

Interim Performance Evaluation

Safeguarding Against and Addressing Fishers' Exploitation at Sea



Credit: DFW, SAFE Seas Project, 2020.

United States Department of Labor

Bureau of International Labor Affairs

Office of Child Labor, Forced Labor, and Human Trafficking

March 2021



SUBMITTED TO

United States Department of Labor
Bureau of International Labor Affairs
Office of Child Labor, Forced Labor, and Human Trafficking

ATTENTION

Wei-Cheng Chen, Contracting Officer's Representative
Bureau of International Labor Affairs
United States Department of Labor
200 Constitution Ave. NW
Washington, DC 20210

SUBMITTED BY

IMPAQ International, LLC
10420 Little Patuxent Parkway
Suite 300
Columbia, MD 21044
(443) 256-5500
www.impaqint.com

PROJECT

Interim Performance Evaluation of SAFE Seas Project and Final Performance Evaluation of Vietnam ENHANCE Project
Contract Number: GS-10F-0240U
Order Number: 1605DC-19-F-00263

TASK & DELIVERABLE

Interim Performance Evaluation of *Safeguarding Against and Addressing Fishers' Exploitation at Sea* (SAFE Seas) Project
Final Report

AUTHORS

Ruth Bowen, Lead Evaluator
Angel Ysik, Evaluation Specialist (Philippines)
George Martin Sirait, Evaluation Specialist (Indonesia)

ACKNOWLEDGMENTS

This report presents the findings of the interim evaluation of the *Safeguarding Against and Addressing Fishers' Exploitation at Sea* (SAFE Seas) project. IMPAQ International, LLC (IMPAQ) conducted remote fieldwork for this independent evaluation from October 19 to November 19, 2020 in collaboration with the project team and stakeholders and prepared the evaluation report according to the terms specified in its contract with the United States Department of Labor (USDOL). IMPAQ would like to express sincere thanks to all the parties involved for their support and valuable contributions.

Funding for this evaluation was provided by the United States Department of Labor. This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the United States Government.

The evaluation team is grateful to the SAFE Seas project team in Indonesia and the Philippines for their support and cooperation throughout the interim evaluation. We especially appreciate the team's flexibility and perseverance in supporting our data collection arrangements in the circumstances created by the COVID-19 pandemic. We would also like to thank all the stakeholders who participated in interviews and discussions in Indonesia, the Philippines, and elsewhere.

TABLE OF CONTENTS

Acknowledgments	ii
Table of Contents	iii
List of Acronyms	vi
Executive Summary	viii
Introduction	1
1. Project Context and Description	2
1.1 Project Context	2
1.2 Project Description	2
2. Evaluation Objectives and Methodology	7
2.1 Evaluation Objectives	7
2.2 Methodology	7
2.2.1 Evaluation Questions and Data Sources.....	7
2.2.2 Evaluation Schedule	8
2.2.3 Data Collection Methods and Sampling	9
2.2.4 Data Analysis	10
2.2.5 Limitations	11
3. Findings	12
3.1 Relevance and Coherence of the Project	12
3.1.1 Validity of the Project Design.....	12
3.1.2 Relevance to Stakeholder Needs	16
3.1.3 Coherence with Government and Donor Efforts	18
3.2 Effectiveness of Interventions	19
3.2.1 Indonesia.....	19
3.2.2 Philippines.....	28
3.2.3 Gender Mainstreaming	37
3.2.4 Regional Level Effectiveness.....	37
3.3 Effectiveness and Efficiency of Management and Implementation	38
3.3.1 Management Structure and Implementation Arrangements	38
3.3.2 Effectiveness of the Comprehensive Monitoring and Evaluation Plan	41
3.4 Sustainability	44
3.4.1 Sustainability Strategy and Phase-out Strategy	44
3.4.2 Suitability of Sustainability Plans to Capacities of Local and National Implementing Partners.....	45
3.4.3 Factors Limiting or Facilitating Sustainability of Results	45

4. Lessons Learned and Promising Practices	48
4.1 Lessons Learned.....	48
4.2 Promising Practices.....	49
5. Conclusions	50
5.1 Relevance and Coherence of the Project.....	50
5.2 Effectiveness of the Interventions	51
5.3 Effectiveness and Efficiency of Management	52
5.4 Sustainability	53
6. Recommendations	54
Appendix A: Project Performance Indicator Results as of October 2020	A-1
Appendix B: List of Documents Reviewed	B-1
Appendix C: List of Persons Interviewed	C-1
Appendix D: KII and FGD Guides	D-1
Appendix E: Terms of Reference	E-1

TABLE OF EXHIBITS

Exhibit 1. Project Outcomes and Outputs	3
Exhibit 2. Area Coverage of SAFE Seas Project	6
Exhibit 3. Evaluation Questions	7
Exhibit 4. Qualitative Sample Size and Characteristics	10
Exhibit 5. SAFE Seas Results Chain.....	14
Exhibit 6. Achievement of Outcome 1 Milestone - Indonesia	20
Exhibit 7. Progress in Establishing Safe Fishing Alliance (SFA) in Indonesia	21
Exhibit 8. Progress toward Regulatory and Policy Improvement.....	22
Exhibit 9. Progress toward Labor-Inclusive Fishing Vessel Inspection	22
Exhibit 10. Outcome Level Progress on Outcome 2	23
Exhibit 11. Progress on Awareness among Community, Private Sector & Government	24
Exhibit 12. Progress on Access to Grievance Reporting and Remedy	26
Exhibit 13. Enabling and Limiting Factors in Indonesia	27
Exhibit 14. Achievement of Outcome 1 Milestone - Philippines	28
Exhibit 15. Progress in Establishing Safe Fishing Alliance (SFA) in Philippines.....	29
Exhibit 16. Progress toward Regulatory and Policy Improvement.....	30
Exhibit 17. Progress toward Labor-Inclusive Fishing Vessel Inspection	31
Exhibit 18. Progress on Awareness among Community, Private Sector & Government	33
Exhibit 19. Progress on Access to Grievance Reporting and Remedy	35
Exhibit 20. Enabling and Limiting Factors in the Philippines	36

LIST OF ACRONYMS

AOS	Apostleship of the Seas
ARO	Asia Regional Office
ASEAN	Association of Southeast Asian Nations
ATIP	Prevention and Reintegration of Trafficking in Persons
BFAR	Bureau of Fisheries and Aquatic Resources, Department of Agriculture, Philippines
BWC	Bureau of Working Conditions, DOLE (Philippines)
BWSC	Bureau of Workers' Special Concerns
CMEP	Comprehensive Monitoring and Evaluation Plan
CMMAI	Coordinating Ministry for Maritime Affairs and Investment
COVID-19	Coronavirus Disease 2019
CSO	Civil Society Organization
DA-BFAR	Department of Agriculture's Bureau of Fisheries and Aquatic Resources
DILG	Department of Interior and Local Government (Philippines)
DoJ	Department of Justice, Philippines
DOLE	Department of Labor and Employment, Philippines
DOS J/TIP	Department of State Office to Monitor and Combat Trafficking in Persons
DFW	Destructive Fishing Watch
DSWD	Department of Social Welfare and Development, Philippines
EOP	End of Project
FARMC	Fisheries and Aquatic Resources Management Council (Philippines)
FIHRRST	Foundation for International Human Rights Reporting Standards
FL	Forced Labor
FOA	Funding Opportunity Announcement
GT	Gross tons
IACAT	Inter-Agency Council against Trafficking (Philippines)
IEC	Information, Education and Communication
IFMA	Indonesia Fisherman Manning Agents Association
ILAB	Bureau of International Labor Affairs
ILO	International Labour Organization
IOM	International Organization for Migration
IRR	Implementing Rules and Regulations (Philippines)
IUU	Illegal, Unreported, and Unregulated (Fishing)
LGU	Local Government Unit

LPN	Labor Rights Protection Network
M&E	Monitoring and Evaluation
MARINA	Maritime Industry Authority (Philippines)
MAST	Multi-Stakeholder Initiative for Accountable Supply Chains
MMAF	Ministry of Marine Affairs and Fisheries (Indonesia)
MOA/MOU	Memorandum of Agreement/Memorandum of Understanding
MOM	Ministry of Manpower (Indonesia)
MSW	Ministry of Social Welfare (Indonesia)
MOT	Ministry of Transportation (Indonesia)
NAP	National Action Plan
NGO	Non-Governmental Organization
NPC	National Project Coordinator
OCFT	Office of Child Labor, Forced Labor and Human Trafficking
OND Hesed	Oblates of Notre Dame (OND) Hesed Foundation, Inc.
PC	Project Coordinator
PD	Project Director
PFVSRR	Philippine Fishing Vessel Safety Rules and Regulations
PSA	Pre-Situational Analysis
SAFE Seas	Safeguarding Against and Addressing Fishers' Exploitation at Sea
SALT	Seafood Alliance for Legality and Traceability
SATGAS 115	National Task Force to Combat IUU Fishing (Indonesia)
SFA	Safe Fishing Alliance
TIP	Trafficking in Persons
TOR	Terms of Reference
TOT	Training of Trainers
TPR	Technical Progress Report
TWG	Technical Working Group
USDOL	United States Department of Labor
USG	United States Government
USNO	(Plan International) United States National Office
YPII	Yayasan Plan International Indonesia

EXECUTIVE SUMMARY

Background

On December 1, 2017, the US Department of Labor's Bureau of International Labor Affairs (ILAB) awarded Plan International USA with a 4-year cooperative agreement worth US\$5 million to implement the *Safeguarding Against and Addressing Fishers' Exploitation at Sea* (SAFE Seas) project. The project is managed by Plan International USA and implemented in the field in cooperation with the Plan Asia Regional Office (ARO), Yayasan Plan International Indonesia (YPII) in Indonesia, and Plan country office in the Philippines.¹ The project is implemented in partnership with Destructive Fishing Watch (DFW) in Indonesia and with Oblates of Notre Dame Hesed Foundation (OND/OND Hesed) in the Philippines.

The project aims to combat forced labor (FL) and trafficking in persons (TIP) on fishing vessels in Indonesia and the Philippines. The project design includes two component outcomes consisting of 1) improved enforcement to combat labor exploitation including FL/TIP on fishing vessels, and 2) decreased indicators of labor exploitation including FL/TIP on fishing vessels as a result of increased awareness and access to grievance reporting and remediation.

This interim evaluation provides ILAB, Plan, and the implementing partners with an assessment of the project's performance to date. The evaluation methodology was qualitative, drawing on an analysis of project performance reporting and document review, qualitative interviews, and focus group discussions with key informants. Remote data collection was conducted from October 22 to 29, 2020 in the Philippines, and from November 1 to 11, 2020 in Indonesia. The original fieldwork was postponed from March 2020 due to the Coronavirus Disease (COVID-19) outbreak. The evaluators remotely interviewed 103 respondents in the US, Indonesia, and the Philippines using online platforms as well as telephone calls.

Main Findings and Conclusions

Relevance and Coherence. The project's aim to combat FL and TIP on fishing vessels in Indonesia and the Philippines aligns well with the need to address these problems in both countries, particularly among fishers engaged in commercial fishing. In the Philippines, including sites in Palawan where artisanal and municipal fishing on smaller vessels is the major fishing activity, the project is also relevant to the needs of local government and fishing communities where debt bondage and child labor are common practices. However, this is not as strategic to the overall goal as is the major tuna port of General Santos.

The project theory of change, that better government enforcement capacity through coherent regulations and coordinated labor inspection in fishing, together with awareness, grievance reporting, and remediation services, will enable a reduction in indicators of FL and TIP, is valid for both countries. The strategies all address current gaps and limitations regarding each issue. However, the factors affecting private sector compliance were not clearly established in the intervention logic, which is reflected in slower progress in this challenging area. The project document design anticipated that the private sector would recognize the "win-win" benefits of taking part in safe fishing alliances (SFAs), but their engagement is at a developmental stage in both countries. In response, SAFE Seas Indonesia and the Philippines are strengthening their private sector advocacy approaches.

In both countries, the fundamental SAFE Seas approach is to work closely with government-led initiatives. In Indonesia, the project has proven highly relevant to the needs and interests of

¹ The report uses "Plan" to refer collectively to Plan International USA, Plan Asia Regional Office, Yayasan Plan International Indonesia, Plan Philippines, and members of the SAFE Seas project management team. References to specific Plan country offices are spelled out.

national government stakeholders, as well as provincial government and service providers in North Sulawesi. This has contributed to the success in establishing the multi-stakeholder SFA to lead the project interventions. Government authorities in Central Java are not as strongly engaged, though the project is relevant to the problems faced by domestic and foreign vessel fishers coming from the province. Based on our consultations, fishers, family members, community representatives, and some trade union representatives find the fishers centers and awareness raising activities highly relevant to their needs. Representatives of Indonesian recruitment agencies and a fishing company in Bitung welcomed the project's engagement, reflecting increasing private sector interest in national and international labor standards.

In the Philippines, the project objectives are relevant to the expressed interests of national and sub-national government, particularly the Department of Justice (DOJ), Department of Labor and Employment (DOLE), and increasingly to marine and fisheries environmental and vessel safety inspection agencies. International stakeholders such as Greenpeace and several embassies are highly supportive of the project's agenda. Overall, provincial and municipal government offices such as social welfare, tourism, sustainable development, and members of the Philippines' anti-trafficking structures welcome the project's support in coordinating on fishers' rights, though there is some resistance to joint inspections among local government executives. Different fisher protection concerns are prominent among fisher representatives in General Santos, where the detention of Filipino fishers is a key concern, compared with Palawan, where low income returns and debt bondage are key concerns, but the project's key awareness and education initiatives are relevant to all the communities. The major tuna industry federation has readily participated in project-facilitated dialogue on fishing labor regulations, while voicing concerns on the regulations.

Effectiveness of Interventions. Overall, the project is gaining momentum and success after a delayed start in Indonesia and changes in project leadership in the Philippines and Indonesia in 2020. The COVID-19 outbreak has caused delays project-wide, which have been well addressed but not entirely surmounted through online communications.

SAFE Seas' start in Indonesia was delayed by about 8 months due to the prolonged government approval process. Despite this delay, the project has made good progress on its implementation plan and achievements toward Outcome 1, at national and local levels, and substantially toward Outcome 2, where some planned activities have not started yet. Progress toward Outcome 1 targets is demonstrated through the creation of a functioning national multi-agency team and completion of a draft National Action Plan (NAP) for the Protection of Seafarers and Fishers. The draft NAP brings the project on track toward regulatory harmonization, providing a 5-year roadmap toward regulatory change. At the provincial level, the project-initiated safe fishing advisory bodies are operating well in North Sulawesi but not yet functional in Central Java. The government agencies, with project support, are working toward a nationally accepted multi-agency inspection procedure and checklist, but its development is still in its infancy. Key players at the national level have accepted the principle of multi-agency inspection and a trial joint inspection was conducted in Bitung, North Sulawesi, with plans for further joint inspections in Jakarta. Under Outcome 2, Indonesia has progressed well with the creation of two fishers centers in Bitung and Tegal serving the information and grievance reporting needs of fishers. The project has commenced awareness raising and advocacy with the private sector toward supply chain responsibility, with some evidence available to the evaluation of support for compliance with anti-FL/TIP regulations, through participation in awareness campaigns and participation in training on fisher employment regulations. SAFE Seas' awareness raising initiatives in vocational schools were well received by the school principals and fishery students.

The strong ownership of the government stakeholders at the national level and in North Sulawesi has facilitated progress, as well as the skills and perseverance of YPII and DFW. The key challenges include the different coordinating ministries involved at the national level, the

complexity of coordinating enforcement procedures among agencies, and the varying political will at sub-national level, where fishers' protection is sometimes overshadowed by disputes over government controls on trawling gear. Collaboration with the private sector remains challenging generally, given sensitivity around fishing workers' rights.

The short implementation time of 2 years to date has limited Indonesia's progress towards Outcome 2, where initiatives related to community-based early detection, formalization of the fishers center procedures are just starting, and establishment of a Web-based information portal is yet to be established. With only 12 months remaining for the project as a whole, and 9 months remaining for the DFW sub-agreement, there is a risk that the emerging good practices will not reach maturity within the project lifetime.

In the Philippines, SAFE Seas implementation has been underway almost 3 years. Under Outcome 1, the inter-agency dialogue on fisher protection has been strengthened through the existing anti-trafficking council. However, lack of full commitment of key government partners to lead the SFA has been a stumbling block toward advancing regulatory reform and multi-disciplinary inspection guidance. As such, progress has been slow in amending or creating policies and regulations and developing a national roadmap toward harmonized labor inspection. Plan US will recruit international consultants in early 2021 to help advance vessel inspection policy and operations in both countries. With the support of government and non-government allies at the national level, SAFE Seas has successfully increased multi-stakeholder dialogue, including between DOLE and the tuna fishing industry on the DOLE and Maritime Industry Authority (MARINA) regulations. SAFE Seas' support to build the capacity of BFAR's environmental fisheries observers to assist in identifying signs of FL/TIP on board vessels is also a key contribution. At the local level, the project has been relatively successful in forming local-level SFAs linked to existing anti-trafficking councils with active engagement of key local government representatives. Toward joint inspections, the project has advanced joint labor inspection protocols at the local level, including the success of a high-profile joint inspection trial in Palawan, providing an example for national consideration.

For Outcome 2, achievements are on track regarding the outputs for raising awareness through the activities at municipal and barangay levels in Palawan, General Santos, and Sarangani.² While the first project survey of fisher awareness of FL/TIP in 2020 showed low awareness levels, barangay representatives of the Fisheries and Aquatic Resource Management Councils (FARMCs) appear sensitized to the issues and keen to carry the messages to the community. To increase fishers' ability to report grievances and access remedy, discussions are underway to build on the Apostleship of the Seas' (AOS) seafarers' support center in General Santos, but service development is still at the conceptual stage across the project sites. The development of remediation services is behind the workplan, partly due to COVID-19 disruptions and due to the high workload and staff turnover at the field level.

Effectiveness and Efficiency of Management. The project's overall management and communications structure is effective with strong oversight and supervision mechanisms. However, the multiple levels of governance associated with Plan's organizational structure lead to lengthy reporting processes and some duplication of reporting lines between project staff, the Project Director, country office management, and Plan USA, reducing management efficiency.

Plan's selection of implementing partners has added value to the implementation strategy, using the existing networks of OND in its operation areas and of DFW in North Sulawesi. Plan's coordination with the implementing partners is generally strong, while coordination and communication could be improved in Indonesia. The evaluation finds the project staffing structure in Plan Philippines effective overall, but OND has a shortage of staff.

² The barangay is the lowest administrative level in the Philippines

Staff turnover has interrupted the flow of implementation in both countries, within Plan and OND in the Philippines, and YPII and DFW in Indonesia; while Plan country offices have delegated their staff to minimize the disruption. The highly demanding role of the field staff has reportedly contributed to staff turnover at OND and Plan Philippines, posing an ongoing threat to implementation continuity. Notably, the SAFE Seas management team has responded effectively to the COVID-19 pandemic through strong contingency planning in both countries.

The monitoring and evaluation (M&E) system, comprising the Comprehensive Monitoring and Evaluation Plan (CMEP) and cross-country reflection processes, is thorough and well used to inform planning. The evaluation identified elements of the CMEP results framework and indicators that could be adjusted for efficiency as well as to increase value of the information obtained.

Sustainability. The project has not defined a concrete phase-out strategy but has approached sustainability through its overarching strategy towards stakeholder ownership of the SAFE Seas agenda. Building ownership is a valid approach, but some interventions would benefit from a specific exit plan, namely the fisher centers, village-level early warning systems, helpdesks and information technologies yet to be introduced by SAFE Seas.

In Indonesia, the government endorsement of the SFA team assures the pathway for sustained multi-agency leadership and coordination. The NAP for Protection of Seafarers and Fishers, once approved, also assures a pathway towards ongoing national action through government funding. SAFE Seas' contributions to building multi-disciplinary labor inspection systems appear likely to produce durable results, given favorable political will among the key agencies, and the project's ongoing technical support. There are positive prospects for sustaining the new fishers centers with development of standard operating procedures and government interest in replicating the centers, while the time remaining poses a risk for managing the transition to a permanent home institution. Changes in established fishing industry practices, community early warning approaches, and the Fishers Portal require more intensive effort to create sustainability pathways.

In the Philippines, the national alliance for fish workers' protection is likely to continue, given SAFE Seas' strengthening of the IACAT working group, but its effective functioning depends on commitment of the key government partners to lead it. Continued collaborative action by local SFAs is supported by legal ordinances that are underway and the commitment of local government members. The project is helping to build momentum and technical capacity for multi-agency participation in fishing vessel labor inspection, while institutionalized policies and practices will depend on achieving consensus among national and local parties as well as government resource commitments. Influencing attitudes and practices in the commercial fishing industry is a long-term endeavor, but there is potential for SAFE Seas to sustain improved industry support for amended fishing labor regulations and improved compliance. In the absence of an extension of performance time, the prospects to build sustainable community-based protection systems, as well as fisher grievance reporting and referral systems are uncertain, as time is short to build stakeholders' capacities and mobilize resources.

Summary of Recommendations

We provide full details of the recommendations in Section 6 of the report.

To Plan and Implementing Partners (Project-Wide)	
1. Submit a proposal to USDOL to extend the project duration by 12 months.	The evaluation team proposes providing an extension of 12 months to enable delayed activities to be implemented and existing interventions to reach a sustainable status.
2. Improve sustainability and exit planning in each country.	The project should create specific sustainability and phase-out plans per country, with sustainability targets. The sustainability plan should identify exit plan priorities in case an extension is granted, and in case it is not granted.
3. CMEP adjustments.	The evaluation suggests several adjustments to the CMEP system.

4. **Enhance gender responsiveness** in project activities, ensuring that the project responds to the needs of female family members and female fishers in Indonesia and the Philippines.
5. **Strengthen regional sharing of lessons learned and promising practices in the SEA region.** SAFE Seas should develop and disseminate knowledge products to capitalize on the project's cross-country structure. Relevant stakeholders include the *South East Asia Ship to Shore Rights Project*.

To SAFE Seas Indonesia

6. **Enhance coordination between YPII and DFW.** To strengthen the coordination and collaboration between YPII and DFW, the partners should discuss the lines of task division and task cooperation and establish more clarity on the division of tasks.
7. **Prioritize areas for continued support to the NAP of the National Team.** Work with the National Team to prioritize what support it needs from the SAFE Seas Project in the remaining project period to advance the NAP.
8. **Step up efforts toward consolidating the SFA in Central Java.** The project should intensify local government ownership and support of the provincial forum by providing fishing vessel worker FL/TIP data to the governor and key government offices, as well as sharing experience from North Sulawesi.
9. **Consolidate the fishers centers' operations procedure and initiate the transition to long-term institutional managers.**
10. **Enhance private sector advocacy.** To the extent that the project duration permits, intensify supply chain advocacy, working with selected fishing companies and buyers as models and advocates, linked with regional advocacy. Subject to further discussion with MMAF on its Human Rights Certification initiative for businesses, SAFE Seas should continue to support this initiative with fishing companies in Bitung as a good practice.
11. **Enhance fisher labor rights awareness and education.** Focus on strengthening awareness raising among fishers, their families, and communities through the Community Based Early Detection Mechanism. Secondly, engage vocational institutions in local SFA working groups and support them with learning materials on acceptable working conditions useable for formal and non-formal education for fishers after the project ends.

To SAFE Seas Philippines

12. **Address the staffing shortfall and workload** by recruiting additional officers to support fieldwork in General Santos, Sarangani and Palawan.
13. **Prioritize and strengthen the national SFA strategy.** In consultation with the TWG leadership, SAFE Seas should determine whether the thematic working groups are feasible; and consider alternative structures. To gain more traction at the national level, the team should strengthen the linkages with civil society labor protection advocates and also enhance linkages between the national SFA and the subnational SFA agendas, highlighting progress of the subnational efforts.
14. **Enhance private sector engagement.** SAFE Seas should pursue a wider range of strategies to engage private sector support, including supply chain advocacy, celebrity advocacy, and human rights certification of businesses as being introduced in Indonesia.
15. **Strengthen training of trainers on FL/TIP for FARMC to continue fisher advocacy.** The FARMC groups at the community level demonstrate would benefit from a systematic TOT approach for the leaders to ensure that community education activities continue.
16. **Consult with local SFAs and communities on the preferred model for grievance and reporting services.** The project and its partners should consult with communities and fisher representatives on the preferred channels in different locations (large ports versus municipal fishing), rather than replicating the Indonesia model in the Philippines.
17. **Data collection and case tracking of FL/TIP in fishing.** To make more factual data available for policy advocacy, as well as to track the nature and extent of grievance cases, support the DOJ/IACAT to integrate fisher TIP/FL cases within the digital case management and tracking system for overseas Filipino workers. The digital case management system should be linked to the web-based fishing portal under development, with access rules established for public and confidential information.

To ILAB

18. In future two-country projects, **it may be more effective for ILAB to pre-select the countries**, rather than leaving the second country selection to the proposals of the applicants.
19. During the CMEP development, **ILAB should permit adjustment to the formulation of outcomes** toward a clearer logic for evaluation purposes, while not altering the project's fundamental objectives and scope.

