Advancing Minamata Convention compliance through integrated governance, new infrastructure, and targeted engagement (IGNITE)

Review CEO Approval and Make a recommendation

Basic project information

GEF ID
12288
Countries
Georgia
Project Name
Advancing Minamata Convention compliance through integrated governance, new infrastructure, and targeted engagement (IGNITE)
Agencies
UNIDO
Date received by PM
2/27/2026
Review completed by PM

Program Manager
Itsuki Kuroda
Focal Area
Chemicals and Waste
Project Type
MSP

CEO Approval Request

Part I - General Project Information

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

Secretariat comment at CEO Endorsement RequestYes

Agency ResponseN.A.

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

Secretariat comment at CEO Endorsement RequestYes

Agency ResponseN.A.

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

Secretariat comment at CEO Endorsement Request
5/18 PM confirmed with thanks

Yes

1. Page 34 states the GEF ID# of the relevant projects but the rest of the pages do not. Please include them across the document for the easier reference.

2. The summary states "This gap leads to uncontrolled import, use, and disposal of these products, hindering Georgia?s ability to comply with the Convention." Please note that the convention does not prohibit "use" but rather manufacturing and not only "import" but also "export". Please modify across the document, as appropriate.

Agency Response
1.The GEF previously funded project IDs have been added across the document.

2. The sentence has been revised as follows: ?This gap leads to uncontrolled import, export, and disposal of these products, hindering Georgia?s ability to comply with the Convention?, where ?use? has been removed, and ?export? has been added. We refrained from adding the ?manufacturing? as there is no reported manufacturing activity of mercury in Georgia.

3. Project Description Overview
a) Is the project objective presented as a concise statement and clear?
b) 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?
c) Are gender dimensions, knowledge management, and M&E included within the project components and appropriately funded?
d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?
e) Is the PMC equal to or below 10%? If above 10%, is the justification acceptable?

Secretariat comment at CEO Endorsement Request
5/18 PM confirmed with thanks

The Budget table is not shown fully. Kindly modify the format and show it properly.

	[2301] Field survey for the nationwide assessment of mercury-containing waste generation and disposal practices (questionnaire administration, and primary data collection at hospitals, laboratories, kindergartens, schools, universities, and selected industrial sites)		$150,000.00										$150,000.00			$150,000.00	RECC
	[2302] Compilation of a structured dataset of customs records on mercury-added product imports for the past 10 years		$20,000.00										$20,000.00			$20,000.00	RECC
	[2303] Translation services	$8,000.00		$13,000.00	$12,000.00								$33,000.00			$33,000.00	RECC
	[2304] Graphic design, layout, printing, and distribution of the national technical guidelines for ESM of mercury-containing waste, the institutional management modality, and the SOP for public-reported mercury spills			$30,000.00	$30,000.00								$60,000.00			$60,000.00	RECC
	[2305] Subcontract with the private sector company for procurement, delivery, installation, pre-commissioning verification of mercury waste treatment equipment, and delivering operator training under the pilot intervention					$270,000.00							$270,000.00			$270,000.00	RECC
ntrac ual vice s	[2306] Subcontract with the selected private sector partner to execute the institutional waste collection drives — secure packaging, on-site safety supervision, lifting, and transport to the central temporary storage						$80,000.00						$80,000.00			$80,000.00	RECC
	[2307] Subcontract																

1. Outcome 1.1 states "National legal and regulatory framework for Minamata Convention implementation adopted". I assume this project aims at assisting to develop them but not adopt them. Kindly modify as appropriate.

2. Although gender dimension is included, it simply states is there are many women working for the medical and education sectors. Women in medical sector is assumed to be aware of the risk therefore how to further minimize exposure to mercury is rather unclear. Please elaborate or clarify.

3. Please ensure that knowledge products also capture lessons learned and best practices in advancing gender equality, women?s empowerment and gender mainstreaming in and through the project, and that these are widely disseminated.

4. Under M&E, please ensure that gender-specific results, and the implementation of the Gender Action Plan are monitored and are reported on (included in PIR, MTR, TE).

5. "A national capacity for mercury waste treatment established through pilot initiative and technology transferred to a private sector partner." although the plan is well elaborated, if the operation is funded via the national budget based on the National Action Plan or not is unclear therefore if the operation is sustainable beyond the project period is unclear. If private sector is expected to solely make the business/operation profitable, it may not be sustainable. Please modify as appropriate.

