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**EVALUATION REPORT OF THE EMERGENCY  
ANIMAL HEALTH AND WATER REHABILITATION  
PROJECT IN MARSABIT DISTRICT OF NORTHERN  
KENYA.**

(USAID GRANT No. AOT-G-00-00-00145-00)

**FINAL REPORT**

**AUGUST 2001**

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## **ACKNOWLEDGEMENTS**

The consultant wishes to thank every one involved in facilitating the successful execution of this evaluation mission. The support received from the ITDG-EA Marsabit field team, in particular the Project Coordinator, Simon N. Munyao, the Water Technicians Ali Mohamed and Yusuf Gedi, the Accountant, Wanja Boore, the Community Mobiliser, Talaso Chucha and the Animal Health Technician, Ali Adano. Their support was instrumental in making this task enjoyable and informative. Staff from ITDG-EA Nairobi office, RAPP Manager Ms. Isabella Masinde, Finance and Administration Manager, Yobesh Amoro, RAPP Social Scientist, Joseph Githinji, Pastoralists Programme Manager, Irene Njumbi and the Administration Assistant, Ruth Njeri are all thanked for their support and technical inputs in the evaluation mission

In addition, the personnel from the relevant ministries and agencies such as MOA&RD, OP/ALRMP and Water Development Department of ME&NR are thanked for their assistance during the exercise. Special mention goes to Dr. Zachary M. Mwaura – Deputy DVO, Dr. Mungathia – Veterinary Officer, Abdi Abdile – Deputy Water Engineer, Abdullahi Wario, DAPO and Godana Doyo, CDPO – OP/ ALRMP. Other stakeholders in Marsabit are also thanked for their support. These include, Stephen Galgalo, Water Coordinator, FHI, Dr. Wamwere Njoroge, Project veterinarian MDP/GTZ and Wario Guyo – Logistics Officer, PISP.

Last but not least, all the beneficiaries including Community-based Animal Health Workers, Water User Associations, officials and administrators are thanked very sincerely for participating actively in this review and giving views and suggestions on the project implementation and impact.

## **LIST OF ABBREVIATIONS**

AHA	Animal Health Assistant
ALRMP	Arid Lands Resource Management Programme
CAHW	Community Animal Health Worker
CDPO-OP (ALRMP)	Community Development Project Officer- Office of the President,
CIFA	Community Initiatives Facilitation Assistance
DAH	Decentralized Animal Health
DAPO	District Animal Production Officer
DSG	District Steering Group
DVO	District Veterinary Officer
DWE	District Water Engineer
DWUA	District Water Users' Association
DWUA	District Water Users' Association
EMCs	Environmental Management Committee
EVK	Ethno Veterinary Knowledge
EWS	Early Warning Systems
FARM	Food and Agricultural Research Management
FHI	Food for the Hungry International
FMD	Foot and Mouth Disease
GTZ	German Development Cooperation
ITDG-EA	Intermediate Technology Development Group – East Africa
KARI	Kenya Agricultural Research Institute
LWR	Lutheran World Relief
MDP	Marsabit Development Programme
MEM	Micro Enterprise Management
MOA&RD	Ministry of Agriculture and Rural Development
NGO	Non Governmental Organization
NRM	Natural Resource Management
OFDA	Office of Foreign Disaster Assistance
PISP	Pastoralists Integrated Support Programme
RAPP	Rural Agriculture and Pastoralism Programme
TNAs	Training Needs Assessment
UNICEF	United Nations Children's Fund
USAID	United States Agency for International Development
WUAs	Water User Association

## **EXECUTIVE SUMMARY AND RECOMMENDATIONS**

### **Introduction**

This report is an outcome of an evaluation mission in respect of ITDG-EA/Lutheran World Relief emergency animal health and water rehabilitation intervention implemented in Marsabit district, Kenya between the June 2000 and July 2001. Acacia Consultants Ltd., a relief and development consultancy firm based in Nairobi executed the evaluation mission between 6th and 31st August 2001. The evaluation was executed in accordance with the Terms of reference (see Appendix II) prepared by ITDG-EA and USAID. It involved reviewing project documents, interviewing the project team and staff of relevant government departments, beneficiaries, key stakeholders, institutions and organizations involved in development and relief operations in the district. In addition, the assignment included the facilitation of a workshop to share initial findings and to provide an opportunity for ITDG-EA staff to feedback into the process. The evaluation assessed the extent to which animal health had been enhanced and examined the extent to which access to water by humans and livestock had been improved. It included providing recommendations on enhancing linkages between emergency and long-term development work and also looked into the potential for sustainability of the project's outputs in the longer term.

### **This report**

The report has six sections. Section 1 gives the introduction, section 2 presents the findings, section 3 assesses the project implementation performance and impact, section 4 provides issues arising from implementation, section 5 presents some proposals linking emergency to long-term development and the last section gives recommendations.

Two Annexes containing people met for discussions during the evaluation mission and the Terms of Reference respectively have been attached to provide more information that could not otherwise be presented in the main report.

### **The project**

The Emergency Animal Health and Water Rehabilitation Project was funded by USAID-OFDA (**GRANT No. AOT-G-00-00-00145-00**) and implemented by ITDG-EA through the Lutheran World Relief, (LWR). A sum of US \$347,810 for phase 1 was approved for this intervention. The project was initially supposed to be implemented over a period of six months i.e. between June 12, 2000 and December 31, 2000 (referred to as Phase 1) but this was extended to continue between January 1, 2001 and April 30, 2001 (Phase 2) due to the fact that drought conditions were still prevalent in the targeted area. However due to delays in the processing and approval of the extension, a further no cost extension was granted to give additional time for project implementation between April 30 to July 31, 2001. The total cost of both phases came to \$ 662,155.00 from USAID with a community contribution of Kshs. 3,965,940.

The aim of the project was to strengthen the local capacity of pastoralist communities, individuals and institutions to respond to drought-related disasters in five divisions of Marsabit District, (see map on page 9). The project objectives were *“to safeguard pastoral livelihoods through enhanced animal health services and to improve access to water by human and livestock populations in the targeted area”*.

### **Implementation strategy**

LWR entered into an agreement with ITDG-EA - EA for implementation of the project from May 31, 2000. LWR disbursed funds to ITDG-EA by means of an imprest advance system upon submission of a preliminary two-month cash flow projection. LWR then replenished the imprest advances based on the monthly financial expenditure reports from ITDG-EA.

The implementation of activities entailed the purchase and distribution of animal health drugs in consultation with the District Veterinary Officer (DVO). The purchase of drugs was to be done monthly depending on type of drugs demanded based on reports by the DVO, ITDG-EA field staff and drug store committees. The project worked in collaboration with the veterinary department and community committees to ensure that drugs reached the target groups in the various divisions. ITDG-EA put in a drug tracking system that monitored the movement of drugs from purchase to consumption at the community level using batch and serial numbers of the various drugs, and return of the empty containers for verification.

In addition drugs for replenishing drug stores were provided to drug store committees in Forole and Torbi, and community members/herders were provided with training on Community Based Animal Health Care (CBAHC), based on ITDG-EA's Training manual. At the end of the training, each of the trained CAHWs would then receive a drug kit<sup>1</sup> composed of non-expendable items to start providing animal health services to their local communities.

The water intervention was implemented after a consultant carried out a detailed assessment of the water facilities in the targeted divisions and of the training needs for Water User Committees. Based on this assessment ITDG-EA implemented specific activities aimed at rehabilitating boreholes, shallow wells, springs and pans. It also provided training to WUAs and pump operators. To avoid the frequent breakdown of boreholes, ITDG-EA rehabilitated 11 bore hole, bought 2 generating sets mobile generating sets for umbrella DWUA. Finally, ITDG-EA, in collaboration with the Water Department, mobilized WUAs into forming a DWUA to set up conditions for hire and management of the emergency services.

### **Targets**

The total amount of money earmarked for animal health services and improved access to water was USD 293, 516 and USD 368, 639 respectively, bringing the total amount of money spent during both phases to USD 662,155.

The number of livestock targeted was 80,000 for the first phase and 53,300 for the second, bringing the total target to 133,300. This number includes all the livestock species. The water intervention targeted rehabilitation of 11 boreholes, purchase of 4 standby generating sets, tankering of emergency water to strategic but vulnerable community members, construction of 2 underground tanks of 70,000 litres each, and the rehabilitation of water pans and springs (desilting of 5 water pans, protection of 6 springs/shallow wells).

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<sup>1</sup> The content of the kit was based on ITDG-EA's past experience in Decentralized Animal Health (DAH) activities in RAPP project sites, and emergency services in response to disaster-related diseases.

### Review Findings, Results and Impact

- The planned activities were implemented satisfactorily.
- The water intervention assisted the pastoralists to improve their water supplies. A total of 11 boreholes, 7 pans and 65 shallow wells were rehabilitated/protected. The improvement of shallow wells and desilting of water pans in particular contributed to opening up of under utilized rangelands, leading to reduced pressure on the permanent water points and consequently enhanced environmental conservation.
- By establishing the District Water Users' Association as an umbrella organization, the project provided an avenue through which capacity for water development and management in the district could be strengthened and coordinated.
- The emergency intervention contributed to sustained livestock production as it saved livestock from diseases such as trypanosomiasis and Foot and Mouth Disease, (FMD), and contained future outbreaks. This resulted in improved animal and body condition, making them less vulnerable to the negative impacts of the drought. The total number of animals treated as at the time of the evaluation was 84,338 during phase 1 and 129,260 during phase 2, bringing the total number treated to 213,324 animals.
- It built capacity for coping with drought through increased awareness and development community skills on animal health and husbandry and on community-based water supply management. The exposure of community members to various drugs and treatments demonstrated to pastoralists the importance of disease free animals in drought conditions.
- The project increased knowledge and skills on animal health and water management with the potential to contribute to better community management and sustainability of local resources and hence improved livelihoods.
- By increasing water points in areas that lacked them, the intervention contributed to the lessening of natural resource-based conflicts among the different community users and in this way, contributed to conflict management and the enhancement of peace in the project area.
- By involving the relevant government ministries i.e. the veterinary and water development departments and community based animal health workers, community-based water user associations and other stakeholders with long term interests in the district in this intervention, this project provided a basis for community ownership and long-term institutional sustainability of its outputs.
- The project did not have a strong link to other on-going emergency animal health and water interventions and resulted in duplication of effort and unnecessary conflict among different agencies working in the area. Had this been well coordinated at the district level, probably by the District Steering Group, (DSG), such misunderstanding could have been avoided. In addition, the project should have seized the opportunity to learn from the lessons from similar projects such as the animal health intervention implemented by CIFA and COOPI, where the aspect of cost recovery in emergency livestock interventions had been clearly worked out and seemed to work quite well.
- The project did not adequately discuss cost recovery aspects with the community and ended up providing free drugs, free treatment of livestock and free water equipment. While this may not have been in itself a bad thing, depending on the status or stage of the drought in the project area, the fact that it had not been adequately discussed and agreed with target beneficiaries resulted in misplaced expectations of *free hand-outs* by the communities. The potential for encouraging the *dependency syndrome* among community members under such circumstances is high. However, it should be noted that this project was to be implemented

at the emergency stage in the drought cycle but due to delay in funding extended to the recovery period.