INTRODUCTION

The Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) is an office within the Bureau of International Labor Affairs (ILAB), an agency of the U.S. Department of Labor (USDOL). ILAB's mission is to promote a fair global playing field for workers in the United States and around the world by enforcing trade commitments, strengthening labor standards, and combating international child labor (CL), forced labor (FL), and human trafficking.

OCFT works to combat CL, FL, and human trafficking around the world through international research, policy engagement, technical cooperation, and raising awareness. Since OCFT's technical cooperation program began in 1995, the U.S. Congress has appropriated funds annually to DOL for efforts to combat exploitive child labor internationally. This funding has been used to support technical cooperation projects in more than 90 countries around the world. Technical cooperation projects funded by DOL support sustained efforts that address child labor and forced labor's underlying causes, including poverty and lack of access to education.

DOL, through ILAB, contracted with IMPAQ International, LLC (IMPAQ) to conduct an interim performance evaluation of the *Safeguarding Against and Addressing Fishers' Exploitation at Sea* (SAFE Seas) project. The evaluation provides DOL and its grantees with a fact-based and independent assessment of the project's performance to date, including an in-depth analysis leading to conclusions about the progress against established targets. The evaluation also strives to identify the factors contributing to the results, whether enabling or limiting, looking at aspects such as relevance of the design, project management, changes in operating environment, and changes in context. The evaluation team conducted a primarily qualitative study to assess the project's effects and the likely sustainability of results. In parallel, the evaluation identifies relevant lessons and good practices with a view to strengthen the project's remaining period of implementation and inform future programming.

This interim evaluation report is structured as follows: Section 1 outlines the project itself and the Theory of Change (TOC) it follows. Section 2 describes the evaluation objectives and methodology, including the approach to data collection and the limitations, challenges, and mitigations the evaluation team encountered and applied when collecting and analyzing data. Section 3 details the evaluation findings, responding to each of the evaluation questions. Section 4 provides lessons learned and promising practices identified by the evaluation team. Section 5 provides conclusions, and Section 6 provides recommendations based on the findings of the evaluation.

1. PROJECT CONTEXT AND DESCRIPTION

1.1 Project Context

Labor abuses, including FL and human trafficking in the fisheries sector have come to the forefront of international attention in recent years, most notably highlighting abuses in Southeast Asia and the Pacific. As a global and cross-border industry, work in fishing takes place in an international as well as national governance context. Efforts are increasing in Southeast Asia toward multi-stakeholder and harmonized action among countries in the region to end FL and human trafficking in the fishing industry.³

Indonesia and the Philippines are among the largest fish suppliers in the world. Indonesia has a large and growing fishing industry and aims to be a major maritime country. The Philippines is also one of the world's major fish producers and exporters, and home to the tuna capital of General Santos. There have been documented indicators of labor abuse in both countries including cases of FL and TIP. In Indonesia, FL and Trafficking in Persons (TIP) happen on foreign-owned and domestic vessels, especially on industrial fishing vessels and those above 30 gross tons (GT). In the Philippines, many of the fishers are unregistered and work on illegal, unreported, and unregulated (IUU) vessels where mistreatment of workers is often prevalent. Evidence of forced labor in the tuna fishing industry in General Santos, among both handline and purse seine vessels, was documented by Verité in 2016.⁴

Indonesia and the Philippines are signatories to numerous international conventions addressing maritime labor rights and FL more broadly, including the Forced Labour Convention, Seafarers' Identity Documents Convention, and the Maritime Labour Convention.⁵ However, greater efforts are required to tackle the widespread labor abuses in the industry. Only one of the countries in the region, Thailand, has ratified the International Labour Organization (ILO) Convention 188 (2007) on work in fishing. In this context ILAB's OCFT issued a Funding Opportunity Announcement (FOA) to address FL and TIP on fishing vessels in Asia and the Pacific, naming Indonesia as a pre-selected country, and including the Philippines among potential second countries. The Philippines was added as the second country as part of Plan USA's proposal selected by ILAB.

1.2 Project Description⁶

On December 1, 2017, USDOL's ILAB awarded a \$5 million, 4-year cooperative agreement (CA) to Plan USA to implement the *Safeguarding Against and Addressing Fishers' Exploitation at Seas* (SAFE Seas) project. The project is managed by Plan USA and implemented in the field in cooperation with the Plan Asia Regional Office (ARO), Plan Philippines and Yayasan Plan International Indonesia (YPII). The project is implemented in partnership with Destructive Fishing Watch (DFW) in Indonesia and Oblates of Notre Dame Hesed Foundation (OND/OND Hesed) in the Philippines.

³ The Southeast Asian Forum to End Trafficking in Persons and Forced Labour of Fishers was established in December 2018, bringing together representatives from government, employer, worker, and civil society representatives from eight countries to harmonize and coordinate efforts in the region.

https://www.ilo.org/jakarta/info/public/pr/WCMS_654546/lang--en/index.htm

⁴ Verité. 2016. Research on Indicators of Forced Labor in Supply Chain of Tuna in the Philippines. The handline operators are renowned for taking on additional unregistered crew as "passengers" to increase the quantity of the catch.

⁵ https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102938;

https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102970

⁶ The description of the project is largely taken from the project document, the Comprehensive Monitoring and Evaluation Plan (CMEP) and the ILAB Funding Opportunity Announcement (FOA-ILAB-17-04).

The project objective is to *combat FL and human trafficking or TIP on fishing vessels in Indonesia and the Philippines*. Supporting the objective, the project design has two intended outcomes: The first is improved enforcement to combat labor exploitation including FL/TIP on fishing vessels; and the second is decreased indicators of labor exploitation including FL/TIP on fishing vessels.

Exhibit 1 shows the outcomes, 5 sub-outcomes, and 10 outputs that comprise the project results framework (RF).⁷

Exhibit 1. Project Outcomes and Outputs

Outcome 1: Improved enforcement to combat labor exploitation including FL/TIP on fishing vessels
Sub-Outcome 1.1: Regulatory and policy framework to combat labor exploitation including FL/TIP on fishing vessels improved
Output 1.1.1: Final draft of improved regulations and policy briefs submitted to government
Sub-Outcome 1.2: Quality of labor-inclusive inspections on fishing vessels procedures and implementation improved
Output 1.2.1: Inspection mechanism among related key government agencies is improved
Output 1.2.2: Roadmap for establishing fishing vessel labor-inclusive inter-agency inspections working unit disseminated among relevant stakeholders
Output 1.2.3: Fishing vessels and labor inspectors trained on incorporating labor exploitation including FL/TIP into inspections
Outcome 2: Decreased indicators of labor exploitation including FL/TIP on fishing vessels
Sub-Outcome 2.1: Improved understanding among government, private sector, local communities and fish workers of acceptable work conditions in the fishing industry
Output 2.1.1: Improved private sector support of government policies related to labor and labor exploitation including FL/TIP in the fishing industry
Output 2.1.2: Multi-Stakeholder Initiative for Accountable Supply Chains (MAST) initiative is introduced in Indonesia and the Philippines ⁸
Output 2.1.3: Increased understanding of labor exploitation including FL/TIP on fishing vessels among fish workers and community members
Sub-Outcome 2.2: Ability of fish workers and their families to report exploitative working conditions on fishing vessels improved
Output 2.2.1: Reporting mechanisms using appropriate technology created/ strengthened
Sub-Outcome 2.3: Improved access to remedies of FL/TIP and/or exploitative working conditions on fishing vessels
Output 2.3.1: Strengthened networks and referral mechanisms for fish workers on fishing vessels, especially for FL/TIP victims
Output 2.3.2: Updated referral network directory for fish workers on fishing vessels, especially for FL/TIP victims

To achieve the objective, Plan intends to work closely with various actors who deal with forced labor, trafficking in persons and fishery industry issues. At the national and local levels SAFE Seas works with ministries, public agencies, private businesses and associations, service providers, as well as ships' captains, civil society organizations (CSOs) and communities. The project also involves fish workers as individuals or as members of fish worker unions to combat FL/TIP in the selected implementation sites.⁹ At the regional and global levels, SAFE Seas

⁷ SAFE Seas Results Framework, Comprehensive Monitoring and Evaluation Plan. December 2018

⁸ The MAST initiative was dropped in the Philippines during 2019, as the project management team did not consider it suitable to the context, but it has been re-instated during 2020 through discussion between the new National Project Coordinator and the Project Director, since supply chain advocacy is considered a valuable approach. The evaluation notes that the project's next Technical Progress Report and performance reporting needs to update this shift.

⁹ In Indonesia, key government stakeholders include the Coordinating Ministry for Maritime Affairs and Investment (CMMAI), the Ministry of Marine Affairs and Fisheries (MMAF), Ministry of Transportation (MOT) and the Ministry of

engages other international organizations that have experience in FL/TIP to work on solutions, especially in Indonesia where several initiatives have been launched, to help reduce the incidence of FL/TIP through improved regulation and increased awareness.

In both countries, as a crosscutting strategy supporting both outcomes, the project intends to convene a Safe Fishing Alliance (SFA) at national and local levels, bringing together government, private sector representatives, government, civil society, and workers associations to guide the project activities. Three working groups are proposed as the standard cross-country approach; the first focusing on policy and regulations; the second on labor inspection; and the third on awareness, access to reporting, and remedial services.

The main strategies and activities under each outcome are as follows:

Outcome 1. Toward Outcome 1, SAFE Seas works with government and other concerned agencies at national and sub-national levels to bring about improvements in policy and regulatory frameworks for protection of fishers, as well as inclusion of labor standards in fishing vessel inspection.

Sub-Outcome 1.1: Regulatory and policy framework

Towards the improvement of the regulatory and policy framework SAFE Seas works via the formation of multi-stakeholder advisory groups, known as SFAs, to drive the project at national and sub-national levels. In Indonesia the SFA is a newly created structure, while in the Philippines it is situated within the existing government mandated Inter-Agency Council Against Trafficking (IACAT).

The project creates opportunities for stakeholders to discuss policy reform both within and outside of the SFA structure, for example with the tuna industry federation in Mindanao in the Philippines. The intention is to review the national policies and regulations on FL and TIP, using the project's pre-situational analysis as a reference guide, and develop a policy milestone plan, and to eventually strengthen regulations and policies, including drafting of policies.

Sub-Outcome 1.2: Quality of labor-inclusive inspections on fishing vessels procedures and implementation improved

The project aims to facilitate improved inspection of labor conditions on fishing vessels by facilitating a coordinated approach among the related agencies that are involved in vessel inspections, in addition to the labor ministries. The approach is dependent on the consultation with the related agencies and may take the form of joint agency or multi-disciplinary inspections or harmonized processes across agencies to ensure inclusion of labor inspection and indicators of FL and TIP. Steps involved per country vary, but include providing exposure to international practices, developing harmonized inspection guidelines, trialing multi-agency inspections in provincial locations; revising inspection tools and training inspectors to implement guidelines; supporting the inspection working groups (national/local) to implement, monitor and learn from multi-disciplinary inspections, and dialogue with the private sector to prepare them for changes to procedures.

Outcome 2 strategies: Activities under Outcome 2 focus on raising awareness among fishers and their communities, the private sector, and government parties on acceptable conditions of work for fishers; increased access of fishers to reporting services in case of grievances; and improved access to remedies. Key activities per sub-outcome include:

Manpower (MOM). In the Philippines, key government stakeholders are the Department of Labor and Employment's (DOLE) Bureau of Working Conditions (BWC), Department of Agriculture's Bureau of Fisheries and Aquaculture Resources (DA-BFAR), Maritime Industry Authority (MARINA), Department of Justice (DOJ), Philippines National Police (PNP), and the Philippines Coast Guard (PCG).

Sub-Outcome 2.1: Improved understanding among government, private sector, local communities, and fish workers of acceptable work conditions in the fishing industry

Awareness raising and education activities are directed at three main groups, fish workers and communities, the private sector and government. The main activities comprise awareness raising campaigns within local fishing communities, via community meetings and distribution of information, education, and communication (IEC) materials on vessels and in ports; building capacity of community-based organizations (CSOs) to support implementation of the campaign, with the support of DFW OND Hesus; building private sector support for polices on working conditions in fishing through dialogue and advocacy; introducing a supply-chain advocacy approach based on the MAST approach in Thailand. This is a joint Thai-US coalition, led by the Thai Labor Rights Protection Network (LPN) that addresses the root causes of trafficking in the Southeast Asia seafood sector; providing training for private sector recruitment companies on regulations governing fisher employment (Indonesia); and enhancing training for fishing industry workers on fishers' rights and related regulations in fishing industry vocational institutions (Indonesia).

Sub-Outcome 2.2: Ability of fish workers and their families to report exploitative working conditions on fishing vessels improved

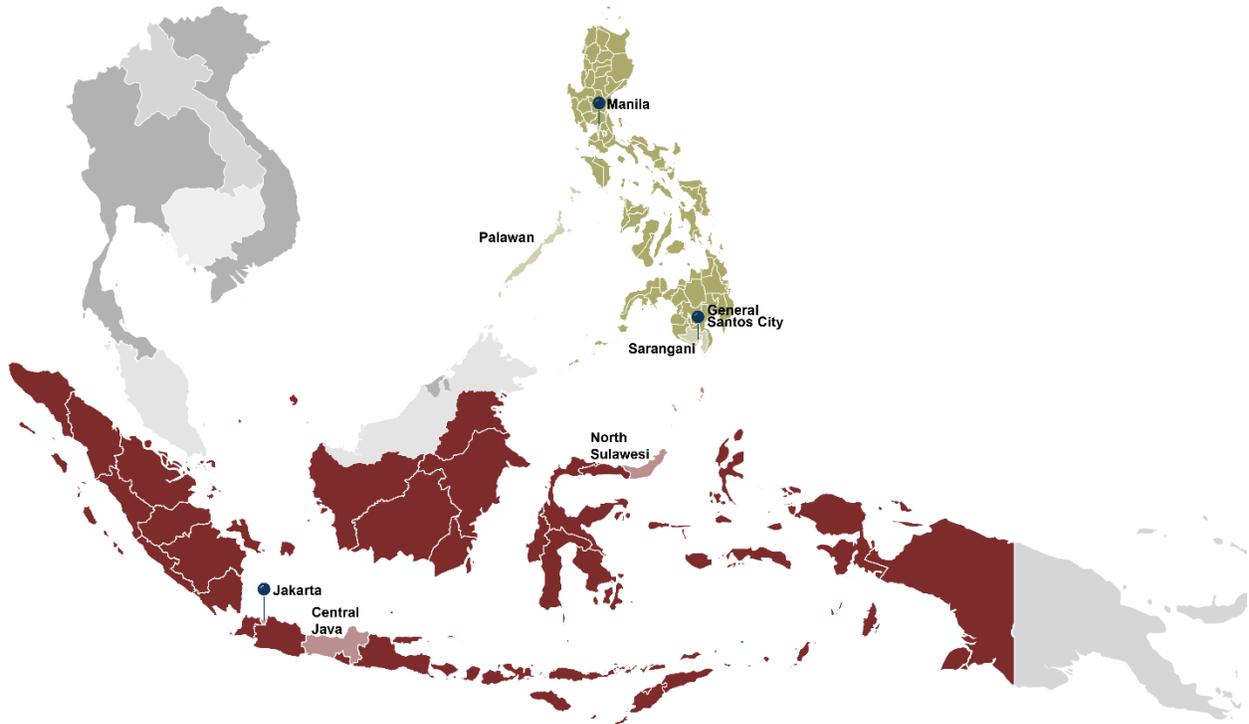
Key strategies for strengthening reporting mechanisms are supporting establishment of help desks in fish ports and/or grievance hotlines dedicated to fish workers; establishing an early detection system in local communities through building village-level leadership on awareness of fishers' labor rights and forming linkages with reporting mechanisms; strengthening the national reporting information system by housing a reporting database and a remedial services database through creation of a web-based portal called FishingPort.net.

Sub-Outcome 2.3: Improved access to remedies of FL/TIP and/or exploitative working conditions on fishing vessels

Linked with improving reporting services, and adapted to national contexts, the activities supporting access to remedial services involves developing improved service delivery and referral network guidelines; producing an online and hard copy service directory to facilitate referral of victims/survivors to service organizations; strengthening referral networks for remedial services; increasing fishers' awareness of support services; and supporting the service delivery groups to use data on the FishingPort.net.

Implementation sites. In Indonesia, SAFE Seas works in three locations: Jakarta, where national level policy, coordination, and awareness raising activities take place; North Sulawesi Province (Bitung district); and Central Java Province (Tegal district, Brebes district and Pemalang district) In the Philippines, SAFE Seas is implemented at the national level and in Palawan Island (Tay Tay municipality and Puerto Princesa City), General Santos City, and Sarangani Province (Glan and Kiamba municipalities).

Exhibit 2. Area Coverage of SAFE Seas Project



Source: SAFE Seas Project Document, October 11, 2019

2. EVALUATION OBJECTIVES AND METHODOLOGY

2.1 Evaluation Objectives

The objectives of the interim performance evaluation as determined by the Terms of Reference (TOR, Appendix E) are to:

1. Assess the relevance of the project in the cultural, economic, and political context in the countries, as well as the validity of the project design and the extent to which it is suited to the priorities and policies of the host governments and other national stakeholders.
2. Determine whether the project is on track toward meeting its objectives, identify the challenges and opportunities encountered in doing so, and analyze the driving factors for these challenges and opportunities.
3. Assess the effectiveness of the project's strategies and the project's strengths and weaknesses in project implementation and identify areas in need of improvement;
4. Provide conclusions, lessons learned, and recommendations.
5. Assess the project's plans for sustainability at local and national levels and among implementing organizations and identify steps to enhance its sustainability.

The evaluation is intended to provide ILAB, Plan, and the project implementing partners with an assessment of the project's performance to date. The evaluation findings, conclusions, and recommendations are also intended to inform any project adjustments that may be needed to improve performance, and to inform the design of future efforts to eliminate FL and human trafficking in the fishing sector.

2.2 Methodology

This section describes the evaluation questions and data sources, data collection and analysis methods, schedule, and study limitations.

2.2.1 Evaluation Questions and Data Sources

The evaluation team set out to answer specific questions agreed upon by ILAB, Plan, and IMPAQ. These questions address issues within the Organisation for Economic Co-operation and Development - Development Assistance Committee (OECD-DAC) criteria of relevance, coherence, effectiveness, efficiency, and sustainability.

Exhibit 3 lists the evaluation questions and the section of the report where each question is answered. The detailed matrix of questions and the data collection method applied for each is found in the TOR.

Exhibit 3. Evaluation Questions

No.	Question	Report Section
Relevance and Coherence		
1	To what degree is the project design, theory of change and intervention logic appropriate and adequate to combat FL and human trafficking on fishing vessels in Indonesia and the Philippines?	3.1.1
2	To what extent are the project strategies relevant to the specific needs of project participants, communities, and other stakeholders?	3.1.2
3	To what extent has the project established links and coordinated with government-led efforts to eliminate FL and TIP and with other donor-funded interventions?	3.1.3

No.	Question	Report Section
Effectiveness and Efficiency		
4	To what extent is the project making progress towards its primary objective and planned outcomes? What are the key results achieved so far, specifically regarding improving the: a) Regulatory and policy framework to combat labor exploitation on fishing vessels and the quality of labor-inclusive inspections on fishing vessels? b) Understanding among government, private sector, local communities, and fish workers of acceptable work conditions in the fishing industry? c) Ability of fish workers and their families to report exploitative working conditions on fishing vessels? d) Access of fishery workers to remedies of FL/TIP or exploitative working conditions on fishing vessels?	3.2
5	What are the key internal or external factors that limit or facilitate the achievement of project outcomes?	3.2
6	How effective and efficient are the project's implementation and management strategies? ¹⁰ What are the key strengths and weaknesses in project implementation and management? What areas need improvement?	3.3.1
7	Does the project's Comprehensive Monitoring and Evaluation Plan (CMEP) provide a valid means to monitor project progress and achievements; and to what extent has the monitoring and evaluation (M&E) system been effectively used by the project to inform management decision making?	3.3.2
8	To what extent has gender mainstreaming been addressed by the project? Has the project integrated gender equality as a cross-cutting concern throughout its methodology and all deliverables?	3.2.3
Sustainability		
9	To what extent has a phase-out strategy been defined and what steps have been taken to ensure sustainability?	3.4.1
10	To what extent are the project's plans for sustainability adapted to the local level, national level, and capacity of implementing partners?	3.4.2
11	Are there any factors that are likely to limit or facilitate the technical or financial sustainability of project results?	3.4.3

The evaluation team addressed the evaluation questions using multiple sources of evidence, combining primary qualitative data with secondary qualitative and quantitative data, to the extent that it was available, as described below. Due to the context of the Coronavirus Disease 2019 (COVID-19) pandemic, IMPAQ, Plan, and ILAB agreed that all primary data would be collected remotely.

2.2.2 Evaluation Schedule

The evaluation team completed a project document review in February 2020 in advance of fieldwork initially scheduled in March 2020. Given travel restrictions related to the COVID-19 pandemic, fieldwork was rescheduled to October 19 to November 13, 2020. In October 2020, the evaluation team re-familiarized themselves with the project documents and reviewed additional documents from Plan that were submitted prior to the new fieldwork dates.

Prior to starting remote fieldwork in the Philippines and Indonesia, the evaluation team hosted logistics calls with the Project Director and staff to plan the remote data collection. Plan assisted the evaluation team in scheduling key informant interviews (KIIs) and focus group discussions (FGDs). The evaluation team identified the criteria for selecting KII and FGD participants and

¹⁰ Note: This question was originally worded "intervention and management strategies" but it is revised as *implementation* and management strategies, because the effectiveness of the intervention strategies is addressed by questions 4 and 5.

shared the criteria with ILAB and Plan, along with a draft list of stakeholder groups. Plan and ILAB suggested changes and provided stakeholder representatives' names and/or contact information, as needed.

The remote fieldwork schedule was determined by the project teams in consultation with the evaluation team based on scheduling and the availability of KII and FGD participants.

Following the data collection, the evaluation team held debriefing meetings with Plan USA and with ILAB to discuss key findings and recommendations. Data analysis and report writing were conducted in November and December 2020.

2.2.3 Data Collection Methods and Sampling

The evaluation team used the following methods to gather primary and secondary data:

Document review. The evaluation team reviewed numerous project documents and context publications including the project document, CMEP, Pre-situational Analysis Report, semi-annual Technical Progress Reports, project modification approvals, communications campaign materials, and other supporting materials. Appendix B provides a complete list of the documents reviewed.

Remote KIIs and FGDs. The evaluation team collected primary data using KIIs and FGDs designed to obtain perspectives from a comprehensive range of stakeholders on the project's implementation and progress. The data collection instruments are included at Appendix D.

The stakeholder groups comprised ILAB staff, Plan staff (these include Plan USA, the SAFE Seas project team in each country and at the regional level, and Plan International country offices), implementing partner staff, as well as government, private sector, trade union, non-government organizations (NGOs), and community representatives in each country. Stakeholder KIIs and FGDs were held in each country with national government and other national-level stakeholders, subnational stakeholders from government, private sector, and fishers, and their representatives from the project sites. For the project's Philippines component, the evaluation team met remotely with a small number of stakeholders from Manila, Palawan, General Santos City, and Sarangani province and respective implementation municipalities/barangays. For the Indonesia component, respondents were based in Jakarta, Bitung in North Sulawesi, and Tegal area in Central Java.

The evaluation team facilitated remote FGDs with fishers and fishers' family members, fisher representatives, and local community authorities. In the Philippines, three FGDs were held with participant fishing communities and barangay stakeholders, and another three KIIs with fishers/family members. In Indonesia, two FGDs were held with fish workers and families, and two FGDs were held with local/provincial government authorities participating in inter-agency safe fishing activities.

The project staff initially arranged the meeting appointments with each respondent. The evaluation team then set up online meetings via Zoom platform, Microsoft Teams, and Skype, depending on the channel preferred by the respondent. Plan or the implementing partners set up online group meetings.

The evaluation team interviewed a total of 103 respondents, including 8 at the international level, 53 in the Philippines, and 42 in Indonesia. Appendix C presents the list of KII and FGD participants. Exhibit 4 presents the number of KII and FGD respondents by stakeholder group and gender.

