



# **Project Implementation Report**

(1 July 2021 – 30 June 2022)

Project Title:	Making polychlorinated biphenyls management and
Project ritie.	elimination sustainable in Morocco
GEF ID:	9916
UNIDO ID:	170117
GEF Replenishment Cycle:	GEF-6
Country(ies):	Morocco
Region:	AFR - Africa
GEF Focal Area:	Chemicals and Waste (CW)
Integrated Approach Pilot (IAP) Programs <sup>1</sup> :	Not applicable
Stand-alone / Child Project:	Stand-alone
Implementing Department/Division:	ENV / IPM
Co-Implementing Agency:	Department of the Environment
Executing Agency(ies):	UNIDO
Project Type:	Medium-Sized Project (MSP)
Project Duration:	36 months
Extension(s):	2 extensions
GEF Project Financing:	1,826,484 USD
Agency Fee:	173,516 USD
Co-financing Amount:	5,700,500 USD
Date of CEO Endorsement/Approval:	10/19/2017
UNIDO Approval Date:	1/11/2018
Actual Implementation Start:	1/19/2018
Cumulative disbursement as of 30 June 2022:	1,256,425.29 USD
Mid-term Review (MTR) Date:	NA
Original Project Completion Date:	1/19/2021

<sup>&</sup>lt;sup>1</sup> Only for **GEF-6 projects**, if applicable

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Project Completion Date as reported in FY21:	1/19/2022
Current SAP Completion Date:	1/19/2023
Expected Project Completion Date:	1/19/2024
Expected Terminal Evaluation (TE) Date:	3/31/2024
Expected Financial Closure Date:	3/31/2025
UNIDO Project Manager <sup>2</sup> :	Mr. Alessandro AMADIO

# I. Brief description of project and status overview

#### **Project Objective**

The main objective of the proposed project is an integrated approach to the safe elimination of PCB-contaminated equipment, oil and wastes through strengthening of the legislation and tailored interventions targeting the small-scale industries and electricity distribution companies as a contribution to protecting human health and the soil and water ecosystems. Therefore, GEF funding will contribute to attainment of this objective building from the existent baseline.

Project Core Indicators		Expected at Endorsement/Approval stage	
5	Increase in phase-out, disposal and reduction of releases of POPs, ODS, mercury and other chemicals of global concerns	2.4 metric tons of pure PCB; 613 tons of PCB- contaminated equipment in-use and waste decontaminated	

#### **Baseline**

PCBs are widely present in Morocco as dielectric oil component inside transformers manufactured during the 1960s and 1970s of the last century, and as coolant in high quality transformers. As Morocco was not a PCBs producer, the manufacturers used to import pyralène, mainly from France, and from other countries for transformers manufactured locally. A large part of imported transformers contained PCBs such as pyralène or arochlor depending on their origin.

An issue of concern related to management of PCB-contaminated equipment in Morocco is the treatment of the oil in the transformers, due to the poor maintenance practices of technicians having little knowledge of PCBs management requirements, particularly those in the small-scale private sector unable to afford services of a specialized expert.

In 2009, a random sample of 100 transformers containing mineral oil (old and new), in-use at that time, was analyzed and results showed 31 percent of the transformers were contaminated with PCBs (>50 ppm).

In 2013, 6,000 old transformers (20 years+), some being in-use and others decommissioned, were analyzed in order to evaluate the extent of PCB contamination in Morocco. According to the results, after exclusion

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<sup>&</sup>lt;sup>2</sup> Person responsible for report content

of transformers contaminated with pure PCBs, 41 percent of the transformers were contaminated with PCBs (>50 ppm), among which 93 percent did have a relatively low level of contamination (<5000 ppm) and 7 percent shown a high level of contamination (>5000 ppm).

The continuous use of PCB-contaminated transformers, the issue of cross contamination in transformers with mineral oil, the unsafe disposal of the contaminated equipment when decommissioned, and soil pollution are the main causes of human exposure to PCBs in Morocco and are main contributors to global pollution.

The presence of a decontamination platform is an opportunity for the country to meet its targets in terms of PCBs elimination. The platform has the capacity to collect the PCB wastes and to pack them properly before expedition abroad for safe disposal. It has also the capacity to eliminate in-situ small concentration of PCBs in mineral oil through a dechlorination process. Since 2015, the platform is operational with all the necessary licenses and has a capacity to decontaminate about 100 tons of contaminated transformers per month (1,100 per year). The platform staff has been trained on standard security requirements and its functionality is already known of large-scale electricity companies.

The platform can significantly contribute to the PCB elimination targets of Morocco. Given its processing capacity, it is able to reduce or even eliminate the cross contamination and constitute a strategic site for export of heavily PCB-contaminated transformers, oil and other wastes generated by the decontamination process.

However, many of the PCB-contaminated equipment, even after decommissioning, remain in the country, including the most contaminated one, because the national platform is not operating efficiently and highly PCB-contaminated equipment are not adequately dismantled for export. Main risks related to the dismantling process are the spreading of the cross contamination and the pollution of soil and water ecosystems. As of now, there is no alternative solution to the dismantling process. Incineration is not permitted for oil containing more than 1 percent chlorine (Decree on incineration and co-incineration of hazardous wastes) and there is no landfill dedicated to dumping of hazardous wastes.

The Moroccan government and the majority of large-companies owning PCB-contaminated equipment are strongly committed to addressing the issue of PCB-contamination of transformers both in-use and after decommissioning.

Morocco ratified the Stockholm Convention on POPs in 2004 and accordingly developed a National Implementation Plan (NIP), the priority interventions of which are reflected in some parts of the existent legislation on wastes management. PCBs management have different requirements in the Morocco legislation depending on whether the equipment considered is in-use or considered as waste following decommissioning.

Concerning PCB-contaminated equipment still in-use, the government made the decision to proceed with their regulation rather than prohibition, and to have an approach centered on raising awareness of the owners in order to incentivize them having environmentally sound management practices of this equipment, including during their disposal at the end of their service life.

Conversely, PCB wastes are classified as hazardous waste by the Decree No. 2-07-253 on Classification of waste and establishment of a list of hazardous waste. Their management falls under the scope of the Law 28-00 adopted in 2009. The provisions on management of hazardous waste are in the Decree No. 2-14-85 that specifies requirements on organizational management of hazardous waste, the procedures for granting authorization of collection and transport of hazardous waste, and the authorization of specialized facilities to provide services of treatment, valuation, or disposal of hazardous waste

The absence of coercive measures to complement regulations on environmentally sound management of equipment in-use contaminated with PCBs, and the insufficient enforcement of the Law on waste management and disposal of PCB-contaminated transformers after decontamination have led to the lack of willingness of equipment owners to initiate the decontamination process in the platform. This has had an impact on the platform's activity and consequently on its profitability.

