

GEF-FUNDED ENABLING ACTIVITY PROJECT

9635 – Review and Update of the National Implementation Plan for the Stockholm Convention in Persistent Organic Pollutants (POPs) in Comoros

Project Operational Completion Report

Reporting period: February 2017– December 2021

Prepared for UN Environment Programme
and Direction Générale de l'Environnement et de la Forêt

SIGNATURES	
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Project Information Table

Identification Table		
Project Title	Review and Update of the National Implementation Plan for the Stockholm Convention on Persistent Organic Pollutants in Comoros	
Duration months	<i>Planned</i>	24
	<i>Extension(s)</i>	2 extensions: 6 + 3
		Total: 33
Division(s) Implementing the project	United Nations Environment Programme	
Name of Co-implementing Agency	N/A	
Executing Agency(ies)	Direction Générale de l'Environnement et de la Foret	
Names of Other Project Partners	N/A	
Project Type	Enabling Activity	
Project Scope	National Implementation Plan & Action Plan	
Countries	Comoros	
Programme of Work	Programme of Work 2016-2017 Output 5: "Consolidated advisory and environmental agreements"	
GEF Focal Area(s)	Chemicals and Waste	
UNSDCF / UNDAF linkages	N/A	
Link to relevant SDG target(s) and SDG indicator(s)	<p>3.9: By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.</p> <p>5c: Adopt and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women and girls at all levels.</p> <p>6.3: By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally.</p> <p>12.4: By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment.</p>	
GEF financing amount	200,000 US\$	
Co-financing amount	N/A	
Date of CEO Endorsement	19 th September 2016	
Start of Implementation	23 rd February 2017	
Date of first disbursement	3 rd of March 2017	
Total disbursement as of 30 June 2022	181,100 US\$	

Total expenditure as of 30 June 2022		175,092 US\$
Expected Mid-Term Review Date		N/A
Completion Date	<i>Planned</i>	30 th June 2020
	<i>Revised</i>	31 st December 2021
Expected Terminal Evaluation Date		August 2023
Expected Financial Closure Date		September 2023

Name of previous phase/preceding project	N/A
Anticipated future phase/future related project	N/A

Geo-referenced Maps

N/A

Abbreviations and Technical Terms

Abbreviation/Technical Term	Definition
BRS	Basel Rotterdam and Stockholm
EA	Executing Agency
GEF	Global Environmental Facility
IA	Implementing Agency
M&E	Monitoring and Evaluation
MEA	Multilateral Environmental Agreement
NIP	National Implementation Plan
OPAg	Organisation des Producteurs Agricoles
PCA	Project Coordination Agreement
PCB	Polychlorinated Biphenyls
POP	Persistent Organic Pollutant
SC	Steering Committee
ToC	Theory of Change
UNEP	United Nation Environment Programme

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1. Project Description and Implementation Arrangements

The project objective was to review and update the National Implementation Plan (NIP) in order to comply with the article 7 under the Stockholm Convention, contributing to the protection of human and health and environment from the risks posed by anthropogenic sources of Persistent Organic Pollutant. Through the process of NIP revision and update and cooperation of main national stakeholders, it's expected that Comoros will also take tangible steps toward mainstreaming chemical management in the country.

The project was funded by the Global Environment Facility, implemented by the Chemicals and Waste unit under the United Nations Environment Programme (UNEP) and executed by the Direction Générale de l'Environnement et de la Forêt in Comoros. The Implementing Agency (IA) was responsible for the overall project supervision and overseeing of the project's progress. This was set out to be performed through the monitoring and evaluation of the project activities and progress report. Additionally, UNEP, in its quality of IA, provided the Executing agency (EA) with technical and administrative support. As the EA, the Direction Générale de l'Environnement et de la Forêt managed the day-to-day aspect of the project and its activities. The EA provided the IA with administrative, progress and financial reports.

