

# Elimination of Mercury-Added Skin Lightening Products (SLPs) in Africa

Review PIF and Make a recommendation

## Basic project information

**GEF ID**

11877

**Countries**

Regional (Burkina Faso, Comoros, Cote d'Ivoire, Ethiopia, Guinea, Madagascar, Mauritania, Niger, Nigeria, Sierra Leone, South Africa, Togo, Uganda)

**Project Name**

Elimination of Mercury-Added Skin Lightening Products (SLPs) in Africa

**Agencies**

UNEP

**Date received by PM**

3/6/2025

**Review completed by PM**

3/13/2025

**Program Manager**

Toshiyuki Yamasaki

**Focal Area**

Chemicals and Waste

**Project Type**

FSP

## **GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET**

### **1. General Project Information / Eligibility**

**a) Does the project meet the criteria for eligibility for GEF funding?**

**b) Is the General Project Information table correctly populated?**

#### **Secretariat's Comments**

Toshi Mar/13/2025:

Yes, the project meets the criteria for eligibility of GEF funding. The table is also populated correctly.

#### **Agency's Comments**

### **2. Project Summary**

**Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?**

#### **Secretariat's Comments**

Toshi Apr/8/2025:

Thank you, cleared.

Toshi Mar/13/2025:

The project summary describes the problems to be addressed, the project objective and the strategies to achieve phasing out mercury-added skin lightening products (SLPs). However, the length of description exceeds the limit of 250 words, please reduce volume and make it concise, while keeping a description of GEBs (the last paragraph).

**Agency's Comments** The project summary has been shortened.

### **3 Indicative Project Overview**

**3.1 a) Is the project objective presented as a concise statement and clear?**

**b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?**

#### **Secretariat's Comments**

Toshi Apr/8/2025:

Thank you, cleared.

Toshi Mar/13/2025:

- 1) The fourth item in Output2.1 says, "develop long term investment plans/business models related to equipment," but the content is unclear. Please explain further what kind of investment plan this means and what output you expect from this.
- 2) The second item in Output 3.1 states, "Assess the economic and monetary dimensions of maintaining surveillance and long-term sustainability of compliance related actions." Could you please elaborate and provide additional explanation on what will be assessed and how.
- 3) The first item in Output 3.2 says "Create market surveillance systems," but it is unclear, please elaborate so that it is clear what system is expected.

Agency's Comments Further clarifications related to the 3 items are included in the description of the respective outputs.

**3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes, gender, KM and M&E are included.

Agency's Comments

**3.3 a) Are the components adequately funded?**

**b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**

**c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?**

Secretariat's Comments

Toshi Apr/8/2025:

Thank you, cleared.

Toshi Mar/13/2025:

The GEF Project Financing and the Co-financing contributions for PMC correspond to 5.00% and 4.83% of the total GEF grant and total co-financing contributions respectively. If possible, please adjust the co-financing contribution to the PMC so that it is proportional to the GEF project financing contribution.

Agency's Comments Co-financing adjusted to correspond to comparable proportions as GEF project financing toward PMC.

#### **4 Project Outline**

##### **A. Project Rationale**

##### **4.1 SITUATION ANALYSIS**

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

#### 4.2 JUSTIFICATION FOR PROJECT

a) Is there an indication of why the project approach has been selected over other potential options?

b) Does it ensure resilience to future changes in the drivers?

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?

d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

Toshi Apr/8/2025:

Thank you, cleared.

Toshi Mar/13/2025:

Stakeholder Engagement:

The expected roles of stakeholders are described in A. Project Rationale - 4. Key Stakeholders and Appendix 3. However, please more elaborate the expected role of CSOs.

Agency's Comments Description on CSO role in the project was added to the Key Stakeholders section.

#### 5 B. Project Description

##### 5.1 THEORY OF CHANGE

a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?

b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments

Toshi Apr/8/2025:  
Thank you, cleared.

Toshi Mar/13/2025:  
The "Figure 1. Theory of Change" in P.17 is blurry and unreadable. Could you please increase the resolution (or do something) to make it easier to read?

Agency's Comments Resolution of TOC increased to improve readability.

## **5.2 INCREMENTAL/ADDITIONAL COST REASONING**

**Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?**

Secretariat's Comments

Toshi Mar/13/2025:  
Yes.

Agency's Comments

## **5.3 IMPLEMENTATION FRAMEWORK**

**a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?**

**b) Comments to proposed agency execution support (if agency expects to request exception).**

**c) Is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area**

**d) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**

Secretariat's Comments

Toshi Mar/13/2025:  
Yes.

Agency's Comments

**5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?**

**b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?**

Secretariat's Comments

Toshi Mar/13/2025:  
Yes.

Agency's Comments

**5.5 NGI Only: Is there a justification of financial structure and use of financial instrument with concessionality levels?**

Secretariat's Comments

N/A.

Agency's Comments

**5.6 RISKS**

**a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?**

**b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?**

**c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**5.7 Qualitative assessment**

**a) Does the project intend to be well integrated, durable, and transformative?**

**b) Is there potential for innovation and scaling-up?**

**c) Will the project contribute to an improved alignment of national policies (policy coherence)?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities**

**6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?**

Secretariat's Comments

N/A.

