



Eliminating hazardous chemicals from textile fashion supply chains in India

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

11178

Countries

India

Project Name

Eliminating hazardous chemicals from textile fashion supply chains in India

Agencies

UNIDO

Date received by PM

6/27/2024

Review completed by PM

Program Manager

Anil Sookdeo

Focal Area

Multi Focal Area

Project Type

CEO

Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

Please change the region to Asia.

Agency Response

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

Secretariat comment at CEO Endorsement Request

Yes

Agency Response

2. Project Summary.

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

b) Does the summary capture the essence of the project and is it within the max. of 250 words?

c) [If a child project under a program] Does the project summary include adequate and substantive link with the parent program goal and approach?

Secretariat comment at CEO Endorsement Request
The project summary successfully provides a concise and informative overview of the project, highlighting its problem, objective, strategies, and expected outcomes. It also establishes a clear link with the parent program's goals, demonstrating its contribution to the broader initiative.

Agency Response

3. Project Description Overview

a) Is the project objective statement concise, clear and measurable?

b) [If a child project under a program] Is there a project Theory of Change that is aligned and consistent with the overall program goal and approach?

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

d) Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?

- e) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**
f) Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

The Project Description Overview effectively presents the project's structure, objectives, and strategies. It demonstrates alignment with the parent program's goals and incorporates essential elements like gender, knowledge management, and M&E. The project's components, outcomes, and outputs are well-defined and contribute to achieving the project's objectives and core indicators. The justification for the slightly higher PMC percentage seems acceptable, given the project's specific context and requirements.

The PMC for this project is 7.31%, which is above the recommended limit of 5% for Full-Sized Projects (FSPs). However, the document provides a justification for this deviation, citing the longer duration of the project (six years) and the need to hire additional project staff. The justification seems reasonable, considering the project's complexity and the extended timeframe for implementation.

Agency Response

4. Project Outline

A. Project 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 project design?**
- b) Have 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 project outcomes? Is the private sector seen mainly as a stakeholder or as financier?**
- c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?**

Secretariat comment at CEO Endorsement Request
The Project Rationale effectively describes the current situation from a systems perspective and outlines how the project design addresses the identified challenges. It also recognizes the roles of various stakeholders, including the private sector, in contributing to the project's success. The private sector's involvement as both a stakeholder and a financier highlight its crucial role in driving sustainable change in the textile industry.

Agency Response

5 B. Project Description

5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?

b) [If a child project under a program] Is the Theory of change aligned with and consistent with the overall program goal and approach?

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region? [If a child project under a program] Does the description include how the alternative aligns with and contributes to the overall program goal and approach?

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

e) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

f) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?

g) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?

h) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?

i) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?

j) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?

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

l) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

m) Transformation and/or innovation: Is the project going to be transformative or innovative? [If a child project under an integrated program] Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

The document provides a brief overview of the socioeconomic benefits resulting from the project at both national and local levels. It mentions the potential for job creation, improved livelihoods, and enhanced environmental and health conditions for workers and communities. However, a more detailed and quantitative assessment of the socioeconomic benefits could further strengthen this aspect of the project description.

? The project is well formulated and build on detailed analysis of the sector and impacts on human and environmental health. The background detail of chemicals use is a valuable resource. Care should be taken to translate the quite complex project design involving a multitude of actors and several states into a realistic and transparent workplan during the inception phase.

? Chemical use is estimated at 0.58 kg chemicals/kg of textiles⁸ McArthur Foundation ? this seems very high. Please go back to the original source and double check this figure.

? In the baseline description. It may also be useful to separate salts use in dyeing, bleach use, from hazardous chemicals. Data there suggest about a ratio of 1:3 of ?chemicals? to fabric by weight, but combining all types of chemicals irrelevant to their relative toxicity provides not the full picture.

? Gender: Please be more differentiated in describing gender inequalities and impacts on the opportunities for women in the sector. Gender discrepancies in the textile sector both in industrial and artisanal settings are very large. Some of the key issues in the industrial sector are described (hazardous working conditions, unequal pay and education, etc.) but even in traditional artisanal settings women are often only in sub-par positions and most advanced weaving only taught to males with only a slow change happening and training women equally in the art. Another aspect not discussed is the opportunity for women to obtain credits and independently start businesses.

