overcome trade obstacles identified in components 1 and 2) and Component 4 (Services trade regulations (not addressed in the evaluation) increase in understanding and use of key international organizations of the taxonomy for services trade regulations).
- IV. The Programme's impact was stated as follows: "The international competitiveness of SMEs in developing countries and transition economies is improved in an inclusive and sustainable manner by enabling policy makers and other international and international stakeholders to take concrete actions to enhance inclusiveness and sustainability of trade." To contribute to this impact level result, the NTM Programme was to achieve the following intermediate outcome level results:
 - a. "Increased stakeholders' common understanding of SME's concerns with regulatory and procedural trade obstacles." This intermediate outcome was to be covered through components 1 and 2.
 - b. "Enhanced capacity of decision-makers to take actions to overcome the identified NTM barriers." This intermediate outcome was to be covered through component 3.
- V. The Programme only developed a theory of change in September 2016. To enhance evaluation-learning purposes and utility, the evaluation worked on reconstructing the Programme's theory of change. A theory of change presents the assumptions underlying what is needed for the Programme's results to be achieved. It also explains the logic behind the results framework and describes how each level of results are linked to ensure inputs, activities and outputs contribute to achieving the outcomes and the impact. The theory of change can be found in sub-section 1.3 below.
- VI. To contribute to the impact level result, the two intermediated level outcomes stated above were to be achieved. For the Programme to reach the first intermediate outcome's targets, it

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needed to raise awareness among all trade stakeholders about the importance of the NTM linked obstacles the SMEs are facing. It needed to build and share knowledge on the subject and improve stakeholders' skills in tackling these challenges. It hence collected data (e.g. through surveys) and disseminated it (e.g. through databases and reports).

- VII. As for intermediate outcome 2, it was to be achieved on the basis of the first one. The idea was to design and implement action plans, which would take into consideration the knowledge, skills and solutions identified through intermediate outcome 1. Tools such as ITC's Trade Obstacles Alert Mechanism (TOAM) exemplify how intermediate outcome 2 was intended to be reached in addition to action plans and other similar tools.
- VIII. The ITC worked with national partners in the targeted countries for implementation: survey firms, beneficiary government institutions (TISIs) and SMEs.

Evaluation methodology and criteria

- IX. The main lines of enquiry used to conduct this evaluation were document review, interviews (in Geneva, with ITC staff, in the visited countries as well as remotely with other country representatives from TISIs, survey firms and SMEs), field visits (two countries, Côte d'Ivoire and Sri Lanka), thematic research and survey (with some limitations). The evaluation team firstly conducted the fact-finding missions in the two countries. From these missions, initial country reports were developed. Followed the rest of the data collection used for triangulation, analysis and report writing.
- X. The below report hence presents the findings and conclusions derived from this data collection process. From these findings and conclusions are also distilled lessons learned and recommendations useful for the ITC implementation team. These main elements were presented in a first draft of the evaluation report for which the evaluation team collected comments, questions and factual corrections. Based on this feedback, the relevant comments were integrated into the final evaluation report.

Main findings

- XI. The main findings are presented in the table below together with related conclusions and recommendations.
- XII. The evaluation used OECD-DAC criteria and evaluation crosscutting dimensions to conduct the Programme's performance analysis. The Programme's overall ratings, in addition to the criteria related ratings, follows the table are with a list of the overall lessons learned from the evaluation. In terms of Programme accountability, it is worth mentioning that ratings represent a combined assessment of performance mainly against the theory of change and incidentally against the Programme's commitments with the donor under the two successive MOUs, the former being used more particularly in terms of the overall performance rating.

Findings & Evidence	Conclusion	Recommendations
<u>Relevance</u>		
<p><i>Alignment with beneficiary needs</i></p> <ul style="list-style-type: none"> Considering the importance of NTMs on trade development, and even more so for SMEs, in particular in developing countries, the broader strategic intent of the NTM Programme is fully aligned with ITC mandate as the latter directly targets enhancing SME competitiveness and inclusiveness. The Programme’s objectives of working towards tackling the negative effects of NTMs is aligned with the major preoccupations the beneficiaries from the private sector express, particularly SMEs. As for the public sector beneficiaries, the fact that the Programme is demand based—i.e. the countries need to formulate an official demand to take part in the Programme—demonstrate that it is aligned with their needs. The business lens approach applied to ITC’s analyses on NTM is unanimously valued. In addition to NTMs being considered and identified as the most significant and basic form of trade obstacles, taking into account the importance of integrating the Programme’s targeted countries into Global Value Chains (GVCs), NTMs and the solutions to mitigate their negative effects are all the more important issues to address for policy makers, TISIs and enterprises. <p>The economic development of these countries is increasingly depending on business integration within GVCs and policy makers, TISIs and enterprises are often faced with NTM issues, which hinders them in their endeavour to do so.</p>	<p>The concept at the basis of the Programme (i.e. mitigating NTMs’ negative effects) is overall aligned with beneficiary needs. NTMs are at the centre of many public and private sector representatives concerns; the NTM Programme aimed at addressing these. Flexibility and adaptability is required to address different <i>types</i> of needs of different types of stakeholders and contexts.</p> <p>With the second MOU since 2013, the Programme evolved into supporting initiatives aimed at mitigating identified barriers and its components and the way they were designed and implemented did not fully take into consideration these different contexts and needs.</p> <p>Beyond the legitimate concern for producing good quality technical outputs, it is necessary to address partners’ and beneficiaries’ development needs and priorities for the purpose of impact and sustainability.</p> <p>In terms of adapting to context, Programme relevance would have benefited from Programme-embedded country guidance and intelligence from the Sections of the ITC Division for Country Programmes.</p>	<p style="text-align: center;"><i>It is recommended that all recommendations are carried out on a matrix management approach, and under the overall guidance and supervision of the NTM Programme Sponsor</i></p> <p>Recommendation 1: To pave the way for sustainability and impact at the beginning of the survey cycle, ensure consistency with partners’ and beneficiaries’ development needs and priorities:</p> <ul style="list-style-type: none"> First discuss with government focal point in the field in what ways they wish to make use of the survey results (e.g. replicating the survey in the future? use the survey skills and tailor to other public sector initiatives?) and confirm their perspectives. Second, based on the conclusions of these initial discussions, consider who would be the best implementing partners in the country corresponding to the purpose. Third, design a flexible solution addressing the needs of partners and beneficiaries. Fourth, use these criteria for the selection of the most suitable services

Findings & Evidence	Conclusion	Recommendations
<p><i>Database</i></p> <ul style="list-style-type: none"> With different types of beneficiaries come different types of needs. The Programme's NTM database was designed to be SME user-friendly. Unfortunately, the evaluation team could not assess if the SMEs considered the database useful for their needs, as it was not possible to actually observe evidence on the use of the database by beneficiaries. 	<p>Concerning addressing the needs of different stakeholders, the programme would have benefited from a more systematic and an organic cooperation from the ITC technical sections providing NTM-related services targeted at different categories of partners and beneficiaries.</p>	<p>providers, while paying due attention to quality requirements for outputs.</p> <p><i>Responsibility for implementation:</i></p> <p><i>Trade and Market Intelligence Section with the active support and engagement of the responsible Section of the Division for Country Programmes</i></p>
<p><i>NTM Survey</i></p> <ul style="list-style-type: none"> All categories of stakeholders noted the value of the NTM survey approach. The value of the survey is mainly seen in providing information for stakeholders to learn about NTM related knowledge. <p>Although the survey data was not meant specifically for the use of the private sector, the NTM national surveys were considered relevant by surveyed SME representatives because they provided them the opportunity to voice NTM elements that were important to them. The public sector representatives also found it useful to be conveyed with NTM-related problems faced by enterprises through a technically credible and objective third party.</p> <ul style="list-style-type: none"> The data and related analysis generated through the Programme is considered somewhat too strategic and detailed for the needs of the SMEs. The SMEs would have needed more basic and straightforward information on NTMs. The NTM Programme's reports are considered useful by the public sector and TISIs' representatives, although often lacking an analysis of the causes and context of the obstacles and conclusions and recommendations were considered as too vague and too general. 		<p>Recommendation 2: Expand the scope and depth of partnerships to ensure the required partners' engagement:</p> <ul style="list-style-type: none"> Externally, when a government requests an intervention, put in front the objective and mechanism for follow-up to attain commitment. <p><i>Responsibility for implementation:</i></p> <p><i>Trade and Market Intelligence Section with the active support and engagement of the responsible Section of the Division for Country Programmes</i></p> <ul style="list-style-type: none"> Internally in ITC, come out with a coordination approach during the design stage of the interventions in a consultative manner, involving senior management in coordination; design and communicate a transparent mechanism / protocol about the selection of follow up activities.
<p><i>TOAM</i></p> <ul style="list-style-type: none"> ITC's Trade Obstacles Alert Mechanism TOAM corresponds to the need of countries to develop online 		<p><i>Responsibility for implementation:</i></p> <p><i>Trade and Market Intelligence Section with the active support and engagement of the</i></p>

Findings & Evidence	Conclusion	Recommendations
<p>platforms enabling public / private sectors interaction to identify NTM-related obstacles and monitor their resolution. However, its usability is fundamentally linked to users' access to internet.</p> <ul style="list-style-type: none"> The approach at the core of TOAM to associate a network of institutions, accountable for resolving the obstacles, is a competitive advantage, while other similar platforms have no such mechanism or only possess a focal point in each country. 		<p><i>responsible Sections of the Division of Markets and of the Division of Enterprises and Institutions</i></p>
<p><i>International Context</i></p> <ul style="list-style-type: none"> The 2013 World Trade Organization (WTO) Trade Facilitation Agreement (TFA) sets an international context in which ITC's NTM Programme finds an important reinforcing role towards facilitating the TFA's implementation. 		
<p><i>Countries involved</i></p> <ul style="list-style-type: none"> Considering the donors' and ITC's priority portfolios, the sample of countries involved in the Programme is well balanced. 		
<p><i>Partnerships</i></p> <ul style="list-style-type: none"> The Programme's management team was able to develop good partnerships with external organizations to leverage results. However, the ITC internal coordination between sections and offices has not fully met expectations. 		
<p><i>Innovation and replicability</i></p> <p>The exhaustive analytical approach used to implement the Programme highlighted the business perspective of NTMs, which in itself renders it innovative, even more in comparison to traditional, more legally oriented approaches.</p> <p>TOAM, the NTM-related online platform, is by definition an innovative element of the Programme. It was deployed in two of the targeted countries and revealed to be an effective ICT tool for public-private sectors' communications</p>		

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<p>and exchanges on NTM. Other online elements of the Programme (e.g. the databases) demonstrate the willingness of ITC to implement of the Programme using innovative solutions.</p> <p>A potential innovative component that would have been important to integrate in the Programme but was not, relates to the multinational dimension of trade. It would have been interesting to make sure that issues related to bilateral, regional and international trade be central to the Programme.</p>		
<p><i>Human Rights and Gender Equality</i></p> <p>Although not specifically stated in the Programme design, human rights and gender elements were integrated in its implementation through the memorandums of understanding signed with the stakeholders. For example, the survey questionnaires generated gender sensitive data.</p>		
Effectiveness		
<p><i>Results</i></p> <ul style="list-style-type: none"> The Programme has been extremely effective in developing and deploying a robust method to identify and analyse NTMs from the business sector perspective. The European Commission has adopted the method for the identification of NTMs in the EU market. At the country level, the Programme has contributed to the enhancement of a national surveying companies' capacity in conducting broad, in-depth survey processes linked to NTM and related topics. Private sector service providers' capacity has also been enhanced in terms of data analysis. Hence, the quality of the data generated is considered high. With a few exceptions, the Programme has not transferred knowledge and capacity to ITC's usual 	<p>The Programme has been effective in contributing to shape NTM analytical methods, which are today commonly accepted and used in particular in the multilateral trade community.</p> <p>Beyond this notable achievement at the multilateral level, there are two main angles that can be used to assess effectiveness in the present evaluation:</p> <p>Firstly, there is the accountability of the Programme management towards the donors, i.e. the management's compliance with the contents of the MOUs signed between the ITC and DFID. On this basis, the evaluation considers that</p>	<p>Recommendation 3: Consider using the information and data already collected and aggregated and conduct deep solution-oriented analysis to mitigate the negative effects of NTMs on SMEs and improve their international competitiveness:</p> <ul style="list-style-type: none"> Solution-oriented analysis could focus on specific regions, potentially where TOAM or the surveys have been conducted most recently, for more chances of success. Conducting such an exercise would create a momentum to bring back and converge the

Findings & Evidence	Conclusion	Recommendations
<p>target beneficiaries (policy makers, TISIs and academia) in terms of conducting NTM-related surveys and analyzing NTM data.</p> <ul style="list-style-type: none"> Although government institutions have gained important knowledge where the Programme's reports have been fully developed, stakeholders linked to NTM related issues have not been sufficiently involved to clearly set a context in which actions would contribute to removing NTM trade obstacles. The Programme has been effective in the technical implementation of TOAM, including the training of enterprises to use it. However, it has faced challenges in obtaining the required level of commitment and representativeness of the institutions participating in it. In addition, TOAM was deployed only in two countries. <p><i>The Reports & the Database</i></p> <ul style="list-style-type: none"> As mentioned in the relevance section, the reports generated through the survey's component of the Programme were not uniformly user-friendly (the SMEs considered them too strategic) nor detailed (the government and TISIs representatives would have appreciated more forward looking and problem solving analysis), relied too heavily on statistics and came too late in the implementation process to really be useful. In some countries, the reports were not developed. Overall, the updating of the NTM Programme's database was not frequent enough and the new information integrated was not sufficiently detailed to really be useful for stakeholders. There were in addition issues with the timeliness and accuracy of the data presented on the database. Nonetheless, there is an overall increasing trend in web traffic in the database. The Programme has faced shortcomings in terms of disseminating information and data generated, whether in the form of reports or through database. 	<p>the work accomplished broadly met the requirements; this refers in particular to MOU 1 components 1 and 2 outputs.</p> <p>Secondly, although much work has been put into its implementation, with immense dedication, the fact remains that these efforts have not been organized around a coordinated approach towards more strategic objectives. This has hindered its potential for good higher-level results to materialize. What is more, the results that have been reached have limited chances of being sustained overtime</p> <p>In terms of development, there is the longer-term vision related to the performance of the intervention strategy to support partners and beneficiaries to improve their own conditions and actions, as it is legitimate to expect of such a full-fledged programme; this refers in particular to shortcomings in achieving intermediary outcomes as identified in the theory of change .</p> <p>When agreeing on the MOU 2, the theory of change was not developed which would have pushed the Programme managers to think how outputs (immediate results) would have complemented each other to then achieve outcomes (intermediate results) and contribute to SMEs international competitiveness.</p>	<p>attention of all stakeholders previously involved in the Programme.</p> <ul style="list-style-type: none"> A meta-study that could be developed using aggregated national data to a regional and even global level would be of particular interest of all stakeholders, of all types, involved in that specific GVC. There is also an opportunity to involve the private sector but from the high end of the GVCs: they could eventually even finance some of these activities through impact investment and through their Corporate Social Responsibility (CSR) branches, but also for the well-being of the GVC itself and their own profitability. <p><i>Responsibility for implementation:</i></p> <p><i>Trade and Market Intelligence Section with the active support and engagement of the Chief Economist and Export Strategy Section and the Sustainable and Inclusive Value Chains Section</i></p> <p>Recommendation 4: Consider the replication of TOAM and the use of data generated to address NTM related obstacles:</p> <ul style="list-style-type: none"> Replicate the TOAM deployment in other countries and regions in addition

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<p>Thus, although in many cases, quality data has been produced, it did not always reach the target audience.</p> <p><i>Actions</i></p> <ul style="list-style-type: none"> • Actions to be taken on the basis of the information generated through the Programme have been defined in certain circumstances and in a few context, projects have been financed (by ITC and other donors) to address trade obstacles identified by the Programme. However, although the Programme has fulfilled the commitments the ITC made to the donor, it has not uniformly fostered actual consistent and relevant follow up on strategic information it helped generate. 	<p>In other words, although some interesting outputs have been achieved, including specific tools for the use of all stakeholders, at the outcome level, too little was accomplished and/ or followed-up on to generate a satisfactory level of results. The bulk of what has been achieved does not pave the way for stakeholders to take action and resolve NTM issues faced by the trading private sector.</p> <p>During the design phase, the thinking revolved around how to get things done, which shows good management. However, this led to a situation where less strategic planning than needed was incorporated in the design phase but also during implementation. Lessons learned were integrated into how to better implement the same activities.</p> <p>Only slowly and somewhat late did the Programme evolve into a more structured setting.</p>	<p>to supporting the follow up on the two that have already been deployed.</p> <ul style="list-style-type: none"> • Ensure that action plans are developed, that they are implemented and that ITC keeps its momentum and positioning in finding solutions to the NTM related issues. <p><i>Responsibility for implementation:</i></p> <p><i>Trade and Market Intelligence Section with the active support and engagement of the responsible Section of the Division for Country Programmes</i></p> <p>Recommendation 5: Consider TISI- and enterprise-specific actions in initiatives to mitigate NTM related obstacles:</p> <ul style="list-style-type: none"> • Develop tailored follow up action for TISIs and enterprises, in conjunction with relevant in-house expertise; to identify relevant interventions. <p><i>Responsibility for implementation:</i></p> <p><i>Trade and Market Intelligence Section with the active support and engagement of the Chief Economist and Export Strategy Section and the Trade and Investment Support Institution Section</i></p>
Efficiency		
<p><i>Leveraging Financial Resources</i></p> <ul style="list-style-type: none"> • The Programme was able to generate sufficient interest in its context to mobilize important financial support 	<p>The Programme has generally speaking met the requirements of the donors, although the monitoring system appears</p>	

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<p>from other donors, all the more for its phase 2, which was more forward looking and action driven.</p> <ul style="list-style-type: none"> With the financial contribution by its main donor, the Programme efficiently reached and even surpassed some of the pre-set targets presented in the MoU signed with the donors. Overall, the NTM Programme's outputs have been delivered in a cost-effective way. However, some reports have not been fully finalized, there is a shortcoming concerning other targets. 	<p>insufficient and prevents an in-depth analysis of the cost-efficiency of the programme.</p> <p>Addressing the negative effects of NTMs requires a multi-player engagement and multi-layered strategies, which design and management go beyond the capacity of a single ITC technical Section, whatever technically competent and operationally efficient it might be in delivering good quality outputs.</p>	
<p><i>Human resource development</i></p> <ul style="list-style-type: none"> The Programme has enabled the constitution in ITC of a skilful team combining multidimensional expertise in non-tariff measures, training of partners on survey and interview, and competencies for data quality control and report drafting. 	<p>As the Programme evolves from a pilot technical project into a full-fledged strategic Programme, resource management requires the ability to adapt and change resource commitments as situations evolve and a management function with the capability, understanding and authority to maximize effectiveness and ensure sustainability towards (possibly evolving longer-term) outcomes.</p>	
<p><i>Management of resources</i></p> <ul style="list-style-type: none"> While it seems that management objective was to cover as many countries as possible, not sufficient funds were secured to make sure that the actions related to the data generated by the Programme would actually be implemented into solutions owned by partners and beneficiaries. Moreover, the funds allocated to the implementation of intermediate outcome 2 targets (enhanced capacity of decision-makers to take actions to overcome NTM barriers) were not managed efficiently as Programme management lacked the capability, understanding and authority to coordinate with other ITC Sections. 	<p>(See recommendation 2 above and recommendation 6 below)</p>	
<u>Sustainability</u>		
<p><i>Ownership</i></p> <ul style="list-style-type: none"> For many of the beneficiaries—all the more from the private sector, who were mostly only involved through the survey—the lack of ownership over the Programme's results have led to less than expected 	<p>There was not sufficient overall logic linking all components and stakeholders of the Programme to allow for buy-in and ownership over the Programme. Although during implementation, the management team endeavoured to retroactively fill the</p>	

Findings & Evidence	Conclusion	Recommendations
<p>sustainability prospects for the Programme results. Such is also the case for the survey service providers whose newly acquired know-how seems to have little chances of being reused if there is no follow-up demand for these types of services. However, many of the public sector representatives, mainly the policy makers, did have some ownership over the Programme. Circumstantial elements such as the WTO TFA help increase the buy-in from these stakeholders.</p>	<p>gaps, the context in which coordinated work would have perpetuated the results achieved over time did not materialize.</p> <p>The decentralized implementing structure—e.g. conducting the surveys through the survey companies at the national level—had the positive effect of transferring knowledge to these partners. However, as much effort was put into these activities, it seems that this arm’s length approach between the ITC and other stakeholders—e.g. the TISIs and private sector representatives—did not foster interest for additional surveying exercises to be conducted or for actions to be taken on the basis of the data. This is also partly because not all stakeholders felt the outputs of the Programme were sufficiently tailored to their profiles and needs. Interactions between the different types of stakeholders were only minimal, except in the case of TOAM which main objective is to actually stimulate dialogue. (See recommendation 6)</p>	
<p><i>Strategic Planning</i></p> <ul style="list-style-type: none"> One of the most important cause of the lack of foreseen sustainability of the results achieved through the Programme is the lack of strategic planning at its design phase which would have taken into account the needs and functions of the different categories of beneficiaries that could have acted as multipliers and implementing partners (mainly policy makers and TISIs). The Programme entered into implementation with outputs as objectives—trained survey service providers, surveys conducted, reports developed and 	<p>The Programme executed what was planned through an effective approach: each activity was rigorously implemented, as in a research effort. Nevertheless, it seems that the objective was to cover as many countries as possible, without the needed in-depth considerations in each country to ensure that follow-up efforts lead to buy-in. There was not enough follow up by the Programme, with each of the stakeholders, to ensure they would continue working towards the overall</p>	<p>Recommendation 6: In the successive phase of the Programme, consider integrating the Programme into the overall ITC programming and management</p> <ul style="list-style-type: none"> In the successive phase, the rich, technical and research-driven approach of the NTM Programme should be streamlined into a solid, longer-term programmatic perspective, including the identification of complementarities with the other agency’s Sections. This

Findings & Evidence	Conclusion	Recommendations
<p>workshops organized. Initially, there was neither a longer-term perspective of what these outputs were supposed to accomplish from the implementing partners' perspective, nor an exit strategy defining mutual expectations discussed and agreed upon. With a few exceptions, the Programme did not include in its approach the support to local knowledge networks. As noted above, the ToC was retrospectively developed, including during the evaluation process.</p> <ul style="list-style-type: none"> • TOAM is a relatively sustainable tool that is designed to operate outside of ITC intervention. Nevertheless, sustainability prospects are somehow limited by the decreasing level of use. 	<p>objective of reducing the negative effects of NTMs for the private sector and more specifically, the SMEs.</p> <p>One of the comparative advantages of the Programme was that it was designed with businesses in mind. Yet looking back, what did the businesses get out of this Programme? It seems that consideration for the private sector, as the main beneficiary was lost along the way.</p> <p>As already mentioned, the Programme is considered as innovative by the evaluation. It was a research-driven Programme, which allowed it to integrate new approaches in the endeavour of tackling NTMs. However, in this context, a more strategic programmatic approach should have accompanied the implementation, which would have allowed for longer-term perspective to be integrated.</p>	<p>would entail integrating the Programme into the overall ITC programming and management.</p> <ul style="list-style-type: none"> • As already mentioned, the survey companies have acquired the needed knowledge to replicate the NTM surveys. However, without demand for replication, the knowledge will be lost. Therefore, in parallel, it is important to continue looking for funds to implement specific projects to render actionable the contents of the reports already generated. <p><i>Responsibility for implementation:</i> <i>Trade and Market Intelligence Section, with the active support of the Strategic Planning, Performance and Governance Section</i></p>
<u>Impact</u>		
<ul style="list-style-type: none"> • The lack of strategic planning coupled with the initial focus on outputs led to a situation where the Programme's contribution to impact level results have not materialized. In a limited number of occasions, some stakeholders did develop concrete ownership over some tools built through the Programme. Perspective for some impact has been noted, mainly through public-private sector transparency and dialogue mechanisms. Knowledge and awareness enhancement for public stakeholders and international community is observed. 	<p>Based on the findings from the other criteria, the chances of the Programme actually "enabling policy makers and other national and international stakeholders to take concrete actions to overcome regulatory and procedural trade obstacles that are a concern for small and medium-sized enterprises" are low. In this context, there is very limited evidence that the Programme has contributed to improving international competitiveness of SMEs in developing countries and transition</p>	

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Findings & Evidence	Conclusion	Recommendations
	economies in an inclusive and sustainable manner. (See all recommendations)	

Based on all the information collected and analyzed during the evaluation process, the evaluation rates:

Overall performance: 4 – *Moderately Satisfactory*

Relevance: 4 – *Moderately Satisfactory*

Effectiveness: 3 – *Moderately Unsatisfactory*

Human Rights and Gender Equality: 5 – *Satisfactory*

Efficiency: 4 – *Moderately Satisfactory*

Sustainability: 3 – *Moderately Unsatisfactory*

Innovation and replicability: 6 – *Highly Satisfactory*

Potential for Impact: 3 – *Moderately Unsatisfactory*

Technical suggestions to the attention of the Trade and Market Intelligence Section

- XIII. **NTM Survey** – (a) At the survey design stage, consider capacity-building needs for the implementing partners in case of technical insufficiency. (b) Enhance the communication and product dissemination activities, including publishing the NTM report rather soon after the stakeholder workshop, in order to keep the momentum and ensure data validity.
- XIV. **NTM Database** – (a) For effectiveness but also efficiency purposes, use current, updated data collected through the surveys to cross-inform the NTM database, and vice versa. This would enhance the internal logical structure of the programme and increase the potential for dissemination of the relevant data generated through the Programme. (b) Design and deploy a monitoring, feedback, and communication system in order to reflect and promote the utility of the database, especially to the enterprises. Based on the user feedback, to adjust the database's functionalities, update frequencies, or to consider stop ITC's data collection activities and extract data from partner organizations. (c) Developing an ITC specific database has its advantages. However, it is worth reassessing the partnership model and leveraging on other existing databases, for example sharing the UNCTAD database, and focusing on disseminating the data with an enterprise friendly approach.
- XV. **TOAM** – Engage and use existing national coordination platform to enhance the problem solving aspect of TOAM; the National Trade Facilitation Committee can be a potential partner, as it has a legal obligation to report on the progress of TFA implementation, therefore enhance the incentive for national governments to maintain this tool for monitoring purpose and to solve the obstacles reported, particularly procedural obstacles
- XVI. **Services** – Pursue work specifically in the services sector.
- XVII. **NTM Programme successive phase** – conduct a mid-term review. In this Programme. Such a review could have been conducted between phases 1 and 2, this would have surely helped push forward the development of a solid theory of change earlier on.

Lessons Learned

- XVIII. It is important to empower the stakeholders through a network to afterwards hand them over the capacity to perpetuate the work initiated by the Programme. Empowering them means creating links between them. As an example, the countries where TOAM was deployed seem to have generated more links between the public and private sectors than in other countries.
- XIX. Developing the reports by sector was an interesting and useful approach. However, the data collection as well as the reports themselves focused on the national level. To a certain extent, this hindered the potential for a more geographical approach (bi-national and tri-national as well as regional trade contexts). Trade occurs between countries. Had the Programme involved more than one country to discuss a specific set of pre-identified NTMs, potentially more concrete and sustainable results could have been achieved, as exemplified in the case of regional survey in Arab States. Another example relates to TOAM deployment, which was one of the interesting and important results of the Programme. The involved countries found the tool interesting but mentioned it would have been more useful if it would have been shared with neighbouring countries. It is clear that such an approach complicates the implementation of such a Programme. A reduced scope—less beneficiary countries—with more in-depth work could have led to interesting, innovative and multinational solution seeking efforts.
- XX. In terms of financial data, it is important to manage and classify it in an orderly manner. This serves for monitoring purposes and obviously for evaluation use. In the present case, expenditures by components had to be estimated.

Conclusions

- XXI. The Programme has been a very innovative in developing high quality tools and products. It has contributed to shape the analytical methods used by the multilateral trade community to understand NTMs from the business sector perspective and has also substantively contributed to broaden and enhance ITC human and technical skills.