6. Please note that the M&E budget is 5.5% of project financing less M&E ($150,000 / $2,700,000); the recommended threshold for projects up to $5 million is 5%. Please revise or provide sufficient justification for higher M&E for your approval if appropriate.

7. Please note that the GEF financed PMC is 5.2% of project financing ($150,000 / $2,850,000); it should be 5% or lower. Please revise or provide justification for higher M&E budget.

Monitoring and Evaluation (M&E)						
Component 4. Monitoring and evaluation	Technical Assistance	4.1. Adaptive management, accountability, and effective dissemination of project results and lessons learned ensured through robust project monitoring and evaluation (M&E) system.	4.1. A comprehensive M&E system established and implemented throughout the project lifecycle wiithin PEE 4.2. Midterm review and terminal evaluation conducted	GET	$\boxed{150,000.00}$	783,818.00
				Sub Total ($)	$\boxed{\textbf{2,850,000.00}}$	**14,942,532.00**
Project Management Cost (PMC)						
				GET	$\boxed{150,000.00}$	783,818.00
				Sub Total($)	**150,000.00**	**783,818.00**
				Total Project Cost($)	**3,000,000.00**	**15,726,350.00**

Agency Response

1. Project aims to assist the relevant authorities in participatory development of the national regulatory framework, including the draft official policy and legal documents, which will be submitted for the Government review and adoption. As advised, the wording has been changed to: ?National legal and regulatory framework for Minamata Convention implementation developed?.

2. In the medical sector the direct beneficiaries of the project are female and nurses employed in nursing and cleaning roles. In Georgia, this demographic represents an economically and informationally disadvantaged group, which makes targeting them all the more significant. In the case of nurses, while they may be aware of the negative impacts of mercury, they might still lack specific knowledge regarding mercury handling protocols. Consequently, the responsibility for managing spills can often be delegated to women in cleaning duties, who are highly unlikely to be aware of even hazardous health impacts of the elemental mercury. This rationale has been more clearly articulated in the relevant sections of the project document, respectively under section 'A. Project rationale' - para 18, under section 'B. Project description' - para 38 and under section 'Stakeholders and knowledge management' - para 58.

3. The project document was adjusted to capture lessons learned within knowledge products and best practices in advancing gender equality.

4. Gender specific indicators were added to the results monitoring framework to ensure monitoring and reporting for the Gender Action Plan.

5. According to the National Waste Management Strategy of Georgia 2016?2030, improving hazardous waste management (Goal 10) is one of thirteen primary national Goals. Under this Goal, the strategy identifies the need to strengthen hazardous waste collection and processing capabilities as a significant challenge. Consequently, the first project priority is "Objective 10.1: Promoting the establishment and enhancement of hazardous waste recovery facilities."

To implement the strategic goal, the Government developed corresponding 5-year action plans that outline necessary financial resources and funding sources. Donor support is explicitly designated to fund specific activities, including Activity 10.1.1 (strengthening the hazardous waste treatment sector) under the 2022?2026 Action Plan. Because of this framework, the state budget does not currently allocate direct resources to this activity. However, this funding structure does not threaten the long-term sustainability of project Component 2 for two primary reasons:
i. Policy alignment: The component directly reflects national priorities, ensuring continuous, high-level political and policy support;
ii. Private sector demand: The component's design is based on direct consultations with the local private hazardous waste recycling sector. These stakeholders are highly interested in integrating mercury recycling technologies into their existing processing lines. Their interest is driven by market data showing a total absence of such technology in the Caucasus and Middle East, positioning Georgia to establish itself as a strategic regional hub.
We have incorporated the provided explanation in relevant parts of the project document.

6 - 7. The project budget has been revised in line with comments, by adjusting M&E and PMC costs as advised. Note there are few slight adjustments also in the component values, with the scope to maintain the total budget in line with the amount stated by the GEF OFP endorsement letter.

We have re-uploaded the budget.

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

5/18 PM confirmed

Stakeholder engagement: It is noted in the annexed Stakeholder Engagement Plan (SEP) that NGOs and CSOs will play a role in component three. However, in the list with the names of the NGOs to be engaged they are only described as secondary stakeholders. Agency should clarify the specific roles of these stakeholder organizations and groups related to project components and activities, including project plans and timing for the engagement of these groups.

