

## KNOWING WHAT WORKS

# Central project evaluation

Promotion of Competitiveness within the Framework  
of the Initiative for ASEAN Integration – COMPETE  
Project number 2017.2132.3

## Evaluation Report

On behalf of GIZ by Geert Engelsman (JaLogisch Consulting GmbH) and Thi Ngo Hoai (independent consultant)

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## Imprint

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## Abbreviations

ACAP	ASEAN Competition Action Plan
AEC	ASEAN Economic Community
AEGC	ASEAN Expert Group on Competition
AFAS	ASEAN Framework Agreement on Services
AMS	ASEAN member states
AMS-6	ASEAN member states Brunei, Indonesia, Malaysia, Philippines, Singapore and Thailand
ASEAN	Association of Southeast Asian Nations
ATISA	ASEAN Trade in Services Agreement
BMZ	German Federal Ministry for Economic Cooperation and Development
CCF	Ministry of Commerce – Consumer Protection, Competition and Fraud Repression Directorate-General, Competition Department, Cambodia
CCS	Coordinating Committee on Services, ASEAN
CLIP	Competition Law Implementation Project, funded by Australia and New Zealand
CLV	Cambodia, Laos and Viet Nam
CLMV	Cambodia, Laos, Myanmar and Viet Nam
DAC	Development Assistance Committee
DTG	Direct target group
EU	European Union
FFO	Federal Foreign Office, Germany
GDC	German development cooperation
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
ITG	Indirect target group
OECD	Organisation for Economic Co-operation and Development
OS	Other stakeholders
RCEP	Regional Comprehensive Economic Partnership
SDGs	Sustainable Development Goals
SMEs	Small and medium-sized enterprises
UNCTAD	United Nations Conference on Trade and Development
VCCA	Ministry of Industry and Trade – Viet Nam Competition and Consumer Authority



## The project at a glance

Southeast Asia (Cambodia, Laos, Viet Nam and Myanmar): Promotion of Competitiveness within the Framework of the Initiative for ASEAN Integration – COMPETE

Project number	2017.2132.3
Creditor reporting system code(s)	33130 – Regional trade agreements
Project objective	The successful implementation of the ASEAN Economic Community Blueprint 2025 in the areas of competition policy and trade in services.
Project term	1 September 2018 – 31 October 2022
Project value	EUR 3,997,188
Commissioning party/co-financier	German Federal Ministry for Economic Cooperation and Development (BMZ)
Lead executing agency	Association of Southeast Asian Nations (ASEAN). The ASEAN Secretariat represents the executing agency.
Implementing partner organisations (in the partner country)	-
Target group(s)	<p>Direct:</p> <ul style="list-style-type: none"> <li>• Cambodia: Ministry of Commerce (Consumer Protection, Competition and Fraud Repression Directorate-General and the General Department of International Trade) and the Cambodian Competition Commission.</li> <li>• Laos: Ministry of Industry and Commerce (Division of Competition, Multilateral Trade Division, Division of Trade in Services) and the Lao Competition Commission.</li> <li>• Myanmar: Ministry of Commerce (Department of Trade – Regional Economic Cooperation Division and the Competition Policy Division), Myanmar Competition Commission.</li> <li>• Viet Nam: Ministry of Industry and Trade (Viet Nam Competition and Consumer Authority) and Ministry of Planning and Investment (Services Sector Department).</li> </ul> <p>Indirect:</p> <ul style="list-style-type: none"> <li>• Producers and consumers in Cambodia, Laos, Myanmar and Viet Nam.</li> </ul>
Development cooperation (DC) programme	Formally, COMPETE is an 'individual measure' and not part of a development cooperation programme. In practice, GIZ has clustered COMPETE and three sister projects under the banner ASEAN Regional Economic Integration. All four projects support the implementation of the ASEAN Economic Community Blueprint 2025.
Implementing organisations of the DC programme	n/a
Organisation responsible for implementing and coordinating the DC programme	n/a
Reporting year of CPE	2023
Sample year of CPE	2019



# 1 Evaluation objectives and questions

This chapter describes the purpose of the evaluation, the standard evaluation criteria, and additional stakeholders' knowledge interests and evaluation questions.

## 1.1 Evaluation objectives

### Purpose

Central project evaluations of projects commissioned by the German Federal Ministry for Economic Cooperation and Development (BMZ) fulfil three basic functions: they support evidence-based decisions, promote transparency and accountability, and foster organisational learning within the scope of contributing to effective knowledge management. The Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH structures the planning, implementation and use of evaluations so that the contribution the evaluation process and the evaluation findings make to these basic functions is optimised (GIZ, 2018a).

### Intended users

The evaluation's primary intended users differ according to the functions of the evaluation. In terms of accountability, the primary intended user is GIZ's Corporate Unit Evaluation, which prepares, annually, a synthesis report on all central project evaluations, thereby offering a comprehensive account to BMZ of the development effectiveness of BMZ's technical assistance portfolio. In terms of learning and decision-making, the primary intended users are:

- BMZ Division 311 East Asia & Southeast Asia,
- GIZ Economic and Social Development, Employment Division, and
- the COMPETE project team, which is also implementing the follow-on project (COMPETE II).

The secondary intended users of the evaluation are:

- COMPETE's sister GIZ projects working with ASEAN,
- the ASEAN Secretariat,
- the Competition Law Implementation Project (CLIP), funded by Australia and New Zealand, and
- the competent ministries and competition authorities in Cambodia, Laos and Viet Nam.

### Limitations

The evaluation rests on a clearly defined project and a well-articulated theory of change (see section 2.2). Its main limitations were the amount of time the evaluation team had on the ground in Cambodia, Laos and Viet Nam – roughly three working days in each country – and not being able to travel to Myanmar, as the German federal government halted all development cooperation with Myanmar after the country's military coup in 2021 (GIZ, 2021b). The fact that the field visits to Cambodia, Laos and Viet Nam lasted only three days meant the number and breadth of key informants that could be interviewed were restricted. Not travelling to Myanmar and not being able/allowed to communicate with government representatives there meant that the evaluation could not verify or assess the project's progress in Myanmar<sup>1</sup>. These limitations were counterbalanced by the fact that the evaluation team gained first-hand insight into the developments on competition policy and trade in services in three countries. This allowed for a triangulation of findings across the countries. Moreover, the

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<sup>1</sup> As a result, the evaluation's findings, conclusions and recommendations are based on the data collected from Cambodia, Laos and Viet Nam. Where this report refers to the 'CLMV countries' (Cambodia, Laos, Myanmar and Viet Nam), this only applies to Myanmar up to the point at which Germany ceased its development cooperation operations in Myanmar.

evaluation team was still able to collect views and experiences from a diversity of stakeholders. Despite these limitations, therefore, the evaluation report offers a fair and balanced perspective on the COMPETE project.

## 1.2 Evaluation questions

The project is assessed on the basis of standardised evaluation criteria and questions to ensure comparability by GIZ. This is based on the Organisation for Economic Co-operation and Development ([OECD](https://www.oecd.org/dac/evaluation-criteria/))/Development Assistance Committee (DAC) [evaluation criteria](https://www.oecd.org/dac/evaluation-criteria/) (updated 2020) for international cooperation and the <https://www.bmz.de/de/aktuelles/publikationen/92894-92894>: **relevance, coherence, efficiency, effectiveness, impact and sustainability.**

Specific assessment dimensions and analytical questions have been derived from this framework. These form the basis for all central project evaluations in GIZ and can be found in the **evaluation matrix** (annex). In addition, contributions to the 2030 Agenda for Sustainable Development and its principles are taken into account, as are cross-cutting issues such as gender, the environment, conflict sensitivity and human rights. Also, aspects regarding the quality of implementation are included in all OECD/DAC criteria.

In addition, the primary intended users of the evaluation expressed their own knowledge interests in the evaluation – see Table 1.

Table 1: Knowledge interests by main evaluation stakeholder groups

Evaluation stakeholder group	Knowledge interests in evaluation/additional evaluation questions	Relevant section in this report
Project team	The aim of promoting competition – through the promulgation and implementation of a competition law – is to protect and benefit consumers. It is to ensure that consumers have a choice of products and services and are charged fair prices. Measuring these benefits (impacts) is difficult, because it goes beyond individual products and services, the counterfactual situation is seldomly precisely known, and the benefits are only apparent at a significantly later date. <b>How then to measure impact? What intermediary milestones indicate (likely) success? And how can (the benefit of) increased capacity of competition authorities be measured?</b>	Section 4.4 – Effectiveness (on measuring the benefits and increased capacity of competition authorities); Section 4.5 – Impact (on measuring impact).
GIZ sectoral department	GIZ is interested in macroeconomic policy support as a key ingredient for the structural transformation and sustainable development of developing countries' economies. The ever-increasing digitalisation of economies and the network effects it fosters also pose challenges to this effect, e.g. how to deal with emerging oligo- or monopolies. Moreover, the GIZ sectoral department is updating its knowledge management content. For these reasons, <b>the sectoral department is interested in collecting further experiences of and lessons regarding what works, what doesn't and why in promoting competition policy and trade in services.</b>	Chapter 5 – Conclusions and recommendations.

Evaluation stakeholder group	Knowledge interests in evaluation/additional evaluation questions	Relevant section in this report
BMZ	Under the Initiative for ASEAN Integration (IAI), COMPETE was an 'accredited' development project. <b>What difference did the accreditation make? And, more importantly, what contribution did COMPETE make to the objectives of the IAI of closing the development gap between the CLMV countries and the other ASEAN member states?</b>	Section 4.3 – Coherence (use of regional systems); Section 4.5. – Impact.

## 2 Object of the evaluation

This chapter defines the evaluation object, including the theory of change and results hypotheses.

### 2.1 Definition of the evaluation object

#### The institutional and policy anchors of the COMPETE project

After the 1997 Asian financial crisis, ASEAN member states (AMS) set the stage for closer regional economic integration.

- In 2000, the Initiative for ASEAN Integration sought to close the development gap between, on the one hand, Brunei, Indonesia, Malaysia, Philippines, Singapore and Thailand (generally referred to as the AMS-6) and, on the other, Cambodia, Laos, Myanmar and Viet Nam (the CLMV countries) (ASEAN, 2020b)
- In 2003, ASEAN announced the establishment of an ASEAN Political & Security Community, an ASEAN Economic Community and an ASEAN Social-Cultural Community. The ASEAN Economic Community was to create 'a single market' (ASEAN, 2003).
- In 2008, ASEAN adopted a new Charter offering a binding 'legal and institutional framework for ASEAN'. The Charter 'committed to intensifying community building through enhanced regional cooperation and integration ... [and] to create a single market' (ASEAN, 2008a). ASEAN subsequently adopted, among other things, the ASEAN Economic Community (AEC) Blueprint, which laid down 'the characteristics and elements of the ASEAN Economic Community ... which each ASEAN Member Country shall abide by and implement by 2015' (ASEAN, 2008b).
- In 2015, ASEAN approved an AEC Blueprint update – extending its reach to 2025. The update no longer refers to the creation of a single market. Still, the overall goal of the AEC is 'creating a networked, competitive, innovative, and highly integrated and contestable ASEAN'. Two of the objectives included in the Blueprint are 'to facilitate the seamless movement of goods, services, investment, capital and skilled labour within ASEAN' and 'engendering a level playing field for all firms through effective competition policy' (ASEAN, 2015). ASEAN translated the Blueprint's commitments on competition policy into the ASEAN Competition Action Plan (ACAP) 2016–2025 (ASEAN, 2020a).

The Initiative for ASEAN Integration – to which COMPETE is accredited – forms the institutional anchor, and the AEC Blueprint 2025 and ACAP form the policy anchor for the COMPETE project within ASEAN (GIZ, 2018c).

## Problem identification and analysis

GIZ observed within ASEAN an ‘implementation gap’ between the AMS-6 and the CLMV countries in fulfilling the AEC Blueprint 2025 and ACAP commitments (GIZ, 2018c). The main reasons for this implementation gap were perceived to be a lack of knowledge, skills, strategies and action plans, inhibiting the responsible authorities in the CLMV countries from steering, coordinating and monitoring the implementation of, and effectively engaging in inter-ministerial coordination and public-private dialogue on, the AEC Blueprint 2025 and ACAP (GIZ, 2018c).

## Objective and workstreams

Having identified this problem, COMPETE set out to help the CLMV countries successfully implement the AEC Blueprint 2025, specifically in the field of competition policy (i.e. the ACAP) and trade in services (GIZ, 2018c)<sup>2</sup>. The project sought to contribute in four ways to this outcome objective, namely by supporting:

- the participation and leadership of the CLMV countries at ASEAN level in putting the AEC Blueprint 2025 and the ACAP into operation,
- the development of the institutional framework in the CLMV countries to implement the AEC Blueprint 2025 and the ACAP,
- the formulation and implementation of new formats for inter-ministerial coordination and public-private dialogue on competition policy and trade in services in the CLMV countries, and
- the development of the requisite managerial and staff competencies in the responsible government ministries and agencies of the CLMV countries.

## Instruments

As its means to support this objective and workstreams, the project had at its disposal:

- a small GIZ team consisting of a team leader (in Vientiane, Laos), a part-time international expert (in Phnom Penh, Cambodia), four full-time national, long-term experts (one in each of the CLMV countries), and a part-time national consultant – a competition policy expert – in Viet Nam,
- a budget for external short- and medium-term experts to support the project’s partners in the CLMV countries and two ASEAN sectoral bodies: the ASEAN Expert Group on Competition (AEGC) and the ASEAN Coordinating Commission on Services (CCS), and
- a budget to facilitate the organisation of events/conferences and the participation of CLMV representatives therein, i.e. to cover venue, catering, moderation, transport and travel costs.

## Target groups

COMPETE’s direct target groups were the competent authorities in the CLMV countries on competition policy and trade in services – see

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<sup>2</sup> The project originally also envisaged supporting the implementation of the Strategic Action Plan for Services, but this was ultimately never developed by ASEAN (Int GDC\_16).

Table 2. At ASEAN level, COMPETE also worked with the AEGC, CCS and ASEAN Secretariat. This work was to facilitate the operationalisation of the AEC Blueprint 2025 and the ACAP for the benefit of their direct target groups in the CLMV countries. As such, the AEGC, CCS and the ASEAN Secretariat were not direct target groups, but rather project partners. COMPETE's indirect target group comprised the producers and consumers in the CLMV countries who – in the long run – will benefit from increased competition and trade in services in those countries.

Table 2: The direct target groups

	Competition policy	Trade in services
<b>Cambodia</b>	<ul style="list-style-type: none"> <li>Ministry of Commerce – Consumer Protection, Competition and Fraud Repression Directorate-General, Competition Department (CCF)</li> <li>Cambodian Competition Commission (CCC)</li> </ul>	<ul style="list-style-type: none"> <li>Ministry of Commerce – General Department of International Trade</li> </ul>
<b>Laos</b>	<ul style="list-style-type: none"> <li>Ministry of Industry and Commerce – Division of Competition, Multilateral Trade Division</li> <li>Lao Competition Commission (LCC)</li> </ul>	<ul style="list-style-type: none"> <li>Ministry of Industry and Commerce – Division of Trade in Services</li> </ul>
<b>Myanmar</b>	<ul style="list-style-type: none"> <li>Ministry of Commerce – Department of Trade, Competition Policy Division</li> <li>Myanmar Competition Commission</li> </ul>	<ul style="list-style-type: none"> <li>Ministry of Commerce – Department of Trade, Regional Economic Cooperation Division</li> </ul>
<b>Viet Nam</b>	<ul style="list-style-type: none"> <li>Ministry of Industry and Trade – Viet Nam Competition and Consumer Authority (VCCA)</li> </ul>	<ul style="list-style-type: none"> <li>Ministry of Planning and Investment – Services Sector Department</li> </ul>

## Budget and duration

The COMPETE project spent close to its full budget of EUR 4,000,000 (GIZ, 2022g). The project was originally envisaged to run for three years, from 1 September 2018 until 31 August 2021 (GIZ, 2018c). The project duration was extended twice – on a cost-neutral basis – by a total of one year and two months. The project closed on 31 October 2022 with a final project duration of four years and two months. The reason for the extensions was that the project had significantly underspent its budget, owing to:

- an eight-month delay in the project start because of the late project approval in the CLMV countries,
- the COVID-19 pandemic, which delayed or prevented project activities, and
- the cessation of all project activities in Myanmar from February 2021 onwards (GIZ, 2021a; 2022a).

## 2.2 Results model, including hypotheses

In this section, COMPETE's theory of change is described by means of four results hypotheses<sup>3</sup>. The project's planned impacts are subsequently placed within the 2030 Agenda for Sustainable Development. The section concludes with a definition of COMPETE's sphere of influence, or so-called system boundary.

### Results hypotheses

COMPETE's results hypotheses, which run from activities to outcomes, are presented in two steps. First, from activities to outputs, differentiating between the project's four workstreams, and second, from outputs to outcomes. The latter is presented in consolidated form, as, for this step in the results hypotheses, the underlying assumptions are largely the same for each workstream. Each results hypothesis is indicated by the letter R and a number (R#) in the graphical representation of the results model (Figure 1). For readability purposes, the project's direct target groups are collectively referred to as partner organisations in the results and impact hypotheses.

### From activities to outputs

#### Results hypothesis 1 (R1)

**IF** the project advises the partner organisations – through the project team, as well as by organising and funding external consultancy services – and co-funds the partner organisations' participation in ASEAN meetings (**activities**),

<sup>3</sup> The results and impact hypotheses have been deduced from the BMZ proposal, the project results matrix and conversations with the project team during the inception mission.

**THEN** the partner organisations will lead and conclude the operational planning of selected key action lines from the AEC Blueprint and the ACAP in the AEGC and CCS (**output**),

**BECAUSE** the partner organisations have the:

- interest, knowledge, capacity, incentive, political support, negotiating prowess, willingness and tenacity to act on the key action lines of the AEC Blueprint 2025 and the ACAP, and lead the operational planning of their implementation in the AEGC and CCS, and
- the project offered the requisite guidance and funding for the partner organisations to lead the operational planning of selected key action lines from the AEC Blueprint 2025 and the ACAP (**assumptions**).

### **Results hypothesis 2 (R2)**

**IF** the project advises partner organisations – through the project team as well as by organising and funding external consultancy services – and organises and funds study tours on the requisite domestic policy and institutional frameworks needed for implementing the AEC Blueprint 2025 and the the ACAP (**activities**),

**THEN** the partner organisations will set up the requisite policy and institutional frameworks, and better conditions will exist in the CLMV countries to implement the related AEC Blueprint 2025, the ACAP, and national competition laws and trade in services commitments (**output**),

**BECAUSE:**

- the partner organisations have the interest, knowledge, capacity, incentive, political support, negotiating prowess, willingness and tenacity to act on the key lines of action and set up the requisite policy and institutional frameworks,
- the project offers the requisite guidance to create and set up the requisite policy and institutional frameworks, and
- the project offers practical support, focusing on actions nascent competition authorities face (**assumptions**).

### **Results hypothesis 3 (R3)**

**IF** the project advises partner organisations – through the project team, as well as by organising and funding external consultancy services – and funds the organisation of inter-ministerial coordination meetings and public-private dialogue (**activities**),

**THEN** the partner organisations will develop and implement new formats for inter-ministerial coordination and public-private dialogue (**output**),

**BECAUSE:**

- the partner organisations have the interest, knowledge, capacity, incentive, political support, negotiating prowess, willingness, and tenacity to develop and implement new formats for inter-ministerial coordination and public-private dialogue, and
- the project offers the requisite guidance to develop and implement new formats for inter-ministerial coordination and public-private dialogue (**assumptions**).

### **Results hypothesis 4 (R4)**

**IF** the project advises partner organisations – through the project team, as well as by organising and funding external consultancy services – and funds IT hardware and online learning platforms (**activities**),

**THEN** the partner organisations will develop and implement new, gender-equitable, staff development systems on competition policy and trade in services (**output**),

**BECAUSE:**

- the partner organisations have the interest, knowledge, capacity, incentive, political support, authority, autonomy, willingness and tenacity to develop and implement new, gender-equitable, staff development systems on competition policy and trade in services, and
- the project offers the requisite guidance to develop and implement new, gender-equitable, staff development systems on competition policy and trade in services (**assumptions**).

## From outputs to outcome

**IF** the partner organisations:

- lead and conclude the operational planning of selected key action lines from the AEC Blueprint and the ACAP in the ASEAN Expert Group on Competition and ASEAN Coordinating Committee on Services (output 1),
- set up the requisite policy and institutional frameworks to implement the AEC Blueprint 2025 and the ACAP (output 2),
- develop and implement new formats for inter-ministerial coordination and public-private dialogue (output 3), and
- develop and implement new, gender-equitable, staff development systems on competition policy and trade in services (output 4),

**THEN** the CLMV countries will implement the key action lines of the AEC Blueprint 2025 and the ACAP in their country (outcome),

**BECAUSE:**

- it is economically and politically imperative for the CLMV countries to act on, gain from and not lose out on ASEAN's economic integration, and the implementation of the key action lines is critical to bringing about ASEAN's economic integration,
- the partner organisations have the interest, knowledge, capacity, incentive, political support, authority, autonomy, negotiating prowess, willingness and tenacity to act on and drive through the implementation of the key action lines,
- there are no 'veto players' in the CLMV countries that can scupper the implementation of the key action lines from the AEC Blueprint 2025 and the ACAP,
- CLMV's active participation in the AEGC, CCS and other ASEAN conferences (including those organised in the CLMV countries) – and the exposure, knowledge and perspectives gained from these meetings and conferences – will foster public and political support for ASEAN economic integration,
- While ASEAN has no stick with which to enforce either the Charter or the AEC Blueprint 2025, guidelines developed at ASEAN level and experiences from other ASEAN countries are used by CLMV countries to shape their policies and approaches,
- inter-ministerial coordination fosters inter-ministerial consensus on the implementation of the AEC Blueprint 2025 and the ACAP, and
- an informed private sector supports, advocates for and contributes to the implementation of the AEC Blueprint 2025 and the ACAP (assumptions).

The four results hypotheses are interlinked. They are – collectively – to bring about the envisaged outcome. Together, they seek to inspire, foster engagement, stimulate strategic thinking, build the requisite managerial and staff capacity, set up supporting institutional policies and systems, and promote alliances within government and with the private sector. A further assumption is, therefore, that each of these strings, workstreams or results hypotheses 'cross-fertilises' the others, such that, collectively, they will lead the CLMV countries to implement the AEC Blueprint 2025 and ACAP provisions, implement their competition policies and promote the liberalisation of trade in services.

## Impact hypotheses

As an 'individual measure', the project did not have to define an impact objective, nor identify impact indicators. The envisaged impacts could nonetheless be gleaned from the BMZ Offer. Annex 2 Logical framework stated the medium-term goal as 'increased trade in services and investments' (GIZ, 2018c). This pertains first and foremost to the project's work on trade in services. The implementation of competition laws in the CLMV countries should, instead, result in 'cheaper and qualitatively better products and services for consumers' (GIZ, 2018c). This translates into the following two impact hypotheses.



### Impact hypothesis 1 (I1)

**IF** the CLMV countries implement the AEC Blueprint and the ACAP (outcome),

**THEN** consumers will gain access to cheaper and better-quality products and services (impact),

**BECAUSE:**

- there is functioning and effective competition policy oversight by the national competition authorities, and
- more competition exists in the CLMV markets (assumptions).

### Impact hypothesis 2 (I2)

**IF** the CLMV countries implement the AEC Blueprint and the ACAP (outcome),

**THEN** trade and investment in services will increase between the CLMV countries and the ASEAN countries (impact)

**BECAUSE:**

- (non-tariff) trade barriers have been removed,
- service standards and regulations have been harmonised between countries,
- CLMV countries offer an interesting market for each other and for other ASEAN countries, and
- CLMV businesses, including small and medium-sized enterprises (SMEs), possess a comparative or competitive advantage vis-à-vis the ASEAN countries and are ready and able to invest in and trade with other countries (assumptions).

## 2030 Agenda for Sustainable Development

COMPETE was principally focused on institution-building, economic development and regional economic integration. As such, the project claimed to contribute to Sustainable Development Goals 8.1 (economic growth), 8.3 (entrepreneurship and employment), 16.3 (rule of law) and 16.8 (global governance) (GIZ, 2018c).

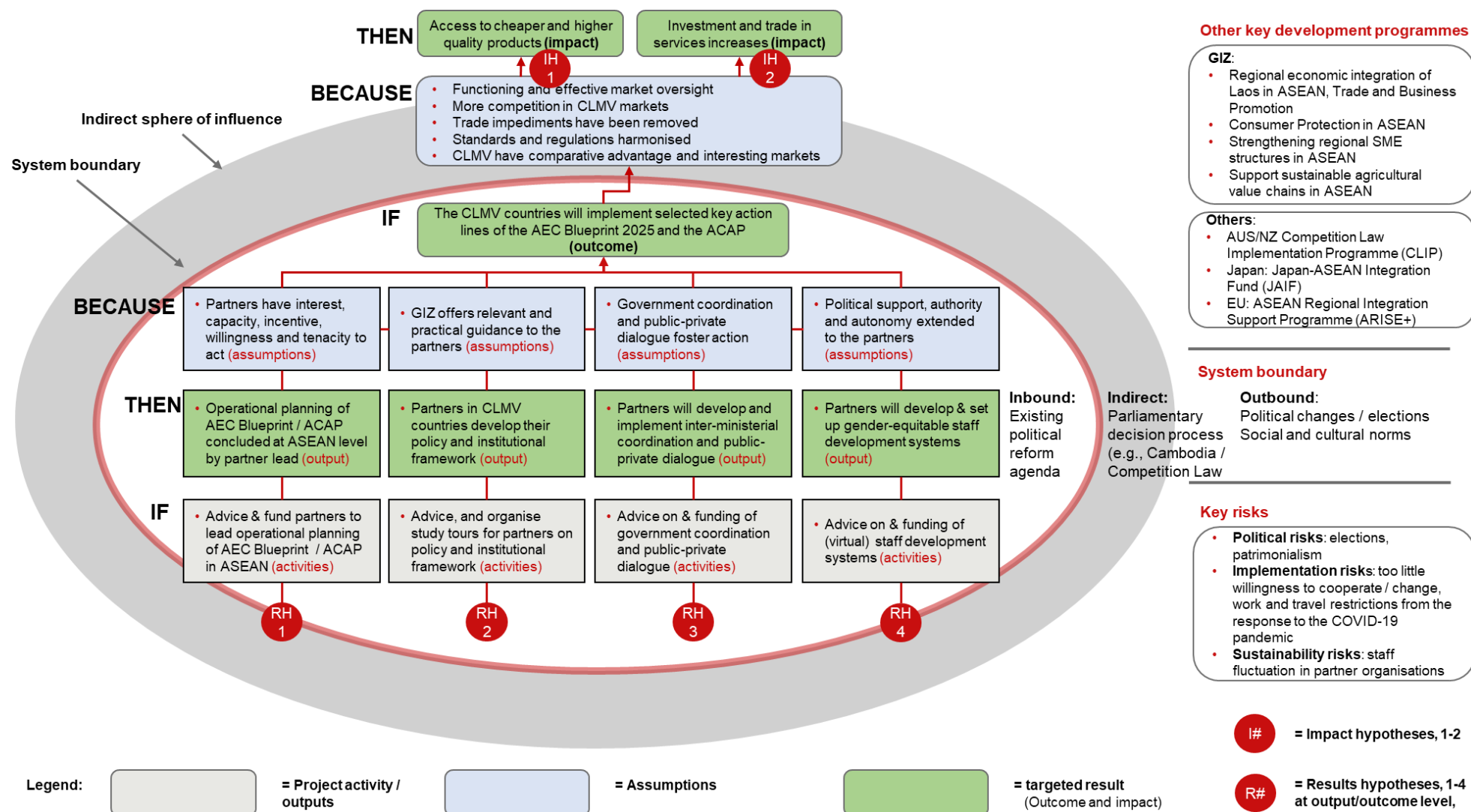
### System boundary

The BMZ Offer did not explicitly define the project's system boundary. From the description of risks, it can be inferred that GIZ considered a change in government, the buy-in of the competent authorities and staff turnover in its partner organisations to lie outside the project's sphere of influence. Of course, a change in government – through elections or a coup – is something GIZ cannot influence. Having said that, competition policy and trade are highly political topics and country ownership is a prerequisite for effective development cooperation. The buy-in of the competent authorities can hardly be placed or deemed to lie outside the system.

