

EPRM evaluation

Evaluation report

20 July 2020



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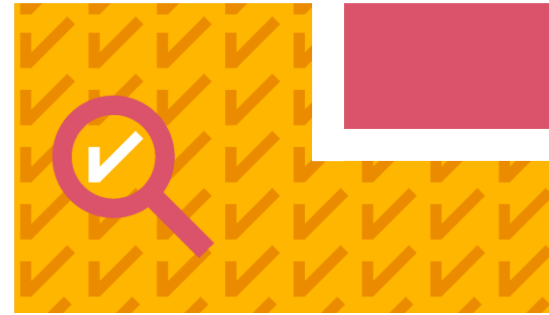
Introduction

EPRM Programme context

The EPRM is a multi-stakeholder partnership established in 2016 with the goal to create better social and economic conditions for mine workers and local mining communities, by increasing the number of mines that adopt responsible mining practices in Conflict and High Risk Areas (CAHRAs).

In 2017 the Conflict Minerals Regulation, drafted by the European Commission (through cooperation and a consultative process), was passed by the EU, and will go into force on 1 January 2021. 'The regulation requires EU companies in the supply chain to ensure they import these minerals and metals from responsible and conflict-free sources only.' The EPRM was originally initiated as initiative to accompany the regulation and help prepare stakeholders for its successful implementation.

The EPRM brings a European (and increasingly trans-continental) multi-stakeholder face to the world of responsible sourcing. EPRM engages with willing organisations on stimulating responsible production by funding mineral projects in CAHRAs and via outreach and other activities to create more awareness on responsible sourcing.



Purpose of this evaluation

The evaluation is of formative nature: it is intended to provide insights on processes that are **going well** (and should be continued) and on aspects that **can be improved** to increase the effectiveness of the partnership. The main value of the evaluation thus lies in providing the MFA and other involved stakeholders with insights and guidance on learning opportunities.

In **section 1** we describe our approach in more detail. In **section 2** we present the detailed findings and recommendations. Then in **section 3** we present the conclusions and main lessons to increase EPRMs effectiveness.

To gain a fast understanding of the outcomes of this evaluation we refer to the **High-level Summary** (separate document) or [section 3](#) of the report.

1

Evaluation

approach

1.1 Evaluation framework

The evaluation covers the entirety of the EPRM. In order to assess the many aspects of the partnership, we distinguish **four interconnected levels** that are building blocks of an effective programme. We assess EPRMs performance on these levels, taking into account how they support and complement each other. Below we describe this structure. For all levels we have used suitable evaluation frameworks (Annex 4) and models to assess performance.

EPRM Program Design & Set-up

A. Relevance & Coherence

Vision and mission – the EPRM programme mission and vision;

Programme approach – articulating the rationale and strategic approach of the EPRM programme and how this relates to other initiatives (**Relevance**).

B. Organisation level

Programme governance – detailing the roles & responsibilities, procedures, principles, and processes that are in place to ensure that the programme and the funded projects are effectively governed.

EPRM Program Operating Effectiveness

C. Programme level

- **Structure:** outlining the principles, processes and methodologies that guide the management and delivery of activities;
- **Activities:** including membership attraction and engagement, communication and outreach, information sharing, convening.

D. Project (portfolio) level

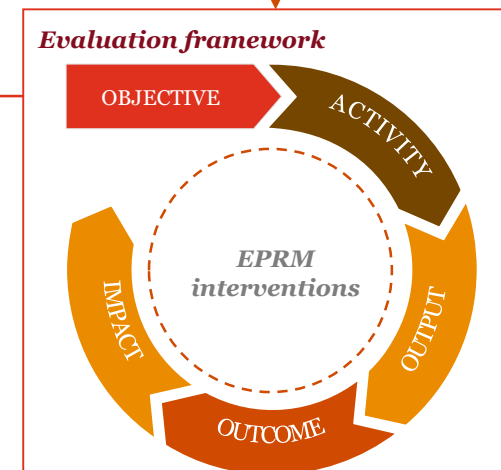
- **Management:** project selection, management, monitoring & evaluation.
- **Projects:** funding, engagement.



The High performing organisations model provides a framework with 4 characteristics of well running organisations and teams.

- **Aligned goals:** all parties are committed to a compelling purpose and share leadership.
- **Agility:** The team rapidly responds to change in order to achieve its goals.
- **Collaborative behaviour:** parties respect diversity by making best use of each others strengths.
- **Clarity and accountability:** There are clear roles and effective ways of decision making and communicating.

In assessing EPRMs organisational set-up, we implicitly use the HPO model.



We use an evaluation framework to assess effectiveness of EPRM. This includes:

- **Chain of effects:** The evaluation framework describes what the intended results are and what the programme undertakes to reach these (activities).
- **Intervention logic:** The framework then describes the intervention logic, which makes assumptions explicit.

The framework allows us to assess if the intended effects have been realised (in relation to targets) and if and how the intervention mechanisms worked.

1.2 Key evaluation questions

We assessed the 9 key evaluation questions in the table below.* The table indicates to which evaluation level each question relates. The evaluation levels and the evaluation questions form the structure of the main section of the report, where we present our findings and recommendations per level and per question.

Evaluation aspects	Evaluation questions
Relevance	1 What is the added value of the EPRM in the current landscape of global mineral initiatives?
Organisation	2 How is the EPRM Secretariat (by RVO.nl) functioning and what could be improved?
	3 To what extent is the Governing board functioning well?
	4 Are current members actively engaged in the membership and/or is there room for improvement?
	5 To what extent does MFA contribute to the program of the EPRM?
Programme	6 To what extent have planned activities of EPRM been implemented and are the interventions of EPRM effective?
	7 How effective is the EPRM in committing companies to the partnership and contributing to their commitment to source responsible minerals?
Project	8 To what extent are the current interventions of the funded projects by the EPRM effective and do they fit with EPRMs goal?
Learning	9 How can the EPRM increase its effectiveness?

* The inception report presented 10 questions. We decided not to include a separate question on EPRM processes and structures, because we felt this was sufficiently covered in the findings on the other questions.

1.3 Collected data

We used a **combination of methods** of (mostly qualitative) data collection and **triangulated** these where possible. Below we present the information collected and analysed as part of the evaluation. In the tables we indicate any changes to the collected data.



Desk study

We **reviewed relevant documents** that have been developed (at least since the baseline study). We have received relevant documentation from the EPRM Secretariat. Since the evaluation reflects on the extent to which goals have been met and previous recommendations were implemented, we have extensively used EPRMs strategic plans, progress reports and previous evaluations. A full list of the documents reviewed is listed in Annex 3.

Interviews



We **interviewed key informant** to collect more in-depth information and from multiple perspectives (private/public/CSO, members/non-members). We carried out 15 interviews. This included stakeholders that are not (yet) involved in the programme and could provide additional points of view. In some cases we did interviews with 2 or 3 people. A full list of interviews is included in the Annex 2. In addition, we listened-in with the **government pillar call and a board meeting** to support interview findings with first-hand observations.

Case studies



We have assessed four case studies, of which the latter two are completed projects. We used interviews (including partners & beneficiaries for CAPAZ and an EPRM member as a potential partner for the blockchain project) and desk study.

1. CAPAZ (1&2): The Passport to Markets Programme (Colombia)
2. The Artisanal Mining Women’s Empowerment Credit & Savings Project (Democratic Republic of Congo)
3. Blockchain-based traceability and data reporting system (Rwanda)

Remark	Effect
We developed a list of documents for review. We have received most documents by the secretariat but not all.	We might have missed some relevant information that was not received. Given the amount of documents we did receive, we expect the effect will be minimal.
The EPRM new M&E framework lists indicators that will be tracked. These are so far, however, not systematically managed and were thus not available.	On some questions we have not been able to obtain information on exact results. Through interviews we did get sufficient information to draw conclusions.

Remark	Effect
One of the non-member companies was hesitant to meet because they knew little about EPRM. After several attempts to plan the meeting it did not take place.	Effect is low since we had sufficient stakeholder interviews and were able to speak with two other non-member stakeholders.
We were not able to join a private sector and CSO pillar call. The former because they are not held any longer. The later because it was planned outside the evaluation period.	Effect is low. We did join a Governing Board meeting and a public sector pillar call. These gave a good impression of the functioning of EPRMs governance.

Remark	Effect
Ideally we would have spent time in person with the Secretariat team to go through project selection, management and M&E in more detail. Given the COVID 19 crisis this was not an option.	We might not have the full picture for all of the Secretariat’s policies and processes. We did have several calls throughout the evaluation to get input and validate our findings.
While we were not sure if it would be feasible to include beneficiaries, for the CAPAZ project we have been able to speak with a miner cooperative representative.	While the representative was presented by the implementing organisation and it is a small sample it did allow us to cross-check results with a local stakeholder.

2

Findings & Recommendations

Reading guide




In the next sections we present our findings on the **evaluation** questions, based upon the following sections:

- A. Relevance and coherence**
- B. Organisation level**
- C. Programme level effectiveness**
- D. Project level effectiveness**

Each section starts with the **evaluation question** and the respective **answer to the question**. We then present the underlying detailed **findings** and related **recommendations**.

- Each finding and recommendation is **numbered** per section (e.g. A1 for the first recommendation of section A and C3 for the third recommendation of section C). In some cases clickable links are included that allow the reader to navigate to related sections.

In the tables, for each **finding**, we also visually indicate the extent to which results have so far been accomplished and whether further improvement is required. This is indicated with the following 'traffic light' scoring:

	Realized / effective
	Partly realized / partly effective
	Not realized / limited effectiveness

For **recommendations**, we also visually highlight recommendation that are of specific value and that form part of the main lessons ([section 3](#)). These are strategic recommendations, essential changes and quick-wins. This is indicated with the symbols below:



Strategic



Essential



Quick-win

A

Relevance &

Coherence

Relevance and Coherence

Evaluation question 1. What is the added value of the EPRM in the current landscape of global mineral initiatives?

Conclusion on evaluation question: The EPRM clearly has a meaningful role to play in the responsible minerals landscape: it fills a critical gap in the landscape connecting stakeholders across the value chain (multi-stakeholder character) and in funding on-the-ground projects. Additional actions are however required to enable EPRM to fully grasp the potential of its unique multi-stakeholder character.