1. Page 8, bullet point 3 may be better placed before bullet point 2.

2. Page 9, bullet point 7, mercury-added items are not prohibited to be sold by the convention.

3. Page 12, bullet point 14, please add GEF ID and also state more concisely that this project is built upon the lessons learned from the past GEF projects.

Agency Response

1. The order of the paragraphs was modified as advised.

2. The sentence was modified accordingly, focusing only on import and export.

3. The paragraph was modified as advised; the GEF-funded and non-GEF funded initiatives have been grouped separately with shorter descriptions.

UNIDO Second review May 19:
In regard of NGOs and CSOs, in line with the SEP's definition of primary stakeholders ? actors whose active participation, support, or input is essential for the successful delivery of project outputs ? civil society organisations have been reclassified as primary stakeholders. This reflects their essential contribution to the dissemination of the public awareness campaign, the outreach to women and underserved communities in the pilot take-back campaign, and the amplification of the project's knowledge products. We have also noted that the project's Executing Entity, the Regional Environmental Centre for the Caucasus (RECC), is itself a CSO. The relevant section (paragraph 59) of the project document has also been extended-on, in this regard. Stakeholders engagement plan (Annex I) was revised accordingly.

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 thrust and basis (including scientific) of the proposed solutions, how they provide a robust solution and listing the key assumptions underlying these?
b) Is there a description of how theGEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?
c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks are properly justified? Is there an indication of why the project approach has been selected over other potential options?
d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? 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?
e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?
f) 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?
g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this MSP)?
h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?
i) 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 description/s?
j) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?
k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?
l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request
5/18 PM confirmed with thanks

Yes

1. The barrier 4, women working in healthcare and education sectors itself is not necessarily the risk. Please elaborate more why this could be the risk.

2. Please state more concisely that this project is built upon the lessons learned from the past GEF projects and other donor projects, if any.

3. Please make more connection with the National Action Plan and nationally developed plans and the activities GEF is funding and state that they are aligned. These national plans are previously developed and how this project is assisting the country-led plan to be implemented could be better elaborated. Currently it states national plans exist but they are not addressed enough to show GEF is assisting nationally driven plans and how.

Agency Response

1. Acknowledged; the barrier break-down has been adjusted.

2.There was no such part in the ?project description? section, however a relevant paragraph has been added.

3. Relevant sections was added.

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.).

Secretariat comment at CEO Endorsement Request

5/18 PM confirmed with thanks

1. As stated above, coordination and cooperation with ongoing GEF and non-GEF financed projects/programs could be improved.

2. For the avoidance of doubt, please answer ?No? to the question ?Will the GEF Agency play an execution role on this project??

3. Referring to the letter from the interim GEF CEO to all GEF Agency coordinators dated 20 March 2026, please confirm that UNIDO will have a non-voting role in the PSC.

Agency Response

1. The section referring to coordination and cooperation with on-going GEF and non GEF projects/ programmes was improved in the document

2. We acknowledge and confirm this was corrected in the GEF Portal

3. The Following text has been added to the institutional arrangements section: UNIDO will be a member of the Project Steering Committee, participating in an advisory capacity, without exercising voting rights. All decisions adopted by the Project Steering Committee shall remain subject to UNIDO?s non-objection decision, exercised in its capacity as the Implementing Agency responsible for project supervision and oversight, in accordance with UNIDO?s applicable rules, policies, and procedures..

5.3 Core indicators
a) Are the identified core indicators calculated using the methodology included in the corresponding

Guidelines (GEF/C.54/11/Rev.01)?
b) Are the project?s targeted contributions to GEBs (measured through core 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 RequestYes

Agency ResponseN.A.
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 screened and rated and consistent with requirements set out in SD/PL/03?

Secretariat comment at CEO Endorsement Request
5/18 PM confirmed with thanks

1. Under the Innovation dimension, Institutional and Policy risk category, rephrase the related risk to anchor it explicitly to the novel governance model (MAP management framework) being introduced rather than generic capacity concerns.
2. Environmental and Social. Given the physical handling, transport and storage of mercury waste involved in the project, consider where the risk rating (and related Safeguards rating) should be moved to Moderate

Agency Response
1. Under the innovation dimension, institutional and policy risk category was revised as suggested

2. Revised as suggested.

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

Secretariat comment at CEO Endorsement RequestNA

Agency ResponseN.A.
6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities
6.1 Is the project adequately aligned with Focal Area objectives, and/or LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement RequestYes

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 Request
5/18 PM confirmed with thanks

As stated the above, the project alignment/coherent with country and regional priorities, policies, strategies and plans could be better elaborated.