On the one hand, the project recognised this. It facilitated parliamentary decision-making in Cambodia on the adoption of a competition law by preparing a 'commentary' and 'Q&A' on the draft law (GIZ, 2022c). Moreover, it intended to facilitate inter-ministerial coordination and public-private dialogue. On the other hand, the BMZ Offer did not reveal the extent of an upfront qualified demand for support from within the CLMV countries: who propagated a competition practice and free trade in services? To what extent did these persons or institutions formulate and initiate a domestic reform agenda? What authority, autonomy and resources were invested in these persons or institutions? What support did these persons and institutions require and request from development partners?

The assumption appeared to have been that because the CLMV countries had signed up to the ASEAN Charter and AEC Blueprint 2025, these countries were committed to the implementation of the latter. But why would limited buy-in from the competent authorities then be posited as a risk to the project? These observations on politics, ownership and the system boundary presented something of a conundrum with which the evaluation team actively grappled during the field mission and to which we will return in section 0 on relevance. For now, it is safe to say that the system boundary cannot be sharply circumscribed: there is a grey area. This is shown in Figure 1, which offers a graphical representation of the project, its theory of change, its system boundary and the project's relation to other GIZ and development partner projects

Figure 1: Current results model (December 2022), adapted during the evaluation



## 3 Evaluability and evaluation process

This chapter clarifies the availability and quality of data and the evaluation process.

### 3.1 Evaluability: data availability and quality

This section covers the following aspects:

- availability of essential documents,
- monitoring and baseline data, including partner data, and
- secondary data.

#### Availability of essential documents

All relevant project documents and information were available to the evaluation team – see Inception Report (Engelsman & Thi Ngo, 2022)

#### Monitoring and baseline data, including partner data

COMPETE set out to help the CLMV countries implement the key action lines of the AEC Blueprint 2025 and the ACAP. These action lines – called ‘outcomes’ since the post mid-term review of the AEC Blueprint – concern the adoption, setting up, formulation or development of laws, decrees, regulations, institutions, manuals, studies, platforms and capacity (ASEAN, 2015; 2020a). As the project put it, to ascertain success and report on results, it simply needed to observe whether these key action lines had been implemented during the project and ‘count’ the outcomes achieved<sup>4</sup>. This did not require a sophisticated results monitoring system or tool. The project captured the baseline in the original results matrix, the observed ‘outcomes’ in an Excel sheet, and the overall results in the annually updated results matrix. This constituted COMPETE’s results monitoring system.

The baseline for all three of the project’s outcome indicators was set to zero. On the one hand, this is strange, as it suggests that the competent authorities in the CLMV countries started from scratch and had not done anything on competition policy and trade in services prior to the COMPETE project (which clearly is not the case, as all four countries adopted a competition law and participated in ASEAN negotiations on an ASEAN Trade in Services Agreement prior to the project). On the other hand, the outcome indicators were defined such that they indicated the CLMV countries’ actions and achievements ‘during the duration of the project’. In other words, they refer to actions and achievements ‘in addition’ to all that transpired beforehand.

Over and above the results monitoring and reporting, COMPETE monitored the project implementation ‘process’, in particular the extent to which the competent authorities on competition policy and trade in services in the CLMV countries formulated their own reform agendas, requested support from GIZ and responded to COMPETE’s support. This process monitoring was done ‘implicitly’ and ‘informally’ by the project team. It was not ‘written down’ in any document.

In 2020, the ASEAN Secretariat commissioned a mid-term review of the AEC Blueprint 2025. The evaluation team made use of this mid-term review. Moreover, the ASEAN Secretariat monitored the implementation of the key action lines from the ACAP. The Secretariat shared its assessment of implementation progress, including the number of key action lines to whose implementation COMPETE contributed. In addition, the evaluation

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<sup>4</sup> ‘Outcomes’ is, in this case and in evaluation-speak, somewhat of a misnomer. The adoption, setting up, formulation or development of laws, decrees, regulations, institutions, manuals, studies, platforms and capacity rather resemble ‘outputs’. It is only when these are put into effect that outcomes can emerge.

made use of the annual reports published by the Viet Nam Competition and Consumer Authority (the only authority in the CLMV countries with publicly available annual reports).

### Secondary data

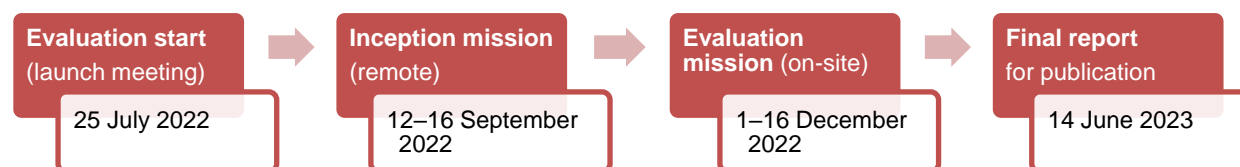
The evaluation team collected statistical time-series data on key macroeconomic variables for the ASEAN member countries (including volume and growth of GDP and exports and imports of services). These data series stem from the World Bank DataBank.

## 3.2 Evaluation process

This section covers the following aspects:

- milestones of the evaluation process,
- involvement of stakeholders and selection of interviewees,
- data analysis process, and
- roles of international and local evaluators.

Figure 2: Milestones of the evaluation process



### Involvement of stakeholders and selection of interviewees

The direct target group of COMPETE comprised the competent ministries on competition policy and trade, as well as the national competition commissions. The evaluation interviewed the relevant ministerial departments on competition policy in Cambodia, Laos and Viet Nam during the inception phase to enquire after their interest in the evaluation, the conflict sensitivity of the evaluation, and their monitoring data on competition policy and trade in services. Representatives of the departments of trade were not available for a virtual exchange during the inception phase.

In Cambodia, Laos and Viet Nam, the evaluation subsequently interviewed, during the evaluation mission, the senior management<sup>5</sup> and staff of the relevant ministerial departments on competition policy and trade (*full sampling*), as well as the independent members of the national competition commissions in Cambodia and Laos<sup>6</sup> (*purposeful selection based on professional background and independence from government to obtain an additional perspective on the implementation of the competition law in the respective countries*).

As representatives of the final beneficiaries and as stakeholders in the practice of competition policy and trade in services, representatives from business and consumer associations in Cambodia, Laos and Viet Nam were also interviewed. The business and consumer associations were selected together with the project team based on their position in the public debate and engagement with competition policy and free trade (*purposeful selection based on importance and interest*).

The third group of key informants to the evaluation comprised people who could offer context, specific information, and/or a more arm's-length perspective on COMPETE and the fields of competition policy and

<sup>5</sup> This included the representatives (or their deputies) of Cambodia, Laos and Viet Nam to the AEGC.

<sup>6</sup> At the time of writing, Viet Nam had not established its envisaged National Competition Commission.

trade in services. These concerned independent (academic) experts, external thematic experts used by COMPETE, development partners and BMZ representatives. These key informants were *purposefully selected* based on their expertise, availability and/or their engagement with COMPETE.

Finally, the evaluation team discussed the project design, results and challenges in depth with the project team during both the inception and evaluation missions. Moreover, the evaluation team conducted a debriefing of the project team at the end of the field mission and another in-depth exchange with it on the evaluation's findings, conclusions and recommendations based on the draft evaluation report.

Table 3: List of evaluation stakeholders and selected participants

Organisation/company/ target group	Overall number of persons involved in evaluation (disaggregated by gender)	No. of interview participants	No. of focus group participants	No. of workshop participants	No. of survey participants
<b>Donors</b>	4 (2)	4 (2)			
BMZ					
<b>GIZ</b>	24 (14)	19 (11)	10 (5)		
GIZ project team, other GIZ projects, GIZ headquarters Germany					
<b>Direct target group (DTG) – Partner organisations</b>	29 (8)	29 (8)			
Relevant ministries (commerce/trade), competition authorities/commissions, country representatives					
<b>Indirect target group (ITG)</b>	7 (2)	7 (2)			
Business and consumer associations as representatives of final beneficiaries (companies and consumers).					
<b>Development partners</b>	3 (2)	3 (2)			
Australian Competition Commission, World Bank, International Trade Centre					
<b>Other stakeholders (OS)</b>	19 (11)	19 (11)			
ASEAN Secretariat, academia, external experts (national, ASEAN, international)					
<b>Total</b>	86 (39)	81 (36)	10 (5)		

## Data analysis process

This evaluation constitutes **a qualitative enquiry** into the development effectiveness of COMPETE. The choice of qualitative enquiry was informed by the qualitative nature of the project's objective (see section 2.1), the multi-dimensionality of the project design (see section 2.1), and the ex-post nature of the evaluation (see chapter 1), which precluded any other (more experimental) evaluation design. The qualitative enquiry consisted of, in terms of data collection methods, limited quantitative data collection, a document review, key informant interviews and a limited number of focus group discussions. In this section, the purpose, scope and (dis-) advantages of these data collection methods are detailed and the subsequent data analysis methods of the evaluation are explained.

The purpose of the **quantitative data collection** was to assess the competition policy practice, as well as the evolution of regional integration and trade in services in Cambodia, Laos and Viet Nam. The evaluation used

national data points as shared with the evaluation team during interviews and verified in documentation, as well as data from the ASEAN Secretariat and the World Bank's DataBank. The advantage of quantitative data is the ease with which they convey developments. With relatively good data available, this was especially true for trade in services (see section 4.5). Data on the CLMV countries' competition were, however, scarce and lacked common reporting standards. Still, the numbers offered some insight into how active the CLMV countries are in enforcing their competition laws (see sections 4.2 and 4.4).

The purposes of the **document review** were to (i) understand the intent, scope, evolution, theory of change and (evolving) context of the project, and (ii) collect data, stories and context on the project outcomes. The review encompassed project, ASEAN and government documents, as well as third-party sector analyses. The document review's advantage is that it allowed the evaluation team to map the project's intentions, results and context at different points in time. Its disadvantage is that it offered limited insight into 'why' the intentions, results and context were as they were. This is because most documents are descriptive rather than analytical in nature. To gain in-depth insights into the project's intentions, results and context, the evaluation team relied on interviews.

The purpose of the **key informant interviews** was to collect qualitative data for answering the evaluation questions. The scope and selection of key informants were covered in the previous section. The advantage of the key informant interviews is that it allowed the evaluation team to engage in-depth with the direct and (representatives from the) indirect target groups on why and how they responded to the project support, changes in the project context and/or project results. This produced first-hand accounts of the (reasons for the) project's value and effectiveness. The disadvantage of key informant interviews is that they are time-consuming. The evaluation's resources only allowed for a limited number of interviews and the common practice was to restrict interviews to one hour (or, at most, an hour and a half). This made it important to carefully select the key informants such that, over the course of multiple interviews, the evaluation was able to secure a realistic picture of the project (see previous sub-section).

The purpose of the **focus group discussions** was to collect specific qualitative data for answering the evaluation questions. The specific enquiries concerned the practice and political economy of competition policy in Cambodia, Laos and Viet Nam, and the internal coherence of COMPETE with the family of ASEAN projects implemented by GIZ. Focus group discussions were held with members of the national competition authorities and GIZ staff working on COMPETE's sister projects. The advantages and disadvantages of focus group discussions are like those of key informant interviews. In addition, their advantage of having multiple stakeholders in the room at the same time is also a disadvantage, as the speaking time of each participant is automatically less than in a one-on-one interview. The trick was, therefore, to enable the different participants to feed off each other and thus facilitate an in-depth dialogue.

The evaluation applied a variety of **data analysis methods** for answering the evaluation questions. First, the evaluators interacted with the collected data with an open mind, identifying emerging themes and patterns. This 'inductive analysis' took place during the collection exercise, when the evaluators tried to make sense of the data collected. It entailed immediate reflection by the evaluators after individual (sets of) meetings, both individually and – importantly – collectively.

After the field mission, all the collected data were scrutinised for their potential answers to the evaluation questions. This 'deductive analysis' constituted a structured analysis of the data collected based on the evaluation questions and assessment criteria. As part of the deductive analysis, the evaluation conducted a 'contribution analysis' (Mayne, (2008). Contribution analysis entails a structured evaluation to assess whether the project likely contributed to the observed outcomes or whether other explanatory factors were responsible for these outcomes.

As part of both the inductive and deductive analyses and for answering the evaluation questions on efficiency, the evaluation conducted an 'efficiency analysis'. Based on the follow-the-money approach and the outcomes of the GIZ Central Project Evaluation Unit's efficiency tool, the evaluation answered the following two main efficiency questions: could the same results have been achieved with fewer resources or could better results have been achieved through a different allocation of resources?

Throughout the data analysis and while answering the evaluation questions, the evaluation applied the principle of 'triangulation'. Specifically, the evaluation triangulated its findings and conclusions across data sources and evaluators. Triangulation across data sources means that findings and conclusions rest on data that stem from different categories of key informants and/or documents. Triangulation across evaluators means that both evaluators needed to reach the same findings and conclusions based on the collected data.

Finally, the evaluation subjected the draft evaluation report – including all findings, conclusions and recommendations – to a 'critical review' by the Central Project Evaluation Unit and the project team. The purpose of this review was to determine whether the evaluation report was factually correct and to test whether the evaluation's findings, conclusions and recommendations were sound and useful.

### **Roles within the evaluation team**

The evaluation was conducted by a two-person team: an international team leader and principal evaluation specialist, and a regional private sector development and evaluation specialist. The detailed division of labour was spelled out in the inception report (Engelsman & Thi Ngo, 2022). While the team leader led on the evaluation process and methodology, the regional evaluator ensured the contextualisation of the evaluation. The two team members conducted the field mission and all interviews together. They collaborated closely on the evaluation's findings, conclusions and recommendations during and after the field mission. This evaluation report represents the outcome of these exchanges.



## 4 Assessment according to OECD/DAC criteria

The following sections set out how the project was evaluated against the OECD/DAC criteria.

### 4.1 Impact and sustainability of predecessor projects

Formally, COMPETE did not have a predecessor project. It constituted a new, standalone project. Therefore, in principle, this evaluation did not have to concern itself with the impact and sustainability of any predecessor project. In practice, COMPETE built on and consolidated two previous projects:

- Competition Policy in ASEAN (PN 2013.2072.2) and
- Support to the Initiative for ASEAN Integration on Regional Integration (PN 2012.2077.1).

These two projects had wider mandates. Besides competition policy and trade in services, they covered consumer protection and free movement of qualified labour. The Competition Policy in ASEAN project also covered, with its country-level activities, all BMZ partner countries within ASEAN, rather than just the CLMV countries. Furthermore, the two projects had, cumulatively, a bigger budget: EUR 10 million versus EUR 4 million for COMPETE.

On competition policy and trade in services, the underlying premise of the two projects was the same as for the COMPETE project. They assisted the ASEAN member states, in particular the CLMV countries, in following up on and implementing the AEC Blueprint. Like COMPETE, the projects sought to promote a functioning and effective competition practice and remove barriers to free trade in services (GIZ, 2014; 2018d; 2018e).

In practice, COMPETE and its predecessors constitute a continuum of support. In the subsequent sections, the slow progress on competition policy is discussed. The impact and sustainability of Germany's support rest on a precarious basis. On trade in services, liberalisation has been driven by free-trade agreements rather than Germany's development cooperation.

The relevant point for this section is, however, that the contributions made by the projects cannot meaningfully be separated from each other. The subsequent evaluation and assessment of COMPETE therefore also applies to these two predecessor projects with respect to competition policy and trade in services.



Photo 1: Asia region, ASEAN member states and the ASEAN motto



Source: Geographic map from mapchart.net; ASEAN motto: the ASEAN Secretariat

## 4.2 Relevance

This section analyses and assesses the relevance of COMPETE. It is structured according to the assessment dimensions in the GLZ project evaluation matrix (see annex).

### Summarising assessment and rating of relevance

Table 4: Rating of OECD/DAC criterion: relevance

Criterion	Assessment dimension	Score and rating
Relevance	Alignment with policies and priorities	15 out of 30 points
	Alignment with the needs and capacities of the beneficiaries and stakeholders	20 out of 30 points
	Appropriateness of the design*	10 out of 20 points
	Adaptability – response to change	15 out of 20 points
Relevance total score and rating		Score: <b>60 out of 100 points</b>  Rating: <b>Level 4: moderately unsuccessful</b>

COMPETE is relevant for Germany, both politically and economically. The project was also aligned with ASEAN's formal commitment to building an ASEAN Economic Community. Political commitment on the part of the CLMV countries to implementing and enforcing a competition policy is so far proving elusive, and their liberalisation of trade in services is guided by regional free-trade agreements, without a clear need for German support. The feeble political commitment to competition policy resulted mostly in an unqualified demand for GLZ support, with the possible recent exception of the CCF in Cambodia, which, as a competition authority, is at least building its institutional and policy frameworks. In its design, COMPETE insufficiently recognised the political nature of competition policy and trade in services, and the need to accompany technical assistance with active political and policy dialogue. The project responded well to the changes imposed by the COVID-19 pandemic and Germany's cessation of development cooperation with Myanmar but did not proactively adapt to the (emerging) political realities on competition policy and trade in services in the CLMV countries. **In total, the relevance of the project is rated as Level 4: moderately unsuccessful, with 60 out of 100 points.**

### Analysis and assessment of relevance

#### Relevance – Dimension 1: Alignment with policies and priorities

This first assessment dimension of the relevance criterion pertains to the political priorities of BMZ, as the donor, and the CLMV countries, as aid recipients. Their priorities can be gleaned from, on the one hand, formal policy papers, expressing the respective governments' vision, interests and commitments, and, on the other, these governments' actions on those commitments.

In 2020, the German Government published new guidelines for its engagement in the Indo-Pacific region. These guidelines recognised Asia's increased economic and political might, as well as – importantly – Asia's desire and intent to 'shape the international order of the 21<sup>st</sup> century' (FFO, 2020) (INT informants from German development cooperation (GDC) 1, 19, 23). The guidelines observe that: 'As a globally operating trading nation and proponent of a rules-based international order, Germany has a high interest in participating in Asia's growth dynamics, the shaping of the Indo-Pacific arena, as well as the implementation of global norms in regional structures' (FFO, 2020).

For Germany, this calls for increased collaboration on trade, investment and development, as well as 'enhancing the political dimension of the relationship [with Asian countries and institutions]' (FFO, 2020). The guidelines single out ASEAN as a key multilateral institution and entry point, as well as a counterweight to China's (potential) dominance of the region (INT GDC\_1, 23)<sup>7</sup>. The guidelines therefore call for 'strategic and intensified engagement with ASEAN ...[and] strengthening ASEAN's ability to act'. As such, Germany wants to upgrade its formal status, from being a development partner to becoming a dialogue partner of ASEAN (FFO, 2020) (INT GDC\_19, 23).

Relevant, effective and enhanced development cooperation offers one means of enhancing Germany's standing and relation with ASEAN. With more than EUR 200 million of development cooperation support over the last 10 years, Germany is the world's fifth largest donor to ASEAN (INT GDC\_1, 20). As such, the guidelines' intentions are already backed up with monetary support. BMZ engagement on regional economic integration offers a dual benefit in this regard. Besides sponsoring a core element of ASEAN and thereby offering political standing, 'the reduction of trade and investment barriers, including binding rules for ... competition policy, State-owned enterprises (SOE), subsidies and intellectual property rights ... promote better market access for German and European products', i.e. they also offer an economic benefit (FFO, 2020). Having said that, regional economic integration is not, or is only indirectly, part of BMZ's core areas for future development cooperation (BMZ, 2020).

The commitment of the ASEAN member states, including the CLMV countries, to regional economic integration, including through an ASEAN Economic Community that is open to trade in services and competition, was set out in section 2.1. This commitment has been backed up at the regional level with the conclusion of two consecutive free-trade agreements – the ASEAN Framework Agreement on Services (AFAS) and the ASEAN Trade in Services Agreement (ATISA), which foresee gradual trade liberalisation in services – and, at the national level, with the promulgation of (updated) competition laws in the CLMV countries and the establishment of a basic institutional structure to implement the competition laws and free-trade agreements (INT GDC\_4, 6, 7, 11, 12; informants from the direct target group (DTG) 1, 2, 4, 5, 7, 9, 11; informants representing other stakeholders (OS) 1, 4, 5, 9, 10, 11, 12).

Despite this formal commitment to competition policy and trade in services, the key informant interviews raised questions, directly and indirectly, about the CLV countries' commitment in practice and, concomitantly, the actual relevance of the project. These questions stemmed from the observations summarised in

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<sup>7</sup> Germany is not alone in adopting an Indo-Pacific strategy and using it as a counterweight to China's political and economic dominance in the region. 'America, Australia, Britain, France, India, Indonesia, Japan, the Philippines, Mongolia [and] South Korea' have one as well, with 'most of them ... having grown increasingly concerned about China's coercive tendencies [in the region]' (*The Economist*, 2023).

Table 5. In short, these observations reveal a weak political commitment to competition policy and freer trade in services.

Table 5: Field observations on the CLV countries' commitment to competition policy and trade in services

On competition policy	
<b>Cambodia</b>	<ul style="list-style-type: none"> <li>• The Cambodia competition law was adopted in 2021. CCF is currently building the institutional and policy frameworks to be able to start implementing the law and building a competition policy practice. CCF has, however, received limited resources – in terms of staff and, especially, discretionary budget – and relies heavily on external assistance.</li> <li>• The Cambodia Competition Commission contains 10 government and five independent members, with the latter supposed to be full-time, paid positions. In practice, the independent members are part-time at best, with a remuneration (which, as the time of the evaluation, was yet to commence) of less than 20 per cent of standard monthly salaries. While the independent members have appropriate professional/academic backgrounds, few have any political standing, and they questioned their own power and influence. The Commission has limited discretionary funds available.</li> <li>• While there is some momentum in the CCF in preparing the requisite institutional and policy frameworks, the competition law did take 10 to 20 years to come about, in no small measure owing to the fact that Cambodia was the last AMS without one (rather than because of intrinsic motivation).</li> </ul>
<b>Laos</b>	<ul style="list-style-type: none"> <li>• Despite having a competition law since 2015, there have been no competition cases brought before the Lao Competition Commission for adjudication. The competition division mentioned only two minor licensing cases that it was investigating.</li> <li>• The competition division of the Ministry of Industry and Commerce has just a handful of staff, limited financial resources, and authorities and processes that are not completely clear.</li> <li>• The Lao Competition Commission members are part-time, change frequently, have limited knowledge of and experience in competition policy, and profess a wariness to adjudicate cases, fearing that they cannot stand up to the legal teams of private companies.</li> <li>• Laos faces a severe financial crisis, with a risk of defaulting on its foreign debt, making competition policy and trade in services of secondary importance (The Economist, 2022).</li> </ul>
<b>Viet Nam</b>	<ul style="list-style-type: none"> <li>• Despite having a competition law since 2004, only six cases have been adjudicated, with the rulings of several having subsequently been overturned by the prime minister (VCCA, 2016; 2023).</li> <li>• While the competition law was updated in 2018, the establishment of the new adjudicating body – the National Competition Commission – remains pending.</li> <li>• The National Competition Commission is now envisaged under the Ministry of Industry and Trade, chaired by a vice-minister or director-general level, diminishing its political standing and influence.</li> <li>• The VCCA is competent but without substantive budget and active political support, its hands remain tied.</li> </ul>
<b>Regional</b>	<ul style="list-style-type: none"> <li>• The adoption of the competition law by the CLMV countries was driven by World Trade Organization (WTO) membership, free-trade agreements, and/or the desire to be seen as equals to their ASEAN peers, rather than an intrinsic motivation to promote competition.</li> <li>• Despite one attention-grabbing transnational case (the Uber/Grab merger in Asia), the need for a cross-border competition policy is not felt strongly by the AMS.</li> </ul>
Trade in services	
<b>All countries</b>	<ul style="list-style-type: none"> <li>• Despite moving, under ATISA, from a positive to a negative list<sup>8</sup>, the countries' negative lists will only come into force in 2029 (Viet Nam) and 2035 (Cambodia and Laos).</li> <li>• ATISA's predecessor, AFAS, introduced successive levels of increased liberalisation of trade in services. While the highest level is AFAS 12, Cambodia and Laos only follow AFAS 8 on, for example, the movement of natural persons and on transportation, and AFAS 7 on financial services.</li> <li>• To the extent that trade in services is liberalised, this is driven by regional free-trade agreements, such as ATISA, AFAS, the Regional Comprehensive Economic Partnership (RCEP) and, for Viet Nam, the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). Germany is seen as an indirect stakeholder in such agreements, however; the direct target groups are therefore hesitant to invite GIZ support. As a result, the project's direct target group expressed little demand for support, with the project consequently spending circa 80 per cent of its efforts and budget on competition policy rather than on trade in services.</li> </ul>

Sources: INT GDC\_4, 7, 12, 14, 18, 21; DTG\_1, 2, 4, 5, 7, 11; ITG\_1, 4, 7; OS\_3, 9, 10, 11

<sup>8</sup> In a positive list approach, the sectors that are open for trade in services are listed. In a negative list approach, all sectors are open for trade in services except those specifically singled out. The sectors on the negative list are subject to ASEAN negotiations.

Why does this divergence exist between the formal and actual political commitment from the CLMV countries to the competition policy and trade in services agendas? The reasons are mostly domestic in nature but also have a political-cultural aspect – characteristic of Southeast Asia – that underpins the ASEAN member states' complex relations with ASEAN and which makes ASEAN a relatively weak institution.

On the domestic front, each of the CLMV countries is effectively subject to one-party rule, with the party exercising a large influence on political and economic life, with varying degrees of reform-mindedness. In Viet Nam, the State has its origins in communism and central planning. While it has opened up under the Đổi Mới policy, State dirigisme prevails<sup>9</sup>. This is less about extracting public resources for self-gain as maintaining party control, both politically and economically. This is supported by the prevalence of State-owned enterprises, which are often led by influential party figures. In addition, the State is focused on investment and growth, rather than competition, based, in part, on the belief that scale offers efficiency gains and international competitiveness. As such, Viet Nam does not have a pure market economy and competition is not central to its cause. Finally, the State has no tradition of accountability, which a competition policy practice partly represents (INT GDC\_26; ITG\_1; OS\_3, 10, 11).

The story in Cambodia and Laos is different. In both countries, there is less political unity than in Viet Nam, but still a confluence of the political and economic elite, with a relatively small number of families and clans wielding significant power and influence. Within this setting, both governments focus on attracting foreign direct investment, promoting exports and generally fostering economic growth, while, at the same time, balancing this against protecting vested interests and domestic markets and, thereby, their hold on power. This is further complicated in Cambodia by the fact that 40 per cent of the economy operates off the books and, in Laos, by a government wary of reform, even in the face of a severe financial crisis. As in Viet Nam, competition is of secondary concern in both Cambodia and Laos, and trade only of interest to the extent that it profits the country and does not push SMEs out of business or threaten the interests of the economic elite (INT GDC\_2, 14, 18; ITG\_4; OS\_4, 5, 9).

Despite these opposing forces, some key informants did note that the countries and economies are changing, with growing middle classes and more distributed economic power (INT DTG\_7; ITG\_4; OS\_4, 9). This could, in principle and potentially, also change the political economy of and prospects for competition policy and trade in services in the future. For now, however, the above picture is confirmed by the Bertelsmann Transformation Index, which includes a sub-index on economic transformation that also reviews a country's competition policy practice and liberalisation of foreign trade (in goods and services).

