



GEF GOLD+ in Nigeria: Enhancing the formalization and mercury-free gold in Nigeria

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10603

Countries

Nigeria

Project Name

GEF GOLD+ in Nigeria: Enhancing the formalization and mercury-free gold
in Nigeria

Agencies

UNIDO

Date received by PM

12/3/2021

Review completed by PM

10/5/2022

Program Manager

Anil Sookdeo

Focal Area

Chemicals and Waste

Project Type

FSP

PIF
CEO Endorsement

Part I ? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Project description summary

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

Secretariat Comment at CEO Endorsement Request Yes

Agency Response

3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Co-financing

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

Secretariat Comment at CEO Endorsement Request

Yes, however with the exception of the miners association there is no identified private sector co-financing. As access to formal supply chains is an essential component of this project please clarify.

July 11, 2022 - While the response indicates that discussions have been ongoing with the Bank of Industry, a letter of support is required.

October 5, 2022 - comment cleared

Agency Response

Agency Response 13 Apr 22

Please note that there are other private sector co-financiers apart from Nigeria Miners Association. Women in Mining (WiM) and Global Rights Ltd are two other financiers of the project, as indicated in the submitted CEO Endorsement package.

In addition, the specific sites in each of the targeted regions will be selected during project implementation and it is also expected to mobilize specific private sector co-financing, respectively from the pilot site owners once they are confirmed. For ensuring the co-financing from the pilot sites (direct investments in mercury free technology), the condition for private investments is listed as one of the sites selection criteria (see the specific section on site assessment of the project, respectively Annex K - Page 2 ? letter L)

We would like to emphasize on extensive discussions and several bilateral meetings held with Nigeria Bank of Industry in 2021 during CEO development which also continued the first quarter of 2022. BOI is already implementing a loan programme for investments in ASM mining sector with reduced interest rates, which is building up the investment capabilities of the miners. BOI is also a relevant stakeholder during the implementation of the financing component of the project. In spite of the efforts made an official co-financing letter specifically addressing this project was not received, but BOI expressed support for the project implementation during stakeholders' consultation meetings.

Agency Response 2 Sept 2022

UNIDO received co-financing from Bank of Industry Nigeria (BOI) committing 5 mio. USD co-financing for investment activities. In addition, private sector partner Yankari

Global Infrastructure Ltd. confirmed investment co-financing of 1 mio USD for the project.

The quoted amounts were reflected under section C - Confirmed Sources of co-financing of CEO and both letters were up-loaded in the GEF submission portal.

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request

Budget - Please clarify why the costs of workshops are higher than other costs. Please also provide an annotated budget on what is being considered under the different categories, for example, what are the types of equipment covered under the equipment line etc.

July 11, 2022 - The reasoning does not explain the costs. It is usually less costly to have workshops outside of the capitals in other countries so it is unclear why this would not be the case here. Also please note that the portal text does not have an annotated budget as indicated in the response.

October 5, 2022 - comment cleared however the project team is requested to monitor the costs and report at PIR, MTR and TE.

Agency Response

Agency Response 13 Apr 22

The costs of workshops are higher due to the decentralized organization of the country and the need to hold trainings in the national capital, but also in the federal States capitals. Also, the trainings related to the transfer of non-Mercury technologies it is very relevant for Nigeria at all stage of the projects to ensure sustainability after the lifespan of the project. Effectiveness of the project will greatly rely on knowledge transfer.

Related to equipment component of the budget under the output 1.3 addressing piloting mercury free technologies, the investment activities will be carried out with the co-financing participation of the sites, this justifying the limited contribution requested for equipment budget line.

An annotated budget is provided in the respective section of the CEO document.

Agency Response 2 Sept 22

The costs of workshops were revised and decreased to 25% of the total project grant (in similar manner with other approved child projects (e.g. Bolivia Gold+ child project workshops and meetings component accounts for 26% of total approved child project grant)

The revised annotated budget is re-loaded in the portal.

Agency response 3 Nov 2022

Comment noted. PIR, MTR and TE are responsibilities of UNIDO as Lead implementing agency.

Project Preparation Grant

6. Is the status and utilization of the PPG reported in Annex C in the document?

Secretariat Comment at CEO Endorsement Request Provided

Agency Response

Core indicators

7. Are there changes/adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?

Secretariat Comment at CEO Endorsement Request

There seems to be an error in the amount of tons in the core indicator table for core indicator 9. Please provide information on how the targets for the core indicators 4 and 6 were calculated and include this information under the core indicator table.

July 11, 2022 - Comment cleared on Core indicator 9, however please note that the fields are blank for core indicators 4 and 6.

October 5, 2022 - Comment cleared.

Agency Response

Agency Response 13 Apr 22

7a. Response to core indicator 9: Apologies, this was a typo in the portal, the figure was corrected in line with the project descriptive paragraphs (para 93 and para 175). Correct figure is 4.62 MTons.

Kindly also note the additional consideration of the replication factor bringing the revised total to 18,48 MTons. Additional paragraph was added for providing clarification on the replication factor.

Project text review:

The sum of mercury use reduction that will be achieved in the participating states during the 5-year program implementation phase amounts to 4.62 metric tons. The Nigeria National Action Plan recommended a Mercury phased reduction approach of 30% decrease in four years. Therefore, the project has also estimated a targeted 30% reduction from the aggregated amount of 15.4MT of Mercury for the four States, in line with the Nigeria National Action Plan document.

(*) Through the establishment of enabling framework conditions, the financial mechanism to be designed and the awareness and dissemination efforts, it is expected that the mercury reduction target will be replicated after the project is finalized. A replication factor of 3 is expected over the 10 years following completion of the project and representing an additional 13,86 tons of mercury reduction, reaching an overall project total amount of 18,48 tons.