EPRM has a role in supporting and promoting the EU Conflict Minerals Regulation and due diligence standards among supply chain companies. In this regard, however, it is not always clear what type of outreach is logically done by EPRM vis-à-vis the EC itself (DG Trade and DG Grow). EPRM needs to continue aligning with the EC to ensure the EPRM as multi-stakeholder program can play its part in making sure resources related to due diligence are used effective and efficient (no duplication of efforts).

The potential for EPRM to contribute to developments in responsible minerals is apparent and could well increase (with the EU regulation shortly coming to force, increasing demand for 3TG minerals for a wider set of technologies, and growing acknowledgement of the importance of artisanal and small scale mining (ASM)). To live up to this potential EPRM should continue aligning its internal strategy.



Relevance of EPRM

	Findings	Recommendations
A1	<p>Supporting the EU: DG Trade (Trade across EU borders) and DG Grow (Internal Market, Industry, Entrepreneurship and SMEs) have a main role in outreach and communication on the regulation, namely, to inform European companies that will be affected and support them in meeting the regulation. As the assessment memorandum (p.5) indicates <i>'The EPRM is developed as an accompanying measure to the EU Regulation on Conflict Minerals, that focuses on due diligence by European companies'</i>.</p> <p>In terms of bringing together stakeholders, EPRM has a clear added value to what the EU is undertaking. It is noted by several respondents that with regard to awareness creation activities that are being organized, the distinction between what EPRM can best undertake and what the EU will do itself is not always clear. 'With regards to capacity building, there is a need to make sure the EPRM products are aligned with and of added value to the work of the Commission and not duplicative' (EPRM member).</p>	<p>Set out together with the EC how EPRM can further enforce contributions to the EU conflict minerals regulation, making sure it is clear for all stakeholder what DG Trade and DG Grow will undertake and what EPRM can do in addition.</p> <p>Also in this regard, particularly the role as multi-stakeholder program should be utilized, e.g. by contributing the EU conflict minerals regulation through offering a framework for connecting all stakeholders impacted by the regulation and ensuring proper knowledge sharing.</p>
A2	<p>On-the-ground: From the onset of the EPRM its role in supporting on the ground initiatives in CAHRA's was a cornerstone of the partnership. This is also fully aligned with the EU regulation's goal to help break the link between conflict and the illegal exploitation of minerals. In the EPRM scoping study (2016, p.19) EPRM is set apart from other Multi Stakeholder Initiatives on responsible 3TG minerals, pointing out EPRM is <i>'aimed at making mineral supply chains sustainable and making a difference on the ground in conflict-affected and high risk mining areas and in the EU industry sourcing minerals.'</i> The added value of EPRM in funding projects on the ground is broadly recognized and considered a key strength. <i>'it has a role to play as it really funds projects on the ground'</i> (EPRM member). It is also noted that EPRM is aligned with other organisations and initiatives that invest in ASM mining and supply chain projects.</p>	<p>EPRM on the ground presence is considered a key value of the program and differentiator from other initiatives in the responsible minerals landscape.</p> <p>Continue differentiating EPRM by being more targeted and communicate clearly (a) why EPRM is funding the projects it is funding and (b) what EPRM stakeholders are learning, achieving and changing as a result. What is, for example, EPRMs 'value-add' compared with bilateral donor projects.</p>



Relation to other initiatives

	Findings	Recommendations
A3	<p>Other minerals MSPs: In the assessment memorandum of 2016 MFA showed awareness of similar Multi stakeholder partnerships (MSPs) and measures to prevent duplication: <i>‘To avoid overlap with the PPA (public-Private alliance for responsible minerals), both initiatives will coordinate their activities closely.’</i> (BEMO, 2016)</p> <p>In practice in the first years of operation, EPRM and PPA have aligned activities and kept informed of each others activities. It is noted that at the start of EPRM engagement was more active (with monthly calls) but since there were limited concrete outcomes and added value, frequency was reduced. Also, there are some active members of EPRM that are also members of PPA. This indicates there is sufficient involvement to prevent initiatives increasingly overlap.</p> <p>Respondents note the unique aspects of EPRM, such as its multi-stakeholder consensus model where CSO and private sector have a more or less equal role to the governments, its pooling of funding and the possibility to fund projects in the EU as well as on the ground in CAHRAs.</p>	<p>To avoid inefficient use of resources and duplication of efforts across various responsible minerals and metals sourcing initiatives and programs, we recommend the EPRM:</p> <ol style="list-style-type: none"> 1. To map and identify other key initiatives and programs (e.g. the PPA) like the EPRM. 2. To determine those who share similar activities as the EPRM. 3. To have regular (e.g.: quarterly) structured interactions with a fixed agenda with representatives of these initiatives and programs.
A4	<p>Other due diligence initiatives: It is recognized by respondents that there are a multitude of initiatives to share (due diligence) information in the metals and minerals landscape, including Responsible Minerals Initiative (RMI), Responsible Jewellery Council (RJC), World Bank Delve database, and recently Due Dilligence ready! (targeting SMEs) by the EC but also numerous initiatives operating in specific territories and supply chains.</p> <p>There are somewhat mixed views on the extend to which EPRM is able to make a distinctive contribution. Some respondents regard the knowledge platform as a meaningful addition, also in bringing together existing sources and linking to other platforms. Others argue that it could do more to develop distinctive information.</p>	<p>Initiatives taken by the EPRM in view of due diligence should be reflected upon in the same manner as recommended above. They should be part of the discussions with other responsible minerals and metals sourcing initiatives and programs.</p>



Coherence of strategy

	Findings	Recommendations
A5	<p>Dual strategy: From the interviews it appears that some companies prefer less focus on due diligence and more on supply chain integration. Some government members on the other hand tend to focus more on the due diligence in relation to the EU Conflict Minerals Regulation. This is however not a strict division, as one of the government members mentioned '<i>upstream projects are even more important than due diligence, and more at to core of the program</i>', while also acknowledging the need for downstream work on due diligence. Nevertheless, there appears to be a tension in where different members feel emphasis should be placed.</p>	<p>It would be good for EPRM to continue strategic discussion amongst its members on the key activities of EPRM. We support earlier evaluation findings noting that more time should be dedicated to such discussions.</p> <p>Supply chain integration activities and projects can always contribute to enhanced due diligence. Further embedding and linking due diligence aspects into supply chain integration activities and projects will allow the EPRM to contribute to the different strategic focus of the various members.</p>
A6	<p>ASM focus: According to several respondents the focus on ASM is key to the EPRM and contributes to its added value. One of the public sector members pointed out the increased interest and awareness for the ASM, pointing to the opportunity of EPRM to become more prominent.</p>	
A7	<p>Minerals focus: The assessment memorandum (p.3) motivates the focus on 3TG minerals, noting the EPRM '<i>is developed as an accompanying measure to the EU Conflict Minerals Regulation, and therefore has the same scope in terms of minerals and issues that are addressed</i>', but already indicates that the partnership '<i>will expand its focus to other minerals</i>'.</p> <p>While other initiatives often include at least some of the 3TG minerals, the specific focus of EPRM on 3TG is not so common and allows it to make a more focused contribution (at least in the initial stage of the partnership). In EPRM board and member meetings as well as working groups the option to expand has been discussed and it has been decided not to expand the minerals yet.</p>	

B

Organisation

level

EPRM Secretariat

Evaluation question 2. How is the EPRM Secretariat (by RVO.nl) functioning and what could be improved?

Conclusion on evaluation question: Stakeholders recognise the valuable and instrumental role the secretariat plays in the EPRM program, certainly from an administrative and operational perspective. Additionally, stakeholders underlined and highly appreciated the enthusiastic, open and constructive way of working by the secretariat. The overall functioning of the secretariat has improved over the past years but various stakeholder point out that taking the EPRM program to the next level will require a secretariat with deeper industry and subject matter knowledge. It is generally felt that the secretariat can still become stronger and more self-contained (a pro-active driver of the EPRM).

	Findings	Recommendations
B1	<p>Agility of the secretariat: Some members as well as the secretariat itself indicate that the functioning of the secretariat and its availability to support members has improved over the past years. The efforts made by the secretariat and the results realized should be appreciated: <i>'the secretariat has done a very good job in setting up the multi-stakeholder partnership in a very pragmatic and fast manner'</i> (EPRM member).</p>	<p>The secretariat should be aware of the value it has and thereby move forward with confidence and continue building on the strengths: the efforts made by the team, its learning/adjusting capacity and its practical management competencies.</p>
B2	<p>More initiative and expertise desired: several stakeholders note that deep conflict minerals knowledge and active involvement in the sector is lacking in the secretariat. This is required for:</p> <ul style="list-style-type: none"> -<i>(Pro)active sector engagement:</i> to anticipate events, gain visibility & exchange expertise (see C6) -<i>Outreach:</i> engage with stakeholders, represent EPRM and gain their interest (see C10) -<i>Managing growing portfolio:</i> understanding project challenges & providing support (see D5) -<i>Steer on strategy:</i> sensitivity to sector & political context, and help envision EPRMs role (see B5) <p>It is recognized that team members with longer involvement in EPRM have picked up well. However, rotation of staff and staff working on different programmes limits this tendency.</p>	<p>Strengthen the secretariat by including extractive industry expertise in order for the secretariat to be better equipped to handle these requirements for the partnership to thrive. Consider doing this either directly to RVO.nl or indirectly through its members (e.g.: GIZ, advisory committee) or by contracting of external subject matter expert(s) / advisor(s). This can be done at ad-hoc basis, or preferably (given the structural need), as part of the partnership's structure.</p>
B3	<p>Resources of secretariat: Over the past years the capacity (FTEs) of the secretariat has gradually increased. This growth matches growth of the partnership. In line with findings from previous evaluations of EPRM, we find that capacity of the secretariat should further increase, certainly if the EPRM wants to continue growing and scale-up its efforts (see C10). The secretariat considers capacity sufficient but also indicates it has to be selective in activities it undertakes.</p>	<p>Increase available resources: Increase employees dedicated to the EPRM and consider staffing (RVO.nl or external expertise) employees full time to the program and for specific technical tasks. A strategical staff planning – comparing capability needs to staff profiles - together with the Board can form a good start.</p>



EPRM Governing Board

Evaluation question 3. To what extent is the Governing board functioning well?