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- XXII. Despite excellent achievements, under the present management architecture, the Programme does not gather the sufficient ITC resources to ensure stakeholders' engagement for carrying out impact. Addressing the negative effects of NTMs requires a multi-player engagement and multi-layered strategies, which design and management go beyond the capacity of a single ITC technical Section, whatever technically competent and operationally efficient it might be in delivering good quality outputs. As the Programme evolved from a pilot technical project into a full-fledged strategic Programme, it would have required an organically embedded management and coordination function with the required capability, understanding and authority to adapt and change resource commitments as situations evolve and ensure the contribution of other ITC specialized services. These services include the support to ITC traditional stakeholders (governments, TISIs and enterprises), services specialized in technical fields necessary for follow up activities, such as quality and trade negotiations, and last but not least, those services focusing on country intelligence and country guidance.
- XXIII. More fundamentally, this evaluation raises the issue of ITC's *savoir faire* in managing the life cycle of a successful innovative donor-supported pilot technical project into a more strategic and integrated corporate solution, as this pilot technical project becomes more mature and with higher potential in terms of development impact.

1. Introduction

1.1. Programme Background and Components

1. The Non-Tariff Measures (NTM) Programme (2010-2016) has been managed by the International Trade Centre's (ITC's) Market Analysis and Research Section (MAR)¹ within the Division of Market Development (DMD). Its aim is to address the costly trade barriers resulting from NTMs and related procedural obstacles (POs) to trade in goods and services through increased transparency and initiatives aimed at mitigating identified barriers. The beneficiaries of the NTM Programme include exporters and importers, Trade and Investment Support Institutions (TISIs), policy-makers and researchers from developing countries around the world (see Annex 4² for the complete list of countries that participated in the Programme).
2. The ITC launched the NTM Programme (phase 1) within the framework of the first Memorandum of Understanding (MOU) signed in January 2010 with the Department for International Development (DFID)³. The Programme would collect, classify and disseminate relevant information on NTMs that would support better decision making for ITC's clients. The relevant information includes NTMs and related procedural obstacles that trade companies face when complying with these measures. In September 2013, a second MOU was signed with DFID, extending the Programme until October 2016 (Phase 2)⁴. As a result, DFID provided GBP 1.65 million (around USD 2.6 million) to the NTM Programme under Phase 1 and GBP 2.69 million (around USD 4.3 million) under Phase 2. With the two additional components included in second MOU, the ambitions of the initiative evolved into a full-fledged Programme.
3. The Programme was designed following a 2009 pilot project, which consisted in establishing an international taxonomy of NTMs and running business surveys to test the classification. The surveys revealed potential to collect business perspectives on NTMs and related trade obstacles. It was decided to further develop the survey methodology and roll out the updated NTM surveys under a new Programme that would also collect government regulations on imports and exports and the design of a web-based application to disseminate data. During the period under evaluation scope, the Programme has incrementally developed from an innovative pilot technical project focusing on NTM nomenclature and statistical issues, into a full-fledged programme ultimately aimed at supporting Programme stakeholders to mitigate the negative effects of NTMs.
4. The NTM Programme developed in May 2013 a Programme Plan covering a period of three years between July 2013 and June 2016 (phase 2). Under the 2013 Programme Plan, the NTM Programme is sub-divided into four components. Components 1 and 2 of the Programme Plan built on the contents of the first MOU with DFID (January 2010):
5. Component 1, NTM Data. It is based on the collection of NTM data/requirements on specific markets/countries and on their dissemination through a database on the Market Access Map⁵. Its outcome as defined by the Programme is: Enhanced enterprises' knowledge NTMs to access specific markets; although NTM information is also of the interest of other type of stakeholders (policy makers, TISIs and academia).
6. Component 2, NTM Surveys and Related Analyses. This component is centred on the realization of national surveys with enterprises, which give rise to national or regional analysis.

¹ The Market Analysis and Research Section (MAR) has been renamed as Trade and Market Intelligence (TMI) in the organizational reconstruction in 2016.

² As there were numerous annexes, a volume 2 for the evaluation has been developed integrating all annexes.

³ This MOU also gave rise to the Women and Trade Programme.

⁴ The programme implementation of Phase II was continued until December 2016.

⁵ Market Access Map (<http://www.macmap.org/>) has been developed by ITC. It is a database, which supports the needs of exporters, importers, trade and investment support institutions, trade policy makers and academic institutions in developing countries. It provides information about customs tariffs (including tariff preferences) applied by more than 200 countries and faced by 239 countries and territories, and NTMs for 90 countries

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The outputs of this component are namely: 'local survey experts trained on survey methodology and classifications', 'policy makers are provided with an in-depth analysis of the business perspectives on NTMs', 'Stakeholders workshops', 'Regional analysis', and 'Report published to document business concerns with NTMs and/or regional analyses'. Its outcome is: Increased capacity of Policy Markers in Programme countries and regions to, 1) understand NTM-related trade obstacles that are faced by the business sector and 2) formulate concrete recommendations to overcome them.

7. Components 3 and 4 were added in the second MOU (September 2013) and aimed at generating consensus among trade stakeholders around potential actions as solutions to NTMs and support their implementation:
8. Component 3, Initiatives to mitigate NTM-related trade obstacles. The outcome is: Enhanced business environment through the implementation of initiatives to overcome trade obstacles identified in components 1 & 2. Component 3 is centred on the validation of a matrix of action, based on the NTM survey results and including a prioritization of recommendations, on the identification of relevant organizations able to address the identified issues, on the dissemination of action matrices, on scoping direct or indirect assistance provided by ITC and on the design and implementation of ITC's 'follow-up' assistance at the national and regional level⁶.
9. Component 4, Services trade regulations⁷. The outcome is: Increased understanding and use of key international organizations of the taxonomy for services trade regulations. It relies on the development of a taxonomy for services trade regulations, on the development of a survey methodology and on the implementation and analysis of pilot national surveys.

1.2. NTM Programme approach to NTMs

10. NTM is a neutral concept that can be defined as: "policy measures, other than ordinary customs tariffs, that can potentially have an economic effect on international trade in goods, changing quantities traded or prices or both."⁸ Although NTMs may be applied for legitimate reasons, such as protection of human, animal and plant health, they can also cause impediments for businesses and become burdensome if applying too strict. The NTM Programme has adopted a business-minded approach, focusing on the obstacles related to burdensome NTMs and identifying three main aspects where challenges are posed to enterprises:
11. Regulation: the regulation itself can be restrictive, thus posing difficulty to comply with by enterprises. The regulations can directly restrict the quantity of goods traded. Examples of such regulations include, requiring licenses, setting quota and prohibiting certain products. They also comprise explicitly controlling the import price of products and foreign exchange, or implicitly adding costs through additional charges and taxes. Regulations can take many other forms such as impediments along the value chain and trading process, privileges given to certain economic operators, preferential tariff rates applied to certain country of origin and adherence to high technical standards.
12. These regulations are mostly introduced by importing countries, but measures can also be applied by countries to restrict their own exports, for example through export license and export quotas, for various policy objectives.
13. This type of challenge, if considered intentionally designed to bypass the principle of free trade and to protect domestic industry, is commonly referred as Non-Tariff Barriers (NTBs); nevertheless, the Programme chose to use the neutral term NTM, as policy measures can also

⁶ This component includes the Trade Obstacles Alert Mechanism (TOAM). See below for more details.

⁷ Although this component is included in the 2013 Work Plan, it has not been fully developed by the Programme due to funding reasons that are developed in the chapter on efficiency. As a result, this component is not being addressed by the evaluation.

⁸ UNCTAD, International classification of non-tariff measures (2012 version), http://unctad.org/en/PublicationsLibrary/ditctab20122_en.pdf, p.1

be in place to advance legitimate policy objectives, such as health and environmental protection, which is often difficult to differentiate from protectionist purposes. This type of obstacles is therefore referred to as burdensome NTMs or NTM-related obstacles by the Programme.

Box 1: Multiple Classifications of NTMs

The first Multi-Agency Classification of NTMs was finalized in November 2009 (and updated in February 2012) by a group of experts from the Food and Agriculture Organization, the International Monetary Fund, the International Trade Centre, the Organization for Economic Co-operation and Development, the United Nations Conference on Trade and Development, the United Nations Industrial Development Organization, the World Bank and the World Trade Organization.

For the purpose of the NTM Programme survey, ITC internally developed a simplified version of the NTM classification as well as a classification of Procedural Obstacles (POs), which were both finalized in the same document in February 2010 (updated in January 2012 and February 2015). In terms of the chapters describing NTMs, although the reports before 2012 presents the Multi-Agency classification in its Appendix, the NTMs were coded in the survey database and presented in reports published after 2012 using the internal classification of NTMs.

The classification of POs contains nine chapters and sub-branches for each chapter, which go up to the second digit level. Contrary to the NTM chapters, this classification does not contain definitions or examples of the POs to be classified within each chapter or within each sub-branch.

14. Procedure: besides the regulations per se, obstacles can also occur due to the procedural complexity to implement the regulation. These commonly appeared obstacles include lack of information or inconsistent information regarding the regulations, large number of documents required and for multiple agencies, delay during the administrative and transportation process, unusually high fees and bribery requested, arbitrary behaviour of officials etc., which can add on further burden to comply with the regulations. This type of obstacle is referred to as *procedural obstacles (POs)* in programme activities.
15. Infrastructure: enterprises also face challenges related to the overall business environment, preventing them from operating efficiently and meeting NTMs, both domestic regulations and requirements in foreign markets. These could be limitations in hard infrastructure, such as testing facilities, public transport systems, access to information and communication technology; or soft infrastructure in the legal systems, for example dispute settlement systems, recognition of certifications etc. These insufficiencies can be related to administrative processes, which appear similar to procedural obstacles, but unrelated to a specific regulation. This type of challenge is described as *trade-related business environment (TBE)* in programme activities.
16. For the purpose of Programme activities, ITC adjusted the classification (see Box 1 for more background) to better reveal the situation faced by the enterprises.⁹ This adaptation is mainly differentiating the technical regulations from their conformity assessment requirements, to reflect the different steps in complying with the regulations: first by meeting the requirements, second proving compliance. In addition, ITC further developed the classification for procedural and business environment related obstacles. It gives a holistic picture of the practical challenges faced by private sector in complying with the NTMs.
17. Closely related to NTMs for goods are the measures for services. In essence, all limitations to services trade are “non-tariff”, as services restrictions mostly apply “behind-the-border”, which

⁹ The complete classification used by the programme can be found in Annex 9.

makes tariff charging while “crossing a border” nearly impossible.¹⁰ However the understanding for the topic is still limited, due to “the absence of a fully developed and commonly agreed product nomenclature”.¹¹ The programme’s approach of developing a services trade taxonomy was also spot on.

1.3. Theory of Change

18. The programme matured its theory of change (ToC) during the implementation period. The Programme only developed a ToC in September 2016 at the end of phase 2, covering the future direction of the programme from 2016 to 2021. Components 1, 2 and 3 were integrated as programme outputs at different levels of intervention.
19. To cite the ITC draft Evaluation Guidelines 2017:
 - “If the project ToC was not followed, or if it was not created at the early stages of the project, the ToC should be reconstructed. This is particularly important to evaluate a policy or a corporate process for which a specific policy or strategy document is not available as a main reference for evaluation. Should this be the case, it is important to bear in mind that the pathway to policy, process or project results is the core of the theory. If the initial ToC was not followed, it will be the task of the evaluation to: determine why the ToC was not followed; reconstruct the ToC the project was implemented upon; and determine the accuracy and relevance of the identified theory.”
20. During the inception phase of the evaluation, the project’s ToC was reconstructed by the programme, and further revised during the present report drafting phase. The ToC provides a background upon which the evaluation relies although in many cases, the MoUs signed with the donor are the main references on which the evaluation relies. Figure 1 below presents the project using the standard ITC results framework structure, which is followed by the detailed ToC, with a focus on how the evaluation understands the project.
21. ITC’s Programmatic Approach, is comprised of six focus areas, one of which is “Providing Trade and Market Intelligence”.¹² It is in this focus area where the NTM Programme is positioned. With a view of the overall ToC of ITC’s corporate results framework, the focus area, and hence the project, is positioned to support ITC’s corporate objective of increasing the international competitiveness of small and medium-sized enterprises (SMEs).

¹⁰ WTO, World Trade Report 2012, https://www.wto.org/english/res_e/booksp_e/anrep_e/world_trade_report12_e.pdf, p.73.

¹¹ WTO, 2013, Global value chains in a changing world, https://www.wto.org/english/res_e/booksp_e/aid4tradeglobalvalue13_e.pdf, p.76

¹² International Trade Centre, 2016. Operational Plan 2016, page 8. Available at: http://www.intracen.org/uploadedFiles/intracen.org/Content/About_ITC/Corporate_Documents/ITC%20Operational%20Plan%202016.pdf

Figure 1: NTM Programme Theory of Change within the ITC results framework

Impact: Highest level goal:	ITC's contribution to the SDGs: SDG 2.b, SDG 17.10, SDG 17.12¹³.			
Impact: Related to ITC mandate (<i>raison d'être</i>):	The international competitiveness of SMEs in developing countries and transition economies is improved in an inclusive and sustainable manner by: Enabling policy makers and other national and international stakeholders to take concrete actions to <i>enhance inclusiveness and sustainability of trade</i>			
Intermediate outcomes	Increased stakeholders' common understanding of SME's concerns with regulatory and procedural trade obstacles (Component 1 & 2)		Enhanced capacity of decision-makers to take actions to overcome the identified NTM barriers (Component 3)	
Immediate outcomes	1. Enhanced awareness and interest: Partners develop an interest in SME concerns with non-tariff measures (NTMs).	2. Improved knowledge, skills and exchange: Partners better understand the impact on SMEs of their decisions related to regulations and associated procedures	3. Strengthened consensus and feasible plans to act: Partners develop a collaborative approach, options to overcome regulatory and procedural trade obstacles without compromising the legitimate objective of measures	4. Strengthened Mechanism to Coordinate Actions: Partners use effective tools and mechanisms to develop common solutions to mitigate regulatory and procedural trade obstacles and improve support to SMEs on how to deal with NTMs.
Outputs	<ul style="list-style-type: none"> • NTM Surveys conducted • Awareness raising events organized • Relevant websites regularly updated with most recent NTM data (including ITC publications) • Functioning trade alert system developed 	<ul style="list-style-type: none"> • Trainings and workshops on NTMs conducted • Advisory services provided to relevant national service providers • Customized research and analysis conducted on NTM data generated by the Programme • Reports developed and disseminated • Stakeholder meetings and consultations organized • Functioning trade alert system developed 	<ul style="list-style-type: none"> • Reports developed and disseminated • Stakeholder meetings organized for consensus building on reports developed • Concept notes / project plans / action plans / initiatives designed to address regulatory or procedural trade obstacles 	<ul style="list-style-type: none"> • Functioning trade alert system developed • Advisory services & capacity building related to the implementation of the trade alert systems provided • Institutional problem-solving mechanism implemented (in cooperation with other ITC programmes)

¹³ See Annex 1 for details on SDGs covered.

Impact: Contribute to improve the international competitiveness of small and medium-sized enterprises by enabling policy makers and other national and international stakeholders to enhance inclusiveness and sustainability of trade

22. At the highest impact result level, the Programme has been designed to enable actors (mainly decision makers at the national, regional and multilateral levels as well as providers of trade-related technical assistance (TRTA)) to affect the inclusiveness and sustainability of trade-led growth in developing countries and transition economies. The rationale was that providing transparency on NTM issues would allow these actors to address the identified obstacles faced by SMEs. In turn, this reduces trade costs implied by NTMs and related procedures. In this more conducive environment, SMEs can expand their export and import activities and ultimately, contribute to a more inclusive and sustainable development. Thus, by design, the Programme would have an indirect influence at the impact level—the conducive environment. The programme’s contribution is but one amongst many other influencing actors/factors.

Logic

23. To contribute to impact, the programme has evolved to a structure with a two intermediate outcomes’ strategy and four immediate outcomes approach (see above logic model).
24. It is important to take into account that the Programme has matured its high-level objectives throughout the period under evaluation (2010-2016). Starting with a research pilot project that developed the NTM taxonomy (2009-2010), the emphasis of phase 1 (2010-2013) was in principle only focused on raising awareness and knowledge of stakeholders and beneficiaries on NTMs, which corresponds to the first intermediate outcome. The objective was to generate and disseminate information and data on NTMs and trade obstacles faced by SMEs. The latter were involved through their participation in national surveys. The data dissemination was principally oriented towards decision-makers and TISIs. Although during phase 1, the Programme did include some concrete cases at the country level to address specific NTM-related obstacles,¹⁴ it is in phase 2 (2013-2016) that the second intermediate outcome,—and its related component 3—aimed at supporting the decision-makers and TISIs *to address* the identified NTM-related obstacles, was formally included in the programme approach. The ToC formally materialized in September 2016, at the end of phase 2.
25. The ToC identifies SMEs as a category of target beneficiaries. On the one hand, the programme aims at improving their knowledge on NTM barriers to enhance compliance and pave the way for their exporting and importing activities. On the other hand, at the impact level, the programme facilitates avenues for SMEs to voice their NTM-related barrier concerns through improving transparency at the country level. Similarly, the NTM programme is destined to play a decisive research role in supporting the international trading community by increasing knowledge and transparency on the importance of NTMs and related trade obstacles.

Assumptions:

26. Being the long-term goal, the programme designers assumed the countries have a continued commitment to address NTM-related barriers that prevent SMEs to trade on a competitive basis. By focusing on the advantages and benefits for the SMEs of trading in an environment as free as possible of NTM-related barriers, the programme would work towards ensuring this assumption would materialize.
27. A second assumption is that the political contexts would be and remain favourable enough to allow for the smooth and progressive mitigation of NTM-related obstacles and for better supported SMEs to address NTMs. The programme would only *contribute* to the impact level since stakeholders would also be responsible for the enhancement of the international competitiveness of SMEs in an inclusive and sustainable manner (impact result). This assumption is important because the NTM-related obstacles are normally derived from political decisions and government policies. The political context needs to be in favour of reducing protectionist measures. The risk linked to the assumption—the lack of political buy-in to

¹⁴ Such as the TOAM in Côte d’Ivoire and Sri Lanka STDF project, see below chapter 3.2.8 for more details

reduced NTM-related obstacles—was mitigated by the Programme by adopting a country demand approach; countries had to request that the surveys be conducted at the national level.

28. A third assumption is that the stakeholders and implementing partners (decision-makers, TISIs, SMEs and academia) would be committed to the objectives of the programme. To ensure this assumption would become reality, the programme would foster the different categories of stakeholders' involvement in the design and implementation of the programme. It was assumed that the implementation partners, as well as the beneficiaries involved, would develop buy-in of the new knowledge acquired by participating in the Programme, and ownership over the programme's deliverables and tools. Thus, the project management team was responsible for creating a context wherein stakeholders take part in the implementation process. Although this responsibility was not explicitly stated, it is clear that to reach higher-level results, stakeholders' commitment need to be fostered.

Intermediate outcome 1: Increased stakeholders' common understanding of SME's concerns with regulatory and procedural trade obstacles

Logic:

29. To increase SME export competitiveness by reducing the costs associated with NTMs and procedural obstacles, and thereby, enabling an increased participation of SMEs in trade, it is first of all necessary to empower stakeholders to gain awareness of the importance of NTMs in shaping trade and knowledge in this complex field. This was particularly the case at the beginning of the Programme when it was launched as a pilot initiative to design the nomenclature for NTMs, in collaboration with other international partners.
30. The logic of the Programme was to bring to light the NTMs as they affect production, post-production and trading activities for specific sectors or products. By generating this type of information, the Programme was to pave the way for a common understanding about how these measures, implemented by different institutions, interact with each other and affect businesses opportunities to trade. The idea was to raise awareness and stimulate interest of all stakeholders concerning SMEs' voiced concerned with NTMs (immediate outcome 1).
31. Considering partners and beneficiaries, the scope of NTMs covers a very wide array of institutions including many whose primary concern is not necessarily trade but which intervene in issuing measures that have an effect on trade. The primary interested institution in developing and maintaining this comprehensive knowledge of the obstacles is the Ministry of Trade whose role is central in enhancing trade and development. Businesses are also interested in being informed and understanding NTMs. TISIs have a lobby role defend SMEs' interests with national institutions and need to develop services to SMEs to support them in meeting market requirements and procedures. SMEs need to have access to information on NTM and be aware of the related challenges with good understanding of market requirements and related procedures. Immediate outcome 2 aimed at informing these stakeholders by, amongst other processes, inviting them to participate in workshops, involving them in trainings, producing reports on the basis on the data generated through immediate outcome 1 (i.e. the database and the surveys).
32. In terms of the instruments developed by the programme to achieve intermediate outcome 1, the Programme has developed the NTM Database—housed on the ITC website Market Access Map—, which identifies the NTMs used at the country level for products. In addition, throughout the period under evaluation, the Programme has developed or supported a limited number of alternative or complementary databases or enquiry tools aimed at offering guidance to enterprises.¹⁵ These tools were developed to increase SMEs' access to information on the NTMs they need to comply with and the related procedures they need to follow to access specific foreign markets and specific sectors.

¹⁵ Such as the Euro-Med Trade and Investment Facilitation Mechanism (TIFM) and Bangladesh Transparency in Trade Procedures, see below chapter 3.2.8 for more details

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33. The Programme completes this information with the NTM surveys at the country level that gather and organize the experiences and perspectives of importing and exporting enterprises for sectors and products. The operational framework followed for the implementation of the national surveys and analysis is described in Graph 1, below. The following steps determine the activities that shaped the path toward achieving intermediate outcome 1.

Step 1): The national surveys are conducted depending on requests by the beneficiary governments (the Programme is global and opened to all countries).

Step 2): A comprehensive register of active exporters and importers is compiled from various sources (e.g. customs data, official registers, membership lists of business associations etc.)

Step 3): Samples of the number of companies to be interviewed are statistically estimated and then selected.

Step 4): A national surveying company/ institution is selected and trained on the survey methodology and classification (designed by the ITC).

Step 5): Phone screens interviews are conducted with companies to determine if they are facing NTM-related obstacles to trade and if they are willing to participate in the survey.

Step 6): The trained survey companies/ institution conduct data collection through face-to-face interviews with exporting and importing companies that agree to participate during step 5.

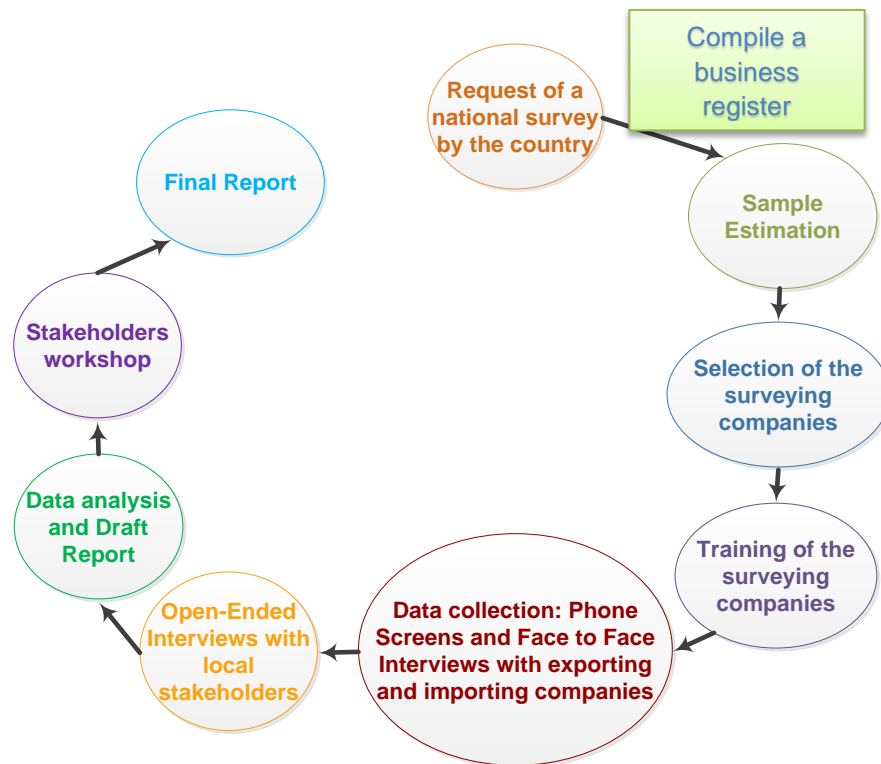
Step 7): ITC verifies the data quality throughout the data collection process and proceeds with preliminary data analysis.

Step 8): Open-ended interviews take place with key stakeholders to gather further contextual information.

Step 9): A draft report is prepared and preliminary findings are presented to local stakeholders in a workshop.

34. The NTM surveys also build into the intermediate outcome 2, which aims at enabling decision-makers to take actions to overcome the identified NTM-related barriers with the publication and diffusion of the final survey reports. The latter are published on the basis of the local stakeholders' comments and recommendations gathered during the workshop.

Graph 1: Operational framework for the implementation of the national surveys and analysis (Component 2)



35. The Programme also support this strategic outcome through a series of outputs and activities developed on a case-by-case basis and on specific occasions such as publications using ITC's trade intelligence on NTMs, events and training on NTMs.

Assumptions

36. For intermediate outcome 1 to be achieved, it is assumed that the data and information generated would be accurate and useful and would be updated regularly and continuously. The Programme also assumed that stakeholders would be interested in obtaining this data and coming together to better understand it, and have the means to access the information contained in the database, surveys and other programme products.

Intermediate outcome 2: Enhanced capacity of decision-makers to take actions to overcome the identified NTM barriers

Logic

37. Intermediate outcome 2 specifically targeted decision-makers to support them in conceiving and carrying out solutions to mitigate the difficulties identified in intermediate outcome 1. The logic of the Programme was to support partners (decision-makers and TISIs) to cooperate in identifying and agreeing upon possible coordinated solutions to overcome regulatory and procedural obstacles, without compromising the legitimate objectives of these measures; the ultimate goal (impact) being that these partners carry out the actions to mitigate the negative effects of the measures on business.
38. Since the causes to these obstacles are multiple, as demonstrated by the complexity of the NTM nomenclature, the solutions that need to be carried out to mitigate them often imply the coordinated intervention of several institutions, at country, regional and sometimes multilateral level. This is why the Programme aimed at building consensus amongst stakeholders and

Evaluation of the Non-Tariff Measures Programme

supporting them to work in a coordinated approach by developing plans to act in the form of concept notes and project plans (immediate outcome 3). The idea was to design coordinated solutions in the fields of:

- Regulations: that take aim at reducing the unnecessary or undue complexity of the regulations, at domestic level and at destination markets. These can be mainly involve the public sector;
 - Compliance: which address the constraints and the costs for enterprises to comply with these regulations. These can mainly be taken up with the support of TISIs and Government; and,
 - Infrastructure: that aim at reducing the inefficiencies related to 1) the poor design or lousy managed administrative processes, 2) the lack of instruments to access relevant information, and 3) the shortages of infrastructures and services that are necessary for enterprises to efficiently implement the requirements from an internationally competitive position.
39. Immediate outcome 4 paved the way towards achieving the impact level result as it aimed at developing arenas where stakeholders would be able to coordinate efforts, such as institutional problem-solving mechanism. Considering the actions to mitigate the negative effects of the measures on business, which is the desired impact of the Programme, they can be organized in the following four types of intervention areas, although they present some areas of overlap since the issues addressed are inter-related.
40. Projects addressing quality issues combine the support to actions undertaken by government and TISIs to help exporters meet Sanitary and Phytosanitary Standards (SPS) or Technical Barriers to Trade (TBT) regulations required by destination markets. Depending on its depth and coverage, an intervention could encompass a series of interconnected results: improvement at the inspection process stage (addressing functions such as Quarantine and Customs); enhancement of the capacity of the standard body on good regulation practices and on laboratory accreditation; improved ability of laboratory staff; better TISIs services to producers to understand and implement production and post-production requirements; and eventually, better aptitude of the producers themselves to implement the NTM-related requirements.
41. Projects focusing on enhancing transparency and dialogue support country stakeholders to establish and develop institutional mechanism to inform, dialogue, analyse and eventually, pave the way for reducing NTM-related obstacles at home country, particularly those related to procedural and institutional inefficiencies. The nature of these mechanisms is diverse. They can be intra-governmental boards involving the different government agencies competent to address the causes of the NTM-related trade obstacles. They often involve private sector representative organizations when dialogue and solutions require a concerted approach. In some cases, they also provide direct access for enterprises to voice their specific concerns and serve as a platform for identifying and implementing case-by-case solutions.
42. Projects concentrating on the improvement of the trading process aim at supporting governmental agencies and trading service providers to reduce transactions costs faced by enterprises at the different steps of the trading process. These projects address inefficiencies related to trade procedures as well as transport and logistics. Trade Facilitation projects aim at “the simplification and harmonization of international trade procedures”, where trade procedures are the “activities, practices and formalities involved in collecting, presenting, communicating and processing data required for the movement of goods in international trade”¹⁶ Single window initiatives are typical interventions that aim at enabling traders to submit regulatory documents at a single location and/or single entity. Single window projects involve a wide array of stakeholders including Customs, Ministry of Trade (in exporting and importing country to issue export and import permits), Quarantine, Board authorities for specific products

¹⁶ "Compendium of Trade Facilitation Recommendations", issued by UN/ECE (TRADE/WP.4/INF.91); published by UNCTAD: TD/B/FAL/INF.91.

