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October 13, 1998

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Dear Ms Miller,

As understood in the ENGO review process, we are sending you the report of CELA's organizational review. We would very much appreciate if you could check if there are any factual mistakes, and we welcome any comment you may have on the document.

You can contact Mr. Charles Lusthaus by phone or by e-mail (charles7@umg.ca) or Ms Alicia Sliwinski (alicias@umg.ca).

We thank you again for all your cooperation and wait to hear from you soon.

Regards,



Alicia Sliwinski
for Mr. Charles Lusthaus

Canadian Environmental Law Association

October 1998

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1. Introduction

The Canadian Environmental Law Association (CELA) is a non-profit public organization established in 1970 by a group of law students and community activists concerned about environmental law. At the time, few agencies or laws existed regarding environmental issues of public concern such as waste management, toxic chemical use and resource exploitation. CELA's first case dealt with the expansion of major dump sites around the Toronto area. In 1977, CELA received funding from the Ontario Legal Aid Plan as part of the province's community led clinic system. Over the years, CELA's staff acquired significant expertise in areas ranging from hydro-geology, nuclear energy, acid rain and international treaties and laws. Today, CELA is active on different fronts. Its objectives are to:

- provide effective legal assistance on issues of environmental law to those who cannot afford representation;
- to promote, through legal channels, standards and objectives that will ensure maintenance of environmental quality;
- to preserve environmental heritage and to encourage the sustainable use of energy resources.

CELA takes action on various issues, such as air and water pollution, timber management, landfill sites and toxic waste disposal. Over the past two decades, CELA has been intimately involved in advocacy for, and the development of, effective environmental regulation in Canada. It is also interested in international environmental issues, and works on ESDP funded projects dealing with issues such as:

- Confronting the eco-limits of "free trade"
- Mineral Development in The Public Interest (current ESDP project)
- Environmental Implications Of Trade And Trade Agreements
- Review of the Trade-Related Intellectual Property (TRIPs) Chapter to the 1994 GATT/WTO Agreements in 1999

1.1 Purpose of the Report

The specific objectives of this review are:

- to provide CIDA with an independent review of CELA, which combined with similar reviews of other ENGOs, will provide a basis for informed decisions regarding whether or not to change the funding relationship from project to program funding; and
- to provide reliable findings, observations and recommendations useful to these ENGOs and CIDA for improving the ENGOs organizational performance in areas related to the review categories.

1.2 The Review Team And Their Roles

The review team consists of Universalia consultants Dr. Charles Lusthaus, Dr. Marie-Hélène Adrien and Alicia Sliwinski. Janet Mrenica a financial analyst from CIDA's Financial Risk Assessment Unit (FRAU) did the financial analysis of the organization. Nalini Perera, Kathryn Zimmer and Jan Barnabe, CIDA's ESDP Program Director and Officers contributed to the study by providing important insights about CIDA's program relationship with environmental organizations in general, and with the particular ENGOs they are currently working with. CIDA staff also visited ENGOs, and conducted field work and data collection overseas for those ENGOs with partners in South America. Finally, Alicia Sliwinski collected data for the specific ENGOs with partners in Africa.

2. Methodology

2.1 Overall Method

CIDA asked the review team to carry out the assignment by utilizing the methodology that Universalialia developed in cooperation with the ENGOs it reviewed in 1997. The methodology has been tested and found to be consistent with CIDA's overall approach to ENGOs, and responsive to ENGOs need for feedback and learning with respect to CIDA programming requirements.

The review approach includes five areas of investigation, with a set of standards associated with each area (see appendix II). Specific data collection instruments were used to elicit information on the various standards. Field data in South America and Africa was collected from the specific ENGO partners, as well as other relevant program informants. This field data provided Universalialia with information about the nature of ENGO partnerships and specific project results.

In Canada, data was collected through file reviews, on-site observations, surveys, and interviews with the Executive Director, Board members, project staff and, if possible, volunteers. In addition to this, all the ENGOs underwent a Stage One Financial Risk Assessment (FRAU) which was used as data for the review of the ENGOs' financial systems. In the case of certain ENGOs, a more in-depth Stage Two assessment was initiated as well.