Agency ResponseThe project alignment/coherence with country and regional priorities, policies, strategies and plans was further elaborated in the relevant sections.

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 RequestNA

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

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 RequestNA

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement RequestNA

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response
Focal Area Set Aside?

Secretariat comment at CEO Endorsement RequestNA

Agency Response
8.2 Project Preparation Grant (PPG)
a) Is PPG reimbursement requested and if so, is it within the eligible cap of USD 50,000?
b) 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 Request
5/18 PM confirmed with thanks

Please clarify what PPG-eligible activity is represented by the budget line item ?Follow-up on co-financing commitments? ($3,000). Please refer to the table of indicative eligible PPG expenditures in the Guidelines (p. 9-11)

Agency Response

To ensure clarity, the budget line has been renamed as "Consultations with stakeholders, including prospective co-financing partners". The expenditures under this line were revised according to the Guideline:

(i) Translation of project preparation documents (concept note inputs, co-financing letters, and related correspondence) into and out of English - eligible under the item "Costs of translating documents into and out of English".

(ii) Consultations with stakeholders, including prospective co-financing partners - eligible under "Local consultations [?] to discuss specific project and program ideas" and "Travel costs for local experts for consultations and discussions with interested parties and stakeholders".

8.3 Source of Funds
Does the sources of funds table match with the OFP?s LOE? Note: the table only captures sources of funds from the country?s STAR allocation

Secretariat comment at CEO Endorsement RequestNA

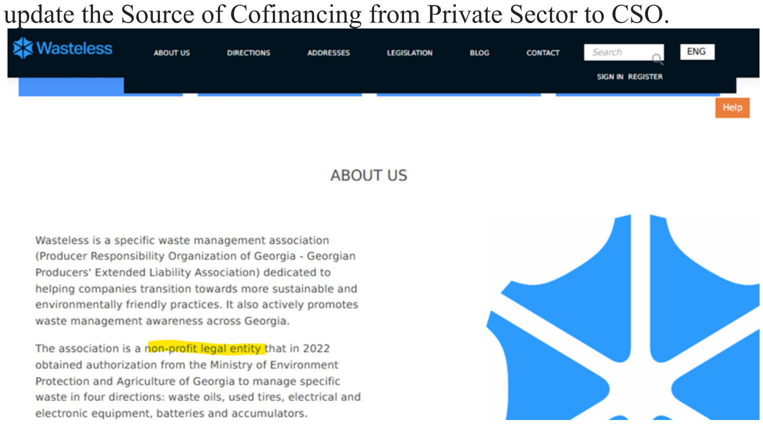
Agency Response
8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines? e.g. Have letters of co-finance been submitted, correctly classified 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 Request

5/18 PM confirmed with thanks

1. Wasteless appears to be a CSO rather than a private sector entity. Please confirm and, if so, update the Source of Cofinancing from Private Sector to CSO.



2. The in-kind contribution of USD 2,187,000 from the Regional Environmental Centre for the Caucasus appears to be better classified as Public Investment (Investment Mobilized) or possibly Grant (Investment Mobilized), if these funds are directly supporting project ID 12288. Please review.

3. Please submit a cofinancing letter for the UNIDO grant contribution.

Agency Response

1. Wasteless is a Producer Responsibility Organization, which in Georgian legislation has a non-profit nature. As it is industry-led, it does not classify itself as a CSO, per se, which is why ?other? option was selected. However, we revised this in line with the Secretariat recommendation.

2. The amount represents the aggregated grant value of four other ongoing, third-party-funded projects implemented by REC Caucasus. Their funding has been mobilized by IGNITE; rather, their activities align with and complement IGNITE objectives. The USD 2,187,000 contribution has been separated out as Public Investment (Investment mobilized), as suggested..

3. The upload Tab for co-financing was not available during initial submission. With thanks to GEF IT team, the tabs have been made available. All letters have been (re)submitted.