Please refer to the explanatory note at the end of the document and select corresponding ratings for the current reporting period, i.e. FY22. Please also provide a short justification for the selected ratings for FY22.

In view of the GEF Secretariat's intent to start following the ability of projects to adopt the concept of adaptive management<sup>3</sup>, Agencies are expected to closely monitor changes that occur from year to year and demonstrate that they are not simply implementing plans but modifying them in response to developments and circumstances or understanding. In order to facilitate with this assessment, please introduce the ratings as reported in the previous reporting cycle, i.e. FY21, in the last column.

Overall Ratings <sup>4</sup>	FY22	FY21
Global Environmental Objectives (GEOs) / Development Objectives (DOs) Rating	Satisfactory (S)	Satisfactory (S)

The project plans to achieve elimination of 250 tonnes of highly contaminated PCB oil and equipment, and the decontamination of 220 tonnes of low contaminated oil. GEOs IDOs rating is satisfactory. Evaluation has not changed since FY 2021

Implementation Progress (IP) Rating	Moderately Satisfactory (MS)	Moderately Satisfactory (MS)
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Project has suffered some delays in the selection of partners, but is progressing steadily towards its objective

Overall Risk Rating	Low Risk (L)	Low Risk (L)

Project partner for PCB elimination and decontamination. The risk of not meeting the Project objective is low. It was evaluated low in FY 2021

<sup>4</sup> Please refer to the explanatory note at the end of the document and assure that the indicated ratings correspond to the narrative of the report

<sup>&</sup>lt;sup>3</sup> Adaptive management in the context of an intentional approach to decision-making and adjustments in response to new available information, evidence gathered from monitoring, evaluation or research, and experience acquired from implementation, to ensure that the goals of the activity are being reached efficiently

# II. Targeted results and progress to-date

Please describe the progress made in achieving the outputs against key performance indicator's targets in the project's **M&E Plan/Log-Frame at the time of CEO Endorsement/Approval**. Please expand the table as needed.

Please fill in the below table or make a reference to any supporting documents that may be submitted as annexes to this report.

Project Strategy	KPIs/Indicators	Baseline	Target level	Progress to-date			
	Component 1 – Strengthening the regulatory framework for chemicals management focusing on PCBs and compliance incentive measures						
Outcome 1: Conducive environmentive mechanisms	ronment for safe man	agement of chemicals, v	with focus on PCBs, su	pported by			
Output 1.1: Law on management of chemicals including equipment in-use is finalized	# of laws related to PCBs submitted to approval / approved	There is no general law for the managment of chemical. The law on chemical is still in draft stage.	The law on chemicalsis finalized and submitted for approval	Provisions related to PCB waste incorporated into national law on industrial waste. Under discussion by parliament for publication by December 2022  Target reached			
Output 1.2: Regulations for PCBs secure management and elimination are improved	# of regulation related to PCBs submitted to approval/approved	Regulations need to be limiked to the provision of the law onhazardous wastes and to the upcoming law coverting managment of chemicals in-use.	The regulations on PCBs are developed and submitted to approval	PCB waste: publication of the decree oncollection, transport, storage, treatment and disposal of polychlorinated biphenyl (PCB) waste in the Official Bulletin (BO) N° 70 58, of the Minister for Energy Transition and Sustainable Development on January 20, 2022  Draft decree on the restriction of importation of PCB-contaminated equipment developed, approved by Ministry of Trade and Industry for official publication and in the process of being officially published.			
				Target reached			
Output 1.3: New incentive mechanisms are developed to facilitate compliance with the legislation	# of new institutional and/or financial mechanisms developed and implemented		New incentive schemes (at least 2) are set up.	National PCB management plan developed by the Project validated during the meeting of the national commission held on November 15, 2021  National PCB inventory developed in 2021 and approved during the meeting of the national commission held on November 15, 2021  Report on financial incentives and partnership for PCB management developed validated during the meeting of the national commission held on November 15, 2021 in xx and approved on xx  In addition to the above, a study on sustainable management of PCB, including a co-incineration test in a cement kiln, was launched by the Project in Q2 2022. Results will be available by Project completion and will pave the way for a cost-effective organization of the value chain			

				Target reached			
Component 2 – Promoting th	ne adoption of PCBs	safe management pract	ices				
Outcome 2: Environmentally	Outcome 2: Environmentally sound management of PCBs-contaminated equipment, waste and oil						
Output 2.1: 20,000 PCB- contaminated transformers in participant companies are screened /analyzed;	# of PCB- contaminated equipment screened	Any small-scale industry reports on PCB contaminated equipment.	20,000 screening tests and analysis of PCBs in equipment completed	Following the signature of a contract with the OKSA Laboratory in April 2020 for the analysis of 1000 transformers. 1008 transformers were analysed.			
			A database of the PCB-contaminated equipment in the small-scale private sector is available	The financial remainder of the contract will be reserved for additional analyses during the last quarter of 2022.  Target reached			
Output 2.2: Environmentally sound management practices are documented and disseminated among transformers' owners as technical guidance	adopting best PCBs	Inventory of owners of contaminated equipment in the small-scale private sector not finalized.  Few compagnies in small-scale private sector have BAT and BEP on managment of PCB contaminated equipment.	At least 39 companies adopt best PCBs management practices	Training documents on the sound management of PCBs were developed and shared with 249 participating companies through 7 regional workshops conducted between January 2020, the last workshop was held in Agadir on November 24 and 25, 2021. and November 2021 249 people were trained throughout these 7 regional workshops, with 55% female participation rate.  The last planned workshop was organized on November 24 and 25, 2021 in Agadir in the Souss Massa region, with a participation rate of 45 companies, including 31% women.  Inventory of equipment contaminated with PCBs was finalized in October 2021  6 meetings with PCB owners (CN, Steering Committee, 2 meetings with CGEM Agadir Target reached			
Output 2.3: 39 companies participate to trainings on BAT and BEP in ESM of PCBs	sessions	No training on BAT and BEP in environmentally sound managment of PCB target small-scale private sector.	At least 2 training sessions on BAT and BEP practices;  39 companies participate to training sessions (at least 30% of companies representatives are female)	179 industries owning transformers participated in the 7 workshops carried out, 40% of whom were women.  The 7 regional workshops organized are also considered astraining dayson good practices with the support of the technical expert  Good practice guide developed  Capacity building of the Laboratory of the Department of Sustainable Development on PCB analysisis ongoing.  Equipment: signature of a purchase order with REACTING on January 14, 2022 for the acquisition of a GCMS and sampling equipment for PCB analysis in oil from contaminated transformers Equipment should be delivered by Q4 2022.  Capacity-building will include a technical training on PCB analysis in oil on PCB-contaminated equipment, planned in Q4 2022 Capacity building will support the accreditation of the Laboratory			