### **Lessons learnt**

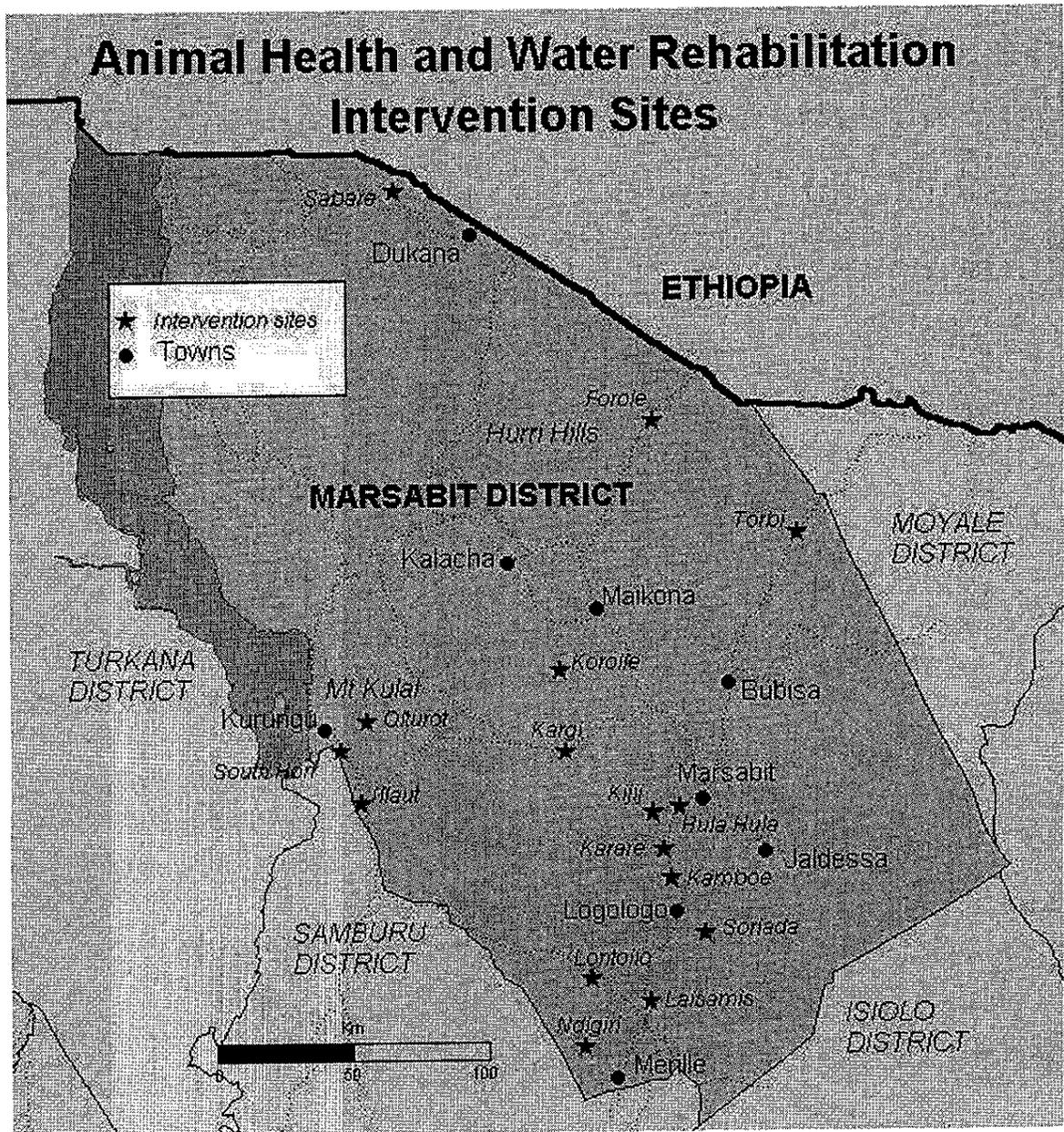
- Even in emergency interventions, sufficient time is required to plan and discuss the project with target beneficiaries in order to clarify expectations and responsibilities and to take into account the nomadic lifestyle. It may require that the implementing agency actually sign contracts with the communities to underscore the importance of the partnership.
- Procurement of equipment such as gen-sets, drugs, vaccines etc. may take longer than envisaged. Special procurement procedures during emergencies are required to ensure that delays in procurement do not affect the implementation of the intervention in the field.
- Communication and sharing information among project staff and with the community, other relief and development agencies in the target area, government officials and other stakeholders at the district and national level is extremely important in coordination and lesson learning and sharing;
- In order to support existing drug supply lines, some of the drug purchases should have been procured from local drugs stores and pharmacies in order to strengthen local business and support the local economy;
- Documentation of lessons and experiences from implementing emergency interventions from the start of the project to the end and the use of such documentation to share and disseminate these lessons is a vital framework for strengthening institutional memory and building ITDG-EA's capacity in implementing emergency operations;
- The need for agencies working in drought/conflict areas to adopt a flexible planning and budgeting approach based on the relief-development continuum. Under this framework, relief activities are closely linked to development and agencies implement activities on an on-going basis irrespective of whether they are relief or development in nature. It is called "a one programme" approach.

### **Recommendations**

1. USAID-OFDA, the Lutheran World Relief and ITDG-EA should consider undertaking an impact evaluation after a year or two to assess the long-term sustainability and impact of the project's outputs.
2. For similar interventions in future, ITDG-EA should ensure continuity of project management in the field as this enhances communication, collaboration and liaison with other stakeholders in the project area and maintains consistency in the project's implementation approach. For this project, there was a very high turn over of the staff in charge of this intervention.
3. Document and share lessons learnt with communities and with other stakeholders.
4. Under ITDG-EA's long-term development programme in the district, follow up should be made in order to strengthen the link between the DWUA, the District Water Actors' forum and the District Steering Group. This will improve the DWUA's capacity as an umbrella organization.
5. ITDG-EA should in future encourage and support the local economy by contracting local suppliers to provide items such as drugs as opposed to what happened in this intervention

where ITDG-EA procured the drugs from Nairobi. The procurement guidelines from the donor would probably not have allowed this at the time. But this is an area where dialogue with the donor should now be established to allow for flexibility in order to enhance effectiveness in implementation in future.

6. ITDG-EA should aim at strengthening the activities of its district conflict management unit.



## 1. INTRODUCTION

### 1.1 Project background

The Emergency Animal Health and Water Rehabilitation Project was implemented by ITDG-EA in Marsabit District, a drought prone area in northern Kenya. The emergency intervention was necessitated by the 1999-2001 drought that was threatening both livestock and the pastoralists who heavily rely on the livestock and their products for their food security and other basic needs. However, it is worthwhile to note that this drought was exacerbated by the weakened pastoral livelihood system, which has been subjected to adverse climatic changes in the last decade. This has further been compounded by institutional and infra-structural weaknesses both at the community and district levels. The crisis started with a drought in 1996/7 followed by the extreme *El Nino* rains and floods in 1997/8 that further destroyed the already poor infrastructure in the area. The effects of the *El Nino* phenomenon were very severe and led to an upsurge of livestock and human diseases, leading to high infection rates and deaths. Recovery from such crises is usually slow but the problem intensified with the *La Nina* phenomenon that led to failure of both the short and long rains of 1998/99 in most parts of the district, except the highlands around Central Marsabit, Mt. Kulal and the Hurri hills.

A food relief emergency intervention was implemented by the WFP through a local lead agency, Food For the Hungry International, (FHI) but this left a gap on emergency interventions related to livestock health and water infrastructure. Around this time also, two of the major agencies (GTZ and FARM AFRICA) working in the area, mainly on animal health and husbandry, were in the process phasing out.

In response to this crisis therefore ITDG-EA together with LWR requested funds from USAID-OFDA to intervene through the Emergency Animal Health & Water Rehabilitation Project with the Goal of strengthening capacity of individuals and institutions to respond to the drought-related crisis in five divisions of Marsabit district.

### 1.2 Project Objectives and Expected Outputs.

The project had the following objectives and expected outputs:

#### Objective 1:

To safeguard pastoral livelihoods by enhancing animal health services in Maikona, Central, North Horr and Loyaingalani Divisions in Marsabit District. (In phase 2, Laisamis, an extra division was added).

#### Objective 2:

To improve access to water by human and livestock populations in the five divisions by 30% and 40%, respectively, from the current consumption levels of about 60L/Household/week and 3 waterings/week/ herd of 50-100 heads respectively.

### 1.3 Project Value and Timeframe

The project was approved for funding by USAID for the sum of USD 662,155 granted to Lutheran World Relief and ITDG-EA was identified as the implementing agency because of

their long presence and experience in Marsabit. Implementation was to be between June 12, 2000 and December 31, 2000 (now referred to as Phase1). Due to the persistence of the drought, a second phase of the programme was approved for funding and the implementation period was extended for a further seven months, targeted to end on July 31, 2001.