Exhibit 4. Qualitative Sample Size and Characteristics

Stakeholder Group	Total	F	M	Respondents
ILAB	3	3	0	Project Manager, M&E focal point, former Project Manager
Plan US National Office	2	2	0	Project Manager, Senior MERL Advisor
Plan Asia Regional Office (ARO) project staff	3	0	3	Project Director, M&E Officer, Former M&E Officer
Philippines	53	26	27	
Plan Philippines	9	4	5	SAFE Seas staff, including the former National Project Coordinator and Plan Country Office
OND Hesed	6	3	3	Executive Director, staff
National government and SFA members	9	4	1	DOLE, DOJ, BFAR, Greenpeace, MARINA*
Local government and SFA members	21	13	8	Local Government Units (LGU) representatives in Palawan, General Santos, and Sarangani province
Private sector	1	1	0	Tuna Handline Association
Fishers and community in Palawan, General Santos, Sarangani	10	3	7	Fishers and multi-stakeholder fishing council at provincial, municipal and barangay level
Indonesia stakeholders	42	11	31	
YPII (including Project team)	7	5	2	National Project Coordinator (NPC), former NPC, Executive Director, staff
DFW staff	7	0	7	
National level stakeholders (National SFA members)	6	1	5	Including CMMAI, Ministry of Manpower (MOM), MMAF
North Sulawesi and Central Java stakeholders (Taskforce and others)	8	2	6	Government, provincial, district government, vocational school
Private sector	2	0	2	Recruitment agencies
Fishers, family members and trade union representatives	12	3	9	Fishers clients of fisher centers in Bitung and Tegal
Total respondents	103	42	61	

*DOLE (Department of Labor and Employment); DOJ (Department of Justice); BFAR (Bureau of Fisheries and Aquatic Resources, Department of Agriculture; MARINA (Maritime Industry Authority)

Exit Meetings and Stakeholder Meetings. Following the stakeholder KIIs, the evaluation team held online exit meetings with the SAFE Seas teams in Indonesia and the Philippines to discuss the initial findings. The evaluation team presented findings to remote stakeholder workshops via Zoom in Indonesia (November 11, 2020) and the Philippines (November 13, 2020) to present the preliminary findings of the evaluation and to solicit further inputs from stakeholders. De-brief meetings were also held separately with Plan USA and ILAB.

2.2.4 Data Analysis

Data collection methods and stakeholder perspectives were triangulated to strengthen the credibility and validity of the results.

Qualitative Analysis. The evaluation team categorized and synthesized the data captured from the KII and FGD transcripts according to the evaluation questions. The qualitative data summaries were then triangulated with the quantitative and qualitative data obtained from the CMEP reporting to develop the evaluation's findings. During this process, the evaluation team requested further assistance from Plan International to clarify any questions or request missing or additional information.

Quantitative Analysis. Secondary data consisted principally of CMEP monitoring data. The evaluation team analyzed project monitoring data to assess the performance of activities relative to expected results and summarized the latest Technical Progress Report (TPR) reporting of quantitative and qualitative data for comparison with project targets. The evaluation team's analysis of these data was compared and correlated with the findings from the qualitative data collection.

2.2.5 Limitations

The limitations of the evaluation are mainly associated with the challenges of replacing in-person data collection with remote methods. The challenges are listed below with the applied contingency measures.

- Remote KIIs and FGDs did not enable the quality of rapport building that in-person interviewing makes possible. Unobtrusive observation in the project sites was also not possible. For rapport building with stakeholders, the evaluation team carried out online KIIs and FGDs in a way that enabled asking open-ended questions.
- Fewer KII respondents were available in the COVID-19 situation compared to the original in-country plan scheduled for March 2020 when more group KIIs had been arranged with national and local stakeholders, especially in Indonesia. As a result, the team is missing the perspectives of some stakeholders such as the Ministry of Transport in Indonesia, although several senior interviewees nominated other officials in their place. The in-country schedule had included attendance at an SFA Taskforce meeting which was not possible in the remote context.
- Respondents' access to online platforms was an issue in some locations in the Philippines and Indonesia. To address this, the project team assembled several participants for some of the group stakeholder meetings (respondents in Tay Tay municipality and Tegal district), for a videoconference call. This solution was effective, but connectivity throughout the calls remained a challenge. Some individual meetings with fishers were arranged via phone call. For all events where small groups of participants were assembled in a meeting room for online calls the SAFE Seas team and Plan considered the COVID-19 risks and ensured physical distance between participants using separate laptops and personal protective equipment (PPE).
- The evaluation team noted potential bias in the selection of fishing community FGD participants as they were selected by the project team among people who were available to communicate by phone or online platforms, and in Indonesia those who were clients of the fisher centers. It was not possible for the evaluators to select community members randomly from each community given the challenges of convening the participants for online calls, and the nature of community activities that do not have direct beneficiaries. However, not all community participants interviewed were aware of the program, suggesting that the selection was not biased.
- The evaluation used secondary performance information available in semi-annual reports and in available monitoring databases. The evaluation team was not able to check the reliability of performance data given that onsite checks of records was not possible.

3. FINDINGS

This section presents the evaluation findings for each evaluation question, organized according to the evaluation criteria: relevance and coherence¹¹ of the project design and strategy; effectiveness of interventions; effectiveness and efficiency of management, and sustainability, considering the project's experience per country and at cross-country level as appropriate.

3.1 Relevance and Coherence of the Project

This section answers the following questions on the relevance and coherence of the project design and its strategies.

- Q1. To what degree is the project design, theory of change and intervention logic appropriate and adequate to combat FL and human trafficking on fishing vessels in Indonesia and the Philippines?
- Q2. To what extent are the project strategies relevant to the specific needs of project participants, communities, and other stakeholders?
- Q3. To what extent has the project established links and coordinated with government-led efforts to eliminate FL and TIP and with other donor-funded interventions?

3.1.1 Validity of the Project Design

Question 1: To what degree is the project design, theory of change and intervention logic appropriate and adequate to combat FL and human trafficking on fishing vessels in Indonesia and the Philippines?

Country context and site selection. In discussing the validity of the project design, it is important to consider the country selection and context of FL/TIP. Indonesia was pre-selected for the project in the FOA, based on the well-documented incidence of cases of FL and TIP among fishers. The Philippines was chosen by Plan from several countries listed in the FOA. The SAFE Seas Pre-Situational Analysis and other research reports provide evidence that the Philippines and Indonesia have incidences of FL and TIP, but the structure of the fishing industry is different in the two countries. Indonesia has a larger proportion of fishers working long distance and on foreign flag fishing vessels, while the Philippines has proportionally more municipal and artisanal fishing.¹² Addressing both artisanal and commercial fishing sites at the sub-national level makes for a large scope as the employment patterns and risks of labor abuse are different.

Fishers in both countries experience labor exploitation and risk of trafficking as defined by the ILO indicators of FL,¹³ but given the selection of the Philippines, a more strategic approach may have been to focus on major ports and labor sending sites engaged in commercial and long distance fishing, where there is more evidence of labor exploitation, rather than in the artisanal fishing sector which makes up the main type of fishing in Palawan and municipal sites. Nevertheless, the evaluation team finds that the project has also proven relevant to the issues for fishers in the artisanal and municipal fishing sector in Palawan and Sarangani.

Validity of designed strategies and theory of change per country. The SAFE Seas project design is based on an analysis presented in the project document of the nature of labor abuse among fishers in Indonesia and the Philippines and the needs and challenges in addressing FL

¹¹ The evaluation criterion, "coherence", was added to the OECD-DAC evaluation criteria in 2019. It refers to the fit of the intervention with external efforts of governments and other development partners and the fit with the implementing agency's program.

¹² SAFE Seas Pre-Situation Analysis. 2019; Verité. (2016) Research on Indicators of Forced Labor in the Supply Chain of Tuna in the Philippines. Funded by the US Department of Labor.

¹³ ILO defines FL according to 11 indicators. https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf

and TIP in each country. The nature and extent of the problems was elaborated in the Pre-Situational Analysis. In Indonesia, fishers' labor abuse is documented among fishers on domestic and foreign flag vessels. In the Philippines, the project's analysis highlights child labor in fishing in artisanal and small scale commercial fishing fleets where children work with family members, and FL associated with IUU fishing out of General Santos, where many of the fishers are unregistered, leaving them open to abuse. The Philippines NPC observed that further data collection is needed in the Palawan sites to determine the prevalence of child labor.

The key factors that the project aims to address are summarized as:

In Indonesia:

- The regulatory framework of laws and policies exists, in line with C.188, but is not harmonized¹⁴
- Multiple jurisdictions of the agencies with mandate to inspect fishing vessels and their procedures are not harmonized and lack of inspection resources
- The private sector recruitment agencies for foreign flag vessels frequently disregard laws
- Fishers are not aware of their rights, and the wider public is likewise unaware, allowing employers to take advantage¹⁵
- Systems of reporting remediation are underdeveloped

In the Philippines:

- The legal and regulatory structure addressing fishers' conditions exists and is aligned with ILO C.188, but is poorly enforced and not accepted by all stakeholders
- Lack of institutional capacity and procedures for monitoring, inspection, and enforcement among multiple agencies with relevant mandates
- Lack of systematic documentation of cases of labor exploitation and FL/TIP
- Lack of policy to provide incentives to encourage good labor practices
- Vulnerability of fishers and their lack of awareness of their rights together with a lack of broader societal awareness (fishers in both commercial and artisanal fishing accept debt bondage as the "norm")
- Lack of effective grievance reporting and remediation services

This analysis of contributing factors and gaps is quite comprehensive, but it does not explore the factors in non-compliance among the fishing industry employers.

The project's general theory of change was established by the FOA (FOA-ILAB-17-04) in setting the project objective, outcomes, and supporting outcomes.¹⁶ Plan's proposal followed this design with some adaptation under implementation and the subsequent CMEP development. Under the theory of change the intervention strategies are divided into two clusters: those aimed at improving the governance of fishers' protection, through harmonization of rules, institutions and coordinated enforcement procedures (Outcome 1); and those aimed at improving the prevention

¹⁴ The Ministry of Marine Affairs and Fisheries (MMAF) established *Satuan Tugas 115* (SatGas 115) – a task force to combat IUU fishing in 2015. However, it did not include human rights violations on fishing vessels. In addition, the same ministry issued Regulation No.35 (2015) System and Human Rights Certification on Fisheries, and Regulation No.2 (2017) on Required Human Rights Certification on Fisheries as an effort to address violations of fishers. The application of these initiatives are still works in progress by the Government of Indonesia according to the SAFE Seas Project Document.

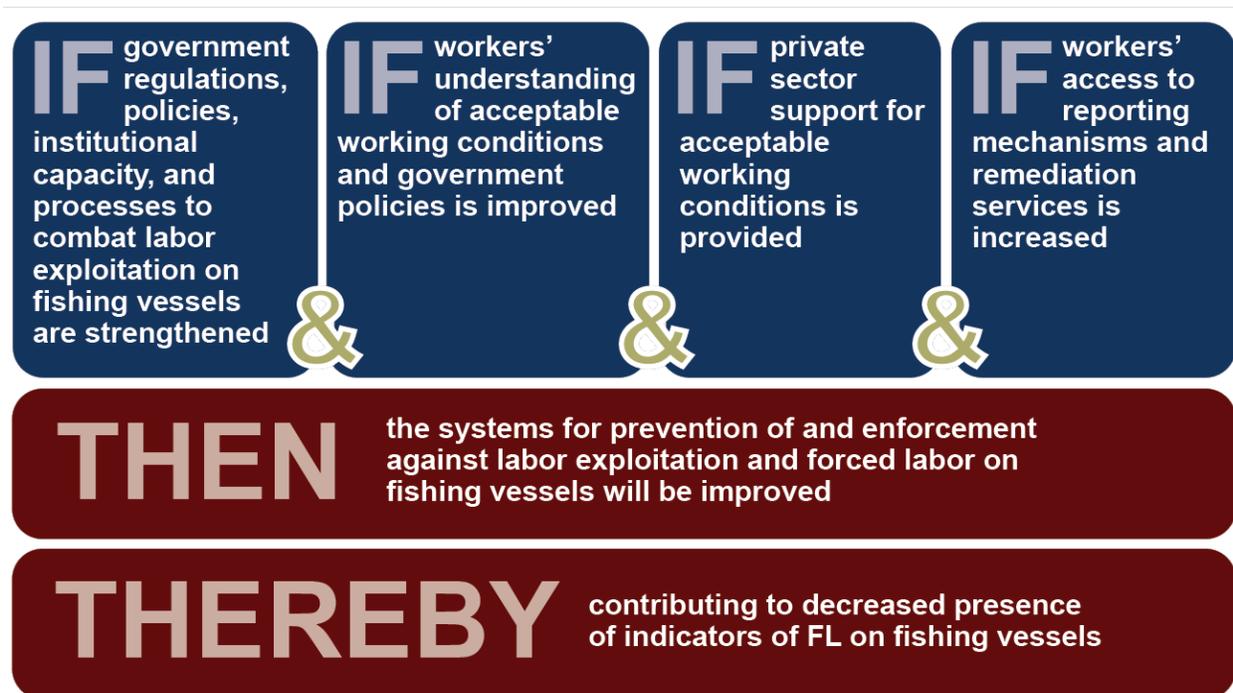
¹⁵ The evaluation notes that the dynamics of vessel owners and workers are less clear-cut in the context of artisanal fishing on smaller vessels in the municipal waters, where vessel owners themselves are subject to financial pressures.

¹⁶ This was based on an analysis of the factors contributing to FL and TIP in the Asia Pacific and specific research in Indonesia.

of fishers exploitation through multi-stakeholder awareness of fishers rights and their access to remediation services and legal redress (Outcome 2).

The Project Document (version updated October 2019, p.15) states the TOC or causal logic as a results chain, as shown in Exhibit 5:

Exhibit 5. SAFE Seas Results Chain



This is an adapted version of the formulation in the Project Document. The private sector's understanding and acceptance of the regulations on fishing work is not mentioned in the project document version of the results chain, but we have included it in the logic, as the project document highlights the need for private sector support and it is also included in the results framework through two outputs leading to SO 2.1.

The results framework that was derived from this TOC, to serve project planning, M&E, proposes two supporting outcomes toward improved enforcement (SO1.1: Regulatory and policy change and SO1.2: Improved inspection on fishing vessels) and three framed toward reduced indicators of FL and TIP (SO 2.1: Improved awareness among government, fishers, and private sector; SO 2.2: Improved access to reporting; and SO2.3: Improved access to remedy services).

The evaluation concluded that the scope of the invention strategies encompassed in these five supporting outcomes--essentially four pillars, where reporting grievances and access to remedy go hand in hand--is appropriate to address the factors contributing to FL and TIP among fishing vessel workers in each country. Each of the sub-outcomes is considered relevant and necessary to addressing the contributing gaps and factors in Indonesia and the Philippines. In both countries, the legal framework exists for protection of fishers' labor conditions but requires greater harmonization. Similarly, the aim of bringing about labor inclusive inspection, and harmonization among inspection agencies is valid in Indonesia as well as the Philippines. The strategy of increasing fishers' awareness is important to improve the situation because, in both countries, fishers have traditionally lacked knowledge of their rights and how to protect them. Note that under implementation, the five sub-outcomes are often presented as three main groupings

corresponding to the intended thematic grouping of the advisory groups: 1) regulations and policy; 2) inspection; and (3) awareness, reporting, and remedy.

The evaluation found that the private sector strategies are a weaker point in the overall intervention logic and theory of change as put forward in the Project Document. Raising awareness of the laws and fishers' rights among fishing companies and recruitment agencies is expected to contribute to changing exploitative practices, but in the long term a wider range of strategies is likely needed to influence safe practices, when commercial considerations weigh against abiding by the laws in terms of contracts, payment arrangements, and insurance. The design includes, but does not place a major emphasis on, strategies to change the practices of the private sector. The assumption, indicated in the Project Document, that the private sector fishing industry would see the win-win benefits and partner with the government to improve fishers' conditions was overly optimistic and in practice, the project has witnessed considerable opposition to changes in fisher employment and recruitment practices in both countries.

Given the contentious nature of fishing labor practices, a more cohesive and multi-pronged approach will be needed to change private sector practices, including supply chain pressure. However, within the resources available across two countries, the project's efforts to improve understanding of the regulations are an important step toward self-regulation and compliance. As will be discussed in assessing the project's effectiveness, SAFE Seas is paying increasing attention to engaging with the private sector going forward.

SAFE Seas' overarching approach elaborated by Plan of bringing stakeholders together through multi-stakeholder forums at the national and sub-national levels to discuss policies and drive the project as a whole was found appropriate to the context in each country, where tripartite and civil society consultative processes are the norm.¹⁷

The causal logic presented in the project's Results Framework contained in the CMEP and the Project Document, which organizes the outcomes and outputs for the purposes of implementation planning and performance monitoring and evaluation, is not completely coherent.¹⁸ The formulation of Outcome 2 (*Decreased indicators of labor exploitation including FL/TIP on fishing vessels*) more accurately represents an indicator for the overall project objective of combating FL and TIP among fishers, and would also be the expected outcome of improved enforcement procedures. This formulation was inherited from the FOA and not adjusted by Plan during the CMEP process. The formulation of the outcome and its sub-outcomes has some implications for the evaluation of the changes intended by the project, as discussed in Section 3.3.2. However, this structure does not diminish the validity of the strategies associated with each of the sub-outcomes.¹⁹

Model building/piloting: The SAFE Seas selection of the province and district/municipality sites is intended to bring about change in these selected locations, and also to serve as models for replication elsewhere in the country. To this end, the evaluation team considers that there should

¹⁷ The lead evaluator noted that the original FOA design and project proposal included a third supporting outcome for Outcome 1 - Formation of multi-stakeholder advisory groups. This was dropped during the CMEP process as it was found to be duplicated in different parts of the results framework, and it is also a crosscutting strategy, not only serving Outcome 1. It is maintained at activity level in the project's results framework (see discussion in the M&E section of the report).

¹⁸ ILAB's current guidance for results frameworks can be found in its guidance resources:
https://www.dol.gov/sites/dolgov/files/ILAB/ME_Resource_Guide_for_OCFT_Projects_Final.docx

¹⁹ The logic of the results framework could have been better arranged for the purpose of evaluation and monitoring. See Section 3.3. An alternative logical structure to differentiate the results more clearly would have been proposing three high-level outcomes such as: 1) improved enforcement of protection of fishers' working conditions; 2) improved awareness of acceptable working conditions on fishing vessels among fishers and the fishing industry and 3) improved access of fishers to reporting and remedy in cases of grievance/labor exploitation.

be outputs and activities related to the documentation of the remediation services and any other key models introduced by the project.

Regional elements of the design: The design includes valuable regional activities such as networking and information exchange with regional forums on fishers' rights, as well as production of knowledge products including a regional stakeholder mapping and gender research conducted in the Philippines by the Plan ARO. However, a lack of regional outputs in the project results framework could be addressed in the CMEP (see Section 3.3.2).

3.1.2 Relevance to Stakeholder Needs

Question 2. To what extent are the project strategies relevant to the specific needs of project participants, communities, and other stakeholders?

Indonesia

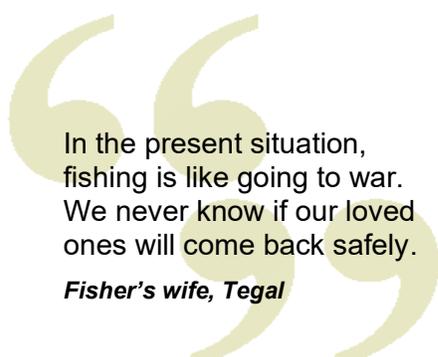
Government stakeholders: In Indonesia, the project is well aligned with the government's ongoing efforts to protect the human rights of fishers, led by the CMMAI and MMAF, especially in the years following the 2015 case of forced labor among migrant fishers uncovered in Benjina and Ambon in eastern Indonesia. The Government of Indonesia's recognition of the need to protect fishers' labor rights is demonstrated in three regulations issued by the MMAF (Regulation No. 35/2015 on Human Rights Certification in the Fishery Industry, Regulation No. 42/2016 on the Sea Working Agreement and Regulation No 42/2017 on Human Rights Certification System and the Fishery Industry). However, overlapping jurisdictions and regulations exist with those of the Ministry of Transportation (MOT) and the Ministry of Manpower (MOM), along with a recognized need to harmonize regulations as well as operational implementation. The evaluation interviewees from national government, representatives of the CMMAI and the MMAF see the project as highly relevant in supporting their efforts in harmonization of policies, and multi-agency collaboration in enforcement of labor conditions on vessels. National government evaluation respondents noted that the key government ministries are not accustomed to working in collaboration and the project's efforts have paid off in bringing them all to the same table.



I am impressed that through this project all the parties can work together.

Ministry Representative

Subnational stakeholders: Among line ministries at the provincial level, those in Bitung, North Sulawesi find the project relevant to their needs in developing harmonized operations for vessel inspections, and the need to protect fishers is well recognized. In Central Java, the reception of the project has been more mixed. The Department of Fisheries, as well as the Department of Transportation, find the project very helpful in raising their knowledge of FL/TIP and helping them realize that it is an issue under their jurisdiction. However, the provincial governor is not yet engaged.



In the present situation, fishing is like going to war. We never know if our loved ones will come back safely.

Fisher's wife, Tegal

Fishers and fishers' associations: Fishers' associations such as the newly formed fisher labor union in Bitung, known as *Serikat Awak Kapal Perikanan Bersatu Sulawesi Utara* (SAKTI), find the SAFE Seas project highly relevant to their interest in increasing fishers' awareness of their rights and access to complaints channels. The evaluation team met individual fishers and family members from

Bitung and Tegal who highlighted the plight of many fishers who work on foreign flag vessels and long-distance domestic fishing.

The fishers from Bitung and Central Java alike expressed how much they value the newly established fishers center. See further discussion in Section 3.2: Effectiveness of the Interventions.

Private sector: The fishing companies and recruitment agencies in North Sulawesi and Central Java were reportedly initially suspicious of the aims of the project but have gradually become more supportive of project activities according to project reports and project staff interviews. The representative of a large fishing company, which operates private ports in Bitung, with fishing grounds around North Sulawesi, noted that there is a growing need to meet labor standards as they begin to sell to overseas markets. He recognized the need for guidance on government regulations on fishers' employment conditions. The company participated in the project joint inspection exercise by allowing the team to access their vessels. However, the representative was still unclear about what further engagement by the project is planned. A representative of the Indonesian Fisherman Manning Agents Association (IFMA) in Central Java, which recruits fishers predominantly for Taiwanese and Chinese vessels, noted that the information provided by the project via training events is highly relevant to inform recruitment companies' members of the legal requirements for recruitment. He admitted that there are some "notorious" agencies, but there are others willing to do the right thing.

Philippines

National stakeholders: In the Philippines diverse national level stakeholders interviewed by the evaluation team expressed their support for the SAFE Seas project and its specific strategies. Representatives of DOLE's Bureau of Working Conditions (BWC) appreciate that the project helps to bring the key agencies together, especially the Bureau of Fisheries and Aquaculture Resources, to support the inspection effort, as DOLE's resources are limited. The BWC would like to see greater efforts to bring BFAR on board. The BWC also appreciates SAFE Seas' effort to reach the private sector in General Santos with an approach of "helping each other" and reducing hostility in relation to DOLE's regulations.

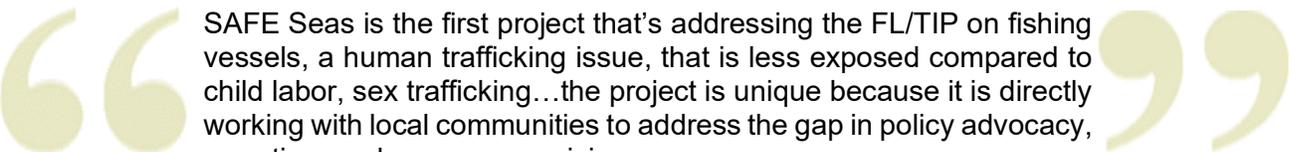


The project has a foothold in General Santos where industry relations have been difficult.

DOLE/Bureau of Working Conditions

BFAR representatives from the Fisheries Observer Program (FOP), expressed that they recognize the need to collaborate on fishers' working conditions, and appreciate the training on FL/TIP indicators provided by the project.

DOJ, as the chair of the Inter-Agency Council against Trafficking (IACAT), and the Netherlands Embassy, chair of the Technical Working Group (TWG) on Seafarers and Fishers, appreciate the project's support to inter-agency cooperation on the issue. According to a senior DOJ representative:



SAFE Seas is the first project that's addressing the FL/TIP on fishing vessels, a human trafficking issue, that is less exposed compared to child labor, sex trafficking...the project is unique because it is directly working with local communities to address the gap in policy advocacy, reporting, and awareness raising.

On the other hand, a MARINA representative, who has been in the role since 2019, was not well informed about the project, suggesting the need for strengthened networking with MARINA officials at different levels.

Subnational: The evaluation heard strong expressions of buy-in from a variety of municipal members of the local and provincial IACATs. They expressed that fisher folk are among the poorest sector in the Philippines, and that this stems from their exploitative working conditions. In particular, representatives of the Office of Social Welfare and Development, Office of Sustainable Development, Office of Tourism in Tay Tay and Puerto Princesa support the project's efforts to raise awareness on the rights of fishers. The representatives noted the risk of trafficking in the seas bordering Malaysia. In General Santos, representatives of MARINA and the City Fisheries and Aquatic Resources Management Councils (FARMCs) appreciated the project bringing the different stakeholders together to address fishers' issues. There is strong support for the project implementation at the local level. As observed, the engagement of local government units in Palawan has resulted in achieving conduct of a trial joint inspection on fishing vessels using a joint inspection checklist. However, local executive support is varied.