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<sup>9</sup> For example, based on the Price Law 2012, the State directly intervenes to set or stabilise prices in air transportation, telecommunications, power, water, health care, education, tobacco, fuels, fertiliser, pesticides, vaccines for livestock and poultry, milk for children under six years of age, salt, sugar, rice, and medicines (Viet Nam National Assembly, 2012).

Table 6 gives the score – on a 1 to 10 basis, with 10 being the best – of the CLV countries in terms of their competition policy practice and liberalisation of foreign trade, including the associated qualitative classification of the countries. The data show that:

- all three countries score better on the liberalisation of trade than on the enforcement of competition policy,
- the scoring remained constant between 2016 and 2022, and
- Viet Nam scores better on the enforcement of competition policy than Cambodia and Laos.

Table 6: Bertelsmann Transformation Index – CLV scores on competition policy and trade

	Competition policy		Trade		Qualitative classification of scores
	2016	2022	2016	2022	
<b>Cambodia</b>	3/10	6/10	3/10	6/10	<b>On competition policy in Laos and Cambodia:</b> some regulation to prevent monopolistic structures and conduct exists but is rarely enforced.
<b>Laos</b>	3/10	7/10	3/10	8/10	<b>On competition policy in Viet Nam:</b> competition laws to prevent monopolistic structures and conduct exist but are enforced inconsistently.
<b>Viet Nam</b>	6/10	8/10	6/10	8/10	<b>On trade in CLV countries:</b> foreign trade is liberalised in principle, but significant exceptions remain, including differentiated tariffs and privileged treatment for domestic sectors or industries.

Source: (Bertelsmann Stiftung, 2022a; 2022b)

At ASEAN level, the member states see ASEAN first and foremost as a means to foster political and economic stability in the region, whereby each country can thrive economically while maintaining its sovereignty (INT GDC\_1, 19, 23, 26). The latter is key, with each constituting document of ASEAN reiterating the principle of non-interference in each country's domestic affairs (ASEAN, 1967; 2003; 2008a). Decision-making is consensus-based, effectively requiring all 10 members' consent to agree and proceed on any one issue (ASEAN, 2008a) (INT GDC\_19). As such, power rests with the member states rather than the ASEAN governing bodies, let alone the ASEAN Secretariat, which is small, with 99 staff members (ASEAN, 2022c), and without a meaningful discretionary budget (INT GDC\_1, 19; OS\_2). The ASEAN sectoral bodies and Secretariat depend to a large extent on external support to formulate and implement their work programme (ASEAN, 2023b; 2020b) (INT GDC\_20; OS\_2, 6, 12)<sup>10</sup>. For example, the ACAP was written by external consultants funded by a COMPETE predecessor project (INT GDC\_22; OS\_11). Without budget, carrots or sticks, ASEAN exerts limited influence, and progress depends on the member states, which are guided by domestic and party interests and tend to follow ASEAN only at their convenience (INT GDC\_2, 18; DTG\_1; ITG\_1; OS\_2, 3, 11). That ASEAN is not capacitated is further illustrated by the observation that CLMV countries' representatives – while personally and professionally committed – often have limited domestic political standing to translate the ASEAN commitments into action at home (INT GDC\_1; OS\_3).

In conclusion, ASEAN in general and the project specifically are highly relevant for Germany but – despite regional commitments to the contrary – of limited political priority for the CLMV countries. The latter is an important observation and caveat, as BMZ's 2030 Reform Strategy calls for 'reform partnerships', noting that 'the key to development is for partners to act on their own initiative. Our partner countries can and must deliver more' (BMZ, 2020). For this reason and those outlined above, the evaluation team assigns 15 out of 30 points to the project's alignment with the policies and priorities of Germany and the CLMV countries.

Relevance dimension 1 – Alignment with policies and priorities – scores **15 out of 30 points**.

## Relevance – Dimension 2: Alignment with the needs and capacities of the beneficiaries and stakeholders

While the first assessment dimension of relevance concerns the government level, this second dimension zooms in on the direct target group of the development cooperation: the people and organisations through which the project seeks to effect change. For COMPETE, these were the ministerial departments in the CLMV countries responsible for competition policy and trade in services, and the competition commissions – see

<sup>10</sup> The Consumer Protection and Intellectual Property Rights Division of the ASEAN Secretariat, which is also responsible for supporting AEGC and the ACAP, has four staff for consumer protection and competition policy. Similarly, the Services and Investment Division of the ASEAN Secretariat, responsible for all free trade agreements, has



Table 2 in section 2.1 for details.

Compared with the German competition authority, the relevant ministerial departments in Cambodia, Laos and Viet Nam are small – even when adjusted for population size (see Table 7). The table also shows that the relevant departments on trade in services do not fare much better in terms of staff numbers. Moreover, as noted above, these departments only have limited discretionary resources to commission studies or hire specialists for specific investigations/negotiations. In Cambodia and Laos, competition policy, the ministerial departments and the competition commissions are new and cannot fall back on an existing knowledge base. All in all, capacity is low and the needs are high.

The project provided support in the form of access to knowledge/experts and funding for the organisation of and participation in events. As such, the project was relevant. However, to be considered truly relevant, the project needed to have been embedded in and responding to a qualified demand for support. A ‘qualified’ demand exists when local reform actors have identified the challenge at hand, formulated a reform agenda, started implementing it – on their own initiative and of their own volition – and then derived from it any need for external support. Such a qualified demand was evident at the CCF in Cambodia to a considerable degree and at the VCCA in Viet Nam to some extent. The Cambodian and Lao competition commissions and the Lao competition division at the Ministry of Commerce have less of a grip on their tasks and possess less of an agenda for the future. The relevant departments on trade in services are guided by regional free-trade agreements, receive (extensive) support from other development/trading partners, and did not profess a clear need for support from COMPETE. This was also hampered by the fact that trade negotiations are conducted in secret and Germany/GIZ was considered an (indirect) party to such negotiations (INT GDC\_4, 6, 15; DTG\_1, 2, 4, 5, 7, 9, 11; ITG\_4; OS\_4, 5, 9, 11).

While the basic needs were considerable, this need was translated only to a limited extent into a qualified demand for support to which COMPETE could respond. The evaluation therefore assigns 20 out of 30 points to the project’s alignment with the needs and capacities of the direct target groups.

Relevance dimension 2 – Alignment with the needs and capacities of the beneficiaries and stakeholders – scores **20 out of 30 points**.

Table 7: Staff numbers in competition departments/agencies

	Competition policy			Trade in services		
		Total	Female		Total	Female
<b>Cambodia</b>	Competition division, CCF	29	14	Division TiS, Ministry of Commerce	7	1
<b>Laos</b>	Competition division, Ministry of Industry and Commerce	6	2	Division TiS, Ministry of Industry and Commerce	5	2
<b>Viet Nam</b>	Competition division, VCCA	61	14	Industry Services Sector Department, Ministry of Planning and Investment	29	10
<b>Germany</b>	Competition authority	400				

Source: COMPETE project partners (Bundeskartellamt, 2023)

### Relevance – Dimension 3: Appropriateness of the design

The BMZ Offer identified as a core problem the insufficient implementation, by the CLMV countries, of the AEC Blueprint and the ACAP. The stated reasons for the concomitant ‘implementation gap’ were the lack of knowledge, skills, strategies and action plans, inhibiting the responsible authorities from steering, coordinating and monitoring the implementation of the AEC Blueprint and the ACAP (GIZ, 2018c). The BMZ proposal did not question the existence and persistence of such a lack of knowledge, skills, strategies and action plans. Instead, it treated these as given. If only these gaps had been filled, then the CLMV countries could have implemented the AEC Blueprint and the ACAP and, consequently, implemented and enforced a competition policy and liberalised trade in services. Implicitly, the project assumed that the CLMV countries were on a path towards implementing the competition policy and trade in services agendas, because they had signed up to the ASEAN Charter and the AEC Blueprint.

Competition policy and trade in services are political topics. Competition policy affects business interests and State-owned enterprises; trade in services may affect livelihoods as domestic industries are replaced by imports. As such, they affect the government’s access to public resources, power bases and public support. The introduction, implementation and enforcement of competition policy and trade regimes will therefore be contested, bargained over and negotiated between different interest groups (SDC, 2020). This is not done in the open. As authoritarian states without a tradition of public political discourse or accountability, this is done in the corridors of power (Bertelsmann Stiftung, 2022a; EIU, 2021) (INT GDC\_14, 18). A close look at Viet Nam, which adopted a competition law back in 2004 as part of its accession to the World Trade Organization (WTO), could have foretold this. As noted above, despite the law, it still does not have an active competition policy practice.

If competition policy and trade in services were to have been promoted by Germany, this would have needed to be accompanied by political and policy dialogue to nudge the political decision-makers in the CLMV countries towards this end. It would have required a process to build a broad coalition of stakeholders, including the countries’ economic elite, in support of competition policy and trade in services and thus make it politically imperative for the governments to act (Acemoglu & Robinson, 2019). This was not part of COMPETE’s design and there is scant evidence that this reality was acknowledged during project implementation. Yes, COMPETE did help prepare a Q&A and background notes for parliamentarians in Cambodia in the run up to the parliamentary vote on the new competition law (GIZ, 2022c). However, these were technical notes, rather than part of an open political dialogue in which Cambodia’s political decision-makers were assisted in appropriating the competition law and recasting and shaping it into politically, economically and culturally appropriate policies for Cambodia.

COMPETE’s design was oriented towards the technical aspects of competition policy and trade in services without sufficiently taking into consideration the political nature of these topics. The evaluation therefore assigns 10 out of 20 points to the appropriateness of the project design.

Relevance dimension 3 – Appropriateness of the design – scores **10 out of 20 points**.

#### **Relevance – Dimension 4: Adaptability – response to change**

Clearly, the biggest change that befell the project was the COVID-19 pandemic. Besides its toll on (mental) health, the pandemic disrupted traditional working methods. The project partners were mostly ill-prepared for this, having insufficient IT infrastructure to move online *en masse*. The project responded swiftly by helping the project partners acquire the necessary IT (INT GDC\_6, 21; DTG\_2, 4, 5). Where meetings could not effectively be moved online – such as the envisaged inter-ministerial coordination meetings and public-private dialogue – the project accepted this reality and, instead, offered additional external expertise to develop the requisite policy and regulatory frameworks. The project also had no choice but to accept Germany’s cessation of its development cooperation with Myanmar. Through the extension of the project duration, the project was able to shift these resources to the other three countries. In all these cases, COMPETE proved flexible, adaptive and

reactive. While the project team internally recognised the difficult political environment for effectively promoting competition policy and trade in services, the project did not proactively adapt its approach accordingly. The project did not act on an evolving political economic context and reality. Based on these considerations, the evaluation assigns 15 out of 20 points to the adaptability of the project to change.

Relevance dimension 4 – Adaptability – response to change – scores **15 out of 20 points**.

### Methodology for assessing relevance

Table 8: Methodology for assessing OECD/DAC criterion: relevance

Relevance assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and limitations
<b>Alignment with policies and priorities</b>	<ul style="list-style-type: none"> <li>• ASEAN constitutional/ strategic documents and free-trade agreements</li> <li>• CLMV countries' competition laws</li> <li>• Germany's <i>Leitlinien zu Indo-Pazifik</i> and BMZ 2030 Reform</li> </ul>	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	The objectives and priorities of ASEAN, the CLMV countries and Germany were well-documented. The quality of data was good.
<b>Alignment with the needs and capacities of the beneficiaries and stakeholders</b>	The capacities and resources of the direct target group and the extent to which they had a qualified demand for support.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	The evaluation was able to engage directly with the direct target groups and enquire after their capacity and qualified demand for support. The quality of data was good.
<b>Appropriateness of the design*</b>	The project's results matrix and theory of change.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Evaluators' peer review</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul> <p>The purpose, scope and (dis-)advantages of the evaluation design and data collection methods are reflected on in section 3.2.</p>	The BMZ offer, the results matrix and the project team offered detailed information on the project's theory of change. The quality of the data collected was good.
<b>Adaptability – response to change</b>	Identification of main changes and emerging realities in the project context and the extent to which the project responded to these changes.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	The main changes have been articulated in the modification offers. The interviews gave insight into the emerging realities. The quality of data was good.
<p>* The project design encompasses the project's objective and ToC (GIZ results model, graphic illustration and narrative results hypotheses) with outputs, activities, instruments and results hypotheses, as well as the implementation strategy (e.g. methodological approach, capacity development strategy).</p>			

## Conflict sensitivity in the project design

The OECD/DAC marks the CLMV countries as fragile states. In an ex-ante Peace and Conflict Assessment, GIZ sketches a realistic and critical picture of the socio-political situation in Myanmar and Cambodia. It clearly lays down the potential for conflict as a result of the ethnic, social, economic and political strife in the two countries (GIZ, 2022f). The assessment was not translated into project strategies or actions, as the project topics were not seen to have a direct bearing on these sources of conflict (INT GDC\_8).

Instead, the project was perceived to be for the benefit of all consumers and businesses, irrespective of their political, economic and ethnic affiliations. The reason being that competition and trade policy should, at least from GIZ's perspective, apply equally to all organisations and people (INT GDC\_6). They should foster and protect an equal playing field. As such, the project should, if anything, have worked against the prevalence of a political-economic elite (albeit indirectly).

The project also promoted 'a rules-based international order', thereby contributing to SDG 16 – peace, justice and stronger institutions (GIZ, 2018c). Similarly, the project supported, through the implementation of the ACAP, 'a move towards greater harmonisation of competition policy and law in ASEAN' (ASEAN, 2020a). Such harmonisation is meant to lead to 'greater levels of integration' of ASEAN member states and thought to reduce conflict between the member states (GIZ, 2018c).

Table 9: Dividers/escalating factors in the project context

Which escalating factors/dividers were identified in the project context?	Addressed by the project? (yes/no)	If addressed, how were they considered by the project design?
The political-economic elite of the countries exploits the countries' economic resources for its own benefit (rent seeking) and/or protects domestic markets against foreign competition.	Yes	Competition policy and free trade in services should benefit all consumers and businesses, irrespective of their political, economic, ethnic or country affiliations, and ensure a level playing field.

Source: INT GDC\_6, 8

Table 10: Connectors/deescalating factors in the project context

Which deescalating factors/connectors were identified in the project context?	Addressed by the project? (yes/no)	If addressed, how were they considered by the project design?
A rules-based international order	Yes	Support the implementation of the AEC Blueprint 2025 and the ACAP.
Harmonisation of competition policy	Yes	As above.

Source: (GIZ, 2018c)

## 4.3 Coherence

This section analyses and assesses the coherence of the project. It is structured according to the assessment dimensions in the GIZ project evaluation matrix (see annex). This section also answers BMZ's question about the added value of COMPETE's accreditation to the Initiative for ASEAN Integration.

### Summarising assessment and rating of coherence

Table 11: Rating of OECD/DAC criterion: coherence

Criterion	Assessment dimension	Score and rating
Coherence	Internal coherence	35 out of 50 points
	External coherence	35 out of 50 points
Overall score and rating		Score: <b>70 out of 100 points</b> Rating: <b>Level 3: moderately successful</b>

COMPETE was part of a 'family' of four GIZ projects supporting ASEAN in general and the CLMV countries in particular in terms of regional economic integration and the implementation of the AEC Blueprint. In their design and orientation, these projects were internally coherent. With a few minor exceptions, the projects were nevertheless implemented in parallel, as each had its own project partners to work with and outcome indicators to fulfil. GIZ did work to ensure that all projects supporting ASEAN were aware of and communicated with each other. COMPETE did not seize the opportunity to work with a multi-donor governance programme in Laos to engage in political dialogue with the Lao government on competition policy and trade in services. Externally, COMPETE worked closely with the Australia and New Zealand-funded Competition Law Implementation Project (CLIP), offering complementary assistance to the competition authorities of the CLMV countries. COMPETE also ensured that its direct target groups were able to participate in training and events organised by other development partners. For the rest, COMPETE maintained open communication channels with other development partners and organised a regular development partner meeting on the sidelines of the AEGC.

**In total, the coherence of the project is rated as Level 3: moderately successful, with 70 out of 100 points.**

### Analysis and assessment of coherence

#### Coherence – Dimension 1: Internal coherence

COMPETE was part of a 'family' of four GIZ projects supporting ASEAN in terms of regional economic integration. The three additional members of the project family, and their respective aims, were:

- Consumer Protection in ASEAN (PROTECT), which sought to contribute to a conducive and competitive business environment by strengthening the national consumer protection systems (GIZ, 2020),
- Promotion of Sustainable Agricultural Value Chains in ASEAN (Agri-Trade), which aims to introduce quality and sustainability standards in agricultural value chains, thereby fostering cross-border agricultural trade (GIZ, 2022i), and
- Strengthening Regional Structures for SME Promotion in ASEAN (ASEAN SME), which seeks improved market access for ASEAN SMEs so they can expand their business regionally and internationally (GIZ, 2022j).

Each project tackled a distinct element of the regional economic integration agenda and the AEC Blueprint. As such, these projects were, in their design, complementary; they were what may be referred to as systemically

coherent. For example, any work by COMPETE on multi-mode/cross-border transport or strengthening the skills of the respective ministries of commerce in negotiating free-trade agreements could be of use and benefit to the agri-trade project in its efforts to strengthen regional agricultural value chains, or to the ministerial departments on trade in services in their participation in free-trade negotiations (INT GDC\_5, 16).

Regarding the extent to which this family of projects also offered opportunities for synergies during implementation, there were a few cases of collaboration. For example, COMPETE provided basic information on the national competition and trade in services policies in the CLMV countries to ASEAN Access – the information portal for SMEs set up by COMPETE's sister ASEAN SME project (INT GDC\_3, 5, 9). In Cambodia, COMPETE and PROTECT co-organised and implemented internal reflection workshops at CCF and awareness-raising events on the competition and consumer protection laws in the provinces, and developed a knowledge management platform for CCF (INT GDC\_12; ITG\_6). And in Laos, both COMPETE and PROTECT supported the Ministry of Commerce with the implementation of the national E-commerce Decree (INT GDC\_5; DTG\_6).

In general, however, each project had its own working areas and direct target groups (even when these were located within the same ministry), worked with different ASEAN Secretariat divisions and ASEAN sectoral working bodies, and was guided by its own results matrix and outcome indicators. Moreover, COMPETE had relatively small country-level budgets and, accordingly, relatively few country-level activities. As a result, the projects were, at their core, implemented in parallel rather than jointly and offered few operational synergies. They played on different chess boards and the outputs of one were not the inputs for the other(s) (INT GDC\_3, 9, 11, 20, 26; DTG\_2; ITG\_2; OS\_11).

GIZ recognised this and has developed an internal ASEAN strategy paper to foster, at a minimum, a good flow of information between team leaders and ensure that each contributes to the overall GIZ strategy and ASEAN regional economic integration agenda (GDC\_19, 21). GIZ did achieve operational efficiencies by having the four projects share office space, national support and administrative staff, and national consultants. In this evaluation, these efficiency gains are captured in section 4.6 on efficiency.

The previous section on relevance contained the observation that COMPETE insufficiently recognised the political nature of competition policy and trade in services, and the importance of engaging in political dialogue to move either topic forward. In Laos, GIZ is implementing a good governance programme: Citizen Engagement for Good Governance, Accountability and the Rule of Law (CEGGA), co-funded by BMZ, the European Union (EU) and the Swiss Agency for Development and Cooperation (SDC) (GIZ, 2021c) (INT GDC\_4, 14). This project includes regular political dialogue between the Lao Government and the German, EU and Swiss ambassadors. This project could, in principle, have offered an entry point for COMPETE to start political dialogue on competition policy.

In conclusion, COMPETE was coherent, in its design, with its sister projects supporting ASEAN in terms of regional economic integration. It either pursued or exploited the few opportunities that existed for synergies during project implementation. While systemic coherence is an achievement, the evaluation assigns 35 out of 50 points to COMPETE for internal coherence.

Coherence dimension 1 – Internal coherence – scores **35 out of 50 points**.



## Coherence – Dimension 2: External coherence

The project team offered a nice classification of its collaboration with other development partners. It distinguished between three ‘models’ of donor coordination, whose relevance was confirmed in the interviews.

- **Active and close coordination and collaboration.** This was with the Australia and New Zealand-funded Competition Law Implementation Project (CLIP), which facilitates the implementation of the ASEAN-Australia-New Zealand Free-Trade Agreement (AANZFTA). Whereas COMPETE helped the CLMV countries with their implementation of the ACAP, CLIP offered practical, hands-on, peer-to-peer support to the competition authorities, effectively coaching them on how best to go about their job. CLIP and COMPETE (team leaders) had known each other for 10 years, maintained close working relations and ensured the complementarity of their work. Moreover, during the COVID-19 pandemic, COMPETE was the eyes and ears of CLIP in the CLMV countries, as CLIP had no on-the-ground presence.
- **Mutual use or reinforcement of opportunities.** Japan, Korea and the OECD, among others, organised training and conferences on competition policy. COMPETE ensured that its partners in the CLMV countries participated in these training events and conferences, and, if needed, covered participation, travel, accommodation, venue and catering costs.
- **Acknowledgement and basic information-sharing.** Australia, the EU, the Economic Research Institute for East-Asia, the International Trade Centre, South Korea, Japan, the United Nations Conference on Trade and Development (UNCTAD) and the WTO, among others, offered support to the CLMV countries on trade in services (including e-commerce). While there were few direct interfaces, COMPETE maintained basic levels of communication and information-sharing. The national authorities or the ASEAN Secretariat also guided the development cooperation and ensured that the respective contributions were complementary and did not overlap (INT GDC\_5, 7, 12; DTG\_2, 5, 6; OS\_2, 8, 13).

In addition, COMPETE initiated a regular development-partner meeting on the sidelines of the ASEAN Expert Group on Competition (AEGC) to facilitate information-sharing and keeping each other up to date. These meetings included such development partners as Australia, the EU, Japan, the OECD, UNCTAD and the USA (INT\_OS 8, 11).

In sum, COMPETE collaborated closely with one development partner (Australia), especially in Cambodia. For the rest, COMPETE and its direct target groups endeavoured to ensure that the multitude of assistance was complementary and did not overlap. While information was shared, the development partners did not actively pursue synergies between their work. The evaluation therefore assigns 35 out of 50 points to COMPETE’s external coherence.

Coherence dimension 2 – External coherence – scores **35 out of 50 points**.

### COMPETE’s accreditation to the Initiative for ASEAN Integration

The Initiative for ASEAN Integration was originally foreseen as an instrument for the long-standing and relatively more developed members of ASEAN to support the new, less developed members in implementing ASEAN agreements and fostering their development (ASEAN, 2022d; 2020b). In practice, the initiative has evolved into one of ASEAN’s instruments to attract and organise its development cooperation with Singapore and third parties. The Initiative is essentially a collection of development cooperation projects loosely organised around strategic priorities identified in its recurrent multi-year work plan. Over the last two work-plan cycles, around 65–75 per cent of the projects were funded by Singapore and 25–35 per cent by development partners such as Australia, China, Japan and South Korea. There was no support under the framework from other AMS, such as Indonesia, Malaysia and the Philippines (ASEAN, 2021; 2022d).

The ASEAN Secretariat was unable to explain to the evaluation team how the Initiative, and the development cooperation projects it encompasses, were to contribute to narrowing the development gap between the CLMV countries and the AMS-6 – the ultimate objective of the Initiative – or what contribution the Initiative has

actually made over the past 22 years to narrowing this development gap. On the face of it, there does not appear to be a relationship between development partners' contributions to the Initiative and their status as strategic, dialogue or development partners of ASEAN – a status which appears to be determined by geopolitical and economic relations rather than development cooperation (ASEAN, 2023a). COMPETE's accreditation means that the project is part of the Initiative for ASEAN Integration work plan (INT OS\_6). The underlying idea is that it offers formal 'recognition' for Germany's contribution; in practice, it appears to offer little of practical value (INT GDC\_9, 18, 20, 23). Finally, while the ASEAN Secretariat expressed gratitude for Germany's development cooperation and contribution to the Initiative, Germany's collaboration with the ASEAN Secretariat is not dependent on accreditation. Of the four projects supporting ASEAN in terms of regional economic integration, only COMPETE was accredited over the last few years, with Agri-Trade having received its accreditation only recently (INT GDC\_6, 9).

The evaluation concludes that accreditation to the Initiative for ASEAN Integration might be nice to have but is not a must-have. BMZ should consider whether the effort to obtain accreditation is worth the potential additional recognition or contributes in any other meaningful way to its true objective of becoming a dialogue partner of ASEAN. In the meantime, the evaluation team has its doubts.

### Methodology for assessing coherence

Table 12: Methodology for assessing OECD/DAC criterion: coherence

Coherence: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and Limitations
<b>Internal coherence</b>	<p>The extent to which the project deliberately complemented and exploited synergies with other BMZ-funded, GIZ-implemented development cooperation interventions.</p> <p>The extent to which the project complied with the principle of leave no one behind (LNOB), human rights, gender equity and conflict-sensitive programme management.</p>	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Document analysis</li> <li>• Key informant interviews</li> <li>• Focus group discussions</li> </ul> <p>The purpose, scope and (dis-)advantages of the evaluation design and data collection methods are reflected on in section 3.2.</p>	<p>The purpose and scope of the 'family' of GIZ-implemented ASEAN projects are well-documented. Data were good, owing to the number and diversity of key informants.</p> <p>Data on the project's adherence to international norms were limited, as the project did not target, focus on, or need to apply these norms. This is except for gender equity, which is discussed in section 5.1 as part of the discussion of the follow-on project.</p>
<b>External coherence</b>	<p>The extent to which the project deliberately complemented international development-partner interventions and used existing (local and development) partner systems to create and exploit synergies.</p>	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Document analysis</li> <li>• Key informant interviews</li> </ul>	<p>Data were good, owing to the number and diversity of key informants.</p>



## 4.4 Effectiveness

This section analyses and assesses the effectiveness of the project. It is structured according to the assessment dimensions in the GIZ project evaluation matrix (see annex).

### Summarising assessment and rating of effectiveness

Table 13: Rating of OECD/DAC criterion: effectiveness

Criterion	Assessment dimension	Score and rating
Effectiveness	Achievement of the (intended) objectives	15 out of 30 points
	Contribution to achievement of objectives	20 out of 30 points
	Quality of implementation	10 out of 20 points
	Unintended results	10 out of 20 points
Overall score and rating		Score: <b>55 out of 100 points</b>  Rating: <b>Level 4: moderately unsuccessful</b>

COMPETE has helped the competition authorities in the CLMV countries translate their national competition laws into regulations and guidelines and build their institutional and staff capacities. It did so primarily by (i) providing access to external experts who have prepared ASEAN-level reference documents on competition policy (issues), drafted national decrees and regulations, and provided on- and off-the-job training; and (ii) enabling the participation of the Cambodian and Lao competition authorities in ASEAN meetings and international conferences. The institutional and policy frameworks in the CLMV countries nonetheless remains incomplete and a competition policy practice has yet to emerge. Moreover, the project was, to a significant degree, unable to attain its own results targets. On trade in services, there was limited demand for support, and what little the project provided was mostly limited to one-off workshops on the AFAS and the ATISA and enabling some internal government meetings. No noteworthy results were reported. **In total, the effectiveness of the project is rated Level 4: moderately unsuccessful, with 55 out of 100 points.**

### Analysis and assessment of effectiveness

#### Effectiveness – Dimension 1: Achievement of the (intended) objectives

COMPETE essentially sought to help implement the AEC Blueprint 2025 and the ACAP (GIZ, 2018c). This objective leaves room for interpretation. In a narrow interpretation, this would mean assisting in the implementation of the measures identified in the AEC Blueprint and translated into 'key action lines' in the Consolidated Strategic Action Plan (ASEAN, 2015; 2017)<sup>11</sup>. Most of these key action lines concern laws passed, regulations formulated, institutions set up, guidelines developed, studies conducted and capacity developed. They are output-oriented. COMPETE's outcome indicators are consistent with this interpretation.