7b. core indicator 4:

The calculation considered one site per State and with the project proposing four pilot sites. Area of Landscapes Under Improved Practices was estimated by obtaining geocodes of sites from the respective states for mining activities and processing plants (where available) and via application of Google Earth mapping tool(s). All estimated site areas were summed up. Calculations considered the average size of land versus the size of the total land areas of the actual ASGM sites. Most ASGM sites occupied averagely about 3 acres while the processing centers occupied averagely between one to two hectares. This results an average of 50 hectares for improved practices for each site, taking into consideration jurisdictional land approaches.

7c. core indicator 6:

Most of the gold mining operations currently use heavy machinery (estimated No. for machinery for 4 sites was 186) that is highly carbon emitting. Often running on heavy fuel oils (HFOs), diesel or gasoline for several hours per day (>10 hours) for mining, milling and concentration process. Technical improvements will be implemented in the metallurgical practices of gold recovery in all the 4 targeted pilot sites, deploying energy efficiency mechanisms to increase productivity. Consequently, it is expected that these processes will effectively reduce monthly fuel consumption in the 4 pilot mining sites and min. 8 mining operators will replicate the good practices by an average of 4,000 liters of hydrocarbons per month resulting in a reduction of greenhouse gas emissions by an estimated 1,998 metric tons of CO₂eq. / month, using the multiplication factor 0.00268 tonnes CO₂eq/liter of heavy fuel

Over the entire project lifetime (5 years), an average of 119,880 metric tons of CO₂eq will be prevented in addition to the other environmental co-benefits of the project.

The GEF Revised Manual for calculating GHG Benefits of GEF Energy and GEF Transport Project has been used (<https://www.thegef.org/publications/manual-calculating-ghg-benefits-gef-transportation-projects>)

Agency Response 2 Sept 22

Portal fields figures for the core indicators were re-checked / re-saved in the portal

Part II ? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request

Please provide more specific information based on factual evidence on the environmental problems that have been identified in the project. The narrative provided is non-specific and cites no evidence to back up the assertions made.

In the description of the international laws/treaties relevant to the project, please indicate in the text if the national legislation of Nigeria takes on the provisions of treaties such as the Minamata Convention.

Paragraph 70 is unclear. What is the lack of access to finance subsequent to?

Paragraph 77 is unclear in what is spent less, is it time or resources? For paragraph 77, what is the basis of the conclusions presented, how were these findings and recommendations arrived at?

In paragraph 78, what document or policy is being referenced for the phase out deadlines. Please provide.

July 11, 2022 - Comments Cleared.

Agency Response

1a. Comments addressed, kindly refer to the revision of para 17 as follows:

?17. Artisanal and small-scale gold mining (ASGM) has long been practiced in Nigeria and around the world. Bolstered by alternative livelihoods, and a ready ? if expensive ? supply of mercury, there has been a resurgence of ASGM activities. This resurgence, however, has come at a price like the devastating lead poisoning of children and others from lead-contaminated soil. Significant emissions and releases of mercury into the air and soil. In 2010, unregulated artisanal and small-scale gold mining led to an epidemic of Lead and Mercury poisoning which led to the death of at least 163 people between March and June, including Zamfara State incidence, there was a repeat of the exposure in Niger State which also claimed the lives of about 30 children. The intervention of partners like UNIDO quickly intervened and avoided a volume of numbers like that of Zamfara. Despite the efforts of both nationally and globally, Lead and Mercury contamination continues to afflict large numbers of the populace, especially at mining sites has also resulted in widespread contamination of miners and others working near the mines. It is even worse with Mercury at home, thereby exposing their entire family members and other members of their society to Mercury poisoning during amalgamation thereby causing emissions of mercury into the air and washing the pans containing mercury by the

Para 40 on legislation has been revised as follows:

40. Nigeria ratified the Minamata Convention on Mercury. The ratification instruments were deposited February 1, 2014. The provisions of the Minamata Convention on Mercury, its text being published into Official Journal of Nigeria (FGP 84), prohibit mercury pollution across many sectors, including ASGM, by prohibiting trade of certain mercury-added products and by requiring reduction of mercury emissions. Under the provisions of this convention the Nigeria government, through FMEnv, NESREA, MMSD and others listed below, ensures the provision of support towards the protection of human health and the environment from mercury compounds in the ASGM sector.

The national policies and regulations addressing mercury and hazardous chemicals management in general are as follows:

? The National Policy on Chemicals Management, Federal Republic of Nigeria, 2010

The policy was developed to integrate the management (production, handling and disposal) of chemicals for the protection of human health and the environment. It was also aimed at developing relevant legal and legislative instruments required to strengthen the strategies and mechanisms for collection and retrieval. The policy seeks to identify and prioritize national needs in all sectors for sound management of chemicals, resources development, technical assistance requirements, and financial resources mobilization. This policy will enhance the safety in the gold mining industry and in the national planning processes of chemicals management in Nigeria

●National Environmental (Air Quality Control) Regulations, S.I. No 64, 2014

The purpose of these regulations is to provide for improved control of the nation?s air quality to such an extent that will protect human health and other resources affected by air quality deteriorations.

●National Environmental (Hazardous Chemicals and Pesticides) Regulations, S.I. No 65, 2014

These regulations seek to protect human health and the environment from harmful effects of hazardous chemicals. It also contributes to the sustainable development of agriculture and the conservation of the environment.

●National Environmental (Surface and Groundwater Quality Control) Regulations, S.I No. 22, 2011

This regulation aims to restore, enhance and preserve the physical, chemical and biological integrity of the nation?s surface and groundwater resources.