In order to write the report and make recommendations to CIDA with respect to each ENGO's potential for future program funding, Universalialia relied on the data it had collected in Canada, the FRA (financial risk assessment) report(s) provided by CIDA, and the data received from field missions. The findings presented in the reports focus primarily on the standards established for each category of the review matrix (e.g. financial systems, governance, etc.).

2.2 Specific Methodology

A variety of methods was used for collecting data on CELA. Files and documents requested from and provided by CIDA and CELA were reviewed. A visit was made to CELA's centre in Toronto, and to Cooperacion, its partner organization in Peru. Information from the President, Treasurer, and members of CELA's Board was gathered through interviews during the visit to their centre, and questionnaires. In-depth interviews were also held with the Centre's Executive Director, International Program staff, and the financial coordinator.

2.3 Limitations

As with all organizational reviews, there are limitations inherent in the methodologies chosen and their application. These must be borne in mind when reading and interpreting the results of the study.

Possible limitations include:

- This exercise was not intended to be an organizational assessment or evaluation. The objective of the review was primarily to consider, based on answers to questions and assessment standards previously agreed to, the acceptability of moving an ENGO from project to program funding. The findings presented herein try to address this goal.
- As is the case during most reviews, a limited amount of time was allowed for data collection and analysis. Thus, we were not able to go into as much depth when gathering or analyzing data as we might have hoped to.

3. Findings

3.1 Financial Systems

The financial assessment was done by reviewing the organizations financial statements from the past three years. Whenever possible, the methods and procedures used for recording the ENGO's financial information were discussed with either the organization's bookkeeper or accountant. These discussions of financial systems along with a review of key risk indicators (reliance on CIDA revenue, net cash to deferred revenue, liquidity status and operational results) helped us in our attempt to determine the financial risk to CIDA and the capacity of the organizations financial systems to account for its organizational and programming activities. Our estimation of the level of risk to CIDA and the ENGO's organizational capacity to manage a 3 year program fund based on the standards agreed to is presented in the report.

Finding 1: Results of the FRAU assessment indicate that CELA represents a medium low risk to CIDA.

According to the FRAU report, CELA represents a medium low risk. This indicates that it is minimally dependent on CIDA Funds, its current assets cover its liabilities, and it has sufficient equity to support downturns in its ability to generate revenue. An area of some concern however, is the fact CELA has been operating with financial losses during the last two years. Although these have been offset relatively easily by surpluses from previous years, obviously they are not sustainable. We are told that the financial picture of CELA is stabilizing and that further losses are not expected. Moreover, a new funding arrangement with the Government of Ontario should stabilize the organization's financial picture.

Finding 2: CELA's financial systems are set up to respond to their major funder.

Since 1989, many of CELA's finances and bookkeeping services have been contracted out to the Progressive Accounting Services (PAS). PAS is a local firm who developed an automated accounting system for the Ontario Legal Aid Program (OLAP) clinics. OLAP is the main funder of CELA. CELA also employs a financial coordinator who is responsible for all accounts payable and receivable, banking and investments, preparing budgets and financial reports for the Board and so forth. This internal and external split in function provides CELA with excellent control of OLAP funds.

Within the last few months, CELA also underwent a major review (including a financial review) by the Ontario Legal Aid Program (OLAP). We have been told by the Executive Director that the informal feedback he received from the review team was highly favorable. However, CELA's financial systems are not ideally suited for project work.

Finding 3: CELA's financial systems are adequate for occasional project work. However, if it decides to move to more project oriented work (eg. program funding) its financial systems will need to accommodate this shift..

The fact that CELA makes use of an external accounting firm is an indication of how seriously it treats financial matters. However, the financial systems in place focus primarily on CELA's major funder and their needs. Any other project work is handled independently through separate accounts. There is no consolidated accounting system for such projects, nor are consolidated statements given to the Board. While this is adequate in terms of continuing CELA's existing work, if CELA wants to engage in more project oriented work, as would be the case if it were to receive program funding, a more integrated financial system would be needed.