The project was endorsed by the GEF CEO on 19 of September 2016. The Project Cooperation Agreement (PCA) between UNEP and the Direction Générale de l'Environnement et de la Forêt was signed on 6 February 2017 by UNEP and on 27 February 2017 by the Executing Agency. This first amendment covered a period of 24 months, for an expiration of the PCA on 28 February 2019. Due to a delay in project execution, the EA requested in July 2019 a first extension of 6 months, and a second extension of 3 months in January 2021. However, the implementation arrangements have not been revised during the project.

2. Executing Agency Performance and Capacity

The NIP update Comoros has faced several challenges throughout the project implementation period. The initial agreement has been revised for extension two times, with no continuity in the agreement due to repetitive delay by the EA in providing reports and other required information for the two extensions provided. Many email exchanges, including several requests for progress and/or expenditure reports, as part of the obligation of the EA to the IA based on the agreement signed by both parties, were delayed by the EA, forcing the IA to follow up several times before getting a response. In September 2020, the non-responsiveness of the EA led to the receipt of a letter from the GEF Chemicals and Waste Portfolio Manager mentioning that no progress had been reported since January 2019 (18 months) and no expenditure had been reported since April 2019 (15 months).

However, the EA demonstrated capacity to overtake barriers and adapt the project to their situation in order to comply with the Stockholm Convention obligations on reporting.

Hence, the Direction Générale de l'Environnement et de la Forêt showed an overall moderately satisfactory executing capacity, with a lack of responsiveness and efficiency delivering reports, and faced difficulties in keeping the Implementing Agency regularly updated.

3. Summary of Results Achieved (Tables)

Table 1: Achievement of Outcome(s)

Project objective and Outcomes	Description of indicator	Baseline level	Mid-term target	End-of-project target	End of Project Progress Rating
Objective: <i>Review and update the National Implementation Plan (NIP) in order to comply with the article 7 under the Stockholm Convention</i>	Completion of Outcomes	N/A	N/A	NIP update Completed and validated	Moderately Satisfactory
Outcome 1: <i>Support to share information and evaluate NIPs update worldwide</i>	Assessment of previous project done, and training conducted	Training from the initial NIP	N/A	Knowledge further transferred within the Ministries and other relevant bodies	Moderately Satisfactory
Outcome 2: <i>NIP updating, endorsement and submission to the Stockholm Convention Secretariat</i>	Writing of the NIP update report, endorsement by the Ministry of Environment and submission to the Stockholm Secretariat.	N/A	N/A	NIP update published on the Stockholm Convention website.	Moderately Satisfactory
Outcome 3: <i>Monitoring and Evaluation</i>	N/A	N/A	All report due to date are submitted	All report submitted	Satisfactory

Table 2: Delivery of Output(s)

Outputs	Expected completion date	End of Project Implementation status (%) – as of August 2023	Comments if variance. Describe any problems in delivering outputs	End of Project Progress Rating
Output 1.1: Capacity building and technical assistance provided to countries to develop NIPs, while building sustainable foundations for its future implementation				
Activity 1.1.1: Organise training on projects coordination and lessons learned and good practices from previous projects. A gender expert will be engaged at this stage to ensure gender considerations are fully taken into account in the project implementation	May 2017	Complete		Highly Satisfactory
Activity 1.1.2: Organise regional discussion and information exchange on POPs on the basis of updated NIPs	July 2018	Complete		Satisfactory
Output 1.2: Knowledge management services provided				
Activity 1.2.1: Update/revise/enhance database of experts on POPs management	May 2017	Complete		Satisfactory
Activity 1.2.2: Incorporate inventory data into the SSC clearinghouse	July 2018	Complete		Moderately Satisfactory
Activity 1.2.3: Identify and disseminate lessons learned	July 2018	Complete		Moderately Satisfactory
Output 2.1: Technical guidance and support provided to strengthen the national coordination mechanism for NIP updating and future implementation				
Activity 2.1.1: National inception workshop to identify key stakeholders and agree on their roles; agree on project workplan and budget; development of a monitoring and evaluation plan and an awareness raising strategy to be implemented throughout the project.	May 2017	Complete		Satisfactory
Activity 2.1.2: Develop initial assessment of institutional needs and strengths.	May 2017	Complete		Moderately Unsatisfactory
Activity 2.1.3: Develop ToRs for National Coordination Mechanism for NIP updating.	May 2017	Complete		Satisfactory
Output 2.2: Comprehensive information on the current POPs management institutions and regulatory framework, POPs life cycle in the country and their impacts to human health and the environment compiled and made publicly available.				

