

Eliminating POPs through Sound Management of Chemicals

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

9562

Countries

Maldives

Project Name

Eliminating POPs through Sound Management of Chemicals

Agenices

UNDP

Date received by PM

11/7/2018

Review completed by PM

7/11/2019

Program Manager

Anil Sookdeo

Focal Area

Chemicals and Waste

Project Type

FSP

PIF

CEO Endorsement

Project Design and Financing

1. If there are any changes from that presented in the PIF, have justifications been provided?

Secretariat Comment at CEO Endorsement

No

Response to Secretariat comments

2. Is the project structure/ design appropriate to achieve the expected outcomes and outputs?

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

3. Is the financing adequate and does the project demonstrate a cost-effective approach to meet the project objective?

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

4. Does the project take into account potential major risks, including the consequences of climate change, and describes sufficient risk response measures? (e.g., measures to enhance climate resilience)

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

5. Is co-financing confirmed and evidence provided?

Secretariat Comment at CEO Endorsement

The co-financing letters do not seem to have been uploaded into the portal. Please upload the co-financing letters.

April 24, 2019 - Co-financing letters provided in a language other than English needs to be accompanied by an English translation. Please provide a translation of the letter written in [Maldives](#).

May 20, 2019 - The co-financing letter has been provided - comment cleared.

Response to Secretariat comments April 30, 2019 - Translation of the co-financing letter has been added in Annexes.

6. Are relevant tracking tools completed?

Secretariat Comment at CEO Endorsement

Core indicator 10 needs to be filled in as this project is proposing to eliminate 15gTEQ/a of emissions.

April 23, 2019 - on looking at the GEB assumptions this project is planning to deal with 24 tons of contaminated equipment and oil which needs to be split into the weight of the pure PCB which should be in sub-indicator 9.1 and the weight of the contaminated equipment in 9.6. Please correct these figures.

Comment on core indicator 10 is cleared.

April 24, 2019 - The core indicators have been partially corrected. The actual weight of the PCB contained in the contaminated equipment needs to be reflected in 9.1.

May 14, 2019 - There is a calculation error for calculating the weight of PCB. The calculation is off by a factor of 1000. When liters is multiplied by specific gravity the result is kilograms and not tons. Please correct.

May 20, 2019 - The calculations have been corrected - comment cleared

Response to Secretariat comments

Core indicator 10 has been filled in as requested.

With respect to core indicator 11, the men/women ratio is based on the fact that there is 47.6% female labour force participation (ie: 47.6% of the total female population works); while the corresponding figure for males is 79.7%. Using this ratio, it was applied to the total beneficiaries, to arrive at a beneficiary target of 34,270 females and 57,230 males.

May 16, 2019 - The Core Indicator Page in the Portal has now been adjusted to reflect an 8.97 mT tonnage at indicator 9.1. Furthermore, the text box on the same page is as follows:

“Provide additional explanation on targets, other methodologies used, and other focal area specifics (i.e., Aichi targets in BD) including justification where core indicator targets are not provided”

According to the Maldives NIP the highest ranking national priorities are the following:

a) First Priority: The Implementation of measures to strengthen the institutional and regulatory framework, which includes the:

- (i) developing legislation for chemicals management;
- (ii) strengthening institutional capacity;
- (iii) improving data collection and management systems and
- (iv) conducting research on the effects of POPs;

b) Second Priority: Developing an action plan to eliminate PCB-containing equipment and its waste by 2025, which includes the

- (i) identification, labeling and mapping where PCBs and equipment potentially-containing PCBs are located in the country);
- (ii) putting in place labelling mechanism for all PCB-containing equipment;
- (iii) establishing adequate storage facilities for replaced equipment-containing PCBs;
- (iv) formulating guidelines for disposal of equipment-containing PCBs; and
- (v) disposing safely of equipment containing PCBs.

c) Reducing the incineration and open burning of wastes (including medical and hazardous waste), which is the source of 98.6% of U-POPs releases in the country-totalling 153.4 g-TEQ/year;

d) Raising awareness through the development of education curricula and targeted awareness campaigns;

e) Establishing a standard Chemical Management System, including chemical labeling in multiple languages.

Further, key findings of a PCB Inventory update done in the PPG found that 5 of the most populated islands hold 15 Electrical Transformers and 3 Oil Filled Circuit Breakers which potentially contain PCBs, containing a total of 6,100 litres of Potential PCB containing oil, in approximately ~ 24 tonnes of electrical equipment, owned by FENAKA Corporation (14 transformers) and STELCO (1 transformer and 3 circuit breakers). In converting the 6100 litres of PCB to metric tonnes, it was assumed the specific gravity of the Askarel PCB oil has a specific gravity that falls in the range of 1.38 to 1.56, which would average about 1.47 (Source:

<https://testguy.net/content/204-Specific-Gravity-of-Transformer-Oil-Where-to-Draw-Your-Sample>). Therefore $6100 \text{ L} * 1.47 = 8,967\text{kg} = 8.967 \text{ mT}$ PCB oil is to be eliminated.