●National Environmental (Sanitation and Waste Control) Regulations, S.I. No, 28, 2009

This regulation is to provide legal framework for the adoption of sustainable and environment friendly practices in order to minimize pollution.

●National Environment Protection (Pollution abatement in industries and facilities producing waste) Regulations, S.I. No. 29, 2009

This regulation ensures restriction are imposed on the release of toxic substances and requirement of stipulated monitoring and control measures; exceedances; unusual and accidental discharges; contingency plans; generators liabilities; strategies of waste reduction and control.

●The Harmful Waste (Special Criminal Provisions Etc.) Decree 1988, Decree No. 42.

This decree prohibits the carrying, depositing and dumping of harmful waste on any land, territorial waters, contiguous zone, inland water ways and prescribes severe penalties for any person found guilty of any Crime relating thereto. The following

- Section 6 provides for punishment of life imprisonment for offenders as well as the forfeiture of land or anything attached thereto.

- Section 7 makes provision for the punishment accordingly, of any conniving, consenting or negligent officer who contravenes the provisions of this decree.

2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

Paragraph 145 appears to suggest that miners already using cyanidation may be supported to improve their practices. Please note that only miners using mercury are eligible to receive GEF financing and other miners can only receive indirect support through knowledge exchange, training etc at costs outside of the GEF resources.

July 11, 2022 - the response is noted however to reiterate, sites that are not using mercury will be ineligible for GEF support under the Minamata Convention and as such if work on non-mercury sites are done, they can only be done through co-financing. Please confirm.

October 5, 2022 - comment cleared.

Agency Response

The Secretariat comment is well noted. Furthermore, it has been revised to read: In several locations (Kebbi, Niger, and Kaduna states) miners are already using cyanidation in a non-environmentally friendly manner, in addition to mercury. There is an urgent need for adequate technical assistance to train these miners how to operate and make use of cyanides in an environmentally friendly manner for gold processing. However, majority of miners do use mercury

Agency Response 2 Sept 2022

We confirm that sites not using mercury are ineligible and not considered under current project. The para 145 is revised to read:

?In several locations (Kebbi, Niger, and Kaduna states) miners tested cyanidation but practices are non-environmentally friendly and the current practices rely on mercury. There is an urgent need for adequate technical assistance to train these miners how to operate and make use of cyanides in an environmentally friendly manner for gold processing?

4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

Please include how the core indicator targets for core indicators 4 and 6 were calculated.

July 11, 2022 - Comment cleared, however please note that the fields are blank in the relevant section in the core indicator table.

October 5, 2022 - Addressed.

Agency Response

Core Indicator 4:

Total Land Area ? Area of Landscapes Unimproved = Area of Landscapes Under Improved Practices (inclusive

The calculation was done for each mining state and the total was recorded. Estimates of **Total Land Areas** were provided

Area of Landscapes Under Improved Practices was estimated by obtaining geocodes of sites from the respective states (where available); and calculating the area they cover via application of Google Earth mapping tool(s). All estimated site areas were included in the **Area of Landscapes Under Improved Practices**. Where geocodes were not available or inadequate, states were able to provide estimates of areas where mining activities are carried out.

Core Indicator 6:

Most of the gold mining operations currently use heavy machinery (estimated No. of pieces of machinery for 4 sites was 186) that consume fuel oils (HFOs), diesel or gasoline for several hours per day (>10 hours) for mining, milling and concentration processes. The implementation of metallurgical practices of gold recovery in all the 4 targeted pilot sites, deploying energy efficiency mechanisms to improve these processes will effectively reduce monthly fuel consumption in the 4 pilot mining sites and min. 8 mining operators will save 4,000 liters of hydrocarbons per month resulting in a reduction of greenhouse gas emissions by an estimated 1,998 metric tonnes CO₂eq. The factor is 0.00268 tonnes CO₂eq/liter of heavy fuel

Over the entire project lifetime (5 years), an average of 119,880 metric tons of CO₂eq will be prevented in addition to the savings from the pilot sites.

The GEF Revised Manual for calculating GHG Benefits of GEF Energy and GEF Transport Project has been used (<http://www.gef.org/ghg-benefits-gef-transportation-projects>)

Agency Response 2 Sept 2022

Portal fields figures for core indicators were re-checked / re-saved in the GEF on-line portal

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Child Project

If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?

Secretariat Comment at CEO Endorsement Request

Yes, however please elaborate on the program level results that the child project is expected to contribute to.

July 11, 2022 - It is not clear what changes have been made to the project text to reflect the changes.

October 5, 2022 - Comment cleared.

Agency Response

The contribution of the child project to the program level results has been reviewed. In addition, please refer to the specific Theory of Change, developed in synergy with the global programme (the paragraphs 87 ? 90)

Agency Response 2 Sept 2022

Related paragraphs were added (high-lighted) in the portal, additional paragraphs are quoted below:

The Nigeria child project fully responds to and reflects the GOLD+ Programme's ToC, by designing interventions that promote responsible mining technologies and practices. The child project outputs directly contribute to the PFD, expanding on the global programme. It explores the various options for financial mechanisms to provide financial products suited to the ASGM sector, following territorial boundaries of mining areas with a commodity focus on responsible gold.

The Project aims at promoting mercury reduction in ASGM through holistic multi-sectoral integrated formalization in the gold production and supply chain, to enable an optimally functioning ASGM sector with the appropriate capacity to

The project outputs are structured to target one or more root causes of mercury use and negative impacts on the human health

The Child Project and its components are designed to remove barriers to access to finance and adoption of mercury-free technologies, knowledge and lessons learned at the national and global level on mercury use reduction. To sustain the expected success, achievements will be replicated after the lifespan of the project.

The project will support the institutionalization of coexistence between leaching plants and ASGM, pilot commodity supply chain, Government capacity to promote formalization processes.

