

Circular Solutions to Plastic Pollution

Review PIF and Make a recommendation

Basic project information

GEF ID

11181

Countries

Global (Brazil, Burkina Faso, Cambodia, Cook Islands, Costa Rica, Dominican Republic, India, Jordan, Lao PDR, Morocco, Nigeria, Peru, Philippines, Senegal, South Africa)

Project Name

Circular Solutions to Plastic Pollution

Agencies

UNEP, WWF-US, UNDP, UNIDO

Date received by PM

4/12/2023

Review completed by PM

5/16/2023

Program Manager

Leah Karrer

Focal Area

Multi Focal Area

Project Type

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Program Information

a) Is the Program Information table correctly filled, including specifying adequate executing partners?

Secretariat's Comments

(Karrer, May 17, 2023). Yes. During PPG the EAs will be further refined.

(PPO, May 16, 2023). No. Regarding the general information section, no changes were made to the executing partner name section; however, most of the LoEs have endorsed an executing entity. Please fill out as many executing entities (with the correspondent type) as included in the LoEs ? each one has to be included in a different row. Also, on the program commitment deadline, an 18-month deadline mean 12/30/2024 from Council meeting on 6/30/2023, but in Portal the deadline is entered as 1/31/2025 ? please amend.

(Karrer, April 25, 2023)

1. Please revise to address the comments sent by Mohamed and Leah 3/30/2023 in the PFD upstream version (also posted in Portal).

2. Please number the paragraphs in the PFD for easy reference in the next review.

(Karrer & PPO, April 25, 2023)

3. Please note any EAs that are anticipated. The identification of additional EAs will need to be a priority for the PPG. A plan for doing so (e.g. the survey sent out, consultations, etc.) needs to be noted in the PFD.

(PPO, April 25, 2023)

4. Please note the program commitment deadline.

5. Several inconsistencies were found in the Portal for this project, which are reflected in the Excel sheet in red font (posted to the Portal and emailed 4/26, including Excel sheet). These inconsistencies relate to Nigeria, India, Brazil, Cambodia, Costa Rica, Peru, Laos, and Morocco and all need to be addressed. The figures in Portal can be lower than those in LoE, so there is no need to do anything on these ? but it can't be higher (some cases are higher by cents ? this needs to be amended because the total Agency Fee is higher by 2 dollars or so). Some fields are easier to be changed in Portal (i.e. Title or Executing Entity). On LoEs (Brazil) was signed by a previous OFP. Please note that the financial information needs to be carefully reviewed considering the guidance provided by the IP Coordination Team *as well as* the figures that allow the submission to go through. We could not find the LoEs from Nigeria neither from India.

Agency's Comments

Agency's Comments 5 May 2023

1. Comments sent by Mohamed and Leah 3/30/2023 in the PFD upstream version have been addressed in this new version.
2. Paragraphs in the PFD have been numbered for easy reference in the next review.
3. Please note any EAs that are anticipated. The identification of additional EAs will need to be a priority for the PPG. A plan for doing so (e.g. the survey sent out, consultations, etc.) needs to be noted in the PFD.

Please note that the main EA categories are listed under the 'Anticipated Program Executing Entity(s) and Type (s)' under the General Information section.

Anticipated Program Executing Entity(s) and Type(s):	Government Agencies, WWF, UNDP, UNEP and other CSOs and Private Sector entities to be defined during PPG
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The consultation process during PFD preparation has been further elaborated in the stakeholder section and in the risk table. Additional narrative on future plans during PPG has also been added. Identification of executing entities will be a priority for the PPG stage, and it is anticipated that there will be some selection of organizations aligned to specific work components during PPG, and there will also be some work that will be tendered out in implementation stage.

4. The program commitment deadline has been added into the portal .
5. Inconsistencies mapped out in the Excel sheet in red font (posted to the Portal and emailed 4/26, including Excel sheet) have been addressed. A new LoEs for Brazil, Morocco and Costa Rica were resecured and are uploaded. Nigeria and India's missing letters have been uploaded too.

Agency's Comments 17 May 2023

1. All Child Project Executing partners were entered into the portal mirroring the LOEs. The programme deadline date was amended to read 31 Dec. 2024

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

Secretariat's Comments

(Karrer, May 17, 2023). Addressed. Rio Markers will be further discussed during PPG.

(Ruat, May 15, 2023). Not addressed.

A Rio marker of 0 is noted for all Rio markers. While this is now fully consistent with the stated objectives of the program and its components, it is also a missed opportunity given that the theory of change of the program has a strong potential of alignment with CCM and BD benefits as it prioritizes upstream action to reduce plastic pollution. It can be noted that should this alignment be made more evident and explicit in the design and objectives of the project, a Rio marker 1 may be justified for CCM.

(Ruat, April 25, 2023). No.

1. Biodiversity is rated as one, however the appropriate selection based on current justification and objectives would be rather 0, except if a significant objective is stated and justified, which does not seem to be the case here ? it is rather a co-benefit contingent to the location of some child projects.

2. CCM is also rated as one, however the appropriate selection based on current justification and objectives would be rather 0, except at some child project level in case CCM is a significant objective (which is not the case in most concept notes at this stage neither at objective, outcome nor output level). At PFD level based on the TOC and related justification of climate change mitigation related objectives and activities, it also does not seem justified as it is not made clear how CCM is impacting the design of the PFD in particular in the way the design is emphasizing upstream action.

Agency's Comments

Agency's Comments 5 May 2023

1. BD was lowered to 0
2. CCM was lowered to 0

Agency's Comments 17 May 2023

The team acted on the 25 April 2023 request for lowering the CCM Rio marker to zero. Consequently, the 15 May request to increase again to 1 and strengthen the alignment with CCM and BD benefits as it prioritizes upstream action to reduce plastic pollution will be further reviewed at PPG.

2. Program Summary

a) Does the program summary concisely describe the problem to be addressed, the program objective and the strategies to deliver the GEBs or adaptation benefits and other key expected outcomes?

b) Is the program's geographical coverage explicit, as well as the covered sectors? Does the summary explain how the program is transformative or innovative?

Secretariat's Comments

(Karrer, May 17, 2023). Addressed. In developing the CER, be sure to make a clear statement that a central tenet of the Program is to have global impact in how the world is addressing plastic pollution. There needs to be a clear statement in summary statements and in Program descriptions that a priority of the Program will be to have global impact beyond the 15 countries and then provide details on how that will be done.

(Karrer, May 16, 2023)

Not addressed. The brief statement in the summary and in the PD (para #12) "The knowledge and lessons shared by the Global Platform will facilitate upscaling of activities among and beyond the countries the Program operates in" does not address the request to consider the impact beyond the 15 countries. The intent to have global impact beyond the 15 countries warrants more than saying it will occur. There needs to be at least a couple of sentences about how this will occur. For example, it's expected that the IP will collaborate with other global initiatives with site experiences (e.g. GPAP, NEP, WRAP, etc) including sharing experiences. This statement also needs to be included in the PD. This point is important since it's part of the justification for being a program.

(Karrer, April 25, 2023)

Throughout the document, including the Program Summary, overview statements about the vision of the IP need to mention having global impact beyond the 15 countries.

Agency's Comments

Agency's Comments 5 May 2023

The PFD summary and narrative have been adjusted to show the impact beyond the 15 countries. One paragraph is added in the summary and in the project description section on how the global platform project will support the success of the Program by facilitating knowledge and lessons sharing across the child projects to create an impact that is larger than the sum of the child projects.

Agency's Comments 17 May 2023

The proposed statement was added in the summary and in para 7.

3 Indicative Program Overview

- a) Is the program objective statement concise, clear and measurable?
- b) Are the components and outcomes sound, appropriate and sufficiently clear to achieve the program objective and the core indicators per the stated Theory of Change?
- c) Are gender dimensions, knowledge management, and M&E included within the program components and appropriately funded?
- d) Are the GEF program Financing and Co-Financing contributions to PMC proportional?
- e) Is the PMC equal to or below 5%? If above 5%, is the justification acceptable?

Secretariat's Comments

(Karrer, May 17, 2023). Addressed.

(Karrer, May 14, 2023). No. Please note Component 2 as Investment not TA. Both TA and Investment are relevant, but Investment is the unique, critical aspect.

(Leonard, April 25, 2023).

1. In the Scope of the Program where notes 'Health risk caused by?', please list the chemicals of concern with examples. And in the bullet 'Plastic products used in hospitality?', please clarify if these plastic products are different from those listed above. If not, please state these are examples of sectors in which the IP will focus.

(Blet, April 25, 2023).

2. The duration of the program is expected to be 8 years. This means that end results will only be communicated and evaluated 8 years after implementation start of the child projects, so likely not before 2033. Please consider a shorter timeframe within 5 to 6 years of implementation to yield similar results.
3. Regarding the Program Objective section - the Program objective statement indicates 'To trigger a system change?' but no indicator is provided to assess that this part of the statement is achieved. To ensure evaluability the Agency may consider starting the statement by 'To transition toward..?'

(Karrer, April 25, 2023).

4. Please clarify with the countries the differences between upstream and downstream measures. Some countries are only noting one 'e.g. India notes they are focused on upstream measures, but then also discuss reuse and refill systems.

(Zimsky, April 25, 2023)

5. In the Programming Directions section, please specify how many countries are pursuing which actions rather than noting 'some?', 'all?', etc.