				Target reached
Component 3 – PCBselimin	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	
Outcome 3: PCBs, in either		•	, <u>,                                   </u>	hthe decontamination platform
Output 3.1: 613 tons of PCB-contaminated equipment and 2.4 tons of pure PCB oils are sent abroad for safe elimination	contaminated equipment sent abroad for safe disposal  Quantities of pure	equipment.	613 tons of highly PCB-contaminated, transformers are decontaminated; 2.4 tons of pure PCB oil from decontamination are sent abroad for safe elimination	Contract signed with Maroc Maintenance Environnement (MME) on September 29, 2020  • 81 transformers weighing approximately 97 tons were collected  • export agreement from the Department of Sustainable Development, granted on December 7, 2021.  • 63 tonnes of PCB equipment and oil were exported for final elimination by Orion BV in the Netherlands.  250 tonnes of PCB oil and contaminated equipment should be eliminated by the end of the Project.  Ongoing
Output 3.2: 1,740 transformers with 541 tons of dielectric oils are locally decontaminated	#of transformers decontaminated	1740 contaminated transformers still inuse have been localized.	1,740 transformers are decontaminated; 541 tons of dielectric oils are decontaminated;	After an unsuccessful first call for tenders, in consultation with the Ministry of Energy Transition and Sustainable Development, an agreement was found with project partner MME for the local decontamination of 220 tonnes of PCB, using the national PCB decontamination platform.  Contract for execution for services will be signed with MME in Q3 2022  Ongoing
Output 3.3: Public outreach Strategy to promote Morocco's experiences of PCB platform	website on the operation of the platform  # of PPT presentations on the platform experiences in regional meetings	contaminated equipment owners do not use it.  89 highly contaminated transformers still in- use have been localized.  188 decommissioned transformers have beenlocalized.	3 posts in the website on the decontamination platform 3 PPT presentations on the experiences of the platform	The experience of the Moroccan PCB platform was shared during the meetings and awareness workshops organized in Morocco. Since the beginning of the project near 200 communication materials (leaflets, brochure etc) were distributed containing guides to good practice, Two leaflets in Arabic and French version on "Management safety of PCBs in Morocco" and a note on the Program the achievements of the first and second phase were developed.  Communication on the platform was made during 3 events in 2022: including an international waste fair and a visit of the delegation from the Gulf and Middle East countries.  Good practice guides and PPT presentations have been developed and distributed during a workshop in Agadir, the Tangier international fair and the visit of the Delegation
Component 4 – Monitoring, r	reporting and evalua	tion		
Outcome 4: Effective and eff	icient implementatio	n of the project based or	n GEF and UNIDO requ	uirements
Output 4.1: Project results regularly monitored and reported (PIRs)	Project Steering Committee (PSC) established Project Management Unit (PMU) with each member's responsibility		PIRs are submitted annually (3 in total) GEF Tracking tool is submitted after project termination	Since the start of the project, 3 meetings of the project steering committee and 4 meetings of the National PCB Commission have been organized

	clearly described in job descriptions  Project progress monitored and work plan prepared and updated		PIRs are submitted each year and monthly reports are sent to UNIDO HQ for close monitoring.
Output 4.2: Independent Terminal Evaluation conducted		terminal evaluation report	Cluster independent terminal evaluation for PCB projects planned in Q4 2022

# III. Project Risk Management

**1.** Please indicate the <u>overall project-level risks and the related risk management measures</u>: (i) as identified in the CEO Endorsement document, and (ii) progress to-date. Please expand the table as needed.

Describe in tabular form the risks observed and priority mitigation activities undertaken during the reporting period in line with the project document. Note that risks, risk level and mitigations measures should be consistent with the ones identified in the CEO Endorsement/Approval document. Please also consider the project's ability to adopt the adaptive management approach in remediating any of the risks that had been <u>sub-optimally</u> rated (H, S) in the previous reporting cycle.

	(i) Risks at CEO stage	(i) Risk level FY 21	(i) Risk level FY 22	(i) Mitigation measures	(ii) Progress to-date	New defined risk <sup>5</sup>
1	Institutional risk: There might be delays in the finalization and enactment of legislation under development	Medium	Medium	The project will take advantage of the momentum created by the COP 22 to have the PCB Commission involve parliamentarians in passing the finalized law and the subsequent regulations (decrees of application). This should be supported by a strong involvement of the key Ministerial department members of the PCBs Commission and through workshops and training activities.	On track.	
2	Institutional risk: Change on the top management of the governmental bodies could result on delays in the implementation of the project	Low	Low	The Steering Committee (National Commission of PCBs) communication and networking will ensure the necessary support of the institutions concerned, regardless of persons with whom agreements have been included.	On track The national Project Management Unit was established and recruited by UNIDO instead.	
3	Financial risk: Mobilization of the government financial contribution and other cofinanciers takes longer causing delays in the implementation	Low	Low	The commitments of and agreements with some major stakeholders such as ONEE, LYDEC, RADEEF, OCP, AMENDIS, REDAL (ref. Annex H) will be materialized as soon as the project starts. They represent the major part of the PCB contaminated equipment owners. This will incentivize other stakeholders to get engaged.	On track.  Partnership agreements are being prepared and are being reviewed with potential holders.	
4	Market risk: Low level of commitment of other private stakeholders	Medium	Medium	Commitment of the private sector, which is not a direct participant to the project activities, will be ensured through the dissemination of the investment component achievements, the availability of environmental management plans, and the enforcement of law and regulations.	On track. Strong adhesion of potential holders, and weakfor small industrial holders	
5	Technical risk: Local expertise is limited for an effective implementation of practices related to an environmentally sound management of PCBs	Medium	Medium	The project will mobilize the existent national and international expertise to assist the national project team in providing support to PCB-contaminated equipment owners. In addition, the project will rely on the experience gained with the existent national PCBs decontamination platform.	The existing national PCB decontamination platform is ready and export highly contaminated PCB waste for final elimination abroad	

<sup>&</sup>lt;sup>5</sup> New risk added in reporting period. Check only if applicable.