Finding 4: Procedures for obtaining financial reports from overseas partners are in the process of being developed.

The exploratory phase of the ESDP program was completed in 1997 and a new cycle of project funding is just beginning. There was an opportunity to review the use of funds and procedures during the preliminary phase of the project. CELA indicates that it had no problem obtaining the information and documentation about its work expenditures that it needed from its foreign partners, since they have experience working with Northern organizations.

3.1.1 Conclusions and Recommendations

This review suggests that CELA is a Canadian ENGO in a relatively strong financial position. CELA indicates that it will be receiving multi-year funding from OLAP, which will cover the cost of its core staff and resources. The FRAU report suggests that the financial risk to CIDA is low. However, as CELA moves into more project oriented activities, its systems will need to be adjusted. Therefore we recommend that:

1. In order to provide insight into the type of project based financial systems that might be of use to CELA, a phase 2 FRAU assessment be undertaken.
2. If it decides to move to Program Funding, CELA consider integrating a project based accounting system into its present system.
3. CELA work with its accountants to develop a consolidated financial report

3.2 Governance

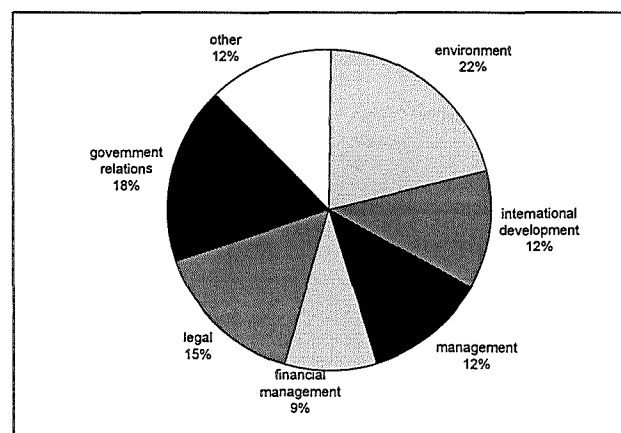
Reviewing governance systems ensures that procedures are in place which provide adequate accountability to the ENGO's membership, donors and overseas partners. In our framework, we are trying to ascertain who the Board represents, and the extent to which it is knowledgeable, accountable and able to control the work of the ENGO. In essence, we are trying to find out how the Board exercises its fiduciary responsibilities and the means it uses to control and guide managerial and program activities.

Finding 5: The board adequately represents a range of qualified people with experience in environment, international development, and management.

CELA has 15 Board members. They represent a wide range of lawyers, environmentalists and other professionals all of whom are interested in the environment of Ontario. Increasingly, CELA Board wants to link Canadian legal environmental issues with global environmental concerns.

The first standard for governance is that the Board have an adequate mix of management, environment and international experience. With respect to CELA, this standard has been met adequately.

Exhibit 3.1 Board members' experience and expertise



Finding 6: While CELA communicates its work to the general public, it is not an organization with a general membership.