#### **1.4 This Evaluation**

The following Terms of Reference formulated by ITDG-EA and USAID guided this evaluation:

- Assess the extent to which animal health had been enhanced in Maikona, Laisamis, Loiyangalani, Central Marsabit and North Horr divisions of Marsabit district;
- Evaluate the extent to which access to water by humans and livestock has been improved;
- Provide recommendations on enhancing linkages between emergency and long term development work;
- Assess the likelihood for sustainability of the project outputs in the longer term;

The full Terms of Reference for this evaluation are given in Appendix II of this report.

#### **1.5 Methodology**

The consultant conducted a thorough review of the documentation pertaining to the project including proposals, progress reports, award documents and correspondence before embarking on the fieldwork. Interviews and discussions were held with the Project Team, both in Nairobi and Marsabit. Some of the people met include:

- The ITDG-EA RAPP programme manager, social-scientist, pastoralist project manager, finance manager, emergency field co-ordinator, the accountant, the community mobilizer, animal health assistant, veterinary officers and the technical water supply officers in the district;
- Beneficiaries, local administrators and pastoralists related to the project;
- Key line ministries and organizations involved in long term development and in emergency operations in the district e.g. the Arid Lands Resource Management Project, (ALRMP), under the Office of the President, Ministry of Environment & Natural Resources - Water Department (ME&NR), Ministry of Agriculture and Rural Development (MOA&RD), Water User Associations (WUAs) and Women groups;
- Other development agencies such as Food for the Hungry International (FHI), Pastoralist Integrated Support Programme (PISP) and the GTZ/Marsabit Development Programme.

The consultant made field visits together with ITDG-EA field staff in order to meet and have discussions with beneficiaries. In addition, this facilitated the physical observation and verification of the quality of water development facilities and provided some insight into the extent to which objectives had been achieved. The consultant then analyzed the findings and produced a draft report presented in an internal ITDG-EA meeting in order to provide an opportunity for the client to input into the process.

## 2. FINDINGS

### 2.1 Animal Health Intervention

**Objective 1: To safeguard pastoral livelihood by enhancing animal health services in Maikona, Central, North Horr and Loyaingalani Divisions in Marsabit District**

The intervention in animal health was expected to address drought-related livestock diseases through the provision and strengthening of animal health services. This was done by:

#### 2.1.1 Providing treatment and vaccination services

ITDG-EA in consultation with the DVO Marsabit purchased animal health drugs from Nairobi. Treatment teams composed of the veterinary and ITDG-EA staff was formed to carry out clinical services and vaccination campaigns in the target areas. The role of the DVO was to provide technical backstopping, quality control and identification of beneficiaries including the community animal health workers (CAHWs). This role was crucial because the DVO, by virtue of coordinating disease control in the district, was in a position to know the extent of the geographical coverage of existing animal health service providers in the district.

The number of livestock targeted was 133,300, which included all livestock species. The total number of cases treated/vaccinated as at the time of this evaluation on August 18, 2001 was 213,306, (160% of the targeted cases). The total district livestock population as at June 2001 was 822,000<sup>2</sup>. The project thus covered 26% of the total livestock population of the District, benefiting nearly 3000 households. Assuming that a substantial proportion of the livestock treated survived the drought as a result of the intervention, the economic benefits of this intervention far outstrip the investments. Even if only 25% of the livestock treated have survived the drought, this would give a total of 53,326 animals. Giving an average price of Kshs. 2000 per animal across all the species, the value of livestock saved would be  $2000 * 53326 = 106,653,000$  Kenya shillings or USD 1,422,040. When this is compared to the cost of both the animal health and water development intervention of USD 662,155, it is evident that it was a worthwhile investment.

#### 2.1.2 Replenishing community drug stores

Another aspect of the animal health intervention involved the replenishing of community drug stores and strengthening the capacity to manage and sustain them to ensure adequate supply of veterinary drugs at community level. ITDG-EA had previously supported the two drug stores by providing drugs under the animal health development interventions in the district. Like many other community institutions, poor leadership and management was a major problem for the drug stores. The project addressed this by providing leadership and micro enterprise training for the two committees. However, it was found that after the training, new committee members were elected in both Forole and Torbi, which were seen as a positive outcome of the training. But the new members required capacity building on micro-enterprise management and leadership, which could not be accommodated within the emergency project. ITDG-EA should therefore consider

<sup>2</sup> Source of information for the livestock figures was the Ministry of Agriculture and Rural Development Office, Marsabit.

linking this emergency intervention to its the long-term animal health development programme in the district.

It is reported (third quarterly report) that drug sales were good in both Forole and Torbi and that the percentage of targeted pastoralists accessing drugs at Forole and Torbi was approximately 25% and 45% respectively. However this evaluation found evidence that contradicted this when the Torbi drug store was visited. It was found to have had only three sales amounting to Kshs. 700 since the beginning of the month and the total value of the drugs in the store was Kshs. 117,000 as opposed to Kshs. 155,133 as reported in March 2001. The summary of the total assets for the Torbi drug store is given below as at March 31, 2001 when compared with the assets at the time of evaluation:

**Table 1: Summary assets of Torbi drug store**

DATE	STOCK	CREDITS	CASH AT HAND	CASH IN BANK	TOTAL
March 2001	39,150	-	46,983	69,000	155,133
August 2001	15,000	9,000	11,000	82,000	117,000

The committee reported that they had set aside a revolving credit of Kshs 10,000 for needy University students from the community and in addition started a small business that catered for the drug attendant's wages. It was also reported that the old committee had drug credits amounting to Kshs. 100,000. However given that ITDG-EA had replenished the store with drugs worth Kshs. 120,000 (committee claims it was 114,000) the current stock level was too low meaning they were incurring losses. On further investigation however, the evaluation mission found that the committee decided to sell the drugs (terming them a "donation") at lower than market rates thus there was no build up capital. The committee claims that they felt people's capacity to purchase was weakened by the drought and instead of the drugs expiring, they cleared them quickly at lower prices, which made it difficult for replenishment of the same volume. The danger of this strategy was that a better off individual could have purchased the drugs to resell at market rates for profit. The store also faced stiff competition from a drug store run by four CBAHWs, one of whom is the chairman of the community drug store.

The project reported that the other drug store in Forolle had shown marked improvement since March 2001 as a result of new management that restructured the store to achieve higher profits and to integrate women in the leadership. Consequently, the store turnover increased from Kshs. 306,000 in March 2001 to Kshs.312,571 in July 2001.

The existence of the drug stores enabled the remotely located pastoralists to access drugs locally and had the potential for improving drug availability if properly managed. The store in Forole in particular was very strategic given the isolation of the area and existence of grazing zones around it. The community needs to tackle the issue of large credits, which is a major constraint to sustaining the stores.

### **2.1.3 Capacity building for the CBAHC system**

In order to increase access to animal health services at the community level, the project targeted training of 60 herders (20 women and 40 men) in order to improve their skills in Community Based Animal Health Care. The herders were to be selected by the community according to

geographic need and potential to serve the community. At the end of the training, each CBAHW was to receive a drug kit composed of non-expendable items for treatment and other services in their communities after which they would continue replenishing drugs from either community stores or commercial drug suppliers.

The evaluation mission found that a total of 78 CBAHWs had been trained compared to the targeted 64. This was an achievement rate of 130 %. This training was done in four phases of one week each and a refresher course after several months of experience. Some of these CBAHWs had previously been trained by other agencies and therefore only received refresher training.

The trained CBAHWs did not receive any drug kits at the end of this training but a few were found to have taken the initiative to acquire some drugs on their own while others used drugs provided by the stock owners. During the treatments and vaccinations, the CBAHWs were deployed and this gave them an opportunity to improve their skills as well as exposing them to the community.

The project purchased a total of 22 drug kits worth Kshs. 15,119 each with plans of distributing these to the CBAHWs but by the time of this evaluation mission, the kits had not been issued out. ITDG-EA planned to issue the kits on a cost recovery basis but a few of the CBAHWs interviewed felt that the kits should be given as a free donation. However the general consensus among agencies involved in animal health activities was that commitment to share the cost even at only 20% community contribution was a better option and provided an indication on the part of CBAHWs to sustain the service as a business. One criterion that could be used in providing these kits would be to target those individuals who already have acquired some drugs on their own or are offering some advisory services. The kits would then be provided on a loan recovery basis. Alongside the kits, business management skills would be provided in order to improve business skills and increase the chances for the viability of the enterprises. To this end, the project team planned to target areas where no drug supply system existed. *Assessments had already been done to that effect, out of which five areas were now being considered for support to start drug stores with these drugs from where CBAHWs could replenish their drugs or hire non-expendable items.*

### **2.1.3 Information Dissemination in Animal Health Services**

**To date, 78 paravets/herders disseminating the animal health information to the herders and community in general**

The trained CBAHWs and herders have been disseminating information and providing basic animal health services and information to the community that aims at enhancing animal health and husbandry practices. Through the trained persons the flow of information between the community and development agencies such as the veterinary department and commercial service providers has been strengthened. The project reported that the channels of communication listed below have been initiated and will be strengthened in the long-term development work;

- a) Paravet to Paravet – There is a deliberate sharing of information on diseases, treatments, provision of services and the charging of services rendered.

- b) Paravet-Paravet-Herder – The main information flow is as above except that herders do not charge for services rendered because they treat their own livestock.
- c) Pastoralists to service providers (trained herders/paravets/project staff/DVO team).
- d) Pastoralists- service providers-private/commercial enterprises.

In addition to the training of CBAHWs, this emergency project also included the improvement of basic awareness on animal husbandry. This was provided (on request) to 23 pastoralists (herders) in the Forole areas among the *Yaa Gara* community. The project also provided training on leadership and micro enterprise management in collaboration with the departments of Social Services and Cooperative Development in order to ensure that drug stores were run as enterprises. It was not clear from this evaluation as to how this would affect the drug supply system as most of those trained had already been voted out of office and the performance of the drug stores was not showing any significant improvement.