(tea, tobacco, etc.), banks, Chamber of Commerce and insurance companies. Within the trading process, other projects encompass solutions related to the availability and time performance of testing laboratories and transport service providers (inland transportation, Port authorities and carriers).

43. Projects emphasizing the approach of negotiation aim at providing evidence of NTMs for policy makers to form national positions on a clear ground and to resolve trade conflict on an informed basis. These projects can help government to form clear negotiation positions through conducting studies and position papers, providing advisory services or holding trainings. These projects can also help better integrate the interest of private sector into the negotiation process, for example through holding public and private sector dialogues, conducting industrial surveys or studies. Apart from trade negotiation performed by the governments, projects can also enhance TISIs' capacity to advocate for business interest in foreign markets, through collecting evidence for the NTM-related obstacles and the origin of obstacles faced by the enterprises.

Assumptions

44. The main assumption made by the Programme to ensure intermediate outcome 2 would be achieved was that the involvement of stakeholders in the Programme would stimulate their longer-term coordinated commitment to eventually find solutions to NTMs and trade obstacles. This means that the Programme attempted at creating a context in which the stakeholders would continue working after the end of the Programme.

2. Methodology

2.1. Purpose, Objective, Scope and Audience of the Evaluation

45. The purpose of the evaluation is to assess, systematically and objectively, the NTM Programme design, performance and results. In alignment with the evaluation ToR, the objectives of the evaluation are to: (a) Assess performance and results of the NTM programme in line with the objectives stipulated in the two successive Memoranda of understanding (MOUs) and revised in other programme documents; and, (b) Generate learning and insights and provide recommendations for the successive phases of the programme.
46. To sustain its findings and conclusions, the evaluation aims at providing credible, useful, and practical information. In doing so, constructive and forward-looking recommendations have been formulated to inform the project donors (DFID, One UN, UNDP, EU, Canada) and the ITC. Additionally, it is hoped that the evaluation's results and recommendations will be beneficial for the project's beneficiary countries' government, as well as, in-country trade promotion organizations (TPOs), trade and investment support institutions (TISIs)¹⁷, Small and Medium-sized Enterprises (SMEs), and other stakeholders.
47. The evaluation covers the period from 01 January 2010 to 31 December 2016, which includes the two MoUs between ITC and DFID related to the support to the NTM programme.¹⁸ The evaluation uses the Organisation for Economic Cooperation and Development-Development Assistance Committee (OECD-DAC) evaluation criteria, including: relevance, effectiveness, efficiency, sustainability, and potential impact. The evaluation also examines cross-cutting dimensions where relevant within each of the evaluation criteria, in particular innovation, human rights and gender equality.¹⁹ In terms of Programme accountability, it is worth mentioning that

¹⁷ The project document refers to Trade Support Institutions (TSIs), however, during project implementation, the name used by ITC to refer to these institutions was changed to Trade and Investment Support Institutions (TISIs). For the purposes of this report, TISI will be used throughout.

¹⁸ The programme extended the phase 2 implementation for 3 months until December 2016, due to the delay of staff recruitment and the UN wide administration system Umoja deployment at the beginning of 2016. The extension was jointly decided by DFID and all programmes involved in ITC, including the NTM and Women & Trade programmes.

¹⁹ To cite the ITC draft Evaluation Guidelines 2017, the dimension of innovation, replication and scaling up "is to assess to what extent the intervention has introduced innovative approaches to achieve ITC's goals or to better adapt to emerging contexts, and the innovations have been replicated or scaled up by development partners"; and the dimension of human rights (HR) and gender

ratings represent a combined assessment of performance mainly against the theory of change and incidentally against the Programme's commitments with the donor under the successive MOUs.

2.2. Methodologies used in the Evaluation

48. **The evaluation process** consists of inception phase, data collection and analysis phase and report drafting phase.
49. **In the inception phase**, two fact-finding country missions were initially conducted in Sri Lanka (07-18 December 2015) and Côte d'Ivoire (30 March to 06 April 2016) to better understand the conditions for impact. Sri Lanka was selected since it is the first country in which the Programme implemented the NTM survey,²⁰ and Côte d'Ivoire was the first country the Programme implemented the Trade Obstacles Alert Mechanism (TOAM). The selection of the first countries where different interventions were put in place allowed the evaluation to assess how the Programme has evolved and been adapted through time. The country missions collected early findings for the drafting of the inception country reports to identify key issues for in-depth analysis in the evaluation. The reports were shared with the Programme management for verification and feedback.
50. **In the data collection and analysis phase**, the evaluation matrix (see Annex 1) was developed after the missions. The matrix detailed the key questions to be answered against the evaluation criteria and the methods designed for data collection. The evaluation matrix was then shared with the Programme team for comments.
51. The data collection and analysis methods used are:
 - Interviews: during the two field missions and in Geneva, the evaluation conducted face-to-face and phone interview with 175 stakeholders in 68 institutions, in order to contextualize the need of different categories of stakeholders and their perspectives on the utility of programme products. Among the institutions interviewed were 27 public institutions, 22 TISIs, 14 enterprises, trading agents and private certification companies, 2 research institutes, a company that conducted the NTM survey and ITC.²¹ The ITC staff met included the NTM Programme managements, regional offices and technical sections relevant to NTM related issues. Interviews were semi-structured with predefined guidelines in a protocol for each category of stakeholders. The interview contents were captured in an analytical grid against each question in the evaluation matrix for the information to be compared, contrasted and triangulated. A list of people interviewed could be found in Annex 2.
 - Surveys: to collect comprehensive perspectives across different partner countries and projects, survey invitations were sent to the 574 policy makers, 203 TISI representatives and 185 academia and researchers who were listed as having been invited to participate in the stakeholders' workshops. 37 companies and consultants who were involved in the NTM survey process were also invited to participate in the evaluation survey.²² The surveys

equality (GE) "is to assess whether HR and GE are sufficiently embedded in the intervention, and the extent to which the intervention has contributed to enhance HR and GE".

²⁰ ITC implemented the NTM survey in Sri Lanka from February to August 2010, a stakeholders' workshop was carried out in November 2010 and the National Survey was published in December 2011.

²¹ The selection of the public institutions and TISIs to be interviewed was done under the following criteria: partnership with ITC at the time of the survey, institutions interviewed in the open-ended interviews as part of the survey, institutions present in the 'Draft list of the stakeholders that could be invited to the workshop', members of the National Committee for Trade Facilitation, institutions suggested by stakeholders during the evaluation mission, institutions directly involved on NTMs issues and direct beneficiaries of the Programme. The company and research institute that conducted the survey and one research institutes that facilitated the stakeholders' workshop were interviewed as ITC's partners at the time of the survey. Interviews with the enterprises were facilitated by the chambers of commerce, and the IEU did not select itself the companies to be interviewed.

²² The countries to which the surveys were sent were those had completed the NTM-Programme cycle (the final report had published), including Burkina Faso, Cambodia, Egypt, Guinea, Jamaica, Kazakhstan, Kenya, Madagascar, Malawi, Mauritius, Morocco, Peru, Rwanda, Senegal, State of Palestine, Tanzania, Trinidad & Tobago, Tunisia, Uruguay and Arab States (region).

were tailored made for the above-mentioned 4 types of stakeholders in their respective language in English, French, Spanish or Russian. The survey results were analysed by types of stakeholders and disaggregated by subgroups within each type. The detailed statistics and analyses are presented in Annex 4.

- Document review: in-depth desk review helped prepare the interviews and inform the evaluation team how the management of the Programme worked. The documents reviewed included the programme documents (programme plan, Logframe, theory of change, MOUs, donor reporting etc.), project documents (NTM survey reports, workshop agendas and materials, agreements with different partner institutions, documents of other follow up projects etc.) and corporate documents (ITC strategic plans, management protocols, corporate reporting portals, tender processes etc.). A list of documents consulted could be found in Annex 3.
- Thematic research: research for different topics related to NTM allow better understanding of the trend and development of the subject matter as well as better assessment of programme relevance and the nature of impact. The various topics include trade facilitation, quality issues, SME competitiveness, services trade etc. The research papers referred to are also presented in the list of documents mentioned above.

52. **In the report drafting phase**, the data collected and analysed through different channels were triangulated to present the findings of evaluation. The two country case studies conducted in the inception phase were taken into consideration again at this stage to examine the evolvement of the Programme. Lessons learned, conclusions and recommendations were then determined. The draft report will be circulated for stakeholders' review and afterwards revised incorporating stakeholders' comments. The final evaluation report will integrate and take into consideration all relevant comments.

2.3. Limits and constraints to the Evaluation

53. The NTM Programme evaluation's process was overall successful. Nonetheless, and as is often the case while conducting evaluations, the evaluation team had to face some challenges that are discussed below. It is worth noting that these challenges were manageable and did not affect the results of the evaluation.
54. As is always the case in such endeavours, a recurrent constraint lies with the availability of the key stakeholders who can often be busy and have multiple responsibilities, which may not allow them to participate when evaluation interviews are occurring and to provide required documentation in time. The evaluation team was able to conduct a satisfactory evaluation data collection process, although some interview scheduling and document gathering took more time than initially planned.
55. Obviously, the team could not visit all beneficiaries during the evaluation missions. The evaluation team visited two of the 41 countries involved in the Programme. That is why, in addition to remote interviews conducted with other stakeholders, a survey was launched to reach as many potential respondents as possible. Unfortunately, the response rate to the survey was relatively low, which hinders the evaluation team's ability to extensively use the survey data. More details on the survey process and response rates are presented in Annex 4. It is important to remind the reader that the evaluation team used the list of stakeholders invited to participate in the workshops to determine to whom the survey invitations would be sent; that the survey was translated into French, English, Spanish and Russian; that three reminders were also sent with extension to deadline for submitting the completed survey. This demonstrates the evaluation team's efforts to increase the overall response rate. It seems that the lists were not accurate in terms of actual participation. Indeed, they contained the names and contact information of the invitees to the events and not the actual participants. The possible explanation for the low response rate is that the individuals that received the invitation did not actually participate in the events and hence did not recall having been involved in the Programme. Yet the evaluation team clearly described the Programme in the invitation, with details of what comprised its different elements. Examples of relevant reports were also sent

to the potential respondents to refresh their memory. With the end result, the evaluation team had to take into consideration this fact when discussing findings related to the data.

56. A quick last note concerning component 4 of the Programme: as there was limited information on the component, the evaluation did not address it. It is to be mentioned that the component was not initially funded by the donor.

3. Evaluation Findings

3.1. Relevance

3.1.1. Alignment with ITC mandate and results framework

57. **Considering the importance of NTMs on trade development, and even more so for SMEs, in particular in developing countries, the broader strategic intent of the NTM Programme is fully aligned with ITC mandate.**²³
58. SMEs are found to be more negatively influenced by NTMs comparing to large companies as they are more likely to be affected by high costs to comply with regulations; their export value decrease more (by 3.2% and 2.6% respectively) comparing to those of the large firms (by 1.6%) facing 10% increase on NTM related obstacles.²⁴ Therefore, addressing the issue of contributing to an enhanced transparency at the country and global levels and to support stakeholders to mitigate the effects of NTM-related barriers is consistent with ITC mandate focused on enhancing SME competitiveness and inclusiveness.
59. Similarly, the evaluation has observed that during the period under evaluation, the NTM Programme has successfully evolved from an initially designed pilot research project into a full-fledged programme which objectives and design are plainly aligned with the ITC results framework. In other words, the Programme has successfully conceptualized its design, over time, around the output related value-added it delivers to its partners (policymakers, TISIs, SMEs, and external parties) along the Programme results chain.
60. ITC's perspective on NTMs is wider and more business-meaningful than the one followed by trade policy practitioners and other international agencies, which adds relevance to the NTM Programme within the context of ITC mandate. To illustrate this point, it is useful to analyse the multifaceted challenges faced by companies when a policy measure is implemented; a case story of a company is presented in the box below. This case story is composed of different testimonies provided by exporters and importers in the NTM surveys. To a certain extent, this short case story represents the basis on which the evaluation assesses the Programme's relevance:

Box 2: A case story of a lighting exporter

The US and EU markets require certifications from recognized laboratories (**regulation**). But I cannot obtain this certification in my country because there are no testing and certifying facilities (**procedural obstacle**). For my product to be tested, I have to send them to the countries nearby, and this will cost me 2,500 USD in transportation and another 60 USD per inspection of shipments. In addition, it often requires informal payments at multiple levels of interaction with port officials (**trade-related business environment**).

²³ In the Strategic Plan 2015-17, ITC "is the only multilateral agency fully dedicated to supporting the internationalisation of SMEs. Its joint mandate combines a focus on expanding trade opportunities with the aim of fostering sustainable development."

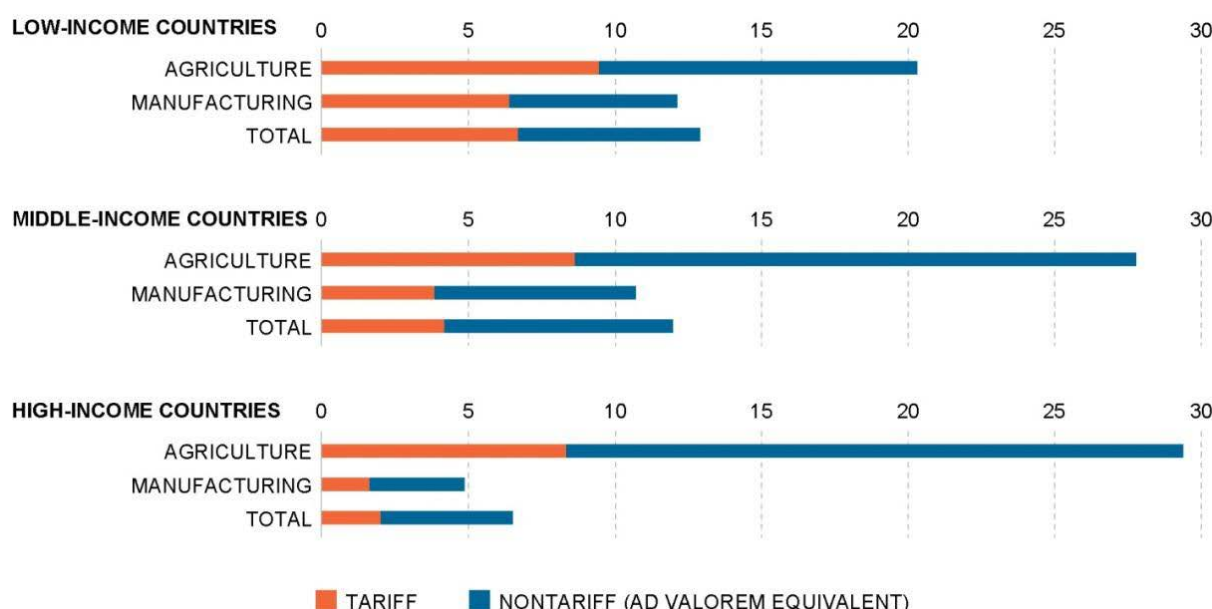
²⁴ ITC, SME Competitiveness Outlook 2016, <http://www.intracen.org/uploadedFiles/SMECO2016.pdf>, p.43-45 It is worth pointing out that these numbers were generated using NTM Survey data.

61. The NTM programme has created original and business-minded approach to classifying NTMs, which enables the ITC to identify, analyse, and in its later stage, address the above-mentioned NTM related regulation, procedural and infrastructural obstacles. As presented in the case story, the cost of NTMs to trade is not only the stringent regulation itself, but also the procedural and infrastructural challenges that can only be seen through the private sector's lens. The various aspects of NTM therefore present a wide spectrum for interventions for the programme and ITC, and for the scope of evaluation in assessing programme impact.

3.1.2. NTMs: the Most Significant Form of Trade Obstacle

62. The issue of NTM also stays relevant to the international trade environment. NTM has gained significant importance as trade barriers in the past decades, following the reduction of tariffs and the spread of global value chains. As the tariff rates reduced, NTMs became relatively common in national regulation to guard the product standards demanded by consumers, such as the use of Sanitary and Phytosanitary (SPS) as well as Technical Barriers to Trade (TBT) measures. The barriers have become an important concern to exporters and importers and the Programme's approach was to address the NTM-related issues.

Figure 2: Average level of restrictiveness imposed on imports



Source: *Inclusive Global Value Chains, OECD / World Bank Group, 2015, p. 74*

63. **Taking into account the importance of integrating into Global Value Chains (GVCs), NTMs are important to policy makers, TISIs and enterprises.**
64. Beyond the basic concerns about the obstacles to trade they generate, NTMs have acquired greater strategic significance with the increasing shift of global production towards Global Value Chains (GVCs). From a country development perspective, the integration in GVCs is considered by many analysts as precondition for Developing Countries to specialize production on existing high-growth, high-value markets; implying important spill over effects at the country level, in terms of foreign direct investment (FDI), technology and knowledge transfer and upgrading, from global firms to local producers, including SMEs providing specific inputs, and in the overall higher economic growth.²⁵

²⁵ ICTSD / World Economic Forum, 2016, Trade Governance Frameworks in a World of Global Value Chains, The E15 Initiative Policy Options Paper, http://www3.weforum.org/docs/E15/WEF_Global_Value_Chainreport_2015_1401.pdf

65. In the overall, NTMs gain importance in the functioning of GVCs as they affect imports and exports, which could happen multiple times in the production process. Since GVCs involve a complex web of coordinated suppliers, vendors, and service providers of all kinds and in multiple locations, on a real-time basis, the links established between enterprises in a GVC rely on upstream (Developing Country) producers delivering their outputs on time and meeting the quality and safety standards required within the GVC. As a result, considering that NTMs is crucial factor in terms of enhancing time and quality delivery performance of upstream producers, mitigating the effects of NTM-related barriers at the domestic level should be a priority for any Developing Country to ensure its participation in GVCs.
66. During the evaluation process, the link between country participation in GVCs and NTM mitigation was unambiguously conveyed by policy makers in the context of the increasing importance of regionally oriented production networks, specifically concerning the crucial need to participate in the emerging hub of China-centred GVCs in South and South-east Asia.
67. Concerning company participation in GVCs, since “GVCs frequently requires often quick and inexpensive movement of goods over borders, and delays in those movements can be deadly to the aspirations for upgrading and strengthening GVC participation”, procedural, and business environment, NTM-related costs in terms of logistics and inefficient border operations are also becoming increasingly crucial. These include “all aspects of clearance procedures, port operations, cargo handlers, storage facilities as well as transport and trade-related infrastructure.”²⁶
68. In addition, complying with regulations required in destination markets implies higher costs and more procedures for the companies and reduces their willingness to export. However, compliance also associates with better prices if companies are able to comply.²⁷ Therefore, compliance-related NTMs are two-edged swords for enterprises: for those who can comply, they will become more productive and gain better market position; for those whom cannot, they exit from the market.
69. Beyond the issue of NTMs for goods, the growing importance of GVCs is intricately connected to FDI and trade in services. The importance of services lies in the close link with goods trade and the large weight in world economy, which account for 70% of world GDP. The WTO World Trade Report in 2012 stated that “export competitiveness in manufacturing sectors... is positively associated with inward foreign direct investment and imports of business services and negatively affected by regulations that hinder such trade”. As explained above, FDI is often a necessary condition for the participation of companies in GVCs and is determined by the role that producers in different countries are assigned to play in the GVC. Similarly, NTMs on services are crucial since “trade in services is essential for the efficient functioning of GVCs, not only because services link activities across countries but also because they help companies to increase the value of their products.”²⁸ Given the importance of services in the GVCs, the expansion of programme focus from NTMs for goods to services is also vital and strategic.

3.1.3. The NTM Issue and Stakeholders’ Preoccupations

70. **The Programme’s objectives of working towards tackling the negative effects of NTMs is aligned with the major preoccupations the beneficiaries from the private sector express, particularly SMEs. As for the public sector beneficiaries, the fact that the Programme is demand based—i.e. the countries need to formulate an official demand to take part in the Programme—demonstrate that it is aligned with their needs. The business lens approach applied to ITC’s analyses on NTM is unanimously valued.**

²⁶ Ibid

²⁷ ITC’s SME Competitiveness Outlook found that regulations are positively associated with higher prices; the more regulations are perceived as burdensome, the higher the export prices. See SME Competitiveness Outlook 2016, <http://www.intracen.org/uploadedFiles/SMECO2016.pdf>, p.45

²⁸ OECD: <https://www.oecd.org/sti/ind/global-value-chains.htm>

71. Stakeholders' need in terms of improving their knowledge on NTMs is significantly high, concerning all categories of stakeholders (decision makers, TISIs and enterprises), while each of these categories has specific needs and expectations. Moreover, the evaluation detected that their expectations remain high, since the vast majority of respondent stakeholders expressed interest in working again with ITC on NTMs related future initiatives.
72. Decision makers and TISIs are almost unanimous in considering that NTM information is "extremely important" or "very important". Within decision makers, the Ministry in charge of trade issues is the most interested in, and aware of, the importance of NTMs; while within TISIs, most interested clients are those specialized in trade information/ intelligence. Policy makers and TISIs also share the same view that building a more informed knowledge basis on NTMs, in particular procedural obstacles, represents an advantage to pave the way for a constructive public-private dialogue and for trade negotiations and enhancing better participation in GVCs.
73. Enterprises listed access to NTM related information as the third most important bottleneck to trade in a recent survey conducted by OECD, WTO and ITC²⁹. SMEs are particularly limited in their capacity to expand to new markets because of a lack of access to the information on the NTM-related requirements on these markets and since they are likely to be more affected by high fixed costs to comply with regulations. As a result, SMEs are found to be more negatively influenced by NTMs comparing to large companies as their export value decreases more (by 3.2% and 2.6% respectively) comparing to those of the large firms (by 1.6%) facing 10% increase on NTM related obstacles.³⁰ The evaluation findings in Sri Lanka also show a consensus among all stakeholders indicating that exporters are still limited in their capacity to expand to new markets because of a lack of access to the information on the NTM-related requirements on these markets.
74. Two types of user emerge as being particularly vulnerable to NTM related obstacles. SMEs are confronted by relatively higher costs for obtaining information and complying with regulations. In addition, least developed countries' (LDCs) economies are built on the basis of SMEs with less big enterprises than other economies.³¹ Data collected during the evaluation point to the fact that LDC representatives were more present and active in the stakeholder workshop held by the programme and seeing the NTM survey reports.

3.1.4. The NTM Database

75. **With different types of beneficiaries come different types of needs. The Programme's NTM database was designed to be SME user-friendly. Unfortunately, the evaluation team could not assess if the SMEs consider the database useful for their needs, as it is not possible to actually obtain the contact information of the database's beneficiaries.**
76. The design and approach of component 1 specifically focuses on enterprises being more knowledgeable about NTMs to access specific markets. The evaluation observed that this clearly corresponds to the need expressed by the companies. The Programme has developed an enterprise-friendly design of its on-line NTM database. Contrary to similar databases³² that require more knowledge on NTM and are more adapted to researchers, the evaluation team considers that the ITC portal enables enterprises to easily identify the prevailing NTMs for a given product between two countries. However, due to total lack of traceability concerning the identity and the type of users accessing the NTM database, the evaluation has not been in a position to assess neither the quantitative level of SMEs' use of the NTM database, nor SMEs'

²⁹ ITC, SME Competitiveness Outlook 2016, <http://www.intracen.org/uploadedFiles/SMECO2016.pdf>, P.40

³⁰ Ibid, p.43-45. This research used the NTM survey data to produce these numbers.

³¹ Ibid, P.43

³² The World Integrated Trade Solution (WITS) of the World Bank and Trade Analysis Information System (TRAINS) of UNCTAD. It is important to note that the data collection effort is shared among various institutions and that the data that shown is the same, but in a different way for different audiences.

qualitative assessment of it. Nevertheless, anecdotal evidence gathered by the evaluation indicated that policy makers and academia demonstrated appreciation for this tool.

77. The database gathers NTM regulations applied by countries (hereunder also called NTM data), and disseminates through a module embedded in the Market Access Map. The database allows enterprises to search and gain knowledge on the restrictions that countries applied for exporting or importing specific products. These regulations can be searched by country and by product, which does not require exporters and importers to equip with prior knowledge on the NTM nomenclature.³³
78. Once collected, the data are then disseminated through three portals respectively owned by the three organizations: the Trade Analysis Information System (TRAINS) established by UNCTAD, the World Integrated Trade Solution (WITS) owned by the World Bank and the ITC Market Access Map, through a module developed in programme phase 1 and launched in 2012. The UNCTAD TRAINS database is physically located at the World Bank server where the WITS application is running, but is directly maintained by UNCTAD.
79. The table below presents the similarities and differences between the databases' portal. This table demonstrates that the ITC portal has a relatively good comparative advantage over the others. It is also to be noted that the three portals are designed for different users and purposes. The ITC portal targeted exporters and importers from the private sector. It was designed with the needs of the traders in mind, such as the "search by product" approach and presentation of data with context and explanation to technical terms. On the other hand, portals of UNCTAD and the World Bank are more designed for trade policy practitioners or researchers, who are more familiar with the NTM nomenclature and in need of data for aggregation or statistical analysis.

Table 1: Comparison of Functionalities for ITC, UNCTAD and World Bank NTM Data Dissemination Portals

Portal	Feature and functionality	Search regulations by country and by product	Data presented by (how is data organized)	NTM technical terms explanations	Summary of the regulations	Contexts of the regulation*
ITC Market Access Map NTM database		Yes	Title of regulations	Yes	Partly yes (not for all countries)	Partly yes (not for all countries)
UNCTAD TRAINS		Yes	NTM requirements	No (only provide link to the MAST classification)	Yes	Partly yes (no national institution in charge)
World Bank WITS		No (must select NTM type for search)	Codes (NTM code, product code, country code etc.)	No (only provide link to the MAST classification)	No	No

* Note: national institution in charge, original legal documents, start date of the regulation etc.

³³ The only technical information required is the product code. The products are classified by the Harmonized System (HS) 6-digit code, or by the national tariff line of a specific country, which is longer than the 6-digit HS code. In searching for the product, the users can enter these codes; the database also allows searching by product name, but users have to then choose the exact product from a list of HS classified products.

3.1.5. Stakeholder's Appreciation of NTM Surveys and Related Analyses

80. **All categories of stakeholders noted the value of the NTM survey approach. The value of the survey is mainly seen in providing information for stakeholders to learn about NTM.**
81. The evaluation observed that this particularly vital at the outset of the programme, as these topics were new and policy makers needed to better understand the concept of NTMs and the NTM classification; policy makers and TISIs also share the same view that building a more informed knowledge basis on NTMs and related procedural obstacles is an advantage to pave the way for a constructive public-private dialogue and for bilateral and regional trade negotiations.
82. ITC's approach is comprehensive in addressing all NTMs and related procedural obstacles encountered by exporters and importers in a country, while other private sector surveys³⁴ and related studies have either a broader focus, examining general business environment, or a narrower focus, looking at a specific product or market. ITC is the sole provider of comprehensive NTM information. In addition, the location in Geneva is another advantage of ITC. The survey results have been provided to multiple WTO committees and meetings, forming a special advantage for ITC to bring business voices to the multilateral process.
83. **The data and related analysis generated through the Programme is considered somewhat too strategic and detailed for the needs of the SMEs. The SMEs would have needed more basic and straightforward information on NTMs. The NTM Programme's reports are considered useful by the public sector and TISIs' representatives, although often lacking an analysis of the causes and context of the obstacles and conclusions and recommendations were considered as too vague and too general.**
84. Some limitations of the NTM survey approach and the information on regulations as disseminated in Market Access Map were also expressed. Although the survey, the data it generated and its analysis were not planned to be specifically packaged for SMEs, to ensure the private sector representatives were made aware of the aggregated NTMs issues they face, informing them on the survey results through a simplified and user-friendly approach would have been desirable. After all, the ultimate objective of the NTM Programme is to improve the SMEs' competitiveness. For policy makers who have the authority to address the issues, the survey did not provide an analysis of the context and the reasons sustaining the obstacles identified; the conclusions and recommendations, suggested by policy makers themselves and other stakeholders, were too vague and not sufficiently instrumental to identify the changes and the steps necessary to fix the problems. For trade negotiators in particular, the information on NTMs applied in foreign markets is not sufficient to build the legal cases needed to justify their arguments. The programme was aware of this and the data was provided to inform these stakeholders and not support the building of legal cases. It was intended to be a starting point of the process of improving the trade contexts affected by NTMs. Nevertheless, these impressions on the usefulness of the data were shared with the evaluation team.
85. In the context of current bilateral and regional trade negotiations, policy makers in Sri Lanka pointed out that they today need a better understanding of the NTM-related trade barriers faced by Sri Lankan exporters in foreign markets. Retrospectively, they consider that the NTM Programme's data, collected through the survey with the private sector, focused too much on internal issues.
86. With the notable exception of the EU, most NTM surveys have been conducted in relatively small developing country economies. NTMs applied by major trade powers and in particular in emerging markets, such as China, Brazil and India, would support the work of policy makers. The need for NTM information on foreign markets is also stressed by TISIs and other

³⁴ For example the World bank Enterprise Survey and Doing Business.

stakeholders such as academia and researchers. It is to be noted however that the Market Access Map contains the NTMs applied by India.

