

Global Elimination Program for PCB (GEP-PCB)

Edit and Submit PIF

Basic project information

GEF ID

11749

Countries

Global (Nigeria, Madagascar, Uganda, Cameroon, Gabon, Eswatini) **Project Name**

Global Elimination Program for PCB (GEP-PCB) Agencies

World Bank, UNEP, UNDP, AfDB **Date received by PM**

9/20/2024 Review completed by PM

11/4/2024 Program Manager

Anil Sookdeo Focal Area

Chemicals and Waste Project Type

PFD

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

October 16, 2024 - The program summary mentions 8 countries, however only 6 countries are listed in the program information. Please separate the anticipated executing agencies by country and not have generic descriptions.

October 29, 2024 - comment cleared.

Agency's CommentsDone. The PFD now mentions only 6 countries and the executing agencies are clearly identified.

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

Secretariat's Comments

Agency's Comments 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

It is important to clearly indicate that inventories will only need to confirm amounts of PCB above the 50ppm threshold as the management of concentrations below this amount is not covered by the Convention and therefore outside of the scope of the program.

Please explicitly include deriving best practice and knowledge from the full PCB portfolio of the GEF as many projects have implemented non-combustion and combustion methods to treating PCBs.

October 29, 2024 - Comments cleared.

Agency's CommentsDone. 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

The program objective suggests scaling up of PCB disposal, however the amounts of PCB being proposed can be bettered classified by tail end disposal. Please reframe the objective to reflect the program's role in addressing remaining stockpiles that can be verified. The objective also mentions a standardized template approach which is not defined. Please define what this is and its role.

It is unclear what is meant by an integrated approach. Please define what this means in the context of the program.

The proposal mentions that local solutions will be encouraged. Please clarify what is envisioned here.

Please clarify what type of technical assistance and capacity building will be provided to client countries and clarify why this is not being done by the individual child projects.

As the MSP has not yet been approved, please remove references to it from the program.

Please align the components in the table with the description of the components in the narrative as they are currently not aligned.

On the description overview table: M&E costs are around 5.7% which is above the average 2% for projects above USD 10 million. Please clarify.

October 29, 2024 - On the description overview table: The co-financing contribution to PMC is not proportionate compared with the GEF contribution to PMC. If the GEF contribution is kept at 4.9%, for a co-financing of \$157,155,000 the expected contribution to PMC must be around \$7,660,677 instead of \$5,845,000 (which is 3.7%). As the costs associated with the project management must be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a similar level. Please ask the Agency to amend either by increasing the co-financing portion and/or by reducing the GEF portion.

Nov 1, 2024 - comment cleared

Agency's Comments

The objective has been modified and now refers to remaining PCB. The STA is now defined as addition of standardized components, tools etc. to T&D operations.

The integrated approach is now defined as integration of PCB elimination with T&D operations.

Local solutions refers to availability of local or national capacity to address PCB elimination. Text has been added.

Text has been added on TA and capacity building activities and the relationship between the Program's knowledge and TA platform and activities at the child project level has been clarified as a "franchise model" that facilitates cost-effective delivery of TA and training.

All reference to MSP is removed.

An explanation for higher M&E costs is now provided.

October 31, 2024

- The co-financing amounts have been adjusted. PMC-co-financing is now 5%

- The components are now aligned. But due to a glitch in the PFD, the table does not display the components in the right order.

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

Yes, however please provide narrative on the costs for PCB management and disposal and currently available and proven technologies that have been deployed through previous GEF project.

Please provide further information on key stakeholder groups and local actors and their expected roles to program outcomes, as well as further details on consultations during PFD development and plans to develop a Stakeholder Engagement Plan and carry out global and regional consultation and outreach activities.

October 29, 2024 - comments cleared

Agency's Comments

Text has been added reflecting on the PCB management and disposal technologies currently available and their cost. The project will consider the lessons learned on PCB management and disposal from previous PCB projects.

Additional text on stakeholder engagement and engagement plans added.