Outputs	Expected completion date	End of Project Implementation status (%) – as of August 2023	Comments if variance. Describe any problems in delivering outputs	End of Project Progress Rating
Activity 2.2.1: Develop a comprehensive overview of national infrastructure and regulatory framework to manage POPs and prepare report;	July 2017	Complete		Moderately Satisfactory
Activity 2.2.2: Develop inventories covering all 23 POPs: including updated inventories for POPs covered in initial NIP and first inventories for newly-listed POPs and prepare report;	January 2018	Complete		Moderately Satisfactory
Activity 2.2.3: Develop an overview of POPs impacts to human health and the environment and prepare report	January 2018	Complete		Satisfactory
Output 2.3: Draft updated NIP developed based on identified national priorities.				
Activity 2.3.1: Develop report on national progress made on POPs management after NIP submission;	April 2018	Complete		Moderately Satisfactory
Activity 2.3.2: Action Plans for all POPs developed and/or updated and validated by all stakeholders;	June 2018	Complete		Satisfactory
Activity 2.3.3: Develop and make available to all stakeholders a gap analysis report;	June 2018	Complete		Satisfactory
Activity 2.3.4: Make draft NIP updated available to all stakeholders.	June 2018	Complete		Satisfactory
Output 2.4: Technical support provided to facilitate the NIP endorsement and submission to the Stockholm Convention Secretariat.				
Activity 2.4.1: Develop and implement NIP outreach strategy report in consultation with key national stakeholders;	August 2018	Uncomplete	Won't be completed	Highly Unsatisfactory
Activity 2.4.2: Develop and initiate the implementation of a roadmap for NIP endorsement and submission to the Stockholm Convention Secretariat.	August 2018	Uncomplete	The report has been submitted to the Stockholm Convention Secretariat yet.	Moderately Satisfactory
Output 3.1: Status of project implementation and probity of use of funds accessed on a regular basis and communicated to the GEF.				
Activity 3.1.1: EA develops and submit technical and financial reports quarterly to UNEP using UNEP's templates;	Quarterly & Bi-annually	Complete	Repeated delays in reporting Report from 2021 is still missing	Highly Unsatisfactory
Activity 3.1.2: UNEP communicate project progress to the GEF yearly during the PIR using GEF's template;	Yearly	Complete		Moderately Satisfactory

Outputs	Expected completion date	End of Project Implementation status (%) – as of August 2023	Comments if variance. Describe any problems in delivering outputs	End of Project Progress Rating
Activity 3.1.3: Develop and submit terminal report and final statement of accounts to UNEP at project end;	February 2019	Uncomplete		Satisfactory
Activity 3.1.4: Identify and contract independent audit company or government auditor to carry out the final financial audit;	February 2019	Uncomplete		Satisfactory
Activity 3.1.5: Submit final financial audit to UNEP.	February 2019	Uncomplete		Satisfactory
Output 3.2: Independent terminal evaluation developed and made publicly available.				
Activity 3.2.2: UNEP EO carry out the terminal evaluation upon the request of the UNEP Task Manager and make it publicly available in the UNEP website.	After project completion and closure	In progress		

4. Implementation Challenges and Adaptive Management

Challenge Encountered	Action Taken
Budget for stakeholder's travel to SC and other events not sufficient considering Comoros is an archipelago and not a single land mass, which results in increased costs and logistical challenges associated with travel	Organization of hybrid meetings (in-person and online).
Individuals assigned to the project management and co-management having other projects were not paid by the NIP, and therefore time spent for the project was lacking.	National coordinator chosen, being able to spend more time for the project for the project, with financial incentive instead of salary.
The writing of the NIP draft report was not moving forward.	Allocate a period of time for the international consultant to sit with them, in the Comoros, with the final report draft as outcome of the mission.