The targets and indicators therefore seek to address enhanced POPs management systems and measurable reductions in PCBs and uPOPs. The project therefore seeks to dispose of the 24 metric tons of PCB-containing oil, equipment and waste identified in the inventory (more information is outlined in the project baseline information provided in following sections), the elimination of 8.97 tonnes of PCB oil, and the prevention of at least 15 g-TEQ PCDD/F through the BAT/BEP pilots (which is equivalent to about 10% of the total u-POPs releases in the NIP).

7. Only for Non-Grant Instrument: Has a reflow calendar been presented?

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

8. Is the project coordinated with other related initiatives and national/regional plans in the country or in the region?

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

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

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

10. Does the project have descriptions of a knowledge management plan?

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

Agency Responses

11. Has the Agency adequately responded to comments at the PIF stage from:

GEFSEC

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

STAP

Secretariat Comment at CEO Endorsement Yes

Response to Secretariat comments

GEF Council

Secretariat Comment at CEO Endorsement N/A

Response to Secretariat comments

Convention Secretariat

Secretariat Comment at CEO Endorsement N/A

Response to Secretariat comments

Recommendation

12. Is CEO endorsement recommended?

Secretariat Comment at CEO Endorsement

All information related to the project description must be in the portal. The official document that is being reviewed is the portal text and not uploaded project documents. In this regard referring to uploaded project documents is insufficient. In this regard, please revise the project text in the portal and resubmit for a review.

Additionally please fill all appropriate core indicators.

The description provided in the portal still refers to annexes and as such the project is considered incomplete. Please provide all information relevant to each section of the CEO endorsement in the CEO endorsement template. All reviews are only based on the CEO template and not agency products etc.

April 23, 2019 - The Core indicators requires correction and the co-financing letters are missing.

April 24, 2019 - The core indicators still require corrections and a translation into English of one of the co-financing letters is required.

May 14, 2019 - There is a calculation error for core indicator 9.

May 20, 2019 - Please address the following errors in the template - Executing Agency - need to change the type of agency from GEF Agency to Government. Please include the taxonomy and Rio Markers. Also include submission date and expected date of completion.

May 28, 2019 - Please address the following errors: Co-finance document from UNDP indicates a co-finance amount of \$50,000. Table C in GEF Portal is indicating an amount of 65,000, which is higher by \$15,000 – Agency needs to amend. - Co-finance document from WAMCO indicates a co-finance amount of \$218,871.60 for 2018, from 2019 to 2022 average per year \$247,730.22 with an increase of 5% annually, the total co-financing indicating in the document would be approximately \$1,286,619.81. Table C in GEF Portal is indicating an amount of \$1,587,737. Which is higher by \$301,118 – Agency needs to amend. - Co-financing document from government indicates a co-finance amount of nearly 80.3 million represented in projects that have all already started - It is extremely unlikely that the whole amount represented is actual co-financing considering that some projects have been under execution for three years or so. Please ask the Agency to provide a realistic co-financing amount commensurate to the available amounts and the actual contribution to the project's objectives, as per the definition of co-financing.

August 5, 2019 - From the documentation provided it appears that UNDP will perform some executing functions for the project. From UNDP's project document and in the attached Annex J to the project document below are some examples: UNDP Direct Project Services as requested by Government: The UNDP, as GEF Agency for this project, will provide project management cycle services for the project as defined by the GEF Council. In addition, the Government of Maldives may request UNDP direct services for specific purposes, according to its policies and convenience. The UNDP and Government of Maldives acknowledge and agree that those services are not mandatory and will be provided only upon Government request. If requested, the services would follow the UNDP policies on the recovery of direct costs. These services (and their costs) are specified in the Letter of Agreement (Annex J). As is determined by the GEF Council requirements, these service costs will be assigned as Project Management Cost and duly identified in the project budget as Direct Project Costs. Eligible Direct Project Costs should not be charged as a flat percentage. They should be calculated on the basis of estimated actual or transaction-based costs and should be charged to the direct project costs account codes: "64397- Services to projects – CO staff" and "74596 - Services to projects GOE for CO". Project Board: The Project Board (also called Project Steering Committee) is responsible for making by consensus, management decisions when guidance is required by the Project Manager, including recommendations for UNDP/Implementing Partner approval of project plans and revisions, and addressing any project level grievances. In order to ensure UNDP's ultimate accountability, Project Board decisions should be made in accordance with standards that shall ensure management for development results, best value money, fairness, integrity, transparency and effective international competition. In case a consensus cannot be reached within the Board, final decision shall rest with the UNDP Programme Manager. Senior Supplier: The Senior Supplier is an individual or group representing the interests of the parties concerned which provide funding and/or technical expertise to the project (designing, developing, facilitating, procuring, implementing). The Senior Supplier's primary function within the Board is to provide guidance regarding the technical feasibility of the project. The Senior Supplier role must have the authority to commit or acquire supplier resources required. If necessary, more than one person may be required for this role. Typically, the implementing partner, UNDP and/or donor(s) would be represented under this role. The Senior Supplier is: UNDP. In accordance with the Guidelines on the Project and Program Cycle Policy, the procedures for a GEF Implementing agency to perform executing functions require that the documentation presented at CEO Endorsement must include an explicit request signed by the GEF OFP(s) of the participant country(ies) indicating the specific roles and responsibilities of all partners, including any execution activities provided by a GEF Agency. The request should provide a sound justification for