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			The national PCB decontamination platform will be used for local decontamination of 220
	1		tonnes of PCB. Contract should kick-start by Q3 2022.
			The opportunity of eliminating PCBs by co-incineration in cement kilns will be assessed in a study in progress, undertaken by the Project.
actions taken since then to on reasons that may have it	mitigate the relevant r mpeded any of the su	ng (H, S) in the previous reportir isks and improve the related risk raub-optimal risk ratings from improx xt reporting cycle to remediate thi	ating. Please also elaborate wing in the current reporting
NA			
General delay in the exec which started from March Easing of health measure - finalizing PCB analysis of - All regional awareness ra - meetings with the PCB O	ution of program acti 2020 (More than 4 m s in 2021 enabled: campaign with a local aising workshops org Commission and the S	contractor, for completion of a nat	ement period in Morocco,
4. Please clarify if the proje	ct is facing delays an	d is expected to request an <b>exter</b>	nsion.
abroad for final elimination	n. The project has fa	ze local decontamination of PCB ced delays with the procurement nated up to 2000ppm should start	process and activities for
<b>5.</b> Please provide the <b>mai</b> actions taken towards the r	_	ommendations of completed M luded in the report.	ITR, and elaborate on any
N/A			

# IV. Environmental and Social Safeguards (ESS)

UN	I. As part of the requirements for projects from GEF-6 onwards, and based on the screening as per the JNIDO Environmental and Social Safeguards Policies and Procedures (ESSPP), which category is the project?						
	Category A project						
$\boxtimes$	Category B project						
	Category C project						
(Bv	selecting Category C, I confirm that the E&S risks of the project have not escalated to Category A or B).						

#### Notes on new risks:

- If new risks have been identified during implementation due to changes in, i.e. project design or context, these should also be listed in (ii) below.
- If these new/additional risks are related to Operational Safeguards #2, 3, 5, 6, or 8, please consult with UNIDO GEF Coordination to discuss next steps.
- Please refer to the UNIDO <u>Environmental and Social Safeguards Policies and Procedures</u> (ESSPP) on how to report on E&S issues.

# Please expand the table as needed.

	E&S risk	Mitigation measures undertaken during	Monitoring methods and procedures
		the reporting period	used in the reporting period
(i) Risks identified in ESMP at time of CEO Endorsement	Delay in the enactment of legislation	Take advantage of the momentum created by COP 22 so that the PCB Commission involves parliamentarians in the adoption of the law and regulations (implementing decrees):  -As part of the update of the waste law 28.00, modifications relating to PCBs have been added and under discussion in parliament, and a draft decree has been drawn up for waste containing PCBs.  The PCB Commission created by COP22 validated the draft decree and published on January 20, 2022 in Official Bulletin (BO) N° 70 58, of the decree of the Minister for Energy Transition and Sustainable Development, setting the specific requirements relating to the collection, transport, storage, treatment and disposal of polychlorinated biphenyls (PCB) waste,  - A draft decree has been drawn up and validated by the PCB commission, restricting the import of equipment containing PCBs, in accordance with the law on foreign trade. This draft decree was sent by the minister to the ministry responsible for trade and industry for publication.	Follow the invoice process in the legal approval system:  The new waste law is currently under discussion with Parliament.  Pursue contacts with the Minister in charge of Trade and Industry to speed up the publication of the decree restricting the import of PCB equipment.

	Contamination of air and soil near the decontamination facility	All the platform installation systems including ventilation of the ambient environment, collection and water networks, management of aqueous, gaseous and solid discharges, etc. have been designed in such a way as to avoid discharges to the exterior of the installation.  For the moment, the elimination operations have started and the treatment operations planned in this phase have not yet started.  Ongoing process	The platform exists and has been regularly maintained and operates according to measures using technologies to prevent environmental risks  Make sure the facility is fully sealed and has a containment barrier to prevent water or soil contamination.  When storage operations started, a risk management plan related to air and soil pollution was put in place to avoid any type of pollution. A similar plan is required for starting processing operations.
	Threat on health of the decontamination facility workers	Disposal operations have started and the systematic use of personal protective equipment (PPE), mandatory for all employees, and air treatment to prevent contaminated dust from leaving the site.  The treatment operations planned in this phase have not yet started, the protection of personnel by PPE is required for the service providers who will tender for this operation.  The verification system is implemented in accordance with the national regulations in force, and by the monitoring committees.	When starting operations, it is necessary to put in place a risk management plan related to worker health and medical reports and to ensure that all workers are informed. The use of PPE is necessary during operations.  Additional protocols and measures have been put in place against the spread of the coronavirus (COVID 19).
	Financial contribution of the government and other co-financing are slow to be put in place causing delays in the implementation	It has been insured that he major potential owners, owners of equipment contaminated with PCBs, showed their commitments from the start of project activities, such as ONEE, LYDEC, RADEEF, OCP, AMENDIS, REDAL, and also the federations of industrialists who represent the small holders.  This will incentivize other stakeholders to get engaged.	14 meetings and 7 regional awareness raising events were held and demonstrated the commitment of stakeholders.  The meetings with the National PCB Commission and the last sensitization seminar as well as the participation of the PCB Project in the international exhibition on waste have demonstrated the commitment of the parties concerned.
	Change on the top management of the governmental bodies could result in delays in the implementation of the project  Local expertise too limited for an effective participation to the	Ensure the continuity of the implementation of the project through continuous communication with the PCB commission and the holders and partners.  The project management unit is assisted by national and international experts to provide support to the owners of contaminated equipment	Monitoring of activities The recruitment of the coordinator by UNIDO and the national project management unit ensures the continuity of the planned actions  Monitoring of activities A specific training program was carried out on the secure and sustainable management of PCB equipment and
	implementation of environmentally sound management of PCBs Low level of private stakeholders commitment	Commitment of the private sector to the project activities will be ensured through the dissemination of the investment component achievements, the availability of environmental management plans, and the enforcement of law and regulations.	the promotion of the existing national equipment processing platform.  Monitoring of activities
(ii) New risks identified during project implementation (if not applicable, please insert 'NA' in each box)	Delay in the execution of project activities within the deadlines due to the period of confinement in Morocco (COVID19) from March 2020 to June 2021.	Ensure the continuity of activities such as the finalization and adoption of legal documents, the ongoing transformer analysis campaign, the removal and treatment operations of transformers, and the development of a draft agreement with PCB-ownersfor sustainable PCB management.	Constant communication with stakeholders, PCB-owners and project partners  Meetings and seminars held either in through visual platforms of face-to-face, in accordance with health measures adopted by the Government.