5. Project Costs and Financing

Table 2: Project Total Funding¹ and Expenditures

Funding by source (Life of project)	Planned funding	Secured funding	Expended – as of August 2023
<i>All figures as USD</i>			
GEF Grant	200,000	200,000	175,092
<i>Sub-total: Project Funding</i>	<i>200,000</i>	<i>200,000</i>	<i>175,092</i>
Staffing (Total throughout the project)	Planned posts	Filled posts	-
<i>All figures as Full Time Equivalents</i>			
GEF grant-funded staff post costs	This information was not made available as of October 2023		
Co-finance funded staff post costs			

Table 3: Expenditure by Component, Outcome or Output (depending on financial system capabilities)

Component/sub-component/output	Estimated cost at design	Actual Expenditure	Expenditure ratio (actual/planned)
Component 1: Support to share information and evaluate NIPs worldwide.	9,900 US\$	No component breakdown of expenditures was made available by the EA as of October 2023	No component breakdown of expenditures was made available by the EA as of October 2023
Component 2: NIP updating, endorsement and submission to the Stockholm Convention Secretariat.	161,918 US\$		

¹ "Enabling Activities: The Guidance has been clarified to confirm that *co-financing is not required for EAs*, that PPGs are not available for EAs, and that M&E budgets are not required as these costs do not apply to EAs. " pg.33, GUIDELINES ON THE PROJECT AND PROGRAM CYCLE POLICY (GEF/C.59/Inf.03) July 2020

Component 3: Monitoring and Evaluation.	10,000 US\$		
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6. Stakeholder Engagement and Capacity Development

The NIP update in the Comoros engaged with several national and international stakeholders concerned by the manufacture, import, sell and treatment of POPs during the lifetime of the project. In particular, several retailers selling pesticide were involved in steering committees and participated in several event on POPs. Most of them, now aware of the adverse effects of POPs on human health and the environment, were committed to check and ensure that their stock does not include any more stocks of POPs pesticides.

The National Electrical Company (Sociétés Nationales d'Electricité), being aware of the presence of PCB in transformers, stopped buying transformers containing PCBs, reported the one containing PCBs, and a Tanzanian electrical company was engaged for shipping the PCB containing transformer out of the Comoros, to a place that can store them in an Environmentally Sound Management (ESM) while waiting for disposal.

Local authorities participating in the steering committees also started taking actions to monitor products containing entering in the Comoros with the creation of a logbook for POPs.

Youth from the Comorian university were engaged and involved at some point of the project, despite their geographical remoteness and the impossibility to ship them across the Comorian islands.

7. Awareness Raising Activities

Awareness raising activities have occurred during the project's implementation, having direct effects on stakeholders attending to SC and other events. The Comoros engaged with decision makers, private institutions and associations such as retailers and electrical companies, and the OPAg (Farmers Organization).

Some Comorian universities were contacted to participate in the Steering Committee and to attend to awareness raising event, but the Comoros being several islands, the displacement cost is very often exceeding the project's budget for travel.

8. Sustainability and the Scaling Up of Positive Results

Following the legislative work undertaken by the national and international consultants, the *National Office for Wastes Management* (Office National pour la Gestion des Déchets) was established, in partnership with the Environment Department. This National Office aims to develop long-term political strategies on waste management through monitoring of municipal and hazardous waste. This Office was also established to attribute financial and human resources for potential opportunities for Mercury and POPs initiatives.

9. Incorporation of Human Rights and Gender Equality (GEF Portal Question)

Regarding the incorporation of human rights, the project made a positive step toward providing access to clean environments to creating progress towards a POP safe environment in the country. A gender expert was engaged to incorporate a gender dimension in the project coordination and management, empowering women and ensuring gender equity in the decision making.

Hence, the project's implementation presented a high involvement of women in events, meetings, steering committees, and even as national consultant for the project. The important involvement of women was appreciated by the stakeholders as being a great improvement.