A more expansive view of the objective statement is that the implementation of the AEC Blueprint 2025 and the ACAP should set the CLMV countries on a path towards the 'effective implementation of the national competition laws', 'deepen service integration in ASEAN' and thereby work towards 'a competitive, innovative, and dynamic ASEAN [with] a highly integrated economy' (ASEAN, 2015). As German development cooperation

<sup>11</sup> These 'key action lines' were later renamed as 'outcomes' (ASEAN, 2015; 2020a). Given the type of actions involved, however, the word 'outcomes' is a bit of a misnomer; it also risks confusion with the 'outcomes' of COMPETE discussed in this report. For this reason, the report authors have decided to retain the original terminology and refer to 'key action lines'.

seeks sustainable development and a strong ASEAN (BMZ, 2020; FFO, 2020) and because implementation of the AEC Blueprint and the ACAP is not a goal in itself, this evaluation adhered to this more expansive interpretation of COMPETE's objective statement. Consequently, the evaluation judged COMPETE both on its achievement of its outcome indicators and the extent to which an actual competition policy practice is emerging and barriers for trade in services are lowered (Engelsman & Thi Ngo, 2022).

We start with the first outcome indicator: '8 of 31 key action lines from the AEC Blueprint 2022 and the ACAP – as listed in the Consolidated Strategic Action Plan – have been implemented at the ASEAN level, during the duration of the project, under the leadership of one of the CLMV countries' (see also Table 14). In line with these key action lines, it helped produce at least 11 ASEAN-level knowledge products – all on competition policy. These included:

- a toolkit for formulating national enforcement strategies,
- a guideline for sharing merger cases in the AEGC information portal, and
- a regional study on exceptions and exemptions from competition laws.

Quantitatively, COMPETE achieved its target.

These products were, however, supposed to be produced 'under the leadership of one of the CLMV countries'. This proved only nominally to be the case. In practice, GIZ initiated, wrote and published the terms of reference for the recruitment of external consultants and these external consultants prepared the knowledge products. The CLMV representatives provided early comments and reflections on draft terms and reports (INT GDC\_21; DTG\_2, 4, 5; OS\_2, 5, 9, 11). While better than not participating, it is not an expression of CLMV leadership. COMPETE therefore did not achieve the target of the first outcome indicator in qualitative terms. The evaluators therefore consider this indicator to be only partly achieved.

The second outcome indicator required that 'in each of the CLMV countries, the responsible authorities have worked, during the duration of the project, on the practical implementation of the competition law and promoting trade in services'. Each of the countries worked on the implementation of the national competition laws. This was evident from the fact that the countries:

- are translating the national competition laws into the requisite decrees and regulations,
- conducted public outreach on the competition law, and
- developed the capacity of the ministerial departments and, where existing, the competition commissions.

In addition, in Viet Nam, the VCCA is handling merger notifications and investigating mergers, anti-competitive agreements and the misuse of dominant market positions, even though these cannot be concluded in the absence of the yet-to-be-established adjudicating body, the National Competition Commission (INT DTG\_2, 4, 5, 11; ITG\_7; OS\_1, 5, 9, 11).

This work did not translate into the achievement of the rather complicatedly formulated second outcome indicator. This indicator required that each of the countries fulfil three of four criteria (see Table 14). By the end of 2022, only one country (Cambodia) had managed this – at least according to the project team. The project team assigned a series of public outreach events to the private sector as encompassing 'public-private dialogue'. This is however not the evaluation team's reading of the project's intentions. The project had a specific workstream to develop and implement 'new formats' of public-private dialogue and inter-ministerial consultations to build support for competition policy and trade in services (GIZ, 2018c; 2023).

According to the project team, this proved the biggest challenge. Clearly, the COVID-19 pandemic did not help, as it prevented (larger-scale) face-to-face meetings for nearly two years. This is, however, not the full story. The lacklustre political support for competition policy and trade in services, the slow transition from adopting a competition law to enforcing it and COMPETE not being purposefully geared towards gaining political support and jump-starting a competition policy practice or negotiating freer trade in services – see section 4.2 – did not

help, either. In the end, few, if any, meetings of this type took place and certainly not in the ‘new format’ to which the BMZ proposal aspired (INT DTG\_2, 4, 5, 11)<sup>12</sup>.

The third outcome indicator sought an improvement in the ‘human resource development system’ of the ministerial departments on competition policy and trade in services. Especially in the competition policy departments, human resource capacity was developed. This was the product of:

- on-the-job and peer learning, as staff worked with external experts in preparing the requisite decrees and regulations to be able to enforce the national competition laws,
- training by these same external experts and the application of the train-the-trainer concept, as well as knowledge- and experience-sharing by departmental staff with colleagues, and
- attending international events and conferences, as well as ASEAN sector bodies’ meetings (INT\_DTG 2, 4, 5, 11; ITG\_7; OS\_1, 5, 9, 11).

Again, this did not translate into the achievement of the – equally complicatedly formulated – third outcome indicator. This indicator also required that each of the countries fulfil three of four criteria (see Table 14). By the end of 2022, only one country (Cambodia again) had managed this, according to the project team. The biggest challenge was the work on human resource ‘system’ improvements, as this was beyond the competence of COMPETE’s direct partners – the ministerial departments on competition and trade in services.

Beyond these outcome indicators, to what extent is an actual competition policy practice emerging and are barriers for trade in services being lowered in the CLMV countries? From the discussion on COMPETE’s relevance, especially the overview presented in

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<sup>12</sup> As for the public outreach events, their effectiveness can also be questioned. They entailed a handful of classic public information events to which the ministry invited interested businesses and provincial government representatives. As such, they reached, maximum, several hundred businesses, including SMEs, but each country has *thousands* of non-SME businesses. Little use was made of national news outlets or social media, both of which are pervasive in all countries, although, for example, in Cambodia, it was considered that the CCF was already tackling this sufficiently (INT GDC\_12; DTG\_2, 4, 5; ITG\_4, 6).

Table 5, it can already be gleaned that none of the CLV countries has a competition policy practice. In Laos, despite having a competition policy law since 2015 (Lao National Assembly, 2015) and a Lao Competition Commission since 2018 (Schaper & Burgess, 2021), no cases have been brought to the latter. Viet Nam has been waiting five years now for the National Competition Commission to be set up to adjudicate the cases investigated by the VCCA. While it is likely to be established eventually, it is unclear and uncertain what power it will hold and political backing it will receive to do its job.

Of the three evaluation mission countries, Cambodia appears to have the most momentum at the moment. It approved its competition law in 2021, has since prepared 15 (out of an estimated required 18) sub-decrees and regulations, and the CCF is led by a charismatic and competent director-general, who garnered the support of a competent and energetic director and a small and ambitious team of staff. The CCF expects to start enforcing the competition law in 2023, albeit lightly at first. As the saying goes, the proof of the pudding will be in the eating. This will also be true for Cambodia, where only time will tell how the tension between the competition law and vested political and economic interests will play out. For the arguments laid out in

Table 5, a certain caution and wariness in terms of expectations is called for. In sum, Cambodia, Laos and Viet Nam are, at best, working towards a competition policy practice but for now do not have one. (INT DTG\_2, 4, 5, 11; ITG\_1, 4, 7; OS\_1, 2, 3, 5, 9, 10, 11, 16).

As for the promotion of trade in services – as evident from the removal of trade barriers – the interviews did not identify a single example of a reduction in (non-)tariff trade barriers. This is not surprising and can be explained by the fact that COMPETE was engaged on the topic only to a limited extent – see the next sub-section.

Based on the above observations and considerations, the evaluation concludes that COMPETE only partly achieved either its formal outcome indicators or its aim to bring about an emerging competition policy practice or freer trade in services. The evaluation therefore assigns 15 out of 30 points to the achievement of the objectives.

The evaluation concludes that all three objective indicators were partly achieved by the end of the project. Effectiveness dimension 1 – Achievement of the (intended) objectives – scores **15 out of 30 points**.

Table 14: Assessed and adapted objective indicators (outcome level)

Project's objective indicator according to the (last modification) offer	Assessment according to SMART* criteria	Specified objective indicator
<p><b>Outcome indicator 1</b> 8 of 31 key action lines from ASEAN's strategy documents on competition policy and trade in services have been implemented under the leadership of one of the CLMV countries.</p> <p>Base value: 0 Target value: 8 Current value (October 2022): 11 Achievement in quantitative terms (October 2022): 131%. The evaluation considers this outcome indicator to be only partly achieved, however, as the key action lines were not truly implemented 'under the leadership of one of the CLMV-countries'. Sources: (GIZ, 2018c; 2021b; 2022d; 2022e; GIZ, 2023)</p>	<p>Is the 'specified' indicator (see right-hand column):</p> <ul style="list-style-type: none"> <li>• specific: yes, it defines the key action lines, at which level these need to be implemented (ASEAN), and under whose leadership this needs to occur (CLMV countries),</li> <li>• measurable: yes, the number of key action lines that have been implemented can be ascertained, validated and counted,</li> <li>• achievable: yes, the key action lines pertain to decrees, regulations, institutions, guidelines, capacity development, etc. that can be realised within a three-to-four-year time period,</li> <li>• relevant: yes, the key action lines offer an indication of the extent to which the CLMV countries are implementing the AEC Blueprint 2025 and serious about competition policy and trade in services,</li> <li>• time-bound: yes, the target value needs to be achieved within the project duration.</li> </ul>	<p>The original objective indicator was not specific. The project team clarified it. <b>This resulted in the following specification:</b></p> <p>8 of 31 key action lines from the AEC Blueprint 2022 and the ACAP – as listed in the Consolidated Strategic Action Plan – have been implemented at ASEAN level, during the duration of the project, under the leadership of one of the CLMV countries.</p>
<p><b>Outcome indicator 2</b> In each of the CLMV countries an improvement in the implementation of investment-conducive and pro-competition regulations on competition policy and trade in services is demonstrated through three of the following four criteria:</p> <ul style="list-style-type: none"> <li>• short-term operational plans have been implemented as part of a new medium- or long-term national strategy document,</li> </ul>	<p>Is the 'specified' indicator (see right-hand column):</p> <ul style="list-style-type: none"> <li>• specific: yes, it clearly defines purpose and criteria,</li> <li>• measurable: yes, the requisite plans, documents and events can be ascertained, validated and counted,</li> <li>• achievable: yes, the requisite plans, documents and events can be conducted within the project duration,</li> </ul>	<p>The original objective indicator was not specific: it is unclear what 'regulations' were being referred to. The project team clarified it as follows: 'regulations' refer to 'implementing regulations' or the 'main regulatory framework', e.g. bylaws, decrees, regulations that detail the competition law.</p>

Project's objective indicator according to the (last modification) offer	Assessment according to SMART* criteria	Specified objective indicator
<ul style="list-style-type: none"> <li>• draft documents for improving the institutional set-up (implementing regulations, guidelines, etc.) are available,</li> <li>• three public-private dialogue events have been conducted for each of the two topics,</li> <li>• three inter-ministerial coordination meetings have been conducted on each of the two topics.</li> </ul> <p>Base value: 0 Target value: 3 out of 4 criteria fulfilled for both competition policy and trade in services in each country. Current value (December 2022): 1 country/1 area (CP) of 4 countries/2 areas. Achievement in %: 12.5% Sources: (GIZ, 2018c; 2021b; 2022d; 2022e; GIZ, 2023)</p>	<ul style="list-style-type: none"> <li>• relevant: yes, the requisite plans, documents and events indicate that the countries are building the requisite architecture for applying the competition law and liberalising trade in services,</li> <li>• time-bound: yes, the target value needs to be achieved within the project duration.</li> </ul>	<p>The four criteria are to 'indicate' whether the CLMV countries are working on the implementation of the competition law (i.e. its introduction and enforcement 'in practice') and promoting free trade in services. <b>This resulted in the following specification:</b></p> <p>In each of the CLMV countries, the responsible authorities have worked, during the duration of the project, on the practical implementation of the competition law and promoting free trade in services.</p> <p>The criteria to 'prove' this outcome indicator remain the same – see left-hand column.</p>

Project's objective indicator according to the (last modification) offer	Assessment according to SMART* criteria	Specified objective indicator
<p><b>Outcome indicator 3</b> In each of the CLMV countries, two agencies or ministries in charge of competition policy or trade in services show an improvement of their human resources development system according to the following criteria:</p> <ul style="list-style-type: none"> <li>• two trainers or mentors conducted a total of four domestic training sessions per year,</li> <li>• e-learning tools on competition policy and trade in services are available,</li> <li>• a library or info point is equipped with international literature, as well as new national analyses/studies/reviews,</li> <li>• two new staff development plans include measures to promote gender equality.</li> </ul> <p>Base value: 0 Target value: 3 out of 4 criteria fulfilled for both competition policy and trade in services in each country. Current value (December 2022): 1 country/1 area (CP) of 4 countries/2 areas. Achievement in %: 12.5% Sources: (GIZ, 2018c; 2021b; 2022d; 2022e; GIZ, 2023)</p>	<p>Are the indicator and the criteria clear and:</p> <ul style="list-style-type: none"> <li>• specific: yes, purpose and criteria are clearly defined,</li> <li>• measurable: yes, the trainers, training sessions, tools, libraries, and plans can be ascertained, validated and counted,</li> <li>• achievable: yes, the trainers, training sessions, tools, libraries, and plans can be achieved within the project duration,</li> <li>• relevant: yes, the trainers, training sessions, tools, libraries, and plans indicate that the countries are building the requisite architecture for applying the competition law and liberalising trade in services,</li> <li>• time-bound: yes, the target value needs to be achieved within the project duration.</li> </ul>	<p>As above, the results are to be attained 'during the duration of the project' – see also comments below.</p>
* SMART: specific, measurable, achievable, relevant and time-bound		

## Effectiveness – Dimension 2: Contribution to achievement of objectives

In the previous section, the finding that the outcome objectives were only partly achieved was discussed. To the extent that results were achieved, what was COMPETE's contribution? This section seeks to answer this question by assessing the extent to which the project's results hypotheses (as formulated in section 2.2) held up in practice. The assessment took the form of a contribution analysis – effectively, an enquiry into the answers to five questions, which, collectively, allow for a qualitative judgement to be made on the project's contribution to the observed results<sup>13</sup>. In the following paragraphs, each of the four results hypotheses is analysed and assessed in turn.

**Results hypothesis 1 (short version):** *If COMPETE advises and supports the ministerial departments on competition policy and trade in services, then these departments will lead the operationalisation of key action lines from the AEC Blueprint 2025 and the ACAP, and implement both in their country.*

The extent to which this results hypothesis held up in practice can be directly inferred from the discussion in the previous sub-section. The operationalisation of the key action lines entailed, in practice, the preparation of knowledge products. The process was led by GIZ and the knowledge products were written by external

<sup>13</sup> These five questions, as originally formulated by Mayne (2008), are: (i) Are the assumptions underlying the theory of change plausible and uncontested? (ii) Did the envisaged activities take place? (iii) Is there evidence that the assumed changes in behaviour, decisions and actions occurred in practice? (iv) Were the envisaged results achieved? (v) Could other contextual factors have reasonably and significantly contributed to the results?



consultants. These products were deemed valuable by the ministerial departments on competition policy. They served as a reference for these departments in preparing the requisite national sub-decrees and regulations (INT DTG\_2,4,5). As such, they helped build the institutional framework for competition policy in the CLMV countries, as was also assumed under the results hypothesis. They did not trigger, nor directly lead to an emerging competition policy practice. Several other results hypothesis assumptions did not hold up in practice, therefore:

- The ministerial departments on competition policy did not have the requisite capacity, resources and political backing to lead the operationalisation of the key action lines and translate this into domestic competition policy practice (see also section 4.2).
- Competition is not seen as economically and politically imperative by the CLMV countries, and their exposure to and participation in the AEGC and other ASEAN meetings did not foster the requisite public and political support for actively pursuing a competition policy practice (see also section 4.2).

Whilst the results hypothesis did not hold, to the extent that the knowledge products were used in building the national institutional framework on competition policy, COMPETE did directly contribute.

### **Competition policy versus trade in services: some observations**

Observant readers will have noticed that the above paragraph, and much of this report, is tilted towards the topic of competition policy, whereas COMPETE had a dual focus – on competition policy *and* trade in services. COMPETE never really did gain traction on trade in services. While it was aware of the project, the ASEAN Coordinating Committee on Services (CCS) and the Services and Investment Division of the ASEAN Secretariat did not voice a demand for support and did not know the details of the project's offer and activities. As further highlighted below, the ministerial departments on trade in services in the CLV countries also made little use of COMPETE's offer of support.

Several potential reasons were given. Trade in services is part of well-established and ongoing negotiations on trade liberalisation, both within ASEAN (in relation to the AFAS and the ATISA) and with trading partner(s) (blocks) in such free-trade agreements as the Regional Comprehensive Economic Partnership (RCEP) and the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). While not directly part of these specific agreements, Germany is seen as party to these negotiations, also because the EU and ASEAN are in negotiations. This makes the ministerial parties reluctant to ask for support and collaborate with GIZ. Finally, GIZ (and the COMPETE team) have a long history in working on competition policy in Southeast Asia and, concomitantly, established relations with the relevant ministerial departments and expert networks, which it lacks in trade in services.

None of these arguments, individually, is very convincing. Both the ASEAN Secretariat and CLV countries received support on trade in services from other development partners, such as Australia, the EU, the Economic Research Institute for East Asia, South Korea, UNCTAD or the US (INT DTG\_7; OS\_12, 13). GIZ has access to international experts on trade in services. Still, collectively, they may have worked together to limit COMPETE's traction on the topic. According to its own estimates, the project team spent about 80 per cent of its time and resources on competition policy and 20 per cent on trade in services. In moving forward under COMPETE II, GIZ should further investigate the (real) reasons for the limited support (offer) on trade in services and, depending on its findings, adjust its ambition and offer accordingly.

Sources: INT\_GDC 16; DTG\_1, 7, 9; OS\_4, 12, 13

**Results hypothesis 2 (short version):** *If the project supports the ministerial departments on competition policy and trade in services, then these departments will set up the requisite policy and institutional frameworks, implement the AEC Blueprint 2025 and the ACAP, and work towards an active competition policy practice and trade liberalisation.*



As noted, while the CLMV countries do not yet have a competition policy practice, the ministerial departments on competition policy are setting up the requisite policy and institutional frameworks. In doing so, they built on COMPETE support, especially:

- external experts – some international, but mostly national – who helped write decrees (e.g. investigation procedure), develop guidelines (e.g. on leniency policy) and/or conducted market studies (e.g. on e-commerce),
- study visits, to learn from the competition policy practice of Germany, the Netherlands, the Philippines and/or Viet Nam,
- funding of their participation in international conferences on competition policy (organised by ASEAN, the OECD and/or UNCTAD) and, especially for cash-strapped Laos, in ASEAN AEGC meetings, as well as the 8<sup>th</sup> and 9<sup>th</sup> ASEAN Conferences on Competition, and
- funding and organisation of outreach events to inform businesses, line ministries and/or provincial governments about the competition policy (INT\_DTG 2, 4, 5, 6; OS\_2, 4, 5, 8, 9, 10, 11).

The ministerial departments and competition commissions also received support from other development partners (INT\_DTG 2, 4, 5; OS\_8, 9, 11). This shows that the ministerial departments on competition policy have the interest, willingness and tenacity to work on competition policy. The lack of unequivocal political support and the concomitant allocation of resources nevertheless prevent these departments from moving forward rapidly and purposefully working towards building an actual competition policy practice. The results hypothesis thus held in part and COMPETE did contribute to the extent that policy and institutional frameworks were built.

Regarding trade in services, here, COMPETE's support was of a different nature. It entailed less frequent and direct support from (inter-)national experts. Instead, most support encompassed the organisation and funding of a limited number of internal government consultations, workshops and public outreach events. At times, this included agenda-setting and expert selection; at other times, it merely involved covering venue and catering costs (because COMPETE assessed that, without a proper venue and catering, the relevant meetings/events might not be pushed through). To this end, practical support was provided for:

- conducting workshops and preparing/disseminating background material (including a guidebook and video series) on the AFAS and the ATISA, including the meaning and implications of the negative list (see footnote 8), both for the relevant ministries and the private sector,
- developing a strategic plan (Cambodia), a market study (on the logistics sector in Viet Nam) and a comparative study on trade in services in free-trade agreements (Cambodia), and
- migrating and supporting a national information portal on trade in services in Laos (including with two interns) – a portal that was originally set up and supported by the World Bank (INT\_GDC 11, 12; DTG\_1, 7, 9).

This support was deemed valuable by the respective ministerial departments, which generally asked for more extensive support going forward. The support did not, however, translate into concrete results.

**Results hypothesis 3 (short version):** *If the project advises and funds the organisation of inter-ministerial coordination meetings and public-private dialogue, then the partner organisations will develop and implement new formats for inter-ministerial coordination and public-private dialogue and implement the key action lines of the AEC Blueprint 2025 and the ACAP in their country.*

Even if one or two events were held in each country that could be seen as part of public-private dialogue or inter-ministerial coordination, the fact is that no new formats were developed and translated into purposeful, structured and regular consultation and dialogue. The purported reasons for this were discussed in the previous sub-section. This workstream was therefore not really executed and the results hypothesis remains untested.

**Results hypothesis 4 (short version):** *If the project advises partner organisations and funds IT hardware and online learning platforms, then the partner organisations will develop and implement new, gender-equitable, staff development systems on competition policy and trade in services, and implement the key action lines of the AEC Blueprint 2025 and the ACAP in their country.*

In the previous sub-section, it was conveyed that COMPETE did build human-resource capacity. In addition, it helped build a knowledge management platform for CCF in Cambodia (covering both competition policy and consumer protection). The partner organisations did not translate this support into new staff development 'systems', as this went beyond their competence and authority. It is, however, fair to conclude – based on the feedback and the fact that the ministerial departments on competition policy did translate COMPETE's support into setting up the policy and institutional frameworks (see results hypothesis 2) – that COMPETE's capacity development did contribute to the results achieved, even if this had not yet (at the time of the evaluation) resulted in an active competition policy practice. COMPETE was not alone in providing capacity development support on competition policy. As noted, in Cambodia, Australia provides significant support as well. Historically, Cambodia also received support from France and South Korea (INT\_DTG 5; OS\_9). COMPETE's support is nonetheless recognised and appreciated. In conclusion, while the results hypothesis did not hold, COMPETE did contribute to capacity-building.

#### **How to measure capacity development of competition authorities?**

The project team noted at the evaluation outset that the impacts of support on competition policy are notoriously hard to measure (see section 1.2). It subsequently wondered how best to measure the capacity development of competition authorities as an intermediate milestone. For the evaluation team, the best proxy for capacity development is the extent to which the authorities are able to independently develop the requisite regulatory and policy frameworks, as well as investigate and adjudicate competition policy cases. Against this measure, both CCF and VCCA proved somewhat capable of developing regulations and policies. For example, CCF stated that it developed six of the requisite 18 sub-decrees itself but noted that it simply lacked the number of staff to develop all 18.

Table 15: Selected results hypotheses for effectiveness

<b>Hypothesis 1 (activity – output – project objective)</b>	If COMPETE advises and supports the ministerial departments on competition policy and trade in services, then these departments will lead the operationalisation of key action lines from the AEC Blueprint 2025 and the ACAP and implement both in their country.
<b>Main assumptions</b>	<ul style="list-style-type: none"> <li>• The partner organisations have the interest, knowledge, capacity, incentive, political support, negotiating prowess, willingness and tenacity to act on the key action lines of the AEC Blueprint 2025 and the ACAP, and lead the operational planning of their implementation in the AEGC and CCS.</li> <li>• The project offered the requisite guidance and funding for the partner organisations to lead the operational planning of selected key action lines from the AEC Blueprint 2025 and the ACAP.</li> <li>• ASEAN's economic integration is economically and politically imperative for the CLMV countries to act on, gain from and not lose out on the ASEAN Economic Community, and the implementation of the key action lines is critical to bringing about ASEAN's economic integration.</li> <li>• CLMV's active participation in the AEGC, CCS and other ASEAN conferences (including those organised in the CLMV countries) – and the exposure, knowledge and perspectives gained from these meetings and conferences – will foster public and political support for ASEAN economic integration.</li> <li>• While ASEAN has no stick with which to enforce either the Charter or the AEC Blueprint 2025, guidelines developed at ASEAN level and experiences from other ASEAN countries are used by CLMV countries to shape their policies and approaches.</li> </ul>
<b>Risks/unintended results</b>	No unintended results identified
<b>Alternative explanation</b>	The extent to which the AEC Blueprint 2025 and the ACAP are implemented – even if only nominally – depends on the CLMV countries' political commitment to ASEAN in general and the AEC Blueprint and ACAP specifically.
<b>Confirmed/partly confirmed/not confirmed</b>	Partly confirmed
<b>Hypothesis 2 (activity – output – project objective)</b>	If the project supports the ministerial departments on competition policy and trade in services, then these departments will set up the requisite policy and institutional frameworks, implement the AEC Blueprint 2025 and the ACAP, and work towards an active competition policy practice and trade liberalisation.
<b>Main assumptions</b>	<ul style="list-style-type: none"> <li>• The partner organisations have the interest, knowledge, capacity, incentive, political support, negotiating prowess, willingness and tenacity to act on the key lines of action and set up the requisite policy and institutional frameworks.</li> <li>• The project offers the requisite guidance to create and set up the requisite policy and institutional frameworks, as well as practical support, focusing on actions nascent competition authorities face.</li> <li>• ASEAN's economic integration is economically and politically imperative for the CLMV countries to act on, gain from and not lose out on the ASEAN Economic Community, and the implementation of the key action lines is critical to bringing about ASEAN's economic integration.</li> </ul>
<b>Risks/unintended results</b>	No unintended results identified
<b>Alternative explanation</b>	The extent to which the AEC Blueprint 2025 and ACAP are implemented – even if only nominally – depends on the CLMV countries' political commitment to ASEAN in general and the AEC Blueprint and the ACAP specifically.
<b>Confirmed/partly confirmed/not confirmed</b>	Partly confirmed
<b>Hypothesis 3 (activity – output – project objective)</b>	If the project advises and funds the organisation of inter-ministerial coordination meetings and public-private dialogue, then the partner organisations will develop and implement new formats for inter-ministerial coordination and public-private dialogue and implement the key action lines of the AEC Blueprint 2025 and the ACAP in their country.

<b>Main assumptions</b>	<ul style="list-style-type: none"> <li>• The partner organisations have the interest, knowledge, capacity, incentive, political support, negotiating prowess, willingness and tenacity to develop and implement new formats for inter-ministerial coordination and public-private dialogue.</li> <li>• The project offers the requisite guidance to develop and implement new formats for inter-ministerial coordination and public-private dialogue.</li> <li>• There are no veto players in the CLMV countries that can scupper the implementation of the key action lines from the AEC Blueprint 2025 and the ACAP.</li> <li>• Inter-ministerial coordination fosters inter-ministerial consensus on the implementation of the AEC Blueprint 2025 and the ACAP.</li> <li>• An informed private sector supports, advocates for and contributes to the implementation of the AEC Blueprint 2025 and the ACAP.</li> </ul>
<b>Risks/unintended results</b>	No unintended results identified
<b>Alternative explanation</b>	Not applicable/no results
<b>Confirmed/partly confirmed/not confirmed</b>	Not confirmed
<b>Hypothesis 4 (activity – output – project objective)</b>	If the project advises partner organisations and funds IT hardware and online learning platforms, then the partner organisations will develop and implement new, gender-equitable, staff development systems on competition policy and trade in services, and implement the key action lines of the AEC Blueprint 2025 and the ACAP in their country.
<b>Main assumptions</b>	<ul style="list-style-type: none"> <li>• The partner organisations have the interest, knowledge, capacity, incentive, political support, authority, autonomy, willingness and tenacity to develop and implement new, gender-equitable, staff development systems on competition policy and trade in services.</li> <li>• The project offers the requisite guidance to develop and implement new, gender-equitable, staff development systems on competition policy and trade in services.</li> </ul>
<b>Risks/unintended results</b>	No unintended results identified
<b>Alternative explanation</b>	The CLMV countries' lacklustre political support for competition policy and trade in services means the necessary commitments and resources to develop new staff development systems on competition policy and trade in services are lacking.
<b>Confirmed/partly confirmed/not confirmed</b>	Not confirmed

To the extent that the CLMV countries did build institutional and policy frameworks on competition policy, COMPETE did contribute through its support at both ASEAN and country levels. COMPETE's contribution to the trade in services agenda was, however, limited. Moreover, COMPETE's contribution cannot be fully disentangled from the non-, or at best partial, achievement of its outcome objective. As argued in sections 4.2 and 5.1, COMPETE could have done more on political and policy dialogue and, concomitantly, on inter-ministerial dialogue and public-private dialogue. The evaluation therefore assigns 20 out of 30 points to COMPETE's contribution to the achievement of objectives.