Sanitary risk of the personnel involved in the project due to the current COVID19 pandemic	Ensure that appropriate measures are in place to avoid contamination among personnel during daily work, meetings, workshops, etc.:  - Ensure that individual protection (masks) are used during movement in public buildings  - Ensure that soap and cleaning product are available at the entrance of building  - Ensure that social distancing is respected (at least 1 m) during meetings  - Encourage teleworking  - Ensure, in the event of face-to-face meetings, that the maximum number of persons authorized and the conditions of the meeting places are respected, in particular, in the case of meetings, seminars or meetings.	Inform participants to meetings of the sanitary protocol through:  - Emails, - Poster/bill at entrance of buildings and meeting rooms - Recall the rules at the beginning of meetings - Have some personnel designated to check if rules are respected and recall them to personnel and participants if necessary.
Difficulties is implementing control and monitoring of PCB collection, treatment and elimination	A monitoring and supervision committee was created to monitor operations from selected partner MME.	Frequent site visits and controls by the monitoring and supervision committee.  Monthly site visits by the national project coordinator
Lack of adequate capacities of the National Laboratory for monitoring and control (sampling and analysis)	A capacity building program was developed for the National Laboratory of the Department of the Environment	Procurement of equipment for PCB analysis and subcontract signed to deliver technical training on PCB analysis

## V. Stakeholder Engagement

1. Using the previous reporting period as a basis, please provide information on **progress**, **challenges** and **outcomes** regarding engagement of stakeholders in the project (based on the Stakeholder Engagement Plan or equivalent document submitted at CEO Endorsement/Approval).

All stakeholders respected their commitments, as mentioned in the project documents. A Convention for sustainable PCB management highlighting responsibilities and obligation of the Ministry of Environment and PCB-owners is being discussed with key representatives from the private sector. The Ministry of Environment is adequately supporting the control and monitoring of PCB elimination in the country.

**2.** Please provide any feedback submitted by national counterparts, GEF OFP, co-financiers, and other partners/stakeholders of the project (e.g. private sector, CSOs, NGOs, etc.).

The visit of the official delegation of the Gulf and Middle East countries to the PCB platform in Bouskoura, on June 29, 2022, showed the interest of the Arab countries in this project, strongly supported by the GEF and UNIDO. Delegates expressed their great wish to strengthen South-South cooperation and to benefit from the Moroccan experience and the transfer of know-how on sustainable management of PCBs.

Also, the participation in the Recycling and Waste Management Fair, organized in Tangier in June 2022 was an opportunity for the Project to raise awareness on the health and environmental impact of PCBs and to share successful results achieved.

International cooperation agencies such as USAID and Japan and representatives of African countries such as Senegal expressed their strong interest in the Project during this international fair.

In his speech, during the last visit made on January 29, 2021 to the platform à Bouskoura, the Minister of Energy and Mines and the Environment, commented the efforts undertaken by the various stakeholders for the success of this project, which is strongly supported by the GEF and UNIDO in particular for the establishment of the first platform in Morocco and in Africa. The Minister recalled that Morocco's objective is to respect the Stockholm Convention and also to make the management of PCBs in Morocco Sustainable by strengthening the legal framework and the establishment of sustainable incentive mechanisms.

During the numerous awareness raising events and training sessions organized by the Project, stakeholders and PCB-owners expressed their satisfaction with the technical assistance provided by the Project.

