

Competition Reforms in Key Markets for Enhancing Social & Economic Welfare in Developing Countries (CREW Project)

Internal Mid-term Evaluation Report

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April 01, 2015

Programme implemented by
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CUTS International, Jaipur

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Acknowledgements

This mid-term evaluation has taken nearly four months to complete and it has been a tough exercise considering that I was the Chief Evaluator and had to conduct the fact finding exercises myself. However, putting this report together would not have been possible had I not received valuable support from my team and the CREW project team.

Sheetal Maheshwari, HR Assistant, and part of my internal support team, helped in organising the key informant interviews. She was also meticulous in coordinating in time with the wide spectrum of stakeholders who were seated in various time zones across the world. Besides, she also helped in transcribing some of the important interviews. I am grateful to her for showing immense patience and providing full support.

Nimra Khan from CUTS Headquarters also helped me by transcribing all the key informant interviews and I am thankful for her support because without this it would have been extremely difficult to assess the interviews.

I also have to acknowledge the excellent support and cooperation received from the CREW Team in Jaipur, especially from Shreya Kaushik, Programme Officer and Neha Tomar, Research Associate. Both were quite supportive in providing timely information and inputs in the assessment process and were also extremely patient. Rijit Sengupta, Regional Director, Africa provided me with the access to all relevant information and ensured this by being unbiased and fair-minded in the assessment process. He has also been the time-keeper in the evaluation process and has endorsed me to deliver the report at various stages of its preparation. I am also thankful for his timely and gentle reminders that helped me a lot.

I am extremely impressed with the commitment that the entire CREW team in Jaipur has shown towards the project. Their enthusiasm shown towards the project reflects quite noticeably. All the other stakeholders also commended their commitment and dedication towards the project.

I should also thank all the Project Advisory Committee (PAC) members, country and research partners and donor representatives whom I communicated with. This evaluation was based entirely on the inputs received from the key informants and would not have been possible without their entrusted cooperation. I am incredibly appreciative of them for being free with me and also for providing valuable insights towards the progress of the project. They also provided inputs that will help chart the future of this project which I am certain will provide positive impetus to the same.

I am also grateful to our internal Editorial team who proof read the document and the Design team who have given this document a thoroughly professional shape and structure.

Lastly, but most importantly, I am extremely grateful to Mr. Subodh Kumar, **Global Monitoring and Evaluation Coordinator, Food for the Hungry, Cambodia**. He has been my mentor and guide on all matters pertaining to monitoring and evaluation since 2011. He provides me with direction and guidance on methods, processes, tools and techniques to be employed for the evaluations that I conduct. He has been my 'Guru' for many years now and I remain grateful to him for always being there to help and guide.

Executive Summary

CUTS International is implementing a project entitled 'Competition Reforms in Key Markets for Enhancing Social & Economic Welfare in Developing Countries' (CREW Project), in four countries: Ghana, India, The Philippines and Zambia and across two common sectors: i) Staple Food and ii) Bus Transport, with support from the Department for International Development (DFID), UK and German Federal Ministry for Economic Cooperation and Development (BMZ) facilitated by *Deutsche Gesellschaft für Internationale Zusammenarbeit* (GIZ). The project commenced in November 2012 and was to be implemented over a period of three years till October 2015. In January 2015, the project received a no cost extension by donors till March 2016. The project is divided into three phases. A detailed note on the background of the project and its activity break up is provided.

In order to provide greater transparency to its work, increase efficiency and outreach of its projects and demonstrate accountability to its development partners and other important stakeholders, CUTS has put together a team of in-house Monitoring and Evaluation (M&E) experts. They have been tasked with an important agenda of independently monitoring the progress of projects and evaluating their impact.

This is a report on the internal mid-term evaluation of the CREW Project that was commissioned by CUTS to evaluate its progress after completion of the first phase. The scope of the evaluation was limited to Phase I of the project, hence, focusses mostly on the preparation of the Diagnostic Country Reports (DCRs) being an output of the project in this Phase. An evaluation of the outcomes and impact is not feasible at this stage. For now, it is being assumed that the project will be able to achieve its defined objectives and acquire the desired impact.

Phase I of the project was about the preparing of DCRs and as per the original project design, DCRs should have been finalised by October 2013. As the work for developing of DCRs progressed, the project and research team and the PAC realised that the structure and scope of DCRs require more efforts. Many changes were suggested by the PAC which were suitably incorporated by the project and research team. For various reasons, some of them are being mentioned in this summary and all of which have been elucidated in the Findings section. Moreover, the timeline for publishing DCRs was shifted to May 2014. These were eventually finalised in January 2015.

The project has been criticised for this delay by the donors. While on face value, the delay could not be denied; it is imperative to understand the reasons for delay and this is what the Evaluation team

has tried to focus on in key informant interviews. The possible reasons for the delay have been listed in the Findings section of the report.

Due to the delay in Phase I of the project CUTS requested the donors for a no cost extension of the project till March 2016, which has been accepted.

The Department for International Development (DFID) has also conducted their mid-term evaluation of the project and rated the project as 'B' for the year 2015 with the risk of rating being 'Medium'. At the beginning of their review, DFID stated that there were some trust-related issues with CUTS but these were immediately looked into and were efficiently addressed by the CREW team in Jaipur. As a result of this delay, the project has been put on a Performance Improvement Plan (PIP) by the DIFD.

By the time this report gets finalised the project would have completed Phase I successfully and DCRs would be published. The project has currently moved into Phase II which focusses on advocating recommendations based on the findings of the project that have been captured in the DCRs.

As stated above, the Evaluation process focussed on Phase I of the project involving making of DCRs. It was also found that there was a substantial delay in their completion. This section highlights some of the important plausible reasons for the delay.

An important deduction from the reasons for the delay points to the fact that the project does not encompass a comprehensive monitoring plan in place. The word 'comprehensive' here is, of great significance as it portrays that there the project monitoring system is in order but is not adequate to ensure smooth, time-bound delivery and monitoring of project-related activities. This shortcoming has also been identified by the evaluation conducted by the donors. As stated above, the DFID has placed the project on a PIP and it is highly recommended by the Evaluation team that this PIP should be accepted as the basic framework for developing a comprehensive monitoring plan for the rest of the project. If adopted efficiently, the Monitoring and Evaluation (M&E) team of CUTS will work with the project team to formulate a thorough monitoring design for the same.

This project – virtually the first of its kind in terms of scope that was defined for it – is seen as an extremely challenging one by all stakeholders. Considering that there has been no precedence of a similar project in the past, in terms of scope and eventual sectors that were chosen, there was also lack of knowledge about the composition and structure of DCRs. This led to structural enhancement of the DCRs, in the initial period as the PAC realised that the initial design would not meet anticipated outcomes. The entire process of making them better occurred within the time frame in which they were meant to be developed and delivered by the research team. It would have been

prudent for the project team to have assessed this immediately for reviewing the time frame within which the DCRs were to be developed. In the absence of which, the delay was regarded as a multifactorial delay in the production of the DCR.