Agency's Comments

Agency's Comments 5 May 2023

1. Sentences were added to indicate that 63 types of chemicals in food packaging are hazardous to our health and examples were provided. The sector-related text was moved above to indicate these are examples in which the Program will focus.

2. Should the IP PFD be approved in June 2023, the IAs intend to submit the CEO ER for the Global Platform Child Project by the end of 2023 with the hope that it can be CEO endorsed and ready for execution comes July 2024. Fast tracking the global platform child project would allow support to the National Child Projects including setting up all the governance, monitoring and reporting system, TA assistance mechanisms etc to support programme execution as soon as the national child projects are CEO endorsed and ready to hit the road presumably in early 2025 for 5 years. The global platform would also need to factor in time for programme learning codification, show casing and wrap up. Some national child projects argued that they needed 6 years. There will also be inevitable delays hence considering a 8 year duration for the global platform hence for the program seemed quite realistic. Nevertheless, in conversation with the IP Programme Manager at GEF Sec., it was strongly recommended not to extend the programme beyond 6 years. The duration has therefore been amended accordingly both in the PFD and Global Child Project.

3. The text has been nuanced accordingly. The objective is now phrased as : ?To transition towards a circular economy of plastics in the food and beverage sector, and prevent plastic pollution.?

4. While the focus on upstream and midstream has been stressed throughout the country consultations, this will be further communicated during PPG. Additional explanation on the upstream and downstream focus has been added in the PFD with the graph referenced from INC-1 document.

5. Number of national child projects focus on respective topics have been provided.

Agency's Comments 17 May 2023

Component 2 was changed to read Investment alone.

4 Program Outline

A. Program Rationale

a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the program design?

b) Has the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other program outcomes? Is the private sector seen mainly as a stakeholder or as financier?

c) Is the baseline situation and baseline projects and initiatives well laid out and how the program will build on these?

d) Have lessons learned from previous efforts been considered in the program design?

e) For NGI, is there a brief description of the financial barriers and how the program ? and the proposed financial structure- responds to these financial barriers.

Secretariat's Comments

(Karrer May 16, 2023).

1. Addressed. In future explanations, including in the CER, please note CW supported and continues to support plastic related initiatives through POPs reducing projects. And please cull list of projects and correct the titles.

2. Addressed. During PPG, please consult with the countries regarding the awareness and behavior shift campaigns to consider these points.

(Reddy, May 15, 2023)

3. Addressed.

4. Addressed. During PPG, Please address the point that under the Program Rationale section, point number 5 references the transnational challenge of plastic pollution, and point D under 5 references the regional level. However, there is no further reference to how such regional approaches or considerations are to be made in the global project. Also, the role of the private sector needs to be emphasized as one of the enabling conditions, or a lever of transformation as their production facilities, their markets are usually transboundary in nature and not limited to once country. So that engaging key beverage sector actors will have ?beyond the country? benefits into the region and so pilots or market testing with the private sector could lead to bigger scale impacts outside of the country. This is a role of the private sector that is not sufficiently covered. FEMSA for example covers multiple countries, and can move the needle across entire regions. Please incorporate this point here as well as address in the Component 2 Global project activities section related to private sector/corporate responsibility activity.

(Leonard, May 15, 2023)

5, 6 Will review once sent to Council

(Karrer, April 25, 2023). No.

1. In the baseline situation section related to lessons learned, please provide a recap of the past GEF projects noting how this program will build on these. For example, the UNEP global project provided the analysis that is in many ways the framework for this work.
2. In the Root causes section, has consideration been given to the root cause of a highly consumptive culture ? i.e. people are ?taught? to embrace consumption leading to an overly consumptive society? And along these lines, with COVID, there has been a heightened since that plastic equates with cleanliness leading to excessive plastic packaging, which is seen as ?healthy?. This point is relevant to plans for consumer awareness campaigns around reduce and reuse instead of buy new.

(Reddy, April 25, 2023).

3. On the list of private sector entities ? this list is incomplete. It must list more global actors that have influence, including AEPW, which is investing in one project already. It should list WBCSD and importantly the country level BCSDs that operate in the geographies ? and of course the industry associations that have big political pull. Add also consumer goods forum ? CGF.
4. Under the Program Rationale section, point number 5 references the transnational challenge of plastic pollution, and point D under 5 references the regional level. However, there is no further reference to how such regional approaches or considerations are to be made in the global project. Also, the role of the private sector needs to be emphasized as one of the enabling conditions, or a lever of transformation as their production facilities, their markets are usually transboundary

in nature and not limited to once country. So that engaging key beverage sector actors will have ?beyond the country? benefits into the region and so pilots or market testing with the private sector could lead to bigger scale impacts outside of the country. This is a role of the private sector that is not sufficiently covered. FEMSA for example covers multiple countries, and can move the needle across entire regions. Please incorporate this point here as well as address in the Component 2 Global project activities section related to private sector/corporate responsibility activity.

(Sunday, April 25, 2023)

In the Root Causes section, please note:

5. The statement ?State aid and other economic incentives for? fossil fuels?? shows the need for policy coherence to address antagonist policies and strengthen or develop supportive policies and regulations.
6. Item #2 ?Hazardous additives?? is not a valid root cause in the case of this program since it is focused on the food and beverage plastic packaging.

Agency's Comments

Agency's Comments 5 May 2023

1. The Section on ?**Coordination and Cooperation with Ongoing Initiatives and Programs?** describes the relationship with ongoing GEF plastic related initiatives globally. A reference to project GEF ID 9681 and its road map to circularity has been added.
2. A sentence is added under the third root cause to indicate how COVID-19 further intensified unsustainable consumption and production pattern related to people?s consciousness of hygiene, which resulted in the increased use of plastics.
3. It should be noted that the list of private sector entities is purely indicative at this stage. While as described in the PFD under the stakeholder engagement section, brief consultation sessions were held in the lead to the PFD submission, structured conversations will happen during PPG to co-create meaningful partnership arrangement at the global and national levels. It should also be noted that neither UNEP, nor WWF nor UNDP are allowed to be associated to oil and gas companies including AEPW.
4. One additional root cause has been added to explain why innovation and solutions have been limited at small scale, and not yet been uptaken across national boundaries. Further elaboration on how to engage with the private sector to apply the circular solutions identified in this Program into more markets is also provided.
5. A barrier has been added to answer to this cause: ?There also lacks coherent and consistent regulations across countries and regions to develop common solutions and markets for more circularity"
6. More background information has been added on the use of chemicals in the packaging of the food and beverage sector materials, products and service.?

5 B. Program Description

5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the program logic, including how the program design elements are contributing to the objective, a set of identified key causal pathways, the thrust and basis (including scientific) of the proposed solutions, how they provide a robust solution and listing the key assumptions underlying these?

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

c) Are the program components described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the program approach has been selected over other potential options?

d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Have the baseline scenario and/or associated baseline programs been described? Is the program incremental reasoning provisioned (including the role of the GEF)?

e) Are the relevant levers of transformation identified and described?

f) Is there an adequate description on how relevant stakeholders (including women, private sector, CSO, e.g.) will contribute to the design and implementation of the program and its components?

g) Gender: Does the description on gender issues identify any differences, gaps or opportunities linked to program objectives and have these been taken up in component description/s?

h) Are the proposed elements to capture, exchange and disseminate knowledge and lessons learned adequate in order to benefit future programs? Are efforts for strategic communication adequately described?

i) Policy Coherence: How will the program support participating countries to improve, develop and align policies, regulations or subsidies to not counteract the intended program outcomes?

Secretariat's Comments

(Karrer, May 14, 2023).

1. Addressed. During PPG the useful figure will be updated.
2. Addressed. Very useful.
3. Addressed.
4. Addressed.

(Leonard & Karrer)

6 ? Addressed. See first comment about highlighting in CER.

7 ? Addressed; however, the added language is only related to the global project. The comment is also related to the country projects. During PPG the Agencies need to ensure that the country projects will address policy coherency such as identifying and resolving conflicting policies and regulations (e.g. subsidies for virgin plastic production, policies that ban use of recycled plastic for food and beverage containers). As Leonard noted, ?It is just not enough to create new supportive policies/regulations or strengthen existing ones. It is essential to understand if there are contradictory policies or if such are in the pipeline and to address them in an integrated manner. Activities and action should include an analysis of supportive and antagonistic policies/regulations and actions to align policies, including eliminating contradictory policies across different aspects of the economy that could affect the plastic sector (importance of using a systems thinking approach).?

8 ? Addressed . During PPG the Agencies will work with the countries to consider the 5 proposed components and the various strategies.

(Yamasaki & Karrer)

9 ? Addressed.

(Karrer, May 15)

10. * (from March 30th) Addressed. During PPG the commitment to gender-sensitive activities will need more detail in the PD. During PPG specifics regarding gender-related issues will need to be noted in the PDs for the global and country project CERs. For example, when discussing engaging the private sector, be sure to highlight women-owned businesses. For national plans, please ensure women are engaged and the demographic impacts are examined and addressed. The gender analysis and plans will need to consider the role of women in the waste industry, particularly high proportion as waste pickers. It also needs to consider opportunities for women to switch from downstream waste pickers in unsanitary and hazardous conditions to safer, stable, reuse/refill collectors, washers and redistributors.