Conclusion on evaluation question: Overall the organisation and functioning of the board and its members is perceived as effective. The changing chair is appreciated by various stakeholders and nudges members to think in depth about the program. Reiterating recommendations from previous studies, the focus of the governing board should further evolve to more strategic discussions and decisions, with support and guidance of the secretariat to ensure more efficient and effective meetings.

	Findings	Recommendations
B4	<p>Democratic structure: The governing board structure is designed well. It stimulates involvement and gives a sense of ownership for all stakeholder groups. It is based on democratic principles with equal representation from each group (government, private sector and CSO) and clear consensus rules (in line with best practices, see Schleifer, 2019). There might be a risk in changing ‘captain’ annually, but since the next chair is often already board member, there is generally sufficient continuity.</p>	<p>The Governing board structure of EPRM is a suitable approach. If it continues to self-improve it has the potential to further increase effectiveness. The annual self-assessment that EPRM has applied, at least in the first years, can be a good mechanism for this. The Board and the secretariat should agree what form of internal learning works best (making sure it is constructive and manageable).</p>
B5	<p>Strategy focus: The board is responsible for the long-term success of the program and should provide space for strategic discussions and decisions which go to the core of the program. Members seem to agree that this is currently insufficiently safeguarded:</p> <ol style="list-style-type: none"> Board calls: Too much time is spent on administrative, operational and other items. The balance between practical decisions and more strategic topics (e.g. membership strategy, financial strategy, portfolio management, key activities, tracking results) could be better. Live member meetings: these should really be used for strategic discussion (e.g. due diligence approaches, supply chain cooperation, down-stream challenges etc.), but even here not enough time is being spent on topics of strategic importance. 	<p>Put EPRM strategy and ToC at the centre of board activities: Strategy and the Theory of Change should be one of the central elements of the board’s activities; enabling the board to connect each discussion, decision and action taken to the hearth of the program. Make further practical improvement to information management to support decision making (e.g see C7 and D2).</p> <p>To make sure the daily operation and key decisions are aligned with mid- and long term strategy, consider assigning an executive (program) director who makes the bridge between the secretariat and the board (but has a more hands-on and structural position than the current chair). The director is responsible for the operational execution of the program, translate the mission and vision of the program and the board into activities and reports to the board. We suggest some options to organize this in a ‘lean’ way as part of the main lessons.</p>
B6	<p>Agenda setting: Board meetings are perceived as useful and well prepared, however the agenda is often too heavy and includes agenda points which are too operational and organisational of nature (see also above finding). The secretariat has an important role in preparing the agenda. Some improvements have been made, such as labelling of agenda items (decision, information etc.) and division of tasks for subgroups of the board to work on and report back on.</p>	



EPRM members

Evaluation question 4. Are current members actively engaged in the membership and/or is there room for improvement?

Conclusion on evaluation question: Overall engagement of members and members representation is assessed as working well. The three pillar structure is highly appreciated and the working groups have substantially increased the direct involvement of the membership in the work of the program. Stakeholders indicate that increasing the membership base (esp. Upstream and Governments) and participation to working groups should be a focus point.

	Findings	Recommendations
B7	<p>Participation in working groups: Organising members in pillars has allowed for exchange and alignment. A community of knowledge is created (especially for the CSO pillar). Working groups have allowed members to become more active. <i>‘There is some room for even further incentivizing members to participate in the working groups, and to support with other challenges such as membership development’</i> (EPRM member). There are suggestions for additional working groups, with mineral specific working groups having most appeal.</p>	<p>Allow members to set up additional working groups with a clear focus on specific (e.g. mineral) content. Off course, the risk of creating too many working groups lies at wait. The (potential) benefit of stimulating more meaningful interaction and allowing members to have a more active role justifies creating additional working groups.</p>
B8	<p>Managing industry pillar: particularly for the expanding private sector pillar engaging all members appears to be challenging. It was noted that previously pillar calls were organized but that this was recently abandoned. This appears to hold the risk that there is less consultation of the private sector pillar in decision making.</p> <p>In relation to this, the difference in how active members are is considered a big challenge for which a solution has not been found. <i>‘The supply chain pillar has members which aren’t active at all, some are more watching from a distance’</i> (EPRM member).</p>	<p>Reinstall the calls to make sure members are properly consulted. To keep it manageable, it can be considered using a layered structure with supply-chain-level subgroups within the private sector pillar with 1 representative per group in the consultation calls.</p> <p>Some form of tracking non-active members and interacting with them could help EPRM learn where it can improve (and prevent greenwashing).</p>
B9	<p>Interpillar communication: the pillar structure is appreciated and balanced in terms of representation. However some feel that communication between pillars is limited (although working groups help in this regard) and exchange of knowledge could be more. It is recognized that the CSO pillar is actively trying to share knowledge with the other pillars and even mediates expertise from CSOs outside the partnership (some of whom do not want to cooperate with companies/governments directly).</p>	<p>Increase interpillar communication. Networking events and the working groups are already great spaces for this. To optimize the value of the multi-stakeholder nature, seek as many additional opportunities as possible to link them.</p>



Role of MFA

Evaluation question 5. To what extent does MFA contribute to the program of the EPRM?

Conclusion on evaluation question: Stakeholders recognise the importance of the Dutch Ministry of Foreign Affairs in the establishment of the EPRM program and consider the financial contribution and support as instrumental today and going forward. Their role as frontrunner of the initiative is highly appreciated. Given that there is now a running partnership, it would be logical for the MFA to continue its role and aligning its other responsible mineral activities with the partnership. Managing organisation RVO.nl (the secretariat) experiences the contribution of MFA as constructive and the working relation with the different representatives as very proficient.

	Findings	Recommendations
B10	Driving role of MFA: especially in the beginning EPRM was considered a Dutch initiative with the involvement of MFA and the secretariat. It is noted that this has changed over the years and it has now a more international appearance and membership. There is a perceived need for the MFA to continue managing and pushing the initiative as they have been doing. Particularly with responsible business conduct (RBC) raising in importance.	Additional funding by other governments required: Funding by the public sector remains key for the EPRM program. Government membership base needs to further grown to increase the resources available to the program and allow scaling up of projects. Also for the financial sustainability of the programme this is desirable. (Also see section on strategic financing).
B11	Funding: Before involvement of DG DEVCO, MFA was the primary funder, who made the first 4 tender projects possible. The MFA still funds the largest part of the management costs. At the same time MFA is funding responsible minerals initiatives via other channels. There might be an opportunity for coherence of internal policy and programmes.	
B12	Collaboration with secretariat: The secretariat notes that they are well connected with MFA (the current representative and previous ones) and communication goes well. During the chair term of MFA, they have actively worked with the secretariat to discuss improvements and expectations. One challenge might be the double role that is experienced ('client' and board member), which makes it less clear at times which 'cap' they are wearing, especially when MFA is also chair.	The working relation between MFA and the Secretariat is important for both sides. It will help to have clear agreements, which to a large extend is the case. To further improve this: <ul style="list-style-type: none"> • Jointly discuss the benefits of formalizing the management agreement (from MoU to partnership with legal status). • Make sure the different roles of the MFA are always clear, especially since there is one focal point from the MFA.

C

Programme

level

Effectiveness

Effectiveness of activities

Evaluation question 6. To what extent have planned activities of EPRM been implemented and are the interventions of EPRM effective?

Conclusion on evaluation question: In general we find that not all planned activities have been realized. It is not always clear whether it was jointly and formally decided (by the Board) to change the focus of some of the originally planned activities (e.g. less emphasis on training to SMEs). It appears this is the result of a mix of factors, including other priorities in the initial programme stage and perceived higher additionality with other activities. For activities that have taken place we see that EPRM is making great efforts to make them as impactful as possible. This includes learning from earlier experiences (e.g. with the knowledge portal) and revising activities. We do note that in the light of the nearing start of the EU regulation requirements and the apparent gap in alignment of responsible mineral initiatives, EPRM could undertake additional activities (e.g. support for EU companies and panels for pooled resources) to increase its impact. This would likely require additional capacity.

In the sections below we address the extend to which the following activities were realized and their effectiveness:

- Knowledge platform and awareness creation
- Strategic finance coordination



Knowledge platform & awareness creation

How effective are the knowledge platform and communication activities in bringing together relevant information for supply chain actors?

Conclusion: One of the main purposes to found EPRM was its role in creating awareness of due diligence standards. EPRM has build a knowledge portal which is now being re-launched as Due Diligence Hub, after having been re-developed to provide more hands-on assistance to members and non-members. The portal can form a valuable source, given that relevant and up to date information is shared and the target group is reached. It is advised to monitor user traffic and get feedback from users to optimize the portal. There is a real need for the regulation to gain wider attention and EU companies to be prepared for the regulation. To this end EPRM can still play a larger role (in accord with the EC) by undertaking additional (digital) awareness creation activities.