Fishers and fishers' associations: The evaluation noted that the city and local FARMCs, which represent fishers' interests, welcomed the support of the project, highlighting that fishers themselves accept debt bondage and poor conditions as part of their normal life. The representatives of the Barangay FARMCs (BFARMCs) in Tay Tay, Puerto Princesa, and General Santos expressed differing concerns. In General Santos the most prominent concern is with fishers' detention in Indonesia. They appreciate OND and Apostleship of the Seas' (AOS) assistance to repatriate fishers from Indonesia. In Palawan, there is a concern about fishers' poverty level, the poor returns from commercial fishing, lack of social and health insurance, and debt bondage. There are also concerns with the ban on compressor diving fishing²⁰ because fishers have no alternative gear. Fishers' wives appreciated SAFE Seas' role in raising their understanding of fishers' rights.

Private sector: The evaluation learned that the private sector in Mindanao through the SOCCSKSARGEN Federation of Fishing and Allied Industries (SAFFAI), has been generally receptive to the project, though the team did not have the opportunity to interview a representative.²¹ The representative of the Tuna Handline Association has been open to joining SAFE Seas seminars, but generally, the sector continues to hire workers without contracts, as "passengers" and the relationship with the private sector remains challenging to negotiate.

3.1.3 Coherence with Government and Donor Efforts

Question 3. To what extent has the project established links and coordinated with government-led efforts to eliminate FL and TIP and with other donor-funded interventions?

As discussed earlier, coordinating with government-led efforts to eliminate FL and TIP in fishing is the backbone of the SAFE Seas intervention, especially for Outcome 1, where it addresses policy and government enforcement systems, but also under Outcome 2 where community linkages with government and other remediation channels are strengthened and government policies are discussed and promulgated.

In Indonesia, USDOL consulted with the relevant government ministries in the initial conception of the project. The key coordinating ministry, CMMAI, and the MMAF welcomed the project from its inception. Under implementation SAFE Seas has supported government efforts by assisting the formation of a multi-sector, tripartite and civil society taskforce, chaired by the CMMAI, to drive

²⁰ Known as 'Pa'aling', the use of a compressed air pipe for fishing with a hand spear, a dangerous method that has been banned in the Philippines.

²¹ Acronym refers to the South Cotabato, Cotabato, Sultan Kudarat, Sarangani, and General Santos region.

the policy and capacity building agenda on enforcement of fishers' rights and improving the regulatory framework. The project complements the ILO's continuing work on regional fisher advocacy networks that were initiated under the ILO's SEA Fisheries project which concluded in 2020. The ILO is a participant in the Indonesia SFA/National Team. SAFE Seas also builds upon the efforts of the International Organization for Migration (IOM) which has also documented the regulatory framework and identified the need for harmonization of enforcement efforts.

The project also aligns with Indonesia's National Task Force to Combat IUU Fishing (SATGAS 115 team) to combat trafficking in persons on fishing vessels. SAFE Seas supports emerging voices among government and other stakeholders advocating for the ratification of the ILO Convention 188, while the project does not directly advocate for ratification within its lifetime.

In the Philippines, the project established working agreements via memorandum of understanding (MOU) with DOLE and memorandum of agreement (MOA) with MARINA, and established an agreement with the DOJ, which is the convener of the IACAT in Persons in the Philippines, for the project to be adopted by the IACAT. SAFE Seas has broadened the government membership of the IACAT TWG on seafarers and fishers to include more departments and civil society organizations such as Greenpeace. The project assists in socializing the key government regulation on protection of fishers' working conditions represented in the DOLE Department Order 156-16.²² The Embassy of the Netherlands is the chair of the IACAT TWG on seafarers and fishers, and the project complements the Netherlands' efforts. At the subnational level in General Santos and Palawan, SAFE Seas also works closely with government and non-government members of the provincial and local levels of IACATS: Provincial IACATS (PIACATS) and Local IACATS (LIACATS).

At the regional level, the ILO, IOM and UNDP recently launched the *Ship to Shore Rights Project* in seven ASEAN countries including Indonesia and the Philippines, (2020-2024) which offers an ongoing opportunity for collaboration.

3.2 Effectiveness of Interventions

This section presents the evaluation findings regarding SAFE Seas' progress toward its objective and planned outcomes in Indonesia and the Philippines, and at the cross-country level. The analysis incorporates the project's performance against its indicator targets listed in the CMEP and discusses the contributing factors and key results from various stakeholders' perspectives. The analysis addresses the following evaluation questions:

- *Question 4: To what extent is the project making progress towards its primary objective and planned outcomes? What are the key results achieved so far regarding each of the sub-outcomes?*
- *Question 5: What are the key internal or external factors that limit or facilitate the achievement of project outcomes?*
- *Question 8: To what extent has gender mainstreaming been addressed by the project? Has the project integrated gender equality as a cross-cutting concern throughout its methodology and all deliverables?*

3.2.1 Indonesia

Indonesia's project start was delayed by around 8 months, from the award in November 2017 until approval in September 2018. The SAFE Seas launching event was held in November 2018; effectively the project has been operating for 2 years. One of the factors hindering the approval was Plan International Indonesia's transition from an international entity to a local Indonesian institution, YPII and delay in the government's approval of the organization to implement the

²² DOLE Department Order 156-16 on Rules and Regulations governing the Working and Living Conditions of Fishers on board Fishing Vessels engaged in Commercial Fishing Operation.

project. As a local organization, YPII is under the management of the Ministry of Home Affairs, while the project was originally approved by the Ministry of Foreign Affairs. With the support of the CMMAI, YPII eventually received government approval to implement the project. The sub-grantee, DFW, commenced in late June 2019 (the partnership agreement was executed in August 2019), effectively in operation for 17 months at the time of the interim evaluation.²³

Despite the delayed start, SAFE Seas Indonesia has made strong progress on Outcome 1 and relatively good progress on Outcome 2, where some activities have not commenced yet. Indonesia has made strong progress toward Outcome 1 at the national level through the completion of a draft *National Action Plan (NAP) for the Protection of Seafarers and Fishers on Fishing Vessels*, bringing it on track toward targets at national level. At the provincial level, progress has been stronger in North Sulawesi where the project-initiated safe fishing advisory bodies are endorsed by the province governor and operating well. The government agencies, with the support of SAFE Seas, are working toward a nationally accepted multi-agency inspection procedure and checklist, but the development is still in its infancy. Key players at the national level have accepted the principle of joint or multi-agency inspection and a trial inspection was conducted in Bitung in North Sulawesi, with plans agreed for further joint inspections in Jakarta. Under Outcome 2, Indonesia has progressed well with the creation of two local fishers centers serving information and reporting needs of fishers and their family members, as well as capacity building for private sector recruitment agencies. The following discussion examines the achievements and challenges for each of the sub-outcomes, incorporating the project's reported indicator results. Appendix A presents the project's performance on the full set of CMEP indicators.

Outcome 1. Improved enforcement to combat labor exploitation on fishing vessels

At the outcome level, Indonesia is on track toward the Outcome 1 milestone achievement for the period ending September 2020, with the achievement of a multi-disciplinary trial inspection in Bitung port in September 2020. However, the project has a distance to cover to achieve Milestone 3 by September 2021. We discuss the progress toward improved inspection further under Sub-outcome 1.2.

Exhibit 6. Achievement of Outcome 1 Milestone - Indonesia

Target milestone 2 (October 2019–September 2020): The key government agencies agree to conduct labor inspection trials on fishing vessels.

Achievement: Trial multi-stakeholder inspection was conducted in Bitung port, in September 2020, led by the Ministry of Manpower Office.

Milestone 3 (October 2020 – September 2021): The related government stakeholders receive improved labor inspection procedures or tools, which include labor exploitation indicators including FL/TIP

Sub-Outcome 1.1 Regulatory and policy framework to combat labor exploitation on fishing vessels

Progress in establishing the SFA. The central strategy for driving the project's regulatory and labor inspection efforts is the creation of a SFA, locally named the *National Taskforce on Fish Workers Protection*, bringing together key government, private sector representatives, workers' representatives, and civil society institutions, to guide improvements across the range of the project interventions. This group is intended to act as an advisory group for implementing all project activities on fish workers' protection for the duration of the project, and to continue beyond the life of the project. Exhibit 7 shows the performance on the relevant indicator.

²³ The original partner proposed by Plan in Indonesia, labor rights group Kiara (People's Coalition for Fisheries Justice), did not meet ILAB eligibility as it is not a fully registered organization.

Exhibit 7. Progress in Establishing Safe Fishing Alliance (SFA) in Indonesia

Indicator 1.1.1 Number of advisory groups created to drive the project	Progress and Evaluation Comment
<p>End of Project Target and October 2020 Target: 10 Achievement: 10</p> <p>Note: The target represents four groups at the national level and three advisory groups in each province</p>	<ul style="list-style-type: none"> ▪ Good progress at national and subnational level ▪ Established at national level in 2019, and two at provincial level in North Sulawesi and Central Java. ▪ Formation is strongest in North Sulawesi where it is seen as a need of the stakeholders to have a platform for sharing discussion. ▪ The group is not yet operational in Central Java due to lower LGU priorities. ▪ SFA efforts to bring the parties together are praised by National and Provincial stakeholders.

The National Project Coordinator (NPC) (in office until taking leave in February 2020), supported by the PD, worked toward this goal from the project start in September 2018. The National Team, as it is known in Indonesia, was formed in February 2019. The SFA is chaired by the CMMAI. During February to August 2019, the taskforce met several times to formalize the structure and the workplan. Significantly, the SFA structure is signed by the government through the Deputy Minister, which gives the SFA a legal status and an assigned budget.

As noted earlier, government respondents from the CMMAI and the MMAF met by the evaluation team highlighted that bringing together the three key government agencies--MMAF, MOM, and Ministry of Transportation--to work together to address fishers' protection issues was a major achievement given that these agencies usually work separately under their own mandates. Such an interagency coordination group is the key for multi-disciplinary inspection, but also for other governance issues related to fishers' protection. Various respondents credit this success to SAFE Seas' advocacy strategy, the interest and commitment of the leadership of CMMAI, as well as the SAFE Seas provision of funds for meetings. The wider membership of the SFA consists of the ILO, IOM, and civil society groups.

At the local level, the Indonesia project team has also successfully established the SFA, locally known as a forum, in North Sulawesi in October 2019, and in Central Java in December 2019. The groups' membership in North Sulawesi includes 14 government representatives, education institutions, and two private sector institutions. The evaluation team learned from the project staff that progress and engagement has been stronger in North Sulawesi where the fishing industry focuses around the port in Bitung, and where the government agencies are keen to address issues of fishers' protection. In Central Java, the provincial government attention has recently focused on industry resistance to the ban on trawler fishing, rather than protection of fishers. An advisor to the provincial governor in Central Java interviewed by the evaluators suggested that the project needs to advocate more intensively with the Central Java government for the operation of the SFA, providing factual evidence of the issues in the form of case data. Another factor that has likely contributed to the progress in Bitung, North Sulawesi is DFW's longer history working there compared with the Central Java localities.

Progress toward regulatory and policy improvements. As part of the working agenda of the national SFA taskforce, with SAFE Seas' support, the national team developed a workplan, finalized in August 2019. The scope was organized along the lines of policy improvement, inspection, and awareness and access to reporting and remedy. As a significant outcome, the CMMAI requested SAFE Seas' assistance to transform the SFA workplan to serve as the basis of a national plan of action. After a series of virtual and offline consultations the draft NAP for the Protection of Seafarers and Fishers for 2020-2024 was finalized in September 2020. The government ownership of the draft is clear in that the CMMAI led and funded all meetings related

to the NAP from May to September 2020. The NAP includes a wide-reaching agenda of policy and regulatory harmonization for the sector. An academic draft is currently under preparation, as required by Indonesian government processes, to support approval of the NAP when submitted to the president in 2021.

Indonesia SAFE Seas reports the results for policy and regulatory improvements to date as shown in Exhibit 8.

Exhibit 8. Progress toward Regulatory and Policy Improvement

Indicator	Progress and Evaluation Comment
<p>SO1.1a. Number of policies, regulations, or implementation guidelines created and disseminated with project assistance</p> <p>End of project target: 3 October 2020 target: 2 Actual October 2020: 1</p>	<ul style="list-style-type: none"> Tangible progress counted so far is limited to the approval of a letter on COVID-19 prevention for fishers, issued by the MMAF The more significant progress is the drafting by the National team of a National Action Plan on Protection of Seafarers and Fishers for the period 2020 – 2024. This comprehensive plan covers policy harmonization, inspection, and remedial processes, but it will not be counted in the project performance reporting until it is fully approved.
<p>SO1.1b. Number of regional and local regulatory frameworks aligned with national frameworks</p> <p>End of project target: 3 October 2020 target: 1 Actual October 2020: 1</p>	<ul style="list-style-type: none"> A governor decree approving the SFA in North Sulawesi and including the role of the working group members was counted toward achieving regional regulatory frameworks aligned with national regulatory frameworks (Achieved in April 2020)

Sub-Outcome 1.2. Quality of Labor-Inclusive Inspections on Fishing Vessels

As reflected in the project’s narrative and indicator reporting Indonesia is making steady progress towards establishing multi-agency procedures and capacity for labor-inclusive vessel inspections, but only one province has trialed a joint inspection so far. The training of labor inspectors planned in the October 2020 reporting period is currently delayed due to COVID restrictions. As shown in Exhibit 9, as of the project has met its quantitative target of one joint inspection, but the benchmark level is low. The evaluation interviews with project staff and government stakeholders indicated that the process of establishing a system and accepted protocols is still in its infancy, as explained below. Exhibit 9 summarizes the results as of October 2020.

Exhibit 9. Progress toward Labor-Inclusive Fishing Vessel Inspection

Indicator	Progress and Evaluation Comment
<p>SO1.2. Number of joint inspections conducted by members of interagency groups</p> <p>October 2020/EOP target: 1 Actual October 2020: 1</p>	<ul style="list-style-type: none"> Target achieved. The project facilitated the trial joint fishing vessel monitoring inspection in Bitung Port in North Sulawesi, September 2020. Another trial planned for Jakarta port is delayed by the COVID lockdown. It should be noted that the indicator target is set low level (1 joint inspection) and does not distinguish between trial processes and implementation of revised and accepted protocols.
<p>OTP 1.2.1 Number of recommendations produced by SAFE Seas Project to improve labor inspection</p> <p>October 2020/EOP target: 7 Actual October 2020: 10</p>	<ul style="list-style-type: none"> Exceeded project target. The recommendations produced by the SAFE Seas project have been agreed by the Director and Deputy Director at the Ministry level within the SFA.

Indicator	Progress and Evaluation Comment
OTP 1.2.3 (a) Number of inspectors who completed training on FL/TIP	<ul style="list-style-type: none"> ▪ Training of inspectors planned for completion by October 2020 delayed due to COVID disruptions

The project's strategy toward supporting joint or multi-disciplinary inspection procedures and guidelines is to work in parallel at the national and provincial levels. Indonesia has a decentralized administration for labor inspection (as does the Philippines) and the national level can set the policies but not direct the provincial level, so the policies and operational procedures need to be discussed simultaneously at the province and national level. During late 2019, the project held a series of meetings with the government stakeholders at the national and provincial levels. The consultations resulted in a 10-point set of general recommendations, agreed by representatives at the SFA, regarding the way forward toward on-vessel and multi-agency labor inspections. Considerable policy challenges remain in that the fishers on Indonesian vessels are considered as informal workers and outside the mandate of the MOM labor inspectorate.

At the provincial level, DFW has supported development of joint inspections initially through a policy brief on multi-agency inspections submitted to the provincial governments of North Sulawesi and Central Java in May 2020. The briefs presented the rationale and recommendation to conduct joint inspections and to strengthen information sharing between the authorities. A significant milestone achievement is the trial vessel inspection process carried out in Bitung oceanic port in September 2020. The inspection took place in four ports in Bitung owned by fishing companies where all private fishing vessels operate. The inspection was led by the provincial office of Manpower, and included the MMAF and the port harbor master. The inspection was followed by a review and revision to the inspection checklist under development. A representative of the Bitung Port Authorities, under the MMAF, met by the evaluation team was very positive about the process and outcomes. The SAFE Seas NPC noted that ILO has also trialed a vessel labor inspection checklist, but it was more externally developed whereas the current checklist has been developed by the national stakeholders and therefore seems to be more acceptable in Indonesia.

The national stakeholders are waiting for the Jakarta trial to be carried out before progressing to formulating a nationally applicable system, though the trial will depend on COVID restrictions. Concurrent with the preparation of this report, SAFE Seas recruited two international consultants tasked respectively to support the stakeholders to progress their policy and operational guidelines for coordinated vessel inspection in both Indonesia and the Philippines.

Outcome 2. Decreased indicators of FL/TIP among fishing vessel workers

Indonesia has made good progress toward increased awareness among most stakeholder groups and improved reporting and remedy services, relative to its planned outputs and indicators. However, a number of outputs related to the reporting and remediation services are delayed due to COVID-19. Exhibit 10 shows the outcome level results in October 2020.

Exhibit 10. Outcome Level Progress on Outcome 2

Indicator	Progress and Evaluation Comment
OTC 2a. Percent of fish workers who understand the meaning of FL/TIP April 2020 target: 50% End of project target: 70% Actual April 2020: 4%	<ul style="list-style-type: none"> ▪ February to April 2020 survey results represent the baseline as it is the first survey conducted. ▪ Indonesia survey reported only 5/120 respondents knowledgeable of FL/TIP indicators. ▪ Survey delayed from October 2019

Indicator	Progress and Evaluation Comment
OTC2b. Number of fish workers reporting seeking FL/TIP services or referrals after receiving SAFE Seas campaign information October 2020 target: 5 End of project target: 35 Actual October 2020: 34	<ul style="list-style-type: none"> ▪ Exceeded target. ▪ 39 fishers' grievance cases lodged at the 2 centers in North Sulawesi and Central Java, while 34 have been fully verified.

The 2020 fisher workers survey currently shows a low rate of awareness of FL and TIP, but as discussed later it is not a particularly sensitive gauge of the nature and extent of change in awareness. This survey conducted in early 2020 is used as the project's baseline for measuring awareness. Through the fisher centers, SAFE Seas Indonesia has already exceeded its target for the number of fish workers seeking support services.

Sub-Outcome 2.1 Awareness of fishers, private sector, and government improved

Toward Sub-outcome 2.1, the Indonesia team has undertaken diverse strategies including introducing early detection activities at the community level to help prevent exploitation, awareness raising with fishers' associations, through sessions at vocational training institutes serving fishers, and with private sector recruitment agencies. At the community level, awareness-raising efforts are also linked with the fishers centers as discussed below. Exhibit 11 summarizes the results against the indicators for this sub-outcome.

Exhibit 11. Progress on Awareness among Community, Private Sector & Government

Indicator	Progress and Evaluation Comment
SO2.1 Number of government agencies with policies/ordinances adopted End of project target: 2 agencies	The target is set for 2021. The evaluator notes that the sub-outcome indicator is limited to reporting on government awareness, rather than that of the private sector or other actors.
OTP 2.1.1 a. Number of private sector fish companies that sponsor FL/TIP trainings for their fish workers October 2020 Target: 5 End of project target: 10 Actual (April 2020): 13	<ul style="list-style-type: none"> ▪ Activities postponed due to the COVID-19 pandemic. ▪ Focus has been on training/seminars for the recruitment companies themselves, rather than their workers
OTP 2.1.1 b. Number of workplaces that display materials on indicators of FL/TIP and contact information in public view October 2020 target: 10 End of project target: 10 Actual October 2020: 15	<ul style="list-style-type: none"> ▪ Exceeded target. 15 sites displayed IEC materials on FL/TIP in fishing
OTP 2.1.2 Number of stakeholders that attend presentations on the MAST initiative in Indonesia October 2020 target: 15 End of project target: 45 Actual: October 2020: 0	<ul style="list-style-type: none"> ▪ Not achieved. Activity delayed due to COVID-19 restrictions.
OTP 2.1.3 Number of communities with early detection plans in place October 2020/End of project target: 2 Actual October 2020: 0	<ul style="list-style-type: none"> ▪ These community plans are intended to contribute to awareness of rights and reporting of grievances. DFW initiated the early detection plans, but they are not in place yet.

National level awareness. Indonesia SAFE Seas has rapidly moved to online methods of raising awareness with a series of webinars conducted during 2020. One example is a virtual public discussion on “Protecting Fishers from Human Trafficking and COVID-19” on the World Day Against Trafficking in Persons on July 30, 2020, with the participation of a panel including CMMAI, MMAF, and ILAB.

Fishers, CSOs, associations. DFW has delivered awareness raising campaigns in the Bitung port area, posting materials onboard vessels and around the port; as well as in villages in Tegal and Pemalang, distributing IEC materials, and working with the village office leaders. The project created an animated music video published in July 2020, available on YPII’s YouTube channel with a total of 186 views in October 27, 2020.²⁴ The video has been used at the field level to disseminate messages. Audience surveys of video comprehension showed that 83 were aware of labor exploitation after watching the video. Playing cards with SAFE Seas messaging are another option that DFW and YPII are considering to reach fishers onboard vessels. The fishers’ association representatives highlighted the significant effect that SAFE Seas has had on their awareness including about the identification, training certificates, and legal documents (seaman’s book) fishers require before embarking, as well as the avenues of grievance available to them.

Village early detection: The plans to set up village level structures for early detection and prevention of problems through a system of sharing information and reporting cases are still unfolding. The DFW team has introduced the concept to several village officers in the project sites, but such a system is not operating yet.

Training institutes. Representatives of the Marine Polytechnic KP, Bitung, and the vocational training center in Tegal highly appreciated the training sessions on fishers’ rights protection provided to their students. The center in Tegal in particular voiced that it would be helpful to have a curriculum module that could be delivered by their teachers as part of the course for fishery workers and managers. One of the issues for the North Sulawesi Marine Polytechnic is the low take-up of the Basic Safety Training course. The college would like to have more engagement with the fishers’ associations to encourage their members to take the training, which is free according to government regulations.

Private sector. The first form of project engagement with the private sector and fish workers together was to include vessel owners in an IEC campaign with FL/TIP messaging posted on vessels and in fisher meeting places in the dock area. SAFE Seas has succeeded in engaging 15 workplaces in the campaign so far, exceeding the target number. Private sector approved/sponsored FL/TIP trainings of their workers on are on hold due to the pandemic. SAFE Seas has also provided training to recruitment agencies in Bitung and Central Java covering government requirements for fishing workers’ basic safety certification, contracts, and other requirements. The evaluation team met a representative of the Indonesian Fishing Manning Association (IFMA) from Central Java who valued SAFE Seas’ contribution to raising companies’ knowledge of the legal requirements for employing fishers. In late 2020, the project began engaging the Indonesian Pole and Line and Handline Tuna Fisheries in discussion with the Foundation for International Human Rights Reporting Standards (FIHRRST), the International Pole and Handline Association (IPHL), and the MMAF, to promote the government-endorsed Human Rights Certification among the industry. Through these initiatives the project aims to advance the supply chain responsibility approach in Indonesia, though this is still in its infancy. SAFE Seas has contracted an international consultancy team, commencing in January 2021, to study the fisher labor supply chain for both Indonesian and foreign vessels, to develop more effective advocacy and policies on protection during fisher recruitment.

²⁴https://www.youtube.com/watch?app=desktop&v=YxZ3sVGidgg&ab_channel=PlanIndonesiaOfficialChannel

Sub-outcomes 2.2 and 2.3 Reporting and Remediation Services

Despite the relatively short implementation period, SAFE Seas has made significant progress improving reporting and remediation services. Exhibit 12 shows the overall results on the performance indicators.

Exhibit 12. Progress on Access to Grievance Reporting and Remedy

Indicator	Progress and Evaluation Comment
SO 2.2 Number of cases reported through project-supported services October 2020 target: 2 End of project target: 12 Actual October 2020: 28	<ul style="list-style-type: none"> ▪ Exceeded target. 39 cases reported to date through two fisher centers. Officially, 28 of these are recorded while data for 11 cases was not yet verified.
OTP 2.2.1 (a) Number of reporting mechanisms created with project support	<ul style="list-style-type: none"> ▪ During the period, two fisher helpdesks, as well as the telephone hotline service were established in Bitung port and Central Java province.
SO 2.3 Number of service delivery guidelines formulated by the multi-stakeholder working group for FL/TIP victims October 2020 target: 0 End of project target: 1	<ul style="list-style-type: none"> ▪ Completion not targeted for this period. ▪ The fishers centers are working on two guidelines: Instructions on how to refer a case of FL/TIP in the referral system; and how to handle a grievance. ▪ Project staff note good progress in developing fisher center Standard Operating Procedures post October 2020 reporting.
OTP 2.3.1 a. Number of trainings provided to CSOs, community-based organizations/monitoring groups October 2020 target: 0 End of project target: 2	<ul style="list-style-type: none"> ▪ Not planned for this period
OTP 2.3.1 b. Number of agreements signed among service providers to coordinate referrals to FL/TIP victims October 2020 target: 2 End of project target: 3 Actual: 1	<ul style="list-style-type: none"> ▪ SAFE Seas has signed an agreement with the Environmental Justice Foundation that provides legal services for victims to seek justice in North Sulawesi and Central Java province. Remaining output carried into the next period.
OTP 2.3.2 Number of district referral network directories created and widely disseminated in project districts October 2020 target: 2 End of project target: 3 Actual October 2020: 3	<ul style="list-style-type: none"> ▪ Achieved. ▪ DFW has created a network directory and disseminated it in the project districts. The network directories refer to the national referral network, North Sulawesi referral network, and the Central Java referral network

The establishment of two fishers centers for reporting complaints and accessing information is one of the highlights of SAFE Seas' achievements. DFW's consultations with fisher communities and organizations evolved into the creation of the fishers centers for reporting complaints and seeking information on fishers' rights and pre-departure training certification requirements. The fishers centers were established in North Sulawesi and Tegal Central Java in late 2019, developing out of the process of SAFE Seas team receiving reports of labor abuses from meetings with fishers' associations and communities, particularly regarding abuse on foreign-flagged vessels.