11. * (from March 30th) Addressed. The Theory of Change diagram is not explained in the text. During PPG for the global project, please elaborate and also ensure the pieces are consistent with previous text (e.g. the ?drivers? box doesn?t match the root causes, barriers or issues lists; the GEBs are not consistent).

(Karrer, April 24, 2023).

1. Figure 3 is excellent and is a great example of the benefit of an integrated program ? to look across the projects and share experiences. Be sure to note this point and reference the figure when adding text related to being an IP. Please note in the text that it will evolve. And please update the figure during PPG. As noted below, the figure allows you to easily see which activities are being considered by countries and discuss with those options.

2. The description of stakeholder engagement discusses engaging them to shift toward more sustainable, circular practices. While this objective is relevant for the private sector, it's not really relevant for CSOs, international organizations, academics and government. Please edit to be clear on why and how to engage the categories of stakeholders listed beyond businesses.
3. A category "Global and regional organizations, initiatives and coalitions working on plastic pollution" is noted, but not the organizations. Please add which will be considered (e.g. GPAP, BBFP, etc.) and note briefly the process for consideration during PPG.
4. Please include discussion of engaging with vulnerable groups, such as waste pickers. As the IP is focused on reuse/refill, there may be employment opportunities for the informal waste picker sector, which is dominated by women and youth. This aspect needs to be considered given the GEF's interest in women and youth sectors.

(Richardson/PPO, April 25, 2023)

5. The PFD indicate that it has consulted civil society but the submission does not include any information on who was consulted. Please provide further details and also incorporate additional information on how these stakeholders will be engaged as part of the development of the Global Platform Project CER.

(Sunday/STAP, April 25, 2023):

6. For the explanation of the IP overall and the Global Child Project in the PFD text, please provide some concrete information on strategic actions through the global project that will help scale up the program, especially on how countries outside of the child projects will be brought in to benefit and possibly replicate. This is important for scaling, durability, and transformation.

7. For Component 1 Enabling a Regulatory and Policy Environment (under the Theory of Change and the b. National child projects sections), it is important to emphasize policy coherence at the global and child project level. It is just not enough to create new supportive policies/regulations or strengthen existing ones. It is essential to understand if there are contradictory policies or if such are in the pipeline and to address them in an integrated manner. Activities and action should include an analysis of supportive and antagonistic policies/regulations and actions to align policies, including eliminating contradictory policies across different aspects of the economy that could affect the plastic sector (importance of using a systems thinking approach). This is essential for ensuring the durability of program/project outcomes and GEBs.

8. All the CNs include policy, private sector and knowledge sharing activities; not all include finance and activating behavior and social change. During PPG it will be important for the Agencies to assess if the child projects that omitted the finance or consumer awareness components might benefit from them. And, if so, work with the countries to incorporate into the CER.

(Yamasaki, April 24, 2023):

9. In Component 3 on page 8, it says "testing of alternative materials, products and solutions to alternatives", which seems to support R&D. Please note GEF funding cannot support R&D. Please delete reference or clarify the funding will come from elsewhere.

Agency's Comments

Agency's Comments 5 May 2023

1. A paragraph is added under the program summary describing how national child projects delivering different sets of activities under components can contribute to the common objective and shared benefits of the program with reference to Figure 3. It is noted that the structure is evolving and will be updated accordingly in the PPG phase.

2. This has been clarified by adding short descriptions of the roles of each category of stakeholder in the stakeholder engagement section on pages 21 and 22.

3. In order to be impartial and non-discriminatory, no specific name of agency or partner are mentioned in the PFD. A structured consultation process building on the survey and the first round of webinars which led to this submission will be organized during the PPG phase of the Global Platform, and a detailed list of partners will be identified and provided in the CEO ER document.

4. New texts has been added on the engagement with vulnerable groups on page 21.

5. New texts has been added on the engagement with vulnerable groups and civil society. A more thorough consultation will take place during the PPG phase of the Global Platform, as well as with national child projects.

6. New text has been provided describing how to scale up the activities beyond the 15 countries, including through the KM component for knowledge sharing, working with the private sectors in more markets, and collaborating with funding partners to implement and replicate in more countries.

7. A new paragraph explaining the policy coherence among 15 child projects and the Global Platform has been added (after table 1).

8. This is noted and will be planned during PPG. Countries were given the PFD TOC and structure and asked to at least contribute to components 1, 3 and 5. At PPG, we will encourage them to look into the missing components (such as finance or awareness raising), either adding them to the project components, or complementing with co-finance or in-kind contribution from other sources or projects.

9. Additional texts has been added to explain that the test will be ?for application in the markets (not at laboratory level).?

5.2 Program coherence and consistency

a) How will the program design ensure resilience to future changes in the drivers and allow for adaptive management needs and options?

b) Is the potential for achieving transformative change through the integrated approach adequately described? How is the program going to be transformative or innovative? Does it explain scaling up opportunities?

c) Are the countries or themes selected as child projects under the program appropriate for achieving the overall program objective?

d) Are the descriptions of child projects adequately reflective of the program objective and priorities as described in the ToC?

e) Is the financing presented in the annexed financing table adequate to meet the program objectives?

Secretariat's Comments

Comments specific to the CNs will be sent separately to be addressed during PPG for the CERs.

The following Global Project CN points needs to be revised for the PFD.

(Karrer, May 17, 2023). Addressed. In Global Project plans please note that for Component 2 the intent is to have global-level activities. While the first paragraph in Para 22 reflecting this thinking, the subsequent text, specifically "support the 15 countries" implies a country focus, which is not the case. Please ensure the Global Project is globally focused.

(Karrer, May 14, 2023)

0. (from March 30th). Not addressed. As written it seems Component 2 is an extension of Component 1 with more technical assistance to the countries, which is not the intent of this component. This component is suppose to be pursuing global-level activities that address global barriers. This distinction is important since global-level activities are part of the justification for having a program. Please replace the text "This will support setting up enabling conditions" apply, assess and improve? to instead state something to the effect "Three critical global barriers have been identified: the lack of globally harmonized definitions, the lack of traceability and transparency in the global trade of plastic products and waste, and the need for innovative financing at the global scale. These three needs will be addressed by the following three global-level activities [existing text on the three]. The 15 countries will play an important role in providing feedback and piloting these activities. For example, for the metrics activity, the 15 countries may be asked for input in developing the metrics; for the trade activity, the countries may be asked to pilot the traceability efforts; and, for the finance activity, as global financing opportunities are identified, they may be connected with the countries to pursue."

0. Comments will be sent specific to the Country CNs, which will need to be addressed during PPG for the CERs.

1. Addressed. During PPG the roles will need to be further defined, including which Agency will lead on C1 TA and on each of the C2 Addressing Global Barrier outcomes. How will oversight of the country projects be handled, including ensuring meeting objectives and addressing problems? Other aspects?

2. Addressed.

3. Addressed.

4. Addressed, including identifying socioeconomic co-benefits.

5. Addressed.

6. Addressed

7. Addressed. During PPG plans for collaborating with plastic-related initiatives outside the IP (e.g. NPE, BFF) will be important to ensure the IP experiences learn from them and also share the IP experiences outside the 15 countries. The final list of how the 15 country project experiences will be replicated emphasizes collaborating with GEF projects, but not beyond so please ensure this point is addressed during PPG.

8. Addressed. In the CER the incremental value of this IP needs to be elaborated and better articulated beyond working more upstream than other global initiatives.

9. Addressed. Gender aspects will be further considered during PPG.

10. Addressed. The helpful explanation provided in the response should be in the text.

11. Addressed.

12. Addressed. During PPG please ensure C2 includes private sector engagement to link to country projects.

13. Addressed. During PPG - Requiring that ?issue cannot be resolved at the national level? for the IP activities means many of the noted topics (e.g. how to create reuse systems) would not be eligible. Please reconsider including. The response notes the criteria were broadened to be for the entire global project, but they are still therefore tied to Component 1 (TA).

14. Addressed. It's not clear that the program through the global project will help support and design a ?go-to? site with plastic reducing resources; instead the language suggests simply sending products to sites. To help foster global knowledge sharing beyond the Program countries and duration, the Program needs to help support (including help fund, design and revise) an existing, recognized website that is a resource for all stakeholders working to reduce plastic pollution. The site might include case study experiences, a virtual easy-to-search library of guidebooks, and other resources, and a LinkedIn-like platform for identifying experts. This idea was discussed at the design workshop and was noted in past comments; yet, it is not mentioned. There is reference to sending KM products to website (?will be shared through various platform to facilitate the scaling-up (such as: the IW: Learn platform, the Green Growth Knowledge Partnership (GGKP), the SAICM knowledge platform, the GPML Digital Platform, EPR One Stop Shop, WEF-WWF-UNEP Reuse Portal).?) which is good, but the plans do not go as far as actually supporting and ensuring a well functioning, useful, useable website. This activity will need a deep dive during PPG to see what exists that the Program can support and how. Please note the proposed Program website (mentioned in the PFD, para 23), has a different purpose, which is to communicate the Program objectives, components, achievements, etc. and since it will end with the Program, it is not intended to be the global awareness site.

15. * (from March 30th). Addressed. During PPG, the Global project component 1

(TA) will need to include not only global expertise, but also providing practical experience and fostering country-to-country experience sharing.