10. Environmental, Social and Economic Safeguards (GEF Portal Question)

There were no negative environmental impacts identified in the Safeguards Plan at CEO Approval, as the project had a baseline setting nature. Additionally, there were no significant environmental impacts of the project identified during the Operational Completion Report as the project assessed the situation with regards to POPs in Comoros.

However, the inventories conducted will allow the Comoros to address their national priorities with improved socioeconomic and environmental consideration and information.

11. Knowledge Management (GEF Portal Question)

The National Office for Wastes Management has also been established to build on the different training brought in the Comoros by the project. They kept record of the inventories conducted during the project and will update those inventories with their PFOS monitoring at the borders, their future work on PCB stockpiles and complete the baseline with other hazardous waste as well as municipal waste.

Moreover, all the knowledge shared during the events and experience earned during the implementation of the NIP seats within the *National Office for Wastes Management* and is managed in partnership with the government, allowing a better coordination of the environmental decisions on hazardous chemicals and waste management.

12. Lessons Learned (GEF Portal Question – Main Findings)

Lessons learned from 9635 NIP Comoros are as follows:

1. Cookie Cutter timelines and expectations are unrealistic for LDCs and SIDS:

Lack of existing technical and institutional capacity creates challenges LDCs and SIDS such as Comoros. Assumptions and expectations around project deliverables and timelines were unrealistic to execute the NIP project in Comoros properly. Multiple project extensions were required, and data quality may have been negatively impacted as a trade-off to meet timeline expectations. The one size fits all approach cannot be taken for all Enabling Activities.

2. Poor data quality leads to a country's inability to access funding:

SIDS and LDCs such as Comoros require support to fully meet the requirements of the Stockholm Convention. However, the data requirements to access financial support to implement Comoros' action plan exceed the outputs of the NIP project. Resource and time allocation to data collection may not have been sufficient at project design for Comoros. The NIP Inventory identify the needs and priorities for Comoros moving forwards and highlights prioritised sectors where further data is required.

13. Recommendations

As part of the sustainability and scaling up of the action plan, the national stakeholders, and in particular focal point for POP could be further trained and informed on how to access funds for environmental issues. Also, training on how to increase the scale and impact of their national actions, as interacting with international financing institutions and mechanism can be a barrier to fulfil their national environmental priorities.

1. Provide financial incentives and management support for project managers assigned to enabling activities to ensure proper execution, monitoring and reporting of the project.
2. Allocate more budget to data collection for LDCs and SIDS with little to no data baselines and adapt the Stockholm Convention toolkit to conduct inventories to the capacity and context of LDC and SIDS.

Annexes

Annex 1 Logical Framework and Theory of Change diagram

Project framework:

Project Objective: Review and update the National Implementation Plan (NIP) in order to comply with the article 7 under the Stockholm Convention.			
Project Component	Project Outputs	(in \$)	
		GEF Project Financing	Confirmed Co-Financing
1. Support to share information and evaluate NIP worldwide.	1.1.Capacity building and technical assistance provided to countries to develop NIPs while building sustainable foundations for its future implementation; 1.2.Knowledge management services provided.	9,900	0
2. NIP updating, endorsement and submission to the Stockholm Convention Secretariat	2.1.Technical guidance and support provided to strengthen the national coordination mechanism for NIP updating and future implementation; 2.2.Comprehensive information on the current POPs management institutions and regulatory framework, POPs life cycle in the country and their impacts to human health and the environment compiled and made publicly available; 2.3.Draft updated NIP developed based on identified national priorities; 2.4.Technical support provided to facilitate the NIP endorsement and submission to the Stockholm Convention Secretariat.	161,918	0
3. Monitoring and Evaluation	3.1.Status of project implementation and probity of use of funds accessed on a regular basis and communicated to the GEF. 3.2.Independent terminal evaluation developed and made publicly available.	10,000	0
Subtotal		181,818	0
Project Management Cost		18,182	0
Total Project Cost		200,000	0

Theory of Change:



Annex 2 **Stakeholder Engagement Plan**

N/A

Annex 3 **Planned Multi-Year Budget** (*Listing the activities per component outcome and comparing the planned versus executed budget – life of project*)