Nr.	Findings:	Recommendations
C1	<p>Knowledge portal: Target of EPRM was to launch the new knowledge portal (Due Diligence Hub) in May 2020 but this has now changed to July. The webinar to introduce the hub was held in April 2020. This received a lot of attention and a large number of companies participated. In 2019 EPRM also started developing a Due Diligence self-assessment tool together with the OECD. This is not yet operational and was planned for Q2 2020.</p>	<p>Make sure to get user feedback on the portal (as was done through the webinar). This can be done by adding feedback options on the page itself.</p>
C2	<p>Content of knowledge platform: Respondents mention that an important contribution of EPRM is to help business to get acquainted with the OECD due diligence guidelines. The portal appears to be a good way to contribute to this goal. The new knowledge portal will include more resources and allow companies to tailor these to their position in the supply chain. The knowledge portal is meant to be an evolving platform (EPRM website). Some members feel there has gone a lot of energy (also from members) into the platform, while it adds little value since it only brings together existing sources. In their view the knowledge could have been used to add more value.</p> <p>The secretariat holds a list of ideas to add to the website. Members note there is potential to differentiate the DDH with data and lessons from on-the-ground projects. Another suggestion by members that the secretariat has taken up is a marketplace where new projects looking for funding are presented. It is likely that such additions will require significant efforts to keep up to date while their value depends on how well it serves and reaches its target group.</p>	<p>For each development make an assessment of the benefits compared to the invested time and efforts. Working with minimal viable products and testing of feasibility and desirability, as the secretariat and working group seem to have done, is advisable.</p>
C3	<p>Monitoring use of platform: RVO nor the EPRM working group on the Knowledge portal are using information on the use of the website to get insights on how much the portal is being visited and by whom. One of the members commented that for their own website they can provide web traffic information at any given moment, its straightforward and insightful. Also in the assessment memorandum (p.9) visitors to the website is considered an indicator of awareness results 'number of visitors to the website that gives information on due diligence'.</p>	<p>Tools such as google analytics are free and easy to use and can provide EPRM with valuable insights. The secretariat (or third party) should set this up for the new Due Diligence Hub and integrate this in EPRMs monitoring framework.</p>



Knowledge platform & awareness creation

	Findings	Recommendations
C4	<p>EPRM communication: The secretariat is responsible for communication activities of EPRM. For 2019 EPRM did not set specific communication targets. In 2020 they aimed to have at least 20 activities to increase awareness and outreach (via Twitter, booklets, short films, webinar etc. in 2020). According to the annual report for 2019, similar activities were realized in 2019. These communication activities are mainly aimed at promoting the partnership (e.g. leaflets at events) and internal information sharing (e.g. member meeting booklet).</p> <p>Generally the perception is held that EPRM could have a better visibility. EPRM is often still considered a European initiative while it is open for others. Also in its communication activities EPRM could position itself with more confidence as a key MSI on responsible minerals.</p>	<p>Current communication activities should be continued, particularly those that contribute to outward visibility. For internal communication benefits should be carefully compared to required efforts. When using digital communication (e.g. newsletters) user analytics can help assess what generates interest and should be continued.</p>
C5	<p>Due diligence awareness creation: According to the 5 year strategic plan, “The EPRM will serve as an accompanying measure to the EU conflict minerals regulation and will play an important role in educating and supporting SME suppliers.” In the annual plan 2019 no mention is made of support to SMEs other than the knowledge portal. Activities to support supply chain companies (e.g. training to SMEs) to comply with due diligence standards have so far (almost) not taken place.</p> <p>With the nearing start of the regulation on 1 January it is felt by some members that more could be done to get information out there to help importers comply e.g. through webinars. The EC reflects on this that EPRM could take a larger role here but they should not be over-asked (also given the responsibility of the EC itself).</p>	<p>It is understandable that focus can shift in the initial stage of an MSI. It is important to be clear on the focus of the partnership amongst key stakeholders.</p> <p>While the secretariat is still planning to undertake more awareness creation activities in relation to the EU regulation in the future, it now seems to be the time to do so. Activities should be aligned with the EC (see recommendation A1).</p>
C6	<p>Physical knowledge dissemination: EPRM secretariat and/or members (ambassadors) actively attend events and provide information to other attendees (e.g. by hosting sessions). They presented at the IGF annual meeting (with more than 80 governments present), always attend the OECD forum, and were also present at other industry events (e.g. Tantalum 2018 in London & International Conference on Artisanal and Small-scale Mining & Quarrying in Zambia). It is felt EPRM (Secretariat) presence at industry events should be even more noticeable.</p>	<p>Continue involvement in key events. Attending is of course not sufficient. Actively seek opportunities to make contributions to give EPRM a stronger reputation and profile.</p>



Strategic finance coordination

To what extent is EPRM taking a role in coordinating strategic financing and does this lead to more effective project funding?

Conclusion: The way EPRM pools funding to promote responsible sourcing and mining is two-sided. On the one hand it does so by extending its membership base and mobilizing financial resources from its members. On the other hand it aims to co-finance projects, engaging with existing initiatives and organisations. Over the past years the financial resources for EPRM have increased. There is a shared view that the funding base of EPRM can and should increase significantly. There is however not a clear strategy on how to do so. It appears the objective to pool funding is still relevant and there is a clear case for using and promoting EPRMs multi-stakeholder approach to channelling project-funding. More efforts would be required to identify other funding sources and coordinate these.

	Findings	Recommendations
C7	<p>Financial performance: The assessment memorandum (p.9) notes that <i>“As a partnership, the most important objective for the EPRM is to become financially sustainable, so that it will be able to keep existing over time after DGIS funding has come to an end. For this, it is key that enough new participants are attracted that bring funds to the EPRM.”</i></p> <p>The enrolment of DG DEVCO as member in 2018 and key funder of projects is appreciated. Additional funding from the Foreign and Commonwealth Office in 2018 and 2019 and that of GIZ in 2019 and extending the membership base, particularly with private sector members, has been a step in the direction of strengthening and diversifying funding of the partnership.</p> <p>While at the start of the partnership financial sustainability was clearly considered an important objective, many stakeholders indicate that this actually might not (yet) be a desired situation. It is argued that the funding coming from governments can be used for (larger) projects that might otherwise not be feasible to fund. The potential of EPRM to mobilize funding of private sector is appreciated by members as a key strength and opportunity. At the same time it is realized that the most realistic option to significantly increase funding is through government funding.</p>	<p>There is an absence of a shared vision on the desired funding levels, how this relates to the size and composition of the partnership and the funding by government members vis-a-vis other forms of financing. Develop such a vision as part of the 5 year strategy. Take into account that based on current insights, the original goal for the partnership of financial sustainability, meaning financing largely coming from private sector members, does not appear to be feasible nor desirable.</p> <p>Seek (and carefully way) ways to strengthen the financial contribution of private sector members (e.g. raising fees for large companies or providing an option for multi-year advance payment).</p> <p>EPRM would benefit from financial monitoring and reporting that (visually) gives insights into the contribution and share of different funders. The current annual reports finance sections are, for example, not transparent about membership contribution. This will allow the board to steer on the desired course (in terms of diversification of funding) and particularly the private sector share. In a later stage this could include monitoring of co-funding and pooled resources.</p>



Strategic finance coordination

	Findings	Recommendations
C8	<p>Pooling funding in the sector: One intended outcome in EPRM's theory of change (ToC, 2018) is that "Financial and technical resources are pooled, leading to increased funding and reduced duplication". To realize this "EPRM engages with existing responsible mineral platforms to fund mine conversion programmes" (or "co-finance of project partners" in the new M&E framework).</p> <p>Pooling of funding is now limited to co-funding projects. There are different views on the extend to which funding is available for 3TG projects and initiatives which can be mobilized. Many initiatives compete for the same (limited) funding available regarding 3TGs and CAHRAs. At the same time, the market potential is very big (given the size of the sector and initiatives that exist). It is suggested that much more can be realized by EPRM in terms of linking with initiatives of IFIs (e.g. financing by EIB, World Bank) but requires active engagement to realize synergies.</p>	<p>Pooling/partnering for some issues especially makes sense if EPRM can find partners with particular interests and/or expertise that complements the EPRM's own strengths. E.g. to do more on technology & innovation. Seek shared interests on specific projects (as suggested in the project level recommendations) to actively join forces with other initiatives and IFI-funders. (as with the Due Diligence Hub funding by FCO).</p>
C9	<p>Strong case for pooling of funding: it is noted that many governments and organisations have their own funding of projects. The EPRM provides a multi-stakeholder decision making on what projects to fund. It is argued that this is a way of financing that allows for better informed (multi-sided) decision making. It therefore would make sense to also channel other funding for responsible mineral projects (including from the Dutch MFA) through EPRM. This seems to be a strong case for pooling of funding and for EPRM to actively promote it.</p>	<p>Put this USP forward more prominently in involving other funders.</p>

Effectiveness of outreach

Evaluation question 7: How effective is the EPRM in committing companies to the partnership and contributing to their commitment to source responsible minerals?

Conclusion on evaluation question: The membership of EPRM has increased annually, although at a diminishing rate. Significant outreach efforts have been made and clearly it has paid off. The current target for new members is higher than the new membership in the previous year. This suggests it is part of EPRM's strategy for coming years to expand its membership. Looking at where to target the membership expansion, it will be most meaningful to include more companies across the supply chain - especially upstream members are needed to enable the EPRM to develop projects across the value chain. Also, it is suggested more governments should be engaged.

The nearing start of the EU regulation might well provide opportunities for EPRM to become more prominent as companies (and governments) are confronted with new requirements. EPRM could utilize this momentum and intensify outreach. The example of other MSIs shows that dedicated staff is a requirement for successful outreach campaigns.

	Findings	Recommendations
C10	<p>Outreach efforts: As noted in the assessment memorandum (p.6), all partners are jointly responsible for outreach to other potential partners. In practice, a few active members lead outreach to engage new members.</p> <p>While the role of the Secretariat in outreach is not that well defined, for consistent and effective outreach the secretariat is considered a key body to structurally engage new members. However, members point out instances when the secretariat lacks proactivity in picking up opportunities (e.g. to engage potential members such as RJC or to present at ad-hoc occasions). Looking at success stories of other MSIs, the current capacity of the EPRM secretariat is probably insufficient to really make this leap happen.</p> <p>At the same time, the role of 'ambassadors' from private sector but mostly government members is considered key to enrol new members. E.g. governments could step up in talking to relevant companies in their jurisdiction to become a member.</p>	<p>Having high-profile ambassadors and those with existing relations or leverage positions, perform outreach is often most effective. Mobilize these within the partnership (or from outside) to optimize outreach effectiveness. There are examples of other MSIs that benefited from such a strategy.</p> <p>In addition, use the momentum of the Conflict Minerals Regulation to inform and ignite interest in potential members. The Covid-19 pandemic might provide a challenge. Nevertheless, non-physical forms of outreach can be (as) effective.</p>
C11	<p>Networking: A general (and according to some the most important) benefit from MSIs is the space for networking. Members (particularly CSO) confirm that new relations have been established with other members – both companies and other organisations. These have led to practical outcomes such as working together on project proposals and speaking at each others events.</p>	<p>The value of this informal networking should not be underestimated. It is of course important to create sufficient opportunities to interact. It is recommended to continue current networking activities, and look for new ways to engage (also under the current Covid-19 conditions).</p>

