

Development of National Action Plan for Artisanal and Small-Scale Gold Mining in Togo

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10527

Countries

Togo

Project Name

Development of National Action Plan for Artisanal and Small-Scale Gold Mining in Togo

Agencies

UNEP

Date received by PM

3/20/2020

Review completed by PM

Program Manager

Satoshi Yoshida

Focal Area

Chemicals and Waste

Project Type

EA

Expedited Enabling Activity req (CEO)

Part 1: Project Information

Focal area elements

Is the enabling activity aligned with the relevant GEF focal area elements as indicated in Table A and as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Project description summary

Is the project structure/ design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2020, SY: Comments cleared.

April 22, 2020, SY: Previous comments cleared, while noting response on co-financing is not relevant to the comments here. Additionally, given the COVID-19 pandemic including in Togo, please confirm the current starting date of the implementation (June 1, 2020) and the project supervision plan (Appendix F) are still feasible. Also, project supervision plan shows that national inception workshop and other components will start before June 1, 2020, which needs to be modified.

March 23, 2020, SY: Largely yes. Please address the below points.

1. All three outcomes are the same although outputs are unique for each component. Please revise outcomes in accordance with respective outputs.
2. In terms of timeline, expected completion date is 5/31/2020 and expected report submission to convention is also on 5/31/2020, while the implementation is expected to start on June 1, 2020. Please correct these dates.

Agency Response

UNEP 27/04/2020

Supervision plan are always adapted before the PCA is signed and it is not efficient to do it at this stage as we do not know when the project will be endorsed by the GEF. When we obtain the CEO endorsement letter, then the plan will be adjusted. The inception phase of the project can be initiated irrespective of the lock-down status of the country. Contracting the EA, establishing the project steering group, identifying project experts and preparation for the inception workshop can be done, and is usually done remotely. This is the case for the recently approved projects.

UNEP 20/04/2020

- 1) GEF Components and project outcomes are not the same. As all enabling activities, the project has only one outcome which is: “Togo is enabled to develop and implement its NAP and contribute to the protection of the human health and the environment from the emissions and releases of mercury from the artisanal and small-scale gold mining sector”. This is also reflected in the project logical framework in annex A.

2) Dates corrected. Enabling activities do not have co-financing requirement. The commitment of the country is demonstrated by the ratification of the Convention and the OFP endorsement letter.

Co-financing

Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified [and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?]

Secretariat Comment at PIF/Work Program Inclusion

March 23, 2020, SY: No co-financing will be provided to this project. While co-financing is not required to enabling activity projects including from the government, the commitment of the government to develop and implement a NAP is essential.

Agency Response

UNEP 20/04/2020

Enabling activities do not have co-financing requirement. The commitment of the country is demonstrated by the ratification of the Convention and the OFP endorsement letter.

GEF Resource Availability

Is the proposed GEF financing in Table D (including the Agency fee) in line with GEF policies and guidelines?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

**Are they within the resources available from:
The STAR allocation?**

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The LDCF under the principle of equitable access

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Is the financing presented adequate and demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Part 2: Enabling Activity Justification

Background and Context.

Are the achievements of previously implemented enabling activities cited since the country(ies) became a party to the Convention?

Secretariat Comment at PIF/Work Program Inclusion

Yes, it describes the findings of the Minamata Initial Assessment conducted with GEF funding.

Agency Response

Goals, Objectives, and Activities.

Is the project framework sufficiently described?

Secretariat Comment at PIF/Work Program Inclusion

April 22, 2020, SY: Yes, it is clear that the guidance was used in developing the document. PM understands from the response that the output 2.1 will include such actions in developing a NAP.

March 23, 2020, SY: Yes, it is detailed and largely in line with the guidance for NAP agreed by the COP. However, it is not clear if the project also addresses actions listed under Annex C.1.(b) of the convention (noting burning amalgam is described in the gender dimension only). Please clarify.

Agency Response

UNEP 20/04/2020

As mentioned in section B, the project is using the official guidance for NAP development adopted by COP (UNEP/MC/COP.1/17) and which covers all the requirement of Annex C, including, but not limited to Annex C.1.(b). The Guidance document was developed by the UNEP Global Mercury Partnership.

Stakeholders.

Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2020, SY: Comments cleared.

April 22, 2020, SY:

1. The guidance document does not stipulate how each stakeholder is engaged (i.e. "contribution to Development of the NAP" of each stakeholder in the document). Please elaborate/clarify the roles of, at least, Miner organizations, Police and Customs officials, and Private sector partner taking into consideration national circumstances, so that it is clear how these stakeholders contribute to developing the NAP. Representatives from large scale mining, for example, will "contribute to finding innovative solutions and provide insights on mining regulatory issues," which demonstrates how this stakeholder is engaged in the NAP process.
2. Cleared.
3. Thank you for streamlining. Please revise the UNEP's document as well.

March 23, 2020, SY: Yes. However, please consider the below points and revise accordingly.

1. Means of engagement is not clear for some stakeholders under table 2 for development of a NAP (e.g. Miner organizations: Understand how to organize miners.). Please clarify and elaborate.
2. As indigenous people are included while they are not fully described in the project components. Please elaborate their roles under stakeholder engagement as well as in the NAP development, as appropriate.
3. Ministry of Economy and Finances has 3 columns and Ministry of Justice has 2 columns in the table 1. Please streamline.