The inherent design/manner of engaging the PAC and National Reference Group (NRG) is also being considered as a reason for the delay, especially by the researchers. The Evaluation team recognises the merits of having a PAC and a National Reference Group (NRG) for all key projects. However, it will be judicious for all project implementers to be mindful of the fact that PACs are meant only to provide an overall direction to the project and not to get into the minor details comprising whetting all the DCRs, as was the case of this project. Their role seems to have been diluted to editing all the DCRs instead of just defining the process of its preparation and commenting on the quality. They were being drawn into the minor details because the draft DCRs were being carried forward without much intervention by the Jaipur project team. Besides, all important documents were being sent to the PAC members for their review and seeking comments/suggestions. The entire process was found to be time-consuming by the end line researchers. Having said this, it was also found that the project team and the PAC members assessed this and the process was redesigned. Eventually, specific PAC members were selected to comment on particular DCRs, thereby reducing the need to collating and forwarding the feedback of all the PAC members to research teams.

The role of CUTS Institute for Regulation & Competition (CIRC) and the CREW team in Jaipur require close scrutiny during the progress of the project. CIRC was designated as a Country Partner but its role was substantially different from other country partners of the project. Whereas other country partners were managing all aspects of the project, including managing the research (along with the research partners) involved in Phase I, CIRC's role was only limited to conduct the NRG meetings. The other aspects of Phase I were then monitored by CUTS team in Jaipur, while the research work for India was done by Indicus Analytics. The Evaluation team believes that this led to extra work load on the CUTS team in Jaipur and could possibly have taken away their focus from the overall monitoring of the project. Though CIRC has played its role as per the expectations, CUTS might need to assess its future involvement in Phase II along with the role of CUTS' Jaipur team. Having said this, it is evident that the function of CIRC was designed the way so as to allow the Jaipur team to obtain hands on experience of the issues in the two specified sectors in India, so that they could better monitor/supervise the work of the other countries having the experience for the same.

Another important finding that needs to be highlighted is the fact that GIZ had considered pulling the plug on the project at one stage when it was discovered that the international travel expenditure had risen substantially. Moreover, the senior staff of the organisation had been travelling to various global platforms to talk about the project and therefore, the charge was being passed onto the project. However, these platforms were not necessarily a part of the project and external to it. It was

then decided that CUTS would charge only a portion of that cost to the project once it provide evidence that the project was being highlighted on these platforms. These concerns were raised by GIZ and fully addressed by CUTS and a consensus was arrived at.

Multiple personnel changes in DFID at the nodal officer level seem to have an impact on the scope of work. Thomas Ratsakatika, current Nodal Officer for the CREW project (in DIFD) views that interruptions were caused by changing of DFID representatives constantly and this could be one of the causes of slip in monitoring the scope of the project. Furthermore, had there been a single person looking after the project, it might have been possible to assess that the scope defined for the project was extensive and quite challenging. Furthermore, selection of two sectors for the study should have been curtailed to one. The representatives might also have had a say in the chosen sectors, especially when the availability of the baseline data was inadequate and turned out difficult and demanded much time from the researchers to scope for the data.

Many positive aspects were also highlighted by stakeholders that were interviewed. The overall reaction of stakeholders, especially of the donors and PAC members towards the project was positive. Despite the unavoidable delays, they still believe that the project will achieve its desired outcomes in due course of time. Moreover, the donors have categorically expressed their immense faith in CUTS and strongly believe that Phase II will be much better than Phase I as advocacy (which is CUTS' strength) will be conducted.

It has also been noted that the CUTS' team has already initiated work on the Advocacy Phase by presenting the project on various platforms designed specifically to develop a pathway for accomplishing the desired goals and objectives.

In addition, work on the second defined target of the project – Synthesis Report and Framework for Competition Reforms (FCR) has also commenced.

Background Information

The process of competition enforcement has been fairly weak across many developing countries, and needs to be strengthened to ensure that competition reforms lead to measurable and demonstrable welfare gains. Developing and least developed countries (LDCs) are facing resource constraints, and policy makers need to make difficult choices/decisions while allocating scarce resources for the various functions. For resources to be made available to undertake competition reforms in developing countries, it is necessary that benefits from competitive markets on consumers and producers are properly demonstrated to policymakers (and development partners as well). However, there is lack of a comprehensive approach for measuring such benefits.

Over the last 15 years or so, CUTS has amassed considerable ground-level experience of implementing competition policy projects in nearly 30 countries of Africa and Asia. It is this experience and contact with experts, practitioners and other stakeholders that motivated CUTS to address the above challenge through. Pursuing this goal, CUTS developed a project entitled, *Competition Reforms in Key Markets for Enhancing Social and Economic Welfare in Developing Countries (CREW project)*, and initiated its implementation since November 2012 with support from DFID, UK and BMZ, Germany through GIZ, Germany. This project, to be implemented, over a period of three years across four developing/LDCs, is expected to lead the development of approach(es) that would help developing country policy makers better understand the benefits of competition reforms for consumers and producers.

CUTS envisages that the project would be implemented in three distinct Phases:

- The first Phase would be dedicated to reviewing existing literature and identifying key indicators that can help assess the impact of competition reforms on consumers and producers. Certain enabling factors would also be identified in this phase. A clear output of this phase would be DCRs.
- In the second Phase, CUTS in cooperation with experienced international organisations would develop frameworks for competition promotion (an approach to promote competition in select developing country markets and assess their impacts on consumers and producers).
- Finally, in the third Phase, this approach would be validated by applying it in micro-locations in the selected developing countries, for fine tuning and finalisation.

The primary goal of the project is to better demonstrate the assessable benefits for fostering country consumers and producers from an effective competition policy and law regime, for ensuring long-term support for competition reforms.

Objectives

The objectives of the project are to:

- Enhance international realisation of the benefits from and the best practices in effectively implementing competition regimes in developing countries
- Develop and examine a methodology (with indicators) for assessing the efficacy of competition regimes in acquiring impacts on developing country consumers and producers
- Advocating for a greater magnitude to competition policy and law issues in the national development agenda to national and international stakeholders and
- Sustain the momentum on fast-tracking competition reforms, attained from stakeholder awareness, understanding about the benefits of the same and effective participation in related processes in developing countries.

In the process, certain outputs would be generated to realise the ultimate outcome as enumerated below:

Benefits

- Documenting the evidences of social and economic benefits from competitive markets
- Discussing and having dialogues and with and among the multiple stakeholders on the benefits from competitive markets
- Making Strategy for capacity building of competition agencies and/or sectoral regulators in developing countries on competition enforcement
- Developing a framework that guides the process of competition reforms in key markets and help measure the impacts thereof and
- Generating demand from other (non-project) countries and markets to consider the lessons learnt.

Outcome

Greater attention and impetus for competition reforms in key markets of developing countries, resulting in enormous benefits for consumers and producers.

Countries and Sectors

The CREW project is being implemented in four countries: India, The Philippines, Zambia and Ghana. The project is observing two sectors: Staple Food and Passenger Transport.