It will support micro-financing schemes and improved business skills to enhance uptake of mercury-free equipment as well as diligence mechanisms.

Finally, the project will establish assay labs or processing plants as well as a training center to promote resource efficient institutions to strengthen support for mercury reduction in mining organizations.

The child project will contribute to the results of the program as a whole, particularly to the global environmental benefits of the global project on knowledge management. Information will be provided upward to the program and downward for systems. This will allow for lessons and knowledge generated to be available and utilized by subsequent work in ASGM

If the outputs are completed successfully, then the project will reduce mercury use in ASGM and the negative impacts of mercury use. It will promote formalization in the ASGM sector through jurisdictional approaches, increasing investment through access to finance and mercury-free technologies and improving knowledge and skills of local actors. The child project will drive formalization in the environment and human protection.

Stakeholders

Does the project include detailed report on stakeholders engaged during the design phase?

Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Gender Equality and Women's Empowerment

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

Secretariat Comment at CEO Endorsement Request

The analysis has been provided and a description of how gender is linked to the project components have been provided.

Agency Response

Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

Secretariat Comment at CEO Endorsement Request

The description of engagement with the private sector does not clearly define which private entities would be engaged, nor what form the engagement would be.

July 11, 2022 - Section 4 of the project document is unchanged and no elaboration to respond to the comment has been included.

October 5, 2022 - Comment cleared.

Agency Response

The private sector stakeholders to be involved and their roles are detailed under the section Stakeholders Engagement Plan of the project document (which specifically included the private sector main relevant actors in Nigeria) - Paragraphs 194 - 202 (4. Private Sector Engagement section) and its Table 8 detailing type of engagement.

List of private sector players mentioned are.

1. Consulting firms that are into the following service on gold mining;
? Research

- ? Training
 - ? Awareness campaign and education
 - ? Advocacy
2. Fabricators and suppliers of equipment
 3. Private financial sector actors, and
 4. Private plant owners

Agency Response 2 Sept 2022

Paragraphs 214 ? 217 of Section 4 specifically addressing private stakeholders engagement were revised. The revised text is quoted below:

- "214. The project creates opportunities for involving private sector consulting firms for their services on gold mining in the areas of research, training, awareness, and advocacy.

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- 214bis. Specific to the Component 2 and access to finance, stakeholders from the financial sector will be involved. The Bank of Industry contribution through its specific programme providing access to finance for ASGM sector will play a major role and will provide a model for other potential financing stakeholders. The project will build on the advocacy processes to raise interest and awareness on the importance of financing responsible ASGM for profit, sustainability, and corporate social responsibility purposes. The awareness on the ASGM sector is expected to generate promotion of financial incentives and the progressive engagement of the financial stakeholders with the ASGM operators will enhance the opportunities of cooperation among operators and financing institutions.

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- 215 The involvement of private sector fabricators and suppliers of equipment will provide proper technologies along with capacity-building sessions for ASGM cooperatives on the operation and maintenance of the equipment. There are linkages with equipment and machinery providers. The project will actively approach these actors to generate awareness on cleaner and more efficient technologies or how to use equipment and machinery for a more responsible mining sector. Win-win schemes where equipment suppliers provide proper technologies along with capacity building sessions on operation and maintenance in exchange for procurement and usage on the miners' side promoting environmentally responsible management plans in their operations will be explored.

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- 216. In terms of responsible supply chains, the involvement of the private sector will be linked with intermediary companies that deal with gold commercialization in the country as well as international buyers and users that could potentially be interested in buying responsible gold. International refiners, jewelers and electronics companies will be informed on the ASGM sector in Nigeria and relevant data related to the project progress and milestones will be shared through the Programme Advisory Group (PAG) meetings . Information on gold sourcing due diligence programs implemented by these actors will also be shared with the gold mining with the gold mining cooperatives to raise awareness on the importance of responsible ASGM

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- 217. Privately owned leaching plants will be involved as drivers for adoption of mercury-free technological changes thereby ensuring best practices and local capacity

are in place. These plants could potentially be involved as possible drivers of technological changes ensuring responsible practices and local capacity are in place. This can be an essential vector for mercury reduction."

- Kindly also note revised Stakeholders Engagement Plan (Annex W) for better reflecting private sector engagement key responsibilities, along with its correlated Paragraphs 194-202 of CEO document.

The Table 8 of stakeholders engagement section was also completed with additional information on private sector stakeholders accordingly, to better reflect private sector engagement.