Agency's Comments

**7 D. Policy Requirements**

**7.1 Is the Policy Requirements section completed?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**8 Annexes**

**Annex A: Financing Tables**

**8.1 Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):**

**STAR allocation?**

Secretariat's Comments  
N/A.

Agency's Comments  
**Focal Area allocation?**

Secretariat's Comments  
Toshi Mar/13/2025:  
Yes.

Agency's Comments  
**LDCF under the principle of equitable access?**

Secretariat's Comments  
N/A.

Agency's Comments  
**SCCF A (SIDS)?**

Secretariat's Comments  
N/A.

Agency's Comments  
**SCCF B (Tech Transfer, Innovation, Private Sector)?**

Secretariat's Comments  
N/A.

Agency's Comments  
**Focal Area Set Aside?**



Secretariat's Comments

N/A.

Agency's Comments

**8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**Annex B: Endorsements**

**8.4 Has the project been endorsed by the country? (ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?**

Secretariat's Comments

Toshi Apr/8/2025:

Thank you, cleared.

Toshi Mar/13/2025:

The LOEs for two of the 13 countries (Guinea and South Africa) have not been uploaded yet. Please upload them as soon as possible.

Agency's Comments **LOE from Guinea and South Africa have been uploaded to the Portal.**

**Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?**

Secretariat's Comments

Toshi Apr/8/2025:

Thank you, cleared.

Toshi Mar/13/2025:

The LOE template used by C?te d'Ivoire and Madagascar has the following problems:  
The LOE template used for C?te d'Ivoire and Madagascar removed the footnote that conditions the selection of the executing partner to the following: "Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?". Per the attached email distributed back in March when we were aiming to constitute June 2023 Work Program, Agencies were informed that LoEs "with modifications cannot be accepted and will be returned?". While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project. Please get an email from the OFP accepting this footnote to be part of the LoE (this is an alternative to request a new LoE).

Agency's Comments **Both LOEs (from Madagascar and C?te d'Ivoire) contain the footnote and have been uploaded to the Portal.**

**8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?**

Secretariat's Comments

N/A.

Agency's Comments

**Annex C: Project Location**

**8.6 Is there preliminary georeferenced information and a map of the project's intended location?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

## **Annex D: Safeguards Screen and Rating**

**8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?**

### **Secretariat's Comments**

Toshi Apr/8/2025:

Thank you, cleared.

However, I have also provided comments on this matter in Section 9.2, Additional Comments to be considered at the time of CEO Endorsement, so please see that as well.

Toshi Mar/21/2025:

We note that UNEP attached the Safeguard Risk Identification Form (SRIF) and classified the project as moderate risk. However, it is not clear what kind of action will be taken during PPG.

- Please provide plans to assess identified environmental and social risk further including potential risk of relocations and loss of livelihood and develop environmental and social risk management plan during PPG. The plan of mitigation measure should be summarized in the Key risk table.
- Please also provide plan to identify and engage most vulnerable populations potentially affected by the projects during the PPG. This plan also needs to be summarized in the key risk table.

Agency's Comments Key risk table modified to include development of safeguard related plans during PPG phase.

## **Annex E: Rio Markers**

**8.8 Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?**

### **Secretariat's Comments**

N/A.

### **Agency's Comments**

## **Annex F: Taxonomy Worksheet**

**8.9 Is the project properly tagged with the appropriate keywords?**

Secretariat's Comments

Toshi Mar/13/2025:

Yes.

Agency's Comments

**Annex G: NGI Relevant Annexes**

**8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat's Comments

N/A.

Agency's Comments

**9 GEFSEC Decision**

**9.1 Is the PIF and PPG (if requested) recommended for technical clearance?**

Secretariat's Comments

PM recommends the project for further processing.

Agency's Comments

**9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval**

Secretariat's Comments

Toshi Apr/8/2025:

1) On Gender:  
OK.

2) On ESS:

Regarding our comment on safeguards in Section 8.7, with regard to the "development of safeguard related plans during the PPG phase," this is acceptable at the PIF stage, but please note that at the CEO Endorsement stage, appropriate reflections should be made, if necessary, based on the plans developed during the PPG phase.

Toshi Mar/21/2025:

On Gender:

- 1) Please ensure to include relevant gender-specific indicators in the Results Framework.
- 2) SLPs has important gender dimensions. When developing the Gender Action Plan, please ensure the finding are integrated into the relevant outputs.
- 3) In the development of the Gender Action Plan, please include specific budget lines, as appropriate and plans for monitoring and reporting on the GAP. Under M&E, please reflect that reports submitted (MTR and TE) include gender-specific results and progress in the implementation of the gender action.

Agency's Comments The gender recommendations will be carried forward into the PPG phase where the results framework, gender action plan and budget allocations toward gender will be further discussed and finalized.

Review Dates

	PIF Review	Agency Response
<b>First Review</b>	<b>3/13/2025</b>	
<b>Additional Review (as necessary)</b>	<b>3/21/2025</b>	
<b>Additional Review (as necessary)</b>	<b>4/8/2025</b>	
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		