Consumer and Producer Welfare in the two specified sectors (Staple Food and Passenger Transport) are defined in the matrix below:

	Staple Food	Passenger Transport
Consumer Welfare	Availability of quality Staple Food at reasonable prices for ordinary consumers	Availability of excellent transport services to common consumers at reasonable prices within the city (intra-city) to get to workplace, markets, colleges/universities, on a daily basis including busy inter-city routes
Producer Welfare	<ul style="list-style-type: none"> • Participation of private entities in procurement, storage and distribution of Staple Food and how they acquire benefits and • Reasonable prices and fair terms for producers (and their groups) in: both input and output markets 	<ul style="list-style-type: none"> • Ease of entry of 'new players' (operators) in a specific geographic market for providing such services and • Fare and terms of services in case of inter-city transport services for small traders travelling to nearest market in the town to sell their produce

Evaluation Methodology

Before the report proceeds to the summation, it is important to understand the methodology that was adopted in conducting this mid-term evaluation and reasons for its adoption. The methodology followed was as given below:

The CREW Project did not require the Mid-term Evaluation (MTE) to be quantitative or population-based. Participatory qualitative methods of MTE were implemented because the project was not working on/with quantifiable outputs except the production of the four DCRs. The internal evaluation has reviewed the available quantitative information that is being generated by the M&E and Financial Management Information System (MIS) of the programme to substantiate main findings and for learning and evidence-based decision making.

Based on this, the following tools were used:

- **Key informant interviews** based on detailed open ended questions:
 - The list of **Key Informants** is attached as **Annexure I**
 - A **Sample Questionnaire** is attached as **Annexure II**
 - A transcript of the **Interview** held with Thomas Ratsakatika, Nodal Officer for the project in DFID has been attached as **Annexure III**
- **Timeline analysis** image is attached as **Annexure IV** and
- **Document Reviews** to collect data from multiple sources

This MTE has mainly adopted a participatory qualitative study approach that involved the following key stakeholders:

1. The PAC members
2. The entire managerial staff of CREW project team of Jaipur
3. Representatives of the implementing country partners and
4. Representatives of research partners

Findings

1. Phase I of the project was about the production of DCRs. As per the original project design (as shown in the image of the Timeline analysis, Annexure IV) DCRs were to have been completed by October 2013, however, for various reasons this timeline was postponed to May 2014 (evidence for which is available in the emails sent to the donors and PAC).
2. It has been observed that despite the agreed shift in the timeline there was a further delay in the completion of DCRs and these were eventually completed in January 2015. Despite the agreement to redefine the deadline to May 2014, this is still a substantial delay by any standards and the project has been criticised. Furthermore, it is imperative to understand reasons for the delay and this is what the Evaluation team tried to focus on in the key informant interviews. The possible reasons for the delay have been listed below. This section of the findings shows the current status DCRs that have been completed and uploaded on to the CREW web page.
3. The delay in Phase I of the project has led to CUTS' urging the donors for a no cost extension for the project till March 2016 which has been agreed to. As a result of this delay, the project has been put on a PIP by the DIFD.
4. Perceived reasons for the delay are given below:
 - i. An important deduction from reasons for delay points to the fact that the project lacked a comprehensive monitoring plan in order. The important word here is '**comprehensive**', which reflects that there is a project monitoring system in place encompassing monthly Skype calls with the donors, internal meetings with the Management group and quarterly progress update emails to PAC members but is not thorough to ensure smooth, time-bound activities and effective monitoring of the project-related activities. This gap has also been identified by the evaluation conducted by the donors.

While an evaluation has been planned and budgeted for the end of the programme, **a robust progress monitoring plan with clear timeline was not put in place**. For now, it is highly recommended that the PIP provided by the DFID be accepted as the basic framework for developing a detailed monitoring plan for the rest of the project. If adopted, the M&E team in CUTS will work with the project team to develop it further to customise it to their capabilities while being mindful of timelines and this will be shared with all stakeholders. This project is virtually the first of its kind in terms of the scope that was defined for it, is seen as an extremely challenging one by all stakeholders. Considering that there has been no precedence of a similar project, in the past, in terms of the scope and eventual sectors that were chosen, there was lack of knowledge about the composition and structure of DCRs. This lack of knowledge forced the refinement of

composition and structure of DCRs in the initial period as the PAC felt that the original design would not meet requirements.

The DCRs were meant to have been produced by October 2013 and eventually completed by January 2015. However, the delay is being assessed from May 2014 onwards considering that there was an agreement to re-scheduling the original timeline for their production to May 2014. Developing the DCR was a consultative process. The entire process of refining the DCRs was done within the time frame in which it was meant to be developed and delivered by the research team. It would have been prudent for the Project team to have assessed this immediately to seek a review of the time frame within which DCRs were to be prepared. In the absence of which, the delay was viewed as a composite delay in the production of DCRs. The conceptualisation of the reports consumed much time than required.

- ii. The inherent design/manner of engaging the PAC and NRG is also being seen as a reason for delays, especially by the researchers. All documents were sent to PAC members for their review and inviting comments/suggestions. The entire process has been time consuming and another reason for the delay resulting into substantial loss of time. However, the project team and the PAC members realised this fact soon and the process was redesigned. Specific PAC members were selected to comment on particular DCRs thereby reducing the need to collating and forwarding the feedback of all the PAC members to research teams. Besides, CUTS might have to consider reviewing this design as it seems to add up to a long chain of command.
- iii. One of the main criticisms of CUTS during Phase I about its project management ability and its inability to control the delay as it occurred. On the face of it, the delays do point to a minor failure on the management of project deadlines and keeping all stakeholders informed of re-scheduling timelines. However, some of the reasons mentioned in the list below provide few other deferment causes. In terms of management structures and team dynamics, it is clear that the CUTS' team put a lot of thought into developing framework and processes to manage the project. There is a clear demarcation of the roles and responsibilities within the team and across the board so attributing the delays to the shortcomings in project management might not be a comprehensive assessment. Besides, there are other important reasons for delays (that have been mentioned in the list below) which will require a close examination by the project team. The team has been urged to be open to accept those reasons and work on enhancing the overall functioning.