16. * (from March 30th). For PPG. During the design workshop we discussed engaging with global corporations to pilot initiatives in the countries would be an activity in Component 2; however, it is not noted under Component 2 and seems would be relevant under Component 1 within the stakeholder engagement plans. During PPG, please include and elaborate on plans to engage with global corporations and connect them with some of the 15 countries. This could include the big F&B plastic packaging using companies (Nestle, Coke, etc), the growing reuse/refill system companies (e.g. bringing Loop to developing countries, Enviu, PR3) as well as digital solution companies such as Trip Advisor, Google Maps, Yelp, etc. to incorporate sustainability ratings to drive circular choices.

17. *(from March 30th). For PPG. The Knowledge management plans are weak with communication and coordination activities inappropriately included as they are different from KM. During PPG the global project will need to focus attention on this aspect, including seeking outside expertise. As noted but not addressed, KM may include workshops, project site exchanges/twinings, guidebooks/toolkits, a listserv, videos, etc.

(Karrer, April 25, 2023)

1. As noted in the PFD March 30th comments, the roles of UNEP and WWF need to be clearly articulated. There is an explanation that UNEP will lead in C3 coordination and WWF in C3 KS and communication. Who will lead on C1 TA and on each of the C2 Addressing Global Barrier outcomes? How will oversight of the projects be handled, including ensuring meeting objectives and addressing problems? Other aspects?
2. The Advisory Council and Steering Committee are noted as related to the global project, but we expected they would be related to the entire Program because they would be advising on the suite of country projects as well as the global project. Please clarify.
3. The EAs (beyond UNEP, WWF) for the components need to be identified during PPG. Plans for how to identify these needs to be mentioned in the CN.
4. There needs to be noted clear plans for providing guidance on the core indicator methods during PPG as elaborated in GEB indicator comments.
5. Seven years is not justified when Country projects are 4-5 years. 6 months before and after is sufficient. Needs to be reduced to 5 or 6 years please.
6. We discussed for C2 (global barriers) having an outcome on private sector to work with global corporations to pilot initiatives in the 15 countries. This needs to be included and during PPG relevant corporations (not just from USA, Europe but also global corporations based in Asia, LAm, Africa) need to be identified.
7. There needs to be a discussion of working beyond the 15 countries ? learning from and sharing experiences with other countries and global initiatives. The relevant initiatives need to be reflected in the baseline (see next point). Also please explain plans to work with other GEF-8 IPs and past IAPs & IPs, particularly Sustainable Cities and Food Systems, and plans to engage with existing, past GEF investments in plastic activities (e.g. as ?cousins?).
8. The baseline description does not reflect the state of global plastic reducing initiatives. The UNEP, WWF, UNIDO, UNDP descriptions are good (although

UNIDO needs to note where they are working). The GEF section is incoherent ? please edit, including a topic sentence. The non-GEF initiatives are not related to plastics and oddly only two efforts GACERE (which is not plastic focused) and NORAD (if donors was the intent, the UK, USA, and others are funding many plastic efforts). Please provide a summary of non-GEF plastic reducing initiatives (e.g. INC process, GPAP, AEPW, EMF/NPE, BFFP, etc ? see the stakeholder invitee list ? might include as an annex if space is a concern) so it is clear the current baseline and explain how this program will contribute. Efforts by companies also needs to be reflected given the program focus on public-private collaboration. This summary needs to provide an overview of what's missing and how this program will contribute to filling that need.

9. Gender issues are barely mentioned. This aspect will need to be further considered during PPG.
10. It's unclear what is meant by statement ?Engagement in the G20, G7?? ? are you planning that this program will engage in these fora? Please explain as this is not reflected in the PFD, in this global CN or in the country CNs.
11. The stated vision in the Project Description section does not reflect the project plans. It notes coordination and TA, but not the other components ? please edit to note all or none. The vision should be similar to the aim noted earlier in the document.
12. In the section ?Describe how the integrated approach proposed?? component explanations: C1 ?I thought these TA needs were under consideration to be agreed during PPG and even during implementation. C2 ? I thought this was going to be addressing metrics, trade, private sector, and financing (e.g. setting up a global incubator), which is not what's written. And would seem relevant to C1 too.
13. In the ?Describe the project's incremental reasoning?? section ? C1 ?The first criteria is *the issue cannot be resolved at the national level* but many of the issues already identified are national in scope, such as guidance on reuse systems. Also it needs to be clear the topics are TBD during PPG and during program implementation. C2 ? I thought the finance piece was going to possibly include an incubator. C3 ? needs to include information communication (e.g. listserve, whatsapp group) to foster sharing among colleagues in the program
14. Regarding C3 KM ? I understood KM would include supporting an existing or new ?go-to? site with plastic reducing resources. During PPG plans need to be detailed, including how the program will support and feed into existing websites that are (or can be expanded into) a ?go-to? site for countries seeking guidance, tools, examples, and experts on tackling plastic pollution. During PPG existing websites (e.g. GPML, Reuse Portal, others) need to be evaluated to determine what will best work as such a ?go-to? site.

Agency's Comments

Agency's Comments 5 May 2023

1. This has been provided in the Concept Note of the Global Platform but does not fit per se in the template of the PFD . Detailed roles for UNEP and WWF will be further elaborated during the PPG phase of the Global Platform as it relates to leading and shared responsibilities, PMU, TA, KM, communication etc.

2. The Advisory Council and Steering Committee serve for the Global Platform, and they are also overseeing the progress of the whole Program, as the Global Platform is the coordination project of the Program. In the meantime, each national child project has its own Steering Committee to provide detailed guidance on the project implementation at country level. The Advisory Council and Steering Committee will liaise with the national child project committees.

3. Additional text has been added explaining how executing partners will be identified.

4. A new paragraph has been provided explaining the further methodological development of GEBs during the PPG phase of the Global Platform.

5. Despite, the above comments, the duration of the Program has been updated to 6 years.

6. Text has been included to capture this in component 2.

7. Additional texts added to explain how the Program will improve collaboration among existing GEF plastics projects and IPs.

8. The baseline description has been updated to address these comments.

9. Besides the 'Gender Equality and Women's Empowerment' section and other references across the document, gender related text was added 1) in the 'program rationale' to indicate the disproportionate impacts of chemicals in plastic packaging to men and women, 2) in the 'stakeholder engagement' to indicate that the Program will trigger behavior change through a gender lens, and 3) in the 'national child projects' section to indicate the use of gender-sensitive language and gender-balanced images in relevant communication campaigns. During PPG the gender aspects will be further strengthened.

10. The Program will engage in the G20, G7, World Economic Forum, the EMG and CEB processes as well as United Nations Sustainable Development Cooperation Framework (UNSDCFs) in countries to showcase the key achievements of the Program and identify linkages and potential collaboration areas with and via these processes.

11. The vision statement has been updated to clarify how it captures all the program components.

12. The section has been updated to clarify these points and better match the component description in the PFD.

13. The criteria have been moved to reflect that they are relevant to the global platform broadly, not just C1. The first criteria is primarily for the inclusion in C2. The C1 section makes it clear that the topics will be determined during PPG. The incubator and information sharing are captured.

14. The Program will avoid setting up new platform whenever possible, so that we can capitalize on the existing knowledge platforms related to plastics. In the meantime, the Program will set up a dedicated website to showcase the progress and achievements of the Program.

Agency's Comments 17 May 2023

Component 2 was edited following the proposed guidance. See para 22.

5.3 Program Governance, Coordination and Cooperation with Ongoing Initiatives and Programs

a) Are the program level institutional arrangements for governance and coordination, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has a program level organogram / diagram been included, with description of roles and responsibilities, and decision-making processes?

b) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed initiatives, projects/programs (such as government, private sector and/or other bilateral/multilateral supported initiatives in the program area, e.g.).

Secretariat's Comments

(Karrer, May 14, 2023).

1. Addressed. During PPG please ensure the countries understand what it means to be part of the IP ? how they will contribute and benefits. Their role in the IP will need to be clear in their CNs.
2. Addressed. During PPG please elaborate on roles further with more specifics.
3. Addressed. During PPG this will be an important point to discuss with the countries and elaborate in CER based on their input.
4. Addressed.
5. * (from March 30th). For PPG. In planning KM during PPG, consideration needs to be given to working with GEF and non-GEF plastic reducing initiatives. These plans need to be discussed how the IP will work with these.
6. * (from March 30th). For PPG. In the TOC and country plans, currently the reference to refill and use infrastructure at the city or community level is only noted under private sector engagement; however, such infrastructure needs to be considered in the government regulatory component since it requires govt-funded reuse/refill infrastructure.
7. *(from March 30th). For PPG. Table 1: Overview of 15 national child projects is really valuable as a reference as to which countries are working on what and to get a sense of new ideas. During PPG, please update the table based on the CNs (e.g., Cambodia CN notes 5 cities and Laos proposed a Mekong connection).
8. *(from March 30th). For PPG. A short explanation is needed describing cooperation with ongoing initiatives and projects, including potential for co-location and/or sharing of expertise/staffing. Also, please ensure coordination with relevant GEF and non-GEF projects. For example, this June WP includes the FAO sea-base plastic litter project.
9. *(from March 30th). For PPG. During PPG, for the Global Project, there needs to be an explanation of how this Program will contribute to the global initiatives underway previously noted (e.g. GPAP, GPML, etc). What is the value added of this Program?

(Karrer, April 25, 2023).