S/N o	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
1.	Ministry of Mines and Steel Development (MMSD)	Strengthened organizational capacity in the formalization of ASGM, coordination of access to finance mechanisms with relevant financial institutions and enhanced technical capacity to ensure reduction of mercury use in ASGM.	<p>Demonstrate leadership in the formalization of ASGM.</p> <p>Enter into contract with the Bank of Industry (BOI) to accelerate mechanisms that promote access to finance for miners.</p> <p>Collaborate with the FMEnv in the application of the JA/SLA at the identified sites.</p> <p>Collaborate with the BCCC-Africa in developing training/capacity building program for the implementation of the child project.</p>	Components 1,2,3,4, and 5					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
2.	Federal Ministry of Environment (FMEnv)	Improved inter-ministerial collaborative capacities and technical proficiencies in the identification, appraisal and institutionalization of mercury-free technologies including land use approaches in the context of the JA/SLA.	<p>Ensure compliance of child project implementation activities to the following; i) National guidelines for EIA Act 86 of 1992: Sectoral Guidelines for Mining (2013) and ii) National Policy on the Environment, (2016).</p> <p>Provide oversight functions to NESREA in the enforcement and regulation of environmental standards as concerns implementation of the child project in Nigeria.</p> <p>Conduct environmental due diligence and environmental and social audits at selected ASGM sites/locations.</p>	Components 1,2,3,4, and 5					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
3.	Basel Convention Coordinating Center (BCCC) for Africa.	Improved knowledge base to coordinate and promote training, capacity building and knowledge transfer related to mercury reduction in ASGM.	<p>Conduct trainings and capacity building on application on mercury-free technologies and laboratory assays.</p> <p>Provision of technical assistance in relevant subject areas during project implementation.</p>	Components 1,3,4, and 5					
4.	National Environmental Standards Regulations Enforcement Agency (NESREA)	Strengthened capacity to enforce environmental standards and sectoral guidelines for mining operations, specifically ASGM.	<p>Enforcement of environmental standards and regulations as applicable to project implementation activities</p> <p>Support to sustainability of adopted technologies and process</p>	Components 1,3,4, and 5					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
5.	Miners' Association of Nigeria	Establishment of collaborative platforms to enable synergy with the MMSD in achieving formalization of ASGM and institutionalization of ASGM cooperatives.	<p>Extending communication of the MMSD to smaller miner groups especially ASGM operators.</p> <p>Assist the MMSD in the formalization of ASGM operators and organization of the latter into cooperatives.</p> <p>Work with the Federal Mines Officers in the monitoring of ASGM activities across project participating states.</p> <p>Assist the MMSD in the quantification, valuation and estimation of mercury-free gold yield from ASGM activities.</p> <p>Assist the MMSD and security agencies/stakeholders in the surveillance and profiling of unregistered, informal and prohibited ASGM operators/value chains.</p> <p>Mobilization and sensitization of artisanal and small-scale gold miners during field work and stakeholder's trainings and workshops.</p>	Components 1, 3 and 5					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
6.	Women in Mining	<p>Enhanced administrative, technical, financial and project management capacity for NGO involvement in ASGM.</p> <p>Driving channels which encourage gender differentiated participation in ASGM, particularly female participation in the entire ASGM value chain.</p> <p>Improving sectoral guidelines, obligations and responsibilities to reducing Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)/ Gender Based Violence (GBV) in ASGM in-country.</p>	<p>Promotion of women participation in mining through dissemination of Information, Education, Communication (IEC) materials.</p> <p>Sensitization and awareness on SEA/SH/GBV at identified sites in participating states.</p> <p>Assist in statistical assessment as regards Gender differentiated participation in ASGM under the GEF Gold+ Nigeria Child Project.</p>	Components 1, 3 and 4.					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
7.	Global Rights Nigeria.	Allowance for free and fair global NGO participation, monitoring and review of activities associated with the implementation of the Child Project in Nigeria. Therefore, enabling global best practices and assurance of the observation of human rights, governance in mining and social justice.	<p>Collaborate with executing agencies (MMSD, FMEnv, BCCC-Africa), in building platforms for participatory governance in ASGM</p> <p>Working with executing agencies during project implementation on a wide range of cross-cutting issues including: Women's Rights, Access to Finance for ASGM operators, Natural Resource Governance as it applies to JA/SLA, etc.</p> <p>Protecting Community Rights during project implementation in relation to the Institutional, Legal and Regulatory Framework for Mining Activities in Nigeria.</p> <p>Monitoring key indicators associated with the socioeconomic impacts of the implementation of the GEF Gold+ Child Project in Nigeria.</p>	Components 1,2,3,4 and 5					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
8.	Kian Smith Trade & Co Gold Refinery	Provision of opportunities/platforms for participatory local content consultancy services and private sector participation in the ASGM value chain.	Participate in the formalization of miners Support the pilot of supply chain management under the project	Components 1, 2, and 3					
9.	Nigerian Institute of Mining and Geosciences (NIMG), Jos	Training and capacity building of Lab Technicians, Geo-scientists who will handle day to day operations of rehabilitated/renovated laboratories identified by the GEF project to enable Ex-situ analysis of mercury-free Gold samples obtained from ASGM activities in the selected sites.	Support training and capacity building to be undertaken by BCCC-Africa. Provision of laboratory services for mercury-free gold obtained from formalized ASGM groups under the Child Project.	Component 4.					
10.	National Metallurgical Development Centre (NMDC), Jos		Provision of laboratory services for mercury-free gold obtained from formalized ASGM groups under the Child Project.	Component 4.					
11.	Nigerian Geological Survey Agency (NGSA) Laboratory, Kaduna.		Provision of laboratory services for mercury-free gold obtained from formalized ASGM groups under the Child Project.	Component 4.					

S/No	Critical Stakeholder	GEF Project Institutional Strengthening Contributions	Key Responsibilities	Applicability to Component	Timeline				
					Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
12.	State Governments (Niger, Kaduna, Zamfara, Kebbi).	<p>Strengthened institutional capacity at the state government levels to apply JA/SLA at identified sites.</p> <p>Technical assistance in the installation of mercury-free technologies, equipment and materials required for processing plants operation.</p> <p>Sensitization and awareness to enable state government design suitable and project specific OHS approaches that support labour and working conditions, as well as community health and safety in ASGM.</p>	<p>Application of JA/SLA.</p> <p>Demonstrate leadership in monitoring of ASGM activities at the state levels and uptake of mercury-free technologies.</p> <p>Assure community health and safety during project implementation.</p> <p>Work synergistically with the MMSD, FMEnv, and Miners Association of Nigeria (MAN).</p>	Components 1, 2, 3, and 5.					
13.	Bank of Industry	Participation in enabling financial mechanism for ASGM sector investments	Provision of financing mechanism for ASGM private sector participation	Component 2					
14.	Yankari Global Infrastructure Ltd.	Investment support assistance in the installation of mercury-free technologies, equipment and materials required for processing plants operation.	Provision of technical assistance and investments in relevant sites for commissioning of mercury-free technologies	Component 3					

Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request

Yes, including risks posed by climate change and Covid 19

Agency Response

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Consistency with National Priorities

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Knowledge Management

Is the proposed ?Knowledge Management Approach? for the project adequately elaborated with a timeline and a set of deliverables?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Benefits

Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Project Results Framework

Secretariat Comment at CEO Endorsement Request Provided

Agency Response

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request

October 18, 2022 - Please see comments from PPO:

Child Project to be returned to the Agency due to:

1. Co-financing: NESREA 5M grant: change to ?In-kind / Recurrent expenditures? (as per the co-financing letter)

2. Core Indicators:

- Neither the M&E Plan, nor the Results Framework, available in the ProDoc describe the means of verification, sources, frequency of updates and methodology. Please add these elements.