? Gender consideration in the project description: Gender consideration and providing opportunities for women headed sustainable businesses, advancing capacity building and training opportunities and access to finance etc. should be more clearly addressed across components, including targets to advance opportunities for women. The activities in output 1.1.3 and 3.1.4. are well placed but should be integrated across project outputs and activities.

? Component 3: Is there any cost-sharing target for the textile houses to be selected for e.g. innovative dyeing equipment or are these entirely grant financed/subsidized?

? The project description of activities is detailed but also very complex. A tight and transparent work plan with clear responsibilities needs to developed in the inception phase to have the project deliver this multitude of activities and provide ongoing support to stakeholders via an intermediary extension service.

? Component 4: there are currently four outputs to influence behavior and lead to unnecessary consumption. What about unnecessary production? Has it been considered to work with the frou fashion houses to e.g. have pilots of ?made to order? fashion products such as starting with pretty predictable products such as school and other uniforms ?

Agency Response

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

- a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**
- b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**
- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**
- d) [If a child project under an integrated program] Does the framework for coordination and collaboration demonstrate consistency with overall ambition of the program for transformative change?**

Secretariat comment at CEO Endorsement Request

The institutional arrangements and coordination mechanisms outlined in the document are well-structured and demonstrate a clear understanding of the project's requirements. The roles and responsibilities of different entities are clearly defined, and the rationale for their involvement is provided.

The document mentions that UNIDO will execute Component 6 (Knowledge Management and Learning) at the request of the Ministry of Textiles. The justification provided is that UNIDO, as the implementing agency, possesses the necessary expertise and experience to effectively manage this component. Please clarify why this cannot be executed by the Government counterparts.

Agency Response

5.3 Core indicators

- a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)? [If a child project under a program] Is the choice of core indicators consistent with those prioritized under the parent program?**
- b) Are the project'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?**

Secretariat comment at CEO Endorsement Request

The core indicators selected for the India Child Project are appropriate and aligned with the parent program's priorities. The project's targeted contributions to GEBs appear reasonable and achievable based on the project design and baseline data. The project's focus on reducing

hazardous chemicals, mitigating greenhouse gas emissions, and promoting sustainable land management practices demonstrates a strong potential for positive environmental impact.

239. Greenhouse gas emissions mitigated (metric ton of CO₂e): The project uses a baseline assessment to quantify current GHG emissions and hazardous chemical usage in the apparel supply chain. By implementing sustainable practices and cleaner production techniques in 400 textile factories, direct emission reductions are calculated. Indirect reductions are estimated through the ripple effect due to awareness, sensitization, training and capacity building, as well as through market transformation and policy influence. The approach includes benchmarking against industry baseline, making interventions of conservative energy efficiency in boilers, energy using equipment in the textile MSME units, renewable energy (solar electricity, solar heat) to reduce GHG emissions. The interventions designed aim for mitigating 147,000 tCO₂ directly and 294,000 tCO₂ indirectly over six years.

Analysis

We recommend addressing the following comments related to core indicator 6:

There is no explanation for the calculation of the core indicators in the Portal form. Meanwhile, the explanation in the agency's project document provides a general description of the considerations for core indicator 6. Still, it doesn't explain how direct and indirect GHG mitigation potential was calculated. Please elaborate on your explanation of the calculation of core indicator 6 and ensure you include it in the portal form.

Considering that the project aims to implement sustainable practices in 400 textile factories. If applicable, we encourage you to fill in core indicators 6.3 and 6.4 and explain how they were calculated.

Agency Response

5.4 Risks

- 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, impacts and management measures adequately assessed and rated and consistent with requirements set out in SD/PL/03?**

Secretariat comment at CEO Endorsement Request

The risk assessment in the document is comprehensive and well-structured. It identifies and assesses key risks across various categories and proposes realistic mitigation measures. The risk ratings provided seem to reflect the residual risk after considering the proposed mitigation measures. The environmental and social risks are also adequately assessed and managed through the ESMP. However, there might be a few areas where the risk assessment could be further strengthened. For instance, the risk of technological challenges, particularly the adoption of new technologies by MSMEs, could be explored in more detail. The document mentions providing technical support and training, but additional measures, such as financial incentives or pilot projects, could be considered to encourage technology adoption.

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

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

6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?

b) [If a child project under an integrated program] Is the project adequately aligned with the program objective in the GEF-8 programming directions?