1. In general from reviewing the CNs, the countries do not seem to be fully understanding what it means to be part of the IP ? both how they can benefit and how they will be expected to contribute. Some countries (e.g. India, Cook Islands, Brazil) note interest in sharing experiences but don't discuss interest in learning from the other countries. Some countries mention benefiting from the global project technical

assistance (e.g. India even noted a few particular topics of interest), but other countries (e.g. Cook Islands, Brazil) don't even mention this aspect. Finally, many countries don't mention how they will be engaged in the Addressing global barrier activities e.g. testing metrics, engaging with private sector, testing trade & traceability efforts, putting forward innovators for blended financing/incubator, testing metrics. It seems the countries are not fully aware of how they will be expected to contribute to the IP and how they will likely benefit. This fundamental part of the IP needs to be conveyed by the LAs during the PPG and how the countries will benefit and contribute from the IP elaborated in each Pro Doc.

2. The roles of UNEP and WWF need to be clearly articulated. An organogram may be helpful. There is an explanation that UNEP will lead in C3 coordination and WWF in C3 KS and communication. Who will lead on C1 TA and on each of the C2 Addressing Global Barrier outcomes? How will oversight of the projects be handled, including ensuring meeting objectives and addressing problems? Other aspects? Also, where will the PCU be based?
3. Please explain how UNEP/WWF plan to oversee the 15 country projects to ensure meeting project goals while adapting to changes in circumstances.
4. Please elaborate on coordination and cooperation with GEF and non-GEF financed initiatives.

Agency's Comments

Agency's Comments 5 May 2023

1. There has been little time in the last two months for countries to interact with each other, as most effort have been made to develop the Concept Notes for the national projects and chasing LoEs. During PPG for both the Global Program and national child projects, structured dialogue will be organized with all OFPs and national child project partners to improve mutual understanding and potential areas of collaboration which will be reflected in the CEO ER documents for the relevant national child projects and for the global platform.
2. A paragraph outlining major roles and responsibilities is included in the Global Platform CN. The detailed roles of UNEP and WWF will be further elaborated during the PPG phase of the Global Platform, regarding leading and shared responsibilities and budget on PMU, TA, KM, communication etc.
3. UNEP and WWF will utilize adaptive best management practices and apply learnings from existing initiatives to meet the Program goals and adjust to changing circumstances. The topic of plastic is dynamic and all successful initiatives related to this topic must be adaptable, therefore both UNEP and WWF have experience already operating initiatives under these conditions. Several of these adaptive strategies are already outlined in the documents, including reserving resources for both TA and Global Barrier topics and utilizing a semi- annual survey process to assess national child project needs and adapt workplans on an on-demand basis. Additionally, the Global Binding Instrument on Plastic Pollution is a clear and influential inflection point which is expected in early 2025, intersecting with the Program timeline. UNEP and WWF have taken specific Program design measures to ensure the Program is able to adapt and align with the outcomes of the Global Binding Instrument (such as aligning with known Instrument priorities) and also will review project plans after each INC meeting to assess any necessary adjustments to create alignment and / or address gaps.
4. Additional information has been added to the PFD and the Global CN on this topic

5.4 Program-level Results, Monitoring and Reporting

a) Are the global environmental benefits and/or adaptation benefits identified? Does the PFD describe how it will support the generation of multiple environmental benefits which would not have accrued without the GEF program?

b) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01/GEF/C.54/11/Rev.01)?

c) Are the program's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) / adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

d) Other Benefits: Are the socioeconomic benefits resulting from the program at the global, national and local levels sufficiently described?

e) Is the described approach to program level M&E aiming to achieve coherence across child projects and to allow for adaptive management?

Secretariat's Comments

(Karrer, May 17, 2023). Addressed.

(Karrer & Bleit, May 16, 2023)

o Expected results from Core and sub-Indicators need to be set with a view to be achieved by child project completion (in this case within 6 years) and include only direct results from project activities in line with principles set in the GEF-8 RMF guidelines (GEF/C.62/Inf.12/Rev.01), except for the GHG emission indicator. This includes redressing/apportioning targets to what can be directly achieved within the context of each project and editing the following explanations of targets to reflect the change:

? Therefore, a timeline of 10 years has been used to estimate, with the intention of differentiating between the achieved impacts at the time of the Program end, and projected impacts from continuing interventions (e.g. a policy put in place during year 4 of the Program will continue to result in benefits after the Program ends).

? This annual avoided residual plastic waste for each country is totaled and then multiplied by an estimated 10 years, to reflect the duration of the global project (~8 years) and an additional two years? projected impact due to the continued impact of interventions past the end of the project lifetime.

3. Addressed. This will need to be further resolved during PPG.

4. Addressed. This will need to be further resolved during PPG.

5. Addressed

6. Addressed. Please ensure during PPG that the countries do not include MPA coverage as a core indicator.
7. Addressed. Please ensure during PPG that the countries do not include landscape coverage as a core indicator.
8. Addressed. As discussed in the design workshop, during PPG discussions will be held, including with GEF BD colleagues and STAP, regarding what is appropriate to include (if anything). If it is agreed to include this indicator, then a methodology will need to be developed for a realistic estimate of the habitat that will be improved consistent with child project sites locations and their theory of change.

9. Addressed. The explanation for core indicator 7 (Shared water ecosystems under new or improved cooperative management) being 1 is based on the subindicators. However, the core indicator is not a sum of the subindicators, which are only contextual. Instead the core indicator is defined as, "the commitment of countries to cooperatively manage a shared water system (e.g., river, lake, groundwater, or large marine ecosystem). Projects may cover one or more shared water systems. It is based on how many anticipated. See p20 of the GEF-8 Indicator Guidelines (https://www.thegef.org/sites/default/files/documents/2022-09/Results_Framework_Guidelines_2022_06_30.pdf) for more details. Consequently, the basis for indicator 7 value of 1 needs to be explained in the justification section to reflect the indicator's definition. Presumably it is based on the Laos project, which plans to work with the Mekong River Commission toward improved cooperative management.

10. Addressed. While the number can be refined during PPG based on consultation with the countries, for the PDF the number still needs to be refined to be within reason. 34 million beneficiaries is not reasonable as explained in the comment earlier. Please reevaluate this amount and provide a realistic estimate with an explanation in the methodology explanation. During PPG this number will need to be further refined based on consultations with the countries.

(Ruat, May 15, 2023)

11, 12, 13, 14 & 15

During PPG, the following issues need to be considered:

Amounts : The estimate for Core indicator 6 has dramatically reduced to reach 6,021,881 tCO₂ (from 17,050,093 tCO₂ according to documentation shared). This is far below the expected impact of this program and raises the question of whether sufficiently impactful activities are included in the design of child projects and of whether sufficient emphasis is given to upstream action. It would be relevant for the agencies to reconsider the design of child projects to maximize impact and ensure that GEF funding focuses on the incremental cost of achieving GEBs.

Methodology, currently the requirements for a rigorous estimate are all postponed to the PPG phase which is not in line with Guidelines and the resulting calculation lacks robustness, which ultimately raises a question of eligibility of activities financed.

1) Emission Factors for recycling and production avoidance : An averaged emission factor is used for the calculation, assuming a 50%/50% repartition of reduced pollution through recycling and through avoidance of production. This is not in line with GEF Guidelines that state that the most detailed emission factors possible should be used for the calculation ? recycling and avoided production can not be merged as a single emission factor. The assumption made by the agency here is that a 50%/50% repartition of the effort between recycling and avoided production is made wherever data is not available on the actual estimated repartition of effort. In other words, an average would not be justified on emission factors, but it may be on the activity data on reduced pollution >> i.e. instead of averaging two emission factors, the activity data could be split in two provided that the proportion of this repartition is justified by the agency, as an interim solution.

2) Other emission factors to be considered: An explanation was introduced on the various factors that may induce variations in emission reductions but this is not connected with the very clear Theory of Change and related lifecycle of plastics that is introduced above in the PFD. Emissions related to different types and scope of reuse for example are not mentioned, nor those related to remanufacturing, and the exercise of identifying the relevant levers of pollution reduction and their emission factors is fully postponed to the PPG phase. >> It would be useful to explicitly confirm that these will be considered as they are part of the project description.

3) Consistency with the theory of change: the current methodology includes a general estimate of what share of national plastic pollution is expected to be reduced by the project. There is however no connection made to the actual types of activities that this project will implement. As per Guidelines, for all GEBs (including GHGs), a justification for the level of expected values should be provided and explain the methodological approach and underlying logic or causal pathway adopted, considering barriers, enablers, risks and assumptions. >> These causal chains could be made more apparent in the PFD in one or two sentences based to the TOC.

4) Consistency with TOC in child projects: in the core indicator section, the space for justification of the core indicators is used by generic text replicating the PFD description >> As noted above regarding consistency with the TOC, child project concept notes should use this space to clarify where their estimates come from in terms of the percentage of reduced plastic pollution that is attributable to the project. Almost none of the concept notes provide justification for these numbers or related assumptions which is inconsistent with GEF guidelines.

5) For reference, the following child projects provide some level of justification but have other issues:

? South Africa, which tailored the calculation to the plastic production context of the country and provides numbers on volumes recycled and reused ? it however does not clarify how the numbers refer to a baseline and alternative scenario and what plastic pollution reduction is attributable to the project.