Effectiveness dimension 2 – Contribution to achievement of objectives – scores **20 out of 30 points**.

### **Effectiveness – Dimension 3: Quality of implementation**

The quality of implementation is roughly based on five considerations, namely whether the project conducted regular context and results analysis, responded in a timely manner to project and context developments, made use of synergies with other interventions, used the monitoring system and involved all stakeholders. First of all, the project team had vast and in-depth knowledge of competition policy, ASEAN and Southeast Asia. It was

knowledgeable and attuned to the state of play of competition policy in the CLMV countries. It was also conscious of the fact that the introduction of competition policy represents a change process that, if it is to be successfully negotiated, requires a strategic mindset on the part of its direct project partners. The team built on this knowledge, experience and insight intuitively and informally.

While it kept close tabs on its partners, the project team did not explicate the assumptions underpinning its theory of change – including expected responses from its partners – nor did it regularly and explicitly test whether these assumptions held up in practice. There is a case to be made for doing so and not just relegating this to external evaluations. The human condition is that we tend to forget unwritten thoughts and intentions. Moreover, as a regional project with a regionally dispersed team, there were distributed responsibilities and different levels of experience, skills and authority. By explicating and monitoring the project's theory of change as a team, explicit and more comprehensive insights into what works, what doesn't and why would be gained, and allow for active project steering. As evidenced in section 4.2, while the project responded to external changes such as the COVID-19 pandemic, it did not actively and purposefully respond to the difficult and complex political economy of competition policy and trade in services in the CLMV countries.

In section 4.3, in turn, it was demonstrated that the project team made little use of opportunities provided by other projects. And while it had plenty of ideas to do so in the future, these ideas appeared to be ad hoc and not part of a purposeful strategy to promote a competition policy practice or freer trade in services. The project team did involve – over and beyond its direct partners in the CLMV countries – the AEGC, CCS and ASEAN Secretariat. Again, as argued in section 4.2, it did not sufficiently engage with the political and policy decision-makers to garner political support for the implementation of competition policy and the promotion of trade in services.

In short, while the project team clearly benefited from vast and deep knowledge of competition policy and ASEAN, project implementation could have been more active, purposeful and outcome-oriented. For that reason, the evaluators assign 10 out of 20 points to the quality of project implementation.

Effectiveness dimension 3 – Quality of implementation – scores **10 out of 20 points**.

#### **Effectiveness – Dimension 4: Unintended results**

The OECD/DAC evaluation standards (OECD, n.d.) and the GIZ project evaluation matrix (see annex) require evaluations to look out for unintended results, whether positive or negative. The evaluators enquired among the key informants about possible unintended results. The key informants to this evaluation identified no such results, either positive or negative. The subsequent question is how to rate the non-occurrence of unintended results. The evaluation team presumed that the occurrence of negative results would result in 0 points and positive results could (in an ideal case) result in the allocation of 20 points. Based on this logic, the evaluation assigns 10 out of 20 points to the non-occurrence of unintended results.

Effectiveness dimension 4 – Unintended results – scores **10 out of 20 points**.

Photo 2: The art of doing (© Conor Wall, undated, courtesy of GIZ)



## Methodology for assessing effectiveness

Table 16: Methodology for assessing OECD/DAC criterion: effectiveness

Effectiveness: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and limitations
<b>Achievement of the (intended) objectives</b>	The extent to which COMPETE met the target values of its outcome indicators, competition policy is practised and trade barriers on services are being reduced.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>Quantitative and qualitative enquiry</li> </ul> <p><b>Evaluation methods:</b></p> <ul style="list-style-type: none"> <li>Quantitative data collection</li> <li>Document review</li> <li>Key informant interviews</li> </ul> <p>The purpose, scope and (dis-)advantages of the evaluation design and data collection methods are reflected on in section 3.2.</p>	<p>Qualitative data were good, owing to the number and diversity of key informants.</p> <p>Quantitative data on actual competition policy practice and reduction of trade barriers were limited and inconsistent in type and quality across the countries.</p>
<b>Contribution to achievement of objectives</b>	The project's theory of change, including results hypotheses.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>Theory-based evaluation</li> <li>Contribution analysis</li> </ul> <p><b>Evaluation methods:</b></p> <ul style="list-style-type: none"> <li>Document review</li> <li>Literature review</li> <li>Key informant interviews</li> </ul>	Data were good, owing to the number and diversity of key informants.
<b>Quality of implementation</b>	The extent to which the project team actively and effectively steered on the achievement of the project objectives, including through: <ul style="list-style-type: none"> <li>regular context and results analysis,</li> </ul>	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>Document analysis</li> <li>Key informant interviews</li> </ul>	Data were good albeit resting on fewer and a less diverse set of key informants.



Effectiveness: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and limitations
	<ul style="list-style-type: none"> <li>• timely responses to project and context developments,</li> <li>• making use of synergies with other interventions,</li> <li>• using the M&amp;E system, and</li> <li>• involving all stakeholders.</li> </ul>		
<b>Unintended results</b>	Open enquiry among all key informants to the evaluation into the (unintended) outcomes of the project, the benefits and risks emanating from them, and how the project responded to them.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Key informant interviews</li> </ul>	Data were good, owing to the number and diversity of key informants.

## 4.5 Impact

This section analyses and assesses the impact of the project. It is structured according to the assessment dimensions in the GIZ project evaluation matrix (see annex).

### Summarising assessment and rating of impact

Table 17: Rating of OECD/DAC criterion: impact

Criterion	Assessment dimension	Score and rating
<b>Impact</b>	Higher-level (intended) development changes/results	5 out of 30 points
	Contribution to higher-level (intended) development results/changes	10 out of 40 points
	Contribution to higher-level (unintended) development results/changes	15 out of 30 points
<b>Impact score and rating</b>		<b>Score: 30 out of 100 points</b>  <b>Rating: Level 5: unsuccessful</b>

The CLMV countries have yet to start enforcing their competition laws and building a competition policy practice. The evaluation found that the political economy in the CLMV countries does not favour the emergence of an active and effective competition policy practice. The chances for consumers to benefit from cheaper and better-quality products and services thanks to an effectively enforced competition policy are considered slim, therefore. If, despite the odds, the CLMV countries do proceed with building an active and effective competition policy practice, COMPETE will have made an important technical contribution to the ability of the competition authorities to execute their mandate. The political momentum and support, however, will have emanated from domestic political considerations, free-trade agreements and/or ASEAN peer pressure. Trade in services increased significantly over the last 20 years on the back of economic growth and subsequent rounds of trade liberalisation under, among others, the ASEAN Framework Agreement on Services (AFAS). COMPETE did not contribute to these developments. **In total, the impact of the project is rated Level 5: unsuccessful, with 30 out of 100 points.**

## Analysis and assessment of impact

### Impact – Dimension 1: Higher-level (intended) development changes/results

The OECD/DAC defines impact as the extent to which an intervention has generated or – and this is important for this evaluation – ‘is expected to’ generate positive development impacts (OECD-DAC, 2019). Chapter 2 defined COMPETE’s intended impact as ‘the extent to which trade in services and investment increases’ and ‘consumers gain access to cheaper and better-quality products and services’. In section 4.4, it was demonstrated that COMPETE did little work on trade in services and that, at the time of this evaluation, none of the CLMV countries had a competition policy practice.

The question to be answered in this section, therefore, is how likely is it that the CLMV countries will start enforcing their competition laws and develop an active and effective competition policy practice that will – in due course – translate into ‘consumers gaining access to cheaper and better-quality products and services’? The project team was confident, pointing to the Philippines and Thailand, where, 15 to 20 years after adopting a competition law, competition policy is gaining traction. It was beyond the scope and resources of this evaluation to validate this assertion and analyse the progress, impacts and underlying dynamics in the Philippines and Thailand.

Based on the political economy in the CLMV countries, as elaborated on in section 4.2, the odds are clearly stacked against an active and effective competition policy practice emerging in the CLMV countries. Consequently, the evaluation team believes there is no more than a one-in-four chance that the CLMV countries will, indeed, pursue and succeed in implementing an active and effective competition policy practice. The chances for consumers to benefit from cheaper and better-quality products and services thanks to an effectively enforced competition policy are, by extension, equally slim.

It is tempting to see Cambodia as the exception. After passing the competition law in 2021, an energetic and competent CCF has gone out of its way to translate the law into an implementation framework. Even in Cambodia, however, one-party rule, the multitude of State- and party-related businesses, the political focus on international competitiveness rather than domestic competition, all compounded by a huge informal economy, make for a difficult environment for competition policy to take root. Of course, we could and hope to be wrong in our assessment.

The story is different for trade in services. A look at the trade data makes this abundantly clear. Figure 3 shows the cumulative growth in the exports and imports of services over the last 20 years. The data reveal tremendous growth (before the COVID-19 pandemic hit). Although this growth emanated from a low base, key informants attributed this to high economic growth (see also Figure 4), the digitalisation of the economies and concomitant changes in the structure of the CLMV economies, with the services sector gaining ever more prominence. The prominent trade-in-services sectors are transportation, finance, construction, professional services, e-commerce and tourism. The ASEAN countries are also adopting ever-higher degrees of trade in services liberalisation under the ASEAN Framework Agreement on Services (AFAS). The ASEAN Trade in Services Agreement (ATISA) will give a further push, as ASEAN adopts a negative list approach, further limiting the services sectors’ protection from international competition and trade. However, the negative list is not expected to come into force in Viet Nam until 2029 and in Cambodia and Laos until 2035. It will thus be a while before its benefits are felt by consumers and businesses. Finally, regional free-trade agreements, such as the Regional Comprehensive Partnership (RCEP), also push for trade in services (INT\_DTG 1, 7, 9; ITG\_4, 7; OS\_4, 12, 13).

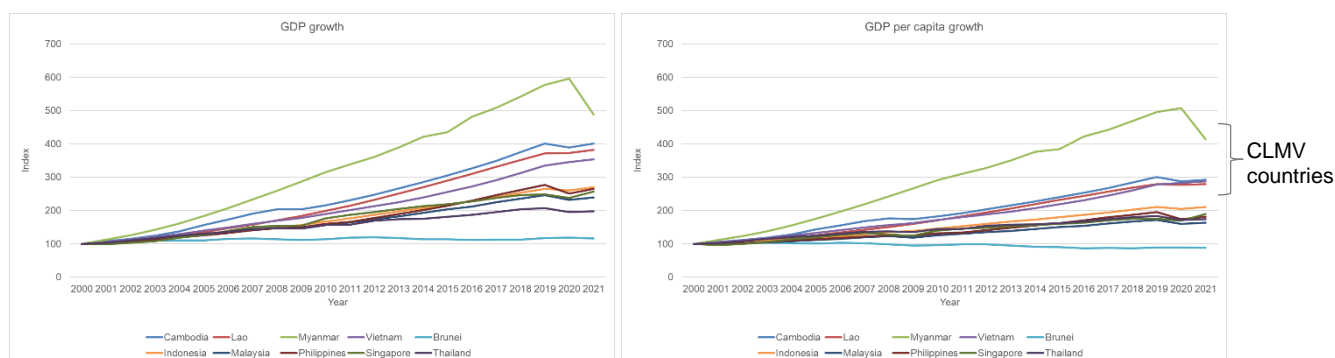


Figure 3: Growth in trade in services since 2000

## COMPETE and the Initiative for ASEAN Integration and Narrowing the Development Gap

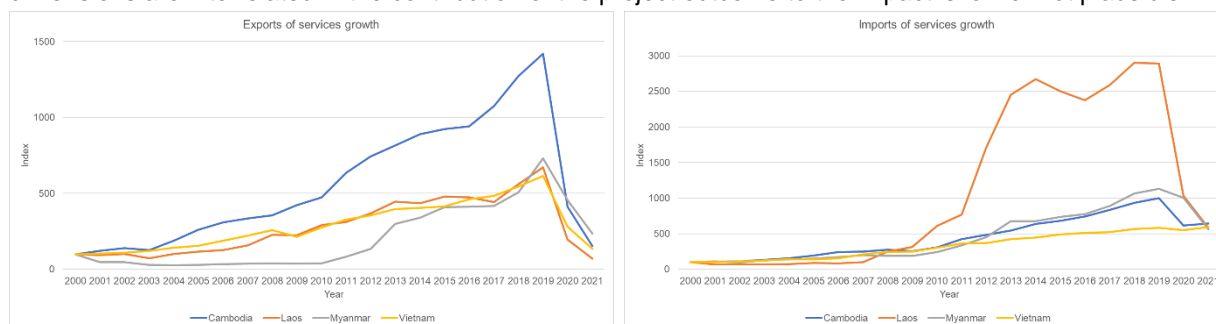
COMPETE was implemented as part of the Initiative for ASEAN Integration, whose overall objective was to narrow the development gap between the CLMV countries and the AMS-6. Accordingly, BMZ asked the evaluation team to determine the extent to which COMPETE contributed to this objective. We will argue in the next section that COMPETE has not (yet) contributed. It is nevertheless worthwhile, as background, to see whether the CLMV countries are catching up. Figure 4 shows the cumulative GDP and GDP-per-capita growth since 2000 of all ASEAN member states. On both accounts, the CLMV countries record the highest cumulative growth. As such, they are closing the development gap as measured by GDP growth.

Figure 4: Cumulative GDP growth of the CLMV countries vis-à-vis the other ASEAN member states



Source: World Bank DataBank World Development Indicators

In sum, the implementation of competition policy in the CLMV countries is a daunting prospect and whether its impacts will materialise is uncertain. Trade in services is gradually being liberalised and is increasing, and its effects are likely to be felt by consumers and businesses alike in the form of access to a wider variety of and better-priced services. COMPETE has not meaningfully contributed to this increase in trade in services, however. GIZ's Corporate Unit Evaluation notes in that regard that 'the first and second assessment dimensions are interrelated: if the contribution of the project outcome to the impact is low or not plausible



Source: World Bank DataBank World Development Indicators and World Integrated Trade Solution; and ASEAN statistics

(second assessment dimension), this must also be considered for the assessment of the first assessment dimension'. Based on these findings and guidance, the evaluation assigns 5 out of 30 points to the likely achievement of higher-level intended development results.

Impact dimension 1 – Higher-level (intended) development changes/results – scores **5 out of 30 points**.

## Impact – Dimension 2: Contribution to higher-level (intended) development results/changes

Without a prevalent competition policy practice in the CLMV countries, we are forced to build on our analysis in section 4.4 on effectiveness to ascertain COMPETE's possible contribution to future impacts. There, we argued that, to the extent that the CLMV countries have set up institutional and policy frameworks on competition

policy, COMPETE did contribute through its mobilisation of national and international experts. At the same time, we observed that COMPETE did little to foster political dialogue on, and political commitment to, implementing the national competition laws. To the extent that the CLMV countries will implement competition laws, this will be because of domestic considerations, free-trade agreement provisions and/or ASEAN peer pressure. Moreover, section 4.7 on sustainability argues that COMPETE's contribution can easily dissipate the longer the CLMV countries take to actually start enforcing their laws. In other words, while COMPETE is making an important, technical, contribution for now, its contribution to the actual emergence of impacts (if any) will be limited.

The story on trade in services is simpler. As argued in section 4.4 on effectiveness, COMPETE only provided support as and when necessary to facilitate some meetings and get government officials acquainted with the AFAS and ATISA agreements. It did not engage in or contribute to subsequent AFAS standards or the ATISA. In other words, COMPETE did not contribute to actual reductions in trade in services barriers or, by extension, to the (likely further) increase in trade in services as illustrated in Figure 3.

Based on these observations, the evaluation assigns 10 out of 40 points to COMPETE's contribution to likely development impacts.

Table 18: Selected results hypotheses for impact

<b>Results Hypothesis 1 (project objective – impact)</b>	If the CLMV countries implement the AEC Blueprint and the ACAP and, accordingly, adopt a competition policy practice and liberalise trade in services, then consumers will gain access to cheaper and better-quality products and services.
<b>Main assumption</b>	<ul style="list-style-type: none"> <li>• There is functioning and effective competition policy oversight.</li> <li>• More competition exists in the CLMV markets.</li> </ul>
<b>Risks/unintended results</b>	No unintended impacts have been identified
<b>Alternative explanation</b>	Consumers and businesses in the CLMV countries gain better access to cheaper and better-quality products and services, owing to increased trade.
<b>Confirmed/partly confirmed/not confirmed</b>	Not confirmed
<b>Results Hypothesis 2 (project objective – impact)</b>	If the CLMV countries implement the AEC Blueprint and the ACAP and, accordingly, liberalise trade in services, then trade and investment in services will increase between the CLMV countries and the ASEAN countries.
<b>Main assumption</b>	<ul style="list-style-type: none"> <li>• (Non-tariff) trade barriers have been removed.</li> <li>• Service standards/regulations have been harmonised between countries.</li> <li>• CLMV countries offer an interesting market (for each other).</li> <li>• CLMV businesses, including SMEs, possess a comparative or competitive advantage vis-à-vis the ASEAN countries and are ready and able to invest in and trade with other countries.</li> </ul>
<b>Risks/unintended results</b>	No unintended impacts have been identified
<b>Alternative explanation</b>	Trade in services increases owing to economic growth, a changing structure of the CLMV economies, and trade liberalisation under the AFAS, ATISA and regional free-trade agreements, e.g. the Regional Comprehensive Economic Partnership (RCEP).
<b>Confirmed/partly confirmed/not confirmed</b>	Not confirmed

Impact dimension 2 – Contribution to higher-level (intended) development results/changes – scores **10 out of 40 points**.

Photo 3: Mural, Ministry of Industry and Commerce, Laos (© Geert Engelsman, 2022)



### Impact – Dimension 3: Contribution to higher-level (unintended) development results/changes

The OECD/DAC evaluation standards (OECD, n.d.) and the GIZ project evaluation matrix (see annex) require evaluations to look out for unintended results, whether positive or negative. The evaluators enquired among the key informants about possible unintended impacts. The key informants to this evaluation identified ‘no unintended impacts’, either positive or negative. The subsequent question is how to rate the non-occurrence of unintended impacts. The evaluation team presumed that the occurrence of negative impacts would result in 0 points and positive impacts could (in an ideal case) result in the allocation of 30 points. Based on this logic, the evaluation assigned 15 out of 30 points to the non-occurrence of unintended impacts.

Impact dimension 3 – Contribution to higher-level (unintended) development results/changes – scores **15 out of 30 points**.

### Methodology for assessing impact

Table 19: Methodology for assessing OECD/DAC criterion: impact

Impact: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and limitations
<b>Higher-level (intended) development changes/results</b>	<p>The extent to which there is functioning and effective competition policy oversight by the competition authorities, which is ‘likely’ to result, in the medium to long term, in cheaper and better-quality products and services on the domestic markets.</p> <p>The extent to which (non-tariff) barriers to trade in services are being lowered, which is ‘likely’ to result, in the short to medium terms, in an increase in cross-border trade and investment in services.</p>	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>Quantitative and qualitative enquiry</li> </ul> <p><b>Evaluation methods:</b></p> <ul style="list-style-type: none"> <li>Quantitative data collection</li> <li>Document review</li> <li>Key informant interviews</li> </ul> <p>The purpose, scope, and (dis-)advantages of the evaluation design and data collection methods are reflected on in section 3.2.</p>	<p>Qualitative data were good, owing to the number and diversity of key informants.</p> <p>Quantitative data were scarce on competition policy practice and good on trade in services at the aggregate level.</p>

Impact: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and limitations
<b>Contribution to higher-level (intended) development results/changes</b>	The project's theory of change, including impact hypotheses.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Theory-based evaluation</li> <li>• Contribution analysis</li> </ul> <b>Evaluation methods:</b> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	Data were good, owing to the number and diversity of key informants.
<b>Contribution to higher-level (unintended) development results/changes</b>	Open enquiry among all key informants to the evaluation into any likely unintended impacts of the project and the benefits and risks emanating from them.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Document analysis</li> <li>• Key informant interviews</li> </ul>	Data were good, owing to the number and diversity of key informants.

## 4.6 Efficiency

This section analyses and assesses the efficiency of the project. It is structured according to the assessment dimensions in the GLZ project evaluation matrix (see annex).

### Summarising assessment and rating of efficiency

Table 20: Rating of OECD/DAC criterion: efficiency

Criterion	Assessment dimension	Score and rating
<b>Efficiency</b>	Production efficiency (Resources/Outputs)	35 out of 70 points
	Allocation efficiency (Resources/Outcome)	15 out of 30 points
<b>Efficiency score and rating</b>		<b>Score: 50 out of 100 points</b>  <b>Rating: Level 4: moderately unsuccessful</b>

COMPETE spent roughly 80 per cent of its time and budget on competition policy and 20 per cent on trade in services. This was valid, as, on competition policy, there was both more demand and, partly, more momentum. This evaluation report has, so far, argued that competition policy and trade in services are quintessentially political topics and, consequently, require political buy-in. While there was, nominally, political support, in practice it left much to be desired. Still, COMPETE took a mostly technical approach, implicitly assuming that the presence of institutional and policy frameworks on competition policy would herald a competition policy practice. COMPETE could have used its third output area – the formulation and implementation of new formats for inter-ministerial coordination and public-private dialogue, which it did not pursue owing to the COVID-19 pandemic – as a stepping-stone to embed the project and its efforts in political and policy dialogue, helping to build a broad coalition in support of an active competition policy practice. While there would have been no guarantee that this would be successful, if it had been, it could have led to better results with the same (or fewer) resources. **In total, the efficiency of the project is rated Level 4: moderately unsuccessful, with 50 out of 100 points.**

## Analysis and assessment of efficiency

The OECD/DAC defines efficiency as ‘the extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way’ (OECD-DAC, 2019). ‘Economic’ means that inputs are converted into results without waste, i.e. are produced in a ‘cost-effective’ way. ‘Timely’ means that the results are delivered within the intended time frame, or a time frame reasonably adjusted to the evolving context.

The starting point for assessing the project’s efficiency is determining how the project’s resources have been spent and whether these resources were spent in time. The GIZ Corporate Unit Evaluation efficiency tool helped the project team allocate all expenditures and costs to the corresponding project components/outputs.

Figure 5 and Figure 6 show how the overall project budget was spent across the four output areas/workstreams (GIZ, 2023). Our exchanges with the project team on this allocation of costs resulted in the following qualitative picture of how the project budget had been spent:

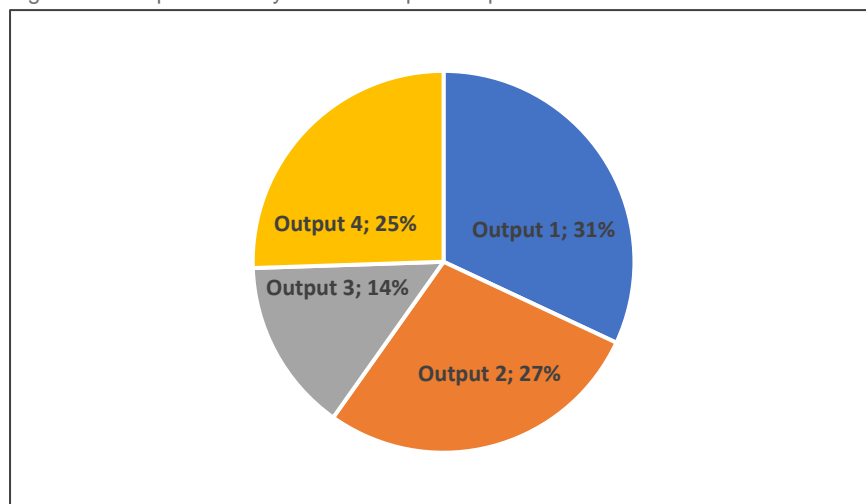
- The project team shared that it spent roughly 80 per cent of its time and budget on competition policy and 20 per cent on trade in services.
- Project implementation concentrated on developing ASEAN-level reference documents on competition policy (output area 1) and building the requisite institutional and policy frameworks in the CLMV countries<sup>14</sup> (output area 2).
- Except for some discretionary outlays (such as for developing a knowledge management portal for CCF in Cambodia), capacity development of the national competition authorities (output area 4) went hand-in-hand with building the institutional and policy frameworks, i.e. the external experts recruited sought to transfer their knowledge to the staff of the competition authorities while developing particular decrees, guidelines or manuals.
- Relatively little time and budget was spent on the formulation and implementation of new formats for inter-ministerial coordination and public-private dialogue on competition policy and trade in services in the CLMV countries (output area 3). As noted in section 4.2, this was ascribed to the COVID-19 pandemic, which precluded larger gatherings for nearly two years.

Figure 5: Cockpit Efficiency Tool: overall costs and achievements per module indicator

	Output 1	Output 2	Output 3	Output 4
<b>Outputs</b>	The operational planning for implementing the key action lines included in new or existing strategy documents is finalised.	Institutional and organisational requirements for implementing improvements in the implementation of investment-conducive and pro-competition regulations are established in selected national agencies or ministries.	New approaches for inter-ministerial coordination and public-private dialogue are introduced.	Agencies or ministries responsible for competition law or trade in services introduced new approaches for improving their human resources development systems.
<b>Actual sum of individual costs</b>	EUR 1,053,539.10	EUR 917,721.39	EUR 483,201.60	EUR 841,134.88
<b>Partner inputs</b>	EUR 0.00	EUR 0.00	EUR 0.00	EUR 0.00
<b>Sum of individual costs and partner inputs</b>	<b>EUR 1,053,539.10</b>	<b>EUR 917,721.39</b>	<b>EUR 483,201.60</b>	<b>EUR 841,134.88</b>
<b>Sum in %</b>	<b>30.77%</b>	<b>26.80%</b>	<b>14.11%</b>	<b>24.56%</b>

<sup>14</sup> As noted in chapter 2, the project disengaged with Myanmar after the military coup in 2021.

Figure 6: Cockpit Efficiency Tool: costs per component



The GIZ Corporate Unit Evaluation distinguishes between production and allocation efficiency. Production efficiency investigates how economically inputs are converted into outputs. Allocation efficiency concerns the conversion of inputs into outcomes. In both cases, the interest of the GIZ Corporate Unit Evaluation lies less in passing judgement than in learning whether (i) the same

results could have been achieved with fewer resources, or (ii) better results could have been achieved through a different allocation of resources. The lessons derived from the evaluation can inform future programming. The next two sub-sections contain analyses of the project's production and allocation efficiency, respectively.

### Efficiency – Dimension 1: Production efficiency

For COMPETE, the two guiding questions from the previous paragraph turn out to concern different sides of the same coin. In section 4.2, it was observed that both competition policy and trade in services are quintessentially political topics. In section 4.4, it was argued that for COMPETE to have been truly successful political buy-in into the competition policy and trade in services agenda was required. While there was, nominally, political support, it left much to be desired. This meant that COMPETE would have needed to engage in political and policy discourse on the needs and merits of competition policy and trade in services. While there was (and is) no guarantee of success for such political engagement – especially given the CLMV countries' difficult, contrarian, political economies – there was (and is) no way around it, as it constitutes a *sine qua non* for building both an institutional and a policy framework and for pursuing an effective competition policy practice and trade in services regime.