In summary, it can be concluded that the project had led to an increase in animal health service provision and to a strengthened drug supply line during the drought period, especially in locations that had very few community workers such as Laisamis Division. In addition, the large number of animals treated resulted in improved livestock body condition in most species and this enhanced their chances of surviving the drought and forming the breeding stock upon which pastoralists would start to rebuild their herds and flocks once the drought was over. As ITDG-EA has a continued development interest and presence in the district, there is potential to link this emergency intervention to long-term development in animal health delivery activities in the district. The strategy of using CBAHWs and the veterinary departmental staff provides a good institutional framework for more long-term work in animal health. Community members trust CBAHWs, especially after seeing their skills and involvement in the emergency interventions, while GoK veterinary staff have a long term presence in the district, probably more than any other relief and development agency staff, although their tasks and job descriptions may change with the advent of a privatized community-based animal health care service.

Difficulties, though, still remain in the areas of district level coordination and monitoring and evaluation of emergency interventions. The aspects of a harmonized approach towards aspects such as allocation of responsibility for response in different geographical locations, cost recovery measures and approaches, lessons sharing and joint discussions, a district-level led planning, response, implementation, monitoring and evaluation strategy and agreement on how to discourage the *dependency syndrome* among community members by providing free services and drugs are all aspects that require attention. Finally, it is increasingly becoming clear that community-owned stores do not appear to be the long-term solution to drug supply provision difficulties in the remote areas and a system should be investigated for encouraging private and individual investment in the animal health sector in the district. The challenge is for the veterinary department, NGOs like ITDG-EA and drug companies to develop a sustainable community animal health service that works on full cost recovery and enables the service providers to make a decent living. The study by the OAU-IBAR CAPE project to be launched in September 2001 should provide more insight into the area of privatized animal health services in arid and semi arid areas such as Marsabit.

## 2.2 Water Intervention

**Objective 2: To improve access to water by human and livestock populations in five divisions by 30% and 40% respectively, from the current consumption levels of about 60 Liters/household/week and 3 waterings week/herd of 50-100 head respectively.**

Due to the prolonged drought and the *El Nino* phenomenon before then, water sources had become inadequate due to either mechanical problems or silting. In particular, boreholes had become non-functional or were frequently being shut down for repairs, resulting in serious water shortages. The drought led to drying up of the available water pans, most of which were seriously silted. Consequently the few operational boreholes were serving larger numbers of livestock and human populations, leading to frequent pump breakdowns due to overuse.

The project responded to the water problems by implementing the following activities:

- establishing an emergency response system to address malfunctioning boreholes;
- rehabilitating surface water sources (shallow wells, pans/dams),
- construction of water tanks;
- capacity building of Water User Associations (WUAs), and;
- fueling water tankers to supply communities with portable water (water tankering).

The findings on the various activities are summarized in Table 2 on the next page;

**Table 2: Summary of emergency water provision activities**

Intervention	Phase 1	Phase 2	Total	Comments
Shallow wells/Spring protection	17	48	65	This has revitalized surface water sources by increasing water collection while fencing and capping has reduced contamination and in general increased access to pasture.
Water Tanks	3	3	6	Work was pending on one water tank for the Merille borehole
Borehole (gensets, piping and pumps)	3	3	6	4 gen sets were on site during this mission while the rest were supplied two weeks later.
Borehole repairs	3	2	5	Rahabilitation of the five bore holes has reduced the likelihood of breakdown of equipment that usually leads to long periods without water for domestic and livestock that can lead to immense losses.
Troughs & Reservoirs		44	44	Have improved livestock watering: as many as 20 cattle can take water at the same time compared to 5 or 6 when using the traditional wooden troughs. The herders also save time they would have spend repairing mud troughs daily.
WUA trainings	1	2	3	Community Action Plans, (CAPs), drawn up after training have had a positive impact for some WUAs as new by-laws have been drawn up and elections conducted to enhance facility management. In addition, the elections have facilitated the integration of women in management committees. However, the election of new officials has created need for further capacity building through training.
Pump house construction	1	1	2	Increased storage space and improved the security of the pump.
Water kiosks	1	1	2	The improvement of water kiosks with extra taps has improved fee collection and enhanced the availability of pump maintenance funds.
Exchange visits	0	1	1	Exposure on successful & sustainable water organization. This has strengthened the DWUA activities.
DWUA emergency equipment.	-	2 mobile gensets	2	One genset on site while one was supplied after this mission. This would bolster quick response capacity by the different emergency response teams formed in the district.

### 2.2.1 Rehabilitation of boreholes and strengthening their management

The project contracted a consultant-Technical Trading Company-during the first month of implementation to conduct a full assessment of the boreholes in the district. This consultant gave a detailed report on existing installations and their condition and status of management of water supplies. The survey found numerous problems attributed to poor management, lack of resources to service or repair machinery and unavailability of spare parts within the district. The consultant recommended various interventions aimed at rehabilitating and strengthening the management of boreholes and other water facilities. This included the training of WUAs, pump attendants, provision of simple maintenance tools, supply of consumable parts at a cost, fencing of sites, repair of old equipment or purchase of new ones and the provision of standby emergency generating sets.<sup>3</sup>

In response to this assessment, the project purchased six generating sets, (3 during phase 1 and 3 during phase 2), and by the time of the evaluation, 3 generating sets were on site while the other three were expected from the suppliers within the month.

The project assisted two communities in renovating pump houses to create more room and to secure them. In addition to providing the generator sets, the project also covered the costs for rehabilitation of piping/plumbing and construction of livestock troughs in four borehole sites to increase the capacity for livestock watering.

However, in some areas the generating sets were not in use but were for standby purposes only. In addition, due to inadequate coordination and monitoring and evaluation capacity at the district level, different agencies including ITDG-EA, coincidentally targeted the same communities as other agencies, with the same relief assistance, thereby causing some misunderstanding and confusion. An example is in Dirib Golbo in Central Marsabit, where UNICEF purchased a more powerful genset of 27 KVA as compared to the 15 KVA set provided by this project. The consequence was that the community preferred to use the bigger generating set despite the fact that it was not fully installed. Still the same community had an older serviceable gen-set, (13 KVA), purchased by INTERAID in 1997. In the consultants view, this did not only create fertile ground for perpetuating the *dependency syndrome* in this community but also established imbalances in the ownership of equipment provided through relief assistance as there were areas within the same region that would have made better use of some of the equipment. In another area, Bubisa, in Maikona Division, UNICEF sunk a borehole within a kilometer of the one supported by this project. Again, this may have devastating effects on the environment, especially if the operations and management of such a borehole was not thoroughly discussed and adequately agreed in writing with the community concerned. The consultant suggests that in future, district-based water development actors need to coordinate and share information in order to avoid the duplication of efforts that could undermine the current and future natural resource base of the district.

### 2.2.2 Rehabilitation of Shallow wells

Shallow wells, which are economical and reliable sources of surface water, are very important in pastoral environments. They have been used over time to provide water for both livestock and domestic uses, and have well-developed systems of management based on kinship. In these areas they form a cultural experience with music and rites around them. In the past they were significant in opening up of wet season grazing areas but with increasing population and need to reduce pressure and degradation around permanent water points, rehabilitation or development of wells has become crucial.

<sup>3</sup> Borehole rehabilitation involved mainly the purchase of a generator set, submersible pump and control panel including the training of community-based technicians in simple servicing and repair of these equipment.

The project aimed to facilitate the deepening or digging of 26 wells, lining /capping and fencing to protect them from contamination during floods on *laggas* through purchase and provision of tools under the custody of Water User Associations /Environmental Management Committees. A total of 65 shallow wells were improved, of which, 46 were now providing water for humans and livestock while 2 were dry despite deepening.

The evaluation mission visited 25 shallow wells in different locations and found them in use mostly for livestock watering. Protection walls raised higher than the flood flow have been constructed which had improved the water quality and prevented regular desilting. Steps have also been constructed and these have made it easier to water livestock especially during the dry season when the water level drops deeper necessitating the use of up to 3 to 4 individuals to get to the water level.

The project paid for skilled labour and materials such as cement while the communities provided non-skilled labour and locally available materials such as sand, hard core and ballast. The evaluation mission found the quality of the work done for most of the wells satisfactory except for a few wells that were done in phase one which have started weathering and cracking. This was attributed to lack of consistent curing by the community as required which seemed likely given that wells done the same time in a different community did not have this problem. The shallow wells component had the most potential in terms of sustainability and ownership as the beneficiaries interviewed do consider this intervention as theirs and take full responsibility for their maintenance.

### **2.2.3 Construction of water tanks**

The project facilitated the construction of six (6) water tanks, one of which was underground. This one was in the Forole area where ground water sources are not feasible. This is one of the areas in the district that was most hit by water scarcity and the nearest water point was 78 Kms away in Torbi along the Marsabit/Moyale highway. The other five water tanks were constructed to complement existing ones at boreholes and at spring wells.

All the water tanks (4) seen during this evaluation were in full use and the workmanship was quite good. Through this activity the project has contributed to increased water storage, able to sustain at least human life during prolonged pump breakdowns. It was reported that the extra storage tanks had made it possible to turn the pumps/generating sets off for sometime in order to avoid prolonged use that leads to frequent breakdowns.

### **2.2.4 Construction of pans/dams**

The project initially targeted to desilt and or expand five water pans. However some changes had to be made due to targeting of the identified pans by other agencies. This led to alternative choices and but the number of 7 pans desilted was higher than target. Manual desilting/excavation by the community was the planned method of work and the project was to provide tools to the community for this purpose. However, for two of these Bubisa (Dambala Ndege pan) and Torbi (Dosa Wachu pan), tractors were hired by the project to do the excavation. The evaluation mission was informed that this was done because of the weak physical condition of the population due to hunger and long distances from the nearest centres.

The importance of the pans however cannot be underestimated as they provide a cheap source of water and open up grazing areas that relieve pressure on areas near settlements. At the time of the evaluation, all the water pans had already dried up as the water lasts for a maximum of six months after favorable rains. The various WUAs were provided with tools for de-silting the pans after every rain season to sustain the seasonal water supply.

Two of the pans namely Qarsa Simiti and Mata-arba were under the management of women groups and provided water mainly for domestic use, thus meeting a practical need for them. In both areas, women have to walk for between 8-10 Kms to the nearest water point so the water pans do provide some relief during and after rains. The other pans are located in wet season grazing areas. This has opened up the areas for use by livestock and reduced congestion on nearby permanent water points.