? India, which explains assumptions but however does not detail which emission factors are used and if they are as granular as the activities identified

? Dominican Republic which provides some level of references to national data, but does not justify why 15% of the NDC estimate for the waste sector is representative of plastic pollution addressed by the project.

? Lao, which provides a source for the share of plastics waste, but no justification on how it is expected to be reduced in connection with the project

? Morocco, which provides references for emission factors related to uncontrolled combustion but no information on other emissions nor on how it will be reduced compared to a baseline.

? Philippines where some justification is provided on share of recovery, but none on what emission factors are used and on how the numbers to a baseline and alternative scenario and what plastic pollution reduction is attributable to the project ? further, it uses an impact repartition method which is unclear (as per guidelines there should be no discounting for future emissions).

? Senegal which refers to a study on plastic waste entering the ocean but does not provide justification for its calculation of GHG emission reductions

Timeline: The use of timeline is inconsistent across child projects. Most use 10 years but some use 5 (for example Dominican Republic, India, Philippines), with no explanation of this difference. A harmonization of these calculations would be useful. Furthermore, as per guidelines, the timeline for calculation for GHG emissions can include a post-project period which is consistent with a 10 year horizon depending on the cases as noted by the agency. This may however not be justified for other GEBs : as per guidelines, Expected values should be based on what the GEF-financed project and program can achieve by its completion and report as such in Terminal Evaluations. They should be based on past trends, professional judgment and an assessment of what is likely to be achieved considering available resources and planned activities. Only the indicator tracking Greenhouse Gas emissions mitigated assesses results to be achieved over the lifetime of the investment.

-
Indicator taxonomy: Some child projects refer to indicator 6.7, others to 6.8, others to 6.2. At It is understood that at this stage all of these refer to indicator 6.8 (indirect emissions reductions outside AFOLU sector).

(Sookdeo & Swain, May 15, 2023).

16. Addressed. During PPG further discussions may be needed regarding indicator #9.

17. Addressed. During PPG, the Agencies will need to work with the countries to ensure the 9 sub-indicator levels are reasonable.

(Karrer, May 14, 2023)

18. Addressed

19. Addressed. During the PPG the Results Framework for the program (based on Table B) will need to be developed and included in the Global Platform Project CER. The RF will need to reflect on the indicators (GEF core indicators and others) related to the outcomes.

(Karrer & Zimsky, May 14, 2023)

20. Addressed. In the M&E section there are indicators beyond the GEF Core Indicators, which are very helpful to be able to assess impact for this program. We appreciate the focus on upstream and midstream indicators. Given the benefits to marine biodiversity, we suggest also including an indicator related to the amount of reduced plastic going into the ocean. And, given a few of the CNs noted MPAs, we suggest considering MPA levels in particular. This can be determined during PPG as part of the discussions regarding including core indicator 5 on improved marine habitats.

21. Addressed. Given the components relate to policy, during PPG for the RF, changes in business practices, etc, consideration also needs to be given to program-specific indicators related to these plans -e.g. number of policies, number of changes in business practices, etc.

(Leonard, April 25, 2023)

1. The Program Summary ends noting co-benefits; however, these are never elaborated. Please add a paragraph on co-benefits. Note that co-benefits are benefits outside the GEF core indicators and could be environmental, social or economic. Example of environmental co-benefits include air pollution reduction, elimination of chemicals not directly targeted by the GEF MEAs, reduced local freshwater pollution etc. Social co-benefits include human health, enhance food, nutrition, water, and energy security, improved labor condition and safety, social equity and diversity, etc. Economic co-benefits job creation, improved income, alternative livelihoods created, etc.

2. In the M&E section the indicators beyond the core indicators are useful. However, given that the core objective of GEF-8 IPs is to catalyze transformation, it is important to include metrics that help demonstrate that transformation is happening or being catalyzed.

STAP has defined 5 lead indicators to consider for transformation: capacity for change, governance and policies, multi-stakeholder dialogues, innovation and

learning, and financial leverage. Some actions that could catalyze transformation have been included in different aspects of the global and child projects, for example, technical assistance (can support building the capacity for change), regulatory and policy environment and addressing global barriers (governance and policy metric), private sector and external organization engagement (multistakeholder dialogue metric), and component 2 in ToC address the finance leverage metrics). I will encourage that we define them as indicators for the program. This is an expectation from all GEF-8 IPs.

(Karrer, April 25, 2023)

3. The PFD table of indicators should be a summation of the CNs since that's the basis; yet this is not the case for all the indicators. Please check and for indicators that are not a summation, please explain the basis. In some cases you may believe the countries are overestimating in which case need to work with the countries to reduce their estimates.
4. Please note the CNs vary in their approach to addressing these GEBs, including some are using methods different than provided by UNEP/WWF. Please ensure consistency or indicate if you agree with using different methods (e.g. if they have a deeper analysis, more precise data). The justification section needs to be clear on the basis for the calculations, including inconsistencies.
5. Regarding the core indicator calculations, during the PFD design workshop we agreed on methods for the following indicators: 9.8 (avoided residual (not recycled) plastic waste), 7.3 (marine national reforms), 7.4 (IW Learn engagement), 10 (POPs to air), and 11 (beneficiaries). Please ensure estimates are included for these for all CNs.

Also during the design workshop we discussed if/how to include the following indicators: 9 (hazardous chemicals), 5 (improved marine habitat), 6 (GHG emissions), and 7 (transboundary governance). The points raised during the workshop (and summarized in my email of April 10), still need to be addressed as follows.

6. C2 (MPAs created or under improved mgt) ? some of the CNs note this indicator; however, given the GEF-8 Results Measurement Framework Guidelines (GEF/C.62/Inf.12/Rev.01) guidance for this indicator, it is not considered relevant for this IP, which is not pursuing MPA management effectiveness. Please advise the countries not to include this indicator.
7. C4 (area of landscapes under improved practices) ? some of the CNs note this CI; however, given the Guidelines for this indicator, it is not considered relevant for this IP. Landscape benefits are considered too removed from the project activities. Please advise the countries not to include this indicator.
8. C5 (Improved marine habitat) ? A few countries already included this indicator; however, in some cases they included a huge area (e.g. entire EEZ). Including such large areas is unrealistic given the scope of the IP activities. Given this indicator needs further reflection, for the PFD please do not include this indicator. As discussed in the design workshop, during PPG discussions will be held, including with GEF BD colleagues and STAP, regarding what is appropriate to include (if anything). If it is agreed to include this indicator, then a methodology will need to be developed for a realistic estimate of the habitat that will be improved consistent with child project sites locations and their theory of change.

9. C7 (Number of shared water ecosystems (fresh or marine) under new or improved cooperative management) ? Please note that the values for the subindicators 7.3 (national reforms) and 7.4 (IWLEARN engagement) are contextual and do not sum to the indicator. Consequently, the basis for indicator 7 value of ?1? needs to be explained in the justification section. Presumably it is based on the Laos project, which plans to work with the Mekong River Commission toward improved cooperative management.

10. C11 (# beneficiaries Karrer & Bleit)? The number is very large. Most countries noted the entire populations of the area covered by the project (e.g. Cook Is included their entire national population while India and Brazil included both city populations). Please review the number and advise the countries to ensure they only include direct beneficiaries. Pages 24-25 of the GEF-8 Results Measurement Framework Guidelines (GEF/C.62/Inf.12/Rev.01) provide examples of what might be counted as direct beneficiary. For example, most citizens of a country benefiting from a policy measure should not be necessarily counted as direct beneficiaries, as is currently the case with couple child project concept notes. Instead it may be worth considering indicating as direct beneficiaries people whom are directly engaged in the activities described.

C6 (GHGs mitigated):
(Ruat, April 25, 2023)

11. Currently the PFD does not describe and estimate core indicator 6 using the methodology and adhering to the overarching principles included in the corresponding Guidelines. The lead agency claims that the tool has been vetted by the GEFSEC. This is incorrect, the GEFSEC did not vet this tool, and pointed ways for the estimate to clarify how it conforms to guidelines (see email sent by Leah April 20), which are reiterated as follows.

At PFD stage, please:

- a) recategorize the amount reported as Indirect GHG emission reductions outside of the AFOLU sector (from CI 6.7 to C.I 6.8), while indicating in the justification section for the level of expected results on GHG emissions in the PFD that the proportion of expected results across Direct and Indirect is likely to change to account for refined analysis and additional evidence during child project preparation. At this stage there is indeed no justification that shows how this impact adheres to the definition of direct impact as per Guidelines.
- b) provide a source and/or justification for the choice of emission factors which are currently not provided (other reliable sources suggested a slightly higher carbon footprint of plastic (compared to 1.5 in the excel sheet) and ~ 2.9 kg of CO₂e for every kg of plastic burned (compared to 4.5 as per the excel sheet). Here enclosed a useful resource on the matter of emissions factor for different types of plastic from various sources (in particular relevant for projects targeting specific industries, noting other sources may exist):
<https://ccsi.columbia.edu/sites/default/files/content/COMET-making-plastics-emissions-transparent.pdf>
- c) clarify to the extent possible in the justification section how the calculation fits with the theory of change of the project and the causal chains leading to impact - in particular, what are the main mechanism of emission based on TOC that projects will use (e.g., reduce, reuse, recycle ? as these do not have the same emission factors). This will be an entry point for further refinements in the calculation that will be performed by CEO ER stage. In particular, recycling and remanufacturing plastics on average between 30% and 80% of the carbon emissions that original processing and manufacturing produces. In the current sheet these are considered as equivalent to reduced demand/avoided production which does not incentivize upstream action and contradicts the program TOC.