- The results framework (Annex A) is missing the core indicators and the targets. This is mandatory at CEO endorsement.

3. Expected Implementation Start date has already past - please adjust to a further date:

4. On the PMC Proportionality: there is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5.0%, for a co-financing of \$28,890,000 the expected contribution to PMC must be around \$1,44,500 instead of \$480,000, which is 2.0%. As the costs associated with the project management have to be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a similar level. Please amend either by increasing the co-financing portion and/or by reducing the GEF portion.

5. PPG report doesn't include sufficient details on expenditure categories for PPG activities ? please provide details per the eligible categories included in Portal:

6. Budget table:

- Financial expert should be charged under PMC:

- The budget table under Annex E and the Portal entry's table B do show some differences between components as following:

Component 1 in Budget table: \$1,052,485 - Component 1 in Table B: \$1,050,000

Component 2 in Budget table: \$1,103,359 - Component 2 in Table B: \$1,100,000

Component 3 in Budget table: \$950,000 - Component 3 in Table B: \$956,667

Component 4 in Budget table: \$469,999 - Component 4 in Table B: \$470,000

7. Gender:

1) Please review and revise the percentage of beneficiaries by sex. The project notes:

"It is assumed that all family members of a household with a miner will benefit from the project, either directly or indirectly. The disaggregated percentage beneficiaries are estimated at 13% women and 87% men." The project document also notes that "women are estimated to represent 30 ? 50% of the global ASM workforce. 40 ? 50% of the ASM workforce in Africa are women."

With the figures presented, and if it is assumed that all family members of a household with a miner will benefit from the project, it is safe to assume that the share of women and men as beneficiaries can mirror the figure of women-men representation in Cote d'Ivoire (most likely 50-50).

2) In Component 2.1. ASGM organizations procured equipment through micro-financing institutions and improved business skills for men and women, section IV. Capacity building for financial Institutions:

Para 131. The project will look to: pilot not less than 15 credit/loan applications (target not less than 15% applications from women or women cooperatives)

Please review and revise this proportion of women to be targeted. 15% would amount to 1 or 2 applications only from women. Please increase the percentage to at least 30%.

3) Para 148. The identified cooperatives members will be trained in mercury-free technology as the implementation of these new technologies requires quite some trained personnel. In total 1000 cooperatives, members will be trained (900 men and 100 women) on the new mercury-free technology.

Please review and revise the number of women to be trained as the current 10% would be considered low if we are aiming for women's empowerment and gender equality. Minimum would be 30% unless there is further justification for the percentage to be lower.

4) Please provide a Yes/No response to below questions in Section 3. Gender Equality and Women's Empowerment (see arrows). These are sub-items of the question "Does the project expect to include any gender-responsive measures?" As the response to this question is Yes, the Agency should have at least one Yes to the three sub-items that follow.

Nov 30 - Comments cleared.

Agency Response

Agency response 3 Nov

1. Co-financing: NESREA co-financing description was corrected in Table C.
2. Core Indicators: The section monitoring and evaluation has been revised in line with the PPO comments. We apologies for the missing section in the portal. Apparently, it was caused by an uploading error. The Annex A has been re-uploaded within the CEO, also attached again as a separate word document
3. Expected Implementation: Project timeline has been updated.
4. PMC Proportionality: Co-financing section was revised for proportionality ratio, by adjusting the co-financing contribution towards project components allocated funding proportionality.
5. PPG report: Detailed PPG report was uploaded under the specific section.
6. Budget table:
 - Comment on Financial expert should be charged under PMC: The financial specialist included in the project team will not undertake the functions envisaged for the financial management of the project. The financial specialist will be in charge of implementing

component 2 which seek to propose innovating models to increase access to finance for artisanal and small-scale miners and provide education to both financial institutions, investors and lenders as well as mining organizations and individuals. For that reason, the expert is charged to its specific component instead of PMC. Project accountability is executing entity in-kind contribution.

- Portal entry Table B is correct version. The error in detailed budget break-down spread-sheet was addressed and corrected

7. Gender: The gender section was revised in line with the comments. Text is highlighted in the portal for easy reference. Also, the related indicators reflected in the project results framework were adjusted.

•Gender topics addressed:

•- assumption of the share of women and men as beneficiaries 50 - 50 % has been undertaken for direct beneficiaries

- Component 2.1: Para 131: percentage increased to 30%; Para 148.the number of women to be trained min. 30%

- Section 3 typo correction (at least one Yes to the three sub-items that follow)

Council comments

Secretariat Comment at CEO Endorsement Request Comments from the US council member has been addressed.