87. Across all categories of stakeholders, stakeholders consistently highlighted the importance of similar survey exercises to be undertaken over time, for a comparison of the results and follow up actions to address the obstacles.

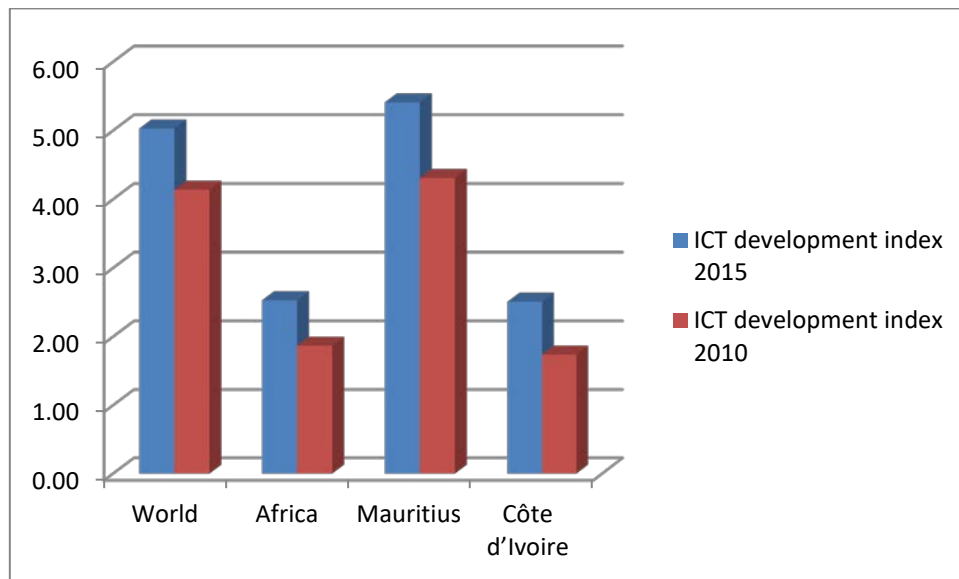
3.1.6. The Trade Obstacles Alert Mechanism (TOAM)

88. **ITC's Trade Obstacles Alert Mechanism (TOAM) corresponds to the need of countries to develop online platforms enabling public / private sectors interaction to identify NTM-related obstacles and monitor their resolution. However, its usability is fundamentally linked to users' access to internet.**
89. **The approach at the core of TOAM to associate a network of institutions, accountable for resolving the obstacles, is a competitive advantage, while other similar platforms have no such mechanism or only possess a focal point in each country.**
90. The TOAM is selected as a particular focus among all the initiatives to mitigate NTM related obstacles, as it was directly implemented and designed by the programme. During the period under evaluation, TOAM has been implemented in two countries: Côte d'Ivoire and Mauritius. TOAM is an online platform implemented at the national level, for enterprises to report trade obstacles anonymously. It is not only a technical communication platform but rather a network of private and public institutions accountable for validating and resolving the obstacles reported through TOAM by enterprises. Its uniqueness is that no other somehow-similar platform³⁵ is coupled with a transparent trade obstacle resolution governance system at the national level.
91. The evaluation observed that stakeholders value TOAM as a tool to promoting transparency, dialogue and accountability. They also appreciate the platform allowing information to be exchanged quickly and obstacles to be reported anonymously. The design is considered as adequate to encourage public agencies to be more accountable and efficient.
92. The Mauritius policy maker sees the value of TOAM in allowing interaction with private sector, which fulfilled the need of Mauritius at the time for an online platform for dialogue, and in monitoring the resolution of the obstacles. Stakeholders in Côte d'Ivoire viewed the TOAM as one of the solutions to mitigate the NTM related obstacles.
93. Stakeholders in Côte d'Ivoire were also unanimous in highlighting TOAM potential value for addressing NTMs encountered by domestic enterprises in neighbouring countries. Since enterprises are using TOAM to report on NTM-related barriers, which are often generated in foreign markets – for which TOAM partners cannot provide a solution – TOAM, would achieve higher relevance if TOAM systems implemented at national level were bundled into regional networks.³⁶ The usability of TOAM is fundamentally linked to users' access to internet. The internet connectivity is a precondition rather than guarantee of usage and has to be considered from the beginning of deployment. This is clear represented comparing the cases of Côte d'Ivoire and Mauritius, where the internet connectivity levels are very different. The ICT development index composed by ITU shows that in 2015, Mauritius has the highest ICT development level in Africa with 41% internet users and 48% households with access to Internet, while Côte d'Ivoire falls well behind with 15% internet users and 12% households with Internet access.

³⁵ For example the COMESA-SADC- EAC Tripartite FTA platform (<http://tradebarriers.org/>), the Trade Barrier Reporter of UNCTAD (<http://ntb.unctad.org/>) and the Global Trade Alert platform (<http://www.globaltradealert.org/>).

³⁶ A regional TOAM is being developed in UEMOA in 2017, it is nonetheless after evaluation period

Graph 2: ICT Development level in TOAM countries



Source: ITU, ICT development index, <http://www.itu.int/net4/ITU-D/idi/2016/index.html>

94. This situation affects the opinions on the usefulness of the tool in the two countries, both from the administration and companies' side. In Mauritius, the agencies have no technical issues receiving details on noticed obstacles and dealing with them through IT tools. On the contrary, in Côte d'Ivoire, some ministries involved in TOAM have no access to internet and suggested that a SMS system could allow for a wider use of the tool. The companies are also not used to going on an online platform and instead rely more on personal and face-to-face contacts to resolve the obstacles they face.
95. The NTM programme team has also noticed the issue of infrastructure capacity but has not inserted it in its overall strategy. In Côte d'Ivoire, the team documented the lack of internet connectivity before implementation, and did consider the possibility to use paper work and SMS to complement the insufficiency, but these measures were not in place. Still, paper versions of the survey, to capture the obstacles to trade, were made available. The team also considered that accessing through smartphone was feasible. Nevertheless, the above figure on the limited internet users in Côte d'Ivoire does not support this view.³⁷ It would require a tailored platform or communication strategy adapting to the need and capacity of the country.
96. It is worth to note that the evaluation observed that TOAM's limits in implementation have been directly associated with the non-respect of its nascent model.³⁸ In fact, the model was to a certain extent being developed as TOAM was being deployed. Therefore, the NTM programme figured out what were the limitations of TOAM with retrospect and adapted the model in consequence. Concerning in particular the specific case of Côte d'Ivoire, it is important to highlight that TOAM was introduced to Côte d'Ivoire one day after the survey results were presented to stakeholders, and some institutions were surprised to see this mechanism. Whether it is the solution expressed most needed by stakeholders is therefore questionable. However, the TOAM deployment needs to be replaced in its overall context. It is important to recognize the overall complexity of the CIV case given the interplay between various projects and related objectives, timelines and donor expectations. As such, the Programme had already been working on the survey as PACIR was being implemented. PACIR was not in a position to wait for the survey results to design specific activities. In an ideal world, both would have

³⁷ According to ITU, the indicator on individuals using the Internet "refers to people who used the Internet... irrespective of the device and network used in the last three months. ...Access can be via a fixed or mobile network." It means that even taking into account users accessing internet through smartphone, the population with access to internet (15%) is still low.

³⁸ Such as not associating the relevant network of institutions and not sufficiently engaging with participating agencies. Please see below chapter 3.2 Effectiveness for further analysis.

been designed together and in synergy from the start. It is also important to note that the TOAM was not an idea driven by ITC but developed in response to the demand expressed by CIV.

3.1.7. Trade Facilitation Agreement (TFA) and NTM Programme

97. **The 2013 World Trade Organization (WTO) Trade Facilitation Agreement (TFA) sets an international context in which ITC's NTM Programme finds an important reinforcing role towards facilitating the TFA's implementation.**
98. The 2013 WTO Trade Facilitation Agreement (TFA) aims at expediting the movement, release and clearance of goods.³⁹ The TFA principally corresponds to the procedural obstacles. One main area of its implementation is to minimize administrative procedures delays.⁴⁰ Other TFA requirements largely address procedural obstacles related to lack of information, administrative burden, inconsistent behaviour of officials, delays, informal and unusual payment requirements, and legal constraints due to lack of appeal and dispute settlement procedures. The TFA also aims to reduce the effects of NTMs in three specific cases.⁴¹
99. The TFA introduces requirements in terms of dialogue and transparency: Members have agreed to establish a National Committee on Trade Facilitation to coordinate and monitor different government agencies (and possibly the private sector) actions to implement the TFA. This forum can lead to solutions to NTM and procedural related obstacles. Any change in regulations, should allow a consultation period for traders and other stakeholders to comment before entering into force to enable government to consider the potential costs for enterprises and reduce the chance for introducing burdensome measures. Then, all trade related requirements and procedures should be published and made available through internet. Members are committed to set up enquiry points to answer questions related to the information published.
100. Although the TFA presents a major opportunity and potential to address many NTM and procedural obstacles, some challenges, which are potentially included in the NTM Programme ToC, are not in the scope, or not explicitly included, in the range of TFA.⁴² Nevertheless, since the TFA adds on legal obligations for WTO members to address trade obstacles to meet the agreed country schedules and commitments, it further strengthens the relevance of ITC approach in trying to mitigate the effects of procedural obstacles as an integral part of addressing NTMs. TFA requirements also largely echo the emphasis of the NTM Programme on the need for dialogue and transparency to identify and address NTM-related barriers. The NTM programme's survey also helps monitor whether agreements such as the TFA, even if implemented "on paper", actually work on the ground. Most principles that WTO members sign off upon in the TFA were already enshrined in earlier agreements and commitments, e.g. the Kyoto Protocol and other WTO agreements such as on SPS and TBT.

³⁹ WTO, Agreement on Trade Facilitation, preamble

⁴⁰ Under the requirements of articles 7, 8, 10 and 11, trade facilitative measures are aimed to expedite administrative process delays in terms of: allowing submission of documentations prior to the arrival of goods, coordinating among border agencies in its operating time and procedures, simplifying documentation requirements and minimizing transit procedures.

⁴¹ Article 10 explicitly asks member countries not to use pre-shipment inspections for classifications and customs valuation purposes, and to avoid introducing new requirements in relation to pre-shipment inspection, unless for sanitary and phytosanitary purposes. Article 6 requested that customs fees and charges to be limited to the costs of services rendered, which can help reduce one of the additional charges and taxes imposed on the traders. For goods in transit, article 11 regulates members not to apply technical barriers to trade related regulations and conformity assessment requirements.

⁴² This is mainly the case for infrastructures and business environment challenges, such as lack of testing and storage facilities, poor roads and transportation systems, and low level of security. Moreover, TFA effects on regulations is somehow limited, as trade facilitative measures mainly address efficiency in crossing the border; and do not in themselves prevent the use of restrictive regulations. Similarly, many of the NTMs that are applied behind the border, such as quantity and price control measures, restriction to distribution and post-sales services, subsidies and government procurement requirements, are not within the scope of the TFA. Finally, not all TFA requirements are mandatory, as members are only encouraged to adopt international standards in the use of export and import formalities; the same applies to the measurement and publication of average release time of goods, and some other measures.

3.1.8. Country Portfolio

101. **Considering the donors' and ITC's priority portfolios, the sample of countries involved in the Programme is well balanced.**
102. When examining whether the NTM Programme has developed a needs-aware country selection strategy, it is necessary to assess different types of needs that are at play.
103. On the one hand, country priorities have been defined at the ITC level: In ITC's Strategic Plan 2010-2013, it is specified that ITC focuses on responding the needs of least developed countries (LDCs), landlocked developing countries (LLDCs), small island developing states and Sub-Saharan African countries.⁴³ From 2015, ITC further broadened the scope of priority countries to include small vulnerable economies and post-conflict countries.⁴⁴ The evaluation has verified that these types of countries are indeed specifically in need of support to tackle NTM obstacles, which particularly affect them and their economies.⁴⁵
104. On the other hand, besides serving in priority those countries which are the most in need, the value of the NTM Programme services also relies on their scope, and more specifically on addressing NTMs required in countries with large international trade market share, because they play a significant role in GVC, either at the global level, or at the regional level. For example for Sri Lanka, the evaluation observed that NTMs implemented by India and China were clearly of main—still unmet—interest.
105. From a strategic perspective, selecting the countries for NTM Programme services is therefore a matter of balancing the countries that are most in need, with those which importing market size can generate value from the market access perspective.
106. Considering the NTM survey issue, 41 countries did benefit of an NTM Survey within the period under evaluation, as shown in Annex 5. The 41 countries are spread across 5 regions where ITC operates in, and cover different income levels and sizes of economy. In analysing the portfolio, the total share of ITC priority countries is about 76% of the total of surveyed countries. The remaining 24% were either selected according to a specific interest of the donor,⁴⁶ or with large international trade market share, in absolute term or in regional term.⁴⁷
107. Considering data coverage within the NTM database (component 1), at the end of NTM Programme phase 2, the NTM database presents NTM regulations implemented by 90 countries. These 90 countries cover 29 developed countries, 51 developing countries, 10 LDCs, together accounted for 66.6% of goods imports in the world.⁴⁸ It constitutes a good base for exporters to access to the import requirements applied by 2/3 of the markets in the world.
108. The coverage of the country portfolio in terms of information generated by the Programme is balanced and strategic. However, as demonstrated with the case of Sri Lanka and the country's

⁴³ In the MOU with DFID for phase 2, it was also mentioned that priorities would be given to selecting LDCs.

⁴⁴ ITC Strategic Plan 2015-2017,

http://www.intracen.org/uploadedFiles/intracenorg/Content/About_ITC/Corporate_Documents/Strategic_Plan/Strategic%20plan_FINAL-web.pdf

⁴⁵ The evaluation has observed a higher demand of the LDC stakeholders, demonstrated in their high recall rate for the NTM programme products, including the stakeholder workshops and survey reports. A similar trend can also be observed in the substantially wider request for technical assistance for LDCs and LLDCs to implement the Trade Facilitation Agreement. Moreover, as highlighted through ITC research, enterprises in LDCs are smaller in scale and thus find it more challenging to comply with NTMs. See ITC, SME Competitiveness Outlook 2016, P.43

⁴⁶ These countries include:

- Morocco and Tunisia (through the Canada funded Enhancing Arab capacity for trade, EnACT project);
- Palestine (through the Canada funded State of Palestine- Strengthening Capacities in Trade Promotion for Export Development project);

⁴⁷ These countries include Indonesia, Philippines, Thailand, Colombia and Peru, together counting for about 3% of world trade volume. In the same vein, it is worth to mention that the NTM survey of the EU, which represents about 15% of the world's imports in 2016, has added significant value to the overall portfolio. See below further analysis in Chapter 3.2 Effectiveness.

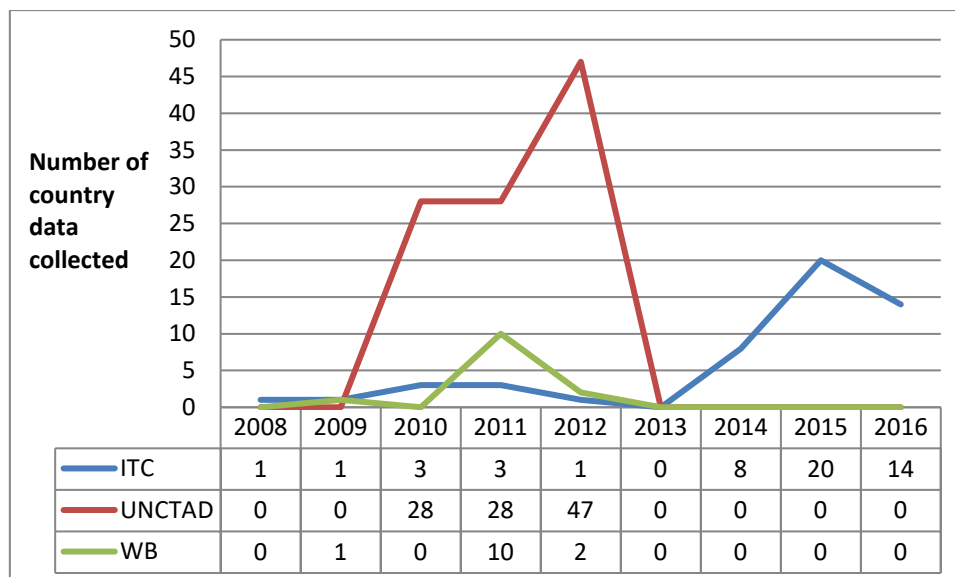
⁴⁸ Calculated with 2015 World Bank trade data, <http://data.worldbank.org/topic/trade>

interest in working with India and China on the NTM these countries impose, the obstacles to trade are present *between* countries. Hence, while making information available on NTMs from other countries is interesting, fostering dialogue between the Programme-involved countries would also have been desirable. The programme has worked towards this direction by developing the regional initiatives for Arab States, ECOWAS and EU, while China and India remain out of the picture⁴⁹.

3.1.9. Partnerships Development

- 109. **The Programme’s management team was able to initially develop good partnerships with external organizations to leverage results. However, these external partnerships are not being sufficiently maintained presently. In addition, the ITC internal coordination between sections and offices has not fully met expectations.**
- 110. Some partnerships existed from the original design, in particular the collaboration on NTM data collection with UNCTAD and the World Bank and the joint work with WTO and World Bank in developing the services trade taxonomy. These partnerships have clearly provided value to the ITC and were seminal in supporting the transition from a pilot research project to a full-fledged initiative to identify and address NTM-related barriers at the country level.
- 111. Launched in 2008, the purpose of the partnership between ITC, UNCTAD and World Bank was to create joint forces in collecting NTM data to reach a worldwide coverage. In examining the data collected by each agency, it can be confirmed that the partnership has enabled the NTM Programme to achieve wider country coverage, especially during phase 1. During that phase, the overwhelming majority of country data was collected by UNCTAD and the World Bank and integrated within the NTM Database. ITC developed the data capturing templates and guidelines that all organizations use.

Table 2: Source of NTM data displayed in Market Access Map



Source: Market Access Map, <http://www.macmap.org/SupportMaterials/DataAvailabilityMfn.aspx>

- 112. Each year during the partners’ meetings, the three organizations have been coordinating the portfolio of countries to cover. It was not possible to identify a formal agreement on principles

⁴⁹ The NTM programme provided information on issues faced with India by companies across the world and specifically East Africa to the SITA project in the early stages of the SITA design. SITA does work on the integration between selected East African countries and India. This is a good example of how the division of work and mandates between the NTM programme and other technical assistance in ITC can work.

used neither for the division of labour between the three agencies, nor any regular plan for updating country data. In practice, the selection of countries seems having depended on case-by-case interest and soft commitments of each of the organizations and the bottom-line is that the three partners relied on data sharing among each other to obtain information on countries of interest. Initially, priority has been given to increase the number of countries for the collection rather than ensure regular updates and from the very start, the idea was that the data was to be shared.

113. The operational model of the partnership not only influenced the country coverage and update frequency of the data, but also the type of data collected. The data collected by ITC and World Bank included both import and export measures, meanwhile data collected by UNCTAD mostly only contained import measures. Moreover, since 2012, the World Bank has not been active in data collection. Currently, World Bank participation pertains to hosting the server for UNCTAD database. The level of cooperation between ITC and UNCTAD, although still in place, seems to have been diminishing. It is observed that while UNCTAD continues to collect and disseminate NTM data through the TRAINS portal, the data collected by UNCTAD after 2012 is not displayed on ITC's portal, and vice versa. It seems that this situation is due to technical problems which have presently being resolved which will allow ITC to start again uploading UNCTAD's data.
114. Other partnerships grew organically: For co-implementation, cost sharing or consultation purposes, the NTM Programme successfully developed partnerships with a variety of international or regional organizations. For example, this has been the case of UNECE in Kazakhstan, of AfDB in ECOWAS region and of CAF in Colombia and Ecuador. These partnerships were mostly derived from a larger programme or through the network of ITC Regional Offices.
115. Within the ITC, partnerships between the NTM Programme, Regional Offices and Technical Sections evolved over the years from cooperation on a case by case basis (phase 1) to more systematic collaborative approach in phase 2. In alignment with the 2016 Rules of engagement for ONE ITC,⁵⁰ Regional offices have a particular role in providing country and regional intelligence, which is indispensable for identifying relevant stakeholders, ensuring local ownership and following up on achievements. Particularly in phase 2, the NTM programme actively reached out to the various ITC sections including through financing the participations of country officers and technical staff in stakeholder events and setting aside funds to facilitate the definition of follow-up technical assistance. In practice, while some Country Officers were more proactive in supporting the quality of survey process and in using the NTM survey to contribute to the design of follow up projects, others have been rather reactive. In terms of Technical Officers, they have the task of developing effective trade related technical approaches and solutions. Some technical teams successfully contributed to NTM programme activities, either in providing inputs for NTM survey recommendations, participating in stakeholder workshops or in follow up initiatives, such as the team of Export Quality Management (EQM).⁵¹ Other technical sections rarely used the evidence created by the programme despite the fact that the operating fields were closely related to NTMs, this was the case for the Trade Facilitation and Policy for Business (TFPB) section.

3.1.10. Innovative Approach to NTMs and TOAM in the National Context

116. The programme's business perspective approach to NTMs is considered original and innovative. As analysed above, NTMs are derived from a trade policy concept and usually examined by related organizations from a legal perspective.⁵² The business survey approach sees NTMs from a holistic point of view, and presents the challenges faced by companies within a wider picture, together with procedural and infrastructural obstacles. This approach is

⁵⁰ Rules of engagement for ONE ITC, 2016, ITC internal document

⁵¹ The EQM team was under the Enterprise Competitiveness (EC) section in ITC. Since the organizational restructuring in 2016, it was integrated into the Trade Facilitation and Policy for Business (TFPB) section.

⁵² For example, WTO, UNCTAD and World Bank's NTM related activities mainly focus on collecting and analyzing official NTM regulations.

also innovative in the domain of trade in services, while existing efforts also concentrate in analysing regulations,⁵³ but not the obstacles experienced by enterprises.

117. The TOAM is also innovative in the national context of Côte d'Ivoire and Mauritius. Although there was a notification platform to alert NTM-related obstacles in the COMESA-SADC-EAC Tripartite Free Trade Area,⁵⁴ similar mechanism for the private sector to report trade obstacles confronted did not exist on the national level. Moreover, as mentioned above, the network of institutions to resolve trade obstacles is a unique design of TOAM that was not seen in other similar platforms, which at most possess a focal point in each participating country.

3.1.11. Implicit Contribution to Human Rights and Gender Equality

118. The NTM Programme's design in itself did not include a human rights or gender specific agenda. However, the Programme shares the same MOUs with DFID as the Women and Trade Programme. By request of the Women and Trade Programme, the NTM surveys included a question on the company ownership, management and employment by gender in the phone screen stage. The gender-related data collected provides important insights to reveal possible gender-specific NTM-related obstacles, which is valuable to raise awareness of gender bias in the trade domain that is often considered as "gender neutral". The use of these data in analysis will be analysed below in chapter 3.2 Effectiveness.

3.2. Effectiveness

3.2.1. Effective Management of Service Providers

119. **The Programme has been extremely effective in developing and deploying a robust method to identify and analyse NTMs from the business sector perspective. The European Commission has adopted the method for the identification of NTMs in the EU market. At the country level, the Programme has contributed to the enhancement of national surveying companies' capacity in conducting broad, in-depth survey processes linked to NTM and related topics. Private sector service providers' capacity has also been enhanced in terms of data analysis. Hence, the quality of the data generated is considered high.**
120. The Programme has been collecting NTM data through two main tracks: the database and the NTM surveys. Concerning national surveys, they have been conducted according to an operational framework, which is aligned to the ToC, demonstrating integrity and constant improvement throughout the period under evaluation. The operational model is described above in section 1. To summarise: National surveys have been initiated upon receiving the requests by the beneficiary government. A national surveying company or institution is then selected and trained on the survey methodology and classification. This company/ institution conducts data collection through telephone and face-to-face interviews with exporting and importing companies. ITC verifies the data quality throughout the data collection process and proceeds with preliminary data analysis. The analysis is done principally by a local consultant or by ITC when no suitable candidate was identified. Open-ended interviews take place with key stakeholders to gather further contextual information. A draft report is prepared and preliminary findings are presented to local stakeholders in a workshop. A final survey report is published on the basis on the local stakeholders' comments and recommendations gathered during the workshop.

⁵³ These are for instance the World Bank's Services Trade Restrictions Database (STRD) and OECD's Services Trade Restrictions Index (STRI), which collect services trade regulations and measure their restrictiveness. In addition, WTO's I-TIP Services database collects members' services trade commitment, and categorizes them since July 2016 according to the new taxonomy developed jointly by WTO and the World Bank.

⁵⁴ The COMESA-SADC- EAC Tripartite FTA platform: <http://tradebarriers.org/>

121. The selection of the national surveying company or institution has been taken place through a transparent and well-documented tender process.⁵⁵ The selection criteria have focused on the technical capacity to conduct the survey. Throughout the period under evaluation, the NTM Programme has expanded and improved selection criteria on a learning-by-doing mode, using lessons learned from preliminary experiences and issues faced by surveying companies.
122. In terms of the role assigned to the surveying companies and consultants, the NTM programme has proved reactive and pragmatic. It has continuously monitored performance and has adapted the duties assigned each type of actor to the contextual complexity and to the competencies available to implement each step in the survey process.
123. The survey companies were involved in data collection, and some (25% of the companies responded to the evaluation survey) produced the final survey report. In the majority of cases, this task was either assigned to individual consultants or undertaken directly by the ITC.
124. The evaluation has gathered elements suggesting that the NTM Programme has been able to increase the performance of surveying companies by developing dedicated training, which has improved overtime. In 2014, it further improved training by launching an e-learning training to support surveying companies. According to programme management's observation, the online training has improved surveying company trainees' technical knowledge, in particular concerning assigning data gathered through face-to-face interviews against the NTM classification. It has allowed the NTM Programme to concentrate on conducting face-to-face training through training on mock interviews and to conduct a much effective selection of candidates suited to conduct the survey. From data collected during the evaluation, company representatives and consultants appreciated the NTM Programme because of the quality of the trainings.

3.2.2. Performance in Survey Data Treatment and Analysis

125. Evidence gathered by the evaluation indicates high performance in the treatment and analysis of data. The NTM survey can be considered as the backbone of the Programme, since the survey, methodology and data analysis have been entirely conceptualized and developed by the Programme. The Programme aimed at reaching a representative sample of companies, allowing for the extrapolation of the survey results at the country level. To achieve this level of representativeness, the Programme applied a two-steps sampling methodology which is described in Annex 8. The Programme manager also conducted data quality control, including through supervising pilot interviews, frequent checks of data throughout the survey process as well as randomly calling back companies to check whether the data sent by companies was accurate.

⁵⁵ An exception is in the State of Palestine, where the Palestine Trade Centre (PalTrade) requested and implemented the survey as part of a wider technical assistance project managed by ITC (DCP) and UNDP.

Box 3: Sampling methodology of NTM survey in Sri Lanka

An in-depth verification exercise was done for Sri Lanka—using the related publication—the first country that applied the randomised sampling technique and was found to be satisfactory:

- Concerning exporting companies, the total number of exporting companies with whom phone screens were completed is indeed representative at the country level. At the sector level, however, the representativeness does not always hold; among the five selected sectors, the samples for the sectors 'Textile and Clothing' and 'Fresh food and agro-based products' are not representative for the total number of companies presented in the report. Nevertheless, it is likely that the representativeness per sector may actually hold better, considering the total number of companies may be smaller than in the original register provided by the Customs, which was used in the report for sample estimation but later complemented by other registers.
- In terms of company size, the report mentions that the survey is representative, which is verified at the country level for exporting companies. It also claims that 'the company size ratio also holds well within sector', but does not present the data which would allow to assess this.
- Finally, concerning the distinction between exporting companies that have a producing activity and trading agents who do not, the total population of trading agents within the total population of exporting companies remain unknown. This is explained by the fact that the question whether a company trades its own produce is only asked during face-to-face interviews which are exclusively conducted for the exporting companies who declared experiencing trade barriers in the phone screens. As a result, a precise statistic on the representativeness of the trading agents' samples cannot be verified. Furthermore, within the sample of exporting companies, the share of trading agents in all sectors and within each of them is not systematically presented.
- Concerning importing companies, the report does not provide any information on the total number of importing companies in the country, which prevents an analysis on the representativeness of the samples of importing companies.