- iv. An important deduction which could be linked to PAC members' criticism about the project management ability of CUTS team is that while CIRC was designated as a Country Partner, its role was substantially different from other country partners. While other Country Partners were managing all aspects of the project, including managing the research (along with their respective research partners) of Phase I, CIRC's role was limited to conducting NRG meetings. Other aspects of the India work in Phase (except research work that was being done by Indicus Analytics) were being directly managed by the CUTS Jaipur team. The Evaluation team believes that this might have posed an additional work load on them and could possibly have taken away their focus from the overall monitoring of the project. The reason for designing the roles in this manner seems to have been to allow the Jaipur team to have experiential learning by being involved in the process DCR production process, so that they could monitor the work of the other Country Partners with better first-hand knowledge. But the collective delay arising out of the various reasons mentioned in this report got them deeply involved in the production of the India DCR thus keeping them from effective monitoring of the other DCRs. Though CIRC has played its role as expected, CUTS might need to assess its future involvement in Phase II along with the role of the CUTS' team in Jaipur. CUTS will have to ensure that the role of the CREW project team in Jaipur is also determined to ensure maximum efficiency in providing relevant technical inputs in the overall monitoring of the project.
- v. One of the challenges raised by the PAC members who were interviewed was that most of the times, documents meant for review were passed onto them without any or quality content or editing of the same. This could be attributed to the team in Jaipur not having adequate time to do so because they were involved in the delivery and production of the India DCR or merely acting as carriers for other DCRs.
- vi. Through the review it was clear that Zambia was the weakest partner in the production of DCR and The Philippines was the strongest. The feedback received from the key informants strongly suggested that The Philippines was in fact a model of efficiency and emerged as the strongest partner in the project. Their responses and inputs were timely and met high quality standards. Zambia, on the other hand, faced various challenges starting from the selection of the Research Partners and Researchers in the nascent stage itself. Zambia Institute for Policy Analysis & Research (ZIPAR) had expressed interest in the work being done under the project and it was decided that ZIPAR would be included as an adviser.

Moreover, ZIPAR was supposed to review and provide inputs on the research deliverables being produced by independent consultants contracted by CUTS Lusaka. Despite heavy scoping for the Researchers, CUTS Lusaka was not able to find a suitable researcher. ZIPAR eventually proposed a researcher, Tembo, Head, Department of Agriculture, University of Zambia, at that time. Tembo participated in the NRG meeting but he denied being associated with the project at the time of signing the contract. CUTS Lusaka then approached another Think Tank (IATRI) who was willing to work on the 'Staple Food' report but the contract could not be signed with them either.

ZIPAR then recommended another researcher for the 'Transport Sector', Robert Mtonga. However, despite the faith that the team in Jaipur and CUTS Lusaka put in him, he did not deliver accordingly as he could not work with the central framework that was provided to him by CUTS Lusaka team. He was also affected by the time that was lost in getting feedback from the PAC. It seems that because of a combination of these reasons he lost interest in the project and was not motivated enough to produce the kind of quality outputs that were expected. He did put some data together though. CUTS Lusaka was then compelled to look for another researcher. The time that was lost in the process substantial delay in the production of the DCR. The research work was eventually handed over to Cornelius Dube who worked with the local team to produce a satisfactory report, using inputs from the 'sector experts'. Cornelius Dube had been associated with the project from the beginning and as integral part of the project team. The section on Staple Food was written by other consultants.

- vii. Another important finding that needs to be highlighted is the fact that GIZ had considered pulling the plug on the project at a stage when it was found that there has been a substantial and unreasonable hike in the international travel expenditure. Although these concerns were valid but CUTS did provided explanations for the same. This was that the travel aspect was linked indirectly with the project. In addition, the senior staff of the organisation had been travelling to the various global podiums to discuss about the project and therefore the fares were being passed onto it. However, such platforms were not an essential part of the project and were to be done externally. It was then decided that CUTS would charge only a fraction of that cost of the project once it provided the evidence that the project was being underlined on such platforms or guidelines. These concerns were raised effectively by GIZ and were fully addressed by CUTS and a consensus was arrived at and evidence of the same has been reviewed.

Reasons for Delay in Completing Phase I

The following reasons can be attributed to the overall delay:

1. All stakeholders especially, donors and the PAC suggest that CREW is a very ambitious project. However, its scope should have been restricted to one sector only.
2. The selection of sectors that were eventually chosen may also have caused the delay as exploring competition policy related issues by itself is a relatively new topic in these sectors. Once the research work started it was discovered that some countries had limited and/or scattered data to work with. As a result of which new data mining tools and methodologies had to be worked out, this took time. Researchers must have been lacking requisite tools initially.
3. Multiple personnel changes in DFID at the nodal officer level might have affected the scope of work. Thomas Ratsakatika, the current nodal officer for the CREW project opines that the gaps caused by constant changing of DFID representatives could have led to a slip in monitoring the scope of the project.
4. The development of DCRs was organic and developed as the understanding of the PAC, CREW Team and Researchers. This has resulted in the development of a 'Methodology' template – which could be applied to other sectors. Hence, future CREW-inspired projects would be less cumbersome, research wise.
5. The requirements from the DCR were being refined within the time frame that was set aside for developing the same. The consultative and refinement process consumed the research and development process.
6. Suggestions of the PAC were sought within this timeframe leading to many alterations in the structure and scope of the DCRs.
7. The selection of the implementation and research partner in Zambia was not fair enough resulting into a great delay in the production of their DCRs. A Researcher (Bus Transport) was changed and the responsibility handed over to Cornelius Dube.
8. All advisers were supposed to comment on each and every report drafted by all the participants involved in the process. This led to a lot of duplication and motivational issues even for the PAC members.
9. In addition, there was a loss in time and the Researchers, especially in Zambia lost their interest in the project. As the researchers were not regular employees but were appointed on contractual basis and realising the value of time they decided to move away from a time-consuming project.
10. A PAC member also suggested that one of the objectives could have been to have a model outline as to how to conduct such a research. This validates the point that the consultative process of conducting the research and developing the DCR should have been kept separate from the time frame for producing the DCRs.

11. Initially, it was decided that each sector would have its own DCR and then later on it was decided to club them. The implementation of this decision consumed much time leading into delays
12. The overall system of passing everything through the PAC and NRG resulted into further delays.
13. CUTS' overall role has also been questioned. At times, material which was passed onto the PAC without their intervention and quality checks. Their intervention was required to make the DCRs much stronger and relevant to which countries?
14. Proper instructions and guidelines writing should have been given to all members involved in the production of the DCRs and
15. More reasons could be deduced from the advantages and challenges provided in Annexure V.

Many convincing facts were also highlighted by the stakeholders that were interviewed. Though a long list of merits and challenges faced has been specified in **Annexure V**, the following aspects must be mentioned here:

- i. The overall response of the stakeholders, especially of donors and PAC members towards the project remains positive. Despite the delays, they still believe that the project will achieve its desired outcomes eventually. They have been commending the efforts and commitment of the CREW team in Jaipur along with the project teams in other three countries. They strongly believe that CUTS team in Jaipur is highly dedicated towards the project and will continue to add value to the same in future as well. Likewise, donors have categorically expressed their immense faith in CUTS and believe that Phase II will be much better than Phase I because it encompasses advocacy which is CUTS' incredible strength. A thorough monitoring plan along with the commitment of the team members will lead to the achievement of the overall goals of the project within the timelines specified in the PIP.
- ii. Assigning PAC members to countries was perceived to be a good idea as they could then focus on those countries only thereby reducing the time taken for collation of all views. This increased the efficiency of the DCR review process
- iii. The following examples verify the fact that CUTS team has already initiated work on the advocacy phase by presenting the project on various platforms specifically to develop the pathway for achieving the desired outcomes (evidence of which is available on records). The examples given below reiterate the sentiment of donors and the PAC that CUTS will be executing in the second phase.
- iv. Institute of Economic Affairs, Kenya and United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP) have expressed interest in the CREW methodology. Besides, CUTS has already written to them for the same and is ensuring regular follow up. More comprehensive follow up would further be undertaken once the DCRs have been finalised and focus is entirely shifted to advocacy.