Agency Response

<p><u>US Comment on Nigeria child project</u></p> <ul style="list-style-type: none"> • Within the Nigeria child project, the executing agency is also the Basel Convention Coordination Center for Africa Region. While they are at least based in Nigeria, we have similar concerns as above about their suitability for these issues, including if they have the contacts or substantive understanding of the ASGM sector to effectively manage the projects. We understand the EU is supporting an effort across Africa to build capacity in the small-scale mining sectors, especially of the geological survey agencies. This may be a more effective way to make progress on mercury in ASGM. 	<p>Review of the project execution agreement responds to the United States of America comment at PIF. The proposed institutional and execution arrangement involving national executing partners are explained in the CEO Endorsement Document.</p>	<p>CEO Endorsement document</p>
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STAP comments

Secretariat Comment at CEO Endorsement Request

Please provide commentary on how the STAP comments were responded to in the specific components of this project.

October 5, 2022 - comments cleared

Agency Response

Agency Response 2 Sept 2022

The GOLD+ Nigeria project did not receive other specific comments at concept phase, however the project has taken into account the comments received by the GOLD+ global programme, which are detailed in the table below:

Comments from the STAP		
Comments	Response from GOLD+ Nigeria	Reference in documents
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> This project will involve the convening multi-stakeholders with the associated challenges (see World Bank, 2014, page 5-7 for examples of these challenges – https://www.wiltonpark.org.uk/wp-content/uploads/WP1314-Report1.pdf). For example, the proposed landscape/jurisdiction approach will involve engaging different actors, such as governments, communities, the private sector, and civil societies. STAP wishes to refer the project proponent to its latest publication on "multi-stakeholder dialogue for transformational change" (https://stagef.org/publications), which presents principles of multi-stakeholder dialogue (MSD), analyses the context of MSD, and highlights the process of designing an effective MSD. 	Refer to Stakeholder Engagement Plan of the GOLD+ Nigeria project.	Annex I – Stakeholder Engagement Plan
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> The project will adopt the jurisdictional approach (JA) as a framework for structuring interventions. The second paragraph on page 28, however, highlights some of the challenges associated with the JA, including unrealistic expectations, political turnover, limited public sector capacity, and lack of broader support and incentives. Yet, the PIF is silent on how the project will overcome these challenges to ensure success. STAP recommends that this <u>should be done</u>. 	Refer to assessment of jurisdictional approach for the GOLD+ Nigeria project and output 1.2 of the logical framework.	CEO Endorsement document
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> Component 4 will support capacity building, knowledge sharing, and communication, including "using online education and digital marketing tools to support the traditional participatory workshop and training model to help institutionalize sustainable mining methods at the community level." It is, however, unclear how online education and digital marketing tools <u>will be used</u> given the remoteness of ASGM operations (as noted in the last paragraph of page 19). Does this project intend to provide digital access to ASGM miners? The details of how this component <u>will be achieved</u> need to be elaborated. 	Incorporated under component 4 of the GOLD+ Nigeria project.	CEO Endorsement document
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> As rightly <u>noted</u> in the risk section of the PIF, the introduction of new technologies or ensuring mercury-free gold mining may inadvertently result in loss of livelihood. In such cases, alternative livelihood strategies may be required to achieve the project objectives. This is particularly important because mercury-based ASGM may be more profitable than other alternative sources of livelihoods in the targeted communities. Hence, a well-considered strategy <u>may be needed</u> to wean miners from their current practices. The proposal, however, seems not to put enough emphasis on interventions for addressing this issue. 	Incorporated under component 3 of the GOLD+ Nigeria project.	CEO Endorsement document
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> It is good that the PIF acknowledged that the project would contribute to other GEF core indicators, including the area of land restored, area of landscapes under improved practices, and <u>greenhouse gas emission reduction</u>. The PIF <u>did not, however, present</u> clearly how the interventions will lead to these benefits. We encourage that the project proponent elaborates further on this and provide a detailed estimation of all expected GEBs at the PPG stage (as promised in the PIF). 	Refer to GEB core indicators of the GOLD+ Nigeria projects for co-benefits.	CEO Endorsement document
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> For a project that will depend on significant multi-stakeholder engagement for its success, the stakeholder section of the PIF is inadequate. Please provide a detailed analysis of stakeholders <u>expected to be engaged</u> in the project in the participating countries. Please, also highlight how they will be engaged, their expected role in the project, and whether they have been engaged already or if this is ongoing. 	Refer to Stakeholder Engagement Plan of the GOLD+ Nigeria project.	CEO Endorsement document – Stakeholders Engagement section
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> It is good that the PIF acknowledges the potential impacts of projected climate change, for example, desertification on achieving project objectives. The effects of climate change may also influence decisions on ASGM sites? We recommend that a detailed analysis of climate risk and management strategy <u>should be presented</u> for the project. 	Refer to climate change-related risks included in the Environmental and Social Management Plan (ESMP) for the GOLD+ Nigeria project.	Annex I – Environmental and Social Management Plan