Annex B: Endorsements

8.5 a) 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 RequestYes

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 RequestYes

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 RequestYes

Agency Response

8.6 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project before the PIF submission?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

Annex C: Project Results Framework

8.7 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 the budget (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?

Secretariat comment at CEO Endorsement Request

5/18 PM confirmed with thanks

1. On Indicator 9.2 on mercury, it is unclear if the 2.5 tons include or not the 550kg of mercury described under the justification for indicator 9.6. If the 550kg value is annual and this amount is expected to be treated in project years 3 and 4, then it should be double this volume. Please adjust the value of 9.2 upward as needed.

2. Likewise, on indicator 9.6, please clarify if the value of 55 tons as an annual import figure and related computation

3. Linked to this is the fact that the project acknowledges that a baseline study on mercury consumption and disposal patterns (Output 1.1.2) will be conducted during project implementation. Given values for indicators 9.2 and 9.6 should be grounded on the findings of this study, it'd help to confirm that this study will be conducted early in project implementation and acknowledge that any material divergence from assumed targets should yield to update such targets.

4. On indicator 11 related to direct beneficiaries, please consider a more conservative target based on GEF-8 RMF guidance on the continuum of intensity considered that helps identify who may be counted as Direct beneficiaries. Currently, close to half of the population aged 18-65 is counted.

5. Please ensure that the project results framework include indicators that are in the Gender Action Plan

Agency Response

1. The 2.5 t reported under Indicator 9.2 excludes the 550 kg referenced under Indicator 9.6. The two values reflect distinct pathways:

- 2.5 t is mercury release avoided through environmentally sound disposal of MAPs waste. Derived from the 1.6 t/year baseline release; the project targets an 80% reduction

(1.25 t/year), applied across project years 3 and 4 ? hence the 2.5 t over the project lifecycle.

- 550 kg mercury is prevented from entering the country through control of MAPs imports. Derived from: 55,000 kg/year of potentially mercury-containing imports ? 10% assumed to actually contain mercury ? 10% mercury content by mass ? 550 kg/year.

We confirm that the 550 kg is an annual figure and that import controls are expected to be operational in project years 3 and 4 (consistent with the regulatory framework being adopted in the preceding year). However, as this figure is based on the MAPs, for which a separate indicator is filled, adding this would be double-counting; therefore, we have kept the initial 2.5 tonnes.

In order to avoid confusion regarding the origin of the ?550kg? figure, it has been removed from the narrative and only ?5.5 tonnes? has been kept (the prevented MAPs imports volume)

2. 55 t is the annual import figure of potentially mercury-containing products, which has been calculated by the HS-code based import data analysis of relevant products - relays, switches, non-electronic thermostats, fluorescent lamps, etc. The 11 t value reported against Indicator 9.6 is computed as follows: Annual import of potentially mercury-containing products - 55,000 kg/year; Conservative assumption: share actually containing mercury - 10%; Mercury-containing products avoided per year - 5,500 kg/year (5.5 t/year); Years of effective import control (project years 3 and 4) - 2; Hence the total prevented imports over project lifetime - 5.5x2=11tonnes.

Additionally, the project will eliminate 100?1,000 kg of legacy mercury-containing products collected through the institutional and public take-back programmes, which was currently omitted from calculation; Thus we have revised the 9.6 target to incorporate the additional 0.1?1.0 t of collected legacy waste.

3. We confirm that Output 1.1.2 (Technical study on the national consumption of MAPs and the mercury-containing waste generation and disposal) will be conducted within the earliest stages of project implementation. We further acknowledge that the current values for Indicators 9.2 and 9.6 are based on conservative estimates derived from the 2017 Mercury Initial Assessment. Should the findings of Output 1.1.2 reveal a material divergence from these assumed values, the project will revise the targets for Indicators 9.2 and 9.6 accordingly and report the revision. The same has been reflected in a project document.

4. The indicator for people targeted through the awareness-raising campaign was removed from the list of direct beneficiaries. Also, the duplicates that slipped into the list of indicators were removed. Additionally, the previous target of 40% of households benefiting per pilot municipality was modified with a more precise estimate. The total number of direct beneficiaries thus amounts to 34,105 people, with 17,395 being female and 16,711 being male.

5. The gender indicators provided within the Gender Action Plan were formulated as outcome-level indicators and incorporated into the results framework.