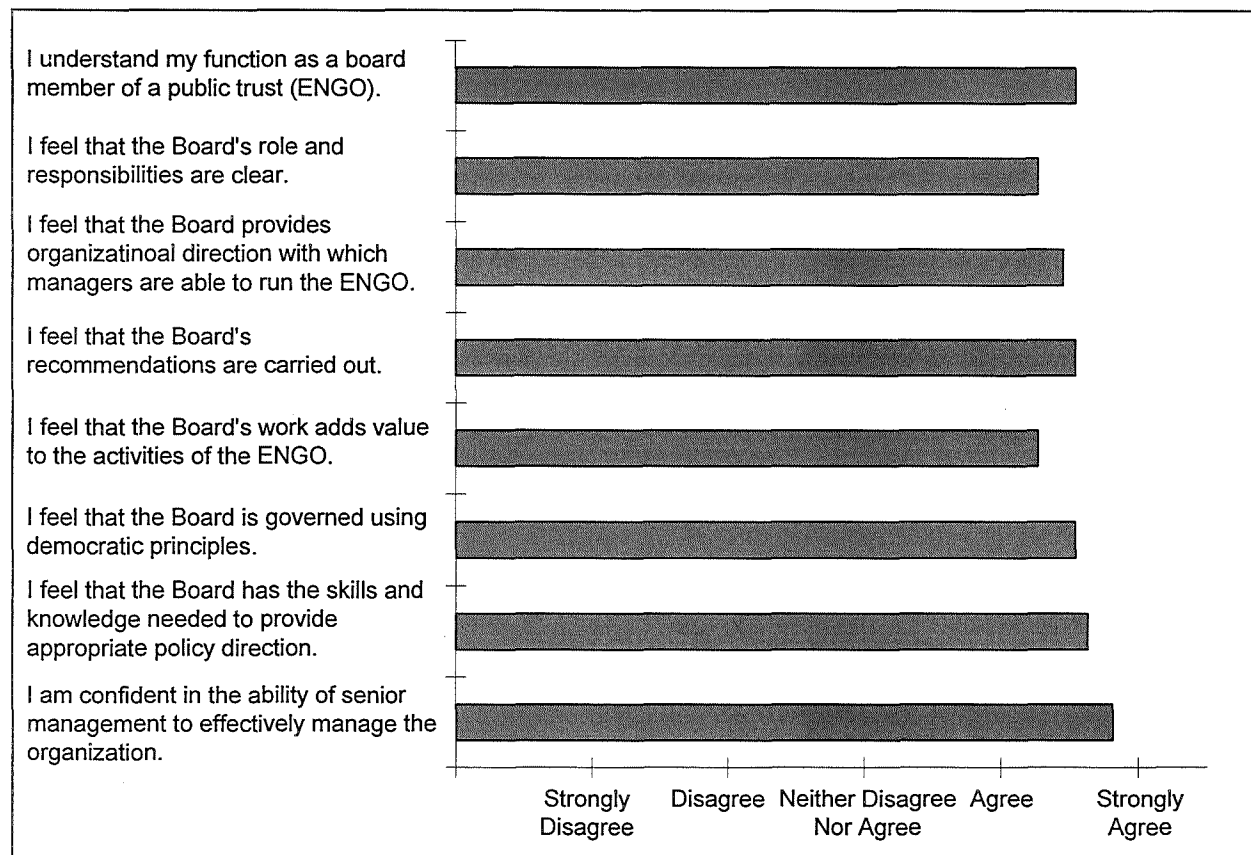
CELA publishes a newsletter and has monthly Board meetings to keep its members and others informed. In terms of membership, CELA is comprised of approximately 30 voting members, with Board positions held by voting members only; there is no general membership. Each year, the existing Board selects nominations to fill open Board positions. Staff are also members of the organization.

In the absence of a general membership, the question of who comprises CELA's constituency becomes an issue. The charter identifies CELA's constituency in terms of its Board members, who are in turn responsible for appointing new Board members, thereby making accountability legally stated. Although broadening the membership base is being discussed, no changes have been made so far.

Finding 7: International programming is a small but evolving aspect of CELA's activities, while reviewing progress of the international work it is not the central preoccupation.

Ontario's environmental legal issues are CELA's principal preoccupation. International work is just beginning to be seen as an important and growing aspect of its work. In this context, interviews indicate that the Board reviews the work of the International Program adequately and feels accountable for it. However, as the organization evolves, it is becoming more and more clear to some Board members that its domestic legal work is inextricably linked with global environmental accords and treaties. Such an expanded view of its work is currently being discussed by the Board and should be integrated into the forthcoming strategic planning exercise. The following exhibit summarizes the responses of Board members to our questionnaire.

Exhibit 3.2 Board Members' Perceptions



3.2.1 Conclusions and Recommendations

CELA's governance systems are adequate to ensure the accountability of its international activities. However, from a strategic perspective, CELA has not fully integrated its domestic and international work. Beyond project approval, the Board has not been involved in developing a strategy for its international activities. Therefore, we recommend that:

- As part of its strategic planning activities, CELA review its international activities and consider how to integrate them with its domestic work.