12. At CEO ER stage, the following modifications are expected:

- a) a recategorization on a case by case basis as appropriate across direct and indirect impacts based on more detailed causal chains linked to TOC of projects and on GEF Guidelines principles and definitions; and,
- b) on this basis further granularity in emission factors (parameters) and activity data (input) as appropriate depending on which activities are expected to lead to impact.

13. The estimate results are lower than what would be expected given the size of the investment and the GEB potential of transformative action in participating countries which represent some of the largest sources of plastic pollution. There is little information available in concept notes to justify the estimates of percentages of plastic pollution expected to be reduced attributable to this project which constrains the analysis of ways to maximize this potential, in line with the overall theory of change of the PFD (which focuses on upstream action, which has a higher mitigation potential). The TOC should be better reflected in country projects to clarify how upstream action will be sought to maximize CCM benefits.

14. Please clarify the contradiction between official project timeline reported on the PFD which is 5 years, and the time used for GEB calculations which is 8 to 10 years. Please also clarify why some country projects use 5 years and others use 8 or 10. Please also note that for CI.6, the timeline used is the lifetime of the investments. It is noted that this will be further refined at CEO ER stage for child projects.

15. Please clarify, whichever tool is used, how the attribution factor has been determined and provide a justification. Here again, some country concepts do not use the same methodology and tool as the one mentioned in the PFD. These rely on a similar approach of attributing a percentage of reduction of plastic pollution related GHG emissions to the project. However, it is not justified what is the reason for choosing this level (for example 15% in Dominican Republic).

C9 (Hazardous chemicals)

(Anil and Evelyn, April 10, 2023)

16. An estimate for this indicator is missing for the PFD; however GEF Sec has not agreed to remove this indicator. Please provide information on the basis for this decision and if you have conducted a value chain assessment of the entire lifecycle of F&B plastic packaging. Such an assessment would include examining chemicals in the production of the materials for plastic packaging (e.g. plastic bags, to-go containers, soda bottles) and /or used in the processing to make the packaging. To help resolve this issue, please bring in Ludovic/UNEP who has been working on similar calculations for the Hazardous Chemicals Supply Chain IP and Sunday who is from STAP to work together to determine what is viable to calculate for this indicator for this IP. An estimate needs to be provided at PFD stage that can then be further refined during PPG.

17. For the CNs, please ensure in their tables they indicate if they are estimating for 9.1 or 9.8. Brazil for example noted for 9 in the table, but in methods indicated is reflective of 9.8.

Overall (Karrer, April 25, 2023)

18. For timing, we encourage resolving these issues and calculating accurate GEBs as much as possible in the PFD for Council approval because doing so will: (i) confirm the

relevance, additionality and cost-efficiency of the program, which is especially important as an integrated program that should have multiple GEBs, (ii) ensure upgrades at PPG stage are resolved on a sounder basis. For example for GHG emission factors, it will be clear which ones have to be identified in the literature during PPG based on the mechanisms of emissions identified in causal chains at PFD stage ? so far every plastic pollution reduction is considered equivalent by the PFD calculation, when actually recycling vs reusing vs avoiding does not produce the same impact (if GEBs are identified as insufficient, then perhaps the components should be revised to focus more on avoidance compared to recycling). The PFD should give a mandate on which refinements should be prioritized, otherwise we will end up with child projects that will not deliver on our expectations and may include a lot of traditional waste management activities (this was already identified in several child projects for this IP). In short, by clarifying the principle of refinements during PPG will be made easier if these entry points are well identified and mandated at PFD stage.

19. During the PPG the Results Framework for the program (based on Table B) will need to be developed and included in the Global Platform Project CER. The RF will need to reflect on the indicators (GEF core indicators and others) related to the outcomes.

(Karrer & Zimsky, April 25, 2023)

20. In the M&E section there are indicators beyond the GEF Core Indicators, which are very helpful to be able to assess impact for this program. We appreciate the focus on upstream and midstream indicators. Given the benefits to marine biodiversity, we suggest also including an indicator related to the amount of reduced plastic going into the ocean. And, given a few of the CNs noted MPAs, we suggest considering MPA levels in particular. This can be determined during PPG as part of the discussions regarding including core indicator 5 on improved marine habitats.

21. Given the components relate to policy, during PPG for the RF, changes in business practices, etc, consideration also needs to be given to program-specific indicators related to these plans -e.g. number of policies, number of changes in business practices, etc.

(Bleit, April 25, 2023)

22. Please consider adding a justification to the level of expected results and presenting the methodology used in the section just below the Core Indicator fields. This is particularly important to document how the new sub-indicator on plastic was used.

Agency's Comments

Agency's Comments 5 May 2023

1. A paragraph has been added to explain the co-benefits, which will be further developed during the PPG phase of the Global Platform.

2. We agree it will be important to include metrics demonstrating transformation, and plan to define these during the PPG phase and further work with national child projects on this during their preparation phase as well.

3. This has been updated, and additional information on indicator calculations added in the explanation section below the table.

4. Additional information has been added to the explanation.

5. See below for specific responses

6. It has been removed from the PFD core indicator table and review. While countries were informed about the limited relevance, we have not received any responses at this stage hence some CN?s still include this metric. This will be further revised during PPG.

7. It has been removed from the PFD core indicator table and review. While countries were informed about the limited relevance, we have not received any responses at this stage hence some CN?s still include this metric. This will be further revised during PPG.

8. It has been removed from the PFD core indicator table and review. While countries were informed about the limited relevance, we have not received any responses at this stage hence some CN?s still include this metric. This will be further revised during PPG.

9. For Core indicator 7, it has been assessed that at concept phase national/local reforms and active participation of Inter-Ministerial Committees as contemplated in sub indicator 7.3. have not been taking place (hence a one rating) and that the child projects are not yet connected to IW: LEARN (sub-indicator 7.4) hence again a 1 rating. 10. We have highlighted this concern to the national child projects, but we have not received adjusted numbers. We will discuss this again with the national child projects in the next phase. This same explanation has been provided below the core indicator table. One should also note that a zero value is not permissible in the portal as it is rolling out the rating from 7.3 and 7.4.

10. We have highlighted this concern to the national child projects, but we have not received adjusted numbers. We will discuss this again with the national child projects during PPG.

11. This has been incorporated to the extent possible given the current level of detail in the CNs.

Emissions factors have been updated, aligned, and justified with further references and explanatory text. However, specific causal chains for each national child project are not possible to construct at this time as project activities are not yet specific enough. Therefore, an estimate based on best available information has been applied across all national child projects, and a more specific calculation will be done in the next phase.

12. This will be addressed at CEO ER stage as indicated.

13. This will be addressed with the national child projects during PPG.

14. An explanation has been added to the GEB explanatory text. This approach was discussed and aligned with STAP during the design workshop.

15. An explanation has been added to the GEB explanatory text. This approach was discussed and aligned with STAP during the design workshop-.

16 & 17 . The UNEP/WWF technical team flagged the relevance of CI 9 to the plastic IP. The team has thus compiled a literature summary which shows it has not been possible to identify a baseline for COCs or POPs in food and beverage plastic packaging, nor was the team able to identify a credible methodology to estimate and quantify reductions in COCs or POPs. Please see the supporting information we have provided on this indicator via email on 5/4 to Leah Karrer. All contributions across CNs are to 9.8. The CN template does not call for a breakdown per sub-indicators but the sub-indicators were added in the portal.

18. All GEBs/CIs were revised, updated and a revised explanations was included below the CI table.

19. Indeed it will be addressed during PPG as normally the case.

20. While this does not seem to fully in alignment with the above comments, we will indeed look further at the matter during PPG.

21. This will be addressed at PPG indeed.

22. Additional information has been added below the core indicator fields

Agency's Comments 17 May 2023

Core indicators were amended and so were the explanation in para 58 and 59.

5.5 Risks to Achieving Program Outcomes

a) Are climate and other main risks relevant to the program identified and adequately described? Are mitigation measures outlined and realistic? Is there any omission?

b) Are the key risks and mitigation measures that might affect implementation and the achievement of outcomes adequately rated?

c) Are environmental and social risks and impacts adequately screened and rated and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

(Bleit/PPO, May 15, 2023) Addressed

(Bleit, April 25, 2023)

Regarding risks to program outcomes - please consider describing the risks faced by the program in further details, to complement the more comprehensive presentation of mitigation measures.

Agency's Comments

Agency's Comments 5 May 2023

The risk section has been refined and will be further developed during PPG

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

6.1 a) Is the program adequately aligned with Focal Area and IP Elements, and/or LDCF/SCCF strategy?

***For IPs: is the program adequately aligned with the Integrated Program goals and objectives as outlined in the GEF 8 programming directions?**

Secretariat's Comments Yes

Agency's Comments

b) Child project selection criteria: Are the criteria for child project selection sound and transparently laid out?