Effectiveness of outreach

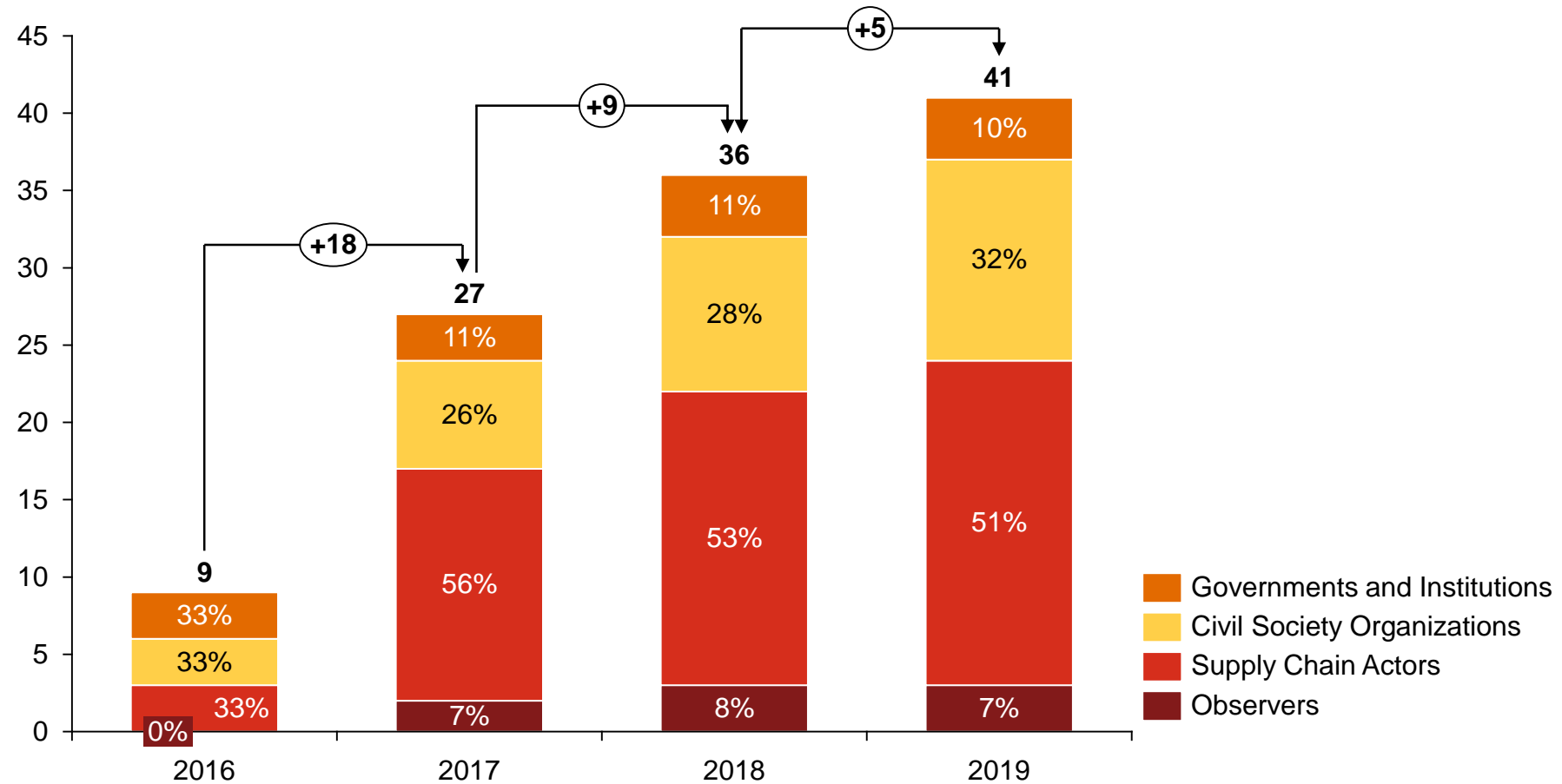
	Findings	Recommendations
C12	<p>Lack of supply chain representation: EPRM intends to convene and forge partnerships between up-, mid- and downstream actors in supply chains. The ECDPM study (2019) points out that particularly downstream companies are attracted, while for mid-stream actors incentives to join might be lacking. We find that this is still the case: EPRM does not have a strong story (or pitch) to stimulate specific company groups to join. At the same time, it is strongly held by almost all interviewed stakeholders that participation of additional members across the value chain should be ensured.</p>	<p>Establish a clearly developed unique selling proposition for upstream companies, especially mining companies and traders.</p> <p>Also, engage on a regular basis with other upstream responsible minerals and metals initiatives (See recommendation A3).</p>
C13	<p>Lack of SME representation: Our understanding is that EPRM would preferably have SMEs as stakeholder group represented in the partnership. The annual plan 2019 states as outreach activity to “Implement the revised EPRM outreach strategy to engage with newcomers like SMEs and other minerals industry users” and the membership webpage includes the membership option for SME associations.</p> <p>So far, EPRM has not been successful in enrolling SME associations. Amongst respondents, there are mixed views on whether SMEs should be a target group for membership and it is argued they “often don't have (human) capacity to join despite low membership fees.” (EPRM member).</p>	<p>It is advised to reconsider if SMEs can be engaged meaningfully, certainly seen the role they play across the value chain.</p> <p>The supply chain pillar could have an SME group and some members could take a mentor role allowing SMEs to tap into resource base (e.g.: Fairphone could do so for other SMEs).</p>



Development in membership







The EPRM has managed to increase membership although the overall trend seems to be fewer new members join each year.

- Breaking this trend will require additional outreach efforts. The target for 2020 is to reach 10 new members.* The secretariat notes that some new members have joined and the target might well be realized.
- While it is not clear to us what the ideal and targeted partnership size for EPRM is, it is clear that it lies above the current size. Better sector representation and greater impact potential seem to be the main drivers for this ambition.
- Furthermore, the relative share of the different pillars appears stable over time. However, share of the private sector pillar very gradually decreases while one would expect this core pillar to at least maintain its relative share in the partnership.



* NB: there is some uncertainty as to the target for 2020, since the M&E framework shows a end-of-2019 baseline of 33 members instead of 41.

Mapping of the EPRM private sector member base to the 3TG value chain

		Upstream			Downstream		
		Miner 	Trader 	Smelter/Refiner 	Component producer 	Manufacturer/Assembly 	End-user 
Companies	Umicore			✓			
	Valcambi			✓			
	Tata steel						
	Signify				✓		✓
	Intel				✓		✓
	NXP				✓		
	HP				✓	✓	
	Philips				✓	✓	
	Samsung				✓	✓	
	Apple						✓
Industry associations & Initiatives	Fairphone						✓
	Drive sustainability	✓	✓	✓	✓	✓	✓
	TIC	✓	✓	✓	✓	✓	✓
	TIN	✓	✓	✓	✓	✓	✓
	IPC				✓	✓	✓
	RMI	✓	✓	✓	✓	✓	✓

The EPRM private sector member base lacks upstream private sector members

- Upstream companies are only indirectly covered through industry association and initiatives, the EPRM member base lacks mining companies and traders.
- No SME's are member directly or indirectly through SME associations (e.g.: SME Europe).

D

Project

level

Effectiveness

Project-level effectiveness

Evaluation question 8. To what extent are the current interventions of the funded projects by the EPRM effective and do they fit with the EPRM's goal?

Conclusion on evaluation question: Feedback and findings against this question are generally positive. While some of the projects from the 2017 call for proposals were arguably not particularly well aligned with the EPRM's Theory of Change, improvements to how more recent calls have been structured should reinforce the links between project portfolio and mission. Three of the four initiatives we reviewed pre-date the introduction of systematic project appraisals and selection which limits the scope for drawing conclusions from our sample for the overall project portfolio. The projects we looked at all appear to have achieved most of their activity and output milestones with support and encouragement from Secretariat staff. Through the development and promotion of the CRAFT market entry standard the CAPAZ projects in particular are on course to contribute to the opening up of downstream markets to artisanal and small-scale miners, thus making a substantial contribution to the EPRM's Theory of Change at impact level.

We are identifying several areas for improvement in line with the EPRM's growing profile, membership and financial resources. Further strengthening the Secretariat's programme management systems and facilitating greater access to technical expertise should create a strong basis for further expansion of the project portfolio. Finding new ways to identify and develop innovative solutions to the issues the EPRM has been set up to address should improve value for money, continue to expand impact and set the EPRM more clearly apart from other funders in the responsible mining space. A particular focus on encouraging private sector members to participate in project development and delivery should not only achieve better results but also reinforce the EPRM's vision of multi-stakeholder partnerships. In this section we present the main findings. [Annex 1](#) contains a detailed case study analysis.



Project effectiveness and management

To what extent are projects reaching set goals (aligned with EPRMs overall goals) and is EPRM managing this?

Conclusion: While the limited timeframe and remote nature of the evaluation makes it difficult to answer the question with a significant degree of certainty it appears to be the case that the four initiatives we reviewed have broadly delivered against the originally proposed activities and outcomes. There is only limited evidence of progress against outcome and impact ambitions because progress reporting does not require implementing organizations to measure and report against these (although the new outcome sheet to be completed by applicants and implementors will change this). During project implementation Secretariat staff work closely with implementors to observe and guide day-to-day progress, help tackle problems as they occur and ensure compliance with expectations on issues such as local ownership and project sustainability. There is clear appreciation of the Secretariat's open and encouraging approach to project oversight but also a sense that staff are stretched for time and that there is not always sufficient expertise to engage with more technical challenges. The Secretariat can draw on technical expertise from Germany's GIZ and BGR for the assessment and scoring of proposals, but this does not extend to implementation when – arguably – subject knowledge is even more important.

Given the breadth of (a) the EPRM's Theory of Change and (b) the specific objectives for the three call for proposals it can be argued that all four initiatives broadly contribute to the partnership's high-level goals. Secretariat efforts to promote projects to an external audience are very much appreciated, but the lack of active engagement from members in project implementation is a source of frustration for some implementing agencies and almost certainly limits scope for sustainability and impact.