Annex E: Project map and coordinates

8.8 Are geo-referenced information and maps provided indicating where the project interventions will take place ?

Secretariat comment at CEO Endorsement Request

5/18 PM confirmed with thanks

Yes however, this could be more zoomed in for more details for us to understand where activities are happening . Consider adding geonames ID as available at geonames.org

Agency ResponseThe map was replaced; locations being specified.

Annex F: Environmental and Social Safeguards Screen and Rating

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

Secretariat comment at CEO Endorsement Request

5/18 PM confirmed with thanks

We note that UNIDO has attached environmental and social risk screening documents and stakeholder engagement plan. An overall ESS risk is classified as Moderate.

1. Please provide environmental and social risk management framework with identified environmental and social risks and mitigation measures with budget and timeline at the CEO Approval stage. Please also ensure that identified mitigation measures are integrated into the project design.
2. Please clarify how local Small and Medium-sized Enterprises (SMEs) and waste management sector (including informal sectors) were consulted during project preparation and how the results of consultations were integrated into the project design.
3. Please consider local Small and Medium-sized Enterprises (SMEs) and waste management sector (including informal sectors) as key stakeholders and as a partner of the project throughout project implementation.
4. Both UNIDO Environmental and Social (E&S) Screening document and Environmental and Social Safeguards in D. Policy requirements (page 41) said E&S risks as Moderate. However, the environmental and social risk in the Key Risks table (page 27) said Low risk. Please make this consistent with Environmental and Social (E&S) Screening document.

Agency Response

1. The ESMP document is being re-uploaded. An effort has been taken to ensure that the ESMP is integrated into a project design, by including budget and timeline.

2. Local SMEs and the waste management sector representatives were consulted during the PPG phase as part of the stakeholder consultation workshops, described in the Stakeholder Engagement Plan (SEP), which lists every consultation event. The Private Sector Consultation Workshop (6 September 2025), brought together representatives of waste-relevant private sector companies including:
Ltd Amboli - Category II
Ltd Impexfarm - Category I
Ltd Kontafarma - Category IV
Llc Transcaucasian Distribution Company - Category III
Ltd PS Enerji - Category IV
Ltd PSP Pharma - Category I
Ltd Aversi Pharma - Category I
Georgian Dental Association - A proxy to the Dental businesses
Ltd Akhali Nateba - Category II
As shown by the list, out of nine private sector company and one association, 3 of them were category I businesses (i.e. large businesses), 3 of them were Category II businesses (i.e. Medium businesses), and 3 of them - were category III or IV businesses (i.e. small businesses). Other stakeholder workshops also included the private sector representatives and among them - SMEs:
LTD "Zugo" - Category III
Investor Counsil
LTD EcoCane - Category IV
LTD Gogora - Category IV

LTD Georgia Packaging - Category II
Hilton Garden Tbilisi - Category I
Tene - Category IV
Hilton Batumi - Category I
Ltd Davicvat Garemo Kvlavcarmoebit (d.g.k) - Category IV
LTD ?Georgian Wine? - Category I
LTD ?Bio-compost? - Category IV

While the informal sector could not be directly consulted by the project, the municipal cleaning service representatives from Batumi, Samtredia, Kobuleti, Zugdidi, Lanchkhuti, Khelvachauri, Keda, Kutaisi, and Poti, as well as recyclers (Zugo, Biocompost), which are the direct interface with informal waste collection in Georgia, provided ground-level input on how mercury-containing items currently move through both formal and informal disposal channels
- The results of these consultations were integrated into project in the following ways:
- The ten waste management companies has been identified as Primary stakeholders under the Co-production engagement modality for Component 2 (SEP Annex 1).
- The Output 2.1.1 explicitly includes "smaller operators" in the pool of potential partner candidates; Besides, considering the nascent nature of the waste recycling particularly hazardous waste recycling, sector in Georgia, the mercury treatment technology implementation has been subsidized by the project to de-risk private sector investment. The decision reflects the sectoral concerns voiced both by the waste operators and waste management policy-makers.
- Output 3.1.2 incorporates a dedicated SME-targeted component, delivering information on phase-out timelines and mercury-free alternatives to small and medium-sized enterprises and rural and regional retailers through municipal partnerships and plain-language formats. This element was added specifically in response to the affordability and accessibility concerns voiced by smaller operators during the PPG.
- The cost-effectiveness analysis for mercury-free alternatives under Output 1.1.2 was structured to explicitly assess affordability for SMEs and low-income households, to prevent the new framework from generating patterns of social exclusion.
- The engagement of municipal waste service operators and NGOs mapped within the SEP provides the implementation channel through which informal-sector concerns will continue to be reflected, as these actors are best placed to reach waste pickers and informal collectors.