126. Overall, the evaluation team notes that the NTM-related obstacles to trade identified at the time of the survey were generally confirmed to correspond to the reality at the survey period and no major discrepancy was found. In the case of Sri Lanka, the inception mission triangulated the information provided by the interviewees and is in a position to confirm that the survey results reflected the reality in the country in 2010.⁵⁶
127. As identified by the inception mission in Sri Lanka, the classification of the NTM obstacles was challenging to the survey companies and was sometimes conducted by ITC, as was the case in Sri Lanka. This is because Sri Lanka was the first country in which the Programme operated and aligned trainings were not yet in place yet. In other circumstances, the companies worked on the classification and then ITC reviewed to ensure for correctness, a process that became the standard approach. Part of the reasons why these difficulties existed can be attributed to the fact that the survey specialists did not always have prior experience in trade issues.⁵⁷ In addition, there is also some ambiguity in the ITC classification itself, notably for the procedural obstacles (POs). There are no written guidelines on how a description referring to several POs

⁵⁶ For full analysis, please refer to Sri Lanka Country Report, Annex 6, p. 71

⁵⁷ As shown in the evaluation survey to companies and consultants, only around half of the companies were experienced with trade issues before the NTM survey.

should be classified. Annex 10 provides examples of instances when errors of classification occurred in Sri Lanka.

128. The Programme has, however, developed an internal consultation process within the NTM team to discuss specific cases and agree on the most appropriate classification in case of doubts relative to POs, but also relative to NTMs. Discussions occurred directly or through an online platform on which team members interact. The Programme has also developed the verbal advice to classify POs as per the main vector of change identified as relevant to remove the obstacles.
129. However, to identify the vector of change, a high level of contextual knowledge is necessary, which was mainly gathered through open interviews at the beginning of the Programme. Various measures were introduced by the Programme to further contextualize the obstacles, through training of the interviewers to enhance their capacity to collect detailed and contextualized data:
- The questionnaire has evolved to capture more details on the causes of the obstacles encountered and other elements linked to NTMs (e.g.: the training teaches the interviewers to make sure that when they collect data on import licenses, they need to probe the interviewee to know which type of licence is being discussed like quotas or SPS/TBT related licences). Companies were asked to provide the reasons explaining why the measures were burdensome for them, whether the measures themselves were too strict or too difficult to comply with.
 - Additional research on the regulations was also introduced for contextualization purpose. It was required in the terms of reference that the consultants should provide “substantiated and documented explanations (literature and official documents) on the problems and challenges identified”; nonetheless according to the programme management, the depth of analysis differs in practice.
130. Overall, since the above-mentioned issues in classification and contextualization are complicated in nature, ITC has taken leadership in quality check and implementing the measure for contextualization through the support of consultants on a case-by-case basis. These measures reflect the efforts of the Programme in ensuring the quality of data analysis.

3.2.3. Engaging with Stakeholders and Knowledge Transfer

131. **With a few exceptions, the Programme has not transferred knowledge and capacity to ITC’s usual target beneficiaries (policy makers, TISIs and academia) in terms of conducting NTM-related surveys and analyzing NTM data.**
132. **The programme engaged with ministries and other stakeholders in the consultations (which was an aim of the programme) rather than focusing on knowledge transfer linked to conducting the NTM survey, which has never been an aim of the programme. This was a deliberate decision by the Programme on which approach would be used for stakeholder engagement. The objective was to enhance the capacity of survey experts, not trade experts. Still, Programme managers recognize that more engagement could have been done with TISIs and public sector representatives.**
133. As described in the ToC above, engaging with national governments and TISIs is essential to ensure national stakeholders’ early participation in the process when developing a collaborative approach to overcome regulatory and procedural trade obstacles. Local ownership is a precondition for partners identifying and implementing effective solutions to mitigate these obstacles, which is the ultimate goal of the NTM Programme. In this respect, the evaluation found ample evidence that Governments, and in particular Ministries of Trade, have been systematically engaged. However, TISIs and research institutions present a more mixed level of involvement. This type of cooperation has been subject to the interest and availability of this type of local institutions: Concerning TISIs, PalTrade (a Palestinian TISIs) implemented the NTM survey while other TISIs had only limited involvement. In the cases of

Cote d'Ivoire, Tunisia, Colombia, Nepal, Seychelles, it was the local academic or research institution who conducted the survey. However, in most of the cases, the favoured approach has been to deliberately focus on local private sector survey service providers and consultants (survey experts), not on other type of local stakeholders (such as trade experts).

134. Although stakeholders (TISIs and government when necessary) have been systematically involved in providing business register and in participating in the stakeholder workshops for survey results validation, in the majority of the cases, they have neither been associated into the preparation of the survey design, nor have they developed survey promotion activities or NTM-related services for their constituencies. The evaluation identified some exceptions though: in Malawi, the TISIs provided inputs for the survey methodology to adjust and suit to country specificities; in Palestine, PalTrade implemented the NTM survey itself, combining it with questions on companies' satisfaction for its own services. In some few cases finally, TISIs were also involved in communication with the companies to increase survey response rate.
135. **Although government institutions have gained important knowledge where the Programme's reports have been fully developed, stakeholders linked to NTM related issues have not been sufficiently involved to clearly set a context in which coordinated actions would contributed to removing NTM trade obstacles. It is important to mention that this objective of stimulating concrete actions on the part of government came in later in the Programme's lifecycle.**
136. The issue of stakeholder engagement is even more important when considering the pivotal role of stakeholder workshops in the reviewed ToC for achieving stakeholders' validation of survey findings and for building consensus among them to generate concrete and coordinated actions to address the NTM-related obstacles that have been identified through the survey, an objective that came late in the Programme.
137. In this respect, the 2013 Programme Plan formalized the need for launch events at the outset of the survey process, which are usually held within the premises of the Ministry of Trade. Once the first results of the survey are available, the NTM Programme has also progressively maintained bilateral meetings to present and better contextualize the issues identified through the survey paving the way for an improved analysis and for informed and constructive stakeholder workshops. Although recognized as good practices, the evaluation observed that these preparatory meetings have not taken place in some cases, in particular when there were not sufficient time and resources, according to NTM Programme management.
138. Concerning participation in the stakeholder workshops, the verification of the lists of participants shows the presence of policy makers, TISIs, enterprises, academia and other stakeholders in almost all the workshops.⁵⁸ Although these lists were based on broad consultation with stakeholders, the way of selection was different in each country case: The lists were sometimes prepared by the ministries, embassies and TISIs, all based on suggestions made by ITC. Companies conducting the surveys sometimes followed-up with representatives on the lists. Efforts to verify participation revealed that a high ratio of persons registered in the lists did not participate, or did not recall having participated, in the workshop. During the inception mission in Sri Lanka, none of these interviewees answered positively when asked if they were aware of the workshop, except the three local partners that were directly involved in the survey.⁵⁹ In the absence of any available list of attendees, this has raised a doubt on whether the selection of targeted participants was effective, even if it is understood that the follow-up process was at the beginning not planned.
139. In terms of the information that was brought by the NTM Programme and presented in the stakeholders' workshops, the evaluation has observed that it tends to be more concise and available over time. During phase 1, the evaluation verified that around 100-page full draft reports were circulated at the stakeholders' workshop, although it was not always in a position

⁵⁸ Exceptions being that no academia and other stakeholders seemed to be invited for Mauritius workshop and no enterprises participated in Uruguay workshop, due to the political context.

⁵⁹ The stakeholders' responses to the evaluation surveys show that 36% of policy makers, 32% of TISIs and 37.5% of academia and other stakeholders did not participate or recall the workshops.

to differentiate the version presented at the workshop with other successive drafts used as a basis for drafting the final report. Echoing the views of some stakeholders for shorter survey reports, the situation has improved with the gradual introduction of summary reports around 10-15 pages. The information was also made available on the NTM programme website.

140. The evaluation observed that these summary reports do not always include a matrix of obstacles summarizing for each main NTM-related barriers, the affected products/ sectors and the government agencies, which are accountable for them. This matrix of obstacles was developed upon the request of the Sri Lankan Government at the end of the first country survey process undertaken by the NTM Programme, to enhance the utility of the final report. The presentation of survey results in the form of a matrix enabled the Department of Commerce to coordinate and follow up on the activities undertaken by the different government agencies. Although considered since then, as a useful tool to identify accountabilities and to build consensus on activities required for mitigating NTM-related barriers, obstacle matrices have not systematically been integrated as a common practice in the information provided in the stakeholders' workshops.
141. Concerning the stakeholders' workshop format, although the time given for stakeholder workshops should be sufficient to accommodate the objectives of the workshop, it was noted that some of the workshops were held in less than one day, with sometimes the agenda shared with non NTM-related topics. The situation seems to have improved since all workshops held in 2015 and 2016 lasted for at least a full day.⁶⁰ Furthermore, since 2015 the NTM Programme has introduced in the workshop agenda, roundtable sessions dedicated to certain themes, for example rules of origin, to support more focused discussions.
142. However, concerning the use of the main recommendations that stemmed out from these discussions, the evaluation found that the programme has not developed a systematic and transparent mechanism showing how the consensus generated from the workshops was integrated into final reports. In some country reports, recommendations put forward by the stakeholders during the workshop were effectively introduced in the report; meanwhile for some other countries, stakeholder recommendations are not systematically present in the report.⁶¹ It points out the non-consistent approach that the programme used to reach the consensus for policymaking.
143. As demonstrated above, the NTM programme has introduced improvements in several areas to enhance the relevance and usefulness of stakeholders' workshops, which are a crucial link within the ToC. However, although these good practices were shared among the programme team members, the NTM Programme has not crystalized them into a common protocol to be followed by all project managers and their implementation has been uneven.
144. **The Programme has been effective in the technical implementation of TOAM, including the training of enterprises to use it. However, it has faced challenges in obtaining the required level of commitment and representativeness of the institutions participating in it.**
145. In terms of stakeholders' engagement within TOAM, it is also crucial since it is the responsibility of participating agencies to address and resolve the obstacles identified through TOAM. Therefore engaging with all relevant stakeholders to make sure TOAM is adapted to their already established problem solving mechanisms and systems is a pre-condition for the accomplishment of the NTM Programme objectives. In this respect, the evaluation witnessed a certain number of important shortcomings in Côte d'Ivoire, which was the first of the two countries where TOAM has been carried out during the period under evaluation, although these were not subsequently observed in the case of Mauritius: For example, the *Observatoire de la Célérité des Opérations de Dédouanement* (OCOD), which has been established by Customs with the private sector to discuss and solve NTM-related barriers, was identified during TOAM design stage but was neither consulted so as that TOAM could find a position to

⁶⁰ The analysis was done for the workshops held before November 2016.

⁶¹ These were the cases observed in Sri Lanka and Egypt reports. A detailed analysis for Sri Lanka can be found in Annex 6, Sri Lanka Country Report, p. 72

cooperate or complement its function, nor it became a participating agency in TOAM, leaving OCOD as a parallel system. Similarly, the NTM Programme did not sufficiently engage with participating agencies, to ensure that their existing internal decision making and communication systems were taken into consideration in TOAM to address and solve the identified NTM-related barriers. Although all participating agencies have signed the TOAM Protocol, the Focal Points who are nominated are not fully empowered to play their role of interface with TOAM.

146. As demonstrated above, it is important to point out that to be effective, NTM Programme activities although they are technical in nature, require country intelligence (knowledge, contacts, networks) and the management of local stakeholders throughout the implementation process. The evaluation observed that in broad terms, the greater the role of ITC country officers, the bigger the engagement of the NTM Programme with stakeholders. Concerning NTM survey stakeholder workshops, there were many cases where country officers were involved to identify suitable participants, to raise the seniority of policy makers participating in the workshops and to personally participate in the workshops to ensure stakeholders' buy-in and follow ups. However, these obvious benefits that country officers can bring to the process were not systematically exploited.

3.2.4. Quality of the NTM reports

147. **The reports generated through the survey's component of the Programme were not uniformly user-friendly (the SMEs considered them too strategic) nor detailed (the government and TISIs representatives would have appreciated more forward looking and problem solving analysis), relied too heavily on statistics and came too late in the implementation process to really be useful. In some countries, the reports were not developed.**
148. Perceptions about the user-friendliness of the reports developed vary according to the category of stakeholder. In general terms, public and academic institutions found the report easy to understand. They are familiar with the language used and the issues developed in the document and appreciate a well-structured document with clear charts and tables. On the other hand, TISIs and enterprises found the report difficult to understand. This indicates that the design of the NTM reports were more adapted to the needs and capacities of Governmental and university professionals. The business sector is the primary stakeholder that is to benefit from removing the NTM-related obstacles; in this context, special attention should have been paid to the issue of user-friendliness from the business sector perspective, including TISIs.
149. In terms of format of the report, the general opinion was that it should have included explanatory examples and case studies. One of the TISI stakeholders also expressed interest in understanding the experience of other countries in overcoming the obstacles.
150. The fundamental issue in user friendliness is that the subject matter is highly technical and difficult to understand for the general public. Although the Programme has briefly explained in the introduction of the reports the terminology and definition of NTM categories, a reader with no prior background on WTO rules may find it difficult to understand the explanation, such as "technical requirements [refer to] technical barriers to trade (TBT) or sanitary and phytosanitary measures (SPS)".⁶² Furthermore, the distinction is not straightforward between some terms and easily causes confusion, such as "technical measures" and "technical regulations", with the former being a broader category comprising the latter. Although the reports also provided a technical note in the appendix, confusion is sometimes created as there were multiple versions of classifications,⁶³ and the graph and explanation texts do not always come from the same version.

⁶² ITC business survey on NTMs in Egypt, p.2.

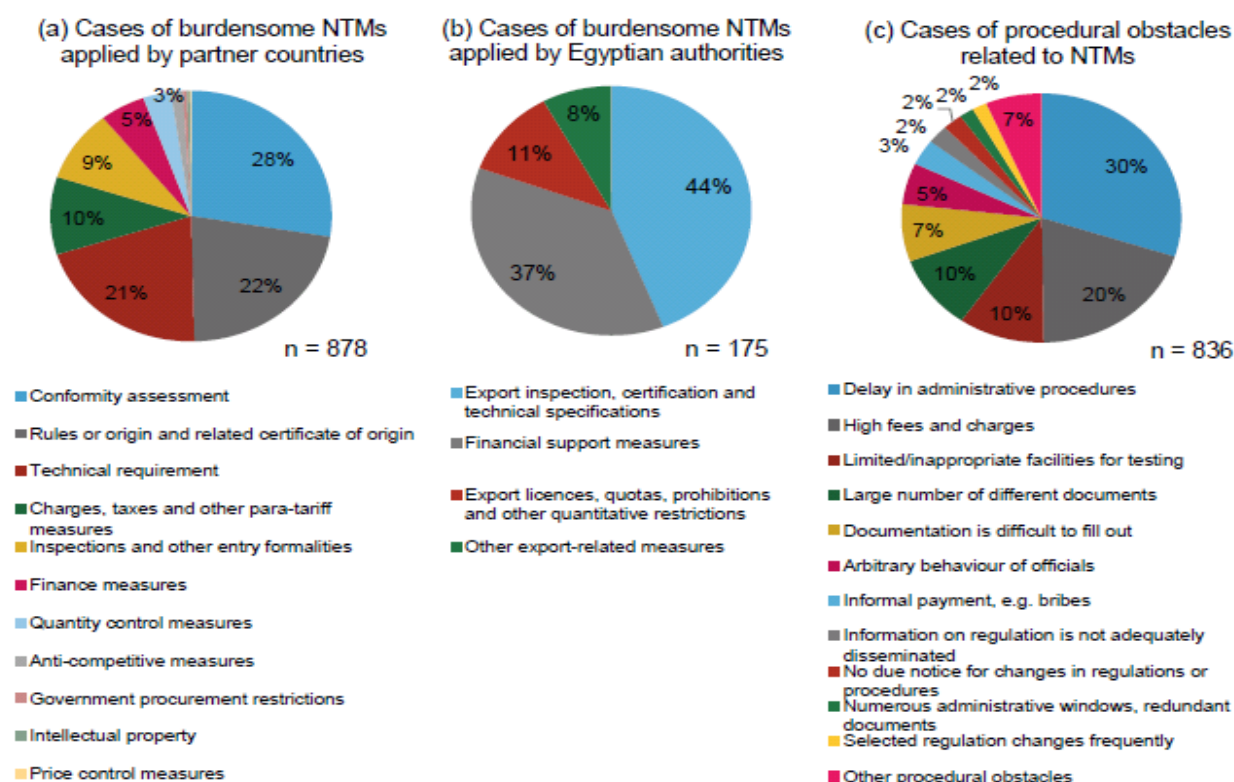
⁶³ The versions used in the reports are Multi-Agency Classification in 2009 and 2012 as well as ITC internal classification in 2012 and 2015. The main difference between the Multi-Agency versions and the ITC versions are in Chapter A and B, where Multi-Agency versions use "Sanitary and phytosanitary measures (SPS)" and "Technical Barriers to Trade (TBT)", and the ITC versions use the heading "technical requirement" and "conformity assessment". "Technical requirement" refers to the regulations

151. The multiple classifications used by the reports further add confusion for the readers. As mentioned in the programme approach, the reports differentiate three types of obstacles: NTMs, procedural obstacles (POs) and problems with trade-related business environment (TBE). While NTMs are defined as regulations, POs are problems related to the implementation of regulations, and TBE appears to be similar to POs but unrelated to specific NTMs. Therefore, there are two classifications presented in the report: one for NTMs and the other for POs and TBE. Together with the different categories of NTMs, the reports present a rich but complex picture.
152. The survey reports mainly adopt a quantitative approach in presenting the information, including the share of company affected by NTMs and related POs, the scope of influence of each NTM and PO, and the geographic origin of the obstacles. This approach is appreciated by the government and academic institutions.
153. The shares of companies affected by NTMs and related POs is presented in percentage. It is calculated according to the number of companies interviewed that experienced NTM and related POs. They are further analysed by sector and by size. The percentage of companies affected could provide policy makers with a clear idea on the occurrence of NTM in businesses and the type of companies most influenced. For academia and researchers, the statistics could provide rich material for different research purposes.
154. The most reported NTMs and POs are also revealed through this approach. The reports calculated the scope of influence of each NTM and PO based on its share in the total cases reported (see below Figure 3 for an example).⁶⁴ The most problematic obstacles were treated as priority for analyses as well as for recommendations. Besides the aggregated results at country level, the most reported NTMs were also classified at sector level. However, the sectors were not always defined in the same manner across countries. In some reports, the sectors were broadly defined, such as agro-food and manufacturing; in other reports, they were more detailed and close to product level, such as tea, coffee, clothing and textile.

requirements for SPS and TBT, and “conformity assessment” is the proof that product has met the regulations, which is usually a main obstacle discovered in the survey country and sometimes even more burdensome than meeting the regulation itself.

⁶⁴ As per NTM survey methodology, a case is a NTM or PO applied on one product by one country and reported by one company. Therefore, if a company reported a NTM applied by one country to its three products, it would be calculated as three cases; if two companies reported the same NTM applied by the same country to the same product, it would be calculated as two cases. If a company reported a NTM together with a PO, it would be counted as both NTM and PO. For example, if a company reported that testing facilities are lacking in the country and the product has to be sent to foreign country to obtain the certificate, thus incurring high cost, it would be treated as 1 case of NTM (conformity assessment) and 2 cases of PO (infrastructural challenges and payment).

Figure 3: Example of trade obstacle types presented in the NTM survey reports



Source: ITC business survey on NTMs in Egypt (2011).

Note: Cases regarding the trade-related business environment are not included.

155. The reports also differentiate NTMs according to origin, whether they were from home country, partner countries or transit countries (see Table 3 below or an example).⁶⁵ In the cases where the source of obstacles was abroad, the reports mentioned the countries identified by the companies. In the case that obstacles appeared at home, the reports showed the national agencies associated with the obstacles.
156. The quantitative approach at its current level can be useful for some categories of stakeholders to take action. For example, the Ministry of Trade can coordinate among agencies to address obstacles occurred at home. TISIs with trade intelligence functions can use the reports to raise awareness for the obstacles that businesses face domestically and abroad, and those with trade diplomacy function can use the evidences in the report for lobbying the authorities to address the obstacles.

⁶⁵ According to the NTM classification, importers and exporters both face obstacles from inside and outside the countries, but the type of measures is different. Importers are facing import related measures applied by home country, and export related measures applied by other countries where they import. In the contrary, exporters are facing export related measures applied by home country and import related measures applied by other countries where they export.

Table 3: Example of NTM origin presented in the NTM survey reports

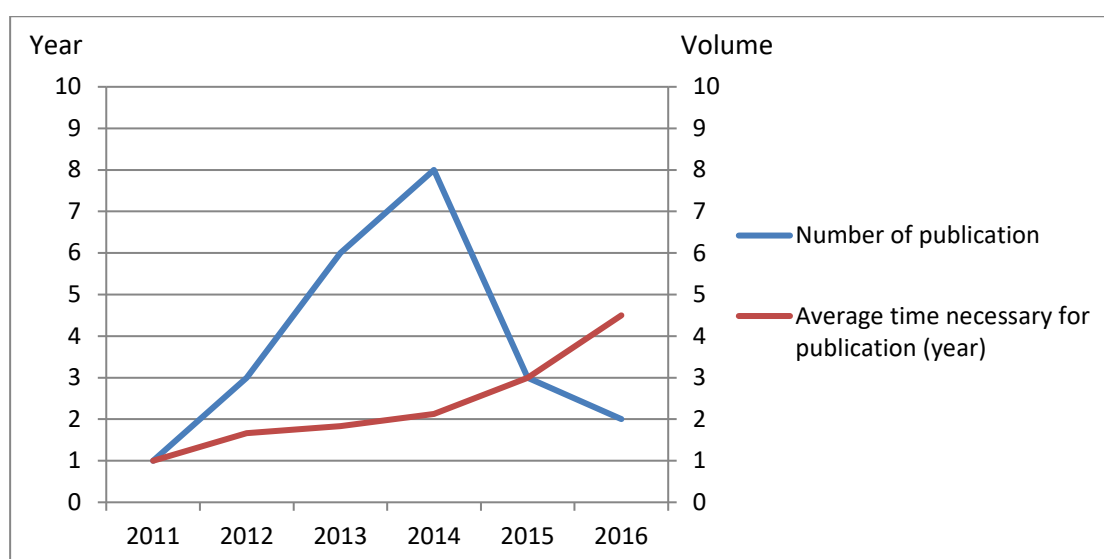
Partner country	Export value ^a		Surveyed companies			Reported NTM cases	
	Rwandan export value in 2010 (US\$ '000)	Share in total Rwanda export value	Number of surveyed companies exporting to this destination ^c	Number of surveyed companies reporting NTMs applied by this export destination	Share of affected companies among those exporting to this destination	Number of product-specific NTM cases reported to be applied by this destination	Share in total reported product-specific NTM cases
Kenya	38 811	28.4%	6	2	33.3%	5	3.8%
Switzerland	26 473	19.3%	11	4	36.4%	4	2.9%
EU ^b	23 363	17.1%	39	24	61.5%	52	38%
DRC	16 586	12.1%	11	3	36.4%	4	2.9%
United States	7 289	5.3%	28	19	67.9%	25	18.2%
Uganda	6 188	4.5%	8	2	25.0%	5	3.6%
Burundi	4 936	3.6%	16	11	68.8%	16	11.7%
United Republic of Tanzania	3 510	2.6%	9	3	33.3%	7	5.1%
Japan	2 181	1.6%	8	5	62.5%	7	5.1%
South Africa	1 677	1.2%	3	2	66.7%	2	1.5%
Other	5 861	4.3%	16	8	50.0%	10	7.3%
Total	136 875	100.0%	155	84	54.2%	137	100.0%

Source: ITC business survey on NTMs in Rwanda (2014)

157. However, relying primarily on a quantitative approach has its limits, as the NTMs and POs are often context specific. The stakeholders noted that often the identified NTMs and POs were already known, but what was missing was an analysis of their context and sources, whether at home or abroad. Measuring business perception per se does not bring clarity on what the concrete problems behind the classification are, as business perception only reveals one side of the story to the knowledge that companies possess. The report at its current form does not empower the operating agencies to take action.
158. For the obstacles faced abroad, the issue of contextualization is even more critical. The obstacles inside the country can be contextualized by the national agencies, but the obstacles originated abroad cannot be contextualized by any national actor, as importers and exporters only know the phenomenon of the obstacles and national agencies do not know the cause of the obstacles outside the country. The lack of contextualization for obstacles abroad creates information asymmetry, which prevents the reports from providing sufficient information for the national agencies to address them through negotiation. This again points to the fact that more multi-country approaches would have generated better results. Had the reports been developed in coordinated efforts with multiple trading countries, the contextualization of the "abroad" obstacles would have been possible.
159. The stakeholders also expressed the need for more product specific analysis. For TISIs looking for export and import promotion opportunities, there is a need for more targeted information on the products and on certain markets, notably China and India. Nonetheless, the reports do not provide much information on the obstacles in these potential markets. The regulations collected by the NTM database better serve the purpose of export and import promotion, but stakeholders are largely unaware of the database.

160. As a result, stakeholders considered the conclusions and recommendations of the reports too vague and too general. Lacking an analysis of the causes and context of the obstacles, the report missed, as a consequence, instrumental recommendations determining precisely the necessary changes to fix the problems and the path to do so, domestically, as well as with external partners. This is reflected in stakeholders’ assessment on the utility of the recommendations, which is considered lower by the operating agencies and TISIs involved in export and import promotion.⁶⁶
161. Finally, there is a general view among stakeholders that the survey reports came out too late. It took on average 2 years for a survey report to be published once the survey process was launched. Furthermore, as time passed, the time needed to develop a report increased (even though the number of reports published diminished—see the graph below). This situation augmented the risk of ending up with outdated information with little value for stakeholders. The Programme management confirmed that the reports were not considered a priority deliverable as it was not stated in the MoU signed with the donor.

Graph 3: Average time for publication of survey reports



Source: calculated by the evaluation team based on the time from survey initiation to publication

162. On a different note, it is important to acknowledge that, besides the standard NTM reports at the country level, the Programme also explored and developed various related analyses, using the data collected for a broader purpose. These include surveys at the regional level (in Arab States and EU)⁶⁷ and an aggregate analysis at the global level analysing all the country data collected.
163. The meta-analysis, “The Invisible Barriers to Trade – How Businesses Experience Non-Tariff Measures”, analyzed 23 country data collected before June 2015. Based on this cross-country analysis, the study provides insights on the type of company, countries and sectors most affected by NTMs, and the most burdensome NTMs and their origins respectively for agriculture and manufacturing sectors, on a global scale. It is a useful empirical evidence for the international community including academia and researchers to understand the NTM obstacles faced by the private sector in general, and to tackle the prominent issues revealed by this study, for example the high level of NTMs among regional partners despite the

⁶⁶ In the evaluation survey sent to policy makers and TISIs, Customs and SPS/TBT issues related agencies (Standards bureau, Ministry of Agriculture, Ministry of Health) gave lower rating for the quality of recommendations (average score 3.75, 3.6 respectively) comparing to the Ministry of Trade (average score 4.1); and TISIs with export and import promotion function rated the quality of recommendations less good (average rating 3.4) than trade intelligence and trade diplomacy TISIs (both with average score 4).

⁶⁷ A regional study was also conducted in the scope of the ECOWAS region, but did not publish during the evaluation period.

signatories of regional trade agreements. Nonetheless, this was the only meta-analysis conducted by the programme, and concentrated mainly on NTMs for export. The programme indicated in this study further possibilities to exploit the richness of cross-country data, for instance through examining the importers' perspective and analysing firm level data in further depth.