	Findings	Recommendations
D1	<p>M&E framework: Through the M&E working group a revised evaluation framework has been developed to track performance of EPRM. This reflects suggestions made in the EPRM baseline study (by Levin Sources). This (and the existence of the working group itself) shows that EPRM takes the evaluations as well as monitoring serious and intends to make improvements.</p>	<p>Also in this regard it will be important to follow through in terms of collecting and managing monitoring information and with processes for internal learning and external communication of lessons (also see recommendation B4).</p>
D2	<p>Manage for success beyond outputs: Evidence for project progress against outcome and impact ambitions is limited. EPRM Secretariat systems and staff efforts have so far been geared more towards ensuring that activities and milestones are achieved. The EPRM Secretariat does not carry out systematic end-of-project evaluations which makes it harder to learn from experience and identify genuine opportunities for the EPRM to potentially scale up and thus maximise its contribution to systemic change over time.</p> <p>Through the M&E working group a revised evaluation framework has been developed to track performance (as suggested by the baseline study consultancy). It appears that the new framework will sit alongside the Theory of Change.</p>	<p>Upgrade and integrate Secretariat systems for more effective and systematic project management and monitoring. Additional staff capacity within the Secretariat may be required. The new framework for outcome reporting could be a step forward if accompanied by other improvements (e.g. greater oversight by and accountability to EPRM members/Board).</p>



Project effectiveness and management

	Findings	Recommendations
D3	<p>Prepare for portfolio expansion now: The Secretariat team has been working very hard to manage project implementation thus far. Their efforts are clearly appreciated by implementors who strongly value the interest and support shown by the Secretariat. However, they also recognise that the team is already stretched. The current round of funding is likely to result in an expansion of the number – and complexity – of initiatives receiving EPRM support which will make it more difficult to continue with the current approach to portfolio oversight.</p>	<p>Carry out a more detailed review of programme management tools than was possible under this evaluation. Consider scope to streamline and harmonise programme management arrangements with a particular focus on identifying risks and opportunities for significant impact (based on systematic project monitoring and evaluation). Focus on greater coherence across the project portfolio by, e.g., clustering projects around specific themes and allocating the required technical and programme management resources to maximise impact and value for money.</p>
D4	<p>Partnerships involving EPRM members from the private sector: Linkages of downstream companies with projects appear to be very difficult to achieve (e.g. the consortium for the Rwanda blockchain project had based their concept in part on at least one EPRM member testing their solution but this did not materialise). The current call for proposals includes explicit requirements for partnerships with upstream or downstream companies which should be a step in the right direction. It will be important for the Secretariat to work with lead implementors to align expectations and ensure meaningful private sector partnerships happen in practice.</p>	<p>Review what might lie behind the apparent reluctance by private sector members to get more involved in projects and discuss frankly within the Board. Consider what could be done to incentivize more active engagement.</p> <p>When approving new projects, agree explicitly with implementors who will be responsible for private sector participation in project implementation, monitor progress and – where necessary – consider reducing/withdrawing funding if private sector participation does not materialise as expected.</p>
D5	<p>Mining sector expertise: Some aspects of project oversight appear to be hampered by lack of mining sector-specific knowledge within the Secretariat. This also limits the EPRM's ability to pro-actively identify and facilitate new partnership opportunities between projects, members and other supply chain actors.</p>	<p>Facilitate access to relevant technical expertise for project oversight. If adding to the Secretariat core team is not a realistic option then consider outsourcing, calling on members (e.g. expanding support already provided by Germany for proposal reviews) or partnering with third-party organisations (see also recommendation B2).</p>



Selection process

How well is the project selection process organized?

Conclusion: The EPRM's sole mechanism for identifying projects for funding is a call for proposals which is currently in its third round. Detailed parameters for each call are agreed by the Working Group for Strategic Financing and then published. Bidders initially submit short concept notes which are reviewed by the Secretariat with technical support from GIZ and BGR. Feedback to bidders is meant to ensure that full proposals align with the EPRM's overall mission (no proposals are rejected at concept stage). Full proposals go through similar assessment process and final selection is discussed and agreed with the relevant Advisory Committee. The first call for proposals in 2017 was broad and resulted in funding for some initiatives that were less directly linked to the EPRM's overall mission (e.g. AFECOR). Subsequent calls have been more targeted and prescriptive which appears to have led to a significant reduction in interest for the 2018 call. The creation of 'sub-windows' for the 2020 call seems to have been effective in pushing up the number of concept notes. Whether this will translate into a significant number of relevant proposals remains to be seen.

It is questionable whether regular calls for proposal are the most effective way to generate concepts and ideas that can consistently make substantial contributions to the EPRM's higher-level ambitions. Even with very detailed guidance such calls strongly rely on the imagination and resources of potential bidders. The selection process is very resource-intensive and there is no guarantee that projects receiving funding achieve maximum value for money, impact and alignment with the EPRM's mission. Once approved, projects require significant management time - irrespective of their individual contribution to the EPRM's mission - which may be better spent on other Secretariat functions.

	Findings	Recommendations
D6	<p>Alignment with the EPRM's overall ambitions varies: Requirements articulated in successive calls for proposals have been adjusted in order to strengthen projects' contributions to the EPRM's Theory of Change. It might make sense to focus less on generating new project ideas and instead scale up/further develop successful initiatives that have already received funding (as is happening with CAPAZ/CRAFT).</p>	<p>Assess carefully whether the most recent call has generated stronger opportunities than previous calls in 2017 & 2018. Articulate clearly where EPRM priorities lie in terms of focusing on specific partnerships within the value chains for a limited number of minerals vs pursuing broader ambitions to encourage responsible mining practices. Be clear about the EPRM's 'value add' compared with other initiatives. Use more systematic project M&E to identify initiatives with potential to achieve systemic change.</p>



Selection process

	Findings	Recommendations
D7	<p>Ensure proposals are both ambitious and realistic: All three projects we reviewed experienced significant challenges during implementation (see slides on detailed project-level findings). These appear to have been resolved in consultation with the responsible EPRM staff members and detrimental impacts on project success appear to have been limited. However, this does raise questions over whether project appraisal is sufficiently rigorous and based on good understanding of the context.</p>	<p>Consider more rigorous checks prior to project approval e.g. to test commitment by proposed project partners and where project success depends on contributions from third parties. Put in place clear structures for dealing with significant challenges arising during project implementation (including clear parameters for deciding whether, e.g., objectives should be revised, budgets need to change or – in extremis - projects should be discontinued).</p>
D8	<p>Calls for proposals are blunt tools: The EPRM's calls for proposal are well-organised and improvements have been based on experience. However, they naturally generate significant interest from organisations that require funding to implement projects, pursue their missions and for survival. While this is likely to generate a large number of ideas to select from, relying solely on this mechanism to throw up genuinely innovative ideas that are likely to achieve systemic change is labour-intensive and unlikely to be efficient. The secretariat needs to scale now to handle the assessment and agrees that looking at efficiency it is not ideal.</p> <p>In the previous call for proposal the requirement to include a supply chain company as a partner of the project led to a very limited amount of interested parties that went on to submit a proposal. In the new call for proposals the requirement is somewhat softer (supply chain company involvement in some form, backed by some sort of formal commitment). The need to formalize the involvement later on in the process and the negative feedback to bidders if the supply chain link is not apparent, even with 108 expressions received, might lead to few fundable projects.</p>	<p>There is no suggestion that the EPRM should abandon its current approach to project generation, however, there is scope to consider additional mechanisms, for example:</p> <ul style="list-style-type: none"> • Scaling up successful pilot projects based on rigorous evaluation (this could include working with other organisations to facilitate scale-up); • Developing complementary initiatives building on successful work the EPRM (or like-minded partners) is already supporting (e.g. supportive measures to aid the expansion of the CRAFT market entry standard); • Empowering & resourcing the Secretariat to develop 'in-house' solutions to test ideas that are of particular interest to members (and could be scaled up later); • Encouraging members to develop ideas together and/or with relevant third parties to strengthen involvement of supply chain actors in EPRM activities <p>These and other opportunities for more pro-active project development could sit alongside the traditional calls for proposals.</p>



3

Conclusions &

Main lessons

Conclusions

Below we briefly summarize the findings and describe the main conclusions per evaluation aspect and across the evaluation.

Aspect	Evaluation question	Conclusions
Relevance	What is the added value of the EPRM in the current landscape of global mineral initiatives?	The EPRM clearly has a meaningful role to play in the responsible minerals landscape: it contributes to filling a critical gap in the landscape connecting stakeholders across the value chain (multi-stakeholder character) and in funding on-the-ground projects.
Organisation	How is the EPRM Secretariat (by RVO.nl) functioning and what could be improved?	Overall, the organisational structure of EPRM has been set up in an effective way . The secretariat is appreciated for its coordinating role, the board has a good representation of stakeholders and the pillars have linkage to the board. The secretariat and the board have been actively working to improve performance, also to meet member needs.
	To what extent is the Governing board functioning well?	
	Are current members actively engaged in the membership and/or is there room for improvement?	At the same time, there are some challenges, especially for the partnership to become more mature and impactful . The secretariat could be more pro-active and benefit from stronger sector expertise. The board needs to prioritize decision making in relation to EPRMs mission and vision. Particularly the private sector pillar risks loose engagement as it is growing and now has less direct internal interaction.
	To what extent does MFA contribute to the program of the EPRM?	
Programme	To what extent have planned activities of EPRM been implemented and are the interventions of EPRM effective?	In general we find that not all planned activities have been realized. It appears that some activities have not been prioritized in the first phase of EPRM, and are only now taking shape (such as the knowledge portal). There is still discussion about what activities EPRM should take up.
	How effective is the EPRM in committing companies to the partnership and contributing to their commitment to source responsible minerals?	The membership of EPRM has increased annually, although at a diminishing rate. Outreach appears to have been successful but could be further improved to enrol new members and/or deepen partnerships.
Project	To what extent are the current interventions of the funded projects by the EPRM effective and do they fit with EPRMs goal?	The projects we looked at all appear to have achieved most of their activity and output milestones with support and encouragement from secretariat staff. However, several improvements are possible to project selection, monitoring and management, especially as the portfolio grows.

Main lessons

Evaluation question 9: How can the EPRM increase its effectiveness?

The conclusions showed EPRM is in many respects a very effective partnership and it has improved over the years. In this section we focus on what EPRM can do to further **increase its effectiveness**.