v. Few relevant examples of success accomplished in outreach till date are mentioned below;

- **India:** CUTS had undertaken stakeholder meetings in the project states in India. Entry points have been created in the governments of Gujarat and Madhya Pradesh to collect some of the findings from the 'Bus Transport' sector. In February 2015, the CREW Jaipur team made a presentation in front of the Chief Secretary, Madhya Pradesh and Principal Secretary and Department of Transport, Madhya Pradesh focussing on the need for having an intercity Public Transport Regulator. Similar leads have been developed for the Government of Bihar for findings from 'Wheat' sector study.
- **The Philippines:** Advocacy meetings/interactions are planned with relevant Senate Committees to take up the research findings during the upcoming NRG visit. Further, CUTS is closely working with the Office for Competition (OFC) in *the Philippines*. In November 2014, the OFC and CUTS jointly held an Advocacy Forum to discuss the CREW transport findings.
- **Zambia:** A project on the sugarcane sector has been undertaken by project partners in Zambia. Discussions are already underway to replicate CREW methodology in this sector. Further, the Ministry of Transport (MoT) of Zambia has welcomed the project report indicating that it is timely and quite relevant. The Director, MoT wants to conduct a meeting of key stakeholders in the sector by the end of March/April to brainstorm on how some of the issues raised in the report could be taken forward. The Competition and Consumer Protection Commission (CCPC), Zambia has sent a letter that highlights the relevance of the CREW project and suggests the way forward for taking the findings of the report.
- **Ghana:** Through the evidence being generated by the research, pressure is being built on the Government of Ghana for adopting a National Competition Regime. The Minister of Trade and Industry had called CUTS in March 2015 to submit an *Expression of Interest* for drafting the Competition Policy for Ghana.
- **World Bank (WB)** had invited CUTS to speak at a roundtable discussion on 'Competition Advocacy' as a part of the WB Annual Meetings that was held in Washington on October 11, 2014 (and supported the cost of travel, accommodation). CUTS had specifically been asked to give an insight of the CREW project, pilot countries' results and the role of civil society in advocating for Competition.

vi. The International Conference held in Bangkok from November 18-19, 2014 was an outreach event designed to spread awareness of the CREW methodology to all stakeholders, academia and policy makers across the world, especially from the intervention countries. The conference has been highly praised by all stakeholders. Apart from the dissemination of the project findings amongst various international practitioners on competition, the conference also proved to be an excellent platform for discussions pertaining to the project outreach and further uptake.

- vii. Work on the second planned output of the project which is the Synthesis Report and the FCR has also commenced. As had been agreed with DFID, CUTS had prepared a 'Guidance Note on FCR' and has been shared with DFID and GIZ. The note covers the rationale and experiences leading to the development of DCR.

The challenging aspect of the CUTS endeavour might well be over. All stakeholders are of the opinion that CUTS will do extremely well in the second phase of the undertaking.

Financial Review

The financial review was not detailed or forensic in nature. The main reason for this was that CUTS has been submitting quarterly reports to donors since the inception of the project and which have received their approval. The assumption of the reports having received the nod of donors is based on the fact that agreements with donors clearly state that funds will be released only after the submission and acceptance of quarterly reports and since CUTS has been receiving tranches of the grant as per the disbursement cycle it is assumed that reports have been accepted. However, the following points have been assessed from the review that was conducted:

1. Reports that are submitted to donors are in compliance with their requirements
2. Reports are submitted timely on a quarterly basis. Evidence available in the form of emails and had been reviewed
3. The overall project budget has been reviewed on two occasions – since inception and original agreement, i.e. once in September 2014 and again in February 2015. The **final approved budget** is attached as **Annexure VI**
4. ₹28,00,000 which is equivalent to £30,000 approximately, had been allocated to the project budget for conducting an external end of term evaluation of the project. This amount has been removed from the approved project budget but will still remain allocated. DFID will be incurring this cost directly for the external evaluation of the project. The total project value stands at ₹9,77,47,399 (Rupees Nine Crore Seventy Seven Lakhs Forty Seven Thousand Three Hundred and Ninety Nine only)
5. The reduced amount will be utilised by DFID for the evaluation of the project. By taking it back they commit to spending this amount on the Evaluation themselves
6. The expenditure recorded and reported till January 2015 is ₹ 5,77,51,100 (Rupees Five Crore Seventy Seven Lakhs Fifty One Thousand One Hundred only) which equates to 51 percentage spend against the total budget. This can be seen from the report attached as Annexure VI
7. The remainder of the budget has been linked to activities till March 2016 and it is assumed that the entire amount will be spent. Expenditure report and spending plan can be seen in Annexure VII
8. During interviews with donors, they did not raise any objections or concerns relating to the management, reporting or utilisation of funds except for only one instance that was brought up by GIZ. This concern has been mentioned in the findings section. The matter was brought to CUTS' notice and resolved to the satisfaction of donors.
9. In the assessment of funds that are due to CUTS from DFID, it was noticed that CUTS will stand to gain excess money in INR owing to the exchange rate variation. This gain will be to the tune of ₹7,546,035. This variation is within the overall commitment made by DFID (£ 8,85,000. Original sanction of £9,915,000-£ 30,000) and has been pro-actively highlighted to CUTS and DFID are willing to allow it to utilise it for the benefit of the project. CUTS has

submitted a proposal to DFID to use this money for organising an International Conference and for personnel expenditures. The proposal was pending for approval at the time of carrying out this evaluation but has been approved as on date.

Recommendations

1. The project needs a comprehensive monitoring plan and tool. This tool should be designed such that it keeps the onus of monitoring the programme on the CUTS team and reduces the role of the PAC in areas where there intervention is not necessarily required.
2. It is recommended that the PIP developed by Thomas Ratsakatika, Nodal Officer in DFID, be adopted as a framework for developing a comprehensive monitoring plan for the project. If it is considered for adoption, then the M&E team will work with the project team to improve and customise it and to redefine timelines if necessary and then work with them to monitor progress against it.
3. As such Tom has asked for a responsibility chart to be prepared by Rijit and he must ensure that work is delegated so that Rijit can spend more time on technical matters. He also suggested that we need to work out who we are paying for and if we can restructure time allocation. DFID would not want staff spending so much time on the project. DFID sees it as a key risk because it sense that the current team may be overworked which may lead to a burn out thereby affecting the efficient implementation of the project.
4. CUTS' central team must play a bigger role on the technical inputs front. A lot of things were passed onto the PAC and at times without any intervention. This has led to time delays and frustrations at country- and researcher-level.
5. The inherent design of the project where the PAC is expected to whet everything seems to be causing harm to the project by being a cause for delays. This definitely needs to be reviewed. The role of the PAC needs to be revisited and streamlined. The CREW team in Jaipur suggested that this has been approved by DFID so they take everything to the PAC. DIFD's approval does not automatically mean that it is a model that is efficient. We will have to review the chain of command and the check points in the process.
6. In future, CUTS should pro-actively ensure that it provides a comprehensive update to a new Donor representative as every time a new person takes over and not depend on the Donor organisations' handover process. This will help establishing trust among stakeholders by showing CUTS as being proactive and a step ahead.
7. Similarly, DFID is also requested to closely look at their handover process to ensure that the knowledge transfer is comprehensive in such cases. May be both CUTS and DFID need to agree that a more formal intervention is required in times like these.
8. CUTS team to work on communication. It needs to be consistent, strategic and timely. Especially now, when the next phase is to begin. They should consider creating a platform where the next steps and the plan for implementation are developed in consultation with all partners and donors and are then presented back to them once complete. A workshop could be planned for this purpose. This workshop could be used to finalise the monitoring plan and reassess the roles of all stakeholders.