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<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> This project will involve the convening multi-stakeholders with the associated challenges (see World Bank, 2014, page 5-7 for examples of these challenges – https://www.wiltonpark.org.uk/wp-content/uploads/WP1314-Report1.pdf). For example, the proposed landscape/jurisdiction approach will involve engaging different actors, such as governments, communities, the private sector, and civil societies. STAP wishes to refer the project proponent to its latest publication on "multi-stakeholder dialogue for transformational change" (https://stagef.org/publications), which presents principles of multi-stakeholder dialogue (MSD), analyses the context of MSD, and highlights the process of designing an effective MSD. 	Refer to Stakeholder Engagement Plan of the GOLD+ Nigeria project.	Annex I – Stakeholder Engagement Plan
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<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> As rightly <u>noted</u> in the risk section of the PIF, the introduction of new technologies or ensuring mercury-free gold mining may inadvertently result in loss of livelihood. In such cases, alternative livelihood strategies may be required to achieve the project objectives. This is particularly important because mercury-based ASGM may be more profitable than other alternative sources of livelihoods in the targeted communities. Hence, a well-considered strategy <u>may be needed</u> to wean miners from their current practices. The proposal, however, seems not to put enough emphasis on interventions for addressing this issue. 	Incorporated under component 3 of the GOLD+ Nigeria project.	CEO Endorsement document
<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> It is good that the PIF acknowledged that the project would contribute to other GEF core indicators, including the area of land restored, area of landscapes under improved practices, and <u>greenhouse gas emission reduction</u>. The PIF <u>did not, however, present</u> clearly how the interventions will lead to these benefits. We encourage that the project proponent elaborates further on this and provide a detailed estimation of all expected GEBs at the PPG stage (as promised in the PIF). 	Refer to GEB core indicators of the GOLD+ Nigeria projects for co-benefits.	CEO Endorsement document
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<p><u>STAP Comment</u></p> <ul style="list-style-type: none"> It is good that the PIF acknowledges the potential impacts of projected climate change, for example, desertification on achieving project objectives. The effects of climate change may also influence decisions on ASGM sites? We recommend that a detailed analysis of climate risk and management strategy <u>should be presented</u> for the project. 	Refer to climate change-related risks included in the Environmental and Social Management Plan (ESMP) for the GOLD+ Nigeria project.	Annex I – Environmental and Social Management Plan

Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request

Please provide a commentary of how the Minamata Convention Secretariat comments were addressed in this child project.

July 11, 2022 - Please include explanatory comments in the relevant section of the portal.

Oct 5, 2021 - comment addressed.

Agency Response

Agency Response 2 Sept 2022

The GOLD+ Nigeria project did not receive other specific comments at concept phase, however the project has taken into account the comments received by the GOLD+ global programme, which are detailed in the table below:

<u>Comments from the Minamata Secretariat</u>		
<u>Comment</u>	<u>Response from GOLD+ Nigeria</u>	
<p><u>Minamata Secretariat Comment</u></p> <ul style="list-style-type: none"> While this project clearly advances implementation of the <u>Minamata</u> Convention, the program description provides limited attention to the Convention requirements, and we are concerned that the various governmental and non-governmental partners going forward will therefore not gain sufficient understanding and advancement of their Convention obligations. We would like to ensure that the child projects clearly focus on Article 7 and Annex C <u>requirements and finalization</u> and implementation of NAPs. 	Coordination between the implementation of adopted NAP Nigeria and the GOLD+ Nigeria project <u>is expected</u> as Nigeria Child project was designed based on the NAP Nigeria findings.	CEO Endorsement document
<p><u>Minamata Secretariat Comment</u></p> <ul style="list-style-type: none"> Gender - Is the gender distribution noted here a widely used metric when very specific community-based data is not available? Or is it simply a placeholder? We note that gender impacts <u>will be more thoroughly evaluated</u> in the child projects. It would also be useful to ensure good estimates of populations "directly" involved (working in ASGM) as well as <u>impacted</u> by ASGM. 	Refer to the Gender Analysis and Action Plan of the GOLD+ Nigeria project.	Annex H – Gender Analysis and Action Plan
<p><u>Minamata Secretariat Comment</u></p> <ul style="list-style-type: none"> Component 1: all the participating countries will already be party to the Convention so not clear what the phrase about ratification refers to – we assume implementation of their MC obligations. Regional cooperation was referred to earlier in challenges description and should be a more prominent part of the project, <u>eg</u>, enhancing ECOWAS or UEMOA actions. 	Regional cooperation with other countries in the Africa regions <u>will be explored</u> .	CEO Endorsement document
<p><u>Minamata Secretariat Comment</u></p> <ul style="list-style-type: none"> Component 2: The activities on collaborating with local financial institutions should also involve linkages with the formalization efforts, such that formalization schemes and financial products are mutually reinforcing. 	Interlinkages between formalization and mercury-free technologies and access to finance <u>have been considered</u> in the GOLD+ Nigeria. Refer to component 2.	CEO Endorsement document
<p><u>Minamata Secretariat Comment</u></p> <ul style="list-style-type: none"> Component 3: In section on enhancing uptake of mercury-free technologies, we note that cyanide <u>is appropriately listed</u> as one of the technologies in the chart. However, no mention is made of the Convention's requirement that ASGM National Action Plans elaborate actions to eliminate "cyanide leaching in sediment, ore or tailings to which mercury has been added without first removing the mercury." This requirement <u>should be prominently featured</u> such that any support for cyanide operations focuses on this critical need. 	These actions <u>have been considered</u> under component 3 of the GOLD+ Nigeria project.	CEO Endorsement document

Other Agencies comments

Secretariat Comment at CEO Endorsement Request

Agency Response

CSOs comments

Secretariat Comment at CEO Endorsement Request

Agency Response

Status of PPG utilization

Secretariat Comment at CEO Endorsement Request PPG utilization has been accounted for.

Agency Response

Project maps and coordinates

Secretariat Comment at CEO Endorsement Request Provided

Agency Response

Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)

Secretariat Comment at CEO Endorsement Request

Agency Response

Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request

Agency Response

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

Secretariat Comment at CEO Endorsement Request

Please provide a response to review comments and revise the CER as appropriate. Please note that some of the inserted images are not displaying clearly so please re-upload them.

July 11, 2022 - Comments remain to be addressed and revisions to the project document needs to be done.

October 5, 2022 - Technical screen completed and all comments addressed. The project is being sent for PPO screen.

October 18, 2022 - Please see comments from PPO

November 30, 2022 - Comments cleared.

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	1/4/2022	
Additional Review (as necessary)	7/11/2022	
Additional Review (as necessary)	10/18/2022	
Additional Review (as necessary)	11/30/2022	
Additional Review (as necessary)		

CEO Recommendation

Brief reasoning for CEO Recommendations