The centers, based at the SAFE Seas/DFW offices, have been recognized by the MMAF, whose Deputy Director inaugurated the Tegal center in June 2020. The fishers centers have received a total of 39 cases between them. The project is in the process of further developing the reporting mechanisms and the systems of referral.

The evaluation team met several fishers and family members who are using the centers' services, and who expressed their deep gratitude to the SAFE Seas center in helping them to obtain compensation in grievance cases, including the case reported in the TPR of a fisher who fell ill while out at sea and was not allowed to return to shore. He passed away shortly after getting home, and his wife was able to receive proper compensation through the center's support. A village leader in Tegal expressed the hope that more centers could be established:

I hope in the future the fishers center is not only in Tegal, it should be in Pemalang, Tegal, and Brebes. I do not have any networking with the government to solve the problems. I communicate to the fishers center and they communicate the case to the ministry as well as the provincial level office.

One of the unexpected effects of the fishers center and the advocacy of the SAFE Seas team in Bitung is the formation of a fishers' association or trade union known as SAKTI (Serikat Awak Kapal Perikanan Bersatu Sulawesi Utara). The fisher crews were initially meeting as a "forum" and by October 2020 had formalized their group as a registered labor union. A member of SAKTI told the evaluation team that the fishers in Bitung (mostly working on foreign flag vessels from Taiwan and China) were inspired by the fishers center to establish their association, which educates fishing workers about their rights and the documents required for fishing on domestic and foreign flag vessels. The SAKTI founding member credited SAFE Seas with their increased awareness of their rights:

The representative expressed the union's willingness and interest in the becoming the custodian of the Bitung fishers center after the project ends.

Before SAFE Seas came, I did not understand about the regulations. Now we understand that the fishing companies in Jakarta do not follow the regulations.

Enabling and Limiting Factors

The foregoing discussion has raised several of the key enabling and limiting factors affecting the success of the project, along with the project response. The key limiting factors highlighted are the impact of the COVID-19 pandemic and the overall shortened timeline available in Indonesia. The evaluation team offers a further summary in Exhibit 13 on the enabling factors and constraints gleaned from interviews with staff and stakeholders.

Exhibit 13. Enabling and Limiting Factors in Indonesia

	Enabling Factors	Limiting Factors
External	<ul style="list-style-type: none"> The high degree of relevance of SAFE Seas to the government stakeholders in Indonesia has assisted the success of the national and provincial-level strategies. 	<ul style="list-style-type: none"> Varying political will at sub-national level, where the cause of fishers' labor rights is affected by the dissent over fish trawling bans, affecting support for the project objectives in Central Java. Collaboration with the private sector remains challenging for the field workers, given sensitivity around workers' rights. Delay of several activities due to COVID-19 related restrictions on travel and in-person meetings.

	Enabling Factors	Limiting Factors
Internal	<ul style="list-style-type: none"> ▪ Staff qualities including the perseverance of the Jakarta team assisted by the PD to have the project approved. ▪ Prior experience of the DFW in North Sulawesi ▪ Strong teamwork and commitment ▪ Strong communications advocacy expertise within YPII 	<ul style="list-style-type: none"> ▪ Staff turnover at YPII and DFW, as discussed in Section 3.3.1

3.2.2 Philippines

In the Philippines, implementation has been underway almost 3 years, with the arrival of the national PC in February 2018.²⁵ Under Outcome 1, progress has been slow at the national level toward improved enforcement efforts, in terms of revising or creating policies and regulatory frameworks and leadership toward harmonized labor inspection. However, the project has increased the level of multi-stakeholder exchange on the relevant laws and regulations and has increased BFAR capacity to assist in identifying FL/TIP. Progress has been stronger at the subnational level regarding multi-sectoral engagement and steps toward joint labor inspection, particularly in Palawan. For Outcome 2, mostly implemented at the local level so far, achievements are on track for the awareness raising outputs, while the development of reporting and remediation services is behind the workplan. Progress has been affected by a high rate of staff turnover, particularly among OND staff, and also among Palawan field staff as discussed in Section 3.3.1. Other key factors affecting progress are discussed at the end of this section.

Details of the Philippines’ progress against indicator targets, key results, and perceived effectiveness are discussed below per outcome. The analysis combines reported indicator results with a qualitative analysis of progress and effectiveness based on reports and interviews. As for Indonesia results, the project’s performance on its full set of CMEP indicators is presented in Appendix A.

Outcome 1: Improved enforcement to combat labor exploitation on fishing vessels

At the outcome level, the project proposes three year-long milestone achievements toward improved enforcement. With the completion of the trial joint vessel inspection in Tay Tay, Palawan in October 2019, SAFE Seas is on track toward the overall outcome achievement (Exhibit 14). The development and pre-testing of the inspection checklist and procedure was driven locally, rather than by the national inspection sub-group as originally conceived.

Exhibit 14. Achievement of Outcome 1 Milestone - Philippines

Target milestone 2 (October 2019–September 2020): **Key government agencies agree to conduct labor inspection trials on fishing vessels.**

Achievement: Six government agencies, three at national level and three at province level agreed to conduct joint labor inspection trial in Tay Tay District, Palawan in October 2019.

Milestone 3 (October 2020 – September 2021): The related government stakeholders receive improved labor inspection procedures or tools which include labor exploitation indicators including FL/TIP.

²⁵ The NPC resigned in November 2019 to take a position on another newly funded ILAB project in the Philippines. She was replaced by the Plan Project Management Specialist until the present NPC came on board in April 2020.

Sub-outcome 1.1 Regulatory and policy framework to combat labor exploitation on fishing vessels

Establishment of the SFAs.²⁶ The establishment of a SFA to drive the project, is a crucial crosscutting aim on which the project’s policy and inspection activities rest. Exhibit 15 shows the progress against the relevant CMEP indicator.

Exhibit 15. Progress in Establishing Safe Fishing Alliance (SFA) in Philippines

Indicator 1.1.1 Number of advisory groups created to drive the project	Progress and Evaluation Comment
<p>October 2020 target/End of project target: 21 Actual October 2020: 18</p> <p>Note: The national and sub-national composition of the target of 21 is not clear.</p>	<ul style="list-style-type: none"> ▪ Overall – Moderate progress at national level and good progress in Palawan. Two out of 5 SFAs fully functional. ▪ National Level - formation of national SFA and three working sub-groups completed under the IACAT, but not fully functional. ▪ Puerto Princesa, and Tay Tay, Palawan – completed formation of SFA and three functional sub-groups. ▪ Sarangani Province – Ongoing through collaboration with the Provincial Inter Agency Council Against Trafficking (PIACAT) to adopt the SFA. ▪ General Santos City – Not completed. OND Hesed is collaborating with the Local inter-agency Task Force Against Trafficking-Violence Against Women and Children (LIATFAT-VAWC) to incorporate the SFA and the corresponding working groups.

The evaluation finds that the Philippines SAFE Seas’ decision to use the existing IACAT structure as the institutional home for the SFA and the national activities was strategic and efficient as it avoided creating new structures. The TWG on Seafarers and Fishers within the IACAT, was set up in 2015 through an international anti-trafficking forum, the *Manila International Dialogue on Human Trafficking*, supported by the Embassy of the Netherlands. The concept of the SFA, and the role of SAFE Seas as the secretariat of the multi-stakeholder group, was adopted as part of the TWG, which is chaired by the DOJ, in early 2019. The project has brought an extended membership into the TWG, comprising representatives of additional government departments, fishers’ associations, and NGOs, including Greenpeace.

The TWG has agreed to form three working sub-groups responsible for advisory matters on harmonization of regulations and policy; multidisciplinary inspection; and awareness, education, and access to reporting and remedy for victims. However, one of the obstacles to moving forward is that the key partners have not agreed on the TOR and leadership structure of the SFA and the sub-groups. Progress on the national SFA functioning has stalled since late 2019 as neither DOLE BWC nor BFAR, the key ministries involved, is ready to take leadership. Representatives of the BWC met by the evaluation team expressed their commitment to taking part in the SFA and to collaboration with BFAR to incorporate labor issues in vessel observations/inspections, but BWC has not committed to taking the lead. In late 2020, the SAFE Seas team shared a TOR for the whole SFA for discussion. The TWG is considering alternative structures that may not involve a chair position. Given the time that has elapsed, the evaluation suggests that the viability of the proposed national advisory group structure needs to be reviewed by the project and its partners.

At the sub-national level, establishment of the SFAs has been strong in both sites in Palawan. The local LGU participants interviewed by the evaluation team in Puerto Princesa highlighted the importance of fisher safety to the prosperity and well-being of their communities. In Tay Tay, the SFA has also been formed and the project partners seek support for an Executive Order (EO)

²⁶ The results framework contains an activity for establishing the SFAs and sub-groups, but not an output or sub-outcome.

(mayoral) and municipal ordinance to give the SFA ongoing status. The EO reportedly faces resistance from the mayor’s office in Tay Tay, due to the attention caused by the rescue of minors during the trial inspection in 2019, but a municipal order has been proposed that would have a longer term of application. The SFA groups meet regularly as part of their respective IACATs, though only by online methods in 2020 since the COVID-19 outbreak. Advisory groups are also being established at the barangay level through the FARMCs.

In General Santos and Sarangani, OND Hesed has been working with the PIACAT in Sarangani and the LIATFAT-VAWC in General Santos to establish the SFA and working groups. The structure has been established in Sarangani, while in General Santos there is agreement in principal, but the plan to have an inspection sub-group has not yet come to fruition. The progress on multi-disciplinary inspection is discussed in relation to the inspection sub-outcome below. The reasons for lagging progress in General Santos are not clear, but staff turnover within OND may be one factor, along with government receptivity, and in 2020 the COVID-19 pandemic has shifted local government priorities.

Exhibit 16 summarizes the progress against the key performance indicator for improvement of the regulatory and policy framework. Note that inspection policy development is reported under Sub-outcome 1.2.

Exhibit 16. Progress toward Regulatory and Policy Improvement

Indicator	Progress and Evaluation Comment
SO1.1a. Number of policies, regulations or implementation guidelines created and disseminated with project assistance End of project target: 3 October 2020 target: 2 Actual October 2020: 1	Target not achieved. <ul style="list-style-type: none"> ▪ National Level - Partnership building with relevant government institutions through MOA or MOU with IACAT of DOJ; DOLE and MARINA. SAFE Seas incorporated the national protocols/provisions such as the DOLE 156 in the consultations in all project sites. ▪ Sarangani Province - OND collaborated with the PIACAT to finalize the Implementing Rules and Regulations (IRR) to include fishing vessel workers to an existing provincial Ordinance addressing FL/TIP, approved by the Governor in June 2020. <i>(Counted towards the target)</i> ▪ Puerto Princesa City, Palawan – Progress during 2020 on a proposed amendment to the existing city ordinance on FL/TIP to address roles of government stakeholders during inspections, penalties, and rescue operations, as well as provisions to institutionalize the SFA.

The quantitative target for the life of the project is to create and disseminate three policies, regulations, or implementation guidelines, covering local, regional, and national levels. The CMEP does not define whether these policies should be at the national or subnational level. Consequently, the evaluation does not find the indicator very useful as a benchmark of progress. Policy amendment should also be included in the indicator definition.

Toward this outcome, SAFE Seas is building partnerships with the DOLE, Department of Agriculture’s Bureau of Fisheries and Aquatic Resources (DA-BFAR), MARINA, and DOJ-IACAT for harmonization of policy and regulations governing fishers working conditions. The project signed partnership agreements with MARINA and DOLE in late 2019 to help ensure their commitment. However, MARINA’s commitment to collaborate through the MOA (memorandum of agreement) does not appear to have reached all senior officers. The project staff report that senior leadership of MARINA, represented by the Deputy Administrator, has actively engaged with the project since 2018. The project plans to strengthen this collaboration in early 2021 via the SFA TWG meeting to discuss several key areas of policy amendment including MARINA’s PFVSR. The NPC observed that going forward there is scope for SAFE Seas to build on a MOA for cooperation in labor enforcement signed in 2014 between DOLE, PCG and MARINA, which is tied to the Maritime Labour Convention, but excludes fishing vessels.

Interconnected with the slow progress of the national SFA sub-group functioning, the project has not been able to facilitate tangible progress on policy review and amendment at the national level, nor is a clear agenda for policy amendment or creation established. While the SAFE Seas team recognizes a need for DOLE’s DO 156-16 to be amended to better reflect multiple stakeholder interests, weak collaboration between DOLE and BFAR suggests this is unlikely to occur within the life of the project. The project’s approach has been to support consultation about and awareness of this regulation and others among other government agencies at national level and at the province level, through a series of round table meetings and seminars addressing:

- DOLE’s DO 156-16
- MARINA’s Philippine Fishing Vessels Safety Rules and Regulations (PFVSRR)
- Philippine Fisheries Code
- Anti-Human Trafficking Code
- IACAT hotline and referral system (e.g. Trafficking Hotline 1343)

Evaluation interviews with DOLE, MARINA, and BFAR confirmed that these processes have “opened the eyes” of officers in different agencies to their potential roles in addressing labor abuse on fishing vessels. For example, fisheries environmental observers under BFAR can be observant regarding the working conditions of fishers and report issues if necessary.

Collaboration between DOLE and the tuna industry. The project has also made a key contribution to improving dialogue between DOLE and the SOCCSKSARGEN Federation of Fisheries and Allied Industries (SFFAI) based in General Santos, through a meeting facilitated by OND Hesed. DOLE leadership recognize this contribution - in helping to find points of agreement on DOLE’s DO 156-16 and the Occupational Safety and Health Law, and ways forward to assist industry compliance, as well as to adjust the regulation to fit the Philippines fishing vessel context.

Sub-national policy development. At sub-national level, the project reporting highlights a significant policy introduced with project support in Sarangani province through inclusion of fishers’ concerns in the IRR of an existing provincial ordinance on FL/TIP. This amendment of the IRR was achieved through collaboration with the provincial government including the Provincial Social Welfare Office. Another significant development is the progress in Puerto Princesa, Palawan during 2020 on a proposed amendment to the existing city ordinance on FL/TIP to address roles of government stakeholders during vessel inspections, penalties, and rescue operations, as well as provisions to institutionalize the SFA.

Sub-Outcome 1.2. Quality of Labor Inclusive Inspections on Fishing Vessels

SAFE Seas has facilitated gradual progress toward a nationally approved inspection guideline for commercial fishing vessel crews. Exhibit 17 presents the related performance indicator results.

Exhibit 17. Progress toward Labor-Inclusive Fishing Vessel Inspection

Indicator	Progress and Evaluation Comment
SO1.2. Number of joint inspections conducted by members of interagency groups October 2020/EOP target: 1 Actual October 2020: 1	<ul style="list-style-type: none"> ▪ Progress at the national level toward a national approach is informed by trialing at the municipal/city level. ▪ A trial joint inspection successfully conducted in Tay Tay, to pre-test the joint checklist, resulting in a draft joint inspection list produced by Tay Tay inspection group at the end of March 2020. ▪ Puerto Princesa trialing has been held up by the pandemic. ▪ General Santos stakeholders are discussing the working group to look at the checklist.

Indicator	Progress and Evaluation Comment
OTP 1.2.1 Number of recommendations produced by SAFE Seas to improve labor inspection October 2020/EOP target: 3 Actual October 2020: 7	Project target exceeded for recommendations in the October 2020 reporting period. The recommendations refer to proposed actions agreed by the working group in General Santos City to move forward. These included forming a convergence approach among government agencies to do multi-agency inspection activities, creating a focal point or office in DOLE to tackle concerns on the fishing industry, LGU responsibility for inspections in municipal waters, call for an ordinance to create a TWG for General Santos City and Sarangani province; and establishing a fishers' help desk.

The project is working on the national and sub-national fronts simultaneously. Given the decentralization of government processes in the Philippines, the project has been able to support advances at the local level prior to the national level.

Currently the DOLE/BWC labor inspectorate conducts onshore inspections of crew documentation and does not have capacity for on-vessel inspections. A key activity to increasing involvement of BFAR fisheries observers was the series of trainings of BFAR fisheries observers where DOLE presented the regulation DO 156-16. The BFAR evaluation respondent was very positive about the value of this training and is keen to have a training of trainers' system put in place to build into their regular training of fisheries observers.

DOLE BWC representatives interviewed welcomed the engagement of the marine authorities (BFAR and MARINA) ministries to assist in inspection via a common system, but whether these should be joint-agency inspections as carried out in Thailand and South Africa, or individual agency inspections using a common checklist for fishers' working conditions has not been agreed upon. The national SFA continues discussing these issues and the project intends to support an international study trip to learn about the approach in Thailand, provided that international travel restrictions due to COVID-19 are lifted. This is only likely to be possible if an extension of the period of performance is granted by ILAB. The evaluation heard from the national level that DOLE BWC representatives would benefit from learning more from the South African system if overseas travel becomes possible within the project life. As a further initiative to advance policy and operations on coordinated labor inspection, Plan US is recruiting two international consultants to support both countries in early 2021.

At the local level, progress has been made on developing a common checklist in Tay Tay where several agencies planned and carried out an unannounced vessel inspection in October 2019. The agencies included PNG, radio, the Department of Social Welfare and Development (DSWD), and the office of Manpower. The event was significant on several counts, notably because three minors were found on board the inspected vessel and were subsequently transferred to their home province. The authorities met by the evaluation team expressed that they are keen to continue regular inspections but are lacking the resources in terms of boats as well as the environmental conditions around Tay Tay. A set of recommendations was produced by the Tay Tay stakeholders to refine the list and process. Another trial vessel inspection based on a developed checklist is planned for Puerto Princesa but has been postponed due to the pandemic.

As noted above, planning among related government agencies to produce an integrated inspection checklist has gradually advanced in General Santos, and a trial inspection is planned in 2021.

Outcome 2. Decreased indicators of FL /TIP among fishing vessel workers

The Philippines team has made good progress in implementing its awareness raising efforts, particularly among the fishing communities. The evaluation interviews found increasing awareness among fishers and their representative associations, though this is not yet

corroborated by the project's first survey on awareness. Regarding improved access to case reporting and remediation referral services, SAFE Seas is making gradual progress in the project sites, but the strategies are still under development.

Sub-Outcome 2.1 Awareness of fishers, private sector, and government

The Philippines team pursues a diverse range of awareness strategies directed at national and local government, fishers and their communities, and the private sector. Exhibit 18 presents the reported progress toward the relevant indicators.

Exhibit 18. Progress on Awareness among Community, Private Sector & Government

Indicator	Progress and Evaluation Comment
<p>OTC 2a. Percent of fish workers who understand the meaning of FL/TIP</p> <p>April 2020 target: 50% End of project target: 70% Actual April 2020: 6%</p>	<ul style="list-style-type: none"> ▪ The first survey of fishers' awareness conducted in 2020, serving as a baseline. ▪ Showed low levels of awareness across the project sites, average of 6% aware of FL/TIP.
<p>SO2.1 Number of government agencies with policies or ordinances adopted</p> <p>Target is set for 2021</p>	<ul style="list-style-type: none"> ▪ Not reported yet. This indicator is included as an indicator of government understanding, following awareness raising, but it goes a step farther to include adopting policies. ▪ Evaluation notes that the indicator also reflects policy change applicable to Outcome 1.
<p>OTP 2.1.1 a. Number of private sector fish companies that sponsor FL/TIP trainings for their fish workers</p> <p>October 2020 Target: 10 End of project target: 10 Actual October 2020: 13</p>	<ul style="list-style-type: none"> ▪ Continuous collaboration with the tuna industry federation in the General Santos and larger region covered by SFFAll through a series of meetings, but they declined to agree on training activities for fish workers due to the pandemic. ▪ In Palawan, SAFE Seas convinced 13 boat owners to allow their fishers to participate in training on labor rights. (The project reporting defines sponsoring as consenting to training).
<p>OTP 2.1.1 b. Number of workplaces displaying materials on indicators of FL/TIP and contact information in public view</p> <p>October 2020 target: 10 End of project target: 20 Actual October 2020: 15</p>	<ul style="list-style-type: none"> ▪ Exceeded target. ▪ SAFE Seas has supported display of posters and tarpaulins in the ports and fish processing areas counted as workplaces.
<p>OTP 2.1.3 Number of communities with early detection plans in place</p>	<ul style="list-style-type: none"> ▪ Planned for next reporting period in Palawan and Mindanao sites. The development is delayed compared to the workplan.

While the reported indicator results above are inconclusive about the progress made, the evaluation interviews with staff and stakeholders as well as the progress reports provide a fuller picture of the progress and effectiveness of the efforts as elaborated below per target group.

The efforts under this awareness component are supported by the Communications Specialist at Plan (as well as OND's communications officer), who informed the evaluation team of a wide range of communication products – two videos, social media, IEC posters, and tarpaulins.

The Plan USA representatives noted that the strategy could have been better designed with a baseline knowledge, attitudes, and practices (KAP) study across the three main target groups. Plan USA recently recruited the support of an international communications consultant to help sharpen the approach with training of project staff planned for November 2020.

Community level. At the fisher and community level, Plan and OND Hesed project staff work at the barangay level, especially through the FARMCs, to provide seminars to fishers and fishers' families. Regarding the implementation processes, the Palawan project staff noted that it is challenging to reach fishers themselves with materials and meetings, but their wives can be reached more easily. The available evidence on the effects of efforts so far on fishers' knowledge and practices is limited. In Palawan, the field staff has conducted meetings and IEC campaigns; however, the campaign as a whole has not had the benefit of a pre-survey of knowledge and attitudes to help develop the messaging and assess changes. As noted in Exhibit 18, (OTC 2a), the project's survey of fishers' awareness of rights in April 2020, which was taken as a baseline measure, suggested a low spread of awareness in the community. The evaluation could only access a small number of fishers and fisher community representatives, but their comments suggested growing knowledge of the issues and risks fishers face.

A fisher's wife who also helps her husband with artisanal fishing in Tay Tay, Palawan indicated that their awareness of rights has increased:

“ Before the SAFE Seas project we did not think about our rights as fishing workers. ”

Among the BFARMC representatives the evaluation team met, there was a high level of appreciation of the role of the project in raising the issue of fishers' rights and helping to educate the fishing communities. Observers from the provincial and municipal FARMCs also speak highly of the SAFE Seas staff and their diligence. FARMC representatives would like the duration of the project to be extended to enable more communities to be reached. The evaluation finds the project team has established strong networks with the FARMC representatives at the local level, some of whom are also in key positions at the national council level. As noted by the Philippines NPC, the project's orientation of the barangay FARMCs is intended to lay the groundwork for the intended Community Early Detection Plan that will integrate preventive awareness and response to fisher complaints.

As mentioned earlier in the report, our FGDs with FARMC and fisher community members found varying concerns and awareness of fishers' rights. Debt bondage was a concern across the sites, where fishers are paid an advance before going out to sea but may not be able to repay if the catch is small. Deception and lack of proper fishing documents and detention are the big issues in General Santos and Sarangani. Our interviews with fisher representatives, and insights offered by the project staff highlight the complexity of issues affecting fishers' rights and livelihoods, including the mode of fishing used and territorial access. As noted by the NPC, the Philippines project experience reflects the ongoing need to study these issues and refine the advocacy campaign accordingly.

Private Sector. SAFE Seas has worked through individual meetings with the tuna industry association, including Tuna Handliner Association, SFFAIL, and through the dialogue with DOLE mentioned above.

SAFE Seas also introduced its objectives at two annual meetings of the tuna congress held in General Santos. However, the industry is cautious of criticism, and refused to allow a SAFE Seas video to be shown at the conference depicting fishers working in harsh conditions on board the vessel.

The evaluation learned from one private sector interviewee that the attitudes and practices around recruitment and payment have not changed. The fishers are still paid as passengers, and not paid insurance because they are not considered full time workers. The tuna industry has shown a high level of opposition to DO 156 -16, and the project has helped to bring some of the discussion forward and to bring stakeholders to the same platform. The project plans to introduce supply

chain advocacy in the Philippines in the latter half of the project, in an adaptation of the MAST model implemented by an alliance of safe fishing groups in Thailand.

Government awareness. The project has pursued government awareness at national and local levels through the SFA structure, and significantly through a national SAFE Seas Summit held in Palawan in February 2020. This summit was reportedly effective in bringing together stakeholders from all levels and resulted in a recommendation for annual summits.

Progress on Access to Grievance Reporting and Remediation Services (SO 2.2 and SO2.3)

In the Philippines, the need for better grievance procedures is well recognized, but there has been little progress under the two related sub-outcomes. The strategy toward improved reporting and remedial services is still in the early stages. As shown in Exhibit 19, efforts to establish help desks and hotlines for reporting are beginning in General Santos, while the model to be introduced in Palawan sites is under discussion.