Instead, COMPETE took a mostly technical approach, supporting the competition authorities with technical expertise to progress in implementing their mandate. In the same vein, it appears to have seen its planned work on inter-ministerial dialogue and public-private dialogue as a channel to inform line ministries and private sector representatives about the competition policy and the AFAS/ATISA, rather than as a means to gauge and foster public and political support for competition policy and trade in services.

By allocating more resources to its third output area, thereby working on gaining and fostering political support, COMPETE could have achieved better results. At the same time, greater political buy-in and resource allocation from the CLMV countries to the implementation of the competition policy and trade in services agenda would have allowed COMPETE to achieve the same (and probably better) results with fewer resources. The evaluation therefore concludes that COMPETE's production efficiency could have gained from a different allocation of resources among its four output areas.

COMPETE, together with its sister projects (see section 4.3), did achieve other efficiency gains. By sharing the office and administrative staff, the project family could collectively save on office rent and administrative staff costs. Being situated in the same offices in all countries of operation also allowed for easy backstopping, thus ensuring smooth implementation of the projects.



Project data in the efficiency tool also confirmed that COMPETE did not achieve most of its outputs during the project term (GIZ, 2023). The project therefore did not meet the second dimension of the efficiency criterion, namely the ‘timely’ delivery of results.

In sum, the evaluation assigns 35 out of 70 points to production efficiency.

Efficiency dimension 1 – Production efficiency – scores **35 out of 70 points**.

### Efficiency – Dimension 2: Allocation efficiency

Allocation efficiency relates to the conversion of inputs into outcomes. In practice, allocation and production efficiency are closely related. For example, effective (even if not comprehensive) institutional and policy frameworks (outputs) are needed for a country to pursue an active and effective competition policy practice (outcome). The arguments above regarding the sub-optimal production efficiency of COMPETE therefore also apply to its allocation efficiency. Both its outputs and outcomes would have benefited from effective political and policy dialogue. Had it turned out that in one or more countries the political conditions were not favourable for the effective implementation of competition policy or trade in services, then the project could have reallocated its resources to countries with greater potential for success, or GIZ, in consultation with BMZ, could have transferred part of the budget to other projects. Moreover, in section 4.4, it was demonstrated that COMPETE did not achieve its outcomes, in time or otherwise. Hence, the evaluation assigns the same relative score to COMPETE’s allocation efficiency, namely 15 out of 30 points.

Efficiency dimension 2 – Allocation efficiency – **scores 15 out of 30 points**.

### Methodology for assessing efficiency

Table 21: Methodology for assessing OECD/DAC criterion: efficiency

Efficiency: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and limitations
<b>Production efficiency</b> (Input/Outputs)	The extent to which the project could have achieved the same outputs with fewer resources or better outputs through a different allocation of resources.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Follow-the-money approach</li> <li>• Contribution analysis</li> <li>• Yield maximisation and cost minimisation analysis</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Efficiency tool</li> <li>• Key informant interviews</li> </ul>	Project results and financial data were reported according to GIZ standards and were well documented.
<b>Allocation efficiency</b> (Input/Outcome)	As above, on the outcome level.	As above.	As above.

## 4.7 Sustainability

In this section, the sustainability of the project is analysed and assessed according to the assessment dimensions in the GIZ project evaluation matrix (see annex).

### Summarising assessment and rating of sustainability

Table 22: Rating of OECD/DAC criterion: sustainability

Criterion	Assessment dimension	Score and rating
Sustainability	Capacities of the beneficiaries and stakeholders	10 out of 20 points
	Contribution to supporting sustainable capacities	15 out of 30 points
	Durability of results over time	20 out of 50 points
Sustainability score and rating		Score: <b>45 out of 100 points</b>  Rating: <b>Level 5: unsuccessful</b>

COMPETE directly contributed to developing parts of the institutional and policy frameworks for competition policy in the CLMV countries, as well as building institutional and human capacities. The institutional and policy frameworks remain incomplete, however, and a competition policy practice has yet to emerge. Political support is weak, as, although the countries do promote economic growth, investment and trade, they do not necessarily believe in competition, and competition policy can undermine vested interests and power structures. Politically induced changes in the leadership and staffing of the competition authorities could easily erode the gains made. While ASEAN and free-trade agreements offer some counterweight, they are not strong enough to ensure that the CLMV countries will pursue an active competition policy practice or promote trade in services. **In total, the sustainability of the project is rated Level 5: unsuccessful, with 45 out of 100 points.**

### Analysis and assessment of sustainability

#### Sustainability – Dimension 1: Capacities of the beneficiaries and stakeholders

The sustainability of COMPETE's results depend on the capacity, incentive, political support, authority, autonomy and tenacity of the ministerial departments regarding competition policy. The building blocks for their assessment can be found in section 4.2 on relevance and section 4.4 on effectiveness. The key findings were as follows:

- The CLMV countries' governments focus on economic growth, investments and trade and do not strongly believe in or value competition. As a consequence, competition policy has, so far, received limited political support or priority.
- There is neither a robust institutional framework nor an emerging competition policy practice benefiting important political groups, which would ensure that gains made are maintained.
- To the extent that progress has been made on building institutional and policy frameworks, this has been led by the ministerial departments on competition policy, which are underfunded and understaffed.

This offers, at best, a fragile basis for a future competition policy practice. A politically induced change in leadership at the ministerial departments responsible for competition policy, with an even weaker political mandate, coupled with a change of a handful of staff, could quickly erode the gains made and dissipate the knowledge gathered.



A positive, albeit weak, counterweight is provided by the fact that COMPETE relied to a significant degree on national experts to support the CLMV countries in preparing the requisite decrees and guidelines. The project thus contributed to strengthening in-country knowledge of and capacity regarding competition policy. As legal professionals are, to a large degree, bound to their country, owing to the uniqueness of each country's legal framework and certifications, this knowledge is likely to remain in-country and available.

Another counterweight is provided by the CLMV countries' political commitment to the ASEAN Charter, the AEC Blueprint and the ACAP. However, these agreements lack the carrots and sticks with which to enforce their provisions (ASEAN, 2008a; 2015; 2020a); (INT GDC\_19; DTG\_2; OS\_2,11). The ASEAN Secretariat recognises this and has now put forward the idea of developing a legally binding ASEAN Framework Agreement on Competition similar to the Framework Agreement on Trade in Services (AFAS). For now, this is just an idea that still needs to be negotiated between the member states. Still, the CLMV countries' political commitment is likely to mean the countries will at least keep up the appearance of pursuing implementation of a competition policy. The countries' free-trade agreements are likely to have a similar effect.

All in all, competition policy rests on a weak base. In terms of trade in services, few results have been recorded, so there is little to sustain. In section 4.2, it was discussed how the ministerial departments on trade in services are not better off, generally having even less staff than the competition policy departments. The countries' free-trade agreements will nevertheless keep trade in services on the agenda. The evaluation concludes that the political, institutional and human capacities are both weak and fragile. As such, the evaluation assigns 10 out of 20 points to the capacities of the beneficiaries and stakeholders to sustain the results.

Sustainability dimension 1 – Capacities of the beneficiaries and stakeholders – scores **10 out of 20 points**.

### **Sustainability – Dimension 2: Contribution to supporting sustainable capacities**

It has already been argued, in section 4.4, that to the extent that institutional and human capacities were built in the CLMV countries, COMPETE did contribute. While other development partners also contributed and COMPETE failed to take into account the political dimension of implementing competition policy and trade in services, it did offer, through external experts and funding, hands-on and targeted support to ministerial departments and competition commissions to develop national regulations and guidelines, build staff capacity and expose staff to international experiences. This support was appreciated and valued. However, the lack of work on the politics of competition policy and trade in services (see section 4.2) places a large question mark over the future of the former in the CLMV countries. The future of the latter is less precarious, as trade in services is pushed more by legally binding free-trade agreements and the countries' promotion of economic growth, investment and trade. All aspects considered, the evaluation assigns 15 out of 30 points to COMPETE's contribution to supporting sustainable capacities.

Sustainability dimension 2 – Contribution to supporting sustainable capacities – scores **15 out of 30 points**.

### **Sustainability – Dimension 3: Durability of results over time**

Here, an overall conclusion is expected to be drawn from the analysis of the first two dimensions under this evaluation criterion and a prediction reached as to the likelihood that the key stakeholders will continue to implement competition policy and promote freer trade in services. This is challenging, and the evaluation team certainly does not possess a crystal ball. On the one hand, the CLMV countries' commitment to ASEAN and relatively open markets will keep competition policy and trade in services on the agenda. On the other hand, the project produced few results, either by way of a competition policy practice or in trade in services. Competition policy, especially, rests on a fragile and weak basis, with limited political support – a politically induced change in leadership and staff within the competition authorities could quickly erode any gains made. The ultimate question is: to what extent will the CLMV countries embrace the competition policy and trade in

services agenda politically? As noted in section 4.2, some key informants have observed changes in the power dynamics in the CLMV countries as the middle class grows (INT DTG\_7; ITG\_4; OS\_4, 9). For now, however, it remains too early to tell what the impact of these demographic changes will be and whether they will induce more openness to market-economy thinking. Based on these considerations, the evaluation assigns 20 out of 50 points to the durability of results over time.

Sustainability dimension 3 – Durability of results over time – scores **20 out of 50 points**.

Photo 4: Wat Phnom, Phnom Penh – Taking the long view (© Geert Engelsmann, 2022)



## Methodology for assessing sustainability

Table 23: Methodology for assessing OECD/DAC criterion: sustainability

Sustainability: assessment dimensions	Basis for assessment	Evaluation design and empirical methods	Data quality and Limitations
<b>Capacities of the beneficiaries and stakeholders</b>	The extent to which the direct target group have the capacity, incentive, political support, authority, autonomy, willingness and tenacity to continue the work after GLZ's support ceases.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Key informant interviews</li> </ul> <p>The purpose, scope, and (dis-)advantages of the evaluation design and data collection methods are reflected on in section 3.2.</p>	Qualitative data were good, owing to the number and diversity of key informants.
<b>Contribution to supporting sustainable capacities</b>	Project's theory of change, including sustainability considerations and impact hypotheses.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Theory-based evaluation</li> <li>• Contribution analysis</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Key informant interviews</li> </ul>	Qualitative data were good, owing to the number and diversity of key informants.
<b>Durability of results over time</b>	Analysis of the first two dimensions under this evaluation criterion to come to a prediction as to the likelihood that the key stakeholders will continue to implement competition policy and promote trade in services.	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>• Qualitative enquiry</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>• Key informant interviews</li> </ul>	Qualitative data were good, owing to the number and diversity of key informants.



## 4.8 Key results and overall rating

COMPETE helped the competition authorities in the CLMV countries progress in implementing their mandate. The project team was knowledgeable about competition policy and ASEAN and, to its credit, mobilised recognised international and – importantly – national experts to support the competition authorities. The evaluation nevertheless rates the project as (moderately) unsuccessful in its development effectiveness – for five, partly interrelated, reasons:

- Despite years of support, dating back to COMPETE's predecessor projects, the institutional and policy frameworks underpinning the CLMV countries' competition laws remain incomplete, and the countries have yet to jumpstart a competition policy practice.
- The project insufficiently recognised the political nature of competition policy and did not mobilise political and policy dialogue to test and foster the countries' political commitment to competition policy and trade in services, or to help build a broad coalition in support of both agendas.
- While coherent in design with its sister ASEAN-region economic integration projects, COMPETE did not make the most of other projects, most notably the multi-donor, GIZ-implemented governance programme in Laos, to foster the implementation of competition policy and trade in services.
- The incomplete institutional and policy frameworks, the lack of checks and balances, and the fact that competition policy is implemented in authoritarian, one-party states with strong links between the political and economic elites put the progress that has been made and, therefore, the sustainability of COMPETE's results on a weak and fragile base.
- COMPETE has made little impact on the ASEAN trade in services agenda.

Photo 5: Dove of Peace, Sanderson Park, Phnom Penh (© Geert Engelsman, 2022)



Table 24: Overall rating of OECD/DAC criteria and assessment dimensions

Evaluation criteria	Dimension	Max.	Score	Total (max.100)	Rating
Relevance	Alignment with policies and priorities	30	15	60	Level 4: moderately unsuccessful
	Alignment with the needs and capacities of the beneficiaries and stakeholders	30	20		
	Appropriateness of the design*	20	10		
	Adaptability – response to change	20	15		
Coherence	Internal coherence	50	35	70	Level 3: moderately successful
	External coherence	50	35		
Effectiveness	Achievement of the (intended) objectives	30	15	55	Level 4: moderately unsuccessful
	Contribution to achievement of objectives	30	20		
	Quality of implementation	20	10		
	Unintended results	20	10		
Impact	Higher-level (intended) development changes/results	30	5	30	Level 5: unsuccessful
	Contribution to higher-level (intended) development results/changes	40	10		
	Contribution to higher-level (unintended) development results/changes	30	15		
Efficiency	Production efficiency	70	35	50	Level 4: moderately unsuccessful
	Allocation efficiency	30	15		
Sustainability	Capacities of the beneficiaries and stakeholders	20	10	45	Level 5: unsuccessful
	Contribution to supporting sustainable capacities	30	15		
	Durability of results over time	50	20		
Mean score and overall rating		100	52		Level 4: moderately unsuccessful

Table 25: Rating and score scales

100-point scale (score)	6-level scale (rating)
92–100	Level 1: highly successful
81–91	Level 2: successful
67–80	Level 3: moderately successful
50–66	Level 4: moderately unsuccessful
30–49	Level 5: unsuccessful
0–29	Level 6: highly unsuccessful
<p><u>Overall rating:</u> The criteria of effectiveness, impact and sustainability are knock-out criteria: if one of the criteria is rated at level 4 or lower, the overall rating cannot go beyond level 4, although the mean score may be higher.</p>	

## 5 Conclusions and recommendations

### 5.1 Key findings and factors of success/failure

Asia is expected to shape the 21<sup>st</sup> century economically and geopolitically. For Germany – as a net exporter and an advocate and a beneficiary of a rules-based international order – it is therefore key to have a foothold in Asia. ASEAN is seen as instrumental in this regard and Germany wants to raise its status from development to dialogue partner of ASEAN. Effective development cooperation is seen as one means to this end.

As Germany has a long history in supporting competition policy in ASEAN member states and competition policy enforcement will also be of benefit to German companies, because it ensures a level playing field, COMPETE makes sense in principle. This evaluation found, however, that the political commitment in the CLMV countries to implementing their competition laws is low. Competition authorities are understaffed and underfunded. Key elements of the requisite institutional and policy frameworks remain pending. A competition policy practice has yet to emerge.

In his reflections on the political economy of policy reform in Southeast Asia, the academic Hal Hill observed that successful policy reform in the region required a crisis, ideas and enablers (Hill, 2013). These elements were present directly after the 1997 Asian financial crisis. In the subsequent 10 years, the political leaders of ASEAN member states launched the Initiative for ASEAN Integration, instigated the ASEAN Economic Community and adopted the ASEAN Charter. From the start, the ASEAN Economic Community included competition policy and trade liberalisation. As the Asian financial crisis was overcome and the ASEAN member states prospered economically, the urgency of these initiatives subsided and momentum was lost.

The CLMV countries adopted competition laws in no small measure to fulfil, at least nominally, WTO and regional free-trade agreements, and the ASEAN Economic Community requirements. As Matt Andrews aptly summarised in his analysis of the limits of institutional reform in development, ‘reforms are often introduced as

“signals” to improve the short-term external perception of government effectiveness ... to gain legitimacy. The intention is to make government look better, not necessarily to make government better’ (Andrews, 2013). This evaluation suggests that this also applies to competition policy in the CLMV countries: they do not embrace the idea, and in the absence of a crisis or external obligations, there is no need to implement it (forcefully).

Cambodia is the final test case. As the last country to adopt a competition law in 2021 (after years of dithering), there is now some momentum in developing the institutional and policy frameworks to implement the law. The next two to three years will show whether the government is serious, will enforce the law and start building an effective competition policy practice.

The latest developments in Cambodia notwithstanding, the above findings raise the question whether supporting competition policy is the best means to serve Germany’s ends, namely to gain a stronger geopolitical and economic foothold in ASEAN. Perhaps there are other fields of development cooperation, more pertinent to ASEAN, where Germany in general and GIZ in particular have expertise and can be both more relevant and effective, both for Germany’s own sake and from a development effectiveness point of view.

The story on trade in services is both different and the same. Whereas the CLMV countries do not care too much about competition, they have embraced foreign direct investment and trade to spur economic growth. Consequently, they have entered regional free-trade agreements. While focusing on trade in goods, these also encompass trade in services, with ASEAN gradually opening up trade in services. Still, the CLMV countries’ governments are proceeding slowly, wary of endangering their domestic services market, their control over the economy and their hold on power. The ASEAN Trade in Services Agreement will only take effect in 2029 in Viet Nam and 2035 in the CLM countries. Important here is that GIZ’s support was barely required or accepted – partly because other external support was in place and partly because the CLMV countries did not want to put their (negotiation) cards on the table. The result is therefore the same, questioning whether support for trade in services is the best means for Germany to achieve its ends.

The key instrument in supporting the competition authorities in the CLMV countries was external expertise on competition policy. A positive aspect of COMPETE was that it mobilised recognised experts, both international and – importantly – national. This support was highly appreciated by the competition authorities, as it exposed them to state-of-the-art knowledge and expanded their (national) networks. A key premise of COMPETE was, however, to put the CLMV countries in the lead. In practice, GIZ led the process and the experts provided the bulk of the substance.

This leads to the – seemingly contradictory – conclusion that while progress was too slow (see above), the work-floor support to the competition authorities in the CLMV countries moved too fast: the competition authorities did not have the time, within their available resources, to lead the operationalisation of the ACAP and national competition laws, and thus learn by doing. From a capacity development perspective, COMPETE might have done better by working more with ‘peers’ rather than ‘consultants’. The difference is that ‘peers’ can coach/mentor, but do not have the time, nor the remuneration, to do the work for the competition authorities. By consequence, this forces the competition authorities to take the lead. (This insight should not be seen in black and white. Even the German competition authority uses external expertise when it needs highly specialised knowledge that is not required on a continuous basis and for which, therefore, it does not need its own staff.)

## **Findings regarding 2030 Agenda**

### **Universality, shared responsibility and accountability**

Of the three dimensions of sustainable development, COMPETE was principally geared towards the economic dimension. By supporting competition policy and free trade in services, the project wanted to foster economic growth, improve incomes and reduce poverty – albeit indirectly. In this regard, the project was geared towards SDGs 8.1 (economic growth) and 8.3 (entrepreneurship and employment). Through its focus on implementing

the national competition laws and seeking harmonisation between competition policy practices within ASEAN, it also sought to contribute to SDGs 16.3 (rule of law) and 16.8 (global governance). With progress slow, the absence of an actual competition policy practice in the CLMV countries, and little substantive contribution to the trade in services agenda, it is fair to say that, for now, the actual contribution to the attainment of the SDGs lies, at best, in the future.

### **Interplay of economic, environmental and social development**

By ensuring a level playing field for businesses and fostering consumers' access to cheaper and high-quality products, the project could, in principle (when successful), contribute positively to social development. The project was environmentally agnostic. It places the environment outside the project's system boundary, while noting that neither competition policy nor trade in services, in and of itself, poses any environmental risks (GIZ, 2018c).

### **Inclusiveness/leave no one behind**

COMPETE did not feature targeted interventions to include marginalised groups or entrepreneurs/workers losing out as a result of the liberalisation of trade. Instead, it operated at the macroeconomic and national government level, seeking policies that, in an open-market economy, are meant to benefit most of the population.

### **Findings regarding the follow-on project**

By and large, the follow-on project (COMPETE II) is a continuation of COMPETE and based on pretty much the same problem analysis. It aims to support the implementation of the ACAP and strengthen the capacities of the competition authorities. While it also seeks to strengthen the competition authority's collaboration with other public and private sector institutions as a means of gaining social acceptance and reputation, this workstream does not envisage political dialogue and political coalition-building to strengthen buy-in to the implementation of competition policy (GIZ, 2022h). By continuing COMPETE's purely technical approach, the follow-on project runs the same risk of not attaining its envisaged development impacts. Despite this, the follow-on project differs on an important point, namely gender.

COMPETE intended to be gender-responsive in strengthening the staff development plans and systems of the competent ministries for competition policy and trade in services (GIZ, 2018c). In practice, the project only worked with the 'departments' of competition policy and trade within these ministries and not with the central unit responsible for human resource development. COMPETE could therefore not support (or influence) the ministry-wide staff development systems on this front.

The follow-on project has a dedicated workstream to work with the gender focal points in the respective ministries and actively include competition policy and trade in the (implementation of the) gender mainstreaming plans of the ministries (GIZ, 2022h). This could take the form of ensuring equal female representation on staff, management teams and competition commissions, and prioritising, in the implementation of the competition policy, sectors with a large impact on women (e.g. online retail) (INT\_OS 11). In addition, the follow-on project intends to build on the global initiative of the OECD investigating how gender equity can contribute to the implementation of national competition laws. The project team's initiative to have a dedicated workstream on gender sits well with BMZ's ambition for 90 per cent of projects to have a gender marker (GIZ, 2022h).

Finally, like COMPETE, the outcome indicators of the follow-on project are output-oriented; they do not capture the emergence of a competition policy practice or the removal of trade in services barriers (GIZ, 2022h).



## 5.2 Recommendations

The findings in the opening paragraphs of this chapter lead to the following recommendations.

- Given the CLMV countries' limited political commitment to, and progress on, implementing their competition laws and considering the BMZ 2030 Reform Strategy's call for 'reform partnerships [wherein] our partner countries can and must deliver more', we recommend stopping COMPETE II and redirecting resources to other collaborations with ASEAN where there is greater reform-mindedness and political commitment to promoting sustainable development.
- If COMPETE II is discontinued, then the only exception that could be made is to continue supporting Cambodia on its implementation of its competition law for another three years on a bilateral basis to help it translate the current momentum in operationalising its competition law into an actual competition policy practice.
- If COMPETE II is continued, then the recommendations would be to:
  - insert a dedicated workstream into the project focused on fostering political and policy dialogue around the merits and importance of competition policy, making use of both Germany's political representation and ongoing governance programmes being implemented by GIZ in the countries, in order to help build a broad coalition in the countries in favour of an active and effective competition policy practice,
  - shift from a mainly consultancy-driven to a largely peer-support approach, leaving the lead for making progress squarely in the hands of the competition authorities, but empowering them by exposing them to peers from countries with more advanced competition policy practices and with experience in overcoming the barriers faced by the competition authorities in the CLV countries<sup>15</sup>,
  - redefine COMPETE II's outcome indicators to capture actual outcomes rather than outputs. On competition policy, this would involve, for example, a quantitative and qualitative assessment of the number and type of competition cases that are investigated and adjudicated by the national competition commissions<sup>16</sup>, and
  - gear support towards the actual, on-the-ground enforcement of the competition laws (even when focused on just one of the three main components of competition policy: anti-competitive agreements, abuse of dominance, mergers and acquisitions) and thus work towards building an actual competition policy practice.

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<sup>15</sup> Peer support is, in effect, what the Australian Competition and Consumer Commission offers Cambodia through its CLIP programme. COMPETE can expand on this by also mobilising peers from China, Indonesia, Thailand and the Philippines, for example, and/or by focusing its peer support on Laos and Viet Nam. GIZ could also consider setting up a peer-support programme for ASEAN as a whole, which may be more in line with its own objective to become a dialogue partner of ASEAN.

<sup>16</sup> The competition perception index, which is currently being developed with support from COMPETE, could complement this nicely.