3.3 Internal Management

Internal Management systems ensure the efficient use of ENGO's resources and provide information appropriate for management decision making. ENGOs generally go through a series of stages in the evolution and development of their management systems. At their inception, these organizations typically become seriously involved with one or more focused environmental issues. People then become attracted to ENGOs because of the issues they address and the type of activism they demonstrate. At this stage, ENGOs are usually relatively small and their management systems are typically informal.

As the work of the ENGO evolves, project and finance systems gradually start being formalized. At some point, the ENGO has to decide on the extent to which it wants to systematize its management routines (staffing, planning, coordination, decision making, strategy and so forth). Questions emerge which need to be answered: Is staff to become permanent? Should a formal human resource strategy be

put in place? Are roles and responsibilities amongst different groups to be clarified? Creating more permanent staff with a mandated strategy is seen as being an important step in an ENGO's evolution.

Finding 8: CELA has gone through various aspects of strategic planning and management but does not have a formalized strategy to guide its international activities.

CELA is an organization with a capable Board and managers. Discussions with Board and staff members suggest that CELA's leaders think about the future in strategic ways. Proposals to OLAP and the Mott Foundation demonstrate this. However, to date, CELA does not have a fully developed and integrated strategic plan. Discussions with the Executive Director of CELA and the international staff suggest that CELA sees the need for a strategic plan those responsible will work on this over the next few months. However, given that the Province will be renewing CELA's OLAP funding and there will be less organizational pressure to create a plan for the future, it would not be unreasonable to expect CELA to take its time when making long term plans.

Given CELA's governing and operational structure, the involvement of the Board and staff in strategic planning activities is structurally guaranteed. However, it is not clear at this point whether the overseas partner will be involved in this exercise. Since they are still at an early stage in their partnership, CELA might want to consider issues related to greater foreign involvement.

Finding 9: Board members are involved and informed of CELA's international activities at a degree they want

CELA's board members are very experienced in environmental and legal questions and feel they have adequate information regarding CELA's international activities. Out of eleven respondents, only three answered that they were involved in CELA's international project. Board members feel they are at a comfortable level of involvement.

Exhibit 3.3

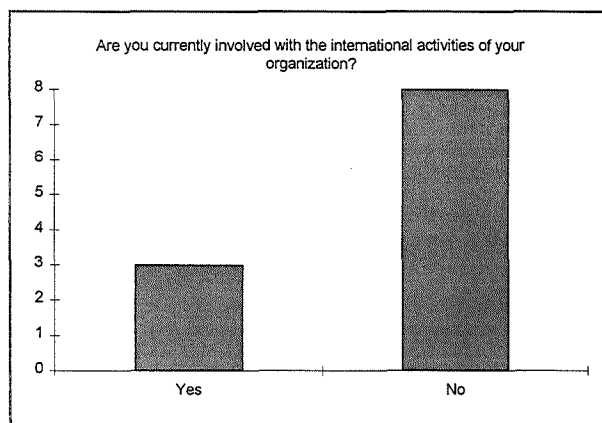
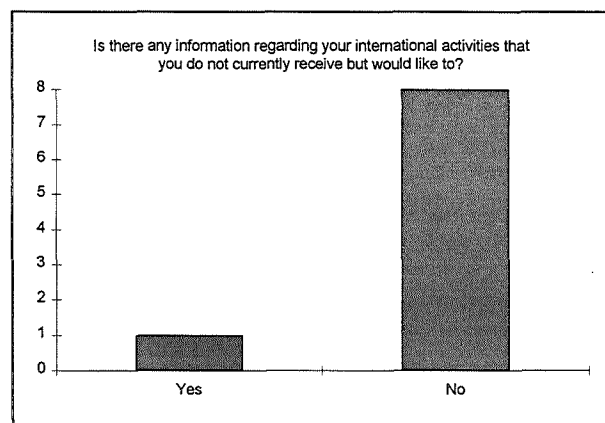


Exhibit 3.4



Finding 10: CELA staff has adequate past experience in international work, and is gaining valuable experience through its work with CIDA and others.