The EPRM describes the 5 year plan as follows: “*By the 1st of January 2023, the EPRM will have been able to show that the demand and the proportion of **responsibly produced 3TG minerals** from conflict-affected and high risk areas is increasing and that the socially responsible extraction of minerals that contributes to local development **is being supported**. In addition, the EPRM will have promoted **dialogue and cross-sector learning between upstream and downstream actors** through multi-stakeholder partnership. The EPRM will serve as an accompanying measure to the EU conflict minerals regulation and will play an **important role in educating and supporting SME suppliers**.” (annual plan 2019)*

In this section we relate our integrated findings to EPRM's strategic plan. We present what we consider should be focused on to realize the main objectives for EPRM for 2023: **1) Supporting responsible extraction of minerals; 2) connecting supply chain actors** (up- to downstream); and **3) assisting the EU Conflict Minerals Regulation**. We thereby provide input for EPRM's “roadmap” in the form of steps to increase effectiveness. We do so by integrating recommendations from the report in three sections (related to the three types of key recommendations, being strategic recommendation, essential changes and quick-wins):

1. Decide on & implement the strategic recommendations
2. Revise & revitalize the governance
3. Jointly take responsibility for direct & continuous improvement



1. Decide on and implement the strategic recommendations



Goal 2023	Step to increase effectiveness
Supporting responsible extraction of minerals	<p>Seek opportunities for more pro-active project development outside regular calls for proposal to (a) scale up successful concepts, (b) involve members – especially from the private sector - and address issues they are particularly interested in and (c) promote innovation. This will allow more focused and coherent project portfolio that (a) is easier to manage, (b) more actively involves members and (c) contributes more consistently to the EPRM's mission.</p> <p>Particularly related to involvement of private sector members in projects, we advice to review what might lie behind the apparent reluctance by private sector members to get more involved in projects. Consider what could be done to incentivize more active engagement, e.g.:</p> <ul style="list-style-type: none"> • Encourage members to support project implementation on the ground through practical and/or financial assistance; • Create thematic or mineral-specific working groups and/or project clusters to identify solutions for specific challenges (e.g. technology & innovation); • Showcase successful projects and build coalitions of members (and potentially third parties) for scale up; • Consider providing guidelines and suggestions to private sector members to encourage their involvement in projects.
Assisting the EU Conflict Minerals Regulation	<p>Align on which activities EPRM can do to support the EU regulation. Consider what can be done in the short term (before 1 January 2021) and what can be done to provide more structural support to SMEs. Align these activities with the EC. The strengths of EPRM should be used as much as possible. Think of for example mentorship of frontrunner members who can support other companies or informing governments in CAHRAs about the regulation.</p>
connecting supply chain actors	<p>Deliberate how EPRM can best create alliances across supply chains:</p> <ol style="list-style-type: none"> 1. To this end, increasing the membership base seems desirable, particularly to upstream part of the supply chain, which is almost not represented in the membership. To address this, EPRM should establish a clearly developed unique selling proposition for upstream companies, especially mining companies and traders. Also, outreach should be intensified to overcome the apparent trend of fewer members joining each year. 2. At the same time, it might be desirable for EPRM to focus on realizing smart partnerships with initiatives with other strategic focus or existing representation in CAHRAs. Instead of competing for members, EPRM should seek cooperation with organizations striving for the same goal. Engage on a regular basis with other upstream responsible minerals and metals initiatives. A starting point could be to flag a few organisations to work with more closely.

2. Revise and revitalize the governance

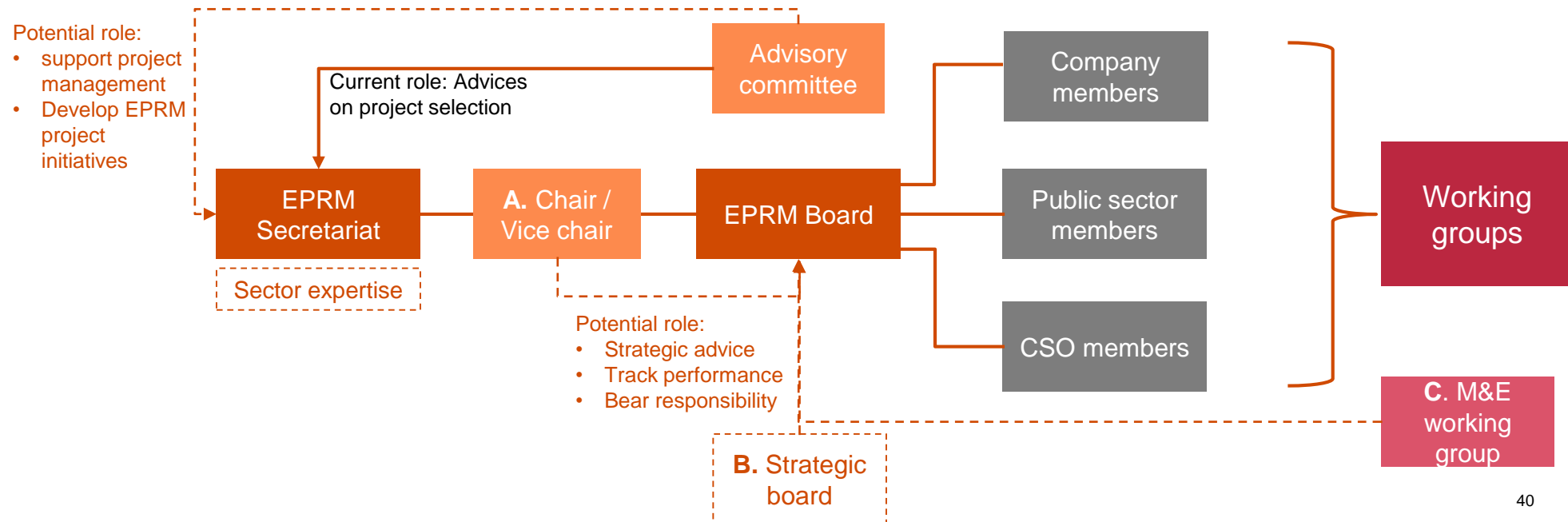


Organisation goal	Step to increase effectiveness
Coordination & management	Strengthen the expertise position (and capacity) of the EPRM Secretariat. Either as part of the secretariat (additional staff) or continuous external support (which could be from members and co-financiers, such as GIZ). They should support with driving EPRM towards its strategy, manage (and instigate) projects, and scale up outreach and/or forging of smart partnerships. For project management, the most obvious option is to extent the role of the advisory committee to also follow-up on projects after selection.
Steering & decision making	Enable the board to really become a steering organ, focusing on strategic decisions and oversee that EPRM stays on track. This will require a stronger and more strategic secretariat and/or appointing an executive program director to support the governing board and manage/lead the operational activities. Through this director (or directing organ), the board should receive relevant information to steer on (integrated reports with information to support their 'helicopter view' – e.g. portfolio & financial performance). Options for this role include: A. Chair & vice chair: represent all pillars; already connect Board and secretariat; annual rotation might not be most effective B. Strategic board: can consist of (active) members or externals; can have multi-year role; would require introducing a new 'layer' C. M&E working group: developed framework linking strategy with performance monitoring; existing group; scope of role goes beyond M&E

Governance model

The visual shows the current Governance of EPRM. With **dashed orange lines** and **text** we make suggestions of revisions to strengthen the governance and revision of roles.

This is intended as input for discussions EPRM should have internally.



3. Jointly take responsibility for direct & continuous improvement



Who	Step to increase effectiveness
Secretariat	<p>To get a better hold on performance of the EPRM and effectiveness of activities, the secretariat (together with the board and a potential strategic team, members and project-partners) can introduce additional monitoring tools:</p> <ol style="list-style-type: none"> 1. For the knowledge portal and website, online analytics tools such as google analytics are free and easy to use and can provide EPRM with valuable insights. The secretariat (or third party) should set this up for the new Due Diligence Hub and integrate this in EPRMs monitoring framework. 2. EPRM would benefit from financial monitoring and reporting that (visually) gives insights into the contribution and share of different funders. This will allow the board to steer on the desired course (in terms of diversification of funding). In a later stage this could include monitoring of co-funding and pooled resources. 3. Upgrade and integrate secretariat systems for more effective and systematic project management and monitoring (including end of project evaluations). The new framework for outcome reporting could be a step forward if accompanied by other improvements (e.g. greater oversight by and accountability to EPRM members/Board).
Governing board	<p>The annual self-assessment that EPRM has applied, at least in the first years, can be a good mechanism to ensure EPRM keeps reflecting on its operation model and continuously improves. The Board and the secretariat should agree what form of internal learning works best (making sure it is constructive and manageable).</p>
Private sector pillar	<p>Pillar calls are good practice to make sure members of each sector remain engaged. The private sector pillar should re-install the calls to make sure members are properly consulted. To keep it manageable, it can be considered using a layered structure with supply-chain-level subgroups within the private sector pillar with 1 representative per group in the consultation calls.</p> <p>Pillar representatives as well as the secretariat can support and motivate members to be more active. Some form of tracking non-active members and interacting with them (understand their needs and think about the role they could take) could help EPRM ensure active membership, actually raise the bar for due diligence and learn where it can improve (as well as preventing greenwashing).</p>