3. The waste management sector representatives have been identified under the SEP as primary stakeholders for the project.
The stakeholders engagement plan also identifies other private sector actors (Pharmacies, importers/distributors, etc.) as primary stakeholders. The annex of the Plan - the mapping of individual actors - includes both - large businesses and SMEs. In addition kindly note that explicit paragraph was added to the project document .

In addition to the above, explicit mention has been added to the project document itself.

4. The Key risk table (page27) was corrected and aligned with the E&S document.

Annex G: GEF Budget template

8.10 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 Request

5/18 PM confirmed

Budget table:

1. The budget table is cut off at the left margin. Please consolidate all output columns in the respective component to reduce the large number of columns.

2. Please re-categorize ?Contractual services? to either ?Contractual services to individuals? or ?Contractual services to companies? as relevant.

1. Please use the expenditure category ?Trainings, Workshops, Meetings? for any similar events in the budget. They should not be included in Contractual Services, as is presented.

	for customs clearance points																
Contractual services	[3301] National Workshops/Conferences	6000	6000	6000	6000	2400	2400	2400	400	10100	10100	10100	61900	0	0	61900	RECC
	[3302] Trainings	6000	6000	6000	6000	10500	10500	10600	4200	12850	12850	7000	92500	0	0	92500	RECC
	[3303] Awareness raising Events	3000	3000	3000	3000	5900	5900	4000	2000	6294	6295	8295	50684	0	0	50684	RECC
	[5503] Inception Workshop	8000	0	0	0	0	0	0	0	0	0	0	8000	0	0	8000	RECC
	[5504] Steering Committee	3000	3000	3000	3000	0	0	0	0	0	0	0	12000	0	0	12000	RECC
	[5501] Midterm Evaluation	0	0	0	0	0	0	0	0	0	0	0	0	25000	0	0	UNIDO
	[5505] Closing Workshop	0	0	0	0	0	0	0	0	3000	3000	2000	8000	0	0	8000	RECC
	[5502] Terminal Evaluation	0	0	0	0	0	0	0	0	0	0	0	0	25000	0	0	UNIDO
																	RECC

2. The cost item ?[2303] Procurement of 4 mercury detection devices for customs clearance points? is miscategorized; please use the ?Goods? expenditure category.

3. The very large budget is dedicated to personnel, which currently takes up 61% of the total GEF budget. Typical GEF project budgets allocate one-third or less of GEF financing to project personnel (staff + consultants). Please review the budget for cost efficiencies to bring the budget in line with the GEF portfolio. Significant numbers of national consultants are hired, please clarify if the operation is sustainable after the project period.

4. In the resubmission, please include brief but clear Terms of Reference (TORs) describing unique outputs linked to the respective components for personnel carrying out long-lasting tasks funded with GEF resources. For example, please elaborate the work of GIS expert. These should be included as an annex to the CEO Approval document and/or the Agency prodoc - we will review the budget table and provide comments if appropriate.

Agency Response

1 and 2 - Suggested correction were taken into account and the budget was revised

3. Careful assessment was performed on the needed budgetary items under each project component. In the revised version the total cost of personnel is 31% of the budget. The number of consultants have been revised as well. Regarding sustainability, this is ensured by the significant resources allocated to institutional dialogue, workshops, roundtables, and the collaborative preparation of deliverables. Furthermore, training for enforcement capacity-building and the development of knowledge products play a key role. All these measures ensure that the project is owned by the national institutions; thus, its results possess a high level of sustainability.

4. Requested ToRs have been prepared and annexed.

2nd Review response 19 May:

1. We re-uploaded the budget in the portal

2. Contractual services category was diferentiated, as sugested, into Contractual services to individuals? or ?Contractual services to companies? as relevant

Annex H: NGI Relevant Annexes

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

b) Does the 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 RequestNA

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

	1SMSP CEO Approval	Response to Secretariat comments
First Review		5/5/2026
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		