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

Under the Gender Mainstreaming section, please note that gender experts and representative of women's networks working on the intersection of gender perspectives and chemicals and wastes are important stakeholders and should be part of the group to be consulted (not just to share information to) in the GCP's activities (for example, in relation to the development of elimination plans, tools and approaches). On references to ?gender representation?, please make the following amendment to: women?s representation/women?s groups representation and/or representation of other gender identities (if the program sees relevant). On knowledge exchanges, please also ensure that learnings and best practices on integrating gender perspectives and engaging women are captured and widely disseminated. On Monitoring and Evaluation, please reflect that that gender-specific results will also be monitored and reported on regularly.

October 29, 2024 - comments cleared.

Agency's Comments

Clarification on inclusion of gender issues and participation of women added throughout as requested.

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

Yes, however please include narrative on how each child project will achieve the 2028 goals for PCB from the program.

October 29, 2024 - Comment cleared

Agency's CommentsText on how the Program and child projects contribute to achieving the 2028 target has been added.

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 CommentsYes

Agency's Comments

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.01GEF/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 adaptative management?

Secretariat's CommentsYes

Agency's Comments

5.5 Risks to Achieving Program Outcomes

a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?

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

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

Secretariat's Comments

Please describe the risk of not having PCB owners willing to participate in the project and the proposed mitigation measures.

We note that the overall ESS risk of the project is classified as high and the project attached Environmental and social Risk Rating. However, it is not clear what kind of action will be taken in the child project level.

Please provide a plan to conduct an environmental and social assessment and develop an environmental and social risk management plan for child project level.

October 29, 2024 - comments cleared

Agency's Comments

The risk that utilities and other PCB owners are unwilling to participate is now discussed and mitigation measures explained.

Actions to mitigate high ESF risks and plans for ESF assessment and development of an ESMF are now explained, following standard World Bank ESF procedures.

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 CommentsYes

Agency's Comments

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

Secretariat's Commentsyes

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 CommentsYes

Agency's Comments 7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat's CommentsYes

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

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

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

Child Gabon GEFID 11753:

i. Some figures in Child Project Financing Tables are different than those allocated in LOE. Additionally, the LOE figures does not add to the total reflected in the table. Please issue a new LOE with the correct figures and to amend by adjusting the figures in Portal to match those in the LOE. When resubmitted, we will recalculate the amounts to ascertain that the amounts in Portal are reflecting those in LOE and provide comments if appropriate.

Nov 4, 2024 - A revised LoE has been provided with the correct figures. Comment cleared.

Agency's Comments

UNDP has confirmed by email (uploaded) that PPG and agency fee amounts in PFD are correct and that a revised LOE will be issued.

Non-STAR Focal Area allocation?

Secretariat's Commentsyes

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

Agency's Comments IP Contribution

Secretariat's Comments

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

Agency's Comments

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 CommentsYes

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

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 CommentsYes

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 CommentsYes

Agency's Comments 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

Please upload missing LOE's. Please note that child projects without LOE's will need to be dropped from the program.

October 29, 2024 - All LoE's have been uploaded, however in all cases the footnotes have been removed and there are inconsistences between the titles of the projects in the portal and the LOEs. In all cases, please obtain an email from the respective OFP to correct this as well as align the project titles in the portal with the title in the LOE:

a. Child Nigeria GEFID 11750:

i. Title of child project differs between LOE and Portal?s child project entry, please either obtain revised LOE or correct child projects? title to match with LOE.

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

iii. The executing agency listed in the PFD is different than the one displayed in the child project information. Please ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE.

b. Child Madagascar GEFID 11751:

i. Title of child project differs between LOE and Portal?s child project entry, please either obtain revised LOE or correct child projects? title to match with LOE.

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

iii. The executing agency listed in the PFD is different than the one displayed in the child project information. Please ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE.

c. Child Uganda GEFID 11752:

i. Title of child project differs between LOE and Portal?s child project entry, please either obtain revised LOE or correct child projects? title to match with LOE.