1. Detailed case-study findings

	AFECCOR	CAPAZ I & II	Blockchain-based traceability and data reporting
Implementing agencies	IMPACT	Alliance for Responsible Mining (ARM), RESOLVE	iPoint GmbH, Better Chain, (RCS)
To what extent are projects reaching set goals?	<p>Based on available project documentation and discussions with the implementing agency it appears that:</p> <ul style="list-style-type: none"> The project achieved all agreed activity-related milestones and outputs. The EPRM Secretariat's internal end-of-project review concluded that 'the project has achieved the intended results and can be successfully completed'. There is limited concrete <u>documented</u> evidence of progress against outcomes and impact ambitions although success against activity and output expectations might imply success at higher level of the results chain provided the Theory of Change remains valid. <p>IMPACT included AFECCOR in a separate impact assessment for a related project in the region and concluded that positive impacts had been achieved for women's livelihoods, community cohesion and transition from gold to a cash economy (e.g. 70% of female project participants declared in November 2018 that they started using more cash in daily transactions compared with the start of the project). These findings could be interpreted as evidence of progress against some of the stated outcome ambitions.</p>	<p>Based on available project documentation and discussions with the implementing agency, one of the beneficiary organisations in Colombia and one international partner it appears that:</p> <ul style="list-style-type: none"> Both project phases have achieved the majority of the agreed activity-related milestones and outputs. The EPRM Secretariat concluded that answers from project partners at the end of CAPAZ I had been sufficient for 'the project to be completed positively'. CAPAZ II is still ongoing. Testing of the CRAFT Code at three mining sites in Colombia experienced delays because of local factors but did not unduly affect overall progress. The CRAFT Code has been developed through a successful multistakeholder process and is gaining increasingly widespread recognition as a genuinely different approach to ASM sourcing which encourages ASM operations to sell into international markets based on gradual improvements rather than excluding such operations until they have achieved a minimum international threshold. Several industry associations and international organisations are recognising and using the Code. This number is likely to expand. A small amount of ASM gold was successfully sold internationally under CAPAZ II, indicating successful proof of concept. 	<p>Based on available project documentation and a discussion with two of the implementing agencies it is not straightforward to judge project success against the original plans as set out in the project proposal. This is because:</p> <ul style="list-style-type: none"> The final report is not available, yet. Progress reporting is not clearly following the structure of the results framework included in the proposal which makes comparisons difficult. Disagreements within the consortium seem to have absorbed significant effort. The anticipated participation by at least one EPRM member to test the concept and technology developed under the project has not materialized. <p>The final project report is expected to set out project achievements and challenges in more detail, but from our high-level review it appears that:</p> <ul style="list-style-type: none"> Most of the technical ambitions have been largely achieved. The consortium underestimated the level of effort required to deliver the project successfully (despite iPOINT contributing its own funds). The consortium also underestimated the technical complexity of their approach and the resources required for effective communications and outreach. Without a downstream partner to test the system developed under the project it is unlikely that wider outcome and impact ambitions will be achieved (although iPOINT and Better Chain are likely to continue their search for a partner after EPRM support has ended). The lack of interest from downstream companies may imply that the project's Theory of Change – that downstream mineral users and final consumers demand information on how minerals are produced beyond basic regulatory requirements and that blockchain technology is an effective mechanism to capture and transmit the information – is not or only partially valid.

1. Detailed case-study findings

	AFECCOR	CAPAZ I & II	Blockchain-based traceability and data reporting
Implementing agencies	IMPACT	Alliance for Responsible Mining (ARM), RESOLVE	iPoint GmbH, Better Chain, (RCS)
Significant deviations from the original project concept?	<p>Yes</p> <p>EPRM funding did not include the upfront 'capitalisation' of the revolving savings and loans fund.</p>	<p>Yes</p> <p>Design and implementation of a marketplace to match ASM miners with impact investors and donors has not been established under the project as planned. It appears that lack of interest from potential investors is a significant contributing factor.</p>	<p>Yes</p> <p>a) Consortium-internal conflict and the eventual departure of RCS appears to have absorbed significant time and energy from consortium members and EPRM Secretariat staff.</p> <p>b) The assumption that at least one EPRM member would step forward to test the concept and technology developed under the project turned out to be erroneous.</p>
Did this materially affect project implementation?	<p>It appears that this did not significantly affect project implementation and success. Instead of funding from EPRM, project communities had to build up sufficient savings before lending activities could start. It might be argued that this helped to instil greater local ownership and will ultimately increase the chances of sustainability for the women's credit & savings associations.</p>	<p>Establishing a successful marketplace would be a significant ingredient for future sustainability and impact of the CRAFT model. The apparent lack of interest from investors could indicate that the Code in itself will not be sufficient to ensure access to (semi-)commercial finance and downstream markets. This also calls into question how much progress has been made against two of the three outcome ambitions for CAPAZ II:</p> <ol style="list-style-type: none"> 1. Increased engagement of downstream companies in due diligence and increased sourcing of responsibly produced artisanal gold 2. Education of and engagement of private sector investors in ASM projects, demonstrating proof of concept for ASM financing beyond donor/aid-reliant models <p>While the development, field-testing and dissemination of CRAFT appears to have been very successful there remains a concern that other structural market barriers will also need to be addressed in order to integrate ASM more fully into international mineral supply chains.</p>	<p>a) While it is hard to provide a definitive judgement based on the limited evidence it seems likely that this led some to delays and distractions from the project's overall purpose. It feels surprising that the consortium went ahead with its proposal without greater clarity over roles, responsibilities and how resources would be allocated. It may be advisable for the EPRM to consider requiring formal letters of engagement from all proposed consortium partners before project approval.</p> <p>b) This raises important questions about whether/how EPRM members might be incentivised to contribute to/participate in EPRM-funded projects as well as the role of the Secretariat to facilitate this. It is also essential for the EPRM to reflect on what might lie behind members' apparent reluctance, not least because it may point to weaknesses within the EPRM's own Theory of Change which assumes that demand for responsibly-sourced minerals will increase if downstream companies can be reassured that production and trade are carried out responsibly.</p>

2. Stakeholder interview list

We have carried out 15 interviews with relevant stakeholders. With input from the client and using our own selection criteria we have selected the 15 stakeholders. The selection includes representatives of all main stakeholder groups and also non-member stakeholders *.

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*We had planned to speak with three independent stakeholders. However, one of these was hesitant to participate because they did not know the EPRM that well. The other organisation is IGF which turned out to recently have become a member.

Selection criteria stakeholder interviews:

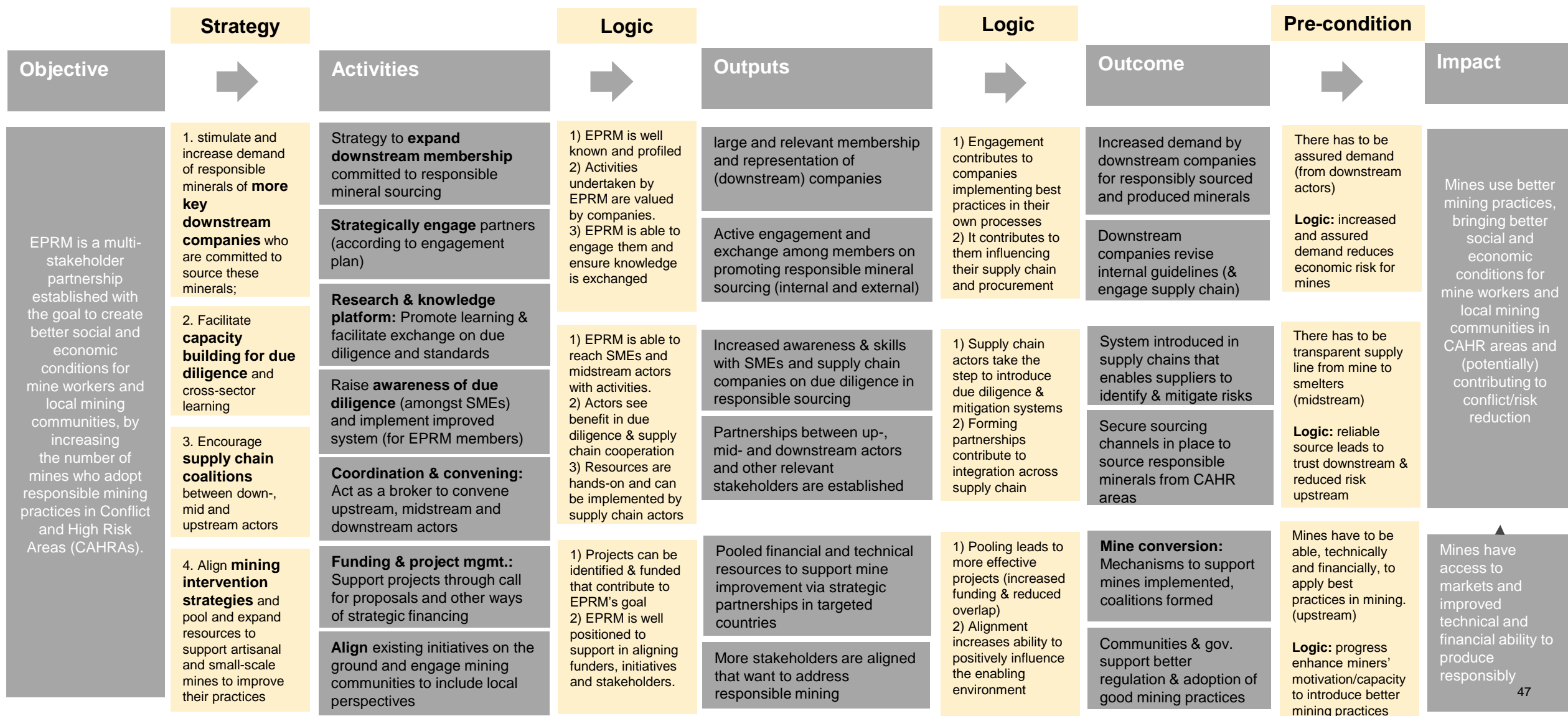
- Long term and more recent involvement
- Sufficient representation of companies and other members
- Aim to include non-members and more independent stakeholders (including observers)

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4. Our evaluation framework

Using the ToR, the new M&E framework and other sources on the ambition, strategy and activities of EPRM, we have developed our evaluation framework, describing the intervention logic. We have used the framework to assess EPRMs effectiveness at programme and project level.



5. Our evaluation team

This evaluation is carried out by a complementary team of **three experts** from PwC and Levin Sources.

Levin Sources

Levin Sources is a consultancy and social venture, that for 10 years has been at the forefront of responsible mining and sourcing, with unique expertise in issues surrounding raw materials sustainability and artisanal and small-scale mining.

Levin Sources drives performance in upstream and downstream mineral economies, creating and optimising the operating conditions that make responsible business conduct possible. Clients include mining companies (improving their strategies, systems, and suppliers), governments (improve integrity, sustainability performance and governance in minerals sectors) as well as NGOs (enhancing management of upstream mineral economies).

Amongst its services Levin Sources performs impact assessments, including the baseline study of EPRM.

Subject expert

Senior expert

Evaluation expert

PwC

PwC offers a worldwide network of member firms and is the largest professional services firm in the world.

PwC Netherlands has extensive experience with Monitoring & Evaluation in the public sector (especially in the field of International Development) and is specialised in qualitative research and project and programme management. PwC Netherlands has successfully conducted various impact evaluations of PPP partnerships and in the field of responsible business, such as Partners for International Business (PIB), Facility for Sustainable Entrepreneurship and Food Security (FDOV).

PwC Belgium has a department dedicated to Sustainable Business Solutions with a key competency in Sustainable Value Chain & Responsible Minerals Sourcing practice. Their clients include mayor mining and mineral companies as well as governments. Their work mainly covers the African region, specifically DRC.

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