### **2.2.5 Water tankering**

Tankering of water during this crisis involved trucking water to areas where people depended mainly on seasonal water pans or underground tanks. The project had made some provision for tankering water to affected communities, where appropriate. ITDG-EA had provided water relief in March 2000 to a few communities using privately hired tankers. However this intervention was considered too expensive. It was later confined to providing water construction and excavation work on pans and dams. The project provided six tanker trips for Qarsa Simiti community during the desilting of a water pan. This was in response to the need to reduce women's workload and to save time for the desilting activities. The budget set aside for this activity was therefore not exhausted as only critical situations could warrant the tankering of water.

### **2.2.6 Capacity Building.**

Capacity building in the water sector involved the strengthening of the Water User Associations (WUAs) and skills development in the maintenance of water supply equipment/machinery. ITDG-EA planned to strengthen Environmental Management Committees, (EMCs), and the District Peace and Development Committee, which ITDG-EA envisaged would be the overall body responsible for managing water resources in the district. After conducting training needs assessments, two training workshops were conducted for WUAs in the southern and northern zones on management and leadership. One training workshop was also held for borehole attendants on basic equipment maintenance skills in order to ensure better care for equipment and reduce unnecessary breakdowns.

The evaluation mission found that the project facilitated two consultative forums for Water Users Associations (WUAs) in order for members to brainstorm on issues of common interest. One prominent issue was the unavailability of spares locally and the expense of sourcing them externally. The outcome of these deliberations was the formation and registration of the District Water Users' Association (DWUA) with interim officials. The project facilitated one exchange visit for the DWUA to Wajir district for exposure on water and natural resources management. After the exchange visit the department of water development gave the DWUA an office and storage space to start a spare parts facility. The project had also provided the DWUA with three mobile gensets (one already on site while two were still expected from the suppliers) to take care

of emergency breakdowns. These would be hired out to needy boreholes at a fee and ensure continued water supply even when breakdowns did occur. In addition, UNICEF through the water development office, donated fast moving spares and fuel for one year. Support for the DWUA was also being sought from other actors. Unfortunately, a few of the actors, in particular FHI reported that they were not aware of the DWUA but the project team reported that they informed all stakeholders but some chose not to collaborate. For reasons of long-term sustainability and efficient use of resources, it is advisable to involve all actors in water development activities through the coordination of the District Steering Group (DSG), the DDC sub-committee charged with drought-related issues in the district.

ITDG-EA supports the activities of the District Peace and Development committee but this is not yet linked to the coordination of water development activities. The district authorities should consider consolidating the two aspects, preferably under the auspices of the DSG. This is an aspect that ITDG-EA could contribute to via its development programme in the district in order to strengthen the institutional and organizational development of the relevant actors in the district.

Table 3 below presents a summary of progress in the production of outputs based on the indicators in the original logical framework.

From this table, it is clear that in general, both outputs were achieved. All the planned targets and activities were realized, although there were a few outstanding issues that needed further attention. On animal health, more work and emphasis will need to be put into utilizing the remaining drugs/vaccines issuing of the drug kits to the CBAHWs on a cost-recovery basis. In the water facilities rehabilitation component, there is need to finalize outstanding activities such as the fixing of water pumps and transporting/handing over the remaining gensets. The DWUA that has been formed is still at infancy stage and may require considerable capacity building and support before it is able to provide services to members in an effective, efficient and sustainable manner. These aspects should be integrated into ITDG-EA's on-going pastoral development programme in the district, as there is a strong link between this relief project and on-going long-term development work. At the same time, the need for district-level coordination requires attention. The district water development service providers forum should be re-activated, as part of the DSG's initiative, to develop a harmonized approach and strategy for water development activities in the district.

Table 3 - PROGRESS IN THE PRODUCTION OF PROJECT OUTPUTS AS AT AUGUST 2001.

NARRATIVE SUMMARY	PLANNED TARGET	ACHIEVEMENT	COMMENTS
<p><b>GOAL</b></p> <p>To reduce community's vulnerability to drought.</p>	<ul style="list-style-type: none"> <li>Animal Health services enhanced</li> <li>Access to water by human and livestock populations improved.</li> <li>Capacity of the community to respond to disaster improved.</li> </ul>	<p>Animal health services were enhanced through training of CAHWs and awareness creation for herders. Access to water was improved through rehabilitation of water sources and capacity building on efficient management. As a result of the strengthened community groups and resource persons, the community is better prepared to respond to disaster.</p> <p>The project covered 173.3% of targeted livestock by end of the project period.</p> <p>All human and livestock populations were accessing water within a period of 3 days or less.</p>	<p>The project has potentially contributed towards the achievement of the goal but the long-term performance and sustainability of individuals and institutions supported is what will determine the long-term impact. An impact evaluation 1 or 2 years later would help to assess the preparedness level of the community to withstand drought.</p> <p>In the short term, the project contributed to reduction of community vulnerability to drought as the health of animals targeted was improved and water supply and management strengthened.</p> <p>The long-term security of the community's livelihood will depend on how much the pastoralists make use of the skills and knowledge gained on animal husbandry and the level of sustainability of the water points.</p>
<p><b>PURPOSE</b></p> <p>To strengthen the local capacity of individuals and institutions to respond to drought related disasters in four divisions of Marsabit District.</p>	<ul style="list-style-type: none"> <li>Health of at least 60% of the targeted livestock attended by end of the project period.</li> <li>At least 40% of the human and livestock populations accessing water within a period of 4 days.</li> </ul>	<p>213,306 livestock (about 160% of the targeted 133,300 cases) were treated for twelve different diseases and infections (E/parasites, Tryps, Worms, Mange, Pneumonias, Unthriftness, Babesiosis, Anaplasmosis, Eye infections, Wounds, Abscess and Pox) by end of project period. Although no records were available, more animals were treated as a result of drug availability in drug stores.</p> <p>This was not quantified and information was never collected. However the training of extra CBAHWs has enhanced availability of advice on animal health services</p>	<p>The highest cases were Worms 77%, followed by E/Parasites at 7.6% and Tryps 5.5% while the lowest treatments were for Wounds and Anaplasmosis at 0.02% and 0.01 % respectively. A further 20,444 cattle and sheep were vaccinated for Foot and Mouth Disease in central and Laisamis divisions.</p> <p>Due to lack of a baseline survey it is difficult to estimate the percent change as a result of this project's intervention.</p>
<p><b>OUTPUTS/OBJECTIVE</b></p> <p>1. To safeguard pastoral livelihood by enhancing animal health services in Maikona, Central, North Horr and Loyaingalani</p>	<ul style="list-style-type: none"> <li>At least 60% of targeted cases treated by disease type and species by end of 6<sup>th</sup> month.</li> <li>At least 40% of households in the target population, receiving advice on animal health services by end of the 6<sup>th</sup> month.</li> <li>Percentage of targeted pastoralists accessing drugs from community drug stores at Forole and Torbi improved by 40% from the current level of about 10% by the 6<sup>th</sup> month.</li> <li>At least 70 % of the targeted CBAHWs/herders trained by the 6<sup>th</sup> month.</li> </ul>	<p>Data on this indicator was not collected. Information in one of the reports showed that approximately 25% and 45% of pastoralists were accessing drugs at Forole and Torbi. Evidence during the evaluation did not confirm this. The usage of the drug store seemed very low but this could be due to the dry weather when drugs sales are relatively low. However the stock levels are too low to cover the population of the areas.</p> <p>130% of the targeted Para vets/herders trained by end of project. A total of 78 of the targeted 60 (20 women and 40 men) CAHWs have been trained.</p>	<p>This target has not been met and ITDG-EA needs to do further assessment and analysis of the performance of the drug stores and come up with a decision on the best sustainable drug supply system. Communally owned and run drug stores in these areas tend to perform poorly compared to individual drug enterprises.</p> <p>Since they were not issued with drug kits their contribution to animal health was reduced. The project should address this issue urgently. Their involvement in treatment and vaccination campaigns boosted their acceptance in the community but issuance of certificates, which was not done as promised, would give them more credibility.</p>

<p>2. To improve access to water by human and livestock populations in the four Divisions by 30% and 40%, respectively, from the current consumption levels of about 60L/Household/week and 3 watering/week/herd of 50-100 heads respectively.</p>	<ul style="list-style-type: none"> <li>▪ At least 70 % of the targeted water pans fully desilted by end of the 6<sup>th</sup> month.</li> <li>▪ At least 70 % of the targeted wells/springs rehabilitated/protected by end of the 6<sup>th</sup> month.</li> <li>▪ Two underground tanks constructed by the end of 6 months.</li> <li>▪ Average water consumption levels for the target populations raised by 30% for humans and 40% for livestock respectively by the 5<sup>th</sup> month . Current levels average 60L/household per week for domestic use and 2 watering/week for livestock.</li> <li>▪ At least 70% of the targeted members of Water Users' Associations trained by end of 6<sup>th</sup> month.</li> </ul>	<p>102% of the targeted water pans were fully desilted by end of the project.</p> <p>185% of the targeted wells rehabilitated by the end of the project (65 wells out of targeted 35).</p> <p>Only one underground tank was constructed.</p> <p>The target populations reported that all their need for water both for domestic and livestock use was met adequately. The differences are that less time is spent collecting water or watering animals due to increased capacity and the construction of troughs. On average most households consume 100/household per week for domestic use and 3 watering/week for livestock.</p> <p>Over 80% of the targeted members of WUAs were trained by end of the project.</p>	<p>The water pans were dry but desilting has significantly increased their capacity. The use of the more costly motorized power as opposed to manual labour for desilting two water pans reduced the achievement.</p> <p>This was one of the intervention activities with the highest level of community contribution, which accounts for high achievement. Most of the wells are owned by individual households but are used communally.</p> <p>Second site found unsuitable and was therefore abandoned.</p> <p>There is more efficient use of water due to the improvements on the water infrastructure. There is also reduced likelihood of discontinued supply due to breakdowns. Less time is being spent on watering activities saving time for other activities and grazing for livestock.</p> <p>Some WUAs elected new members after the training workshops. Capacity building of WUAs will be strengthened through the DWUA.</p>
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### 3. IMPLEMENTATION PERFORMANCE & PROJECT IMPACT

#### 3.1 Implementation performance

This section presents the consultant's rating of implementation performance and impact of the project based on the issues that needed to be addressed in the Terms of Reference. The results shown in the table below were produced by ITDG-EA staff that worked closely in this project from an analysis the consultant prepared a pro-forma for scoring each aspect of implementation and expected impact. The consultant then scored the project's performance based on her own judgement and the information available at the time. Then each member of staff was given the sheet to score on an individual basis. It should be noted that some of the score may be based on the way people understand the questions and may not reflect their correct perception of the performance.