9. Going forward, CUTS needs to think hard about how we will present the DCRs and other outputs to a wide and multicultural audience. Two PAC members strongly felt that CUTS needs to assess how good the DCRs are / will be in influencing policy makers. This assessment could be done while producing the Synthesis Report.
10. CREW team should also start thinking about the evaluation of the project at this stage.

Annexure I: List of Key Informants

S. No.	Category / Name	Designation	Organisation
Country Partners			
1	Simon Ng'ona	Centre Coordinator	CUTS International
2	Appiah Kusi Adomako	Centre Coordinator	CUTS International
Research Partner			
1	Jincy E Francis	Economist	Nathan India
2	Kristen Harkins	Managing Associate	Nathan Associates
3	Abhijit Sarkar	Senior Economist/Vice President	Indicus Analytics
PAC			
1	Tania Begazo	Competition Consultant	Competition Policy Team, Investment Climate, World Bank
2	Owen Gabbitas	Research Manager	Productivity Commission, Australia
3	Eberhard Feess	Professor of Managerial Economics	Frankfurt School of Finance & Management
Donors			
1	Thomas Ratsakatika	Private Sector Development Adviser	DFID
2	Eiko Kauffman	SV Sustainable Economic Development Consultant	German Society for International Cooperation (GIZ) GmbH
Jaipur Team			
1	Rijit Sengupta	Regional Director, Africa	CUTS International
2	Neha Tomar	Research Associate	CUTS International
3	Shreya Kaushik	Programme Officer	CUTS International
4	G C Jain	Associate Director, Finance & Administration	CUTS International

Total: 14

Annexure II: Sample Key Informant Interview Questionnaire

Development Partners' role, DFID

- Providing required guidance by the PAC members to the process of project implementation;
- Proposing names of PAC members;
- Involvement in the 'Internal Review' of the project activities, which would be undertaken at the end of each of the first two phases ;
- Participating closely in the process of conducting the 'external evaluation', given their relative advantage of undertaking such evaluations (as compared to CUTS);
- Approving funding subject to a satisfactory level of progress. In addition, to remain in close contact with CUTS' team for reviewing the progress of the project periodically (both on the programmatic/substantive issues and financial matters also);
- Involving their country offices in the project, so that the lessons could be emulated in other markets;
- Maintaining a mechanism for coordination with other donors, in-terms of their interactions with CUTS, reporting period/requirements, etc. and
- Making efforts to elicit interest among other (relevant) donors in project.

Thomas Ratsakatika's Role

- Private Sector Development Adviser
- Nodal Person in DFID for CREW Project and
- Reports to Tim Green, who reports to Adrian

Sample Questions

1. When have you been involved with this project?
2. Is the understanding of the role clear on either side?
3. Do you think CUTS team in Jaipur is clear about its role within the project?
4. Who all have you worked with in Jaipur Office?
5. Who else have you been in touch with from the larger project community – PAC members, National stakeholders, Competition Authority/Ministry officials? How has this been accomplished? How has it helped you?
6. What is the reporting mechanism incorporated in the project management process of DFID that helps it keep track of the project progress *vis-à-vis* expected outcomes? How often has this been mechanism been employed?
7. What are the objectives of the project?
8. Have the objectives been achieved?
9. Were they achieved on time?

10. What is the overall understanding at DIFD's end?
11. What are your expectations from the project (A two-page document outlined by Rijit)?
 - What is the need for this document?
 - How does it meet your requirement?
12. Log frame:
 - Changes in the log frame. Have they been tracked? To check variance if at all
 - Are you/CUTS' clear about the transposition of objectives into a log frame?
 - How will DIFD or you assess CUTS on additional achievements and outcome indicators?
13. What have been the advantages and challenges so far?
14. What is the next set of deliverables or what are the steps to be taken next? Including the PIP (M&E plan and how I can as an M&E resource person assist in the PIP and overall delivery, according to you?)
15. Is there a clear understanding of when the next phase will begin?
16. What has been your experience of working with the Jaipur team?
17. Were they responsive? What role did the Jaipur team play in facilitating your work with the other players involved?
18. What strengths and weaknesses would you like to highlight of the project team/organisation/Africa team?
19. What is the process of handover within DFID?
20. Has CUTS engaged with the new incumbent every time there has been a change?
21. What do you know about the current state of the project?
22. What is your opinion on the project, as a whole? A subjective view based not only on your immediate understanding of the project but also drawing conclusions from its history?

Riders

1. This is an indicative list prepared on the basis of the understanding of what role is expected from DIFD and its representatives. This does not mean that the discussion would be limited to these questions only
2. Some of the questions are very basic
3. This is an independent evaluation and I come to the table with clean slate
4. I will be taking notes so that I can stop you or request you to go slowly and
5. I might have to come back to you later

Annexure III: Sample Transcript of Key Informant's Interview¹

CREW Mid-term Evaluation Key Informant Interview

Call with Thomas Ratsakatika (Tom), DFID, UK on January 28, 2015

Tom's Role in DFID: He is a part of The Investment Climate Team; Business Environment Competition, Policy Work, Advice on Market Systems etc. He is in charge of CREW and other programme with World Bank. His role is akin to Eiko Kauffman's, SV Sustainable Economic Development, Consultant, GIZ role.

CREW should form about 15 percent of his role but is taking disproportionately more of his time relative to other programmes he manages, largely due to unique programme management issues (*significant delays in delivering DCRs, issues with travel expenses, the implementation of a PIP*). Tom has been involved with the CREW project since September 2014. According to him, CUTS is clear about his role but there might be slight miscommunication. He feels he should be talking more to project partners for assessment. Thus far, he has spoken to and consulted PAC members especially in International Conference held in Bangkok on November 18-19, 2014 and has not been able to build in time to speak with others.

DFID's review of the project will start next month and he said that he would like to schedule calls with the project partners. Amit will be sending him the list of all key contacts that he will be speaking with as part of his evaluation. Another thing that is being considered for Tom is to travel to the project site/countries. He informed that Tim Green is going to Zambia so DFID will try and link him with partners.