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## Annex: Evaluation matrix

<b>OECD-DAC Criterion Relevance - Is the intervention doing the right things? (max. 100 points)</b> The 'relevance' criterion focuses on the intervention's design. It refers to the extent to which the objectives and design of a development intervention are consistent with the (global, country and institution-specific) requirements, needs, priorities and policies of beneficiaries and stakeholders (individuals, groups, organisations and development partners). It also identifies the ability of the intervention's design to adapt to a change in circumstances. "Relevance" is assessed in relation to 1) the <b>time of the intervention design</b> <sup>1</sup> and 2) from <b>today's perspective</b> <sup>2</sup> .								
Assessment dimensions	Filter - Project Type	Evaluation questions	Clarifications	Basis for Assessment / Evaluation Indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)
Alignment with policies and priorities	Standard	To what extent are the intervention's objectives aligned with the (global, regional and country specific) policies and priorities of the BMZ and of the beneficiaries and stakeholders and other (development) partners? To what extent do they take account of the relevant political and institutional environment?	<ul style="list-style-type: none"> <li>• Orientation at BMZ country strategies and BMZ sector concepts</li> <li>• Strategic reference framework for the project (e.g. national strategies including the national implementation strategy for Agenda 2030, regional and international strategies, sectoral and cross-sectoral change strategies, in bilateral projects especially partner strategies, internal analytical framework e.g. safeguards and gender<sup>4</sup>)</li> <li>• Orientation of the project design at the (national) objectives of Agenda 2030</li> <li>• Project contribution to certain Sustainable Development Goals (SDGs)</li> <li>• Explanation of a hierarchy of the different policies, priorities (especially in case of contradictions)</li> </ul>	<b>ASEAN</b> <ul style="list-style-type: none"> <li>• ASEAN Charter</li> <li>• AEC Blueprint 2025</li> <li>• ACAP</li> <li>• ATISA</li> </ul> <b>CLMV countries</b> <ul style="list-style-type: none"> <li>• National development, competition, and trade plans and strategies</li> <li>• Competition laws</li> </ul> <b>Germany</b> <ul style="list-style-type: none"> <li>• Leitlinien zu Indo-Pazifik</li> <li>• Neue ASIEN Politik der BMZ</li> <li>• BMZ 2030 Reform</li> </ul>	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	<b>Project</b> BMZ Offer Progress reports <b>ASEAN</b> <ul style="list-style-type: none"> <li>• ASEAN Charter</li> <li>• AEC Blueprint 2025</li> <li>• ACAP</li> <li>• ATISA</li> </ul> <b>CLMV countries</b> <ul style="list-style-type: none"> <li>• National development, competition, and trade plans and strategies</li> <li>• Competition laws</li> </ul> <b>Germany</b> <ul style="list-style-type: none"> <li>• Leitlinien zu Indo-Pazifik</li> <li>• Neue ASIEN Politik der BMZ</li> <li>• BMZ 2030 Reform</li> </ul>	The objectives and priorities of ASEAN, the CLMV countries, and Germany are (expected to be) well-defined and documented. The evaluation will assess whether a difference exists between stated objectives and lived experience. The quality of data is expected to be good.	good
	and Fragility	To what extent was the (conflict) context of the project adequately analysed and considered for the project concept?	<ul style="list-style-type: none"> <li>• Key documents: (Integrated) Peace and Conflict Assessment (I)PCA, Safeguard Conflict and Context Sensitivity documents</li> </ul>	Extent to which the project proved sensitive to the political (conflict) context.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	<b>Documents</b> BMZ Offer Economist Intelligence Unit Country Reports Political economy analysis of ASEAN  <b>Key informants' interviews (see Chapter 2 and 3 in Inception / Evaluation Report for specification)</b> Direct target group Indirect target group Project steering committee members Others stakeholders	The quality of data is expected to be good due to number and diversity of data sources. Note: As a regional project, COMPETE was not obliged to, and did not conduct, an ex-ante Peace and Conflict Assessment.	good
	and SV/GV	To what extent does the project complement bilateral or regional projects? To what	<ul style="list-style-type: none"> <li>• Please use CPE factsheet on SV / GV / IZR</li> </ul>					



		extent does it complement other global projects?						
	and SV/GV	To what extent is the project geared towards solving a global challenge that cannot only be effectively addressed bilaterally/ regionally?	• Please use CPE factsheet on SV / GV / IZR					
<b>Alignment with the needs and capacities of the beneficiaries and stakeholders</b>	Standard	To what extent are the intervention's objectives aligned with the development needs and capacities of the beneficiaries and stakeholders involved (individuals, groups and organisations)?	• Also: consideration of stakeholders such as civil society and private sector in the design of the measure	Extent to which the direct target group (see also next subsection on target group analysis) have expressed a qualified demand for support.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	<b>Key informants interview</b> <ul style="list-style-type: none"> <li>Direct target group</li> <li>Indirect target group</li> <li>Project steering committee members</li> <li>Others stakeholders</li> </ul>	The evaluation can engage directly with the direct target groups and with representatives from the indirect target group (namely business and consumer associations) and inquire after their qualified demand for support. The evaluation will triangulate these findings with the perceptions of other stakeholders (the project team, experts, development partners) The quality of data is expected to be good.	good
	and Fragility	How were deescalating factors/ connectors as well as escalating factors/ dividers in the project context identified and considered for the project concept (please list the factors)?	• e.g. see column I and II of the (Integrated) Peace and Conflict Assessment	The extent to which escalating factors / dividers and deescalating factors / connectors have been identified and weakened / strengthened	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	<b>Documents</b> <ul style="list-style-type: none"> <li>BMZ Offer</li> <li>Progress reports</li> </ul> <b>Key informants interviews</b> <ul style="list-style-type: none"> <li>Direct target group</li> <li>Indirect target group</li> <li>Project steering committee members</li> <li>Other stakeholders</li> </ul>	The quality of data is expected to be good due to number and diversity of data sources. Note: As a regional project, COMPETE was not obliged to, and did not conduct, an ex-ante Peace and Conflict Assessment.	good
	and Fragility	To what extent were potential (security) risks for (GIZ) staff, partners, target groups/final beneficiaries identified and considered?		The extent to which a security risks have been considered and, where needed, acted upon..	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Key informant interviews</li> </ul>	<b>Key informant interviews</b> <ul style="list-style-type: none"> <li>Project team leader</li> <li>Regional and country RMOs</li> </ul>	Security briefing during inception phase qualified Cambodia, Laos and Viet Nam as stable and low risk countries. The project operates in the capitals. Project activities have stopped in Myanmar. The local project officer in Myanmar works from home. Evaluation expects security risks to feature low on the project team's list of priorities.	good
	Standard	To what extent are the intervention's objectives geared to the needs and capacities of particularly disadvantaged and vulnerable beneficiaries and stakeholders (individuals, groups and organisations)? With respect to groups, a differentiation can be made by age, income, gender, ethnicity, etc. ?	<ul style="list-style-type: none"> <li>• Reaching particularly disadvantaged groups (in terms of Leave No One Behind, LNOB)</li> <li>• Consideration of potential for human rights and gender aspects</li> <li>• Consideration of identified risks</li> </ul>	Geographic and target group focus of the project	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>• Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>• Document review</li> <li>• Key informant interviews</li> </ul>	<b>Documents</b> <ul style="list-style-type: none"> <li>BMZ Offer</li> </ul> <b>Key informants interviews</b> <ul style="list-style-type: none"> <li>Direct target group</li> <li>Indirect target group</li> <li>Project steering committee members</li> <li>Others stakeholders</li> </ul>	Data is expected to be limited as the project did not focus on disadvantaged groups. Instead, it tried to create a level playing field for all businesses, including SMEs.	moderate

Appropriateness of the design <sup>3</sup>	Standard	To what extent is the intervention's design appropriate and realistic (in terms of technical, organisational and financial aspects)?	<ul style="list-style-type: none"> <li>Realistic project goal from today's perspective and in view of the available resources (time, finances, partner capacities)</li> <li>Consideration of potential changes in the framework conditions</li> <li>Dealing with the complexity of framework conditions and strategic reference frameworks and with possible overloading</li> <li>Strategic focusing</li> </ul>	<p>Has a detailed Theory of Change been developed? Does the Theory of Change detail how GIZ' support is expected to result in the envisaged outcomes and impacts?</p> <p>Who are GIZ' boundary partners and how are they likely to respond to GIZ' support?</p> <p>How did GIZ' boundary partners influence other stakeholders - what was the envisaged ripple effect?</p> <p>Have potential internal / external influences / risks been factored in?</p> <p>Was the Theory of Change plausible (realistic), verifiable and uncontested?</p>	<p><b>Evaluation design:</b> Theory-based evaluation</p> <p><b>Empirical methods:</b> Document review Key informant interviews Literature review</p>	<p><b>Documents</b> BMZ Offer Results matrix / model</p> <p><b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Others stakeholders</p> <p><b>Literature:</b> Development, political economy analysis, competition policy and trade literature, general and ASEAN specific</p>	The BMZ offer, the Results Matrix and the project team offered detailed information on the project's Theory of Change. The quality of the collected data is expected to be good due to number and diversity of key informants.	good
	Standard	To what extent is the intervention's design sufficiently precise and plausible (in terms of the verifiability und traceability of the system of objectives and the underlying assumptions)?	<p>Assessment of the (current) results model and results hypotheses (Theory of Change, ToC) of the actual project logic:</p> <ul style="list-style-type: none"> <li>Adequacy of activities, instruments and outputs in relation to the project objective to be achieved</li> <li>Plausibility of the underlying results hypotheses</li> <li>Clear definition and plausibility of the selected system boundary (sphere of responsibility)</li> <li>Appropriate consideration of potential influences of other donors/ organisations outside the project's sphere of responsibility</li> <li>completeness and plausibility of assumptions and risks for the project results</li> <li>How well is co-financing (if any) integrated into the overall concept of the project and what added value could be generated for the ToC/project design?</li> </ul>	same as above	same as above	same as above	same as above	good
	Standard	To what extent is the intervention's design based on a holistic approach to sustainable development (interaction of the social, environmental and economic dimensions of sustainability)?	<ul style="list-style-type: none"> <li>Presentation of the interactions (synergies/trade-offs) of the intervention with other sectors in the project design - also with regard to the sustainability dimensions in terms of Agenda 2030 (economic, ecological and social development)</li> </ul>	The extent to which the project addresses the social, ecological and economic dimensions of sustainable development	Same as above	Same as above	COMPETE focusses on economic development with limited to no direct affects on the social and environmental dimensions of sustainable development--see Chapter 2.2 of Inception Report.	good

	<b>Adaptability – response to change</b>	Standard	To what extent has the intervention responded to changes in the environment over time (risks and potentials)?	<ul style="list-style-type: none"><li>• Reaction to changes during project including change offers (e.g. local, national, international, sectoral changes, including state-of-the-art sectoral know-how)</li></ul>	Identification of main changes in the context and the extent to which the project responded to these changes.	<b>Evaluation design:</b> <ul style="list-style-type: none"><li>• Theory-based evaluation</li></ul> <b>Empirical methods:</b> <ul style="list-style-type: none"><li>• Document review</li><li>• Key informant interviews</li></ul>	<b>Documents</b> BMZ Offer Progress reports  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Others stakeholders	The main changes have been articulated in the two change offers. These can be reflected on with the direct and indirect target groups. The quality of data is expected to be good due to the number and diversity of key informants.	good

(1) The 'time of the intervention design' is the point in time when the offer/most recent modification offer was approved.
(2) In relation to the current standards, knowledge and framework conditions.
(3) The design of an intervention is usually assessed by evaluating its intervention logic. The intervention logic depicts the system of objectives used by an intervention. It maps out the systematic relationships between the individual results levels. At the time an intervention is designed, the intervention logic, in the form of a logical model, is described in the offer for the intervention both as a narrative and generally also on the basis of a results framework. The model is reviewed at the start of an evaluation and adjusted to reflect current knowledge. Comprehensive (re)constructed intervention logics are also known as "theories of change". In GIZ the 'project design' encompasses project objective (outcome) and the respective theory of change (ToC) with outputs, activities, TC-instruments and especially the results hypotheses as well as the implementation strategy (e.g. methodological approach, Capacity Development (CD) strategy). In GIZ the Theory of Change is described by the GIZ results model as graphic illustration and the narrative results hypotheses.
(4) In the GIZ Safeguards and Gender system risks are assessed before project start regarding following aspects: gender, conflict, human rights, environment and climate. For the topics gender and human rights not only risks but also potentials are assessed. Before introducing the new safeguard system in 2016 GIZ used to examine these aspects in separate checks.
(5) Deescalating factors/ connectors: e.g. peace-promoting actors and institutions, structural changes, peace-promoting norms and behavior. For more details on 'connectors' see: GIZ (2007): 'Peace and Conflict Assessment (PCA). Ein methodischer Rahmen zur konflikt- und friedensbezogenen Ausrichtung von EZ-Maßnahmen', p. 55/135.
(6) Escalating factors/ dividers: e.g. destructive institutions, structures, norms and behavior. For more details on 'dividers' see: GIZ (2007): 'Peace and Conflict Assessment (PCA). Ein methodischer Rahmen zur konflikt- und friedensbezogenen Ausrichtung von EZ-Maßnahmen', p. 135.
(7) All projects in fragile contexts, projects with FS1 or FS2 markers and all transitional aid projects have to weaken escalating factors/dividers and have to mitigate risks in the context of conflict, fragility and violence. Projects with FS1 or FS2 markers should also consider how to strengthen deescalating factors/ connectors and how to address peace needs in its project objective/sub-objective.

**OECD-DAC Criterion Coherence - How well does the intervention fit? (max. 100 points)**

This criterion refers to the intervention's compatibility with other interventions in a country, sector or institution as well as with international norms and standards. **Internal coherence** addresses the synergies and division of tasks between the intervention and other interventions of German development cooperation and also the intervention's consistency with the relevant international norms and standards to which German development cooperation adheres. **External coherence** considers the intervention's complementarity, harmonisation and coordination with the interventions of other partners, donors and international organisations. The "coherence" criterion relates both to the intervention's design as well as to the results it achieves.

Assessment dimensions	Filter - Project Type	Evaluation questions	Clarifications	Basis for Assessment / Evaluation indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)
Internal coherence	Standard	Within German development cooperation, to what extent is the intervention designed and implemented (in a sector, country, region or globally) in a complementary manner, based on the division of tasks?	• Also analysis of whether the project takes the necessary steps to fully realize synergies within German development cooperation	The extent to which the project deliberately complements other BMZ-funded, GIZ-implemented development cooperation interventions and thereby (i) achieves greater development outcomes and impacts than these interventions could achieve on their own; and / or (ii) realizes efficiency gains, i.e., the development results are achieved with less resources than would otherwise be needed.	<b>Evaluation design:</b> Direct enquiry  <b>Empirical methods:</b> Document review Key informant interviews Focus group discussions	<b>Documents</b> BMZ Offers Progress reports  <b>Key informants' interviews (see Chapter 2 and 3 in Inception / Evaluation Report for specification)</b> GIZ project team leaders BMZ representatives in-country Direct target groups	The purpose and scope of the 'family' of GIZ-implemented ASEAN projects are well-documented. Actual complementarity and synergies will be deduced from discussions with the respective project teams and direct target groups. Data is expected to be good due to the number and diversity of key informants.	good
	Standard	To what extent are the instruments of German development cooperation (Technical and Financial Cooperation) meaningfully interlinked within the intervention (in terms of both design and implementation)? Are synergies leveraged?	• if applicable, also take into account projects of different German ressorts/ministries	Same as above	Same as above	Same as above	Same as above	good
	Standard	To what extent is the intervention consistent with international and national norms and standards to which German development cooperation is committed (e.g. human rights)?		The extent to which the project complies with: LNOB, human rights, gender equity and conflict sensitive program management.	Same as above	same as above	Data on the project's adherence to international norms is expected to be limited as the project did not target, focus, or did not need to apply these norms. This is except for gender equity. This is discussed in Chapter 4.8 (follow-on project).	moderate
External coherence	Standard	To what extent does the intervention complement and support the partner's own efforts (principle of subsidiarity)?		The extent to which the project places itself at the service of the local reform efforts by, and deliberately complements the efforts and capacities of, local reform actors.	<b>Evaluation design:</b> • Direct enquiry  <b>Empirical methods:</b> • Document review • Key informant interviews	<b>Documents</b> BMZ Offers Progress reports  <b>Key informants' interviews</b> GIZ project team leaders BMZ representatives in-country Direct target groups Indirect target groups Project steering committee members Other stakeholders	Data is expected to be good due to direct enquiry with full direct target group.	good

	Standard	To what extent has the intervention's design and implementation been coordinated with other donors' activities?	<ul style="list-style-type: none"> <li>Also: To what extent could synergies be achieved through co-financing (where available) with other bilateral and multilateral donors and organizations and how did co-financing contribute to improved donor coordination?</li> </ul>	The extent to which the project deliberately complements international development partner interventions and thereby (i) achieves greater development outcomes and impacts than these interventions could achieve on their own; and / or (ii) realizes efficiency gains, i.e., the development results are achieved with less resources than would otherwise be needed.	<b>Evaluation design:</b> <ul style="list-style-type: none"> <li>Direct enquiry</li> </ul> <b>Empirical methods:</b> <ul style="list-style-type: none"> <li>Key informant interviews</li> </ul>	<b>Key informants interview</b> Direct target groups Indirect target groups Project steering committee members Other stakeholders	See Section 2.1. Multiple international organizations and development partners active. COMPETE cooperates with different levels of intensity with a handful. Evaluation team will inquire after the coherence with direct and indirect target groups and other stakeholders. Data is expected to be good due to the number and diversity of key informants.	good
	Standard	To what extent has the intervention's design been designed to use existing systems and structures (of partners/other donors/international organisations) for implementing its activities? To what extent are these systems and structures used?	<ul style="list-style-type: none"> <li>Also analysis of whether the project is taking the necessary steps to fully realize synergies with interventions of other donors at the impact level</li> </ul>	The extent to which the project uses existing government or development partner systems and structures in project implementation	Same as above	Same as above	Data is expected to be good due to direct enquiry with the full direct target group and the most active development partners.	good
	Standard	To what extent are common systems (together with partners/other donors/international organisations) used for M&E, learning and accountability?		The extent to which the project uses existing government or development partner systems and structures in M&E, learning and accountability	Same as above	Same as above	Same as above	good

**OECD-DAC Criterion Effectiveness - Is the intervention achieving its objectives? (max. 100 points)**

'Effectiveness' refers to the extent to which the intervention has achieved, or is expected to achieve, its objectives (at outcome level), including any differential results across beneficiary and stakeholder groups. It examines the achievement of objectives in terms of the direct, short-term and medium term results.

Assessment dimensions	Filter - Project Type	Evaluation questions	Clarifications	Basis for Assessment / Evaluation indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)
<b>Achievement of the (intended) objectives<sup>1</sup></b>	Standard	To what extent has the intervention achieved, or is the intervention expected to achieve, the (intended) objectives as originally planned (or as modified to cater for changes in the environment)?	<ul style="list-style-type: none"> <li>Assessment based on the project objective indicators (agreed with BMZ)</li> <li>Check whether more specific or additional indicators are needed to adequately reflect the project objective</li> </ul>	<p>The extent to which COMPETE met the target values of its three outcome indicators</p> <p>The extent to which competition policy is practiced and trade barriers on services are being reduced as indicated qualitatively by key informants and measured through:</p> <ul style="list-style-type: none"> <li>the number and art of competition cases investigated by the competent ministries / competition authorities and the number and volume of any fines imposed,</li> <li>the number and art of (non) tariff barriers removed to facilitate the trade in services.</li> </ul>	<p><b>Evaluation design:</b> Direct enquiry</p> <p><b>Empirical methods:</b> Document review Key informant interviews Quantitative data collection Focus group discussions</p>	<p><b>Documents</b> Project completion report</p> <p><b>Key informants' interviews (see Chapter 2 and 3 in Inception / Evaluation Report for specification)</b> Direct target group Indirect target group Project steering committee members</p> <p><b>Quantitative data</b> Information from direct target group</p>	<p>Qualitative data is expected to be good due to the number and diversity of key informants.</p> <p>Quantitative data on actual competition policy practice and reduction of trade barriers is expected to be limited and inconsistent in type and quality across the countries.</p>	good
	and Fragility	For projects with FS1 or FS2 markers: To what extent was the project able to strengthen deescalating factors/ connectors? <sup>2,4</sup>		Extent to which COMPETE was able to foster a rules-based international order, a harmonization of competition policy and law, and market integration	<p><b>Evaluation design:</b> Direct enquiry</p> <p><b>Empirical methods:</b> Key informant interviews</p>	<p><b>Key informants interview</b> Direct target group Indirect target group Project steering committee members Other stakeholders</p>	<p>Qualitative data is expected to be good due to the number and diversity of key informants.</p>	good
<b>Contribution to achievement of objectives</b>	Standard	To what extent have the intervention's outputs been delivered as originally planned (or as modified to cater for changes in the environment)?		Overview of COMPETE's (contribution to) outputs and outcomes--see Section 4.5 of inception/evaluation report 'achievement of outputs and outcomes	<p><b>Evaluation design:</b> Direct enquiry</p> <p><b>Empirical methods:</b> Document review Key informant interviews Quantitative data collection Focus group discussions</p>	<p><b>Documents</b> Project completion report Last updated results matrix</p> <p><b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders</p>	<p>Project results are reported according to GIZ standard. Qualitative data is expected to be good due to the number and diversity of key informants.</p>	good

	Standard	To what extent have the delivered outputs and increased capacities been used and equal access (e.g. in terms of physical, non-discriminatory and affordable access) guaranteed?		The extent to which competition policy is practiced and trade barriers on services are being reduced as indicated qualitatively by key informants and measured through: <ul style="list-style-type: none"> <li>• the number and art of competition cases investigated by the competent ministries / competition authorities and the number and volume of any fines imposed,</li> <li>• the number and art of (non) tariff barriers removed to facilitate the trade in services.</li> </ul>	<b>Evaluation design:</b> Direct enquiry  <b>Empirical methods:</b> Key informant interviews Quantitative data collection Focus group discussions	<b>Key informants interview</b> Direct target group Indirect target group Project steering committee members Other stakeholders  <b>Quantitative data</b> Information from direct target group	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	Standard	To what extent has the intervention contributed to the achievement of objectives?	<ul style="list-style-type: none"> <li>• Assessment based on the activities, TC-instruments and outputs of the project (contribution-analysis as focus of this assessment dimension and minimum standard, see annotated reports)</li> <li>• What would have happened without the project? (usually qualitative reflection)</li> </ul>	The project's theory of change, including results hypotheses	<b>Evaluation design:</b> Theory-based evaluation Direct enquiry Contribution analysis  <b>Evaluation methods:</b> Document review Literature review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders  <b>Quantitative data</b> Information from direct target group	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	Standard	To what extent has the intervention contributed to the achievement of objectives at the level of the intended beneficiaries?		Same as above, plus see impact	Same as above, plus see impact	Same as above, plus see impact	Same as above, plus see impact	good
	Standard	To what extent has the intervention contributed to the achievement of objectives at the level of particularly disadvantaged or vulnerable groups of beneficiaries and stakeholders? (These may be broken down by age, income, gender, ethnicity, etc.)?		Not applicable: the project operates at the national level for the indiscriminate benefit of all businesses and consumers.	Not applicable	Not applicable	Not applicable	
	Standard	Which internal factors (technical, organisational or financial) were decisive for achievement/non-achievement of the intervention's intended objectives?	<ul style="list-style-type: none"> <li>• Internal factors = within the project's sphere of responsibility / system boundary. The project is implemented jointly by GIZ and the official partner(s).</li> </ul>	The project's theory of change, including results hypotheses	<b>Evaluation design:</b> Theory-based evaluation Direct enquiry Contribution analysis  <b>Evaluation methods:</b> Document review Literature review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good



						Quantitative data Information from direct target group		
	Standard	Which external factors were decisive for achievement/non-achievement of the intervention's intended objectives (taking into account the anticipated risks)?	• External factors = outside the project's sphere of responsibility / system boundary. The project is implemented jointly by GLZ and the official partner(s).	Same as above	Same as above	Same as above	Same as above	good
Quality of implementation	Standard	<p>What assessment can be made of the quality of steering and implementation of the intervention in terms of the achievement of objectives?</p> <p>What assessment can be made of the quality of steering and implementation of, and participation in, the intervention by the partner/executing agency?</p>	<p>Capacity Works considerations:</p> <ul style="list-style-type: none"> <li>- <b>Results-oriented monitoring (RoM / WoM)</b> is established and used, e.g. for evidence-based decisions, risk management. Data are disaggregated by gender and marginalized groups. unintended positive and negative results are monitored. Conflict-sensitive monitoring and explicit risk-safety monitoring are particularly important for projects in fragile contexts.</li> <li>- A bindingly communicated <b>strategy</b> agreed with the partners is pursued</li> <li>- Involvement and <b>cooperation</b> of all relevant actors (including partners, civil society, private sector)</li> <li>- <b>Steering:</b> decisions influencing the projects' results are made in time and evidence-informed. Decision processes are transparent.</li> <li>- <b>Processes:</b> Relevant change processes are anchored in the cooperation system; project-internal processes are established and regularly reflected and optimised.</li> <li>- <b>Learning and innovation:</b> There is a learning and innovation-friendly work culture that promotes the exchange of experience; learning processes are established; context-specific adjustments are possible</li> </ul>	<p>The extent to which the project team actively and effectively steered on the achievement of the project objectives, including through:</p> <ul style="list-style-type: none"> <li>• regular context and results analysis,</li> <li>• timely responding to project and context developments,</li> <li>• making use of synergies with other interventions,</li> <li>• using the M&amp;E system, and</li> <li>• involving all stakeholders.</li> </ul>	<p><b>Evaluation design:</b> Direct enquiry</p> <p><b>Empirical methods:</b> Document review Key informant interviews</p>	<p><b>Documents</b> BMZ Offer Progress reports Project completion report</p> <p><b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members</p>	Qualitative data is expected to be good due to the number and diversity of key informants.	good

Unintended results	Standard	To what extent can unintended positive/negative direct results (social, economic, environmental and among vulnerable beneficiary groups) be observed/anticipated?	• The focus is on the outcome level, but for the analysis the unintended effects can also be included on the output level	Open enquiry among all key informants to the evaluation into the (unintended) outcomes of the project, the benefits and risks emanating from them, and how the project responded to them.	<b>Evaluation design:</b> Direct enquiry  <b>Empirical methods:</b> Document review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	and Fragility	To what extent was the project able to ensure that escalating factors/ dividers <sup>3</sup> have not been strengthened (indirectly) by the project <sup>4</sup> ? Has the project unintentionally (indirectly) supported violent or 'dividing' actors?		Same as above	Same as above	Same as above	Same as above	good
	Standard	What potential benefits/risks arise from the positive/negative unintended results? What assessment can be made of them?	• also check whether the risks were already mentioned and monitored in the design phase	Same as above	Same as above	Same as above	Same as above	good
	and Fragility	To what extent have risks and unintended-negative results in the context of conflict, fragility and violence <sup>5</sup> been monitored (context/conflict-sensitive monitoring) in a systematic way?		See above under quality of implementation	See above under quality of implementation	See above under quality of implementation	See above under quality of implementation	good
	Standard	How has the intervention responded to the potential benefits/risks of the positive/negative unintended results?	• Check if positive results at the outcome level have been monitored and set in value	Same as above	Same as above	Same as above	Same as above	good

(1) The first and second assessment dimensions are interrelated: If the project's contribution to achieving the objective is small (2nd assessment dimension), this must also be taken into account when evaluating the first assessment dimension.

(2) Deescalating factors/ connectors: e.g. peace-promoting actors and institutions, structural changes, peace-promoting norms and behavior. For more details on 'connectors' see: GIZ (2007): 'Peace and Conflict Assessment (PCA). Ein methodischer Rahmen zur konflikt- und friedensbezogenen Ausrichtung von EZ-Maßnahmen', p. 55/135.

(3) Escalating factors/ dividers: e.g. destructive institutions, structures, norms and behavior. For more details on 'dividers' see: GIZ (2007): 'Peace and Conflict Assessment (PCA). Ein methodischer Rahmen zur konflikt- und friedensbezogenen Ausrichtung von EZ-Maßnahmen', p. 135.

(4) All projects in fragile contexts, projects with FS1 or FS2 markers and all transitional aid projects have to weaken escalating factors/dividers and have to mitigate risks in the context of conflict, fragility and violence. Projects with FS1 or FS2 markers should also consider how to strengthen deescalating factors/ connectors and how to address peace needs in its project objective/sub-objective?

(5) Risks in the context of conflict, fragility and violence: e.g. contextual (e.g. political instability, violence, economic crises, migration/refugee flows, drought, etc.), institutional (e.g. weak partner capacity, fiduciary risks, corruption, staff turnover, investment risks) and personnel (murder, robbery, kidnapping, medical care, etc.). For more details see: GIZ (2014): 'Context- and conflict-sensitive results-based monitoring system (RBM). Supplement to: The 'Guidelines on designing and using a results-based monitoring system (RBM) system.', p.27 and 28.

**OECD-DAC Criterion Impact (higher-level development results) - What difference does the intervention make? (max. 100 points)**

Based on recognisable higher-level development changes (at impact level), the criterion of "higher level development results (at impact level)" relates to the extent to which the intervention has already produced significant positive or negative, intended or unintended results at the overarching level (contributions to the observed changes), or is expected to do so in the future. This includes any differential results across different stakeholders and beneficiaries. This criterion refers to the results of the development intervention.