**Table 4: Summary of project implementation performance and impact**

IMPLEMENTATION ASPECTS	1	2	3	4	5
Funding flows, procurement and disbursement procedures			.		
Functioning and sustainability of project activities and management by community			.		
Capacity building of local institutions (such as WUAs & drug committees, CBAHWs)		.			
Level of women participation in the project in general and in community management.			.		
Level of local participation in the project, materially, financially, in decision-making, monitoring and evaluation.			.		
Efficiency of resource use (planned budget vis a vis actual budget)		.			
Level of information sharing and collaboration between:					
ITDG-EA, LWR & OFDA		.			
Trained community members		.			
Project staff			.		
ITDG-EA, the line ministries and other Agencies			.		
Beneficiaries			.		
Other relief and development agencies in the district/national level				▪	
Appropriateness of the project's approach vis a vis GoK policy and or other development agencies on relief and development.			.		
Documentation and dissemination of lessons learnt so far				.	
Extend to which outputs have been produced		.			
Likelihood of achieving project goal and objectives		.			
Long term sustainability of project outputs			.		
Overall implementation performance	Average score = 2.68				

**Scoring code:** 1. Very good, 2. Good, 3. Satisfactory, 4. Poor, 5. No basis or available evidence

The scores show that overall, the project performance was good (at 2.68 out of a possible score of 1). Performance in two main areas, *documentation and dissemination of lessons learnt* and the *fostering of district/national-level coordination, collaboration and partnerships* were considered poor, although it was noted that this was an emergency intervention and there was pressure for time. Documentation and dissemination of lessons learnt and ITDG-EA's experience in implementing this intervention has the potential of contributing to both local and national level knowledge and institutional memory on drought management. It is also significant that no implementation or impact aspect got a score of 1. This is because the majority of the respondents, (both beneficiaries and other stakeholders), perceived that performance was satisfactory. Similarly, 4 members of the implementation team from the department of water development and the Ministry of Agriculture and Rural Development gave the project an average score of 2.5. The project was thus seen to have been implemented well and would likely produce the desired results and impact.

However, there were concerns that the project did not share information with other stakeholders especially NGOs implementing activities in the same locations. There were feelings that the approach of providing cost free treatment and vaccination was against government policy and approaches of other development agencies. While it is too soon to predict the impact of this approach, the majority of those interviewed felt that the project perpetuated the *dependency syndrome*. It was felt that since this intervention was being implemented during the drought recovery stage in some locations, some form of cost recovery should have been built in to encourage community self-reliance. The consultant is of the view that adequate discussions on cost recovery measures should have been undertaken and agreed with communities and with other stakeholders in the district in order to avoid misunderstanding. This issue however, would not arisen if the project had been implemented as planned during the emergency stage of the drought cycle.

The procurement and disbursement procedures were considered good but at the same time were blamed for delays as consultations took too long thereby delaying activities. However, the consultant was satisfied that the procedures were good and that there was efficient use and control of project resources. Nevertheless, circumstances beyond the control of the project such as unavailability of drugs and equipment locally did delay quick response to the effects of the drought.

### **3.2 Impact of the project**

The project made significant impact in the target area. The evaluation found that various aspects of the project contributed positively towards the improvement of local capacity to manage the effects of drought and improve livelihoods. The beneficiaries and the teams involved in the various activities also perceived that the project outputs and results had positive impact. The following impact was evident:

- ❖ Water was made available and more easily accessible to the vulnerable communities and livestock. This saved lives and provided a framework through which the pastoral production system could recover much more easily from the negative impacts of this prolonged drought. The improvement of shallow wells and desilting of water pans in particular contributed to

- opening up of under utilized rangelands, which reduced pressure on areas around permanent water points and consequently improved environmental management;
- ❖ The project, by establishing the DWUA has provided an avenue through which capacity for water development and management in the district can be strengthened and coordinated;
  - ❖ The emergency intervention salvaged livestock assets, thereby strengthening and enhancing the recovery process of the pastoral production system. The number of livestock which would have been lost had the intervention not been implemented is approximated at a value of over 2 million US dollars. When this is compared with the amount spent on the intervention, it makes economic sense to have intervened in this way;
  - ❖ The improved body and health condition of the animals as a result of this intervention enhanced the capacity of the animals to withstand the effects of the on-going drought and increased the potential for better production from the animals;
  - ❖ The intervention strengthened community capacity for coping with drought through increased awareness and development of skills on animal health and husbandry. The exposure of community members to various drugs and treatment and the use of CBAHWs during this drought strengthened the potential for a decentralized and privatized community-based animal health care service;
  - ❖ The project increased knowledge and skills on animal health and water facility management and maintenance, with the potential to contribute to better community management and sustainability of local resources and hence improved livelihoods;
  - ❖ There was improved security in the district through the increase of water and range resources that would usually cause natural resource based conflicts arising from competition for scarce resources.

### 3.3 Security

The project area experiences occasional conflicts resulting from competition over scarce resources such as water and pasture. However, conflicts are of a retaliatory nature and occur mainly between ethnic groups as opposed to banditry. The project therefore operated in a situation where security or insecurity had a significant impact.

#### 3.3.1 Effect of insecurity on the project

There was detrimental impact on the project due to insecurity. The project had to change target areas or postpone activities in some cases. After some assessment, one area (Koya), which is rich in pasture but lies in a banditry zone between Marsabit and Isiolo district could not be covered as the area was declared a *no-go-zone*.

Around the Marsabit mountain area, inter-ethnic tensions between the Borana and the Rendille communities delayed the operation of activities for about three weeks as the project could not risk doing any work there. There were also direct attacks on project personnel and vehicles. One vehicle transporting drugs was shot at on the way from Nairobi to Marsabit while one of the contractors working for the project was attacked and his wife killed. This led to the re-scheduling of activities and shortening of working time as activities could not go beyond 5 P.M. The project therefore incurred more expenses due to the extra time and precautions. For instance, a plane had to be chartered at one time to ensure safe transportation of vaccines while armed security guards were hired to accompany teams on bandit prone routes such as Bubisa along the Marsabit - Moyale highway.

### **3.3.2 Impact of the project on security**

The project contributed to improvement of security in the district by increasing the water and range resources that usually cause conflicts. In most areas, pastoralists expressed satisfaction with the available water resources and could not see a situation where they would have to migrate to other communities to share water except in areas where they had always shared water such as the camel watering wells at Korole in the Chalbi desert.

The project has tried to use WUAs to manage conflicts that emanate from shared or scarce resources. The members of WUAs who are also in peace committees bring in management and leadership skills that the project has provided. Thus the project has indirectly contributed to conflict management. In addition the District Water Users Association, being an umbrella body plans to mainstream peace in their activities as well as playing an advocacy role on pastoralists' issues.

In addition, ITDG-EA has on-going work on conflict management and peace building through its pastoralist development project. Several workshops on peace and conflict management have been held with representation from Marsabit. It is expected that this intervention will find long-term solutions to the conflict issues and result in security in the pastoral areas. The socio-economic benefits of security on the livelihoods of the pastoralists cannot be overemphasized and the strengthening of peace building activities would go a long way in improving the socio-economic welfare of pastoralist groups in the district.

## **4. ISSUES ARISING FROM IMPLEMENTATION**

This section outlines the issues that have arisen as a result of implementing the project. These issues are points of information for project management and are not necessarily recommendations. The consultant is of the view that if taken into account, these would contribute significantly to improving the sustainability of project outputs and its impact.

### **4.1 Obstacles to implementation**

The project had clear rules and regulations that were well followed. The procurement and tracking procedures contributed significantly to efficiency of resource use. However, it was felt that the procedures were not appropriate for an emergency intervention that required fast action. For instance, the veterinary team alerted the project about an outbreak of Foot and Mouth Disease in April and the procurements was not done until June/July, by which time, the epidemic had become widespread. There were also difficulties with providing consistent and continues management of the project due to the high turn over of staff assigned to the project. These changes undermined the consistency in approach and the relationship between the project and the beneficiaries. For such a short-term intervention, it would have been beneficial to maintain continuity in responsibility and decision-making at the project level. The project had as many as three different managers over a period of six months. There was also a different management set-up between phase one and two.

### **4.2 Community participation and involvement**

The project through the various quarterly reports has given substantial evidence of community participation. The consultant is satisfied that there was adequate community participation in the

project, materially and to a small extent, financially. However, in terms of decision-making, the community was not fully involved especially when it came to activity schedules. There were feelings that the timing of activities, especially on animal health was decided by the project with very little community participation and this limited the numbers of livestock accessed. The consultant was however concerned by the perception of the community beneficiaries that the project should have done more. There were numerous requests for extra support even in areas where the project had done so much, which points to a negative precedent. ITDG-EA will have to do some sensitization on why there was need for a free emergency response and re-orient the beneficiaries to self-reliance such that they contribute or cost share in future development interventions.

The project should also have involved the community in monitoring and evaluation by designing together with the community simple monitoring and evaluation indicators. The consultant therefore proposes that ITDG-EA puts in place a simple community based monitoring and evaluation system that will be used to provide information on issues of sustainability and long-term impact of the project.

### **4.3 Sustainable drug supply lines**

There has been quite a debate among stakeholders on Sustainable Animal Health Care for the pastoral areas, especially the remotely located and underserved parts of pastoral districts. The project should have taken note of some of the lessons learnt by others and also conducted assessment and inventories of the service provision. While there exists a variety of animal health providers with different approaches, there is a wide consensus that the only sustainable form of animal health service delivery is a private one, professionally supported to ensure that quality is not compromised but with enough incentives/profit for the private entrepreneur. In order for CBAHWs to provide quality services and be widely accepted, they will need full support of government policy and standardized approaches.