the execution activities that the GEF Agency may perform. Please note that the procedure presented above is to be applied in exceptional cases where the situation merits the Implementing Agency to perform some executing functions. If this is the case, once the full documentation is presented, the we will further to assess the justification and internally consult on if these arrangements can be approved or not.

October 10, 2019 - The information presented in response to the question on the execution role of the implementation agency in this project provides sufficient justification on an exceptional basis to proceed to CEO endorsement. Please note that this approval, based on the limited amount of resources being executed does not form a precedence for future approvals and the implementing agency is to be reminded of the GEF policy on Implementing and Executing arrangements as outlined in the GEF project and program cycle policy and associated guidelines in future submissions. Comment Cleared - Project is recommended for CEO endorsement.

Response to Secretariat comments

May 16, 2019 - Comment on calculation error addressed.

May 24, 2019 – The **Executing Agency type** was already set as “Government” in “Part I: Project Information”. Kindly clarify in which section this information is erroneous.

Part I: Project Information

Name of Parent Program

GEF ID
9562

Project Type
FSP

Type of Trust Fund
GET

Project Title
Eliminating POPs through Sound Management of Chemicals

Countries
Maldives,

Agency(ies)
UNDP,

Other Executing Partner(s):

Ministry of Environment and Energy

Executing Partner Type

Government

GEF Focal Area
Chemicals and Waste

Duration
60
In Months

Taxonomy and Rio Markers have been updated.

Submission and completion dates – kindly clarify where we can update this information, as in “Part I: Project Information” the project duration was set with 60 months, and we cannot see where we can set “Submission date” and “Completion date”.

July 4, 2019: all comments have been addressed.

- Co-finance in table C has been amended to \$50,000;
- Co-finance from WAMCO – the total amount has been revised and the breakdown is available below. The total amount is \$1,209,403.75;

| WAMCO (Waste Management Corporation Limited) | | | |
|--|---------------|---------------------|-------------|
| | Year | Amount US\$ | 5% increase |
| Y1 | 2018 | 218,871.60 | 10,943.58 |
| Y2 | 2019 | 229,815.18 | 11,490.76 |
| Y3 | 2020 | 241,305.94 | 12,065.30 |
| Y4 | 2021 | 253,371.24 | 12,668.56 |
| Y5 | 2022 | 266,039.80 | |
| | Total | 1,209,403.75 | |
| | Average Y2-Y5 | 247,633.04 | |

- The Ministry of Environment has submitted a revised co-financing letter with total amount of \$57,877,272.96.

2nd October 2019 – UNDP does not execute activities in GEF projects. Instead, and upon government request, UNDP would provide support services to the government in the areas of procurement or recruitment on behalf of the National Implementation Partner, etc to accelerate delivery of the project to meet milestone deadlines. On this occasion, and to reflect the Government of Maldives’ request for support services, the GEF Operational Focal Point has provided a signed letter confirming its request of such services from UNDP, with break down of costs. This is uploaded in the portal for further review and consideration.

Review Dates

Secretariat Comment at CEO Endorsement

Response to Secretariat comments

| | | |
|---|--|--|
| First Review | | |
| Additional Review (as necessary) | | |
| Additional Review (as necessary) | | |
| Additional Review (as necessary) | | |
| Additional Review (as necessary) | | |

CEO Recommendation

Brief Reasoning for CEO Recommendations

This project is the first project to implement the National Implementation Plan of the Maldives. The COP of the Stockholm Convention has provided guidance to the COP that it should afford priority to Parties that have not yet received funding to implement their NIP.

The project seeks to reduce the risks of POPs on human health and the environment through strengthening institutional capacity and the policy and regulatory framework for the sound management and disposal of chemicals, POPs and POPS containing waste, specifically PCBs and prevention of UPOPs from the unsound management of hazardous and municipal waste. The project will also develop sustainable systems for the sound collection, labeling, storage, and disposal of hazardous chemicals and waste. The project will leverage a World Bank loan that is developing a municipal waste management sector and will work with utility operators in the Maldives who are currently upgrading the power generation capacity of the country.

The project will seek to dispose of approximately 8 MT's of PCB contained in 24 MT of PCB containing equipment and reduce emissions of 15gTEQ of UPOPs from the unsound management of waste.

On an exceptional basis the executing arrangements are being approved with a role for the implementing agency based on the the request of the OFP in writing and the limited resources that will be executed by the implementing agency.