CELA professionals are highly experienced in environmental, legal and international fora. They have adequate experience in development contexts. With respect to their specific CIDA work, their skill sets relate to program objectives and are critical for the development of a strong North South partnership.

Finding 11: Funding for formal staff development is low, however the nature of the work offers informal and non-formal training and development opportunities.

The personnel policy stipulates that the Executive Director has the discretion to support training and development. In reality though, the very nature of the work that CELA does supports a learning and development culture. Although funding is limited, CELA tries to support specific staff upgrading activities as well as staff attendance at conferences. Discussions with staff suggest that there is a desire to learn more about the managerial methods typically associated with international development work; they want to become familiar with the "tool kit" appropriate for the context, methods such as RBM (results based management), LFA (log frame analysis) training and so forth. A concrete suggestion made was that CIDA project officers offer RBM feedback to the proposals and reports they receive. This and other suggestions will be discussed in section 3.4.

Finding 12: The incentive system for international staff, which has until now been based on short term projects, might be strengthened by program funding.

CELA's personnel policy outlines the terms and conditions of employment. In general, the staff views its work as important and is motivated by its significance and the issues that are addressed. From this perspective, short project cycles are much less motivating than a program funding context, which is seen as a step towards greater involvement in international work.

Finding 13: The cost and benefits of international programs are informally rather than formally assessed.

As is the case with most ENGOs, the Executive Director, staff and Board have data on the cost of doing international work, but do not have any formal information about the benefits. This is an area of interest to international staff. They indicate that the lack of data at this time is a function of the recency of their involvement with the ESDP program.

Finding 14: CELA is linked to major provincial, national and international networks involved in advocating for sustainable development.

CELA works at developing and maintaining an important presence in environmental networks in Ontario and across the country. It has substantive competence and credibility as an environmental organization providing, among other things, objective, well-researched legal advice to individuals and groups. However, maximum benefits from networks, contacts, and linkages of various sorts will occur only when they are linked to a comprehensive strategy.

3.3.1 Conclusions and Recommendations

Although the Board is able to discuss the internal and external environment of CELA, it is not articulated in a strategic plan. In a sense, CELA has the pieces of the puzzle, but would benefit from a strategic planning exercise to help it put the pieces together. Interview and questionnaire data indicates that CELA is concerned with defining a long term strategy in order to position itself for the next five to ten years. Given the upcoming renewal of the OLAP grant, CELA could use the next couple of months as a time for non pressured strategic reflection and planning. In this context, we recommend that:

- CELA develop a strategic plan that relates to it's desire to become more active in global issues.
- CELA incorporates a process for monitoring within its plan

3.4 Program Management and Relevance

Assessing program management and relevance deals with determining whether the planning implementation and monitoring processes used by the organization in its international programming support its mission. In particular, we are interested in the quality of the relationship between the Canadian ENGO and its overseas partner, as well as the partnership's ability to build capacity. A final feature of this aspect of the review is the extent to which the project and the partnership support CIDA's priorities.

Finding 15: CELA's overseas partner and overseas projects support CELA's mission.

Cooperaccion (formerly IPEMINI) is a non-profit private organization founded in 1977. Cooperaccion's work includes research, technical assistance, organizational support and education on sustainable natural resource planning, living conditions and employment. Its work focuses on small communities. Mining plays a prominent role in Peru and Canadian firms are very active in exploration and mining. CELA and its partners in Latin America have identified the need to improve the exchange of high quality information about environmentally sound mining practices, policies and laws. This is an increasingly important part of the non OLAP work of CELA.

Finding 16: CELA's project plan has clear objectives, outputs, results and indicators that can be monitored and translated into a results based approach which has been adopted by CIDA.

RBM is still at an early stage within CELA. The new project started this year has clear objectives, outputs, results and indicators but these were not developed within a standard RBM framework. This is not to say that the project can not provide CIDA with results-based data, but rather that it is not framed in such a manner at this time. CELA is interested in CIDA's RBM methodology and welcomes input in helping it develop its approach.