Correctly or not so correctly, perhaps moving of the DFID representative (DFID started with Roger, then Tim came in and then eventually been assigned the project) could have affected the scope of the project by not being able to reign in the change in scope. Given that the scope was increasing we could have scaled it down. Sectors could have been reduced. When he became a part of the project Tim sent an email introducing him. Tom sat in for the first monthly call and then Tim stepped away. Tom has been building his knowledge base by asking questions ever since. There was no introductory or handover call from the team explaining the history and present scenario of the project. There was a few months' gap between leaving of Miguel and joining of Tim. Tom is not sure of what happened within that time period.

¹ This transcript has been reviewed and approved by Thomas Ratsakatika

Reason for the change in plans could not be attributed to CUTS' lacking in technical skills but raises question on its management ability. Therefore, changes are required urgently required.

Tom spoke about the objectives of the project and stated that:

- Two-page document sent by Rijit was very useful
- Anti-competitive practices: Cartel wheat producers colluding to increase practices
- Policies were being explored not necessarily competitive practices. So initially efforts were made to find evidence of a cartel acting in the wheat sector (for example) which if broken up could produce X amount of benefit. The focus instead has been on policy and regulation, rather than business practices, which is good. Just an initial misunderstanding
- It is a broad sectoral study and has become a lot broader and more technical than originally envisaged, whether rightly or imperfectly
- DCRs should prove to be quite useful
- FCR draft sent earlier specifies what to do; instead it should mention about how to do and
- The objective of the FCR outputs was not specified initially. The two-page document will however serve the purpose.

The Annual review template has been laid out. Tom will be sending the template to Amit to enable CUTS to understand the ratings. Rating 'A' signifies meeting expectations and 'C' denotes not meeting the requirements, so as per the current status CREW 'B'. Personally, Tom finds A, B, C does not show the complete picture as it is moving backwards and is not considering risk factor.

CREW has been put on PIP. DIFD is in favour of continuing with the project. Amit mentions that the PIP should be considered as a monitoring tool and he would encourage CUTS' team to adopt the same as an effective means for the rest of the project. As such, Amit perceives that the project lacks a proper M&E plan. If the PIP is adopted as a monitoring plan for the project then Amit will work with the CUTS' team to enhance and customise it to redefine timelines, if necessary, and then work with them to monitor the progress against the same.

Strengths/Positives

CUTS possesses the below mentioned strengths, according to Amit

- CUTS is exceptionally good at getting people around the table
- The organisation realises the right people to speak to. So he is confident of advocacy side of CUTS
- The conference organised was found to be very well organised
- Full Involvement of efficient stakeholders
- Dedicated team which was committed to the project

- As there is a good level of buy in with the country partners the project will acquire new heights
- Advocacy activities would further be boosted and CUTS will be determined to take the task forward
- Project is visualised getting an A-grade and will do well in near future and
- There is always a room for improvement and a fair chance for betterment

Concerns

- According to Tom, we need to be sure of what we are the advocacy subject should be ensured and for this DCRs ought to be complete and proper in all respects
- Tom was astounded for the chosen two sectors, i.e. Staple food and Bus transport as these sectors are quite intricate for the four countries – India, The Philippines, Ghana and Zambia. He was of the impression that CUTS might have researched in these areas. He prefers to discuss such issues and
- He was disappointed with the project management side of the project as it could have been handled better

Way Forward

- Tom stated that the next set of deliverables are the National Advocacy Plans and FCRs
- Duty matrix to be prepared by Rijit and he must ensure that work is delegated in such a manner, so that he can give more time on technical matters
- Need to work out who we are paying for, can we restructure time? We do not want people spending so much time on the project. He sees it as a key risk
- Project evaluation budget has been increased from £21k to £30k to allow two in country visits. It would be commissioned by DFID and taken off CREW's budget and
- CREW team should also start thinking about the evaluation of the project, at present

Action Points

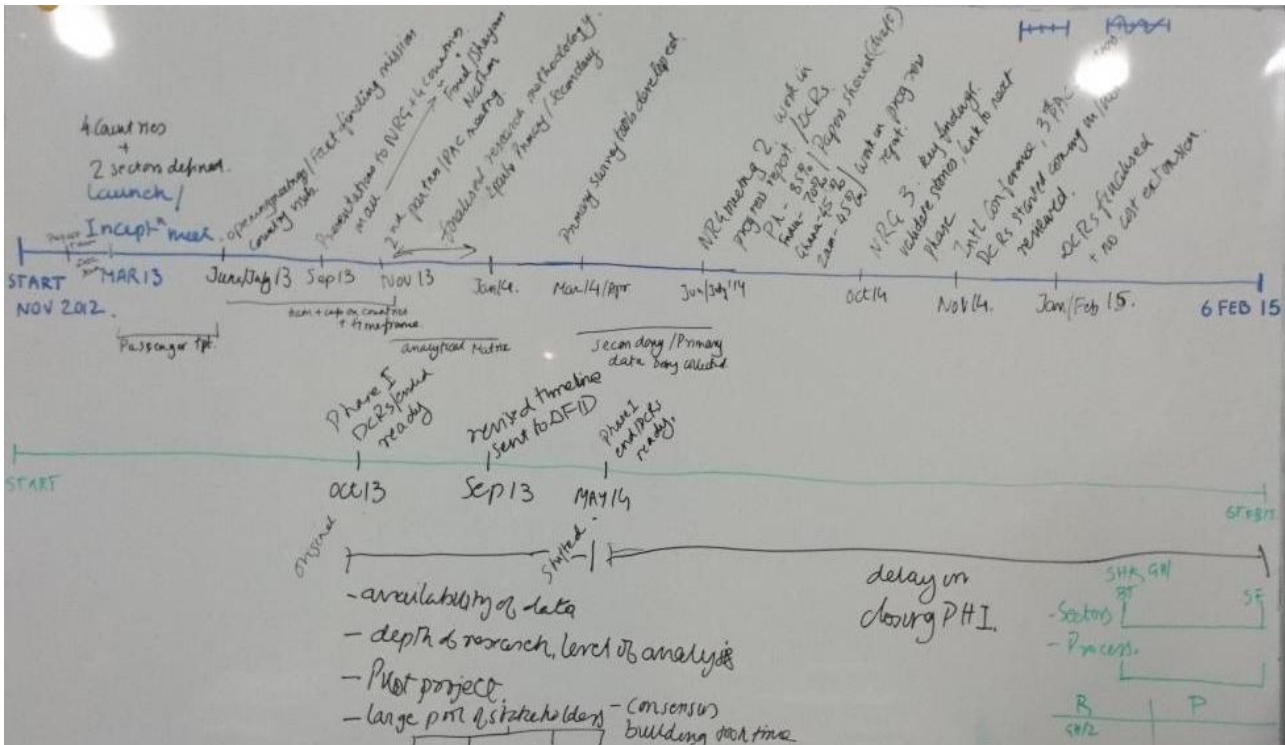
1. Amit to send Tom a list of all the key contacts that he will be speaking with as part of his evaluation
2. Amit to send Tom a draft of his evaluation report by February 16, 2015 or alternatively Tom could ask him questions when he begins his assessment
3. Tom to send Amit the Annual Review template to help CUTS understand the ratings
4. Amit to consider recommending adoption of the PIP as the monitoring plan for the project. If it is adopted then Amit will be working with the CUTS' team to improve and customise it to redefine timelines, if necessary, and then work along with them to monitor the progress of the same

Recommendations by Amit

- Amit recommends adoption of the PIP as the monitoring plan for the project. If it is adopted then Amit will be working with the CUTS team to improve and customise it to redefine timelines, if necessary, and then work with them to monitor progress against it and
- CUTS should pro-actively ensure that it provides a formal presentation to a new donor representative as every time a new person takes over and not depend on donor organisations handing over the process. This would help establishing trust among stakeholders by showing CUTS as being proactive and moving a step ahead.