Exhibit 19. Progress on Access to Grievance Reporting and Remedy

Indicator	Progress and Evaluation Comment
OTC2b Number of fish workers who reported seeking services after receiving SAFE Seas campaign information October 2020 target: 5 End of project target: 35 Actual October 2020: 33	33 cases reported of family members seeking OND/AOS assistance in the repatriation of fish workers from General Santos detained in Indonesia.
SO 2.2 Number of cases reported. End of project target: 12 October 2020 target: 2 Actual October 2020: 33	<ul style="list-style-type: none"> ▪ While cases have been reported through OND, the project has made little progress in improving access to reporting in the local sites. ▪ As noted above, OND/AOS existing reporting desk received 33 reports of fishers detained in Indonesia
OTP 2.2.1a Number of reporting mechanisms created with project support End of project target: 2 Target October 2020: 1 Actual October 2020: 0	<ul style="list-style-type: none"> ▪ Mechanisms are a work in progress – in Palawan sites an online learning event for service providers on TIP reporting was held.
SO 2.3 Number of service delivery guidelines formulated	<ul style="list-style-type: none"> ▪ Not planned for the April to September 2020 reporting period.
OTP 2.3.1a. Number of trainings provided to CSOs, monitoring groups	<ul style="list-style-type: none"> ▪ Planned for October 2020 to March 2021.

Reporting mechanisms. In Palawan the project has just commenced training for duty bearers on the establishment of an ATIP help desk for fishers. Progress has been held up by the multiple demands on staff time. The project held a webinar learning event during the current reporting period on establishing Prevention and Reintegration of Trafficking in Persons (ATIP) help desks and existing reporting and referral ATIP systems. The form that such a help desk should take has not been decided yet for Palawan sites. FARMC interviewees expressed to the evaluation that the barangay reporting mechanisms on grievances may be sufficient as fishers do not want to be seen making complaints. Stakeholders in Palawan expressed concerns that a fishers center or help desk would not work well because the community is small, and the fishing boat operators would be aware of their complaints. There is a fear that those reporting cases will be known to the boat owners and lose work. The project staff noted that they have noted cases of abuse among artisanal fishers in Puerto Princesa that were reported to the local Social Welfare department. The project staff are working with the department to document the cases. The project

attributes these reports to SAFE Seas’ advocacy, although the cases are not yet reported against the Outcome 2 (OTC2b) indicator.

In General Santos, the project is building on the efforts of the AOS, the partner of OND, which already has an office in the Makar Wharf in General Santos. While OND and its partner AOS have assisted fishers from General Santos detained in Indonesia as a result of the boat owners’ illegal practices, the reporting system is not comprehensive. The feasibility of establishing a more extensive reporting and information center is still under discussion among OND and Plan staff, and OND plans to recruit a consultant to develop a concept paper on the help desk and case referral mechanism.

Remediation Services. The project has facilitated a set of recommendations for improvements to the remedial system for addressing fishers’ grievances and cases of FL/TIP, particularly through national policy consultation on the TIP law. In addition, the project has ongoing plans to develop a referral network directory in coordination with the IACATs in Palawan, Sarangani and General Santos.

Enabling and Limiting Factors in the Philippines

The evaluation summarizes the enabling and limiting factors that have influenced the progress and achievement of outcomes in the Philippines in Exhibit 20.

Exhibit 20. Enabling and Limiting Factors in the Philippines

	Enabling Factors	Limiting Factors
External	<ul style="list-style-type: none"> ▪ Good starting point with the existing laws and regulations. E.g. DOLE DO 156 is well aligned in principle with C.188 ▪ Engagement of DOLE in training events with other agencies and the private sector ▪ Political will of supporters such as the DOJ, Netherlands embassy, and other champions at the national level ▪ The strong interest of local LGU stakeholders and the FARMCs, who recognize that development of the community as a whole is affected by fishers’ labor exploitation. 	<ul style="list-style-type: none"> ▪ COVID-19 impact. The outbreak of the pandemic has had a huge impact on progress, requiring many activities to be moved online and others to be postponed. Some forms of advocacy cannot be replaced with remote communications, according to a project team member who has not been able to visit the project sites since taking up his position in April 2020. ▪ Resistance of the private sector. The industry regulation is a highly politicized arena (one fishing industry representative is quoted [TPR 2019] saying his life could be threatened if he supported the efforts related to applying DOLE 156-16). ▪ Lack of leadership commitment at national level ▪ Lack of consistency in SFA delegate attendance.
Internal	<ul style="list-style-type: none"> ▪ Effective skills of grassroots staff in Palawan and General Santos/Sarangani ▪ Plan Philippines and OND’s respective organizational strengths and recognition in anti-trafficking work. ▪ COVID-19 contingency plan and shift to online activities. 	<ul style="list-style-type: none"> ▪ Staff turnover and limited experience. Turnover among Plan and OND field staff has interrupted smooth implementation, while some staff members are very new to the field and to their area of technical responsibility. ▪ Demands on field staff and scope of work. On top of the politically challenging nature of the work, the field staff in Palawan and General Santos have wide areas to cover geographically and have to cover all project components.

3.2.3 Gender Mainstreaming

In the Philippines, OND has commenced awareness raising activities with female members of fishing families in its implementation sites, and women have also been targeted by the public awareness events in Palawan. As noted elsewhere in the report, the evaluation team met women from the project sites who join their husbands in artisanal fishing. The project team recognizes that women can be key influencers, especially when their husbands spend much of their time at sea. The ARO commissioned a gender study in the fishing sector in General Santos in 2020 to help inform project strategies. The study produced a number of recommendations including directing advocacy toward women in fishing communities, ensuring psychosocial counseling is provided for family members of victims of FL/TIP, and incorporating discussion of social protection and access to low interest credit within community interventions. SAFE Seas Philippines plans to discuss how to use the findings to shape the strategies for achieving Outcomes 1 and 2, including presenting the findings to stakeholders for discussion.

As part of a women's empowerment approach one of the project team's suggestions is to create women's self-help groups, promoting their voice on issues such as FL/TIP, linked with financial literacy training within a saving's club model. While this is a potentially empowering model, the evaluator notes that the feasibility of such an approach will depend on an extension of project time as such initiatives take considerable time to establish.

The evaluation also noted some efforts toward gender responsiveness within SAFE Seas Indonesia's approach, such as responding to the needs of female relatives of victims, including life insurance compensation cases. However, a great deal more could be done to make the interventions more gender sensitive. The evaluation heard from one of the legal aid services operating in Tegal that there are also women involved in artisanal fishing. The service has received several cases from women of sexual harassment, noting that women fishers sometimes disguise their gender to avoid harassment. The evaluation observes that the recommendations of the project's gender study in the Philippines could also be discussed and applied in Indonesia.

3.2.4 Regional Level Effectiveness

The regional or cross-country level of the project includes the coordinating role of the PD as well as some specific activities originally supported by the Plan Asia Regional Office (ARO). In July 2020, the project devolved ARO responsibilities to the country offices. These cross-country activities include the Pre-Situational Analysis, the gender study, and the mapping study of regional stakeholders.

Overall, the evaluation finds that the regional level work carried out through the PD and the regional office adds value in being able to bring lessons from one country to the other (such as the gender study recommendations and the fishers center approach), as well as the value of being able to link the project into region forums. The regional perspective also helps SAFE Seas benefit from the private sector social responsibility approaches pursued in Thailand under the USDOL-funded FAIR Fish project implemented by Plan International.

On the other hand, intervention models that work in one country context (or local context) may not work well in another. The fisher centers are an example that require careful adaptation of the approach. The evaluation team observed that such adaptation is being considered through collaborative discussion between the PD and the Philippines NPC.

As noted earlier (Section 3.1.2), the project results framework does not include regional outputs, which underplays the potential of having an overall project director and regional perspective. The project could add more value if the cross-country learning was captured by the project in lessons-learned documentation that can be shared with other regional advocates for fishers' rights and protection.

At the cross-country or regional level the project has commissioned various studies and knowledge products. These include the Pre-Situational Analysis finalized in October 2019, the gender study conducted in the Philippines, completed by Rapid Asia in 2020, and a Regional Stakeholder Mapping.²⁷

Regarding the effectiveness of the Pre-Situational Analysis, the evaluation team found that it has been useful to support the project's intervention rationale in each country and to provide a thorough scoping of the legal and policy context. The evaluator observes that the scope of the PSA brief was broad, including an investigation of the fish supply chains and points of exploitation from recruitment to the market, while the expectation was to produce a rapid assessment. It took approximately a year to finalize the study, reportedly due to project requests for additional analysis and the editing requirements, meaning the findings were not of practical use in guiding project strategies until late 2019. The study was not effective as a means of establishing baseline levels of knowledge or attitudes on FL/TIP or an analysis of the fishing supply chains per country. The scope did not include preferred media use among fishers and other stakeholder groups.

The gender study on the effects of FL/TIP on female relatives of fishers in General Santos and Sarangani in 2020 provides a thorough investigation of the issues affecting women members of fishing families and provides a number of actionable recommendations for improving gender responsiveness in the Philippines. As noted earlier, these recommendations are also applicable in Indonesia.

3.3 Effectiveness and Efficiency of Management and Implementation

This section examines the effectiveness and efficiency of the project's management and implementation arrangements. The section begins with a discussion of the management structure, staffing resources, coordination of implementation between the implementing agencies, and identifies areas needing improvement. A discussion of the project's CMEP and overall monitoring approach follows.

3.3.1 Management Structure and Implementation Arrangements

Question 6. How effective and efficient are the project's implementation and management strategies? What are the key strengths and weaknesses in project implementation and management? What areas need improvement?

Management Structure

SAFE Seas is implemented within Plan International's federation structure, composed of regional offices and national offices. The project is contractually overseen by the Plan International US office, which is responsible for technical, financial, and M&E advisory support; contractual compliance; and reporting to ILAB. The PD, based in Jakarta, Indonesia, was originally organizationally part of Plan's Asia Regional Office (ARO). In July 2020 Plan's ARO made a decision to transfer its grants portfolio to the country officers, so the positions of Project Director and the M&E Specialist were transferred to YPII. At this time the project revised its organogram to match the new arrangements. The PD is responsible for SAFE Seas programming direction in Indonesia and the Philippines, supervising the two National Project Coordinators (NPCs) and a cross-country M&E Officer. The PD reports operationally to the YPII Country Director and is supervised by Country Director.

In Indonesia, the project is placed under the operational direction of the YPII Executive Director. The full-time project personnel include the NPC, a finance and administration officer, and the recently added Communications Officer. The project also draws on existing YPII program and

²⁷ Rapid Asia, Plan International. 2020. Effects of Forced Labor and Trafficking in Persons on Female Relatives of Male Fishers. October 2020

technical staff including M&E support and program management support on a percentage of time basis. The project organizational chart in the Project Document provides an overview of the project implementation structure but does not fully describe the roles of the Plan country offices in recruitment and operational management.

In the Philippines, the project is housed within the programs section of Plan Philippines, under the Director and Deputy Director for Programs. The project staffing consists of the PC, M&E Officer, Communications Officer, Administration/Finance Officer, and two field officers (Palawan-based). As in Indonesia, Plan program staff members, including the program management officer for child protection, are also dedicated for a portion of their time. OND and DFW's project staffing is described below.

A strength of the involvement of an additional pool of Plan staff in each country is that additional resources are available when needed. This pool of staff members has been particularly helpful during the gaps after the resignation of the respective NPCs.²⁸ The disadvantage of using support from the pool is that the staff members are not working fully under the operational direction of the PD. The roles played by the Plan staff are not entirely clear regarding whether they perform both an advisory and a supervisory role, as indicated by a former project team member. Based on staff interviews, the evaluation team observed that the dual lines of operational management between the NPC and the PD, as well as to the Plan line management, do not lend themselves to optimum efficiency and effectiveness. Plan country office management is involved in selecting staff and monitoring project staff as well as the PD. A former staff member noted that a project management structure independent of the national offices would be more efficient; however, the project's integration with Plan's structure is not amenable to change.

The NPCs are responsible for coordinating with the local partners DFW and OND Hesus. Partner monitoring is also supported by staff at the national offices.

Overall, the evaluation interviews indicated that the above arrangements are functioning well. While the number of reporting and supervisory levels has led to lengthy technical progress report (TPR) completion according to country staff interviews, there were no delays cited in report submission to USDOL.

The role of the PD is challenging, entailing providing leadership and strategic direction to both countries while enabling each to develop their ownership and individual planning. Although former and current staff members expressed that the regional level and USNO has occasionally been too directive, the evaluation observes that the PD's cross-country role is well handled with a balance of guidance and collaborative planning. This balance has enabled course adjustments to be made based on each NPOC's on the ground experience.

Implementation Arrangements and Coordination between Partners

The sharing of implementation between Plan and its local partners is a key element of the implementation strategy.

In the Philippines, Plan has an existing partnership with OND Hesus on Plan's general program in Mindanao, contributing to the strength of the partnership. Plan is responsible for all national level work and subnational implementation in Palawan, while OND is responsible for implementation of Outcomes 1 and 2 in General Santos and Sarangani. This clear division of tasks between Plan and OND Hesus contributes to the implementation efficiency. OND Hesus's work with the fishing communities is well recognized, and OND are well connected with the stakeholders in Mindanao, making the organization a good choice as implementing partner. However, as a local NGO, their resources may be quite limited.

²⁸ The Philippines NPC resigned in November 2019 to lead another ILAB-funded project in the Philippines.

In Indonesia, Plan focuses on Outcome 1 at the national level, while DFW focuses on Outcome 2 in the subnational sites, as well as some specific tasks of Outcome 1 related to inspection policy at sub-national level. YPII is responsible for monitoring DFW implementation and coaching in reporting and M&E. DFW has traditionally worked on environmental issues in fisheries but has demonstrated strong commitment in expanding their concerns to fishers' rights. One of the emerging effects of DFW's engagement in SAFE Seas is a growing recognition of DFW as a player in fishers' rights protection.

The division of tasks outlined above is set out in DFW's partnership agreement, but according to DFW representatives, the division of labor has not been consistent throughout the time of different NPCs and acting NPCs. As a result, the DFW team has experienced some confusion on the task division during 2020 as well as a sense of YPII intervening in their task areas. This confusion has largely been resolved through discussion with the YPII NPC according to the DFW respondents. The evaluation recognizes the potential for overlapping tasks, given that YPII works in all project sites at the sub-national level, while YPII is also responsible for supporting the consistent operations of the fishers' centers. The team suggests that the partners continue open and collaborative discussion on how the tasks are to be shared or delivered by one or the other organization.

Human Resources

The number of dedicated full-time project staff is quite lean in each country, given the geographic scope of the project and the complexity of the strategies to be implemented. This leanness of project staffing is particularly evident at the field implementation level in the Philippines.

In the Philippines, Plan has one field officer covering Tay Tay and one covering Puerto Princesa in Palawan. OND is responsible for implementation in General Santos and two municipalities in Sarangani Province. OND project staffing consists of a coordinator, M&E officer, and a communications officer. These personnel are responsible for sharing the fieldwork as well as their specific roles. Based on interviews with current and former staff, the high workload, as well as more attractive permanent job offers, contributed to the series of resignations within OND project staff. Present staff noted that the field role is highly demanding in terms of workload as well as the complexity and politically demanding nature of the work. OND is in the process of hiring additional staff and has enlisted consultancy support for some tasks such as developing a concept for the General Santos helpdesk and referral mechanism for grievance cases.

In Indonesia, YPII project staffing as outlined above appears to be sufficient with the addition of the Communications Officer and the support from the program staff. The DFW project staff consists of the, DFW Project Coordinator, M&E officer, and five field-based staff, two in North Sulawesi and three in Central Java. The DFW Executive Director also devotes a significant proportion of his time to the project but is not considered a member of project staff. The number of DFW staff appears to be sufficient, but recent turnover of three Jakarta-based positions poses a challenge. There has not been any turnover among the field staff, to the knowledge of the evaluators. New staff members have recently joined as DFW PC, M&E officer, and administration officer.

Both countries need to ensure that the workload does not contribute to further staff turnover, and that staffing is sufficient. To this end, Plan Philippines offered to second its staff to OND. OND declined this offer and is seeking to recruit additional staff to expand the team.

Technical Skills and Expertise

The Plan US office project managers expressed that the project progress has been affected by the changes in staffing, but with the full complement of staff now onboard and with the appropriate level of skills, the project is in a strong position toward progress. The evaluation team also

observed a high level of appropriate expertise within the Philippines and Indonesia national coordinators at Plan, the expertise of the OND leadership and affiliated AOS staff, the Plan M&E staff, and the communications expertise. The OND team is all new and as yet untested. DFW has made remarkable progress in its relatively short contract time, which is a testament to the quality of its staff. The qualities of the staff at the field level in both countries has been noted earlier as a factor in effectiveness of the interventions.

3.3.2 Effectiveness of the Comprehensive Monitoring and Evaluation Plan

Question 7. Does the project's Comprehensive Monitoring and Evaluation Plan (CMEP) provide a valid means to monitor project progress and achievements; and to what extent has the monitoring and evaluation (M&E) system been effectively used by the project to inform management decision making?

Validity of the CMEP

The CMEP comprises the results framework, activities mapping, and the performance monitoring plan, including indicators and corresponding targets and data collection instruments. The CMEP was developed by the SAFE Seas team under the guidance of the ILAB during workshops held in 2018, and the document was finalized in December 2018. ILAB's M&E focal point for the project noted that there was discussion about the formulation of Outcome 2 during the project design and CMEP development. The focal point observed that the general OCFT guidance is that the outcome formulation provided in the FOA should not be altered during the CMEP development. This guidance is in place because of the competitive procurement process which is based on the outcome statements in the FOA.²⁹

Structure of outcomes, sub-outcomes, and outputs. As noted in the earlier discussion of the project's results framework, the evaluation team observed that the causal logic represented is broadly coherent, but there are some constraints as a framework for capturing the key changes brought about by the project. The key gaps the evaluation notes are as follows:

- **The lack of an output or supporting outcome for the establishment of the SFA alliance at different levels.** As noted, the establishment of coordinating structures was originally foreseen as a sub-outcome. Because the SFA structures at national and province/municipal levels support the results across Outcomes 1 and 2, it was placed as a crosscutting issue with no associated output in the results framework. According to Plan and ILAB staff the sub-outcome for coordinating structures was removed from the supporting outcomes in the CMEP process to avoid duplication in the RF. Rather, the number of SFAs (or FARMC advisory groups in the Philippines) established is included as an indicator (OTP 1.1.1) for the progress toward submitting final drafts of regulations and policy briefs to government (Output 1.1.1). For such a significant project result, especially if the alliances are intended to be ongoing consultative structures or bodies existing beyond the project life and not created just for policy drafting, the progress on their establishment and effective functioning should be clearly captured in the results framework either at the level of an output or a sub-outcome.

Including the creation of functioning advisory groups (SFAs) as a measurable result could be achieved without too much disruption to the framework by adding another output under SO1.1. The corresponding indicators could include qualitative milestones or targets regarding the effective functioning of the taskforce/alliance, such as the agreement of a

²⁹ The reason for this guidance, which is currently applied across OCFT teams, is that changing the outcome language in the CMEP may change the scope of the project. Considering the competitive procurement process, if the altered language had appeared in the original FOA, a different grantee could have been awarded the project. As part of a wider discussion of the project design formulation process, the evaluator finds that if the outcomes are not well formulated at the FOA stage, this can lead to a lack of coherence in the results framework.

terms of reference and the presence of multi-sectoral membership. If such an output is not created, an alternative option would be to strengthen the quality of the current indicator.

- **Outputs for regional-level achievements not included.** Achievements at the regional level are currently documented in the narrative TPR reporting but are not reported in the TPR Annex A as they are not included in the Performance Monitoring Plan (PMP) outputs or indicators. The evaluator suggests that the significance of regional efforts, and particularly the sharing of SAFE Seas experience and models, could receive more weight if there was a regional output under SO1.1, with a corresponding indicator.
- **Improvement in private sector support for government policies is only captured at the output level, with two associated output indicators.** While private sector understanding of acceptable working conditions is included together with improved understanding of fishers and government officers as part of Sub-Outcome 2.1, progress is only specifically measured at the output level with two indicators – agreement for rights training of workers to be conducted, and the posting of IEC materials in workplaces. Such a key result might have been more appropriately considered as a supporting outcome and measured via a knowledge, attitude and practice (KAP) survey. Given the length of the project duration that has elapsed, the evaluation does not recommend changing the overall results framework to better accommodate changes in private sector attitudes or actions in support of fishers’ rights, but the project should ensure due attention to the progress in its narrative reporting.

Indicators of achievement and targets. The evaluation team examined the indicators at each level of the RF. Overall, the indicators were found to be valid measures of change. The evaluator found that the use of progressive milestone indicators for Outcome 1 was appropriate given the challenges of developing quantitative targets to measure progress in policy development and coordinated enforcement processes. That being said, several of the quantitative indicator results require specific qualitative explanation to be clearly understood. Plan provides explanations of the results in the narrative column of Annex A, but this would be improved by providing more specific detail in for some indicators, including the country team’s interpretation of the indicator. Three indicators for inspection processes illustrate the point:

- The “completion of a joint labor inclusive vessel inspection” (Indicator SO1.2 for Sub-outcome 1.2 – Quality of labor-inclusive inspection on fishing vessels improved) is open to interpretation in reporting because it is not clearly defined in the PMP as a trial or a fully endorsed process. In practice, Annex A reporting counts the completion of a single trial joint inspection per country as meeting the end of project target of one joint vessel inspection completed.
- In the case of indicator OTP 1.2.1: Number of recommendations produced by SSP to improve labor inspection mechanisms that are agreed by the key government agencies, (measuring progress on the associated output), the number of recommendations produced and agreed upon is not as significant as the content and government level of the recommendations adopted. In Indonesia several recommendations on the mechanism have been agreed at the Ministry level; while in the Philippines, the project target was exceeded as a result of stakeholder agreement on 2 recommendations made by the project and approved by stakeholders in Tay Tay, Palawan, and 5 recommendations for joint inspections made at the SFA summit held in February 27-28, 2020, as reported in April 2020.
- In the case of achievement of a roadmap on labor-inclusive vessel inspection (Output 1.2.2: Roadmap for establishing a working unit for fishing vessel labor-inclusive inspections *disseminated*), the indicator is set at a higher level than the result it is intended

to measure – dissemination of the roadmap. OTP 1.2.2: “Number of stakeholders that have implemented the roadmap on inspection” where implementation is defined as using the roadmap as guidance for implementation or including the roadmap in agency regulations. The indicator could be revised to reflect adoption of the roadmap by the relevant agencies, which would set the bar a little lower.

Fortunately, the framework contains several indicators addressing the progress in multi-agency coordination in labor inspection of fishing vessels, including OTC 1 milestones; taking the indicator results along with the narrative explanations in the body of the TPR, a clear picture of progress in this complex area can be ascertained.

Measurement of change in fisher knowledge and attitudes. The measurement of change in attitude among fishers in each country under SO 2.1 is assessed via a survey conducted at end of Year 2 and at end of project. The sample size is approximately 100 respondents per country, averaging out to around 20 responses per municipal site. As noted in the CMEP, this may not be a representative picture of the fishing community reached by the project, and the sample size is too small to avoid bias in the results, in either direction. The survey will not necessarily provide reliable information about the effects of the project on fish worker awareness. The evaluator would not suggest conducting a much larger survey for the end of project iteration, but provided that COVID-19 conditions as well as the project timeframe permits, we would suggest that to strengthen the evidence regarding change, the project could conduct a set of outcomes interviews with fishers and fishers’ family members at the last reporting to triangulate with the quantitative survey results.

DFW and Plan field staff noted that they have found it difficult to reach the required number of fishers, as the fishers are often out at sea. At present only fishers are included in the survey and not fishers’ wives. The evaluation suggests including fisher’s wives, also targets of the communications, among potential the respondents, which would help reach the target number.

Application of the CMEP to decision-making and challenges of data collection

Under the guidance of the USNO MERL Advisor, the regional M&E Officer, the Philippines M&E Officer, and Plan M&E staff in Indonesia, the SAFE Seas team is closely monitoring the results as reported against the indicators.

As well as reporting the CMEP results every 6 months, the results are reported and monitored on a quarterly basis by the USNO together with the country teams and the PD. Therefore, the project staff is well apprised of the progress against the workplan and the indicators.

The indicator data are used well to keep track of progress, along with tracking against the project workplan. For example, the Philippines NPC used the project indicators to present the status of the progress to the recent meeting of the TWG.

Based on the results of the CMEP, the project team is monitoring for any changes in attitudes among the fisher communities and is sharpening the communications strategies to respond to the apparent low level of change. Nonetheless, the low level of awareness among fishers recorded in the second awareness survey (conducted in September-November 2019, reported April 2020 TPR) may underrepresent the improvements taking place based on the evaluation team’s interviews with fishers in Indonesia and the Philippines.