Secretariat's Comments Yes

Agency's Comments

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

Secretariat's Comments Yes

Agency's Comments

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat's Comments Yes

Agency's Comments

7.2 Environmental and Social Safeguards

Have safeguard screening document and/or other ESS document(s) attached and been uploaded to the GEF Portal? (annex D)

Secretariat's Comments Yes

Agency's Comments

8 Other Requirements

Knowledge Management

8.1 Has the agency confirmed that a project level approach to Knowledge Management and Learning has been included in the PFD?

Secretariat's Comments Yes. Please note that during PPG specific plans for knowledge sharing among the projects and beyond the projects will need to be planned for each country project. These plans will need to include funding, which has been discussed at the level of 10-20% of each country project to ensure they can adequately share with, and learn from, other plastic-reducing initiatives.

Agency's Comments

9 Annexes

Financing Tables (Annex A and Annex H)

9.1 GEF Financing Table:

a) 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):

Country STAR allocation?

Secretariat's Comments

(Karrer, May 14, 2023)

1. Addressed.
2. Addressed. This amount will be reviewed during PPG.

(Karrer, April 25, 2023)

1. Regarding financing, please clarify the basis for the PFD funding allocations by components. These do not seem to be based on summing-up the CN allocations. Please clarify.
2. Also, \$4.4M for M&E seems high ? that?s 4% of the overall budget.

Agency's Comments

Agency's Comments 5 May 2023

1. The PFD cost breakdown was done based on rough cost estimates per component according some consideration to the CP costings but noting that there isn?t a one to one match between the result framework/project structure of the national child projects and the result framework/programme structure of the PFD. This will be further reviewed during PPG including with cost roll out guiding principles.
2. As per IA guiding principles, M&E is normally budgeted at 3 to 5% of the total budget in function of the project size and complexity hence while this will be further reviewed during PPG, it is considered a reasonable percentage.

Non-STAR Focal Area allocation?

Secretariat's Comments Yes

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments

Agency's Comments

SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat's Comments

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments

Agency's Comments

IP Set Aside

Secretariat's Comments Yes

Agency's Comments

IP Contribution

Secretariat's Comments Yes

Agency's Comments

For Child Project Financing information (Annex H)

b) Are the IP Matching Incentives amounts correctly calculated according to the country STAR focal areas? allocated amounts? Are the IP contributions aligned with the Program? The allocated amounts (including Agency Fee) match those in LoE?

c) Project Preparation Grant Table: Are the IP Matching Incentives amounts correctly calculated according to the country STAR focal areas? allocated amounts? The allocated amounts (including PPG Fee) match those in LoE? Is the requested PPG within the authorized limits set in Guidelines? (pop up information?) If above the limits, has an exception been sufficiently substantiated?

d) Sources of Funds Table: Are the allocated sources of funds for each and every one of the three STAR Focal Areas within the Country's STAR envelope by the time of the last review?

e) Indicative Focal Area Elements Table: (For IPs) The selected Indicative Focal Area element corresponds to the respective IP?

f) (For non-IPs) The selected Indicative Focal Area Elements are aligned with the respective Program?

g) Co-financing Table: Are the indicative expected amounts, sources and types of co-financing provided and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's Comments

Secretariat's Comments

•(Karrer, May 17, 2023). Addressed

•(Parhizkar, May 16, 2023) Not addressed.

•a) Consistently with previous comments on the same issue, please include WB as co-financier (instead of World Bank Loan) and Donor Agency as Source of Co-financing .

•b) Please revise ?others? to GEF agency if the agency is (co)implementing agency ? if not co-implementing, it will be ?donor Agency).

•c) Please also clarify which ?GEF Agencies? are these: if not identified, please remove them as at PIF stage, co-financiers have to be identified.

d) Please identify who ?Tourism sector? and Municipalities? are ? if not identified, please remove them as at PIF stage, co-financiers have to be identified.

(Karrer, May 14, 2023):

1. Addressed. Thank you for adding the co-financing table that shows sources (government, private sector). Very helpful.

2. Addressed.

(Reddy, May 14, 2023)

3. Addressed. During PPG more detail on the co-finance will be provided. At that time, please seek blended financing in the support of global project initiatives. There are many de-risking opportunities in schemes where conventional finance or direct value chain finance wouldn't be able to manage new business model risks.

(Karrer, April 25, 2023):

1. Please explain the basis for the co-financing listed in the Program Components table (p6).
2. In the co-financing table, is it possible (I'm not sure the Portal allows this) to clarify the noted co-financing so clear which country project they are related to? Otherwise it's unclear the basis of many items.

(Reddy, April 25, 2023)

3. Realizing that more detail on the co-finance will come at the PPG phase, please seek blended financing in the support of global project initiatives. There are many de-risking opportunities in schemes where conventional finance or direct value chain finance wouldn't be able to manage new business model risks.

(Parhizkar, April 25, 2023)

4. Regarding the co-financing table, please make the following corrections (see email posted in Portal for specific screenshots).
 - a) UNDP is GEF agency. Please change "Donor Agency" to "GEF agency".
 - b) World Bank is GEF agency. This loan seems to be committed by the World Bank. If so, please change "Recipient Country Government" to "GEF Agency".
 - c) Please revise "others" to GEF agency if the agency is (co)implementing agency (and clarify which "GEF Agencies" are these), otherwise include "donor agency".
 - d) The agency has classified several "Type of Co-financing" as "Other". It would be great to revisit this field once more to ensure they are correctly labeled as "Other".

Agency's Comments

Agency's Comments 5 May 2023

1. The rationale for the Programme co-financing is explained below the co-financing table
2. This is the best one could do given the portal options . Co-financing will be further finessed during PPG
3. Further blended co-financing opportunities including with the private sector will be explored during PPG
4. Corrections were made for 4.a. 4.b remained as such as the loan taken by the country which is charged of its reimbursement hence the labeling "recipient country" was maintained. 4.c The CF from GEF agencies is not yet confirmed. While the amount is requested by the country, it could come from UNEP and/or WWF and will be confirmed at CEO ER. The "other" labelling was carefully reviewed and remains as such for now pending further review during PPG.

Agency's Comments 17 May 2023

a) While the requested were enacted for Cambodia, one should note that this corresponds to a loan that the country is reimbursing hence the previous entry acknowledging the co-financing against the country.

b) & c) The Cook Islands requested CF from Programme IAs namely WWF and UNEP. UNEP is the IA for the CP while WWF will be a co-financing partner whose contributions will be finessed during PPG. Changes were done accordingly to reflect UNEP as GEF Agency and WWF as donor agency.

d) Cook Island Tourism sector was qualified so were Costa Rica municipality.

9.2 Project Preparation Grant (PPG): if PPG for child projects has been requested: has the PPG table been included and properly filled out adding up to the correct PPG and PPG fee totals as per the sum of the child projects?

Secretariat's Comments Yes

Agency's Comments

9.3 Sources of Funds for Country STAR Allocation

Does the table represent the sum of STAR allocations sources utilized for this program?

Secretariat's Comments Yes

Agency's Comments

9.4 Indicative Focal Area Elements

For non-IP Programs

Does the table contain the sum of focal area elements and amounts as per the sum of the child projects?

Secretariat's Comments Yes

Agency's Comments

9.5 Indicative Co-financing

Are the indicative amounts, sources, and types of co-financing adequate and reflect the ambition of the program? Has the subset of co-finance which are expected to be investment mobilized been identified and defined (FI/GN/01)?

Secretariat's Comments

(Karrer, April 25, 2023). Addressed

Agency's Comments

Agency's Comments 5 May 2023

See above responses.

Annex B: Endorsements

9.6 Has the program and its respective child project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat's Comments

Yes

Agency's Comments

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

Secretariat's Comments Yes

Agency's Comments

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

Secretariat's Comments

(Karrer, May 17, 2023). Addressed.

(PPO, May 16, 2023). No

Please upload revised letters from Morocco (last version shows both BD and CC STAR Allocation while in Portal's entry only BD STAR funding are sourced for this child project) and from Nigeria (last version shows different break-down between financing and PPG from Portal's entry)

(Swain, April 25, 2023). As noted in the first comment section of this review, Letters of Endorsement are missing for India and Nigeria.

Agency's Comments

Agency's Comments 5 May 2023

India and Nigeria LoEs have been uploaded as well as a new LoE for Brazil. The updated LoE from Costa Rica, Morocco and Jordan are still being waited.

Agency's Comments 17 May 2023

Morocco and Nigeria's letters are uploaded.

Annex C: Program Locations

9.7 a) Are geo-referenced information and maps provided indicating where the program interventions will take place?

Secretariat's Comments Yes

Agency's Comments

Annex G: NGI Relevant Annexes* (*only for non IP programs)

9.9 a) Does the program 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.

b) Does the program provide a detailed reflow table to assess the program capacity of generating reflows? If not, please provide comments.

c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments NA

Agency's Comments

Additional Annexes

10 GEFSEC Decision

10.1 GEFSEC Recommendation

Is the program recommended for clearance?

Secretariat's Comments

(Karrer, May 17, 2023). Yes

(Karrer, April 25, 2023). No. Please address the comments.

Agency's Comments

10.2 Additional Comments to be considered by the Agency(ies) during the child project development.

Secretariat's Comments

Agency's Comments

10.3 Review Dates

	PIF Review	Agency Response
First Review	4/26/2023	
Additional Review (as necessary)	5/16/2023	
Additional Review (as necessary)	5/17/2023	
Additional Review (as necessary)		
Additional Review (as necessary)		