Assessment dimension	Filter - Project Type	Evaluation questions	Clarifications	Basis for Assessment / Evaluation indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)
Higher-level (intended) development changes <sup>1</sup>	Standard	To what extent can the higher-level development changes (social, economic and environmental dimensions and the interactions between them) to which the intervention will/is designed to contribute be identified/foreseen? (Specify time frame where possible.)	<ul style="list-style-type: none"> <li>Consider module proposal for suggested impact and program objective indicators (program proposal), if it is not an individual measure</li> <li>Potential basis for assessment: program objective indicators, identifiers, connection to the national strategy for implementing 2030 Agenda, connection to SDGs</li> </ul>	<p>The extent to which there is a functioning and effective competition policy oversight by the competition authorities which is 'likely' to result, in the medium- to long-run, in cheaper and better-quality products and services on the domestic markets.</p> <p>The extent to which (non-tariff) barriers to trade in services are being lowered which is 'likely' to result, in the short- to medium-run, in an increase in cross-border trade and investment in services.</p>	<p><b>Evaluation design:</b> Direct quantitative and qualitative enquiry</p> <p><b>Evaluation methods:</b> Quantitative data collection Document review Key informant interviews Focus group discussions</p>	<p><b>Documents</b> Project completion report</p> <p><b>Key informants' interviews (see Chapter 2 and 3 in Inception / Evaluation Report for specification)</b> Direct target group Indirect target group Project steering committee members</p> <p><b>Quantitative data</b> Information from direct target group ADB Key Indicator Database</p>	<p>Qualitative data is expected to be good due to the number and diversity of key informants.</p> <p>Quantitative data on actual competition policy practice and reduction of trade barriers is expected to be limited and inconsistent in type and quality across the countries.</p>	good
	IZR	To what extent have the IZR criteria contributed to strengthening overarching development results?	<ul style="list-style-type: none"> <li>Please use CPE factsheet on SV / GV / IZR</li> </ul>					
	Standard	To what extent can the higher-level development changes (social, economic, environmental dimensions and the interactions between them) be identified/foreseen at the level of the intended beneficiaries? (Specify time frame where possible.)		Same as above	Same as above	Same as above	Data is expected to be indicative at best in terms of likely impact at the level of the end beneficiaries due to the time lag before these impacts are likely to be observable.	moderate

	Standard	To what extent can higher-level development changes to which the intervention will/is designed to contribute be identified/foreseen at the level of particularly disadvantaged/vulnerable groups of beneficiaries and stakeholders? (These may be broken down by age, income, gender, ethnicity, etc.) (Specify time frame where possible.)		Not applicable: the project operates at the national level for the indiscriminate benefit of all businesses and consumers.	Not applicable	Not applicable	Not applicable	
Contribution to higher-level (intended) development changes	Standard	To what extent has the intervention actually contributed to the identified and/or foreseeable higher level development changes (social, economic, environmental dimensions and their interactions, taking into account political stability) that it was designed to bring about?	<ul style="list-style-type: none"> <li>Contribution analysis (evaluation design) as minimum standard and focus of this assessment dimension, further approaches are possible and welcome, see also annotated reports</li> <li>Evaluation of the project's contribution to impacts based on an analysis of the results hypotheses from outcome to impact level</li> </ul>	The project's theory of change, including impact hypotheses	<b>Evaluation design:</b> Theory-based evaluation Direct enquiry Contribution analysis  <b>Evaluation methods:</b> Document review Literature review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders  <b>Quantitative data</b> Information from direct target group ADB Key Indicator Database	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	Standard	To what extent has the intervention achieved its intended (original and, where applicable, revised) development objectives?	<ul style="list-style-type: none"> <li>This question can already be assessed in Dimension 1 Question 1, the contribution to impact is assessed in Dimension 2, Question 1</li> </ul>	Same as above	Same as above	Same as above	Same as above	good
	Standard	To what extent has the intervention achieved its (original and, where applicable, revised) development objectives at the level of the intended beneficiaries?		Same as above	Same as above	Same as above	Data is expected to be indicative at best in terms of likely impact at the level of the end beneficiaries due to the time lag before these impacts are likely to be observable.	moderate
	Standard	To what extent has the intervention contributed to higher-level development changes/changes in the lives of		Not applicable: the project operates at the national level for the indiscriminate benefit of all businesses and consumers.	Not applicable	Not applicable	Not applicable	

		particularly disadvantaged or vulnerable groups of beneficiaries and stakeholders that it was designed to bring about? (These may be broken down by age, income, gender, ethnicity, etc.).						
Standard	Which internal factors (technical, organisational or financial) were decisive for achievement/non-achievement of the intervention's intended development objectives?	<ul style="list-style-type: none"> <li>Internal factors = within the project's sphere of responsibility / system boundary. The project is implemented jointly by GIZ and the official partner(s)</li> </ul>	Same as under first question under contribution	Same as under first question under contribution	Same as under first question under contribution	Same as under first question under contribution	good	
Standard	Which external factors were decisive for the achievement/non-achievement of the intervention's intended development objectives?	<ul style="list-style-type: none"> <li>External factors = outside the project's sphere of responsibility / system boundary. The project is implemented jointly by GIZ and the official partner(s).</li> <li>Take into account the activities of other actors or other policies, framework conditions, other policy areas, strategies or interests (German ministries, bilateral and multilateral development partners)</li> </ul>	Same as above	Same as above	Same as above	Same as above	good	
Standard	To what extent has the intervention achieved structural or institutional changes (e.g. for organisations, systems and regulations)?		Same as above, plus see sustainability	Same as above	Same as above	Same as above	good	
Standard	To what extent did the intervention serve as a model and/or achieve broad-based impact?	<ul style="list-style-type: none"> <li>Scaling-up is a consciously designed process to anchor changes in organisations and cooperation systems (e.g. concepts, approaches, methods) to generate broad impact</li> <li>There is vertical scaling-up, horizontal scaling-up, functional scaling-up or a combination of these<sup>2</sup></li> <li>also analyse possible potential and reasons for not exploiting it</li> </ul>	Same as above	Same as above	Same as above	Same as above	good	

		IZR	To what extent has the project made an innovative contribution (or a contribution to innovation)? Which innovations have been tested in different regional contexts? How are the innovations evaluated by which partners?	• Please use CPE factsheet on SV / GV / IZR					
		Standard	<i>How would the situation have developed without the intervention?</i>	• usually qualitative reflection, quantitative approaches welcome	Same as above	Same as above	Same as above	Same as above	good
	<b>Contribution to higher-level (unintended) development changes</b>	Standard	To what extent can higher-level, unintended development changes (social, economic and environmental dimensions and their interactions, taking into account political stability) be identified/foreseen? (Specify time frame where possible.)		Open enquiry among all key informants to the evaluation into the (unintended) outcomes of the project, the benefits and risks emanating from them, and how the project responded to them.	<b>Evaluation design:</b> Direct enquiry  <b>Empirical methods:</b> Document review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good
		and Fragility	To what extent did the project have (unintended) negative or escalating effects on the conflict or the context of fragility (e.g. conflict dynamics, violence, legitimacy of state and non-state actors/institutions)? To what extent did the project have positive or deescalating effects on the conflict or the context of fragility (e.g. conflict dynamics, violence, legitimacy of state and non-state actors/institutions)?		Same as above	Same as above	Same as above	Same as above	good

	Standard	To what extent has the intervention brought about foreseeable/identifiable unintended (positive and/or negative) higher-level development results?	<ul style="list-style-type: none"> <li>Analyse whether the risks were already known in the design phase</li> <li>Check how the assessment of risks in connection with (unintended) negative or (not formally agreed) positive results at the impact level in the monitoring system has been carried out (e.g. use of 'compass')</li> <li>measures taken to avoid or counteract the risks/ negative effects/ trade-offs<sup>3</sup></li> <li>Determine relevant framework conditions for negative results and the project's reaction to them</li> <li>Examine to what extent potential (not formally agreed) positive results and synergies between the ecological, economic and social development dimensions have been monitored and exploited</li> </ul>	Same as above	Same as above	Same as above	Same as above	good
	Standard	To what extent has the intervention contributed to foreseeable/identifiable unintended (positive and/or negative) higher-level development results at the level of particularly disadvantaged or vulnerable groups of beneficiaries and stakeholders? (These may be broken down by age, income, gender, ethnicity, etc.)		Unlikely: the project operates at the national level for the indiscriminate benefit of all businesses and consumers. Nevertheless: same as above	Same as above	Same as above	Same as above	

(1) The first and second assessment dimensions are interrelated: If the project's contribution to achieving the objective is small (2nd assessment dimension), this must also be taken into account when evaluating the first assessment dimension.

(2) See GIZ 2016 'Guidelines on scaling-up for programme managers (AV) and planning officers'

(3) Risks, negative effects and trade-offs are separate aspects that should be discussed individually at this point.



**OECD-DAC Criterion Efficiency - How well are resources being used? (max. 100 points)**

This criterion describes the extent to which the intervention delivers results in an economic and timely way (relationship between input and output, outcome and impact level). The evaluation dimension **"production efficiency"** refers to the appropriateness of the relationship between inputs and outputs. The evaluation dimension **"allocation efficiency"** refers to the appropriateness of the relationship between the inputs and the results achieved (project/development objective; outcome/impact level) by the intervention. The "efficiency" criterion relates both to the intervention's design and implementation and to the results it achieves.

Assessment dimensions	Filter - Project Type	Evaluation questions	Clarifications	Basis for Assessment / Evaluation indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)
<b>Production efficiency</b>	Standard	<i>How are the intervention's inputs (financial, human and material resources) distributed (e.g. by instruments, sectors, sub-interventions, taking into account the cost contributions of partners/executing agencies/other beneficiaries and stakeholders etc.)?</i>	<ul style="list-style-type: none"> <li>• Description of the data: Costs per output, type of costs, agreed and provided partner contributions</li> <li>• Description of the deviations between original planned costs and actual costs (with comprehensible justification, changes are certainly desirable for increased efficiency)</li> </ul>	<p>The set of questions under production efficiency inquires into:</p> <ul style="list-style-type: none"> <li>- How much money was spent per output?</li> <li>- What were the most effective inputs?</li> <li>- Were there ineffective inputs?</li> <li>- Could the same results have been achieved with less resources?</li> <li>- Could better results have been achieved through a different allocation of resources?</li> <li>- What internal and external (contextual) factors / developments influenced the resource allocation choices?</li> <li>- Did internal or external coherence allow for a more efficient implementation?</li> <li>- How did the partner contributions contribute to the cost-effectiveness?</li> <li>- Did the project apply a Follow-the-money approach and analysis in project steering?</li> <li>- Did the project set-up (structure, processes, organization, etc.) enable / facilitate the efficient implementation and steering of the project?</li> <li>- How were resource savings used?</li> </ul>	<p><b>Evaluation design:</b></p> <ul style="list-style-type: none"> <li>- Follow-the-money approach</li> <li>- Contribution analysis</li> <li>- Yield maximization and cost minimization analysis</li> </ul> <p><b>Empirical methods:</b></p> <ul style="list-style-type: none"> <li>- Efficiency tool</li> <li>- Key informant interviews</li> <li>- Literature review</li> </ul>	<p><b>Documents:</b></p> <p>Cost-unit commitment report Human resource allocation report Operational plan of the project International literature</p> <p><b>Key informants (see Chapter 2 and 3 in Inception / Evaluation Report for specification):</b></p> <p>Project team Direct target groups Project steering committee members Other stakeholders (e.g. COMPETE experts)</p>	Project results (including time of delivery) and financial data is reported according to GIZ standard. Allocation of cost categories over outputs is done based on expert-judgment from the project team (in consultation with the evaluation team). Quantitative and qualitative data are expected to be good.	good

	Standard	To what extent have the intervention's inputs (financial, human and material resources) been used economically in relation to the outputs delivered (products, investment goods and services)? If possible, refer to data from other evaluations in a region or sector, for instance.	<ul style="list-style-type: none"> <li>• Use of 'Efficiency tool' including instructions and use of the follow-the-money approach as evaluation design (may be combined with other high-quality approaches)</li> <li>• Output level: Analysis of approaches and activities as well as TC instruments (personnel instruments, financing, materials and equipment)<sup>1</sup> compared to possible alternatives with a focus on the minimum principle (use of comparative data if available)</li> <li>• The project is oriented on internal or external benchmarks in order to achieve its effects economically</li> <li>• Regular reflection of the resources used by the project with focus on economical use of resources and cost risks</li> <li>• The overarching costs of the project are in an appropriate proportion to the costs of the outputs</li> </ul>	Same as above	Same as above	Same as above	Same as above	good
	Standard	<p>To what extent could the intervention's outputs (products, investment goods and services) have been increased through the alternative use of inputs (financial, human and material resources)? If possible, refer to data from other evaluations of a region or sector, for instance. (If applicable, this question adds a complementary perspective")</p> <p>* This case is always applicable in the technical cooperation (TC), please answer the question bindingly</p>	<ul style="list-style-type: none"> <li>• Use of 'Efficiency tool' including instructions and use of the follow-the-money approach as evaluation design (may be combined with other high-quality approaches)</li> <li>• Output level: Analysis of approaches and activities as well as TC instruments (personnel instruments, financing, materials and equipment)<sup>1</sup> compared to possible alternatives with focus on output maximization (use of comparative data if available)</li> <li>• Analysis of alternative options for allocating resources and shifts between outputs for output maximisation</li> <li>• saved resources can and should be used to maximise outputs</li> <li>• Reflection of the resources during the design phase and regularly during the implementation of the project with focus on output maximisation (with comprehensible justification, changes are certainly desirable for increased</li> </ul>	Same as above	Same as above	Same as above	Same as above	good

			efficiency) • 'imaximising outputs' means with the same resources, under the same conditions and with the same or better quality					
	Standard	Were the outputs (products, investment goods and services) produced on time and within the planned time frame?		The project outputs and outcomes are to be realized by 31 October 2022	<b>Evaluation design:</b> Direct enquiry  <b>Empirical methods:</b> Document review Key informant interviews	<b>Documents</b> Project completion report Final update results matrix  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Quantitative data is expected to be good due to the project's reporting requirements. Qualitative data is expected to be good due to the number and diversity of key informants.	good
Allocation efficiency	Standard	<i>By what other means and at what cost could the results achieved (higher-level project objective) have been attained?</i>		Same as above - see row 4 (albeit at the outcome level)	Same as above - see row 4	Same as above - see row 4	Same as above - see row 4	good
	Standard	To what extent – compared with alternative designs for the intervention – could the results have been attained more cost-effectively?	• Outcome level: Analysis of approaches and activities as well as TC-instruments in comparison to possible alternatives with focus on minimum principle (use of comparative data if available) • Regular reflection in the project of the input-outcome relation and alternatives as well as cost risks • The partner contributions are proportionate to the costs for the outcome of the project	Same as above	Same as above	Same as above	Same as above	good

	Standard	<p>To what extent – compared with alternative designs for the intervention – could the positive results have been increased using the existing resources? (If applicable, this question adds a complementary perspective")</p> <p>* This case is always applicable in the technical cooperation (TC), please answer the question bindingly</p>	<ul style="list-style-type: none"> <li>• Outcome level: Analysis of applied approaches and activities as well as TC-instruments compared to possible alternatives with focus on maximizing the outcome (real comparison if available)</li> <li>• The project manages its resources between the outputs in such a way that the maximum effects in terms of the module objective are achieved</li> <li>• Regular reflection in the project of the input-outcome relation and alternatives</li> <li>• Reflection and realization of possibilities for scaling-up</li> <li>• If additional funds (e.g. co-financing) have been raised: Effects on input-outcome ratio (e.g. via economies of scale) and the ratio of administrative costs to total costs</li> <li>• Losses in efficiency due to insufficient coordination and complementarity within German DC are sufficiently avoided</li> </ul>	Same as above	Same as above	Same as above	Same as above	good
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(1) see GIZ 2015: 'Integration of TC Instruments – Key Elements', based on BMZ 2014: Handbuch der bilateralen TZ Verfahrensinformation Nr. VI0362014 'Eckpunkte zur Instrumentenintegration'

<b>OECD-DAC Criterion Sustainability - Will the benefits last? (max. 100 points)</b> The 'sustainability' criterion relates to continued long-term benefits (at the outcome and impact level) or the probability of continued long-term benefits – taking into account observed or foreseeable risks – over time, particularly after assistance has ended.									
Assessment dimensions	Filter - Project Type	Evaluation questions	Clarifications	Basis for Assessment / Evaluation indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)	
Capacities of the beneficiaries and stakeholders	Standard	To what extent do the beneficiaries and stakeholders (individuals, groups and organisations, partners and executing agencies) have the institutional, human and financial resources as well as the willingness (ownership) required to sustain the positive results of the intervention over time (once assistance has drawn to a close)?	• Transitional Development Assistance (TDA) projects primarily address final beneficiaries, whose resilience to crises and recurring shocks is to be strengthened. The focus for TDA projects is thus often on the resilience of final beneficiaries and/or at least the continuity of the measure (see explanation in dimension 3) (clarification in the inception phase of the evaluation).	The extent to which the direct target group have the perspective, knowledge, capacity, incentive, political support, authority, autonomy, negotiating prowess, willingness, and tenacity to continue the work after GIZ's support ceases.	<b>Evaluation design:</b> Direct enquiry  <b>Empirical methods:</b> Key informant interviews Focus group discussions	<b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good	
	Standard	To what extent do the beneficiaries and stakeholders (individuals, groups and organisations, partners and executing agencies) have the resilience to overcome future risks that could jeopardise the intervention's results?		Same as above	Same as above	Same as above	Same as above	good	
Contribution to supporting sustainable capacities	Standard	To what extent has the intervention contributed to the beneficiaries and stakeholders (individuals, groups and organisations, partners and executing agencies) having the institutional, human and financial resources as well as the willingness (ownership) required to sustain the intervention's positive results over time and to limit the impact of any negative results?	• Analysis of the preparation and documentation of learning experiences • Description of the anchoring of contents, approaches, methods and concepts in the partner system • Reference to exit strategy of the project • If there is a follow-on project, check to what extent the results of the evaluated project are taken up; the anchoring of the effects in the partner's organisation should be pursued independently of a follow-on project, since sustainability should be achieved even without donor funds • Transitional Development Assistance (TDA) projects primarily address final beneficiaries, whose resilience to crises and recurring shocks is to be strengthened. The focus for	The project's theory of change, including results hypotheses	<b>Evaluation design:</b> Theory-based evaluation Direct enquiry Contribution analysis  <b>Evaluation methods:</b> Document review Literature review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good	

			TDA projects is thus often on the resilience of final beneficiaries and/or at least the continuity of the measure (see explanation in dimension 3) (clarification in the inception phase of the evaluation).						
	Standard	To what extent has the intervention contributed to strengthening the resilience of the beneficiaries and stakeholders (individuals, groups and organisations, partners and executing agencies)?		Same as above	Same as above	Same as above	Same as above	good	
	Standard	To what extent has the intervention contributed to strengthening the resilience of particularly disadvantaged groups? (These may be broken down by age, income, gender, ethnicity, etc.)		Not applicable: the project operates at the national level for the indiscriminate benefit of all businesses and consumers.	Not applicable	Not applicable	Not applicable		
Durability of results over time	Standard	<i>How stable is the context in which the intervention operates?</i>							
	Standard	<i>To what extent is the durability of the intervention's positive results influenced by the context?</i>	<ul style="list-style-type: none"> <li>Consideration of risks and potentials for the long-term stability of the results and description of the reaction of the project to these</li> </ul>						
	Standard	To what extent can the positive (and any negative) results of the intervention be deemed durable?	<ul style="list-style-type: none"> <li>Consideration of the extent to which continued use of the results by partners and beneficiaries can be foreseen</li> <li>Reference to conditions and their influence on the durability, longevity and resilience of the effects (outcome and impact)</li> <li>In the case of projects in the field of Transitional Development Assistance (TDA), at least the continuity of the measure must be examined: To what extent will services or results be continued in future projects (of GIZ or other donors/organizations) or their sustainability ensured? (Clarification in the inception phase)</li> </ul>	This question seeks to draw a conclusion from the analysis of the first two dimensions under this evaluation criterion and come to a prediction as to the likelihood that the key stakeholders will continue to effectively implement competition policy and promote free(er) trade in services.	<b>Evaluation design:</b> Inductive and deductive analysis  <b>Evaluation methods:</b> Key informant interviews Focus group discussions Literature review	<b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good	

Predecessor project, follow-on project and further evaluation questions						
Assessment dimensions	Evaluation questions	Basis for Assessment / Evaluation indicators (e.g. module objective/programme indicators, selected hypotheses, or more generally a definition of the aspects to be used for evaluation)	Evaluation Design and empirical methods (Design: e.g. Contribution analysis, Follow-the-Money Approach) (Methods: e.g. interviews, focus group discussions, document analysis, project/partner monitoring system, workshop, online survey, etc.)	Data sources (e.g. list of relevant documents, interviews with stakeholder category XY, specific data, specific monitoring data, specific workshop(s), etc.)	Data Quality and limitations (Description of limitations, assessment of data quality: poor, moderate, good, strong)	Data Quality Assessment (weak, moderate, good, strong)
Impact of the predecessor project (if predecesser project exists)	Which results were envisaged at the impact level of the predecessor project and which were achieved?					
	Which results of the predecessor are still visible today at impact level?	The extent to which there is a functioning and effective competition policy oversight by the competition authorities which is 'likely' to result, in the medium- to long-run, in cheaper and better-quality products and services on the domestic markets.  The extent to which (non-tariff) barriers to trade in services are being lowered which is 'likely' to result, in the short- to medium-run, in an increase in cross-border trade and investment in services.	<b>Evaluation design:</b> Direct quantitative and qualitative enquiry  <b>Evaluation methods:</b> Quantitative data collection Document review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report  <b>Key informants interviews (see Chapter 2 and 3 in Inception / Evaluation Report for specification)</b> Direct target group Indirect target group Project steering committee members  <b>Quantitative data</b> Information from direct target group ADB Key Indicator Database	Qualitative data is expected to be good due to the number and diversity of key informants.  Quantitative data on actual competition policy practice and reduction of trade barriers is expected to be limited and inconsistent in type and quality across the countries.	good
	Which results of the predecessor are only visible today at impact level?	Same as above	Same as above	Same as above	Same as above	good
	How were changes in the framework conditions handled over time (including transition between different projects)? Which decisions in previous projects influence the impact of the predecessor as well as the current project until today? How?	Open enquiry	<b>Evaluation design:</b> Direct enquiry  <b>Evaluation methods:</b> Document review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	What were factors for success / failure for the impact of the predecessor?	The project's theory of change, including impact hypotheses	<b>Evaluation design:</b> Theory-based evaluation Direct enquiry Contribution analysis  <b>Evaluation methods:</b> Document review Literature review Key informant interviews Focus group discussions	<b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN  <b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders  <b>Quantitative data</b>	Qualitative data is expected to be good due to the number and diversity of key informants.	good



				Information from direct target group ADB Key Indicator Database		
<b>Sustainability of the predecessor project (if predecessor project exists)</b>	<i>Which results were envisaged at the outcome level of the predecessor project and which were achieved?</i>					
	Which results at outcome level (and important outputs) are still present or have been further developed by the partners? (without external funding vs. with external funding)	<p>The extent to which there is a functioning and effective competition policy oversight by the competition authorities which is 'likely' to result, in the medium- to long-run, in cheaper and better-quality products and services on the domestic markets.</p> <p>The extent to which (non-tariff) barriers to trade in services are being lowered which is 'likely' to result, in the short- to medium-run, in an increase in cross-border trade and investment in services.</p>	<p><b>Evaluation design:</b> Direct quantitative and qualitative enquiry</p> <p><b>Evaluation methods:</b> Quantitative data collection Document review Key informant interviews Focus group discussions</p>	<p><b>Documents</b> Project completion report</p> <p><b>Key informants' interviews (see Chapter 2 and 3 in Inception / Evaluation Report for specification)</b> Direct target group Indirect target group Project steering committee members</p> <p><b>Quantitative data</b> Information from direct target group ADB Key Indicator Database</p>	<p>Qualitative data is expected to be good due to the number and diversity of key informants.</p> <p>Quantitative data on actual competition policy practice and reduction of trade barriers is expected to be limited and inconsistent in type and quality across the countries.</p>	good
	How were the results of the predecessor anchored in the partner structure?	The extent to which the direct target group have the perspective, knowledge, capacity, incentive, political support, authority, autonomy, negotiating prowess, willingness, and tenacity to continue the work after GIZ's support ceases.	<p><b>Evaluation design:</b> Direct enquiry</p> <p><b>Empirical methods:</b> Key informant interviews Focus group discussions</p>	<p><b>Key informants interview</b> Direct target group Indirect target group Project steering committee members Other stakeholders</p>	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	How were changes in the framework conditions handled over time (including transition between different projects)? Which decisions in previous projects influence the sustainability of the predecessor and the current project until today? How?	Open enquiry	<p><b>Evaluation design:</b> Direct enquiry</p> <p><b>Evaluation methods:</b> Document review Key informant interviews Focus group discussions</p>	<p><b>Documents</b> Project completion report</p> <p><b>Key informants interviews</b> Direct target group Indirect target group Project steering committee members Other stakeholders</p>	Qualitative data is expected to be good due to the number and diversity of key informants.	good
	What were factors for success / failure for the sustainability of the predecessor?	The project's theory of change, including results hypotheses	<p><b>Evaluation design:</b> Theory-based evaluation Direct enquiry Contribution analysis</p> <p><b>Evaluation methods:</b> Document review Literature review Key informant interviews Focus group discussions</p>	<p><b>Documents</b> Project completion report International literature on competition policy and trade in services Political economy analysis of policy change and ASEAN</p> <p><b>Key informants interviews</b> Direct target group Indirect target group</p>	Qualitative data is expected to be good due to the number and diversity of key informants.	good

				Project steering committee members Other stakeholders		
Follow-on project: Analysis of the design and recommendations for implementation (if a follow-on project exists)	Evaluability and design of the successor: Are the results model for the follow-on project including the results hypotheses, the results-oriented monitoring system (WoM) and the project objective indicators plausible (and in line with current standards)? Are there - also based on the evaluation of the current project - recommendations for improvements in the further course of the follow-on project?	BMZ Offer still to be received.				
	Based on the results of the evaluation of the current project: Which recommendations can be derived for the implementation of the follow-on project?					



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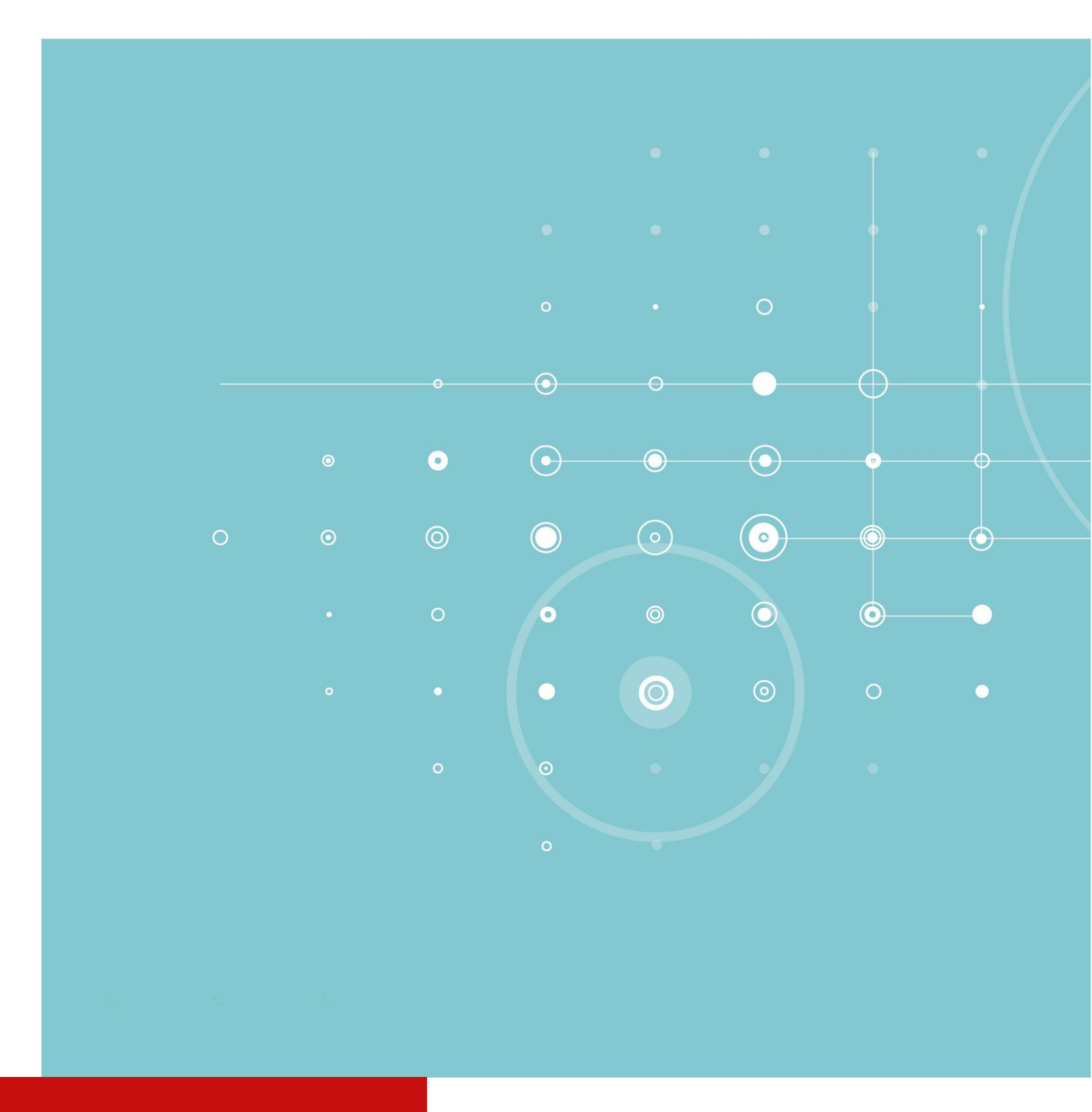
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