Quality of data collection and reporting. The field officers of Plan and OND Hesus in the Philippines and DFW in Indonesia have reportedly found data collection challenging from time to time, according to the staff themselves and the respective national M&E officers. There have been some challenges in interpretation of IEC materials posting, (IEC materials posted in communities were counted towards placement of materials in workplaces, but the narrower criteria was

subsequently reinforced), but overall, the collection of indicator data appears to be proceeding as planned. A monitoring visit in early 2020 found the records of field offices to be well organized.

Reporting and use of reporting templates for the TPR as well as internal quarterly reports has been challenging for both OND and DFW, based on Plan and partner interviews. In DFW's view, the reporting requirements and templates provided by YPII and the PD were not consistent and, on some occasions, additional work was required to re-draft the technical reports. This issue reflects a general learning reflected by Plan that local sub-grantees to be fully aware of the stringent reporting requirements of government donors and that the grantee needs to convey the requirements as clearly as possible.

3.4 Sustainability

The following section examines the project's sustainability strategy, phase-out strategy, and the factors affecting the prospects of sustainability of key project results.

3.4.1 Sustainability Strategy and Phase-out Strategy

Question 9. To what extent has a phase-out strategy been defined and what steps have been taken to ensure sustainability?

The project document contains a section on sustainability that presents a broad strategy for sustaining the desired results. The strategy contains three sustainability elements: *sustained linkages*, *sustained capacity*, and *sustained resources*. These are elaborated in terms of:

1. Building sustained collaborative *linkages* among government, private sector, workers' organizations, and civil society through the SFAs and involving major fishing companies working hand-in-hand with government, workers, and civil society.
2. Sustained *capacity* of government to undertake enforcement through institutionalizing the training of labor inspections, and developing the capacity of the local partners, namely OND Hased and DFW to continue their work in empowering fish workers' organizations to demand their rights for protection and to access reporting and remedy.
3. Building sustained *resources* by including FL indicators and labor-inclusive inspection procedures into curricula for new inspectors. Including FL indicators into inspection checklists is included as a resource to be sustained. Lastly, and more concretely as a sustainability plan, the project intends to identify the appropriate institutional home for the FishingPort.net.³⁰

These elements are essentially a re-formulation of the project's intervention strategies and intended results, which are themselves oriented toward lasting change. By their nature, the policy and regulatory changes sought by the project, such as the creation of interagency agreements for harmonized on-vessel inspection guidelines and procedures if achieved, will be lasting institutional practices. Other more concrete results such as the fishers centers, help desks, remedial mechanisms, and fisher information portal technology will require specific transition and resourcing exit plans that have not yet been developed.

The strategy has not been developed into concrete sustainability plan for either the Philippines or Indonesia and has not been updated in the annual October TPRs. The phase-out strategy is not defined in the project document other than setting a 6-month period for closeout activities. Currently this means phase-out would commence in June 2021. The evaluation finds that the sustainability plan needs to define more concretely the project's priority changes to be in place by the end of the project, and the steps to be taken toward sustainability, particularly for tangible elements of the project such as the management, legal, and financial basis of the fishers centers.

³⁰ Project documentation refers to the web portal variously as a Fishing Portal and FishPort.

3.4.2 Suitability of Sustainability Plans to Capacities of Local and National Implementing Partners

Question 10. To what extent are the project's plans for sustainability adapted to the local level, national level, and capacity of implementing partners?

SAFE Seas' fundamental sustainability approach is to deliver the project through the multi-stakeholder alliances at national, provincial, and municipal levels that are expected to be integrated within the existing institutional context. In the case of the Philippines, the plans are to integrate SFAs into the IACAT structures that operate in provinces as well as in the empowerment of the FARMC (councils) from barangay to national level. These councils are a potential home for the fisher grievance reporting mechanisms. The project is in the early stages of building the capacity of the BFARMCs to take the local advocacy forward after the project ends.

In Indonesia, the SFAs provide the structure for sustainability of the initiatives at national and sub-national levels. The alliances at the province or district level are intended to be complemented by community early detection systems at the village level through the village offices, but these systems are still in the introductory phase.

The sustainability planning and project planning take the capacity of the various national stakeholders into account by including a diverse range of capacity building supports into the project's services. Supports to capacity include webinars, information and training for government officials, study trips where conditions permit, and policy briefs.

3.4.3 Factors Limiting or Facilitating Sustainability of Results

Question 11. Are there any factors that are likely to limit or facilitate the technical or financial sustainability of project results?

The evaluation team considered the factors that may influence the sustainability for key results in Indonesia and the Philippines, including political, technical, and financial factors affecting the sustainability of specific results.

Overall, the evaluation found that it is too early to assess the likely sustainability of policy and regulatory change, especially given that changes in laws are not likely to come about within lifetime of project, but some intervention areas show good prospects for lasting results.

Indonesia

Toward multi-agency cooperation on policy and enforcement regarding fishers' labor rights. In support of this desired outcome as an enduring result, the National Team for the Protection of Seafarers and Fishers has legal status through government decree. Furthermore, there is strong recognition among the three key government agencies of the importance of coordinating together. With the launch of the NAP, the team has an ongoing agenda to carry out. In the absence of SAFE Seas, the task force will need to find an alternative secretariat office and find funding for National Team meetings.

Harmonization of domestic laws and regulatory frameworks. The prospects for an ongoing policy agenda are assured by the launching of the NAP and submission for president's approval in January 2021. This result has been achieved through the commitment of the CMMA and other government parties to address the policy and regulatory agenda. The success of the implementation of the plan itself is likely to be affected by the capacity of the GOI to secure additional external support to roll out the plan.

Local SFAs. The new multi-stakeholder initiative to address fishers' concerns takes time to build trust and maintain good relationships with diverse stakeholder groups, national and local. With the effective lifetime of the project shortened, the remaining time of 12 months, and 9 months of

DFW contract, is a short time to see the SFA established and functioning in Central Java. As a key constraining factor, political dynamics also threaten the creation and permanence of an SFA in Central Java where the local government focuses on managing other fishing industry concerns associated with use of illegal fishing gear.

Joint agency inspections. Based on the trial inspection in North Sulawesi and national SFA acceptance of recommendations, there is good momentum toward a nationally applicable system being approved beyond the project timeframe, provided that the joint inspection procedures guidelines are approved under the NAP, and that training systems can be put in place for the personnel in the agencies concerned. However, the system requires more time for piloting in other locations, involving the local offices of the MOM, Ministry of Fisheries and Marine Affairs and Ministry of Transportation.

Support of private sector/voluntary compliance. The evaluation has little evidence on the extent to which the project can sustainably influence private sector support, except on a limited scale. Entrenched practices of recruitment agencies may limit the sustained effects of the project, while the influence of public opinion and advocacy may support the sustainability of the results the project is looking to achieve among vessel captains and recruitment companies.

Access to reporting and remedy: The fisher's centers in North Sulawesi and Tegal currently have good prospects to be sustained, given the strong demand and their recognized success so far. Their continued operation, and possible replication, will depend on finding suitable institutional arrangements, financial support for staffing and training of the officers, and full documentation of the standard operating procedures, underway at the time of writing. Several possibilities exist for the transition of the centers to local institutional ownership, including DFW acting as a bridging institution. In Bitung, the new trade union, SAKTI, is interested in taking over the center, while the MMAF has expressed interest in replicating the centers in other locations in Central Java. Another candidate for housing the fishers' centers is the village office, which has the possibility of local budget allocation. The eventual transition process will require handover via on-the-job training to the incoming "owner" of the center, in the event that DFW ceases its management role. Grievance referral systems are in the early stage of development and documentation.

The development of local village detection systems is in the early stages in Indonesia, and it is too early to comment on the likelihood of their sustainability.

Likewise, the Fishport.net intended as a country-specific information portal is not established yet. Plan is currently seeking information technology consultancy assistance to establish the portal.

Philippines

Several factors limit or facilitate the sustainability of the results achieved to date:

Time to establish the project results is short: If the project ends in November 2021, it is likely that the sustainability of the results will be reduced. This applies to most of the results areas, but particularly those that have been delayed due to COVID and are at an early stage, such as the helpdesks and FL/TIP referral systems for fishers. These will take considerable time to operationalize. Several of the local stakeholders met by the evaluation team would like the project to be extended for some months or another year.

National SFA. In its favor, the national alliance has an ongoing life through the IACAT TWG. However, the functionality of the working groups and their stability is not yet assured, raising an issue for the project and partners to address going forward.

Local SFAs. Based on the local government support from agencies participating in the LIACATs and IACATs, there are prospects for these alliances to continue beyond the project lifetime, especially in Palawan. The strategy of providing legal status through submitting proposals for local

government ordinances approving the SFAs may assist in their continuation. However, these ordinances reportedly meet resistance from LGU officials in Tay Tay and General Santos whose interests may align with the fishing industry.

Multi-agency vessel inspections and BFAR collaboration in data collection. Local level multi-agency inspections depend on access to resources and ongoing commitment of the parties involved. There is momentum to continue in Palawan, but a national mechanism may not be achieved within the project life, and therefore not sustained without strong leadership at national TWG level. Positive factors supporting the movement toward coordination include the receptivity of BFAR to support data collection on fishers' working conditions, and the desire of DOLE to draw on resources of other departments. The integration of FL/TIP in the training curriculum of Fisheries Observer Program and in the inspection checklist requires training of trainers (TOT) for BFAR fisheries observers to enable continued expansion.

Private sector support. Currently, resistance is high among the commercial fishing sector in General Santos to accepting the DO 156-16 regulations and changing recruitment and payment practices. The project's forthcoming international consultancy (starting January 2021), to research the labor recruitment processes in commercial fishing or "labor supply chain" is expected to identify the practices that cause unfair recruitment and contribute to practical and sustainable strategies and contribute to DOLE's revision of DO 156-16. If the project receives an extended phase, there is scope to link with existing supply chain advocacy efforts.

Help desk or fisher centers are yet to be fully established. For the sustainability of these centers, an institutional location needs to be determined, and it will be important for fisher leaders to own the initiative and facility. Potentially, fisher leaders of the BFARMCs could be trained on managing the helpdesk and referral process.

Fishers' acceptance of exploitative conditions. The desperation of poor communities for income, exacerbated by the COVID-19 pandemic, may continue to make them willing to accept abusive labor conditions.

4. LESSONS LEARNED AND PROMISING PRACTICES

The interim evaluation gathered lessons learned and promising practices from interviewee perspectives, SAFE Seas TPRs, and the evaluators' analyses. The lessons reflect learning from both project successes and limitations. The promising practices identified are those that the evaluation team and/or stakeholders identified as practices or models that have been particularly effective toward achieving the project goals, or which serve as replicable models.

4.1 Lessons Learned

The evaluation team identifies the following lessons learned from the implementation of SAFE Seas that are instructive for future programing by ILAB, Plan, and other development groups.

- **Geographical scope needs to be appropriate to available human resources.** The broad geographical scope of the project in the Philippines is ambitious compared with the field staffing available, especially the number of municipalities and cities covered combined with the complexity of the issues to be addressed. It would have been more effective to reduce the number of localities at municipal/city level and to focus on developing strong implementation models in commercial fishing hot spots.
- **A multi-stakeholder baseline KAP survey would have been valuable as a basis for developing the communications strategy.** The communications strategy for raising awareness among different target groups was not based on specific information about the level of knowledge and patterns of media use per target audience: private sector, government, or community. Nevertheless, under USNO direction, and with international consultancy support, a Communications for Development strategy is being developed in November 2020 to sharpen the methods and messages for the communications strategy.
- **Time needed for regulatory and policy change to occur was underestimated in the design.** The project design anticipated that significant policies could be created and disseminated within the lifetime of the project. However, experience in the Philippines suggests that such changes may only be achieved after the project ends.
- **Challenge of gathering evidence of change in awareness of labor rights among fishers.** The current measure of surveying approximately 100 fishers per country is not a robust method to gauge change in knowledge and attitudes following project awareness campaigns. In the Philippines, across five implementation municipalities, the sampling represents 10 respondents per local area (barangay). The method risks biased findings in one direction or the other, and it has also been challenging to collect even this modest sample size due to fishers' absence at sea. In the absence of resources for a large scale representative survey, and toward a more sensitive means of assessing change in understanding of FL/TIP among fish workers and fishing communities, a case study focused on key informants including fishers and fishers' wives who have taken part in project events would be useful to supplement the next iteration of the survey.
- **Influencing private sector practices, which is critical to reducing and stopping FL/TIP requires multiple lines of intervention depending on the structure of the commercial fishing sector, including supply chain approaches.** The project design assumed that the private sector would see the "win-win" benefits of adopting improved contracting and payment practices, but private sector agreement with protective policies remains low, for example in the Philippines tuna industry.

4.2 Promising Practices

- **Establishment of fishers centers in Indonesia.** The fishers centers established in Bitung in North Sulawesi and Tegal in Central Java serve previously unmet needs to report cases of exploitation and are known and considered approachable in the fisher communities. The centers act as a reporting and referral channel, using standard intake forms and referral directory resources, and also serve as channels to raise awareness of fishers' rights. The national government report-receiving agencies such as MOFA appreciate the concise and complete reports received on the cases, which assists in proceeding cases. A number of cases have been satisfactorily resolved following reporting through the centers. The centers have inspired formation of a fishers' labor union in North Sulawesi. Replication of the centers is possible, and likely, in Indonesia. Potential exists for replication in other countries, with adaptation.
- **Effective communications strategies adapted to the COVID-19 situation.** In Indonesia, and increasingly in the Philippines, SAFE Seas has organized a series of webinars among diverse stakeholders. In Indonesia, SAFE Seas initiated WhatsApp groups to discuss, educate, and raise awareness of fishers' protection issues and also coordinate activities. The project is continuing to refine its messaging and communications channels.
- **Effective grassroots networking and advocacy in the Philippines and Indonesia.** Grassroots networks in the Philippines, such as the BFARMCs, have proven effective in disseminating information and mobilizing the participation of fishers. The barangay FARMCs conduct house-to-house information drives to inform members of the community. In Indonesia, village officers perform a similar role.
- **Enabling national ownership as a key to sustainability.** The SFA strategy has worked most effectively in Indonesia where the government already had ambitions for regulatory reform and better coordination, and the project has supported this with policy drafting and funding. This strategy has also enabled champions of fishing worker rights to have a louder voice in national platforms.
- **Emerging gendered advocacy approaches.** Plan has conducted a gender assessment and also a gender study in the Philippines. Although in the early stages, both Philippines and Indonesia field officers are beginning to work with women in the fisher communities to raise awareness of labor rights. In the Philippines, OND Hased has started targeting fishers' wives in project activities such as group education sessions. The advocacy strategies need further elaboration, including strategies for addressing the needs of women whose husbands are injured or disabled and also in recognizing and meeting the specific needs of women working as fishers in the two countries.
- **Use of mobile technology to record and store grievance cases.** Adapting Plan's use of the *Poimapper* mobile application appears to be an emerging good practice to map FL and TIP cases using Android phones.

5. CONCLUSIONS

Following are the evaluation team's conclusions based on the findings. The conclusions are organized according to relevance and coherence, effectiveness of the interventions, effectiveness and efficiency of management and implementation, and sustainability.

5.1 Relevance and Coherence of the Project

The project's aim to combat FL and TIP on fishing vessels in Indonesia and the Philippines is well aligned with the need to address these problems in both countries, particularly among fishers engaged in commercial fishing. The inclusion of sites in Palawan in the Philippines, where artisanal and municipal fishing on smaller vessels is the major fishing activity is also relevant to the needs of fishing communities and local government where debt bondage and child labor are common practices, but it is not as strategic to the goal as the interventions in the major port of General Santos.

The theory of change underpinning the project design, that better enforcement capacity of government (through harmonized regulations and multi-disciplinary labor inspection on fishing vessels); together with increased awareness of fishers, communities, government and private sector, and access to grievance reporting, and remediation services, will enable a reduction in FL and TIP on fishing vessels is valid for both countries. The strategies address identified limitations with regard to each issue. However, the factors affecting private sector compliance were not clearly established in the intervention logic, which has been reflected in slower progress in this challenging area. The project document design anticipated that the private sector would recognize the "win-win" benefits of being part of a SFA in both countries, but this is at a very developmental stage. In response, both SAFE Seas Indonesia and the Philippines are strengthening their private sector advocacy approaches going forward.

In Indonesia, the project has proven highly relevant to the needs and interests of national government stakeholders, as well as to provincial and sub-national government offices and other stakeholders in North Sulawesi, which has contributed to successfully establishing the SFA to lead the project interventions. Government authorities in Central Java are not as strongly engaged, though the project is relevant to the problems faced by fishers from the province who work on domestic and foreign fishing vessels. The evaluation found that fishers, family members, community representatives, and unions find the fisher centers' information and complaints assistance services highly relevant to their needs. The evaluation had a small number of interviews to assess the relevance to fishing industry associations and companies, but together with project reporting, the evidence suggests that private sector groups are gradually becoming more engaged with the project and seeing the value of the information and education it provides on applicable labor standards.

In the Philippines, SAFE Seas is relevant to the needs and interests of national and sub-national government and duty-bearers, particularly the DOJ, DOLE, and, increasingly, marine and fisheries agencies such as BFAR and MARINA. Provincial and municipal local government offices such as social welfare, tourism, sustainable development, and other members of the anti-trafficking structures, welcome the support of the project in helping them to coordinate on fishers' rights. While different concerns of fishers are prominent in General Santos, where fishers' detention and repatriation from Indonesia is the biggest issue voiced, compared with Palawan, where low income returns and debt bondage are common concerns, the project's key awareness and education initiatives are relevant to all the communities. The tuna industry federation of the General Santos and Sarangani region is open to participating in dialogues with government facilitated by SAFE Seas, albeit with some caution.

A hallmark of SAFE Seas is to work closely with and through the government-led initiatives in both countries: in Indonesia working with the relevant coordinating ministry and in the Philippines working through the vertically established coordination mechanisms for TIP and FL.

Given SAFE Seas' two-country coverage, and Plan's experience in fisher labor rights in the region, the evaluation concluded there is an opportunity to expand knowledge and lessons learned in regional advocacy platforms.

5.2 Effectiveness of the Interventions

Overall, the project is gaining momentum and success after a delayed start in Indonesia and changes in project leadership in the Philippines and Indonesia in 2020. The COVID-19 outbreak has caused delays project-wide, which have been well addressed but not entirely surmounted through online approaches.

Despite the delayed start, in Indonesia SAFE Seas has made good progress on its implementation plan and achievements of the intended results under Outcome 1 at national and local levels; and many of those under Outcome 2. Progress toward Outcome 1 targets is demonstrated at the national level through the creation of a functioning multiagency team and completion of the draft NAP. This brings the project on track toward improving regulatory harmonization, with a 5-year roadmap toward regulatory change. At the provincial level, the project has achieved its aim of creating effective safe fishing advisory bodies in North Sulawesi, while they are not yet functional in Central Java. Regarding inspection, the government agencies, with project support, are working toward a nationally accepted multi-agency inspection procedure and checklist, but its development along with procedural guidelines is still in its infancy. Key players at national level have accepted the principle of joint or multi-agency inspection, and a trial inspection was conducted in Bitung port in North Sulawesi, with plans agreed for further joint inspections in Jakarta.

Under Outcome 2, Indonesia has made a significant achievement with the creation of two local fishers centers serving information and reporting needs of the fishers and their family members. SAFE Seas is making moderate progress in building the capacity and commitment of the private sector to supply chain responsibility measures. However, the short time frame in Indonesia has limited the progress toward some results under Outcome 2, where several initiatives in the workplan have just begun - community-based early detection processes, formalization of the fishers center procedures and guidelines, and the fishing workers web portal is yet to be established. With only 12 months remaining for the project as a whole, and 9 months remaining for the DFW sub-contract, there is a risk that emerging good practice models will not reach maturity within the project lifetime.

The factors that have supported progress in Indonesia include the strong ownership of the government stakeholders at the national and provincial level for the strategies, as well as the skills and perseverance of the Jakarta and field teams of DFW. Key coordination challenges are the number of 'coordinating ministries' involved at national level, the complexity of coordinating vessel enforcement procedures, and the varying political will at sub-national level, where concern about fishers protection is overshadowed by disputes over government trawling bans. Collaboration with the private sector remains challenging for the field staff, given sensitivity around fishing workers' rights.

In the Philippines, where implementation has been underway almost 3 years, the full commitment of key government partners to lead the SFA has been a stumbling block toward advancing regulatory reform and multi-disciplinary inspection guidance. As such, progress has been slow in amending key regulations or creating policies and regulatory frameworks and developing a roadmap toward harmonized labor inspection. The project response to the challenges is

proactive, including the engagement of international consultants to help advance inspection policy and operations in both countries. Among its key achievements SAFE Seas has successfully increased multi-stakeholder exchange between DOLE and the tuna fishing industry on the DOLE and MARINA regulations. SAFE Seas has been instrumental in initiating capacity building for BFAR's environmental Fisheries Observers to assist in identifying FL/TIP signals on board vessels. In support of SAFE Seas' achievements, the project has strong government and non-governmental allies at the national level, especially within IACAT.

The project has been more successful at the subnational level than national level toward formalized multi-sectoral participation in the SFAs, where local government representatives are active in the SFA planning. In Palawan SAFE Seas has facilitated steps toward joint labor inspection protocols, with the success of a high-profile joint inspection trial in October 2019. For Outcome 2, mostly implemented at the local level, activity outputs are on track regarding raising awareness through the activities at municipal and barangay level in Palawan, General Santos, and Sarangani. Although the project's first survey of fisher awareness of FL/TIP early in 2020, shows a very low rate of awareness, representatives of the barangay FARMCs appear to be sensitized to the issues and are keen to carry the messages to the community. Regarding reporting and remediation channels, discussions are underway to build on the AOS existing help desk service in General Santos, but at the concept development stage, while the development of remediation services in all sites is behind the workplan. This was found to be partly due to considerable disruptions from COVID-19, and the high staff turnover at the field level among OND Hesus and Palawan field staff. SAFE Seas' achievements in the Philippines have been supported by the diverse skills of the project field staff of Plan and OND, as well as good standing of OND among stakeholders in Mindanao, and Plan's prominence in anti-trafficking work.

In both the Philippines and Indonesia, the project has begun implementing gender-responsive strategies, while the evaluation notes potential to enhance the gender-sensitivity of the project.

5.3 Effectiveness and Efficiency of Management

The evaluation found the project's overall management and communications structure to be effective with strong oversight and supervision mechanisms. However, the multiple levels of governance have led to lengthy reporting processes and some duplication of reporting lines between project staff and country office management and the project management via the regional office and Plan USA.

Plan's selection of implementing partners, OND Hesus and DFW, has added value to the implementation strategy, benefiting from OND's local networks and reputation and DFW's experience in North Sulawesi. The coordination with the partners is generally strong, though it requires some clarification of responsibilities in Indonesia. The staffing structure in Plan Philippines is effective overall while OND has lean staffing relative to the workload. The roles are demanding, and pressure has contributed to staff turnover at OND and Plan Philippines, which continues to pose a threat to staffing continuity.

Coordination and supervision are supportive from the USNO, but multiple lines of supervision including the regional PD, regional office, and the Plan country offices make lines of supervision not entirely clear. In both countries, staff turnover (within Plan Philippines, OND Hesus, YPII, and DFW) has interrupted the flow of implementation, while the Plan support staff has mitigated the disruption. The SAFE Seas management team has responded effectively to the COVID-19 pandemic through contingency planning in both countries.

The M&E system, comprising the CMEP and various cross-country reflection processes, is thorough. The evaluation identified some elements of the CMEP results framework and

methodologies for outcomes assessment that could be adjusted for better efficiency as well as to improve the usefulness of the information obtained.

5.4 Sustainability

The project has not defined a concrete phase-out strategy but has taken a general approach to sustainability through its crosscutting strategy toward stakeholder ownership of the SAFE Seas agenda. Building ownership is a valid approach, but some interventions would benefit from a specific exit plan, namely the fishers centers, helpdesks, and information technologies yet to be created or introduced by SAFE Seas.

SAFE Seas' broad approach to sustainability is based on building the capacities of governments, national and local; civil society, and of workers and their associations in Indonesia and the Philippines to claim their rights. As such, the project takes the availability of local resources and stakeholder capacities into account.

In Indonesia, the government endorsement of the SFA team assures the pathway for sustained multi-agency leadership and coordination for fishers' protection. The NAP for Protection of Seafarers and Fishers, once approved, also assures a pathway towards sustainability of national action through government funding. Achieving multi-disciplinary vessel inspection is at the early stages, but the project's contributions to building the system appear sustainable given political will of Indonesian authorities. There are positive prospects for sustaining the new fishers centers with development of standard operating procedures and government interest in replicating the centers, but the short time remaining poses a risk for managing the transition to a permanent home institution. Changes in established labor practices in the fishing industry and the planned Fishers Portal require more intensive project effort to create sustainability pathways.