164. In addition, two survey reports were dedicated to analysing NTM-related obstacles faced by businesses in the regions of Arab States and the EU. The two reports adopted different approaches and focuses: the Arab States regional survey was a synthesis of the existing country surveys,⁶⁸ focusing on obstacles preventing intraregional trade and regional integration. On the other hand, the EU survey was newly conducted in EU's 28 member countries, and concentrated on obstacles to export outside of EU markets.
165. The Arab States regional survey puts together findings from the four country surveys conducted previously, and highlights the regional trend comparing to obstacles faced in other partner countries. The programme also followed the model for national surveys to end the process through a stakeholder workshop- a high-level roundtable gathered officials from ten Arab countries in this case- to generate survey recommendations. Although building on the existing surveys, the country selected all have their special context and the extent the synthesized survey results represents the region might be arguable,⁶⁹ the regional study and roundtable successfully attracted the attention of USAID and regional partners, and led to a project aiming at overcoming NTM-related obstacles in the region.⁷⁰
166. The EU survey approach, on the other hand, was designed to have a representative sample in the region, but did not include recommendations in the report. To a certain extent, the concept of the EU survey was not substantially different from the national surveys, as it mainly focused on analysing obstacles faced by EU exporters vis-a-vis other trading partners.⁷¹ Nonetheless, as mentioned above, it adds a unique value to the NTM surveys from a market access point of view for developing countries, as EU represents the voice of a major importer, accounting for almost 15% of the world's imports.⁷² Although importer's perspective was not the focus of the report, since half of the exporters were also importers of intermediate goods, the EU survey echoes the findings in many national surveys in developing countries that the major hurdle to export to EU lies in technical constraints, namely compliance in product quality standards.

⁶⁸ The country surveys already conducted were in Egypt, Morocco, the State of Palestine and Tunisia.

⁶⁹ For example, the State of Palestine faced most obstacles from Israel, while Morocco faced more NTM issues from the EU.

⁷⁰ See below Section 3.2.8 Follow up action for more details on the project.

⁷¹ The main differences lay in technical aspects of the survey, including sampling methodology, sector definition etc.

⁷² Figures in 2016, see WTO, Trade Profile for EU 28 countries,
<http://stat.wto.org/CountryProfile/WSDBCountryPFView.aspx?Language=E&Country=E28>

Table 4: Summary of report utility for different category of stakeholders

Usefulness for action (Yes/no, reason)	Government agencies			TISIs			Enterprises	Academia and researchers
	Ministries of Trade	Customs	SPS and TBT agencies ⁷³	Trade intelligence	Trade diplomacy	Export/ import promotion		
Obstacles at home	Yes, through coordinating agencies to address the issues (example: Sri Lanka Department of Commerce used the report for inter-agency discussion)	No, need analysis of the cause (example: Jamaica customs delay due to regulation)	No, need analysis of the cause (example: Sri Lanka Standards Institution has no fund to expand services on testing and certification)	Yes, nice to have for raising awareness	Yes, evidence for lobbying	No, need action	No, not user friendly	Yes, as research inputs
Obstacles abroad	No, no contextualization for agencies abroad	No, no contextualization for agencies abroad	No, no contextualization for agencies abroad	Yes, nice to have for raising awareness	Possible, the more sector specific the information is the more useful	No, not enough information on potential market/ more interested in regulations	No, not user friendly	Yes, as research inputs

Source: summarized from the section 3.2.4

⁷³ Standards bureau, Ministry of Agriculture, Ministry of Health

3.2.5. TOAM deployment

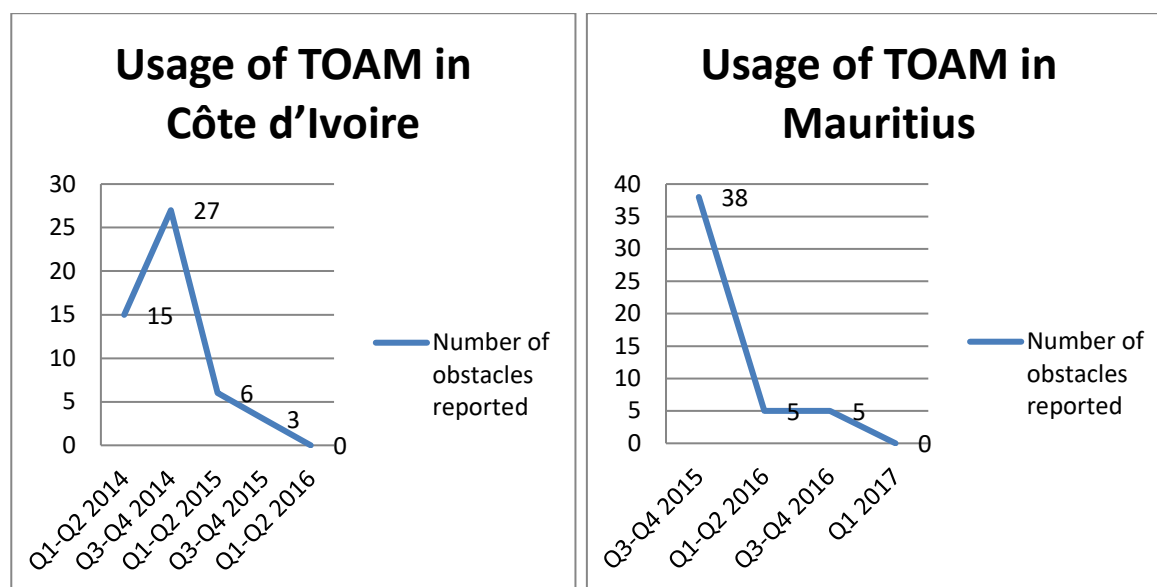
167. The direct support that the NTM Programme provided in TOAM include three aspects: the provision of an online trade alert platform, a training programme for the users on how to use the platform and an institutional mechanism established by a protocol.
168. Concerning the online trade alert platform, stakeholders rarely question its technical adequacy. The system is cleverly designed and allows users to easily post complaints. Companies in Côte d'Ivoire reported some minor technical issues⁷⁴ but in general, stakeholders provide good feedback for the platform as a portal for conveying complaints of enterprises.
169. Training needs for the use of TOAM are twofold: The first step is to ensure that each National Focal Point, the national Chamber of Commerce who is responsible for overall management of the TOAM system, is able to process the alerts submitted by companies. National Focal Points need to understand how to administer the platform, including the functionalities of the platform and the information needed to verify the reported obstacles (where, when, how, type of obstacle etc.) in case the user does not provide sufficient information. In this regard, National Focal Points in both Côte d'Ivoire and Mauritius indicated that ITC's training and support were effective.
170. The NTM Programme has also trained the enterprises that have been previously participating in face-to-face interviews during the NTM survey process. Focusing as a priority, on those enterprises that have already reported being confronted to an NTM-related barrier is a good practice. In Côte d'Ivoire, BNETD, the institution that implemented the survey also carried out training with the companies that had participated in the survey in the of promotion phase of TOAM. Of the 285 who were interviewed for the NTM survey, 100 companies were trained about the use of the platform in individual interviews. In Mauritius, the trainings were opened up to the member companies of the Chamber; it was considered beneficial to present TOAM as part of the services provided by the Chamber. However, in both Côte d'Ivoire and Mauritius some companies participated multiple times in the trainings. This raises an issue on whether the trainings are organized in the most efficient way possible.
171. Interviews with companies raised questions about the effectiveness of training in Côte d'Ivoire. Some of the trained companies did not seem to know how to attach a document on the platform and they did not necessarily advise other companies to use the platform. Also, several TISIs that participated in these training sessions reported that they did not clearly understand how the information was processed once it was entered in the platform and therefore did not communicate to their members about TOAM.
172. The institutional mechanism was established by a protocol: the mechanism is at the core of TOAM design and is considered as its competitive advantage. It brings together agencies linked to the field of NTMs by signing an inter-agency protocol and establishes a supervisory committee: in Côte d'Ivoire the CNSOC (*Comité National de Suivi des obstacles Au Commerce*), chaired by the Ministry of Commerce, Handicrafts and Promotion of SMEs, and in Mauritius the NMC (National Monitoring Committee), chaired by the Ministry of Foreign Affairs, Regional Integration and International Trade. The committees are expected to meet quarterly to take stock of the obstacles reported and monitor the resolution process of the obstacles.
173. Nevertheless, in Côte d'Ivoire the number of CNSOC meetings were limited. Some of the meetings were organized in conjunction with ITC-provided training sessions for companies and the time for substantive discussion were hence absorbed by the trainings. In Mauritius, the meetings were separated from the trainings but they were not held regularly.

⁷⁴ These were mostly related to providing documents proofing the obstacles they face, for example, the documents larger than 4MB cannot be attached.

Evaluation of the Non-Tariff Measures Programme

174. Despite being largely effective in terms of direct support, two major drawbacks are observed hindering the effectiveness of TOAM:
175. Drop of usage: in both Côte d'Ivoire and Mauritius, the obstacles reported have substantially dropped within one year after launched. In Côte d'Ivoire, the usage of TOAM reached the peak when it was launched in 2014, but declined rapidly thereafter. The same trend appears in Mauritius, where the TOAM officially launched in September 2015 (as shown in Graph 4 below). The drop of usage decreases the chance for the obstacles to be noticed and resolved by the network of institutions.

Graph 4: Usage Trend of TOAM



176. Obstacles unresolved: the unresolved obstacles were referred to by both Côte d'Ivoire and Mauritius stakeholders as a major reason for which companies have lost confidence in the mechanism and for which the usage has dropped.
177. In Côte d'Ivoire, only 5 out of 32 obstacles published were resolved, giving a resolution rate of 15.6%. In addition, the obstacles that have been solved are mainly delays in administrative process that could be addressed solely by the National Focal Point Chamber of Commerce. Those that are reported as "unresolved" focus on issues that are structural or responsible by other agencies, in particular problems resulted from a regulation, information and transparency issues, informal payment and discriminating behaviours of officials, and finally delays due to other agencies, especially the Customs and the Single Window operator Webb Fontaine. This echoes the above analysis that points out the insufficient engagement of TOAM with the participating agencies.
178. In Mauritius, the resolution rate is much higher: 56% (14 among 25) of the obstacles published on the TOAM website were shown solved. These resolved obstacles cover different issues and both for import and export. Nevertheless, after closely examining the obstacles considered resolved, it is noted that a majority of them merely provided information or justification for the obstacle reported (such as customs clearance fee and time requirement), but did not necessarily help the enterprises to overcome the issues appeared burdensome to their business. Overall, the cases where TOAM lifted the obstacles by changing the situation faced by companies are limited to 6 cases, accounting for only 29% among all the obstacles resolved in Mauritius and Côte d'Ivoire. These cases and the change triggered by the resolved obstacles will be analysed below in Chapter 3.5 Impact.

3.2.6. NTM Database operation

179. Overall, the updating of the NTM Programme’s database was not frequent enough and the new information integrated was not sufficiently detailed to really be useful for stakeholders. There were in addition issues with the timeliness and accuracy of the data presented on the database. Nonetheless, there is an overall increasing trend in web traffic in the database, although not necessarily from the targeted country beneficiaries.
180. Several issues have influenced the NTM data in terms of its completeness, timeliness and accuracy of NTM data. Time and frequency for updating the data proved to be irregular, and there was no clear logic identified behind the frequency for update and countries selected for update (as shown in Table 5 below). Although in the earliest MOU with DFID for phase 1, the frequency for update was articulated according to the country's share in world imports,⁷⁵ this logic was removed from the later revised logframes, and the evaluation could not identify any alternative logic.

Table 5: NTM Country data update frequency

Country name/ country group (number of countries)	Frequency for update	Data collection years	Number of years collected
EU countries (28)	Annually	2010, 2011, 2012	3
Arab countries (4)	2-3 years	2011, 2014, 2016	3
India, Pakistan	1-3 years	2012, 2015, 2016	3
Turkey	2-4 years	2010, 2012, 2016	3
Algeria, Israel, Jordan	2 years	2014, 2016	2
Qatar, Saudi Arabia	1 year	2015, 2016	2
Jamaica	4 year	2011, 2015	2
Antigua and Barbuda	1 year	2015, 2016	2
Sri Lanka	4 years	2012, 2016	2
Latin America and Caribbean countries (18)	N/A	2012/ 2015	1
China, Japan, Hong Kong	N/A	Various	1
LDCs (10)	N/A	Various	1
Others (16)	N/A	Various	1

Source: Market Access Map, <http://www.macmap.org/SupportMaterials/DataAvailabilityMfn.aspx>

181. In terms of the types of data collected, both import and export regulations were collected for the countries in phase 2, whereas in phase 1, data for many countries only contained import regulations. In addition, the NTM data collected covers 12 out of 16 types of regulations classified by the NTM nomenclature. However, NTMs in distribution restrictions, restrictions on post-sale services, subsidies, government procurement restrictions and intellectual property were not collected, as these regulations are usually not applied on product level and adds on difficulty to collect.
182. In terms of completeness, the data do not always contain the same level of detail. For example, while some country data present summary and contextual information for the regulation, such as the institutions in charge and the original documents, the import regulations of China do not present these information; the web links to the sources of these regulations are also mostly expired. This means, for instance, a tire exporter who wish to access to the Chinese market

⁷⁵ As stated in the first MOU for programme phase 1, the frequency for update was depending on the country's share in world imports: "data on top-20 major importing countries will be updated annually; others will be updated every two or three years".

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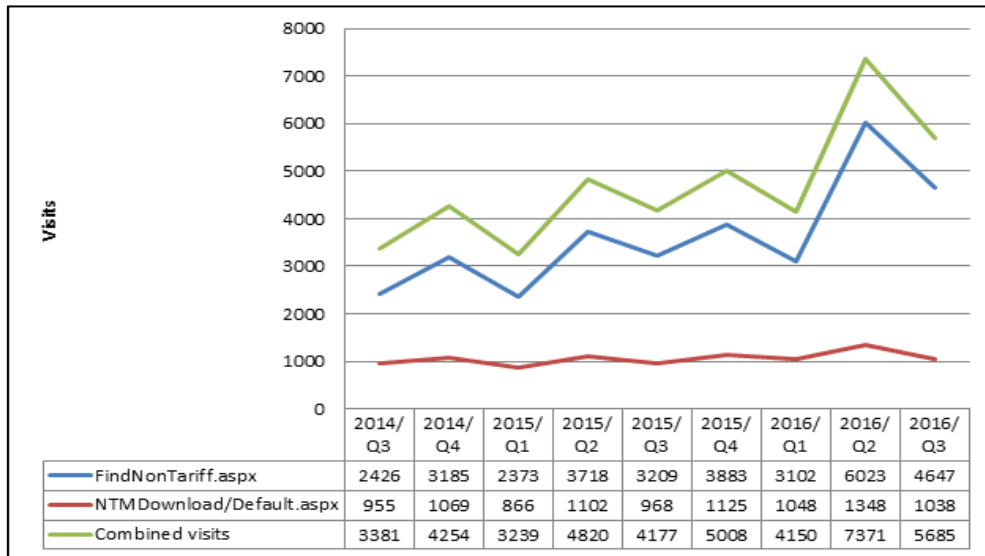
can only see the titles of the regulations, such as “ Standardization Law of the PRC”, besides the NTM requirements and their definitions.

183. Moreover, the NTM definitions provided merely explain the classification, but do not explain the regulation per se. Seeing this definition, the exporters or importers can learn the definition of a NTM under the MAST classification, but are still not informed of the exact restriction of the regulation. Taking the above-mentioned example, a tire exporter may be aware through the database, that China prohibits certain substances in tires, and requires testing against the regulation; however, the exporter is not informed of the exact substance to test for or avoid using.
184. In terms of accuracy, the data need to be timely updated to reflect the current requirements of the countries; otherwise the users can be misled by outdated information. For instance, in the database, the regulations for exporting tea from Malawi present the requirement for export license. This was the case when the data was collected in 2011; nevertheless, this regulation has been lifted since 2013 by the Malawi Ministry of Industry and Trade.⁷⁶ In such circumstances, the database itself provides inaccurate information for the users, and can potentially create an adverse effect that prevents exporters from trading to avoid the burdensome requirement.
185. Besides the issue of data completeness and accuracy, there are other issues influencing the user friendliness of the database. The first issue lies in technicality. Although the users do not need knowledge on the NTM nomenclature to search for data, the NTM requirements specified in the regulations are codified and presented following the MAST classification. This is complicated for companies which are not familiar with terms used in the NTM nomenclature, such as “conformity assessment related to TBT” (NTM code B8), or “special authorization requirement for SPS reasons” (NTM code A14). Although the NTM team has introduced the summary of regulation and definitions of the specified NTMs, they are not fully integrated to facilitate the users’ understanding on the regulation, as explained above.
186. The second issue is language. The original documents of the regulation, if provided, are usually in the language of the country that applies the measure, which is not necessarily understood by the exporters. In such cases, exporters will have to either rely on the summary, which is not always provided or not detailed enough, or spare extra costs to translate the documents.
187. Finally, besides viewing the NTM regulations on Market Access Map, users can also download these data to conduct advance analysis. The downloaded raw data contains all the information available on the website. As presented in Table 6 below, the NTM data has attracted on average 1,600 visits⁷⁷ every month, among which 22% were visiting the data download page.

⁷⁶ In June 2013, the Ministry of Industry and Trade announced the removal of this requirement for a total of 15 products, including tea. This was documented by the programme team, as the requirement for export license for agriculture products was identified in the Malawi survey report as the most problematic NTM, and recommended removal in the survey report. See chapter 3.5 Impact for more detail.

⁷⁷ According to UNICC, the provider of the monitoring tool for the Market Access Map, a visit is calculated when a visitor begins viewing the first page under the NTM module, until the visitor leaves the website, or stays inactive for more than 30 minutes. Therefore, a visitor can generate several visits under this tracking system, the number of visits does not necessarily equal to the number of visitors, and the number of visits to the download page does not necessarily equal to the number of downloads.

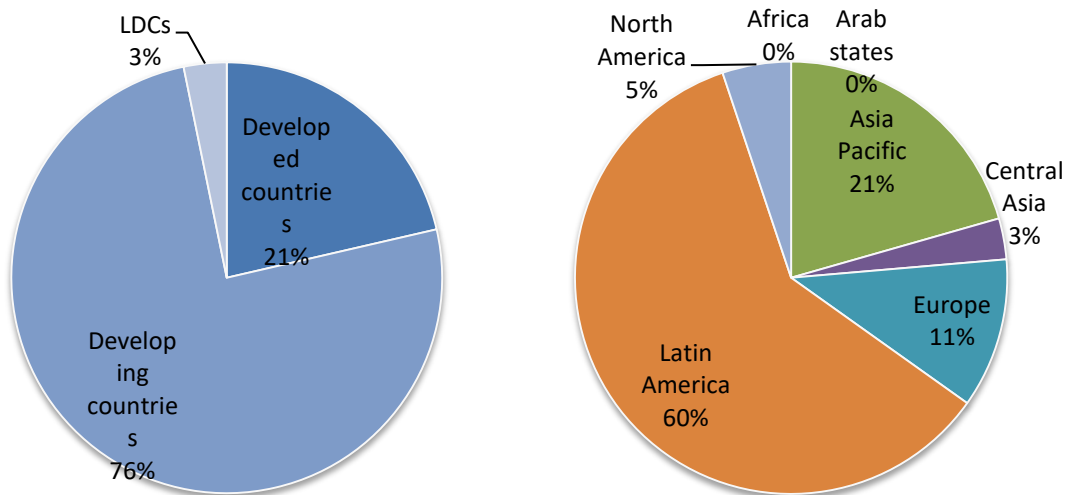
Table 6: Web traffic to Market Access Map NTM data



Source: data provided by the Macmap team

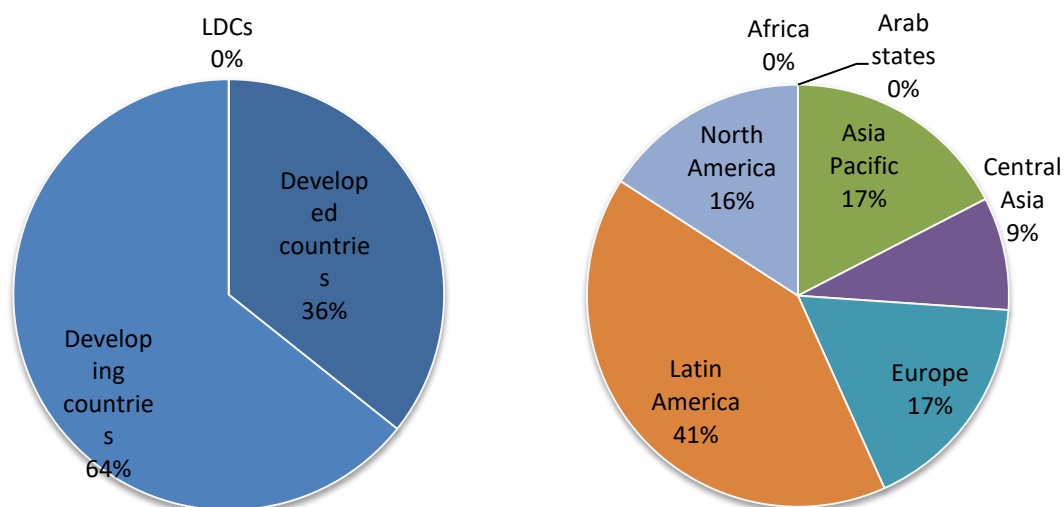
188. Breaking down the user statistics, it is observed that more than 75% of the visits were from the developing world, although traceable visits from LDCs were less than 3%. In terms of regions, more than 60% of the visits were from Latin American countries; meanwhile, no visits from any African or Arab country were recorded.⁷⁸ For the visits to NTM data download function, which allows users to download the NTM data for advanced research and analytical purposes, the visits from developing countries decreased to around 64%. No single LDC or African country has more than 1% among all users. In addition, developed country users increased for 15% when it comes to downloading and manipulating data for advance analysis. The country, which accumulated most visits to the download page, was the United States. This result presented a gap for the NTM database to serve the need of LDCs for NTM related information.

Graph 5: 20 countries with most visits to the NTM database



⁷⁸ Calculated from 2016 Q3 user data provided by the Macmap team. The dataset only shows the 20 countries with most visits for the NTM module and NTM data download page; these countries accounted for 85% of the visits for the NTM module and 80% of the visits to NTM data download page.

Graph 6: 20 countries with most visits to the NTM database download function



3.2.7. Product Dissemination

189. **The Programme has faced shortcomings in terms of disseminating information and data generated, whether in the form of reports or through database. Thus, although in many cases, quality data has been produced, it did not always reach the target audience.**
190. Attention to diffusion channels for the different NTM programme products seems clearly insufficient. Concerning products related to NTM surveys, a significant share of stakeholders having participated in the stakeholder workshops and answered to the evaluation surveys declared having never seen the National Survey Report, which is the NTM Survey final product⁷⁹. This was confirmed by the evaluation missions conducted in Sri Lanka and Côte d'Ivoire, where even the main partners of ITC did not necessarily receive this report, including the Ministry of Commerce of Côte d'Ivoire and the local institutions implemented the survey in both countries.
191. Concerning enterprises, the NTM Programme management explained that the National NTM Reports were mainly distributed via email to all the companies who provided their email addresses during the face-to-face interviews. Nevertheless, the evaluation was not in a position to gather evidence that national NTM reports per se have enabled any type of follow-up with local stakeholders.⁸⁰
192. Concerning the NTM data disseminated through a module under the Market Access Map, evidence collected by the evaluation indicated that stakeholders are largely unaware of its existence. On the one hand, the monitoring system does not track the user types and user feedback for the database.⁸¹ This prevents more in-depth analysis of the client the database served and limits the opportunity for the programme to tailor and improve their services

⁷⁹ These were 42% of policy makers, 44% of TISIs and 56% of the academia and researchers.

⁸⁰ During the evaluation missions, stakeholders were unanimous in expressing preference for receiving hard copies rather than soft copies of the National NTM Report, and, in the case of soft copies, the preference for receiving the report attached to the email than to have to follow a link to download it.

⁸¹ The user types are only recorded at the level of Market Access Map, when users register for an account that allows access to all the market analysis tools, including Market Access Map, Trade Map, Investment Map, Standards Map and Procurement Map; the account then traces which tools the users access, but does not keep track for the use of sub-modules. Likewise, the user feedback is collected together with other market analysis tools with results not being attributable to specific modules such as the NTM database.

according to the need of the users. On the other hand, nearly no beneficiaries met in the inception missions or interviewed know about the database;⁸² interviewees met in Sri Lanka massively do not know about the Market Access Map; this might be partly explained by the fact that this module was still under development at time of the national survey. Nevertheless, further interviews with Mauritius stakeholders, despite indicating some awareness on the Market Access Map, also shown unawareness of the NTM data module.

3.2.8. Follow up Actions

193. **Actions to be taken on the basis of the information generated through the Programme have been defined in certain circumstances, and in a few context, projects have been financed (by ITC and other donors) to address trade obstacles identified by the Programme. However, although the Programme has fulfilled the commitments the ITC made to the donor, it has not uniformly fostered actual consistent and relevant follow up on strategic information it helped generate.**
194. Component 3, Initiatives to mitigate NTM-related trade obstacles was introduced in programme phase 2. The purpose of this component was to follow up and overcome the obstacles identified in the NTM survey. As analyzed in ToC, the programme has matured its approach from research and awareness-raising to supporting stakeholders to address the NTM related obstacles identified. This component is therefore at the core of an advanced programme theory of change and includes the implementation of follow-up actions. This corresponds to the fourth intermediate outcome of the 2016 Theory of Change where “actions are taken” and partners use effective solutions to mitigate regulatory and procedural trade obstacles and improve support to SMEs on how to deal with NTMs.
195. However, from an accountability perspective, the NTM Programme has used a narrower definition revealed in the MOU with DFID for phase 2, which only contains the scoping of follow-up actions, as “number of countries in which tailored follow-up initiatives/actions to solve the identified NTM-related obstacles to trade have been clearly drawn up in a work plan/document”. This shows that the NTM Programme commitment to DFID is limited to intermediate outcome three “consensus and feasible plan to act” by which partners develop a collaborative approach, options to overcome regulatory and procedural trade obstacles without compromising the legitimate objective of measures. In analyzing component 3 the evaluation considers the broader definition of follow actions, which issued in the 2013 Programme Plan and 2016 Theory of Change, while taking also into account the scope of commitment established in the MoU with DFID.
196. At the start of phase 2 in 2013, the programme organized in ITC an inter-divisional workshop to discuss the possible settings for follow up implementation. The intention was to raise in-house awareness and mobilize expertise to formulate projects that address the obstacles identified by the NTM survey. The proposed mechanism was a USD 70,000 seed fund to support ITC regional offices and technical sections to formulate the corresponding follow up actions. According to the NTM programme management, these resources were allocated to proposals on the basis of criteria such as good quality, relevance to NTMs and high potential for impact, although the evaluation could not find evidence of a documented and transparent selection process. In any case, when examining the follow up actions as reported at the end of phase 2 in the Project Completion Report submitted to DFID, these include a variety of initiatives:
- Trade strategies (Nepal, Malawi), negotiations (e.g. Tunisia), and work plans of government committees (e.g. NTB committee Philippines);
 - Projects to enhance public-private dialogue on NTMs and related trade obstacles (Côte d’Ivoire, Mauritius);

⁸² The only exception was in Sri Lanka, an academia used the database in conducting research.

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- Capacity building initiatives in the area of product quality management (Sri Lanka, Senegal, Jamaica);
- Projects to enhance the availability of information on NTMs and related procedures (Mediterranean, Bangladesh);
- Regional integration initiatives (Arab States, West Africa) and other technical assistance projects (e.g. Morocco); and,
- A number of projects and concept notes designed to be used at the fundraising stage and/or awaiting implementation (Comoros, Kyrgyzstan, Nepal, Madagascar, ASEAN)".⁸³

197. Among these initiatives, the projects that have been implemented have been categorized in the table below, into the four types of intervention areas defined in the Theory of Change (quality issues, transparency and dialogue, trading process and negotiation), although certain projects can contain various interventions addressing more than one area, since the issues addressed are often inter-linked. The detailed interventions of these projects could be found in Annex 8.