3. Please provide any relevant stakeholder consultation documents.

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9916 Report meeting 14.09.2021
9916_Report_meeting_on_the inventory__21.09.2021
9916_Report_meeting_with_LABOVOLTA_laboratory_30.09.2021
9916 Report meeting of the National Commission 11.11.2021
9916_Report_meeting_of_the_Project_Steering_Committee_11.11.2021
9916 Report Agadir workshop 24 & 25.11.2021
9916_Report_meeting_with_MME_company 21.01.2022
9916_Report_ meeting_13.01.2022
9916 Report PMT with the ImpactPlus Office 24.05.2022
9916 Report meeting with MME company and visit of the Platform 25.05.2022
9916 Report meeting National PCB Commission 26.05.2022
9916 Report meeting with cement company Geocycle 09.06.2022
9916_Report_International_Recycling_and_Waste_Management_Fair_Tangier_22 to 25.06.2022
9916_Report_meeting__MME Company_27.06.2022
9916 Report meeting PMT with RADEEMA 30.06.2022
9916_CR_of_the_UGP_Geocycle_meeting_PCB_sector_study_June_09, 2022_VF
9916 Report meeting national commission 24-09-2020
9916 Report steering committee 29.09.2020
9916 Report meeting laboratory sampling campaign 05.11.2020
9916 Report regional workshop Fes 26 & 27-11-2020
9916 Report regional workshop Marrakech 17 et 18.12.2021
9916 Report meeting PCB owners February 2021
9916 Report of the regional awareness workshop Oujda 30.06.21
```

#### VI. Gender Mainstreaming

1. Using the previous reporting period as a basis, please report on the **progress** achieved **on implementing gender-responsive measures** and **using gender-sensitive indicators**, as documented at CEO Endorsement/Approval (in the project results framework, gender action plan or equivalent),.

In accordance with the Moroccan constitution and international requirements, the PCB program ensures the protection of women from the risks associated with PCBs throughout the process.

During the awareness and information activities against the risks of PCBs, 935 people were sensitized, including 400 women, which constitutes a percentage of 43% of women, who participated in the information and awareness seminars, and who belong to the different target groups (holders, laboratory, private sector and public sector).

Please find attached the reports of the seminars with the gender approach.

## VII. Knowledge Management

1. Using the previous reporting period as a basis, please elaborate on any **knowledge management activities** / **products**, as documented at CEO Endorsement / Approval.

The PCB Program aims to strengthen capacity and knowledge of owners of contaminated equipment and public stakeholders on PCB management. Technical training is frequently delivered in bilateral meetings, regional workshops and additional training activities with private companies. The following training material, awareness-raising content and technical reports were developed by the Project:

- Inventory of PCB in Morocco, relying on sampling campaign, data on transformers and technical expertise to extrapolate results
- Results of sampling campaign on over 1000 sampling of oil in transformers
- Draft decrees and a bill for sound PCB management. 1 decree on PCB waste has been endorsed and published by the Government of Morocco
- Environmentally sound management training program,
- Good practices communication material,
- Draft convention with MoE and PCB owners for sustainable decontamination of contaminated equipment,
- PCB management plan
- Protocol for co-incineration of PCB in cement kilns

## 2. Please list any relevant knowledge management mechanisms / tools that the project has generated.

- 9916\_ decree\_restriction\_imports\_PCB
- 9916\_bill\_PCB\_management
- 9916\_Decrees\_French\_Version\_on\_PCB\_waste\_January\_20, 2022 BO\_7058\_Fr
- 9916\_Decrees\_Arab\_Version\_on\_PCB\_waste\_January\_20, 2022 BO\_7058\_Ar
- 9916\_Draft\_PCB\_Test\_Protocol\_Incineration\_of\_PCB\_oils\_in\_cement\_works
- 9916\_National\_PCB\_Elimination Plan Report 2022
- 9916 PCB inventory
- 9916\_Final\_report\_PCB\_analysis
- 9916 Report on Incentive Mechanisms for the elimination of PCBs final
- 9916 PCB Good Practice Guide Arabic version
- 9916 PCB Good Practice Guide French Version
- 9916\_Roll\_up\_PCB\_Program\_Arabic\_Version
- 9916\_Roll\_up\_PCB\_Program\_French\_Version
- 9916\_PCB\_Program\_Note\_Arabic\_and\_French\_Version
- 9916 Roll up PCB Program French Version

- 9916\_Arabic\_PCB\_presentation\_Visit\_of\_the\_Gulf\_countries\_delegation\_to\_the\_MME\_platform\_ 29.06.2022
- 9916 certificate of disposal orion b.v export of pcb equipment
- 9916\_Presentation\_PPT\_Design\_office\_CN\_26.06.2022\_ethodology\_PCB\_sector\_study
- 9916\_Presentation\_PPT\_PCB\_CN\_May 26, 2022
- 9916\_Presentation\_PPT\_Salon\_Tangier\_24.06.2022\_PCB
- 9916 Cardboard PCB
- 9916\_Flyer FR\_PCB
- 9916\_Flyer AR\_PCB
- 9916\_Rollup\_PCB FR-AR
- 9916 Video PCB
- 9916 Awareness workshop presentation phase 1
- 9916\_ Awareness\_workshop\_presentation\_phase\_2
- 9916\_ Awareness\_workshop\_presentation\_MME\_
- 9916\_Awareness\_workshop\_presentation\_health\_impact\_PCB
- 9916\_ Awareness\_workshop\_presentation\_PCB\_regulations
- 9916\_PCB\_decontamination\_progress\_reports\_
- 9916 Decree restriction imports PCB
- 9916\_bill\_PCB\_management
- 9916 ESM training material
- 9916\_Draft\_convention\_PCB\_owners
- 9916\_Health and safety plan PCB elimination
- 9916 Accidents prevention and emergency management plan PCB

# VIII. Implementation progress

1. Using the previous reporting period as a basis, please provide information on **progress, challenges and outcomes achieved/observed** with regards to project implementation.

The COVID 19 pandemic and related restrictions have delayed the implementation of program activities. Despite the difficulties, the project activities continued in accordance with the new measures imposed and according to the possibilities:

- Legal texts on PCB management have been finalized.
- During the reporting period, selected laboratory Oksa has carried out the sampling and analysis of 1000 transformers, hitting project KPI
- 7 awareness raising workshops were organized in major regions of Morocco
- Delivery of equipment for analysis of PCB in contaminated oil from transformers is underway to strengthen capacities of the Laboratory of the Department of the Environment. Training will be carried out in 2022.
- 97 tonnes of contaminated PCBs have been collected with the use of the national PCB decontamination platform. 63 were sent abroad and eliminated
- A study on the sustainable of PCB management operations in Morocco, including potential for coincineration in cement kilns is underway
- Local decontamination of 220 tonnes of PCB should kick-start in Q3 2022