UNEP BUDGET LINE/OBJECT OF EXPENDITURE	BUDGET ALLOCATION BY PROJECT COMPONENT/ACTIVITY					ALLOCATION BY CALENDAR YEAR			
	Component 1	Component 2	Component 3	Project Management	Total	Year 1	Year 2	Total	
	Support to share informations and evaluate NIPs worldwide	NIP development, endorsement and submission to the Stockholm Convention Secretariat	Monitoring and evaluation						US\$
10	PROJECT PERSONNEL COMPONENT								
1161	National project coordinator			18,000	18,000	9,000	9,000	18,000	
1161	Technical Project Officer		0	18,000	18,000	9,000	9,000	18,000	
1161	Sub-Total								
1161	Consultant w/m								
1161	National Consultants		69,750		69,750	48,825	20,925	69,750	
1161	International Consultants		18,000		18,000	18,000		18,000	
1161	Sub-Total		87,750	0	87,750	66,825	87,750	87,750	
1161	Administrative support								
1161	Support staff			0	0	0	0	0	
1161	Sub-Total								
1561	Travel on official business								
1561	Travel on official business experts		11,138		11,138	7,797	3,341	11,138	
1561	Sub-Total		11,138		11,138	7,797	3,341	11,138	
	Component Total		98,888	18,000	116,888	83,622	33,266	116,888	
20	SUB-CONTRACT COMPONENT								
2261	Sub-contract (UN Organization)								
2261	Subcontract	9,900			9,900	9,900	0	9,900	
2261	Sub-Total	9,900			9,900	9,900	0	9,900	
	Component Total	9,900			9,900	9,900	0	9,900	
30	TRAINING COMPONENT								
1561	Group training (field trips, WS, etc.)								
1561	National workshop on POPs inventory		13,000		13,000	13,000		13,000	
1561	Training workshop on POPs priority		7,200		7,200	7,200		7,200	
1561	Sub-Total		20,200		20,200	20,200		20,200	
1561	Meetings/conferences								
1561	Inception workshop		8,600		8,600	8,600		8,600	
1561	Outputs validation workshops								
1561	Final workshop for NIP endorsement		10,000		10,000	5,000	5,000	10,000	
1561	National Coordination Meetings		11,500		11,500	8,050	3,450	11,500	
1561	Sub-Total		30,100	0	13,100	21,650	8,450	30,100	
	Component Total		50,300	0	50,300	41,850	8,450	50,300	
40	EXPENDABLE EQUIPMENT COMPONENT								
4261	Expendable equipment								
4261	Operating costs		5,530	182	5,712	3,998	1,714	5,712	
4261	Vehicule maintenance								
4261	Sub-Total		5,530	182	5,712	3,998	1,714	5,712	
4261	Non-expendable equipment								
4261	Computer, fax, photocopier, projector				0				
4261	Software				0				
4261	Sub-Total	0	0	0	0	0	0	0	
	Component Total	0	5,530	182	5,712	3,998	1,714	5,712	
50	MISCELLANEOUS COMPONENT								
5161	Reporting costs (publications maps, NL)								
	Finalization report and dissemination strategy		7,200		7,200		7,200	7,200	
	Sub-Total		7,200		7,200	0	7,200	7,200	
	Project closing evaluation								
	Terminal Evaluation			5,000	5,000		5,000	5,000	
	Final audit			5,000	5,000		5,000	5,000	
	Sub-Total	0		10,000	10,000	0	10,000	10,000	
	Component Total		7,200	10,000	0	10,000	0	10,000	
	TOTAL	9,900	161,918	10,000	18,182	200,000	139,370	200,000	
	TOTAL GEF COST						200,000		

Annex 4 **Risk Management Log** (*Compiled from annual PIRs*)

PIR aren't required for Enabling Activities

Annex 5 **Final Financial Statement**

Not made available by the EA as of October 2023

Annex 6 **Inventory of Non- Expendable Equipment**
Not made available by the EA as of October 2023