In the Philippines, the national-level alliance for fish workers' protection is likely to continue, given SAFE Seas' strengthening of the IACAT working group, but its effectiveness depends on commitment of the key government partners to lead it, as well as a wider engagement of civil society labor protection groups at all levels of the SFA. Continued action by local SFAs on FL/TIP in fishing is assured by legal ordinances that are underway to sustain the alliances in some sites, and the commitment of local government members. As in Indonesia, achieving coordinated labor inspection protocols among the agencies appears a long term endeavor and requires more intensive project efforts to see formalized national policies and agreed protocols in place. Regarding the results under Outcome 2 that are delayed or in the early stages, namely community-based early warning systems and fisher grievance and reporting services, time is short to build the capacity of the organizations involved, such as the BFARMCs and mobilize resources. In the absence of an extension of time the prospects of building services across the project sites appears uncertain. Finally, there is potential for the project to influence improvement in private sector support for government regulations through the SAFE Seas brokerage depending on the depth and extent of engagement that is possible within the project timeframe. Linking in with wider regional supply chain efforts is a promising approach toward lasting industry-wide improvement.

6. RECOMMENDATIONS

The recommendations are directed to Plan and SAFE Seas implementing partners to inform the ongoing performance of SAFE Seas, organized according to those applicable project-wide and those that apply to each country. The evaluation also offers two recommendations to ILAB regarding future project formulation.

To Plan and Implementing Partners (Project-Wide):

1. **Submit a proposal to USDOL to extend the project duration by 12 months.** The evaluation team proposes a 12-month extension of time to enable delayed activities to be implemented and existing interventions to reach a sustainable status. Several key activities will have the opportunity to reach a more sustainable level with additional time, particularly the fishers centers in Indonesia and help desks or virtual reporting channels in the Philippines. The ideal extension duration is 12 months, depending on funds remaining and the potential for a no-cost or costed extension, or a combination of cost and no-cost. Plan should prepare a proposal to ILAB outlining the activities that can be implemented under different timeframe and costing options. USDOL should expedite the decision-making process so that if an extension is granted, the project can continue without disruption to staffing and continuity of sub-grantees.
2. **Update sustainability and exit planning in each country.** The project should create specific sustainability and phase-out plans per country, with sustainability targets. Possible targets include: legal basis for the local SFAs secured in the Philippines; handover partner identified for the fishers centers in Indonesia and training in standard operating procedures delivered; documentation of the fishers center and help desk models that are eventually established in each country, including the operating procedures, to enable replication elsewhere in the country. The sustainability plan should identify the priorities for the exit plan in case an extension is granted or not granted.
3. **CMEP adjustments.** The evaluation suggests the following adjustments and enhancements to the CMEP system to better capture and report important areas of change:
 - Add an output under SO 1.1 for creating or strengthening multi-stakeholder advisor groups, with an indicator incorporating the presence of a time-based workplan for the advisory group.
 - Add a regional-level output and indicators.
 - As part of the assessment of the effects on rights awareness among fishers and fishers' family members, subject to the prevailing COVID-19 conditions and the project timeframe, conduct a qualitative outcomes study via interviews with a small sample of fishers, fishers' wives, and village representatives to document changes in awareness to complement the final awareness survey.
4. **Enhance gender responsiveness in project activities, ensuring that the project responds to the needs of female family members and female fishers in Indonesia and the Philippines.** In line with the recommendations of the project gender study, in both countries SAFE Seas should:
 - Include women's role in fishing in advocacy materials

- Direct awareness and education on labor rights to women family members as well as male fishers and train women as peer advocates
 - Improve counselling and remediation services for families as well as victims of FL/TIP
 - Integrate economic security in fishing community forums.
5. **Strengthen regional sharing of lessons learned and promising practices from SAFE Seas in the SEA region.** SAFE Seas should develop and disseminate knowledge products to capitalize on the project's cross-country structure. The project could capture the learning from Indonesia and the Philippines experience in lessons learned and emerging good practices documentation that can be shared with other regional advocates for fishers' rights via conferences and online publication in related forums. Such regional stakeholders include the ILO, IOM, and UNDP implementers of the South East Asia regional Ship to Shore Rights Project, and the ASEAN Secretariat.

To SAFE Seas Indonesia:

6. **Enhance coordination between YPII and DFW.** To strengthen the coordination and collaboration between YPII and DFW, the partners should discuss the lines of task division and task cooperation and establish more clarity on the division of tasks.
7. **Prioritize areas for continued support to the NAP of the National Team.** Work with the National Team to prioritize what supports it needs from the SAFE Seas Project to advance the NAP in the remaining project period.
8. **Step up efforts toward consolidating the SFA in Central Java.** Based on observations that the Central Java SFA is not yet functioning well, the project should intensify local government ownership and support of the provincial forum by providing fishing vessel worker FL/TIP data to the governor and key government offices, as well as sharing experience from North Sulawesi.
9. **Consolidate the fishers centers' operations procedure and initiate a transition to long-term institutional managers.**
- To support the effective operation and sustainability of the two centers, the project should finalize Standard Operating Procedures including report receiving guidelines, follow-up processes, and case referral mechanisms.
 - SAFE Seas should initiate a handover transition process to the eventual managers, including the option of DFW serving as a bridge or center manager. If an extension of time is permitted, provide on-the-job training for incoming center staff.
10. **Enhance private sector advocacy.**
- To the extent that the project duration permits, intensify supply chain advocacy, working with selected fishing companies, recruitment companies, and buyers as models and advocates, linked with regional advocacy.
 - Given the importance of private sector compliance, SAFE Seas should continue to support the government's Human Rights Certification intervention for fishing companies in Bitung as a good practice model.

11. **Enhance fisher labor rights awareness and education.** Focus on strengthening awareness raising among fishers, their families and communities through the Community Based Early Detection Mechanism. Secondly, engage vocational institutions in the local SFA working groups and support them with learning materials on acceptable working conditions that can be used in formal and non-formal education for fishers after the project ends.

To SAFE Seas Philippines:

12. **Address the staffing shortfall and workload in the Philippines.**

- OND should either recruit two additional staff to support fieldwork in Sarangani and General Santos, or second two staff from Plan Philippines. Alternatively, narrow the geographic scope of the implementation in Sarangani.
- Plan should provide additional support to the field staff in Palawan. Options include providing dedicated administrative staff in Manila to the project field officers to reduce the administrative burden, recruiting additional field staff in Palawan or recruiting graduate interns from relevant university departments to assist the field staff.
- OND and Plan should ensure that new staff members receive sufficient technical coaching and support.

13. **Prioritize the national SFA strategy and strengthen linkages with the subnational SFAs.** Given the prolonged discussion of the SFA structure and leadership, SAFE Seas in consultation with the TWG leadership, should determine whether the thematic working groups are feasible; and consider alternative structures. To gain more traction at the national level, the team should enhance linkages between the national SFA and the subnational SFA agendas and highlight the progress of the subnational efforts.

14. **Private sector engagement.** Recognizing that change in private sector practices is a long-term and challenging endeavor, SAFE Seas should explore and pursue a wider range of strategies to engage private sector support, including supply chain advocacy, celebrity advocacy, and human rights certification of businesses as being introduced in Indonesia.

15. **Strengthen training of trainers on FL/TIP in fishing for FARMC to continue fisher advocacy on FL/TIP.** The FARMC groups at the community level demonstrate strong potential to continue the task of raising awareness on fishers' rights and the regulations governing commercial and artisanal fishing. The groups would benefit from a systematic TOT approach for the leaders to ensure that community education activities continue.

16. **Consult with local SFAs and communities on the preferred model for grievance and reporting services.** Since there are community concerns about reporting issues to a physical fishers center in the Philippines, the project and its partners should consult with communities and fisher representatives on the preferred channels in different locations (large ports versus municipal fishing), rather than replicating the Indonesia model in the Philippines.

17. **Data collection and case tracking of FL/TIP in fishing.** To make more factual data available for policy advocacy, as well as to track the nature and extent of grievance cases, support the DOJ/IACAT to integrate TIP/FL cases among fishers within the digital case management and tracking system for overseas Filipino workers. The digital case

management system should be linked to the web-based fishing portal under development, with access rules established for public and confidential information.

To ILAB:

18. **In future two-country projects, it may be more effective for ILAB to pre-select the countries, rather than leaving the second country selection to the proposals of the applicants.** This approach would enable greater research pre-award on the country context and stakeholders and permit stronger government and stakeholder ownership building in the ILAB and applicant preparation stage of the project.
19. **During the CMEP development, ILAB should permit adjustment to the formulation of the outcome statements toward a clearer logic for evaluation purposes.** Permitting adjustment to the formulation of the outcomes provided by the Funding Opportunity Announcement, in cases where ILAB and the grantee agree that the outcome statements do not meet results-based management standards, would improve the evaluability of a project. However, the process should not permit alteration to the fundamental project objectives and scope.

APPENDIX A: PROJECT PERFORMANCE INDICATOR RESULTS AS OF OCTOBER 2020

Exhibit A-1. Outcome 1 – Outcome-Level Indicator

Indicator	Country	Target/ Actual	Oct 2020	Final Value/Situation	Comment on Progress
OUTCOME 1: IMPROVED ENFORCEMENT TO COMBAT LABOR EXPLOITATION INCLUDING FL/TIP ON FISHING VESSELS					
OTC1: Improved enforcement to combat labor exploitation including FL/TIP on fishing vessels (C1)	IDN	Target for Oct 20	Milestone 2: (Nov 2019 - Oct 2020) The key government agencies agree to conduct labor inspection trial on fishing vessels (Key national stakeholders are: Ministry of Marine Affairs and Fisheries, MOM, and MOT)	Milestone 3 (Oct 2020 -Sept 2021) 1 inspection procedure and/or tool that have labor indicators including FL/TIP <u>finalized or received</u> by IDN Key Government Stakeholders.	
		Actual	3 national government agencies and 3 local government agencies agreed to conduct joint inspections at Jakarta Port and Bitung Port		Achieved 2 nd milestone target. Trial joint inspection conducted in Bitung Port in September 2020.
	PHL	Target	Key government agencies agree to conduct labor inspection trial	Milestone 3 (Oct 2020 -Sept 2021) The related government stakeholders receive improved labor inspection procedures or tools which have labor exploitation indicators including FL/TIP	

Indicator	Country	Target/ Actual	Oct 2020	Final Value/Situation	Comment on Progress
		Actual	Six government agencies agreed to conduct joint labor inspection trial		First trial inspection conducted in Tay Tay, Palawan in August 2019. Reported in previous TPR

Exhibit A-2. All Indicators (except for OTC1)

Indicator	Country	Target/ actual	October 2020	Final Value	Comment
Sub Outcome 1.1 Regulatory and policy framework to combat labor exploitation including FL/TIP on fishing vessels improved					
SO1.1a # of policies, regulations or implementation guidelines created and disseminated with SAFE Seas project assistance (Indicator counts the local, regional and national levels, cumulative, semi-annual)	IDN	Target	2	2	The target reflects difficulties the project has had in creating guidelines the GOI is willing to approve.
		Actual	1	N/A	- Refers to SAFE Seas assistance to the MMAF on drafting a letter regarding the prevention of COVID19 as a part of fisher protection. The Ministry released and circulated letter in May 2020. IDN SAFE Seas was delayed in achieving another target in April 2020 due to COVID-19 related lockdown. -The NAP on Protection of Seafarers and Fishers will be counted once it is fully approved by presidential order.
	PHL	Target	2	3	DO 156-16 does not reflect the perspective of BFAR, and given continuing dissent about the executive order, policy amendments at national level are not foreseen within the life of the project.
		Actual	1	N/A	* Sarangani Province - OND collaborated with the Provincial Inter Agency Council Against Trafficking (PIACAT) for the finalization of the Implementing Rules and Regulations (IRR) against Human Trafficking, inserting fishing into an existing provincial Ordinance addressing FL/TIP * Puerto Princesa City, Palawan - Project facilitated the passing of proposal to the City LGU for the amendment of an existing TIP ordinance to incorporate provisions to address fishers' concerns. * Taytay Municipality, Palawan - Project sought support from local legislators for the submitted Executive Order pertaining to safe seas project to be enacted as a local ordinance, still pending
	IDN	Target	1	3	

Indicator	Country	Target/ actual	October 2020	Final Value	Comment
SO1.1 (b) # of regional and local regulatory frameworks on exploitative labor conditions on fishing vessels aligned with national framework (Aligned means that regulations and policies are consistent between subnational level and national government)		Actual	1	N/A	The local government in North Sulawesi signed a governor decree to establish SFA working group, March 2020, including the role of SFA working group members and implementation policy of SFA. The signed decree was shared with SAFE Seas by the SFA North Sulawesi in April 2020
	PHL	Target	1	3	
		Actual	0	N/A	Target not achieved.
Output 1.1.1 Final draft of improved regulations and policy briefs submitted to government					
OTP 1.1.1 (a) # of advisory groups established to drive the process of policy and regulation revisions at all levels of government (in PHL affiliated with the FARMC)	IDN	Target	10	10	
		Actual	10	N/A	Target achieved as of April 2020 reporting period. Represents the number of SFA groups established at national and sub-national level.
	PHL	Target	21	21	
		Actual	18	N/A	18 groups established as of April 2020 reporting period. Advisory groups have not been established in the Sarangani sites.
OTP 1.1.1 (b) # of reports and policy briefs produced by the SAFE Seas project to inform decision making on FL/TIP by government policy makers	IDN	Target	2	3	
		Actual	5	N/A	Exceeded target number of policy briefs/reports
	PHL	Target	2	3	
		Actual	0	N/A	Target not achieved.
Sub-outcome 1.2 Quality of labor inclusive inspections on fishing vessels (procedures and implementation) improved					
SO 1.2 Number of joint monitoring inspections conducted by members of interagency working groups	IDN	Target	1	1	Target achieved, however the benchmark of conducting one coordinated or joint inspection seems to be set at a low level, without specifying whether this should be a trial or a fully approved process, is set low. IDN SAFE Seas facilitated the trial joint fishing vessel monitoring inspection in North Sulawesi in September 2020. Another trial inspection is planned for Jakarta port.
		Actual	1	N/A	
	PHL	Target	1	1	Target achieved. During the previous reporting period, ending April 2020, SAFE Seas facilitated a trial joint inspection in Tay Tay municipality in Palawan, involving various stakeholders. This activity
		Actual	1	N/A	

Indicator	Country	Target/ actual	October 2020	Final Value	Comment
					was also used to test the joint inspections checklist produced by the inspection sub-group.
Output 1.2.1 Inspection mechanism among related key government agencies is improved					
OTP 1.2.1 # of recommendations produced by SSP to improve labor inspection mechanisms that are agreed upon by the key government agencies	IDN	Target	6	9	Exceeded project target.
		Actual	10	N/A	Recommendations produced by SSP have been agreed by the Director and Deputy Director at the ministry level.
	PHL	Target	3	3	Exceeded project target for number of recommendations agreed but these recommendations only refer to those made by Tay Tay municipality stakeholders. The indicator does not distinguish between local and national level recommendations. There is no nationally agreed plan/recommendation for labor inclusive vessel inspections.
		Actual	7	N/A	
Output 1.2.2 Roadmap for establishing fishing vessel labor-inclusive IA inspections working unit <u>disseminated</u> among relevant stakeholders					
OTP 1.2.2 Number of stakeholders that have <u>implemented</u> the roadmap	IDN	Target	0	2	To be achieved by Oct 2021.
		Actual	0	N/A	
	PHL	Target	0	2	To be achieved by Oct 2021
		Actual	0	N/A	
Output 1.2.3 Fishing vessel and labor inspectors trained on incorporating labor exploitation into inspections					
OTP 1.2.3 (a) # of inspectors who completed training on FL/TIP in inspections of fishing vessels	IDN	Target	20	20	Note that this target needs to be adjusted according to Indonesia team because the actual number of inspectors at the two provincial sites is less than 20. It is not clear from the indicator definition which agency inspectors the indicator refers to.
		Actual	0	0	Delayed. The coordinated procedures have not been agreed upon.
	PHL	Target	20	20	Delayed. The project intends to train inspectors from MARINA and the Coast Guard. They will be trained on FL/TIP in anticipation of a coordinated inspection system. BFAR fisheries observers have been trained on indicators of FL/TIP but are not counted toward the indicator as they do not have an inspection mandate.
		Actual	0	0	
OTP 1.2.3 (b) Percentage of inspectors who report an increase in skills and knowledge after receiving training from the safe seas project	IDN	Target	85%	85%	
		Actual	0%	N/A	Delayed
	PHL	Target	85%	85%	Delayed
		Actual	0%	0%	
OUTCOME 2: DECREASED INDICATORS OF LABOR EXPLOITATION INCLUDING FL/TIP ON FISHING VESSELS					
	IDN	Target	60%	50%	M&E team informed the final target should read 70%.

Indicator	Country	Target/actual	October 2020	Final Value	Comment
OTC 2 (a) Percent of fish workers who understand the meaning of FL/TIP	PHL	Actual	N/A	N/A	No survey in the period. Value for April 2020:5/120 or 4%
		Target	60%	70%	
		Actual	N/A	N/A	April 2020: 7/11 or 6.7%
OTC 2 (b) Number of fish workers who reported seeking FL/TIP services or referrals after receiving SAFE SEAS campaign information	IDN	Target	5	35	Family members seeking services for fish workers can also be counted.
		Actual	34 (9 female)	N/A	Exceeded Oct 20 target. This represents the fish workers seeking services through fisher centers in Nth Sulawesi and Central Java.
	PHL	Target	5	35	
		Actual	33	N/A	OND assisted the repatriation of 33 fishers whose wives reported their husbands' detention in Indonesia for illegal entry in Indonesian waters
Sub-Outcome 2.1 Improved understanding among government, private sector, local communities and fish workers of acceptable work conditions in the fishing industry					
SO 2.1 # of government agencies with policies/ordinances adopted to prevent FL/TIP in the fishing industry	IDN	Target	N/A	2	"Consider revising targets USDOL PM's observation based on narrative in C1 tab)". Plan response: the target is not likely to be revised as the NAP has high level policies, which take longer to be adopted. IND target: MOM regulation on labor in fishing enacted
		Actual	N/A	N/A	Target is set for 2021
	PHL	Target	0	6	PHL: 6 Agencies – DOJ- IACAT, DOLE, BFAR, PPA, PCG, PNP-MG expected to adopt policies/ordinances to prevent FL/TIP in the fishing industry
		Actual	0	N/A	
Output 2.1.1 Improved private sector support of government policies					
OTP 2.1.1 (a) Number of private sector fish companies/boat owners that sponsor FL/TIP trainings for their fish workers	IDN	Target	5 (April 2020)	10	Activities postponed due to pandemic COVID-19. The Implementation was moved to the next reporting period.
		Actual	0	0	
	PHL	Target	5 (Apr 2020)	10	Philippines site-specific activities: Puerto Princesa, Palawan – Project engagement for advocacy purposes included 13 boat owners General Santos City – Continuous collaboration with SFFAI for possible engagements with boat owners/fish workers for training purposes. SFFAI declined to agree on training activities for fish workers due to the pandemic.
		Actual	13	N/A	
	IDN	Target	10	20	

Indicator	Country	Target/actual	October 2020	Final Value	Comment
OTP 2.1.1 (b) Number of workplaces (land or sea-based) that display materials on indicator of FL/TIP and contact information in public view	PHL	Actual	10	N/A	Achieved target. SAFE Seas has posted materials at 10 fishing workplaces in Tegal and Bitung.
		Target	10	20	
		Actual	15	N/A	Exceeded target
Output 2.1.2 MAST initiative introduced in Indonesia and the Philippines					
OTP 2.1.2 Number stakeholders that attend presentations on the MAST approach	IDN	Target	15	45	
		Actual	0	N/A	Target not achieved. Activity delayed due to COVID-19 restrictions
	PHL	Target	-	-	The initiative will be introduced in 2021, no target set yet.
Output 2.1.3 Increased understanding of labor exploitation including FL/TIP among fish workers and community members					
OTP 2.1.3 Number of communities with early detection plans in place and operational	IDN	Target	2	2	
		Actual	0		SAFE Seas team has initiated the early detection plan at village level, but it is not in place yet.
	PHL	Target	2	3	
		Actual	0		Capacity building for referral and reporting systems during the reporting period only covered the relevant duty bearers and not the community. FL/TIP community-based protection mechanisms will be introduced in the next 6 months
Sub-Outcome 2.2 Ability of fish workers and their families to report exploitative working conditions on fishing vessels improved					
SO 2.2 Number of cases reported through project supported services (help desk, hotlines)	IDN	Target	2	12	Cumulatively 28 cases reported and verified and 11 cases with report data not yet verified – 39 in all. During current reporting period, fishers centers in Tegal, Central Java, and Bitung, North Sulawesi received 15 cases from fish workers on Indonesian-flagged fishing vessels.
		Actual	28 (Cumulative)	N/A	
	PHL	Target	2	12	Through OND HESED's existing reporting referral center (AOS) the project assisted repatriation of 33 fishers whose wives reported their husbands' detention in Indonesia for illegal entry in Indonesian waters
		Actual	33	N/A	
Output 2.2.1 Reporting mechanisms (using appropriate technology) strengthened					
2.2.1 (a) Number of reporting mechanisms created with project support	IDN	Target	2	3	Oct 20 target achieved
		Actual	2	N/A	During this reporting period, the reporting help desks, Poimapper and telephone (hotline) at fishers' center established at Central Java and North Sulawesi Province.
	PHL	Target	1	2	
		Actual	2	N/A	Project reports: Puerto Princesa City and Palawan: Ongoing work: Project initiated learning event webinar on the establishment of ATIP

Indicator	Country	Target/actual	October 2020	Final Value	Comment
					help desks, existing reporting and referral ATIP systems. Evaluator is unclear how this constitutes two mechanisms created.
2.2.1 (b) # of hotline/helpdesk staff trained	IDN	Target	5	10	
		Actual	5	N/A	Training of staff conducted online due to COVID-19. DFW staff have been trained on Poimapper mobile app to record fisher complaints cases.
	PHL	Target	5	10	
		Actual	0	0	PHL SAFE Seas has just started capacity building for duty bearers on the establishment of ATIP help desk and an introductory course and not specifically how to run a hotline/helpdesk.
Sub-outcome 2.3 Improved access to remedies of TIP/FL and/or exploitative working conditions					
SO 2.3 # of service delivery guidelines formulated by multi-stakeholders working group for FL/TIP victims	IDN	Target	0	1	Fishers centers are working on two guidelines: Instructions on how to refer as case of FL/TIP in the referral system, second how to handle a grievance.
		Actual	0	N/A	
	PHL	Target	0	1	No guidelines formulated yet.
		Actual	0	N/A	
Output 2.3.1 Strengthened referral networks and mechanisms fishing vessel workers, especially for FL/TIP victims					
OTP 2.3.1 (a) No. of trainings provided to CSOs, CBOs/monitoring groups	IDN	Target	0	2	Not planned for this period
		Actual	0	N/A	
	PHL	Target	0	2	Not planned for this period
		Actual	0	N/A	
OTP 2.3.1 (b) Number of agreements signed among service providers to coordinate referrals to FL/TIP victims	IDN	Target	2	3	SAFE Seas has signed MoU with Environment Justice Foundation (EJF). The EJF provides legal services for victims to seek justice from Central Java Province and North Sulawesi Province. The remaining output for the period will be carried into to the next reporting period.
		Actual	1	1	
	PHL	Target	2	4	Delayed
		Actual	0	N/A	
Output 2.3.2 Updated referral network directory for fish workers on fishing vessels, especially for FL/TIP					
OTP 2.3.2 (# of) District referral network directories created and widely disseminated in project districts	IDN	Target	2	3	SAFE Seas has created a network directory and disseminated in project districts and on its website. The network directories refer to the national referral network, North Sulawesi referral network and Central Java referral network.
		Actual	3	N/A	
	PHL	Target	2	3	Not achieved.
		Actual	0	N/A	

APPENDIX B: LIST OF DOCUMENTS REVIEWED

Project Operation and Reporting Documents

- ILAB FOA-2017-04
- Project Proposal, 2017.
- Cooperative Agreement and project modifications
- Sub-grantee Agreements
- Project Document. Revised version October 11, 2019.
- TPRs and Status Reports submitted from the project start until evaluation fieldwork
- Performance Monitoring Plan Data, Annex A of Technical Progress Reports
- Work plans submitted with the TPRs
- Correspondence related to TPRs
- SAFE Seas Comprehensive Monitoring and Evaluation Plan, December 18, 2018
- Realigned Project Budget, October 29, 2020

Research Products

- Plan International. Forced Labor and Trafficking in Persons among Fish Workers in Indonesia and the Philippines. Pre-Situational Analysis. The SAFE Seas Project. July 12, 2019.
- Plan International/Rapid Asia. Effects of Forced Labor and Trafficking in Persons on Female Relatives of Male Fishers. October 2020.
- Regional Stakeholder Mapping.

Background Reports

- ILO. Caught at Sea: Forced labor and trafficking in fisheries; also see: <https://hal.archives-ouvertes.fr/hal-01525149/document>.
- Verité. (2016) Research on Indicators of Forced Labor in the Supply Chain of Tuna in the Philippines. Funded by the US Department of Labor.

APPENDIX C: LIST OF PERSONS INTERVIEWED

This page has been left intentionally blank in accordance with Federal Information Security Management Act (FISMA) of 2002, Public Law 107-347.

APPENDIX D: KII AND FGD GUIDES

This page has been left intentionally blank.

APPENDIX E: TERMS OF REFERENCE

This page has been left intentionally blank.