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

iii. The executing agency listed in the PFD is different than the one displayed in the child project information. Please ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE.

d. Child Cameroon GEFID 11756:

i. Title of child project differs between LOE and Portal?s child project entry, please either obtain revised LOE or correct child projects? title to match with LOE.

ii. The template utilized for this project by the OFP removed the footnote that conditions the selection of the executing partner to the following: ?Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?. Per the email sent back in March when we were aiming to constitute June 2023 Work Program, Agencies were informed that LoEs ?with

modifications cannot be accepted and will be returned?. While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project. Please get an email from the OFPs accepting this footnote to be part of the LoE (this is an alternative to request a new LoE).

iii. The executing agency listed in the PFD is different than the one displayed in the child project information. Please ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE.

e. Child Gabon GEFID 11753:

i. Title of child project differs between LOE and Portal?s child project entry, please either obtain revised LOE or correct child projects? title to match with LOE.

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

iii. The executing agency listed in the PFD is different than the one displayed in the child project information. Please ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE.

f. Child Eswatini GEFID 11754:

i. Title of child project differs between LOE and Portal?s child project entry, please either obtain revised LOE or correct child projects? title to match with LOE.

ii. The template utilized for this project by the OFP removed the footnote that conditions the selection of the executing partner to the following: ?Subject to the capacity assessment carried out by the GEF Implementing Agency, as appropriate?. Per the email sent back in March when we were aiming to constitute June 2023 Work Program, Agencies were informed that LoEs ?with modifications cannot be accepted and will be returned?. While the removal of the footnote seems to be trivial, it is not: this footnote reduces the chances of having an executing partner that does not meet the fiduciary and procurement standards required to safely execute the project. Please

get an email from the OFPs accepting this footnote to be part of the LoE (this is an alternative to request a new LoE).

iii. The executing agency listed in the PFD is different than the one displayed in the child project information. Please ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE.

Nov 1, 2024 - the OFPs revised the LOEs or emailed acceptance of the footnotes, however, 1- On the project information:

a. Child Gabon GEFID 11753:

i. Ensure consistency between the PFD and its child project entries and enter the anticipated executing entities as identified in the LOE. Please change the name in Portal, both child and PFD, to match with the revised LOE, which should read: ?Ministry of Environment, Climate and Human-Wildlife Conflict? in English.

Agency's Comments The LOE for all six countries are now uploaded.

This has been corrected for all child projects:

- The LOE for Cameroon already had the footnote.

- Revised LOEs (with footnote) for Madagascar and Uganda have been uploaded.

- Revised LOE (with footnote) for Gabon uploaded, with UNDP email confirming LOE will be reissued with PPG and agency amounts that are correctly stated in PFD.

- Emails from Nigeria and Eswatini OFC advising that LOE with accepted footnote will be issued.

Note: Many OFPs were in Cali at the Biodiversity COP, on field trips and on the way home - they have not been able to communicate.

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

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

Agency's Comments 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 No, please provide.

October 29, 2024 - comment cleared

reflows? If not, please provide comments.

Agency's CommentsA map is now provided. Georeferencing data for location of transformers and PCB activities is not yet know.

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

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

Secretariat's Comments

Agency's Comments Additional Annexes 10 GEFSEC Decision

10.1 GEFSEC Recommendation

Is the program recommended for clearance?

Secretariat's Comments

This program cannot be reviewed as there are no associated Letters of Endorsement from the respective OFPs. The program is being returned to the agency.

October 22, 2024 - Please address the review.

October 29, 2024 - All comments have been addressed and the program is recommended for technical clearance.

Nov 4, 2024 - All LoE or email showing acceptance of the footnote have been provided and the PMC and figures for Gabon have been aligned throughout the PFD., however there is a mismatch with the name of the executing agency for Gabon. Please change in the child project and the PFD in the portal,

Agency's Comments

1. Four of six Letters of Endorsement have been uploaded. The LOEs for Nigeria and Madagascar will be received shortly and will then be uploaded as well.

2. Child project concepts have been revised, compiled and uploaded.

All six LOE are now uploaded.

Nov 4, 2024: Gabon: Name of ministry changed to "*Ministry of Environment, Climate and Human-Wildlife Conflict*" as per GEFSEC instruction.

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	10/22/2024	
Additional Review (as necessary)	10/29/2024	
Additional Review (as necessary)	10/30/2024	
Additional Review (as necessary)	11/1/2024	
Additional Review (as necessary)	11/4/2024	