Finding 17: CELA has selected a partner that can be accountable for its project activities.

CIDA review of international project indicates that a good partnership developed between CELA and Cooperaccion. CIDA program Director visited Cooperaccion in Peru and provided verbal feedback to the team about her visit findings. After interviews with key informants and in site visits, it was concluded that the project and nature of the partnership satisfactory to both Canadian and southern ENGOs.

Finding 18: By viewing both the partnership and the project as one of mutual learning and development, CELA contributes to it's overseas partner's capacity to improve the work it does in communities.

Improving the capacity of civil society to advocate for environmentally sound mining practices is a central theme in the partnership. CELA has been engaged in this activity in Canada. It is supporting other groups in doing the same in areas where they have jurisdiction. It is important to note that the work CELA is doing with Cooperaccion is only one part of the complimentary initiatives that the organizations are involved in with respect to environmentally sound mining practices in the Americas. It is their mutual networking and joint learning that make this partnership a capacity building activity.

Finding 19: The exploratory phase between CELA and its partner has been characterized by visits and various contacts all of which seem to point to a successful relationship.

Interviews indicate that a new project will begin in March. Preliminary meetings are expected to be open and frank. CELA has identified certain difficulties, which it is reportedly taking steps to resolve.

Finding 20: While no formal gender policy exists, women are fully integrated into all aspects of the organization and its projects.

Equity questions are central to CELA and its work. In appraising CELA's staff and Board members, one can see that there is a seemingly fair representation of both genders. Interview data suggests that there is a general awareness of gender issues throughout the organization. While no formal policy is in place, it appears that the issue of equity in general, and gender equity in particular, is central to the culture of this organization.

Finding 21: The structure of CELA's project and partnership suggests a sustainable approach to environmental management.

CELA, Cooperacion and its various partners are developing approaches to help the public better understand various mining practices and their effect on the environment. These organizations have a long term strategic approach that utilizes public education, policy advocacy and when possible legal action. This approach offers both Northern and Southern partners an institutionalized way of fighting environmentally unsound mining practices. Since it is comprised of various segments of civil society, the partnership's combined experience provides significant capacity building opportunities in the context of supporting environmentally sound mining practices in the Americas.

3.4.1 Conclusions and Recommendations

Although CELA does exhibit a results-based orientation in its documentation, it is important to make sure that all ENGOs applying for CIDA funding adopt this approach as well. From this perspective, we recommend that:

- CIDA provide training in Results Based Management to all ENGOs that receive program funding.

3.5 Learning Systems

In this section we are concerned with whether the organizational learning that occurs provides sufficient evidence that the ENGO will perform better in the future. Learning is appraised in several ways. First, one looks at how the organization monitors and evaluates its work and uses the information to improve its organizational and project performance. Next, one ascertains what value the organization places on training its staff and personnel. In effect, all the norms and values that support organizational improvement are considered to be a part of the learning systems. Finally, one reviews the extent to which the organization is able to share the lessons learned from its international activities with others.

Finding 22: The organizational culture of CELA supports program learning.

All of the staff interviewed at CELA were eager to talk about the work they do and its importance. They appear to feel part of a larger movement that embraces growth and learning and this is amply reflected in various aspects of the organizational culture. This emphasis on learning and development is manifested concretely in the presence of a library, the newsletters that are produced, and the essential content of the work being done.

Finding 23: While CELA's work in relation to OLAP has been institutionally evaluated, no formal evaluation of its international activities has been undertaken yet.

As mentioned earlier, as part of its contract with OLAP, CELA was recently subject to a comprehensive review of its administrative systems. The review indicated that CELA is a good organization that follows most of the standard management practices which support efficient service delivery. This theme was echoed in interviews with CELA staff, IDRC, and other NGOs we contacted. In general, it appears

that CELA is a respected ENGO that has grown and performed well during the nearly 30 years of its existence. However, although its domestic work has been formally evaluated, this is not the case with respect to its international work. In part, this may be due to the scope and relative novelty of this aspect of its work. CELA's representatives argue that they do get informal feedback from their various members when they participate in international fora. Nevertheless, this is a knowledge gap for CELA that should be remedied.