**2.** Please briefly elaborate on any **minor amendments**<sup>6</sup> to the approved project that may have been introduced during the implementation period or indicate as not applicable (NA).

<sup>&</sup>lt;sup>6</sup> As described in Annex 9 of the *GEF Project and Program Cycle Policy Guidelines*, **minor amendments** are changes to the project design or implementation that do not have significant impact on the project objectives or scope, or an increase of the GEF project financing up to 5%.

Please tick each category for which a change has occurred and provide a description of the change in the related textbox. You may attach supporting documentation, as appropriate.

Results Framework	N/A
Components and Cost	N/A
Institutional and Implementation Arrangements	N/A
Financial Management	N/A
Implementation Schedule	2 extensions granted to the project
Executing Entity	N/A
Executing Entity Category	N/A
Minor Project Objective Change	N/A
Safeguards	N/A
Risk Analysis	N/A
Increase of GEF Project Financing Up to 5%	N/A
Co-Financing	N/A
Location of Project Activities	N/A
Others	N/A

## 3. Please provide progress related to the financial implementation of the project.

All the activities related to the strengthening of the legal and institutional framework for the sound management of PCBs were carried out under result 1 mainly for national expertise (budget line 17). The deliverables have been validated by the National PCB Commission and sent for publication.

Concerning result 2, an update of the National inventory has been conducted, with the support of a national laboratory (budget line 21).

Regarding output 2.2: equipment for PCB analysis has been procured and technical training for the staff of the Department of the Environment laboratory is scheduled for the third quarter of 2022 (budget line 21). Training and awareness-raising was successfully carried out for owners of transformers, with the support of a national expert (budget line 17). In addition, a contract was awarded to a local technical firm for the development of a study on sustainable PCB management (budget 21). The study will ensure the sustainability of PCB management and of the national platform beyond project completion.

Concerning output 3.1: Subcontract for the elimination of 250 tonnes of highly contaminated PCBs was awarded to MME in 2022 and operations are underway (budget line 21),

Regarding output 3.2: a subcontract for project partner MME will be signed in 2022, for the local decontamination of 220 tonnes of low contaminated PCBs (budget line 21).

UNIDO	PROJECT DELIVER		STO	CKHOLM CONVEN S IN MOROCCO	TION ON						
Reporting Period:	18.01.2018 - 30.08.2022 Project Theme:		ne: Ener	gy and Environment	nment Country:		Norocco Region		Africa Ar	Africa Arab States	
Sponsor Nr.	Sponsor		Grant	Gran	t Description	Fur	nd	Currency Gr	ant Status	Grant Va	alidity
400150	GEF - Global Environment Facility		2000003826	MOR	OCCO_POLYCHLO	ORIN GF		USD Au	thority to implement	19.01.20	18 - 19.01.2023
						_					
	Description	Released Budget Current Year (a)	Obligations Current Year (b)	Disbursement Current Year (e)	Expenditures Current Year (d=b+o)		Release ent Budge (e) (f)			Support C	out Expenditure ()=g+l)
2000003828											
170117-1-02-01	1.1.Conductive environment and Incentives	USD	USD	USD	USD	USD	USD	USD	USD	USD	USD
1100	Staff & Intern Consultants	428.40	0.00	0.1	00 0.	00 11,5	00.00 11,5	00.00 11,0	71.60 428	3.40	0.00 11,071
1500	Local travel	441.77	0.00	0.1	00 0.	00 2,5	00.00 2,5	00.00 2,0	58.23 441	1.77	0.00 2,058
1700	Nat Consult / Staff	8,737.40	0.00	0.1		_			62.60 8,737		0.00 14,762
2100	Contractual Services	4,696.62	81.13	0.1			23,		84.51 4,619		0.00 34,384
3000	Train/Fellowship/Study	2,797.84	0.00	(0.4	-, (	-2/	20,00		01.67 2,796	-	0.00 23,201
4500	Equipment	92.00	633.90	0.1					41.90 (541	/	0.00 42,041
5100	Other Direct Costs	2,283.38	0.00	0.1		_			66.59 2,283		0.00 1,666
9300	Support Cost IDC	0.00	0.00	0.1		00	0.00	0.00		-	72.81 12,272
170117-1-02-01	Total	18,477.41	716.03	(0.4	8) 714.	.64 147,8	48.87 147,8	49.97 129,1	87.10 18,762	12,2	72.81 141,468
170117-1-02-02	1.2. ESM of PCB-oil, e	USD	USD	USD	USD	USD	USD	USD	USD	USD	USD
1100	Staff & Intern Consultants	5,817.93	0.00	0.1	00 0.	00 10,5	00.00 10,5	00.00 4,6	82.07 5,817	1.93	0.00 4,682
1500	Local travel	6,631.41	3,573.80	0.1	00 3,573.	.80 7,5	00.00 7,5	00.00 4,4	42.39 3,057		0.00 4,442
1700	Nat Consult / Staff	3,377.39	10,833.42	13,932.0	06 24,765.	48 35,4	00.00 35,4	00.00 56,7	88.09 (21,388	.09)	0.00 56,788
2100	Contractual Services	12,780.90	(7,927.24)	7,598.	. ,				90.67 13,109		0.00 40,990
3000	Train/Fellowship/Study	1,736.06	(593.55)	(152.9	., ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,			17.45 2,482		0.00 10,117
3500	International Meetings	0.00	0.00	311.5			0.00		11.53 (311	/	0.00 311
4500	Equipment	5,000.00	0.00	0.1	-	-,-		00.00	0.00 5,000		0.00
9300	Other Direct Costs	2,329.19	0.00	80.6	-	.65 4,0	00.00 4,0	0.00 1,7	51.46 2,248		0.00 1,751
170117-1-02-02	Support Cost IDC Total	0.00 37 672 88	0.00 6,888.43	21,770.				00.00 119.0		11/10	13.11 11,313 13.11 130,396
1/011/-1-02-02	Total	37,672.88	6,886.43	21,770.	11 27,868.	128,1	00.00 129,1	00.00 118,0	83.96 10,016	11,3	13.11 130,396
170117-1-02-03	1.3. PCB elimination	USD	USD	USD	USD	USD	USD	USD	USD	USD	USD
1100	Staff & Intern Consultants	110.98	0.00	0.00	0.00	16,000.00		15,889.02	110.98	0.00	15,889.02
1500	Local travel	10,872.14	0.00	2,051.30	2,051.30	11,000.00		2,179.16	8,820.84	0.00	2,179.16
1700	Nat Consult./Staff Contractual Services	4,402.86 481,750.55	(26.782.41)	69.315.02	0.00 42 532 61	71,000.00	71,000.00	66,597.14 570,577.67	4,402.86 439,217.94	0.00	66,597.14 570,577.67
3000	Train/Fellowship/Study	8,899.01	0.00	0.00	0.00	10,000.00		1,100.99	8,899.01	0.00	1,100.99
4500	Equipment	92.00	633.89	0.00	633.89	41,500.00	41,500.00	42 041.89	(541.89)	0.00	42 041 89
5100	Other Direct Costs	12,423.51	0.00	0.00	0.00	15,484.00	15,484.00	3,060.49	12,423.51	0.00	3,060.49
9300	Support Cost IDC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	66,637.51	66,637.51
170117-1-02-03	Total	618,661.06	(28,148.62)	71,388.32	46,217.80	1,174,779.81	1,174,779.81	701,448.38	473,333.26	88,837.61	768,083.87
170117-1-51-02	Project management costs	USD	USD	USD	USD	USD	USD	USD	USD	USD	USD
1100	Staff & Intern Consultants	8,761.92	1,375.58	2,474.82	3,850.40	26,300.00	26,300.00	21,388.48	4,911.52	0.00	21,388.48
1500	Local travel	68.80	0.00	0.00	0.00	3,020.00	3,020.00	2,951.20	68.90	0.00	2,951.20
1700	Nat:Consult./Staff	64,530.88	27,620.11	26,833.44	54,453.55	261,216.98	261,216.98	251,139.65	10,077.33	0.00	251,139.65
2100	Contractual Services	3,800.97	0.00	0.00	0.00	4,400.00	4,400.00	599.03	3,800.97	0.00	599.03
3000	Train/Fellowship/Study	1,526.85	0.00	0.00	0.00	5,500.00	5,500.00	3,973.15	1,526.85	0.00	3,973.15
4500	Equipment	39.09	0.00	39.66	39.66	6,000.00	6,000.00	6,000.57	(0.57)	0.00	6,000.57