The consultant observes that there was sufficient evidence to show that communally owned drug stores as opposed to private drug supply systems either through CAHWs or *Dukas* were not sustainable. For example, the community drug stores were meant to have established a revolving fund from the drugs donated by this relief operation. But because of the *dependency syndrome*, they were unable to build their fund or replenish their stocks. ITDG-EA has been involved in lesson sharing and policy influencing activities on Decentralized Animal Health Care and would be best placed to spearhead the adoption and implementation of private health care delivery systems for pastoral areas on a full cost recovery basis. There were concerns that the free drugs undermined local capacity and initiatives. Some of the stakeholders interviewed felt the project could have contributed towards community capacity by supporting the local drug supply system through sub-contracting the local suppliers that would have increased the cash flow in the district.

### **4.4 Social capital formation**

The project was involved in capacity building of local institutions involved in water and animal health services such as WUAs, drug store committees, CBAHWs/Herders' groups. Due to the short project period, most of these groups were still "young" and had received only initial

training with minimal follow-up monitoring or refresher courses. In addition, the CBAHWs did not receive a starter drug kit.

The DWUA umbrella body was a step towards strengthening community organization but this association is also still “young” and fragile. Who will continue to strengthen it? Is this one of the issues ITDG-EA would be interested in linking to their long-term development intervention? If so, it needs a strategy for social capital formation that aims to strengthen community vision, cohesiveness, civil rights and bargaining power.

#### **4.5 Collaboration with the GoK and other relevant stakeholders**

The government of Kenya was very instrumental in the implementation of this project through the Departments of Water and Livestock Development at the district level. The veterinary treatment teams in particular worked with the project team and trained CBAHWs on both treatment and vaccination activities. They were also the main players in the identification of the people to be trained, as they knew where different agencies had worked before. Similarly the water team was instrumental in the water resource assessments and provided technical backstopping during the water interventions.

The consultant is however concerned that this collaboration did not enrich the project in terms of joint-decision making and harmonization of approaches. The project suffered from misunderstanding with other agencies in terms of targeting of borehole equipment. Why didn't the Ministry play a coordination role to avoid duplication? In future ITDG-EA may want to consider support to strengthening the District Steering Group. The established collaboration mechanisms should be used to provide follow-up, monitoring and evaluation of the trained community and district-based resource persons and the local institutions involved in the project.

#### **4.6 The need to Document Lessons Learnt**

The project did not have provision for documenting or disseminating lessons learned but there may be need to do so in order to contribute to the knowledge and institutional memory on drought management in Kenya. The project has experience and lessons learnt with potential to influence emergency interventions, which need to be documented and shared with policy makers and other stakeholders. It is therefore suggested that the donor considers funding ITDG-EA to document and disseminate the lessons learnt from this Emergency Water and Animal Health Project.

#### **4.7 The project's timeframe.**

The consultant was concerned that the activities were congested into a few months whenever purchases were completed. The time taken in processing project approvals, disbursements and procurements seems not to have been factored into the project time frame. For example, the scheduling of this final evaluation, while activities were not complete is an issue that should be avoided in future interventions. It is suggested that USAID-OFDA, LWR and ITDG-EA consider undertaking an impact evaluation after a year or two to assess the long-term

sustainability and impact of the project especially to determine its effects and impact at purpose and goal levels.

#### **4.8 Lessons learnt**

- Even in emergency interventions, sufficient time is required to plan and discuss the project with target beneficiaries in order to clarify expectations and responsibilities and to take into account the nomadic patterns. It may require that the implementing agency actually signs a contract with the communities to underscore the importance of the partnership.
- Procurement of equipment such as gen-sets, drugs, vaccines etc. may take longer than envisaged. Special procurement procedures during emergencies are required to ensure that delays in procurement do not affect the implementation of the intervention in the field.
- Communication and sharing information among project staff and with the community, other relief and development agencies in the target area, government officials and other stakeholders at the district and national level is extremely important in coordination and lesson learning and sharing;
- In order to support existing drug supply lines, some of the drug purchases should have been procured from local drugs stores and pharmacies in order to strengthen local business and support the local economy;
- Documentation of lessons and experiences from implementing emergency interventions from the start of the project to the end and the use of such documentation to share and disseminate these lessons is a vital framework for strengthening institutional memory and building ITDG-EA's capacity in implementing emergency operations;
- The need for agencies working in drought/conflict areas to adopt a flexible planning and budgeting approach based on the relief-development continuum. Under this framework, relief activities are closely linked to development and agencies implement activities on an on-going basis irrespective of whether they are relief or development in nature. It is called "a one programme" approach.

### **5. LINK BETWEEN EMERGENCY AND LONG-TERM DEVELOPMENT**

The emergency project implemented activities that have a strong link to long-term development initiatives and ITDG-EA, communities and other stakeholders in the district should capitalize on this fact. The majority of stakeholders felt there was need to strengthen the capacity of communities to deal with disasters such that resources are not used repeatedly on the same interventions.

#### **5.1 Moving towards a Drought Preparedness Approach**

The interventions in animal Health and Water development, if continued under a long-term development programme have the potential to safeguard pastoral livelihoods on a long-term basis. Access to animal health services and a sustainable drug supply system, coupled with sensitization on better animal health care and husbandry can ensure more benefits such as improved livestock productivity. A long-term animal health intervention should include more awareness on the importance of preventive rather than curative animal health care and the establishment of a sustainable quality decentralized animal health care delivery system. The

initial work done in the emergency project has introduced ITDG-EA into areas where it was unknown and this provides an opportunity for further development of this work

Similarly, the water interventions can be strengthened to reduce vulnerability to disasters. The work with WUAs and the establishment of a DWUA has created capacity for community organization. There is improved supply and management but these efforts need further monitoring and coordination. The focus for future water interventions should shift from boreholes to dams and pans in the grazing areas so as to reduce dependency on the more costly boreholes and also to reduce pressure in settled areas. Only strategic and high yielding boreholes should be prepared and made operational during times of crisis. Water tankering, although considered unsustainable, is an emergency intervention that helped save lives.

Another area of focus should be poverty reduction as some stakeholders suggested that pastoralists are becoming poorer and poorer with every drought. In order for this trend to be reversed, intervention need to make the more prepared by enhancing their coping mechanisms. This may necessitate a review of successful and tested coping mechanism and further surveys of ground water in areas with abundant pasture.

## **5.2 Strengthening the private animal health service delivery system**

One of the issues raised from this project was that of sustainable animal health service delivery. The project contributed towards this by training CAHWs, who will be the service providers at community level. Future development work should involve preparing the service providers and communities to adopt a commercial approach to service delivery and consumption. Another role would be that of capacity building for professional supervision and coordination. Some stakeholders strongly recommended the strengthening of the local drug supply system and the harmonization of approaches including making an inventory of CBAHWs.

## **5.3 Improving collaboration between the various Stakeholders.**

There were many concerns about duplication of interventions that compromised efficiency on resource use. Collaboration and information sharing is considered very crucial in building capacity of pastoralists to deal with natural disasters. The majority of stakeholders however felt there was a low level of networking and collaboration on activities. Based on their experience in implementing this project, ITDG-EA should consider taking a leading role in coordinating various actors to share and document lessons that can be used in influencing policy on issues affecting pastoralists' as well as donor attitudes. A long-term activity in this area could be occasional papers on lessons emerging from interventions by various actors or facilitating regular consultative fora on issues such as drought cycle management, conflict management/resolution etc. The simplest but very important activity in this area could be the strengthening of the DSG in order to assist it to effectively undertake the role it was meant to play.

## **5.4 Capacity building Activities**

The project was involved in capacity building for social organization but due to the nature of emergency activities this could not be taken very far. Community profiles, strengths, and weaknesses have been identified among the various groups and local institutions (such as WUAs & drug committees, women groups and CAHWs). A long-term intervention would be further capacity building and strengthening for enhanced community organization and development. The

issue of sustainability should be addressed here if the communities are to be empowered (through sensitization, exposure and skills development) enable them go beyond their involvement in short-term relief assistance programmes.

## **6. RECOMMENDATIONS**

1. USAID-OFDA, LWR and ITDG-EA should consider undertaking an impact evaluation after a year or two to assess the long-term sustainability and impact of the project especially on the purpose and goal levels. This is because the time between implementation and the final evaluation was too short to allow the complete effects and impacts of the project to be determined;
2. In future, ITDG-EA should try as much as possible to maintain consistency in project management. The consultant observes that the turnover of the staff that managed this intervention was too high. This created liaison difficulties with district authorities and communities and undermined continuity and consistency in managing the project;
3. Documenting and sharing of lessons learnt with stakeholders should be undertaken for two reasons. First, this is the first emergency intervention ITDG-EA is implementing since it has always been regarded as a "development" rather than a "relief" NGO. The documentation of the lessons learnt is thus extremely important for its own institutional memory. Second, this would facilitate and help other agencies to learn from ITDG-EA's experience;
4. The project should ensure there is a decent exit strategy that is understood by all stakeholders and community groups. Probably, a special DSG meeting should be held for the project staff to share information on the results and effects of the intervention and to formally announce its completion. In this manner, the project may receive feedback from the community and other stakeholders on how it performed;
5. The project should follow up and link the DWUA to the District water actors forum in order to increase the chances of this organization to grow and become effective;
6. In future, ITDG-EA should include all relevant stakeholders in the planning of any new short term or long-term interventions starting with a stakeholder analysis and attendance of coordination meetings and other regular forums;
7. ITDG-EA should encourage and support the local drug supply system through local and enterprising Animal Health Providers by using them as suppliers of drugs required during emergencies instead of procuring these from Nairobi;
8. ITDG-EA should look for ways of strengthening the activities of its conflict management unit as it proved a very useful instrument in reducing ethnic conflict over the use of natural resources even during this short-term emergency intervention.