Finding 24: CELA and its partners disseminate the lessons learned from CELA's international activities.

Information is shared through CELA's newsletter, conferences and other presentations, articles, radio and television coverage, and the Internet. Information exchange of this sort is fundamental to this organization. CELA's publications and educational materials can be found in libraries and institutions around the world.

3.5.1 Conclusions and Recommendations

Although there have been no external evaluations of CELA's international work or of its CIDA projects, the data assembled for this review supports the notion that CELA is a solid organization that has grown and learned over time. CELA's *raison d'être*, which includes advocacy, the promotion of equity and partnership lays the ground work for learning how to enhance laws and policies which protect the environment. CELA's culture of learning is evident in the documents it produces, the activities it undertakes, and personnel it engages.

4. Summary of Findings and Recommendations

The organizational review suggest that CELA is a strong environmental and legal ENGO. It is not dependent on CIDA funds, its Board is aware and strongly implicated in the organization's activities. CELA's internal management and program management systems are characterized by a need for more definition, therefore we recommend:

- that CELA develop a clearer strategy for international work
- as CELA moves towards more international involvement, it should integrate its financial statements
- CELA should reinforce its performance based system which link to CIDA's support for RBM - and should also undertake more formalized evaluation activities.

Appendix I - List of Findings

- Finding 1: Results of the FRAU assessment indicate that CELA represents a medium low risk to CIDA.
- Finding 2: CELA's financial systems are set up to respond to their major funder.
- Finding 3: CELA's financial systems are adequate for occasional project work. However, if it decides to move to more project oriented work (eg. program funding) its financial systems will need to accommodate this shift..
- Finding 4: Procedures for obtaining financial reports from overseas partners are in the process of being developed.
- Finding 5: The board adequately represents a range of qualified people with experience in environment, international development, and management.
- Finding 6: While CELA communicates it's work to the general public, it is not an organization with a general membership.
- Finding 7: International programming is a small but evolving aspect of CELA's activities, while reviewing progress of the international work it is not the central preoccupation.
- Finding 8: CELA has gone through various aspects of strategic planning and management but does not have a formalized strategy to guide its international activities.
- Finding 9: Board members are involved and informed of CELA's international activities at a degree they want
- Finding 10: CELA staff has adequate past experience in international work, and is gaining valuable experience through it's work with CIDA and others.
- Finding 11: Funding for formal staff development is low, however the nature of the work offers informal and non-formal training and development opportunities.
- Finding 12: The incentive system for international staff, which has until now been based on short term projects, might be strengthened by program funding.
- Finding 13: The cost and benefits of international programs are informally rather than formally assessed.
- Finding 14: CELA is linked to major provincial, national and international networks involved in advocating for sustainable development.
- Finding 15: CELA's overseas partner and overseas projects support CELA's mission.
- Finding 16: CELA's project plan has clear objectives, outputs, results and indicators that can be monitored and translated into a results based approach which has been adopted by CIDA.
- Finding 17: CELA has selected a partner that can be accountable for its project activities.
- Finding 18: By viewing both the partnership and the project as one of mutual learning and development, CELA contributes to it's overseas partner's capacity to improve the work it does in communities.
- Finding 19: The exploratory phase between CELA and its partner has been characterized by visits and various contacts all of which seem to point to a successful relationship.
- Finding 20: While no formal gender policy exists, women are fully integrated into all aspects of the organization and its projects.
- Finding 21: The structure of CELA's project and partnership suggests a sustainable approach to environmental management.
- Finding 22: The organizational culture of CELA supports program learning.
- Finding 23: While CELA's work in relation to OLAP has been institutionally evaluated, no formal evaluation of its international activities has been undertaken yet.

Finding 24: CELA and its partners disseminate the lessons learned from CELA's international activities.