Table 7: Follow up projects implemented to address NTM-related obstacles

Project name	Funder	Implementation team	Areas of intervention
Sri Lanka: Improving safety and quality of the Sri Lanka fruits & Vegetables project	STDF	Export Quality Management (EQM)	Quality
Jamaica Addressing NTMs for enhanced agricultural export competitiveness through quality and trade facilitation reforms project	NTM	Office for Latin America and the Caribbean (OLAC)	Quality
Senegal technical assistance on quality infrastructure	NTM	EQM	Quality
Côte d'Ivoire Trade obstacles alert mechanism (TOAM)	EU (PACIR)/ NTM	MAR	Dialogue and Transparency
Mauritius Trade obstacles alert mechanism (TOAM)	NTM	MAR	Dialogue and Transparency
Bangladesh Transparency in Trade Procedures project	NTM	MAR	Dialogue and Transparency, Trading process
Euro-Med Trade and Investment Facilitation Mechanism (TIFM) project	EU	MAR	Dialogue and Transparency, Trading process
Arab States: Coordinating a regional approach to overcoming trade obstacles related to NTMs project	USAID	Office for Arab States (OAS), MAR	Dialogue and Transparency, Quality, Trading process, Negotiation
UEMOA: Support to Trade Competitiveness and Regional Integration project	EU	Office for Africa (OA), MAR, TFPB, EC, TISI ⁸⁴	Dialogue and Transparency, Trading process

⁸³ ITC, DFID Project Completion Report_final draft_11Jan17, p.40

⁸⁴ ITC's Trade and Investment Support Institutions section

Project name	Funder	Implementation team	Areas of intervention
Tunisia negotiation consultation*	NTM	MAR	Negotiation
Morocco training workshop*	NTM	UNESCWA	Negotiation

* Activities took place according to the programme management; nevertheless the information obtained by the evaluation team is not sufficient for triangulation and substantive analysis.

198. These projects have mostly concentrated on the areas of quality as well as dialogue and transparency. Concerning quality issues, this can be partly explained by the fact that they are often the main obstacles identified in NTM surveys, reflecting in particular the need for the enterprises for meeting technical regulations and demonstrating compliance. When analyzing the results chain, we can observe that these initiatives have been built on the learnings generated through the NTM survey. In some cases, the initiative followed a very precise recommendation as in the case of Jamaica where the report recommended Jamaica exporters to implement the HACCP quality management system. In most of the cases, the survey recommendations were targeting at broader issues and the main instruments used by the projects were not directly derived from it. This is the case of the project to improve the safety and quality of the Sri Lanka fruits & Vegetables, where while the NTM survey identified quality related regulations and their conformity assessment being most burdensome for enterprises, the establishment of a pest risk analysis team in the Plant Quarantine Office; necessitated instead a FAO survey more specialized in the quality area.
199. Although the linkage with NTM survey results less evident, the emphasis on transparency is also logical since the promotion of dialogue between the business sector and government is imbedded in any approach to address NTM-related barriers and since it is the impact area for which the NTM Programme itself has developed the TOAM tool.
200. Projects developed in the area of trading processes have often involved the support of bilateral and multilateral agencies, including the EU, USAID, UNCTAD etc. These have successfully attracted more resources and developed into full-fledged projects, usually addressing various follow up areas with a larger scope and have required the joint implementation of the NTM programme with other ITC teams, such as the USAID-funded Arab States project and EU-funded UEMOA project. In the case of the Arab states project, UNCTAD, the World Customs Organization (WCO) and UNESCWA were consulted by ITC to coordinate the interventions in the areas of customs procedure and rules of origin, to ensure the complementarity of the activities and added value of the respective projects. While the Bangladesh project is the only project dedicated to address procedural obstacles among the follow up initiatives funded by the NTM Programme, it successfully adopted the UNCTAD methodology, the eRegulations portal,⁸⁵ to document trade procedures.
201. On the other hand, trade negotiations, which is clearly identified by stakeholders as the means to address obstacles, originated from foreign countries, which make up the main part of obstacles faced by exporters, has only been limited in terms of actions undertaken under follow up. The programme management reported only two activities related to negotiations funded in Tunisia and Morocco, respectively for a training workshop and a staff travel to participate in consultation for trade negotiations, which seems to represent a more restricted scope comparing to other projects developed.
202. Considering the partnerships inside ITC that have been used for designing and implementing these follow up activities, they appear somehow more limited than originally planned. Many of these collaborations have not lead to further concrete projects with interventions to address NTM-related obstacles. Many activities have been limited at the input level, consisting mostly

⁸⁵ The eRegulations portal is pre-developed by the UNCTAD and has been used in 30 countries to publish regulations and procedures for investment, trade or business facilitation purposes. It presents procedures step-by-step to the users; For instance to obtain a phytosanitary permit, the portal will indicate the required documents, the related government agencies to visit, the expected duration and cost to obtain the permit, as well as all legal justification of the procedures.

in the funding of staff missions to hold consultations or participate in programme stakeholder workshops or conduct needs assessment to identify follow up activities. In some cases, the collaboration has been providing more value with for example, the drafting of a proposal for possible follow up activities, such as with Office for Asia and the Pacific (OAP) in preparing concept notes for Bangladesh and Nepal.

203. Moreover, some ITC sections have not been included in the scope of collaboration, despite their operations being closely related to addressing NTM-related obstacles. The striking case is the Trade Facilitation and Policy for Business (TFPB) section which in the impact area of trade processes, provides tailored advisory services for policy makers to assess their compliance to Trade Facilitation Agreement, as well as scheduling necessary reform and also supports establishing the national trade facilitation committees, a domestic coordination and consultation mechanism requested by the TFA. The same applies to the impact area of trade negotiations, where the section provides advisory services, Public Private Dialogues and training workshop for policy makers to form negotiation positions and for TISIs to build an advocacy strategy.
204. In the cases where follow up activities generated additional resources to the NTM Programme, they were either used to develop new products or to scale up and improve the existing ones. This is particularly the case for the TOAM mechanism which development was funded with EU/ PACIR programme resource, the Euro-med platform established with EU funding, and the Guide on Customs procedures with USAID resource. EU and USAID projects were used to expand the number of countries covered by NTM database, to improve database in terms of data entry methods, and to set up a regional TOAM in UEMOA. While in the ToC and in phase 2 plans, the follow up activities were supposed to address the obstacles identified in countries through previously conducted survey processes, in reality, the additional resources attracted also helped to expand the programme activities in new countries.

3.2.9. Positive Contribution to Identifying Gender Specific Trade Obstacles

205. The gender-disaggregated data collected in the survey also provides opportunities to analyse NTMs from a gender perspective. In this regard, the Programme has cooperated with the Women and Trade Programme by publishing 12 internal short country documents, which focus on the representation of women among the workforce of exporting companies and in the management of exporting companies.
206. Using the gender-related data gathered by the programme, several ITC studies put in efforts to identify obstacles faced particularly by women businesses. These studies found that female-owned enterprises often face a higher rate of procedural obstacles especially due to information and transparency issues, informal or high payments, and discriminatory behaviour, occurring when female entrepreneurs interact with customs officials or clients in person.⁸⁶ However, these further analyses were conducted mainly by the Women and Trade Programme⁸⁷ and the Chief Economist and Export Strategy (CEES) section⁸⁸; although the programme contributed substantially through the internal country documents produced and consultations with other ITC teams, the use of gender-related data by the programme appeared to be limited.
207. In terms of solutions to mitigate gender specific trade obstacles, some potential solutions were drawn, for example through single windows and electronic procedures to reduce the need of women entrepreneurs to trade through face-to-face interactions.⁸⁹ However, to formulate further concrete solutions, a need to gather more detailed and contextual data is expressed, as gender-related data currently is only collected through structured questions in

⁸⁶ ITC, SME Competitiveness Outlook 2016, <http://www.intracen.org/uploadedFiles/SMECO2016.pdf>, p. 50

⁸⁷ ITC, 2015, Unlocking Markets for Women to Trade, http://www.intracen.org/uploadedFiles/intracenorg/Content/Publications/women_in_trade_web.pdf

⁸⁸ ITC SME Competitiveness Outlook series

⁸⁹ ITC, SME Competitiveness Outlook 2016, <http://www.intracen.org/uploadedFiles/SMECO2016.pdf>, p. 50

phone interview stage, and it is not sufficient to understand the exact difficulties faced by women entrepreneurs.

3.3. Efficiency

3.3.1. Use of Resources to Achieve Deliverables and Objectives

208. **The Programme was able to generate sufficient interest in its context to mobilize important financial support from other donors, all the more for its phase 2, which was more forward looking and action driven.**
209. The NTM Programme has been successful in mobilizing financial support to enable the development of the NTM Programme infrastructure. DFID has been the NTM Programme core funder. DFID has confirmed its commitment with an increase of the funds from GBP 1.65 million (around USD 2.6 million) in phase 1 to GBP 2.69 million (around USD 4.3 million) in phase 2. The NTM programme has leveraged these core resources to raise additional funds with a variety of other donors and ITC corporate resources. DFID resources represented 86 per cent of total resources during phase 1 against 46 per cent in phase 2. As a result, the overall disposable funds have grown three times from USD 3 million in Phase 1 to USD 9.48 million in Phase 2.
210. In Phase 1 (January 2010 to March 2013), DFID support was aimed at collecting and disseminating official NTM regulations issued by 45 countries, and developing a web application that disseminates the official NTM data (component 1). In addition, this funding was also aimed to support conducting 23 NTM surveys, including 20 awareness-raising workshops in survey countries (component 2). Funding mobilized through other donors (see table 8 below) was devoted to expand the network of countries benefiting from NTM surveys to five additional countries (Egypt, Morocco, Palestine, Tanzania, and Tunisia) and to develop and operationalize the TOAM in Côte d'Ivoire, which was to become a crucial tool in follow up activities in phase 2 (component 3).

Table 8: Phase 1 funding detail

Source of funding	Amount (USD)	Usage of the fund
DFID	2,600,000 (1,650,000 GBP)	NTM data and database development
		Survey
One UN (Project: UR Tanzania- Integration of Horticulture Supply/Value Chains into Tourism, UNDAP)	90,000	Survey in Tanzania
UNDP (Project: State of Palestine- Strengthening Capacities in Trade Promotion for Export Development)	90,000	Survey in Palestine
EU (Project: Côte d'Ivoire- Institutional strengthening of economic policy and facilitation of regional and global integration, PACIR)	100,000	TOAM Côte d'Ivoire
Canada (Project: Enhancing Arab capacity for trade, EnACT)	130,000	Survey in Egypt, Morocco, Tunisia
ITC Regular Budget	39,150	Additional staff costs
Total funding	3,049,150	

211. In Phase 2 (September 2013 to December 2016), the NTM Programme was in a position to build on the Programme Plan developed earlier in May 2013, which further supported the development related to NTM data dissemination (component 1) and NTM survey (component 2), and expanded the activities into two additional components: initiatives to mitigate NTM-related trade obstacles (component 3), and services trade regulations (component 4).⁹⁰
212. The NTM Programme used DFID seed funding, to pull resources from multiple other donors to expand the scope and improve the coverage of the three first components mentioned above: The EU DG Trade for example, funded the programme to conduct a tailor-made survey in 28 EU countries; the Arab States Aid for Trade initiative project funded by ITFC and various other donors also included surveys in Jordan, Sudan and Saudi Arabia. Three projects enabling follow up actions was implemented under the support of USAID, EU and Turkey. NTM data was further collected for 15 countries with the resources provided by the Transparency in Trade

⁹⁰ Details refer to Chapter 1.3 on programme theory of change.

Initiative,⁹¹ EU, Turkey and USAID; the web application was also refined in terms of data collection methods under the USAID project.

Table 9: Phase 2 funding detail

Source of funding	Amount (USD)	Usage of the fund
DFID	4,300,000 (2,690,000 GBP)	NTM data
		Survey
		Follow up initiatives
EU DG TRADE	2,948,095	Survey in EU 28 countries
		TOAM Zambia
		Euro-Med Trade and Investment Facilitation Mechanism (TIFM), including NTM data for 8 countries (Algeria, Egypt, Israel, Jordan, Lebanon, Morocco, Palestine, Tunisia)
Turkey	200,000	Euro-Med Trade and Investment Facilitation Mechanism (TIFM) , including NTM data for Turkey
USAID (Project: Arab States- Coordinating a regional approach to overcoming trade obstacles related to NTMs)	440,000	NTM data for 5 countries (Morocco, Algeria, Tunisia, Egypt and Jordan)
		NTM database beta version development
		Guide on Customs Procedures for Jordan
Islamic Trade Finance Corporation (ITFC) and various donors (Project: Arab States-Aid for Trade initiative)	435,000	Survey in Jordan, Sudan, Saudi Arabia
Transparency in Trade (TNT) Initiative	21,667	NTM data for Antigua and Barbuda, India, Pakistan, Qatar, Saudi Arabia and Sri Lanka (2 were updated and 4 were collected)
ITC Window I funds	141,500	Services
ITC Regular Budget	992,430	NTM database hosting (under Macmap)
		TOAM database hosting
		Additional staff costs
Total funds	9,478,692	

213. **With the financial contribution by its main donor, the Programme efficiently reached and even surpassed some of the pre-set targets presented in the MoU signed with the donors. Overall, the NTM Programme’s products have been delivered in a cost-effective way. However, some reports have not been fully finalized, and there are shortcomings concerning other targets because of lack of funding.**

⁹¹ Transparency in Trade (TNT) initiative is a multi-year program jointly launched by ITC, UNCTAD and the World Bank, in consultation with the WTO and the United Nations Statistics Division (UNSD) from 2014. The program aims to remedy some of the major gaps in data collection including data on tariffs, non-tariff measures, contingent protection, and trade flows, to improve dissemination, and to place the financing of the associated databases and analytical tools on a firmer foundation.

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214. **The Programme has enabled the constitution in ITC of a skilful team combining multidimensional expertise in non-tariff measures, training of partners on survey and interview, and competencies for data quality control and report drafting.**
215. As a result, in terms of these first three components, the NTM Programme has mostly exceeded its performance targets as set in the two successive DFID MoUs:
- a. Concerning the NTM Database, 90 country data were collected (36 directly by the ITC) against targeted 60 in DFID MoU.
 - b. In terms of the NTM survey: achieved 39 survey analyses against targeted 38 (with additional 28 countries funded by EU); 40 stakeholder workshops against targeted 38 (with additional 3 workshops funded by other donors).
 - c. Follow up initiatives: drew up initiatives/ actions for 16 countries against targeted 15.
216. Concerning services trade regulation, which is the fourth component, it is important to note that no specific funding was assigned in the second DFID MoU, although performance indicators were set. The implicit idea was that this pilot activity would be developed with the support of Window I funds (ITC corporate non-earmarked funds). The 2013 Programme Plan estimated that USD 2 million were necessary to fully implement the fourth component. However, the only funding that was assigned to it was USD 141,500 ITC Window I funds in 2016, leaving the component with about 7% of the planned resources on the last year of Phase 2. Unsurprisingly, objectives could not be met at the end of Phase 2. The NTM Programme has managed this situation with flexibility and has nevertheless achieved important results: although it has not been in the position to develop a final taxonomy (jointly with WTO and other related organizations), it has developed a draft taxonomy that has been used to develop survey questionnaires for three different service sectors, which have been tested in one country.
217. In terms of the human resources developed through the NTM Programme, the evaluation observed that external stakeholders and ITC colleagues overall consider the NTM team as skilful, both in terms technical and management skills. It is worth to note that the management of such a programme requires a set of multidimensional expertise combining technical knowledge on non-tariff measures, skills to conduct trainings on survey and interview, and competencies for data quality control and report drafting. Managers are responsible for all the steps in a surveyed country, from inception to final report. Using data collected during the evaluation, it was estimated that to nurture and develop a manager possessing the above capacities, it requires a four-year experience from data collection, to survey implementation, and finally to survey management.
218. The NTM Programme team was originally established during the pilot phase and did evolve to nine members at the end of Phase 1. At the end of Phase 1, it faced a funding gap that took place during the transition from Phase 1 to Phase 2 (March to September 2013) incurring the risk of losing staff essential for its sustainability. It is precisely the constant investment in developing human resources skills that enabled the Programme to overcome this situation. The cross-cutting skills of the NTM team and the flexibility of having it easily assigned to other Market analysis and research (MAR) activities enabled the NTM Programme to retain its staff. Finally, the risk was mitigated and the NTM Programme team was able to maintain a size of ten members in Phase 2, with a few position supported by ITC Regular Budget.
219. Considering similar services available in the TRTA market, the evaluation estimates that NTM Programme products enjoy a competitive advantage with comparatively lower costs. Anecdotal evidence provided by the NTM Programme and confirmed by direct observation in the field, indicates that this is particularly the case of the country survey products for which the average data collection cost for NTM survey has been kept around the modest sum of USD 45,000 per country (not including ITC staff's time), while efforts have constantly been devoted to improve efficiency of production processes. This has been the case of the NTM survey, which improved its data collection processes by expanding the technical selection criteria of companies soon after the first year of Phase 1. In Phase 2, NTM Programme also invested in developing the e-learning and other training tools, which increased the efficiency of physical

training and quality of data collection. Similarly, thematic roundtables have been introduced to allow for more focused discussions in stakeholder workshop.

220. Processes have also been improved in the case for the NTM data collection methods that were also refined using the USAID project resources. A beta version of the web application was developed so that consultants collecting data at country level can continuously and directly conduct data entry into the database, instead of having to send a whole set of country data. According to Programme management, this innovation is expected to improve the frequency and accuracy of NTM data collection.
221. At the same time, several discrepancies have been spotted by stakeholders or by the programme team in terms of lacking the resources to deliver key products or activities which importance is being pointed out in the NTM Programme ToC. This refers in particular to the lack of resources for the publication of National Survey Reports, cost-wise but more importantly timewise. Although these were foreseen in the 2013 Programme Plan, their production was not included in any of the MOUs signed with DFID, but instead supported by MAR buffer fund⁹² and published after programme implementation phases. As a result, while stakeholders have unanimously considered this output as the critical deliverable of the NTM Programme, its timely delivery has been falling short: only 60% of the survey's data was published in a report during phase 1 and 2 (see Table 10 below).

Table 10: Comparison between survey conducted and published

Indicator(s)	Phase 1	Between Phase 1 and 2	Phase 2	Total in Phases 1 and 2
Number of countries where the non-tariff measures (NTM) survey is finalized and survey data is analysed	18 (23 counting in non-DFID funded surveys)	0	16 (44 counting in non-DFID funded surveys and EU 28 countries)	34 (67 counting in non-DFID funded surveys)
Number of countries where the analysed NTM data is published in a report	4 (5 counting in non-DFID funded surveys)	2	14 (46 counting in non-DFID funded surveys and EU 28 countries)	20 (51 counting in non-DFID funded surveys and EU 28 countries)

222. The second discrepancy lies in the lack of resources planned for NTM survey related analyses and research products, for their dissemination and communication. The NTM programme has developed a website⁹³ presenting NTM Business Surveys and other publications related to NTMs which cost has not been included in the NTM Programme budget. In addition, despite some comparison between country results is available at a quite aggregated level on this website, the NTM Programme team indicated that because of lack of funding for cross country research it cannot meet demand for more detailed analyses, related for example to SPS-TBT-related obstacles and gender-related analysis. Moreover, as already mentioned, the evaluation has identified that stakeholders were not necessarily aware of the different products and services provided by the NTM Programme: this demonstrated a lack of resources for communication purposes.

⁹² As explained by programme management the buffer fund includes income generated from licensing, user payment for tools, revolving fund etc.

⁹³ NTM Business Surveys website: <http://ntmsurvey.intracen.org/home/>

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223. Concerning the monitoring of results, the NTM Programme has focused on the indicators reported to DFID logframe, which are of limited scope comparing to those indicators listed in the 2013 NTM Programme Plan. In terms of the outcome level, results have not always been systematically monitored. This is in particular the case for the indicator on the “Number of implemented policy decisions to removed identified non-tariff barriers to trade”, which measures impact. The NTM Programme team reported difficulties and lack of resources on monitoring policy changes in survey countries after the survey process ended in the country, leaving the NTM Programme monitoring to rely on anecdotal evidence. On the contrary, the monitoring of results at the output level is relatively complete.
224. The financial management environment has also been somehow challenging: On the one hand, Programme spending is being only recorded by inputs, line items and were not results-based and aggregated costs at output level were not available. The main explanation is that ITC corporate project portal also did not allow budgeting and financial reporting by output, before its renovation in 2015 and that Donor reporting did not request spending details. On the other hand, difficulties were encountered when ITC converted to the new UN wide administration Umoja system in late 2015. Account transferring from ITC’s old system to Umoja created confusion and did not allow the programme to keep track of the payment. With the running-in of Umoja completed, in the future, financial data should be organized by outcome/ component; staff costs, event costs, administrative costs, publication costs, to name a few. For the present evaluation, financial data was clearly insufficient to conduct the needed efficiency analysis.
225. Overall, while it seems that ITC management objective was to cover as many countries as possible with the Programme, there was a lack of funds to make sure that the actions related to the data generated by the Programme would actually be implemented into solutions owned by partners and beneficiaries. Moreover, the funds allocated to the implementation of intermediate outcome 2 targets (enhanced capacity of decision-makers to take actions to overcome NTM barriers) were not managed efficiently as Programme management lacked the capability, understanding and authority to coordinate with other ITC Sections. This efficiency issue affected the Programme’s ability to ensure more sustainability for the results reached in each country.

3.4. Sustainability

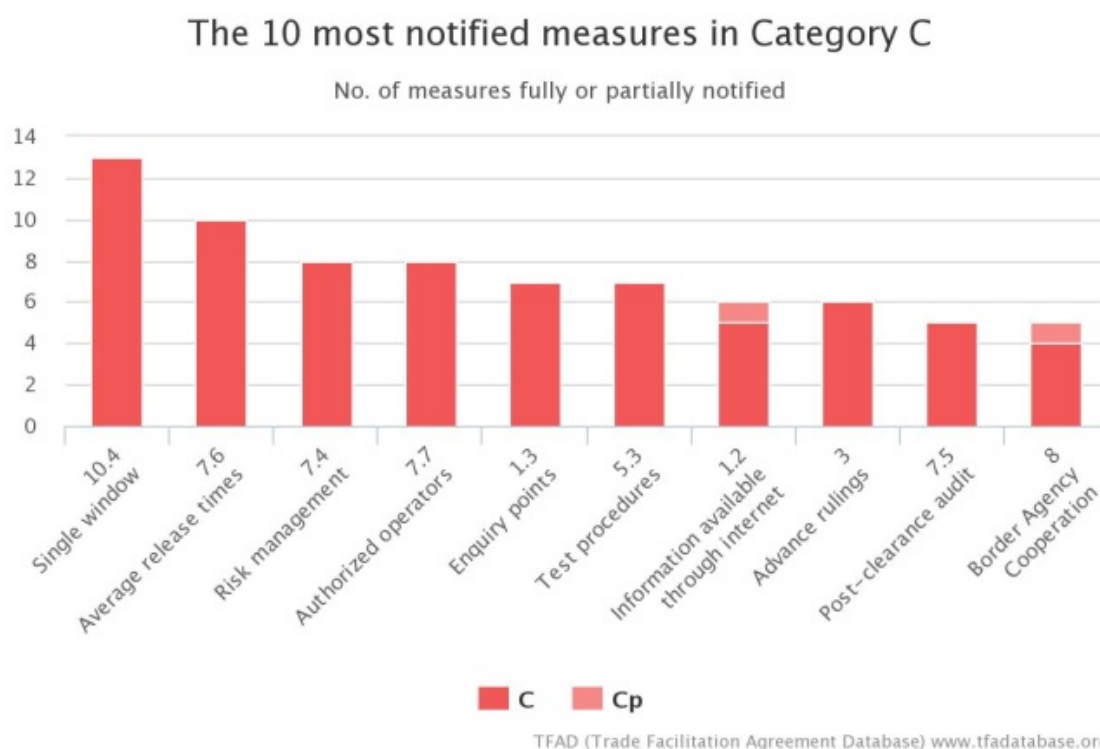
3.4.1. Stakeholder Ownership

226. **For many of the beneficiaries—all the more from the private sector, who were mostly only involved through the survey, but also from the public sector—the lack of ownership over the Programme’s results have led to less than expected sustainability prospects for the achieved results. Such is also the case for the survey service providers whose newly acquired know-how seems to have little chances of being reused if there is no follow-up demand for these types of services. However, many of the public sector representatives, mainly the policy makers, did have some ownership over the Programme. Circumstantial elements such as the WTO TFA help increase the buy-in from these stakeholders.**
227. An important condition for an ideal client profile is the level of commitment. Evidences collected by evaluation consistently show that strong political commitment is essential for the Programme’s success in triggering change; on the contrary, lack of commitment results in difficulties in the implementation process, negatively affects all stakeholder’s involvement and hinder the buy-in process to take place. In certain circumstances, the commitment could be observed through multiple channels, for example, the country’s clear demand and willingness to use the Programme products, precise national strategy for integrating in the global value chains, rectifying the Trade Facilitation Agreement, etc. However overall, no trend of strong political commitment has been noticed by the evaluation team.
228. Nonetheless, as direct beneficiaries, policy makers have demonstrated a capacity to use the benefits provided by the NTM Programme into further improvements of their own capacity to

address NTMs and of the conditions within their own environment. However, sustainability aspects are mixed for non-direct beneficiaries as the ownership developed over the NTM Programme activities has been relatively limited in most of the cases.

229. Among Policy Makers, Ministries of Commerce are certainly the category of stakeholders that has been the most able to build good ownership over NTM-related issues. The increased awareness and knowledge of Ministries of Commerce about NTMs and the NTMs classification have continued through time, and have been used in trade negotiations. Ministries of Commerce need to develop this expertise further and would like to access similar surveys for other countries and for services. From a domestic perspective, Ministries of Commerce are interested in seeing the survey being repeated now to allow the monitoring of the changes made, in the context of its need to monitor the implementation of national commitments in the context of the WTO Trade Facilitation Agreement (TFA).
230. The TFA has introduced a legal obligation to ensure that transparency and dialogue objectives of the NTM Programme are further developed. These obligations are related to the publication of trading procedures through internet, regular consultation with traders and stakeholders and opportunities to comment on regulations before they entry into force, as well as border agency cooperation, such as in aligning the procedures and formalities. The TFA also requires the creation of an institutional instrument to coordinate the different responsible agencies and to monitor progress.⁹⁴ These needs are going to last for the years ahead as reflected by the requests for technical assistance introduced by 14 member states as of June 2017, within special and differential treatment for LDCs and developing country provisions of the TFA. As the Graph below indicates, member states needs are related to ITC's technical assistance offers such as the development of software and legislative framework to publish information online, to enhance border agency cooperation and to establish enquiry points to answer questions from traders, governments and other stakeholders. The graph below demonstrates what are the 10 most notified TFA measures on which countries notified a need for additional time and capacity building support to implement.

Graph 7: Most notified TFA measures requiring technical assistance (as of June 2017)



⁹⁴ This is the National Committee on Trade Facilitation (Article 23, *ibid*)

231. TISIs' ownership over programme results is also limited. No TISIS has tailored business support services for their network of enterprises as a result, or in conjunction with, NTM Survey activities. TOAM can be viewed as an exception where the mechanism was integrated by the TISIs as part of their service. In both Côte d'Ivoire and Mauritius, the Chambers of Commerce has invested sufficient human resources to administer the TOAM. Nevertheless, in both countries there were needs for continuing ITC support. The highlighted areas were communication to promote the use of TOAM among companies, and the operation costs in transportation, telephone, internet connection etc. The maintenance of the platform and storage of data were also considered financially challenging for the TISIs.
232. Concerning enterprises, although they are considered as the final beneficiaries expected to use the NTM information to generate business, through better compliance with regulations and procedures, the evaluation has not been in a position to gather evidence that they have developed ownership over the NTM Programme activities and results. Besides being interviewed, their interests were not addressed by the Programme's activities per se, neither directly nor through TISIs. Some enterprises participated in the stakeholder workshops and those who provided their email would, two years later, receive a link of the final reports. The only evidence that the evaluation identified has been of a company follow-up action that took place in Mauritius through an ad hoc dialogue channel established after the stakeholder workshop. Contrary to the NTM survey, TOAM was fully designed to address enterprises direct needs and provide them with the opportunity for direct involvement, but as mentioned earlier, its benefit also drops, as companies have reduced the use of TOAM to communicate trade obstacles. Finally, in terms of the NTM database the evaluation was not in a position to triangulate convincing evidence that enterprises use it. The monitoring system within the Market Access Map does not track users by type. The evidence collected by evaluation did neither reveal that companies knew about it.⁹⁵
233. In terms of local knowledge networks that have been supported by the NTM Programme, in a few cases academic institutions were involved in NTM survey implementation and were also trained in NTM classification. The evaluation gathered indications that this experience has contributed to empower them to carry out NTM related analysis and NTM related research work in the future. Nevertheless, the number of these institutions involved has been fairly limited and only limited to participating in NTM Survey component⁹⁶ while the NTM Programme has not established a knowledge community in other interventions.
234. In the absence of creating an analytical capacity and knowledge network, the NTM survey has been remaining a punctual exercise with little continuity or follow up. It was indicated in several countries there was an interest to replicate the survey over time, but the demand has not been met by local stakeholders' involvement. A survey was repeated in Sri Lanka in 2016 on a smaller scale; this survey was, however, also conducted by the NTM Programme.