## Appendix I Itinerary and Interviewed

Date	Place	People seen	Notes
02.8.01	ITDG-EA Regional offices, Nairobi	Isabella Masinde -RAPP Manager, Irene Njumbi - Patoralists Project Manager and Joseph Githinji – RAPP Social Scientist	Understanding between consultant and the RAPP team on TORs and Work plan
06.8.01	ITDG-EA Regional offices, Nairobi	Joseph Githinji – RAPP Social Scientist, Irene Njumbi - Patoralists Project Manager	Background information and relevant documents given to consultant.
07-08.8.01	ITDG-EA Regional offices, Nairobi  ACACIA offices	Yusuf Abedi Gedi – Water technician Yobesh Amoro – Finance and Administration Manager. Review of project documents.	Knowledge of project by consultant strengthened  Preparations for fieldwork.
09.8.01	A.M Fly Nairobi - Marsabit.  Marsabit ITDG-EA Offices  Ministry of Water Development – Marsabit	Simon N. Munyao – Project Coordinator. Ali Mohamed Adan – Water Technician. Wanja Boore – Project Accountant. Talaso Chucha – Community Mobiliser. Abdi Abdile – Deputy Water Engineer.	Meeting with project team to plan the field itinerary. Brief on project status
10.8.01	Korole, Kargi, Allam and Kurkum, Loyaingalani Division	Adano – Animal Health Technician, ITDG-EA Marsabit. Dr. Mungathia – Veterinary Officer Marsabit. Various beneficiaries. Andrew Masso – CAHW, Kargi David Wambile –Assistant Chief, Kargi. 11 members of Kargi WUA including Chairman - Dadio Arabelle and Secretary Ali Turga	Witnessed treatments at Korole  Visited Allam & Kurkum shallow wells.  Discussions with Kargi WUA
11.8.01	Dirib Gombo, Central Division  Qarsa Simiti pan rock catchment	12 members of WUA committee (4 women, 8 men)  (No one at the site)	Visited Dirib Gombo borehole, Shallow wells, Qarsa Simiti rock catchment and Aite

	Aite Spring well, Marsabit Town	5 WUA Committee members (3 W, 2M) Chairman , Mzee Isaak Orto).	spring and held discussions with users and committee members.
12.8.01	Marsabit Town		Ordering and Recap of findings
13.9.01	Bubisa and Torbi , Maikona Division	6 WUA committee members 3 CAHWs and Chief, Bubisa Location	Visited Bubisa Borehole, Torbi Drug store and Dosa Wachu pan
14.8.01	Merille, Laisamis and Logologo, Laisamis Division	36 Community members 2 CAHWS community 1 AHA	Discussions on Animal Health interventions in the various areas and met WUA in Logologo
15.8.01	Kalacha, Maikona Division	10 Community members 5 CAHWs	Discussions on Animal Health interventions
16.8.01	Marsabit Town ALRMP Offices FHI Offices MOA&RD MDP/GTZ Offices	Godana Doyo, Community Development Programme Officer – ALRMP, Marsabit Stephen Galgalo, Water Coordinator, FHI Abdullahi Wario, DAPO Dr. Wamwere Njoroge, Project vet MDP/GTZ & implementing officer KARI-MDP/GTZ Ethno Veterinary Research Project Mr. Wario Guyo – Logistics Officer, PISP Dr. Zachary M. Mwaura – Deputy DVO, Marsabit	Information collected from various stakeholders.
17.8.01	Travel to Nairobi		
27.8.01	ITDG-EA - Office, Nairobi	Simon N. Munyao	Clarification on
28.8.01	ITDG-EA - Office, Nairobi	Irene Njumbi, Patoralists Project Manager	Debriefing on the field work
14.8.01	ITDG-EA - Office, Nairobi	ITDG-EA RAPP Team	Report presentation

## **Appendix II      Terms of Reference**

### **1. INTRODUCTION**

The final evaluation of the above project covers the period June 2000 to July 2001. During this period, ITDG-EA received funding for implementation of an emergency animal health and water rehabilitation project that covered five divisions in Marsabit, namely Central, Maikona, Loyangalani, North Horr and Laisamis Divisions.

ITDG-EA is the implementing organization while LWR is the project holder. OFDA was the funding organization. The contract document was a project content of some of the activities was done to reflect the changing situations and circumstances as indicated in the project documentation process.

### **2. OBJECTIVES OF THE EVALUATION**

- a) To assess the extent to which animal health has been enhanced in Maikona, Loyangalani, Central Marsabit and North Horr divisions of Marsabit district.
- b) To evaluate the extent to which access to water by humans and livestock has been improved.
- c) To study and provide recommendations on enhancing linkages between emergency and long term development work.
- d) To assess the extent of the in-building of sustainability into the project.

### **3. SPECIFIC TERMS OF REFERENCE**

The monitoring and evaluation consultants(s) will assess the project in respect to:

- b) The extent of capacity building of local institutions involved in water and animal health services such as Water Users Associations and Drug store committees, paravets/herders groups.
- c) The extent of local participation in the project, materially, financially, in decision-making, monitoring and evaluation.
- d) The efficiency of resources use, input-output correlation on specified budgetary line items and the extent to which key activities have been completed satisfactorily.
- e) The extent of information sharing and collaboration between implementing partners, trained community members, project staff, the line ministries, beneficiaries and other stakeholders.
- f) The extent to which vulnerability of the community has been reduced through the emergency intervention.

### **4. OUTLINE OF THE EXPECTED METHODOLOGY**

The evaluation will use appropriate methods to collect data for analysis to meet the objectives of the evaluation. The data collected should bring out the relationships between inputs and outputs, project implementation process and justify impact of the project through the monitoring and evaluation indicators. The evaluation team is therefore expected to:-

- a) Conduct a thorough review of the available documentation of the project.
- b) Interview project team, Programme Manager, Social scientist, Project Manager, Finance Manager, Field Co-ordinator, Community Mobilizer, Animal Health Assistant, Technical Vet. Officers and Technical Water supply officers and any other key person deemed crucial for the purpose of this evaluation.
- c) Interview the beneficiaries, individual households and pastoralists related to the project.
- d) Interview key stakeholders, institutions and organizations involved in long term development and in emergency issues in the district e.g. members of the DDC, LDCs. Arid Lands Resource Management Project under the office of the President, at local and national level, Ministry of Water Resources and Land reclamation, Ministry of Agriculture and Rural Development, Water User Associations, Women groups, Livestock User Associations and collaborating NGOs.
- e) Analyze the information generated through suitable analytical tools and methods.
- f) Present a draft report in an internal ITDG-EA workshop/seminar and eventually provide the final report two weeks after the workshop but not later than 20<sup>th</sup> of September 2001.

## **5. TIMETABLE FOR EVALUATION**

Tentatively, the evaluation exercise starts in August to September, 2001. The terms of reference will be used to draw up a contract between ITDG-EA and the monitoring team.

## Comments From ITDG on Project Evaluation

*Pg7: Findings, results and impacts.*

- a) Bullet no.2: In addition to the 11 boreholes and 7 water pans, activities in the water sector included capacity building of WUAs through management training, micro-business training, operations & maintenance training for water pump operators and formation of an umbrella water users association with 2 mobile gensets with weather proof canopies. A similar mobile set was provided to Soriadhi, an emergency borehole used at critical emergency periods. Also covered was tankering of water to facilitate construction of tanks, and excavation of water pans.
- b) Bullet No.5: Regarding comment that community capacity building in animal health is shallow. The evaluation omits the theoretical and practical lessons and the micro-enterprise management training that occurred in this objective over the course of the project.
- c) Prior to the inception of the project, ITDG-EA coordinated with COOPI on the interventions to be undertaken and each organization agreed to have different geographical coverage. COOPI was to cover the areas along the border to Ethiopia to reduce diseased animals entering Kenya. ITDG was to cover the interior. ITDG was fully aware of the dependency syndrome but one component of the project was intended to help the livestock population to pass through the emergency stage where the animals were emaciated and had no market value and the owners had no purchasing power to a stage where COOPI and other organizations could now be able to provide services at a cost. The emergency phase was one-time blanket coverage on animal health services. It is this service that made the animals survive the emergency phase.
- d) The observations made in this section do not address the insight and findings in respect to long-term development.

*Pg 8: Lessons learnt*

Buying drugs in Marsabit to support the existing drug supply lines would be a good idea but the strict rules specified by the grant in respect to procurement would be cumbersome to fulfill.

Page12; Section 2.1.1: Providing treatment and technical services

The figure of 822,000 quoted as the basis of the calculation of the coverage of the project is circumstantial. At the beginning of the project, the figure was about 400,000. Most animals had migrated to Ethiopia. Again, ITDG was not covering the whole district.

2.1.2: Replenishing the community drugstores

The key people managing the drug stores are trained. The managers are paravets who have undergone all the 4 phases of the training and also the micro-credit business.

Secondly, the financial standing of the drug store at Torbi seems to be based on reports rather than the cash flows and banking details.

Page 16; Table 2

1. Comments on the shallow wells seem somehow misplaced. The key issue here was access to cheap source of water for livestock and domestic use. Shallow wells represent the most sustainable source of water given its traditional place and management in pastoral set-ups.
2. There was no construction of tanks at Merille. The comment is inaccurate

Table 2 comments are not researched and informative.

#### Section 2.2.1

By August, all Gensets were in place. For the case of Dirip Gombo, UNICEF dumped the genset with the full knowledge of the consequences. This was negligence, pure and simple and had nothing to do with coordination; ITDG had coordinated with UNICEF and the later had even requested ITDG to take over their work. This occurred during the project review also attended by LWR.

#### Section 2.2.6

Two mobile gensets were provided to the umbrella WUAS not three. The third mobile set was for Soriadhi

Some of the observations in this section could have beefed up the summary at the beginning of the document.

#### Table 3. The logframe

Output. 1: The section on the households receiving advice. The indicator developed for monitoring was not efficient. Not all the buyers of the drugs were located within the project site and data on advice and usage became difficult to collect.

The delayed issuance of the paracetamol kits was caused by the initial need for more drugs as compared to the immediate need for paracetamol kits. The delay did not signify an oversight.

#### Section 4.5

Collaboration is a two-way street. There is a limit to which parties can be involved in an emergency situation especially if they happen to be reluctant. Using the Government departments makes coordination very explicit because they know all the actors and what they are doing at any given time. Unfortunately, some NGOs do not work hand in hand with the departments. This is the genesis of the collaborative bottlenecks.

#### Section 4.8

Unless USAID rules are redefined for emergency situations, purchases at project site may not meet the strict rules and regulations.

END