Annexure IV: Timeline Analysis

Timeline Analysis with Jaipur Team on Friday, February 06, 2015



Annexure V: List of Positives and Challenges

List of Positives and Challenges as Captured from the Key Informant Interviews

Positives

S.No.		Suggested by
1	Clarity in all stakeholders' roles	All stakeholders
2	Sharing project objectives with all stakeholders	All stakeholders
3	Timely project-related payments as per the agreed schedules	All stakeholders that had financial contracts, under the project
4	Jaipur team	All stakeholders
	Dedicated team that is committed to the project	
	Utmost efforts from the CREW team	
	The team takes comments of the PAC very seriously	
	Timely in their response	
	Persistent	
5	Two-page document sent by Rijit was useful	Tom
6	CUTS is very good at getting people around the table and knows the right people to speak to. Confidence in the advocacy side of CUTS. This project and future projects should build on this strength	Tom, Eiko and Tania
7	The conference was well organised	All stakeholders
8	Active participation of good stakeholders	Tom
9	The project will succeed in its aims in future as there is a good buying level of in with the country partners	Tom and Eiko
10	Advocacy activities would be much better and CUTS will undertake the task	Tom, Eiko and Tania
	CUTS has an upper hand in advocacy role	Owen
11	The organisation visualises the project acquiring A-grade and will reach new heights in future	Tom
12	Ministry of Trade in Zambia got involved immediately which speaks volume about CUTS profile. Getting such a buy in is not easy	Simon
13	Cornelius' participation in Zambia.	Simon

14	Emotional impression about the project: It has been great! Going through the project has positively affected people's thinking and contributing effectively in enhancing their knowledge	Owen
15	Areas that have been covered in the project have not been explored before	Abhijit, Indicus
16	Prior to the project no data was available in some of the sectors which is there at present	Abhijit, Indicus
17	The whole exercise has enabled CUTS to develop a template to conduct similar studies in future	Abhijit, Indicus

Challenges

S. No.		As suggested by
1	Many changes after submission of the project proposal	Eiko, Tania, Abhijit
2	Project timelines did not considered involvement of the government will delay the matter further	Abhijit
3	DCRs being too lengthy	Nathan India
4	Getting the DCRs completed and ensuring that they meet high quality standards so as to be used by the competition authorities across the world	Tania
5	Role of Jaipur team	
6	Jaipur team Setting unrealistic deadlines. Gave very short time to respond to queries and requests for feedback. They provided very less time to respond which affected the time schedules of the people concerned and also the quality of responses	All stakeholders
	At times, it seemed like they were simply passing on reports/data from deliverables to the PAC without any quality intervention by them	Tania and Eiko
7	Selection of the chosen two sectors i.e. Staple Food and Bus Transport made it a very challenging sector as these are complicated sectors for four countries	Tom, Eiko and Abhijit
8	Information on changing of timelines neither defined well nor were informed methodically and precisely	Tania
9	Logframe and timelines were shared initially but the progress of the project was not shared	Tania
10	All advisers were supposed to comment on each and every report	Eberhard

	drafted by the participants involved in the process. This led to a lot of duplications, and also to many public goods problems and motivational issues as well	
11	All advisers were allocated both sectors for quite some time, only later on, some were exclusively dealing with either Staple Food or Bus Transport. This rendered a much more intensive focus on some specific issues	Eberhard
12	Most importantly, there was a considerable gap in the competence of country teams, including rather experienced teams in India and The Philippines and teams in Ghana that would have needed far more support already in an <i>early phase</i> of the project. Thus, it would have been better to divide the manpower between the sectors and countries	Eberhard
13	The design of the project seems to have many flaws as far as the PAC is concerned. Further, things seems to be whetted by the PAC	Amit
14	All stakeholders should be kept well informed of the progress in some way or the other than the PAC, NRG meetings and International conferences	All stakeholders
15	Lacking clear framework on the methodology to develop DCRs as it was not rigorous to come up with a quality document	Owen and Eiko
16	Advisers were not happy with the quality of DCRs	Eiko
17	Work on DCRs started earlier than it should actually have. A framework of issues should have been developed first after which a common approach should have been designed. Work on the framework should have been planned and more given to its development which would have made DCRs easier to develop	
18	CUTS' intervention required to strengthen DCRs to make them relevant to countries	
19	Some of the project partners were not up to the task, had issues in understanding the concept	
20	CUTS was late in intervening with the country partners	
21	CUTS should have taken the issues under consideration along with the reports and whetted these before sending them to the PAC	Eiko
22	Quality data was not available	Tania and Abhijit
23	Research methodology presented was very ambitious	Eiko, Abhijit, Owen
24	A lot of time was spent in reconfiguring	
25	PAC members should have been assigned to countries/sectors at the initial stage only based on their preferences	

26	Adequate time was not given to the PAC to distil information and data	
27	DCRs of the sectors should have been kept separately as changing within the sectors was not feasible	
28	Recurring comment: More and rigorous analysis of policies was required	
29	Figures should have been incorporated in the reports	
30	Executive Summaries of DCRs do not lack facts and figures in	
31	Consistency in the various units should have been maintained	Owen
32	CUTS not involving Nathan by in areas where they could have added desired value	Kristen
33	Nathan worked on the Background Paper and Research Methodology Papers. He provided data collection through generalised methods. In producing the same, he worked with CUTS after which the documents were presented during the NRG meetings. In general, Nathan was not in touch with the country partners. Furthermore, working directly with the country partners would have been a better option and should have helped Nathan to develop customised and quality products	
34	Need for A stringent monitoring plan required for the successful completion of the project	Eiko and Tom
35	One of the major problem faced by the researchers was that they were not directly in touch with the PAC. They were were of the opinion that the PAC had theoretical understanding of ground-level work, and at times, also raised queries and it was not possible to address them.	Abhijit
36	CUTS mediated and made all possible efforts and Indicus addressed the concerns raised to a great extent	
37	Primary reasons for the delay was repeated reviews	
38	Initially, it was not clear what issues were to be covered. For example, it was not well-defined whether intercity bus routes or intra city or both were to be covered. Even states and cities were not finalised. In Staple Foods, it was in the district areas where laws were to be focussed upon? All these things were not marked apparently as the project proceeded	Abhijit
39	The chain of command was quite extensive. Country Partners – CUTS, NRG, PAC and back. Moreover, given the kind of intricacy, this was required as the PAC had to ensure a global perspective	