Secretariat comment at CEO Endorsement RequestThe India Child Project demonstrates a strong alignment with both the GEF-8 programming strategies and the specific objectives of the Chemicals and Waste and Climate Change focal areas. The project's focus on eliminating hazardous chemicals from the apparel fashion supply chain and promoting sustainable practices directly contributes to the overarching goals of the parent program and the GEF-8 strategy.

Agency Response

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

Secretariat comment at CEO Endorsement RequestYes

Agency Response

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

Secretariat comment at CEO Endorsement Request

The project does not explicitly identify the specific targets of the Kunming-Montreal Global Biodiversity Framework that the project aims to contribute to. However, based on the project description and its expected outcomes, it can be inferred that the project may contribute to the following targets:

Target 2: Bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while ensuring their restoration and sustainable use. The project's focus on promoting sustainable land management practices and reducing pesticide use in cotton farming could contribute to the conservation and restoration of ecosystems and reduce the loss of areas of high biodiversity importance.

Target 3: Ensure that at least 30 per cent of terrestrial, inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories and practices, as applicable, by 2030. The project's potential impact on reducing pesticide use and promoting sustainable land management practices could indirectly contribute to the effective conservation and management of terrestrial areas, particularly those important for biodiversity.

Target 7: Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, including by reducing excess nutrients lost to the environment by at least half, pesticides by at least two thirds, and eliminating the discharge of plastic waste by 2030, and by reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through sound management of chemicals and waste and preventing, reducing, and working towards eliminating pollution from excess nutrients, biocides, plastic waste, and other sources. The project's focus on eliminating hazardous chemicals from the textile supply chain and promoting cleaner production practices directly contributes to reducing pollution risks and the negative impact of pollution on biodiversity and ecosystem functions. The project's efforts to reduce pesticide use in cotton farming also align with this target.

Target 10: Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through integrated pest management, agroecological and other innovative approaches contributing to

the resilience and long-term efficiency and productivity of these production systems, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services, by 2030. The project's focus on promoting sustainable practices in the textile industry, including the use of sustainable materials and cleaner production techniques, aligns with this target. The project's potential impact on reducing pesticide use in cotton farming also contributes to the sustainable management of agricultural areas.

While the project does not explicitly mention these targets, the project's expected outcomes and interventions clearly demonstrate its potential to contribute to the Kunming-Montreal Global Biodiversity Framework's objectives. A more explicit identification of the relevant targets and a clearer articulation of how the project's activities will contribute to achieving them could further strengthen the project's alignment with the framework.

Agency Response

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

8 Annexes

Annex A: Financing Tables

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

STAR allocation?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Focal Area allocation?

Secretariat comment at CEO Endorsement Request

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request

Agency Response

8.2 Project Preparation Grant (PPG)

a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

8.3 Source of Funds

Does the sources of funds table match with the amounts in the OFP's LOE?

Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement RequestYes

Agency Response

8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement RequestPlease upload missing co-finance letters.

Agency Response

Annex B: Endorsements

8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:

Has the 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 comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

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

Secretariat comment at CEO Endorsement Request

Agency Response

Annex C: Project Results Framework

8.6 a) Have the GEF core indicators been included?

b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the

Template?

e)[If a regional/global coordination child project under an integrated program] Does the results framework reflect the program-wide result framework, inclusive of results from child projects and specific to the regional/global coordination child project? [If a country child project under an integrated program] Is the child project result framework inclusive of program-wide metrics monitored across child project by the Regional/Global Child project?

Secretariat comment at CEO Endorsement RequestThe Project Results Framework is well-designed and incorporates key elements to effectively track progress and evaluate the project's outcomes. The inclusion of GEF core indicators, SMART indicators, and sex-disaggregated data demonstrates a commitment to measuring the project's environmental and social impacts. The framework also provides clear means of verification and sets targets that appear achievable based on the project's scope and financing. The alignment with the parent program's results framework further strengthens the project's contribution to the overall program goals.

Agency Response

Annex E: Project map and coordinates

8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex F: Environmental and Social Safeguards Documentation and Rating

8.8 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex G: GEF Budget template

8.9 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex H: NGI Relevant Annexes

8.10 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

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

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

Secretariat comment at CEO Endorsement Request

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

9.2 Additional Comments to be considered by the Agency during the inception and implementation phase

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	9/5/2024	
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		