3.4.2. Exit strategy

235. **One of the most important cause of the lack of foreseen sustainability of the results achieved through the Programme is the lack of strategic planning at its design phase which would have taken into account the needs and functions of the different categories of beneficiaries that could have acted as multipliers and implementing partners (mainly policy makers and TISIs). The Programme entered into implementation with outputs as objectives—trained survey service providers, surveys conducted, reports developed and workshops organized. Initially, there was neither a longer term perspective of what these outputs were supposed to accomplish from the implementing partners' perspective, nor an exit strategy defining mutual expectations discussed and agreed upon. With a few exceptions, the Programme did not include in its approach the support**

⁹⁵ It is also worth to mention that a few follow up projects that are related to quality issues have had direct interaction with companies. However, the analysis of these projects' sustainability effects are out of the evaluation scope, and remain to be verified, as they concluded only recently in 2016.

⁹⁶ There were four academia and research institutions implemented the survey, which were University of Rosario in Colombia, BNETD in Côte d'Ivoire, Kathmandu University School of Management in Nepal, and University of Seychelles.

to local knowledge networks. As noted above, the ToC was retrospectively developed, including during the evaluation process.

236. **TOAM is a relatively sustainable tool that is designed to operate outside of ITC intervention. Nevertheless, sustainability prospects are somehow limited by the decreasing level of use.**
237. Supporting sustainability, presupposes the capacity to communicate with beneficiaries and stakeholders about what are the development expectations for the NTM Programme intervention and an agreement in terms of mutual commitments binding the partners. This vision has been incrementally built throughout the period under evaluation, progressively evolving from a research-focused / donor-driven to a development-focused / beneficiary-driven approach. The successive steps were the introduction in the 2013 Programme Plan of a form of exit strategy focused on enhancing sustainability at the country level with initiatives to follow up on the NTM Survey recommendations. The successive 2013 MoU with DFID completed this with the formal inclusion of follow up actions as one element in the programme to ensure that local stakeholders would be empowered to analyze and treat NTM-related barriers in a sustainable manner. This process of maturation has been further completed in 2016 with the formalization of the NTM Programme ToC, which integrates all components under a single client-focused logic.
238. When analyzing the initiatives undertaken to address NTM-related obstacles (as part of a component 3 of phase 2) they have mainly consisted in new projects carried out by the ITC and supported external donors. Most of initiatives were a one-time intervention conducted by ITC, such as trainings and stakeholder workshops held under the Sri Lanka, Senegal, Jamaica and USAID projects. Moreover, despite some government stakeholders have been expressing the desire for an NTM survey follow up to assess progress over time, none of them has actually mobilized the necessary resources to undertake a similar initiative after the NTM Programme activities have ended. On the contrary, TOAM is a relatively sustainable tool that is designed to operate outside of ITC intervention. Nevertheless, as explained earlier, sustainability prospects are somehow limited by the decreasing level of use.⁹⁷
239. To fully analyze the issue of sustainability, it is necessary also to take into account that survey recommendations are only one part of the whole NTM Programme interventions. To be effective, stakeholders' capacity and ownership need to be built not only at the end of the intervention cycle but also at each of the rings of the intervention chain. The NTM Programme has favoured product-oriented commercial relationships with services providers (private sector companies specialized in conducting surveys and individual consultants) over development-oriented capacity building, as exemplified by the emphasis of technical capacity to implement the survey in its selection criteria for partners. This approach has been very effective in ensuring the quality of deliverables (mainly the data generated through the surveys), but is short in terms of sustainability. The quite sophisticated NTM knowledge generated by the NTM Programme is somehow lost; as companies specialized in commercial surveys, if not previously involve in trade development issues, do not conduct further work in the this field after the assignment with the ITC. Meanwhile, academia and research institutions have better chance to continue working on NTM related issues. For example, BNETD, the research institution conducted the survey in Côte d'Ivoire, participated later in several NTM related work in the ECOWAS countries; in Colombia, the University of Rosario was commissioned by the Corporación Andina de Fomento (CAF) for another assignment to assess NTMs in the Pacific Alliance. However, there was limited number of research institutions involved in survey implementation. It is not clear how the programme planned to continue the different components after the intervention, neither how the stakeholders intended to extend the benefits derived from the programme.
240. The NTM data, disseminated through the Market Access Map, is of concern for sustainability. Positioned as a global public good, its sustainability fully depends on ITC, both technically and

⁹⁷ For other transparency platform, there is also potential for the Bangladesh government to take over the *Transparency in Trade Procedures* portal, although it is still under construction at the time of the evaluation. On the other hand, the Euro-Med Trade and Investment Facilitation Mechanism (TIFM) platform is linked to the Market Access Map and other ITC databases; the sustainability aspect is thus similar to the NTM database, which is discussed below.

financially. Technically, local ownership is mostly disabled as stakeholders were rarely involved in data collection and processing, rather they were mostly done through ITC-based consultants, although improvement has been considered in recent USAID and EU projects.⁹⁸ Nevertheless, ITC's role in quality check and data dissemination will always remain indispensable. In addition, the data is collected upon soft partnership commitments between ITC, UNCTAD and World Bank, without a regular longer-term plan for data collection and update. Financially, ITC funding sources for data collection have been dispersed in several extra budgetary resources,⁹⁹ instead of a stable and regular funding. Nonetheless, a database with the nature of global public good would require a comprehensive coverage in terms of country and over time. It is questionable whether it can be achieved under the current operational model and resource arrangement.

3.5. Impact

241. **The lack of strategic planning coupled with the initial focus on outputs led to a situation where the Programme's contribution to impact level results have not materialized. In a limited number of occasions, some stakeholders did develop concrete ownership over some tools built through the Programme. Perspective for some impact has been noted, mainly through public-private sector transparency and dialogue mechanisms. Knowledge and awareness enhancement for public stakeholders and international community is observed.**
242. In assessing the issue of impact, it is important to take into account that the programme has matured its high-level objectives throughout the period under evaluation (2010-2016). During phase 1 (2010-2013) it was in principle only focused on raising awareness and knowledge of stakeholders and beneficiaries on NTMs, not on supporting them to mitigate barriers related to NTMs. Therefore, the evaluation is more interested in generating learning that is useful to the Programme management rather than assessing accountability.
243. Through the deployment of the NTM survey and report, the programme has successfully enabled stakeholders to gain awareness of the importance of NTMs and it has brought to understanding the importance of NTMs in affecting production, post-production and trading activities for specific sectors and products. This has been the case of the Ministries of Trade, which have clearly gained knowledge of the NTMs and of the linkages between NTMs and enterprise competitiveness, in particular at the beginning of the Programme when NTMs were a new and little-known topic. Decisive improvement of NTM knowledge has also been the case for the institutions involved in implementing the survey and drafting the report, such as the Bureau National d'Etudes Techniques et de Développement (BNEDT) in Côte d'Ivoire. Although this relates to the very few cases where these tasks were not assigned to private contractors. In broad terms, policy makers have been continuously interested in obtaining data generated by the Programme and in coming together to better understand it.
244. Despite the accuracy and usefulness of data collected and analysed by the Programme, the interest of TISIs in the Programme has been quite limited since their role has not been taken into account in the overall Programme approach: TISIs involved in NTM survey and report activities, were neither supported to develop and articulate their lobby role to defend SMEs' NTM-related interests with national institutions, nor were they supported to develop their services to SMEs in meeting NTM-related market requirements and procedures.
245. Concerning SMEs, the evaluation has not been in a position to observe that services provided by the Programme have enabled them to directly have access to information on NTM and develop an awareness of the related challenges with good understanding of market requirements and related procedures. In the overall, it is true to say that the information generated by the Programme has not been adapted to their needs and capacity and that in

⁹⁸ In the EU funded TIFM project, it is planned that national focal points in 9 Mediterranean countries (Algeria, Egypt, Israel, Jordan, Lebanon, Morocco, Palestine, Tunisia, Turkey) will voluntarily provide data for ITC to update. Under the USAID project, a beta version of the web application was developed so that data can be collected, classified and coded directly by local market analysts.

⁹⁹ Including DFID-NTM programme funding and project resources from EU, USAID and Transparency in Trade initiative.

many instances, it has not even reached them. Contrary to what was expected in the ToC, stakeholders have not been in a position to systematically generate and design coordinated solutions to mitigate NTM related obstacles identified by the Programme. Despite the increasing efforts deployed by the Programme to better prepare and better follow up on the stakeholders' workshops, the format of this output has been too light to ensure policy makers' ownership over the survey results presented and discussed. However high the quality of the Programme outputs might have been, the causes to NTM-related obstacles are so multiple and the coordinated intervention of several institutions requires a much more in-depth mechanism, which seems beyond the Programme's possible scope.

246. As a matter of fact, impact has been only observable when the Ministry of Commerce has been taking ownership over the survey results discussed at the stakeholders meeting to further design coordinated solutions between stakeholders. At the beginning of phase 1, as a result of the very first NTM survey conducted by the Programme, the Sri Lanka Department of Commerce (DoC) followed up nationally on the basis of additional information provided organized in a matrix of obstacles per institution. DoC called a meeting among government agencies to follow up on the findings and discuss initiatives to address the obstacles identified. Through the action of DoC, the different agencies became aware of the need for coordination on NTM-related issues and the evaluation confirmed that some of the initiatives recommended in the report were implemented. Similarly, at the end of phase 2 in the Philippines, after the stakeholder workshop was held, the Philippines Export Development Council discussed the survey findings in the Networking Committee on Trade Policy and Procedures Simplification. A matrix of action assigning recommendations to different agencies was formed, based on the matrix of recommendations provided in the workshop material. In this action plan, the government of Philippines requested further assistance from ITC, but the majority of action would be implemented by the country itself.
247. In the above cases where the track of the programme is traceable, it happened when the Programme provided a matrix with obstacles and recommendations classified, which has not been systematically followed throughout the Programme. It is also important to note that in both cases the Ministry of Trade is the institution with the mandate and capacity to implement policy changes, to communicate policy objectives and form consensus with the private sector. Programme outputs at such were not sufficient but required the Ministry of Trade to meet with ITC after the stakeholder workshop, which appeared in both cases to enable country follow up on their own initiative.
248. In paving the way towards achieving the impact level results, the Programme has established, or has contributed to establish, public-private sector transparency and dialogue mechanisms, which have enabled policy makers to inform, dialogue, analyse and eventually, pave the way for reducing NTM-related obstacles at home country, particularly those related to procedural and institutional inefficiencies. In a quite limited number of instances though, the evaluation has observed that policy makers have used these systems to take remedy action to overcome regulatory and procedural trade obstacles.
249. In all the confirmed impact cases, the Programme provided enterprises with the opportunity to directly communicate the obstacles to the responsible public agencies, which reviewed the policies, reconsidered their effects on businesses and finally, revised the regulations or procedures concerned, although it is important to note at the same time, that these companies were simultaneously advocating for their business interests through multiple channels.
250. In only one case, the evaluation observed that such an impact was originated as a result of the Stakeholders Workshop undertaken within the context of the NTM Survey process. This is the case of the Mauritius rooibos tea import, when a tea blender company submitted a query to the Customs and the Ministry of Trade soon after the stakeholder workshop was held in Mauritius in 2013. Originally, the Customs requested clearance from the Tea Board for importing rooibos tea; this measure was cancelled after the query and Customs reconsideration of the need for this procedure.
251. All the other cases are related to the implementation of TOAM, which took place in only two countries. For example, in 2016, an exporter reported on the Mauritius TOAM platform that a

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scrap metal export ban was enforced by the Cabinet of Ministers. According to the exporter, this ban would influence 250 direct positions and up to 3000 indirect jobs including collectors, lorry operators and traders. After this concern was raised, the Cabinet reassessed the effect of the ban and decided to allow companies who import raw metal to export the metal waste and by-products.

252. Logically, most of the cases have been related to procedural obstacles rather than to regulation change since the latter requires a much more complex and sustained decision-making process to deliver the required solution. In these cases of resolved procedural obstacles, regulations were incorrectly implemented or understood by national or foreign government agencies. In one case in Mauritius, the Customs requested an import permit that was no longer required due to an earlier change of law. In another case, the Veterinary Office of South Africa demanded the importer to present a permit that did not exist in Mauritius practice. Finally, in Côte d'Ivoire, the Customs requested a justification for a discrepancy that was not due to the company. Through the intervention of TOAM, these false requirements were clarified and cancelled.
253. Nonetheless, as demonstrated earlier in TOAM's effectiveness, the cases where TOAM resolved a real issue for the companies were rather limited. These cases accounted for only 29% among the cases solved through TOAM in Mauritius and Côte d'Ivoire. In other cases, the obstacles were considered resolved when the government provided justifications for the measures in question. Although it could be considered an improvement in information transparency and in informing complaining enterprises on specific regulations and procedures, such as customs clearance fee and time requirement, procedures to obtain certifications, clarification on the tax scheme, it did not change the situation faced by the companies. Moreover, after closely examining the obstacles considered resolved, it is noted that some were not necessarily helpful to the enterprises. For example in Mauritius, there were three cases related to delays in issuing export or import permits. While these permits are usually issued on a daily basis, it took one to four months for the TOAM to respond, by which time the permits were already delivered.
254. Concerning the effects of projects that were developed to address or mitigate the NTM-related obstacles identified by the Programme, an exhaustive analysis of indirect evidence of results that has been generated by projects resulting from the NTM Programme follow up activities is beyond the scope of this evaluation. However, observations suggest that these effects have been mainly concentrated in farmers having improved compliance to SPS standards. This is for example the case in Sri Lanka, where the STDF project trained 563 farmers on SPS issues such as Good Agricultural Practice (GAP), pests and diseases identification and post-harvest handling.
255. Finally, the Programme has played a proven useful role in supporting the international trading community in increasing knowledge and transparency on the importance of NTMs, including in the production of other stakeholders' analyses and knowledge product. For example, other actors, often TRTA providers, have used the survey data to inform their country strategic planning products. This was the case for the World Bank when updating the Diagnostic Trade Integration Study (DTIS) for Malawi in 2013. The WTO, on the other hand, also used the survey data in its World Trade Report 2012. These analyses were mostly informed by the survey data on the macro level, such as the rate of company influenced by NTMs, the most problematic NTMs in the country, and the source of NTMs, either from home or foreign countries. Some of these analyses also utilized the data produced by the Programme to inform relevant themes, in particular quality related NTMs and procedural obstacles. The main distinguished value was the presentation of quantitative data reflecting the private sector's point of view in an objective manner around a broad base topic.
256. In addition, other actors also integrated the report recommendations into their analyses. This was the case of the Cambodia National Silk Strategy conducted by ITC and Malawi National Export Strategy developed with the assistance of UNDP; in the latter case, the most problematic NTM identified in the country was later removed following the direction of National Export Strategy.

4. Conclusions

257. The Programme has been a very innovative in developing high quality tools and products. It has contributed to shape the analytical methods used by the multilateral trade community to understand NTMs from the business sector perspective and has also substantively contributed to broaden and enhance ITC human and technical skills.
258. Despite excellent achievements, under the present management architecture, the Programme does not gather the sufficient ITC resources to ensure stakeholders' engagement for carrying out impact. Addressing the negative effects of NTMs requires a multi-player engagement and multi-layered strategies, which design and management go beyond the capacity of a single ITC technical Section, whatever technically competent and operationally efficient it might be. As the Programme evolved from a pilot technical project into a full-fledged strategic Programme, it would have required an organically embedded coordination function to ensure the contribution of other ITC specialized services. These services include the support to ITC traditional stakeholders (governments, TISIs and enterprises), services specialized in technical fields necessary for follow up activities, such as quality and trade negotiations, and last but not least, those services focusing on country intelligence and country guidance.
259. More fundamentally, this evaluation raises the issue of ITC's savoir faire in managing the life cycle of a successful innovative donor-supported pilot technical project into a more strategic and integrated corporate solution, as this pilot technical project becomes more mature and with higher potential in terms of development impact
260. Another important point to be made is that the relevance of addressing NTMs through TRTA programmes cannot be questioned. As mentioned above, as tariff measures are decreasing NTMs on the other hand are increasing in number and complexity. Tackling their negative effects is fundamental to allow for SMEs in developing country to thrive and insert themselves in international markets and GVCs.
261. Beyond the legitimate concern for producing good quality technical outputs, it is necessary to address partners' and beneficiaries' development needs and priorities for the purpose of impact and sustainability.
262. In terms of adapting to context, Programme relevance would have benefited from Programme-embedded country guidance and intelligence from the Sections of the ITC Division for Country Programmes.
263. The Programme's relevance would have benefited from a more systematic and an organic cooperation from the ITC technical sections providing NTM-related services, and Programme-embedded country guidance and intelligence from the Sections of the ITC Division for Country Programmes.
264. Concerning the NTM Programme's effectiveness, , the Programme has been effective in contributing to shape NTM analytical methods, which are today commonly accepted and used in particular in the multilateral trade community. Beyond this notable achievement at the multilateral level, there are two main angles that can be used to assess effectiveness in the present evaluation: firstly, there is the accountability of the Programme managers towards the donors, i.e. the management's compliance with the contents of the MOUs signed between the ITC and DFID. On this basis, the evaluation considers that the work accomplished met the broadly requirements; this refers in particular to MOU 1 components 1 and 2 outputs. Secondly, although much work has been put into its implementation, with immense dedication, the fact remains that these efforts have not been organized around a coordinated approach towards more strategic objectives. This has hindered its potential for good higher-level results to materialize. What is more, the results that have been reached have limited chances of being sustained overtime. In terms of development, there is the longer-term vision related to the performance of the intervention strategy to support partners and beneficiaries to improve their own conditions and actions, as it is legitimate to expect of such a full-fledged programme; this refers in particular to shortcomings in achieving intermediary outcomes as identified in the theory of change. When agreeing on the MOU 2, the Theory of Change was not developed

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which would have pushed the Programme managers to think how outputs (immediate results) would have complemented each other to then achieve outcomes (intermediate results) and contribute to SMEs international competitiveness.

265. Another important reason why the Programme faced some difficulties in securing longer-term results was that it was *designed* with the intention to “execute”; in other words, to deliver outputs. During the design phase, the thinking revolved around how to get things done, which shows good management. However, this led to a situation where less strategic planning than needed was incorporated in the design phase but also during implementation. Lessons learned were integrated into how to better implement the same activities. Only slowly and somewhat late did the Programme evolve into a more structured setting.
266. The Programme executed what was planned through an effective approach: each activity was rigorously implemented, as in a research effort. Nevertheless, it seems that the objective was to cover as many countries as possible, without the needed in-depth considerations in each country to ensure that follow-up efforts lead to buy-in. There was not enough follow up by the Programme, with each of the stakeholders, to ensure they would continue working towards the overall objective of reducing the negative effects of NTMs *for the private sector and more specifically, the SMEs*. As mentioned above, one of the comparative advantages of the Programme was that it was designed with businesses in mind. Yet looking back, what did the businesses get out of this Programme? In the relevance section of the present evaluation report, a case story was presented: what has the Programme achieved that actually improve the situation of SMEs like these?
267. The decentralized implementing structure—e.g. conducting the surveys through the survey companies at the national level—had the positive effect of transferring knowledge to these partners. However, as much effort was put into these activities, it seems that this arm’s length approach between the ITC and other stakeholders—e.g. the TISIs and private sector representatives—did not foster interest for additional surveying exercises to be conducted or for actions to be taken on the basis of the data. This is also partly because not all stakeholders felt the outputs of the Programme were sufficiently tailored to their profiles and needs. Interactions between the different types of stakeholders were only minimal, except in the case of TOAM which main objective is to actually stimulate dialogue.
268. To summarise more systematically what is described above, here are the main evaluation findings by evaluation criterion:
269. **Relevance:** The concept at the basis of the Programme was overall relevant in the context where it was to be implemented and aligned with beneficiary needs. NTMs are at the centre of many public and private sector representatives concerns; the NTM Programme aimed at addressing these. Flexibility and adaptability is required to address different *types* of needs of different types of stakeholders and contexts. With the second MOU signed in 2013, the Programme evolved into supporting initiatives aimed at mitigating identified barriers and its different components and the way they were designed and implemented did not fully take into consideration this context and these different types of needs.
270. **Effectiveness:** Some interesting outputs have been delivered, including specific tools for the use of all stakeholders. However, at the intermediate outcome level, too little was accomplished and/ or followed-up on to generate a satisfactory level of results. The bulk of what has been achieved does not pave the way for stakeholders to take action and resolve NTM issues faced by the trading private sector.
271. **Efficiency:** The Programme has generally speaking met the requirements of the donors, although the monitoring system appears insufficient and prevents an in-depth analysis of the cost-efficiency of the programme. Addressing the negative effects of NTMs requires a multi-player engagement and multi-layered strategies, which design and management go beyond the capacity of a single ITC technical Section, whatever technically competent and operationally efficient it might be in delivering good quality outputs.

272. As the Programme evolves from a pilot technical project into a full-fledged strategic Programme, resource management requires the ability to adapt and change resource commitments as situations evolve and a management function with the capability, understanding and authority to maximize effectiveness and ensure sustainability towards (possibly evolving longer term) outcomes.
273. **Sustainability:** There was not sufficient overall logic linking all components and stakeholders of the Programme to allow for buy-in and ownership over the Programme. Although during implementation, the management team endeavoured to retroactively fill the gaps, the context in which coordinated work would have perpetuated the results achieved over time did not materialize.
274. **Impact:** Based on the findings from the other criteria, the chances of the Programme actually “enabling policy makers and other national and international stakeholders to take concrete actions to overcome regulatory and procedural trade obstacles that are a concern for small and medium-sized enterprises” are low. In this context, there is very limited evidence that the Programme has contributed to improving international competitiveness of SMEs in developing countries and transition economies in an inclusive and sustainable manner.
275. At this point—some time after the end of the Programme—the question of sustainability is the most important one. As the prospects for sustainability seem low, what can be done to counter this situation?

5. Lessons Learned

276. What are the next steps? Who are to take these next steps? It is difficult to envisage next steps when no real network of knowledgeable stakeholders has been put together by the Programme. It is important to empower the stakeholders to then hand them over the capacity to perpetuate the work initiated by the Programme. Empowering them means creating links between them. As an example, the countries where TOAM was deployed seem to have generated more links between the public and private sectors than in other countries.
277. Developing the reports by sector was an interesting and useful approach. However, the data collection as well as the reports themselves focused on the national level. To a certain extent, this hindered the potential for a more geographical approach (bi-national and tri-national as well as regional trade contexts). Trade occurs between countries. Had the Programme involved more than one country to discuss a specific set of pre-identified NTMs, potentially more concrete and sustainable results could have been achieved, as exemplified in the case of regional survey in Arab States. Another example relates to TOAM deployment, which was one of the interesting and important results of the Programme. The involved countries found the tool interesting but mentioned it would have been more useful if it would have been shared with neighbouring countries. It is clear that such an approach complicates the implementation of such a Programme. A reduced scope—less beneficiary countries—with more in-depth work could have led to interesting, innovative and multinational solution seeking efforts.
278. In terms of financial data, it is important to manage and classify it in an orderly manner. This serves for monitoring purposes and obviously for evaluation use. In the present case, expenditures by components had to be estimated which is unfortunate and somewhat surprising.

6. Recommendations

279. It is recommended that recommendations are carried out on a matrix management approach, ideally under the overall supervision of the NTM Programme Sponsor. As a core principle for all the recommendations, it is clear that a follow-up is needed in the context of sustainability and impact considerations. To do so, the Programme needs to focus on fewer countries and present a more consolidated and strategic approach to the future implementation. With the less dispersed approach, it will be important to involve, to the extent possible, the same stakeholders initially on-board—during phase 1 and 2. It will be important to set-up a network, involving TISIs, the survey companies, the SMEs and all other stakeholders (e.g. micro-producers, coops, cluster farmers, as well as large lead firms etc.) affected by NTMs, the public sector and the academia, just to name a few, and implement *through* that network. Operationally, this logic will lead to the below recommendations:
280. **Recommendation 1:** To pave the way for sustainability and impact at the beginning of the survey cycle, ensure consistency with partners' and beneficiaries' development needs and priorities. That is first to discuss with government focal point in the field how do they wish to make use of the survey results (e.g. replicating the survey in the future? use the survey skills and tailor to other public sector initiatives?) and confirm their perspectives. Second, on the basis of it, consider who would be the best implementing partners in the country corresponding to the purpose. Third, design a flexible solution addressing the needs of partners and beneficiaries. Fourth use these criteria for the selection of the most suitable services providers while paying due attention to quality requirements for outputs.
281. **Recommendation 2:** to expand the scope and depth of partnership to ensure the required partners' engagement. Externally, when a government requests an intervention, put in front the objective and mechanism for follow-up to attain commitment. Internally in ITC, come out with a coordination approach during the design stage of the interventions in a consultative manner, involving senior management in coordination; design and communicate a transparent mechanism/ protocol about the selection of follow up activities. Externally, when government requests a survey, putting in front the objective and mechanism for follow-up to attain commitment.
282. **Recommendation 3:** : It is recommended to use the information and data already collected and aggregated deep solution oriented analysis to mitigate the negative effects of NTMs on SMEs and improve their international competitiveness. Conducting such an exercise would create a momentum to bring back and converge the attention of all stakeholders previously involved in the Programme. The solution-oriented analysis y could focus on specific regions, potentially where TOAM or the surveys have been conducted most recently, for more chances of success. Another example of a meta-study that could be developed using aggregated national data to a regional and even global level would be through a specific GVC. This would be of particular interest of all stakeholders, of all types, involved in that specific GVC. There is also an opportunity to involve the private sector but from the high end of the GVCs: they could eventually even finance some of these activities through impact investment and through their Corporate Social Responsibility (CSR) branches, but also for the well-being of the GVC itself and their own profitability.
283. **Recommendation 4:** Consider the replication of TOAM and the use of data generated to address NTM related obstacles. It is recommended to replicate the TOAM deployment in other countries and regions in addition to supporting the follow up on the two that have already been deployed. TOAM was the most successful element of the Programme in creating tangible results built on the data generated. To ensure that action plans are developed, that they are implemented and that ITC keeps its momentum and positioning in finding solutions to the NTM related issues, what has been generated through the Programme needs to be used.
284. **Recommendation 5:** Consider TISI- and enterprise-specific actions in initiatives to mitigate NTM related obstacles. To develop tailored follow up action for TISIs and enterprises, in conjunction with relevant in-house expertise; to identify relevant interventions and integrate them into the ToC.

285. **Recommendation 6:** In the successive phase of the Programme, consider integrating the Programme into the overall ITC programming and management. In the successive phase, the rich, technical and research-driven approach of the NTM Programme should be streamlined into a solid, longer-term programmatic perspective, including the identification of complementarities with the other agency's Sections. This would entail integrating the Programme into the overall ITC programming and management.. As already mentioned, the survey companies have acquired the needed knowledge to replicate the NTM surveys. However, without demand for replication, the knowledge will be lost. Therefore, in parallel, it is important to continue looking for funds to implement specific projects to render actionable the contents of the reports already generated.

Technical suggestions to the attention of the Trade and Market Intelligence Section:

286. **NTM Survey:** (a) At the survey design stage, consider capacity-building needs for the implementing partners in case of technical insufficiency. (b) Enhance the communication and product dissemination activities, including publishing the NTM report rather soon after the stakeholder workshop, in order to keep the momentum and ensure data validity.
287. **NTM database 1:** (a) For effectiveness but also efficiency purposes, it is recommended to use current, updated data collected through the surveys to cross-inform the NTM database, and vice versa. This would enhance the internal logical structure of the programme and increase the potential for dissemination of the relevant data generated through the Programme. b) design and deploy a monitoring, feedback, and communication system in order to reflect and promote the utility of the database, especially to the enterprises. Based on the user feedback, to adjust the database's functionalities, update frequencies, or to consider stop ITC's data collection activities and extract data from partner organizations. (c) Developing an ITC specific database has its advantages. However, it is worth reassessing the partnership model and leveraging on other existing databases, for example sharing the UNCTAD database, and focusing on disseminating the data with an enterprise friendly approach.
288. **TOAM:** to engage and use existing national coordination platform to enhance the problem solving aspect of TOAM; the National Trade Facilitation Committee can be a potential partner, as it has a legal obligation to report on the progress of TFA implementation, therefore enhance the incentive for national governments to maintain this tool for monitoring purpose and to solve the obstacles reported, particularly procedural obstacles.
289. **Services** – Pursue work specifically in the services sector
290. **NTM Programme successive phase:** In the context of a similar programme, it is highly recommended to conduct a mid-term review. In this Programme, such a review could have been conducted between phases 1 and 2. This would have surely helped push forward the development of a solid theory of change earlier on.