Agency Response

UNEP 27/04/2020

1. This will be done at inception, in collaboration with the executing agency and in collaboration with the stakeholders and in line with the NAP guidance. The identification of stakeholders is actually an activity of the NAP. The Quick Start guide developed by the UNEP Global Mercury Partnership provides a more complete list of potential stakeholders. As for miners organisations, police, customs and private sector partners, contributions of these stakeholders will be further defined during the inception stage due to the limited information available at this stage.

3. Done.

UNEP 20/04/2020

- 1) Means of engagement are described in the guidance document developed by the UNEP Global Mercury Partnership and adopted at COP1 (UNEP/MC/COP.1/17) in its section 5.7. The project will follow the guidance.
- 2) If mining is identified in indigenous land, the above will apply.
- 3) Corrected.

Gender equality and women's empowerment.

Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Monitoring and Evaluation.

Does the project include a budgeted M&E Plan?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2020, SY: Comments cleared based on the CEOER revised on May 10.

April 22, 2020, SY: Thank you for the clarification in the below. Technical and financial progress reports are charged to M&E costs unlike other EA projects and these are covered by the PMCs in line with the guidelines of the project and program cycle policy. Please revise these parts and adjust budget allocation taking into account the limit of PMCs.

March 23, 2020, SY: Yes. However, please clarify the below points.

1. The budget of National inception and training workshops is blank, while it charges \$15,000 as training component in the budget sheet (page 31 of the UNEP's document). Please clarify if M&E budget is included in the part of \$15,000 budget and adjust, as appropriate.
2. Independent Financial Audit is written in the table 3 while noting that it does not charge the M&E budget (which is in line with the guidelines). Such audit cost does not charge PMCs either (according to the budget sheet), which implies that the EA (CASE) will cover the cost outside the project budget. Please clarify. Also, "A. Enabling Activity Background and Context" states that the final audit will be sent to UNEP within six months after technical completion, while this section (table) refers to 3-month timeline. Please clarify and adjust.

Agency Response

UNEP 27/04/2020

Corrected.

UNEP 20/04/2020

- 1) The organisation of the inception workshop, is not part of the M&E budget as per other projects previously submitted and approved. Only the development of workplan and their approval is part of the M&E costs of an inception workshop. This is why the budget is split between component 2 and the M&E budget.
- 2) Financial audit is charged to PM cost in the table p31. Timeline has been adjusted.

Cost Effectiveness.

Is the project cost effective?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Cost Ranges

If there was a deviation in the cost range, was this explained?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Part III. Endorsement/ Approval by OFP

Country endorsement

Has the project been endorsed by the country's GEF Operational Focal Point and has the name and position been checked against the GEF database?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2020, SY: Comments cleared.

April 22, 2020, SY: The response does not address the comment. The timing of the second notification letter under Article 7 is not directly related to the validity of the OFP endorsement letter.

March 23, 2020, SY: Yes, Mr. Comlan AWOUGNON is the current OFP who signed the endorsement letter. However, the date of the letter is almost a year ago. Please confirm the letter is still valid and a copy of the proposal was received by OFP as indicated in the letter.

Agency Response

UNEP 27/04/2020

The OFP letter was signed in the current GEF cycle and by the current OFP, we confirm it is therefore valid.

The MC focal point changed during 2019 and the new focal point was only nominated this year. Therefore, the notification letter was only obtained this year.

UNEP 20/04/2020

The OFP endorsed the letter before the Minamata Focal Point signed the required notification letter.

Response to Comments

Are all the comments adequately responded to? (only as applicable)

GEF Secretariat Comment**Agency Response**

Other Agencies comments?

Secretariat Comment at PIF/Work Program Inclusion**Agency Response**

Council comments

Secretariat Comment at PIF/Work Program Inclusion**Agency Response**

STAP Comments

Secretariat Comment at PIF/Work Program Inclusion**Agency Response**

Convention Secretariat comments

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

CSOs comments

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is CEO Endorsement/approval recommended?

Secretariat Comment at PIF/Work Program Inclusion

May 11, 2020, SY: Remaining comments are addressed (the latest CEOER on May 10). The PM recommends this project for technical clearance.

April 22, 2020, SY: Please address the remaining comments above.

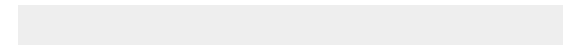
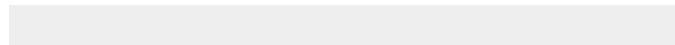
March 23, 2020, SY: Not at this stage. Please address the above comments.

Review Dates

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

First Review



Secretariat Comment at CEO Endorsement

Response to Secretariat comments

Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		

CEO Recommendation

Brief reasoning for CEO Recommendations

The Minamata Convention on Mercury controls the use of mercury. Article 7 of the Convention controls the use of mercury in the artisanal and small-scale gold mining sector. Parties to the Convention that have artisanal and small-scale gold mining in their territories that uses mercury, on determining that there is a more than insignificant use of mercury in the sector can notify the Convention of this use. Once a Party notifies such use it is required to undertake the development of a national action plan which sets out the action plan the Party will implement to phase out of mercury in the sector. These national action plans are enabling activities under the Convention and are a requirement for the financial mechanism to fund.

The Government of Togo has ratified the convention and made notifications under Article 7; therefore, it is eligible for funding for the development of a national action plan for the ASGM sector.

This project has been reviewed and follows GEF policy and is consistent with the requirements set out in the Minamata Convention and the GEF 7 CW programming directions. The project on completion will both allow the Government of Togo to fulfill its obligations as a Party to the Minamata Convention and to act to reduce and eventually eliminate the use of mercury in its ASGM sector.