5100	Other Direct Costs	(687.03)	105.39	2,343.15	2,448.54	14,217.44	14,217.44	17,353.01	(3,135.57)	0.00	17,353.01
9300	Support Cost IDC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28,823.61	28,823.61
170117-1-61-02	Total	78,041.48	29,101.08	31,691.07	60,782.16	320,664.42	320,864.42	303,406.09	17,249.33	28,823.61	332,228.70
170117-1-63-01	Evaluation	USD	USD	USD	USD	USD	USD	USD	USD	USD	USD
1100	Staff & Intern Consultants	25,000.00	0.00	0.00	0.00	25,000.00	25,000.00	0.00	25,000.00	0.00	0.00
1500	Local travel	900.88	0.00	0.00	0.00	1,101.00	1,101.00	200.12	900.88	0.00	200.12
1700	Nat:Consult./Staff	8,899.00	0.00	0.00	0.00	8,899.00	8,899.00	0.00	8,899.00	0.00	0.00
3000	Train/Fellowship/Study	12,000.00	0.00	0.00	0.00	12,000.00		0.00	12,000.00	0.00	0.00
4500	Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5100	Other Direct Costs	3,897.04	0.00	0.00	0.00	7,000.00	7,000.00	3,102.96	3,897.04	0.00	3,102.96
9300	Support Cost IDC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	313.79	313.79
170117-1-53-01	Total	60,696.92	0.00	0.00	0.00	64,000.00	54,000.00	3,303.08	60,696.82	313.79	3,616.87

PROJECT DELIVERY REPORT

# IX. Work Plan and Budget

1. Please provide **an updated project work plan and budget** for <u>the remaining duration of the project</u>, as per last approved project extension. Please expand/modify the table as needed.

Please fill in the below table or make a reference to a file, in case it is submitted as an annex to the report.

Outputs by Project			GEF Grant Budget Available (US\$)						
Component	Q3			Q4					
Component 1 - Strength	ning the regulatory framework for chemicals management focusing on PCBs and								

compliance incentive me	compliance incentive measures						
Outcome 1: Conducive environment for safe management of chemicals, with focus on PCBs, supported by incentive mechanisms							18,762.87
Component 2 - Promotin	g the adop	tion of PCB	s safe man	agement p	ractices		
Outcome 2: Environmentally sound management of PCBs- contaminated equipment, waste and oil							10,016.34
Component 3 – Compone	ent 3 – PCB	s eliminatio	on and pron	notion of A	Africa's fire	st PCB de	contamination platform
Outcome 3: PCB in either equipment in-use of decommissioned, are safely eliminated through the decontamination platform							473,333.25
Monitoring and Evaluation							50,696.92
Project Management							17,249.33

# X. Synergies

# 1. **Synergies** achieved:

The Project is integrated to the UNIDO Programme Country Partnership approach for Morocco

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#### **EXPLANATORY NOTE**

- 1. **Timing & duration:** Each report covers a twelve-month period, i.e. 1 July 2021 30 June 2022.
- 2. **Responsibility:** The responsibility for preparing the report lies with the project manager in consultation with the Division Chief and Director.
- 3. **Evaluation:** For the report to be used effectively as a tool for annual self-evaluation, project counterparts need to be fully involved. The (main) counterpart can provide any additional information considered essential, including a simple rating of project progress.
- 4. **Results-based management**: The annual project/programme progress reports are required by the RBM programme component focal points to obtain information on outcomes observed.

Global Envi	Global Environmental Objectives (GEOs) / Development Objectives (DOs) ratings							
Highly Satisfactory (HS)  Project is expected to achieve or exceed all its major global environmental object or substantial global environmental benefits, without major shortcomings. The project or "good practice".								
Satisfactory (S)	Project is expected to <u>achieve most</u> of its <u>major</u> global environmental objectives, and yields satisfactory global environmental benefits, with only minor shortcomings.							
Moderately Satisfactory (MS)	Project is expected to <u>achieve most</u> of its major <u>relevant</u> objectives but with either significant shortcomings or modes overall relevance. Project is expected not to achieve some of its major global environmental objectives or yield some of the expected global environmental benefits.							
Moderately Unsatisfactory (MU)	Project is expected to achieve <u>some</u> of its major global environmental objectives with major shortcomings or is expected to <u>achieve only some</u> of its major global environmental objectives.							
Unsatisfactory (U)	Project is expected <u>not</u> to achieve <u>most</u> of its major global environmental objectives or to yield any satisfactory global environmental benefits.							
Highly Unsatisfactory (HU)	The project hasfailed to achieve, and is not expected to achieve, <u>any</u> of its major global environmental objectives with no worthwhile benefits.							

	Implementation Progress (IP)							
Highly Satisfactory (HS)	Implementation of <u>all</u> components is in substantial compliance with the original/formally revised implementation planfor the project. The project can be presented as "good practice".							
Satisfactory (S)	Implementation of <u>most</u> components is in substantial compliance with the original/formally revised plan except for only few that are subject to remedial action.							
Moderately Satisfactory (MS)	Implementation of <u>some</u> components is in substantial compliance with the original/formally revised plan with some components requiring remedial action.							
Moderately Unsatisfactory (MU)	Implementation of <u>some</u> components is <u>not</u> in substantial compliance with the original/formally revised plan with most components requiring remedial action.							
Unsatisfactory (U)	Implementation of most components in not in substantial compliance with the original/formally revised plan.							
Highly Unsatisfactory (HU)	Implementation of <u>none</u> of the components is in substantial compliance with the original/formally revised plan.							

Risk ratings	
Risk ratings will access the overall risk of factors internal or external to the project which may affect implementation or prospects for achieving project objectives. Risk of projects should be rated on the following scale:	
High Risk (H)	There is a probability of greater than <b>75%</b> that assumptions may fail to hold or materialize, and/or the project may face high risks.
Substantial Risk (S)	There is a probability of between <b>51%</b> and <b>75%</b> that assumptions may fail to hold or materialize, and/or the project may face substantial risks.
Moderate Risk (M)	There is a probability of between 26% and 50% that assumptions may fail to hold or materialize, and/or the project may face only moderate risk.
Low Risk (L)	There is a probability of up to 25% that assumptions may fail to hold or materialize, and/or the project may face only low risks.