



# Accelerate Minamata Convention compliance through improved understanding and control of mercury trade in Latin America

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

11047

**Countries**

Regional (Bolivia, Colombia, Ecuador, Honduras, Mexico, Peru)

**Project Name**

Accelerate Minamata Convention compliance through improved understanding and control of mercury trade in Latin America

**Agencies**

UNEP

**Date received by PM**

12/1/2023

**Review completed by PM**

4/24/2024

**Program Manager**

Evelyn Swain

**Focal Area**

Chemicals and Waste

**Project Type**

FSP

**PIF**

**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

Yes.

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?**

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

**3. Project Description Overview**

- a) **Is the project objective statement concise, clear and measurable?**
- 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 budgeted for?**
- d) **Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**
- e) **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 theory of change has been updated based on comments by STAP, but the theory of change diagram is blurry and illegible in the portal document. Please clarify the theory of change.

Unclear of the role of customs authorities in the project other than receiving training, how will they be equipped, capacitated etc? They should be central to the project. Also the project should work closely with the relevant Regional Intelligence Liaison Offices of the World Customs Organization particularly on achieving scale and replication to other regions. The RILO would be better placed in an executing role and should be included in the stakeholder engagement plan.

Gender is dealt with only vaguely in the prodoc such as ?Gender responsiveness should be incorporated into the assessments of mercury trade including how it affects different groups and women?s role along the supply chain, ensuring that women's specific concerns are represented in the agreements?, however the underlying activities do not articulate how gender in decision making etc is incorporated. Please revise using inputs from the gender action plan.

Activity 3.3.2 - Please confirm data will be publicly available and published on the Minamata Sec website.

ES, 4/24/24: Comments cleared.

#### Agency Response

Agency Response ? 8 April 2024

1. ToC diagram has been adjusted in the portal to make it legible.
  
2. Please note that customs authorities from all target countries will receive not only trainings but also to play an active role as part of the national coordinating mechanisms and a international advisory board , both to be created under the institutional arrangements of the

project. They will participate regularly in all project activities and review of project deliverables. The details of how the custom authorities will be equipped and capacitated will vary across countries, however, this will be discussed and determined during the inception stage of project implementation.

Regional Intelligence Liaison Office of WCO has been added to the stakeholder engagement plan and is expected to collaborate and actively participate as a member of the International Advisory Board (IAB) according to the Institutional Arrangements of the project. Initial exchanges took place during the PPG phase and will be resumed during project inception.

3. Activities have been updated in the main project documents, based on the greater level of detail in the gender action plan (appendix 5b)

4. Activity 3.3.2 has been updated indicating information will be made publicly available and published on the Minamata Convention Website based on discussions with and prior consent from target countries.

#### **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 RequestThe project rationale is sound and is consistent with what was expected at PIF stage.

#### 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) 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?**
- c) 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?

**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 FSP/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 design and 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

Please see my comment above on theory of change.

The project description is sound. Project co-financing has nearly double since PIF stage. The beneficiaries have also been defined during PPG.

ES, Comment cleared.

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.).**

Secretariat comment at CEO Endorsement RequestThe institutional arrangements are appropriate and consistent with PIF stage.

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)?
  - 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 RequestCore indicators are appropriate.

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

Please consider the risks related to the criminal activity related with illegal trade of mercury.

ES, 4/24/24: Comment cleared.

Agency Response

Agency Response ?8 April 2024

Risk identified under Political and Governance risk category and planned mitigation measures are indicated.

#### 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 RequestNA

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?**

Secretariat comment at CEO Endorsement Request Yes, this project is aligned with the GEF-8 CW 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 Request Yes, this project is aligned with Minamata Convention priorities in the countries.

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 NA

Agency Response

**7 D. Policy Requirements**

**7.1 Are the Policy Requirement sections completed?**

Secretariat comment at CEO Endorsement Request

PPO provided the following comments:

1. On Stakeholder Engagement (comment provided by Gabriella): The project document refers to an Appendix 7., but I can't local the stakeholder engagement plan for this project. Please ask agency to upload the stakeholder analysis and engagement plan.

2. On Co-financing (comment provided by Omid):

a. Please request UNEP agency, US EPA, and Minamata Convention Secretariat, to provide a co-financing letter with an updated date (existing co-financing letter is dated in 2021) or to provide an updated estimation of the actual amount that the agency think will go to the project considering the timeframe for both ? the co-finance and the GEF project.

b. Grant is investment mobilized normally. Please request the agency to revise where ?grant? is classified as ?recurrent expenditures?.

3. On GEO Location Information (comment provided by Omid): Fields related to the geo location of project activities are empty. Please add the location of project activities, location name, latitude, longitude, Geo Name ID (if applicable), and other relevant information in the dedicated fields.

4. On Gender (comment provided by Verona): In addition to PM?s comment, I would like to add: 1) On references to the establishment of "national coordination mechanism grouping" [Component 1] or similar mechanisms established, please ensure there is gender expertise, in addition to "gender balanced" composition. 2) On references to workshops, consultations to be undertaken, please ensure to bring in gender expertise, in addition to ensuring women's participation. 3) Trainings to be developed and conducted should also engage gender experts, in addition to having women among the participants/beneficiaries. 4) Please ensure better reflection of gender perspectives, gender expertise and women's participation in Outcome 3, in particular, relating to the mentioned Regional Forum. 5) On the Andean Observatory, are gender-specific concerns expected to be among the data to be collected/captured? 6) Please ensure that gender-related results are monitored and reported on (included in M&E outcome).

ES, 4/24/24: Co-financing: Grant is ?investment mobilized? normally. Please request the agency to revise where ?grant? is classified as ?recurrent expenditures? to ?investment mobilized? for Alliance for Responsible Mining (\$84,300), BCCC-SCRC Uruguay (\$75,000), Natural Resources Defense Council (\$30,000), Swiss Better Gold Initiative (\$150,000). For these sources of co-financing, please describe the investment mobilized portion of the co-financing below the co-financing table.

Stakeholder engagement: the agency has not addressed the comment on stakeholder engagement. They again state that they have uploaded the stakeholder analysis and stakeholder engagement plan (annex 7) but we can still not locate it.

ES, 5/7/24: Comment cleared

## Agency Response

Agency Response ?8 April 2024

1. Appendix 7 and Appendix 5c.b. Stakeholder engagement plan appendices have been uploaded to the GEF portal .



2.a. UNEP, US EPA, and Minamata Convention Secretariat co-financing letters all have a corresponding supplementary e-mail sent during 2023, validating the stated co-financing for each entity.

2.b. Co-financing type has been revised as per the comment provided. All co-financing entries have been checked and revised

3. The project plans to organize workshops and capacity-building activities in the participating countries. However, at this stage, a specific location cannot be determined. Therefore, the geo coordinates are based on project country capitals as the intervention site, with activity descriptions pending development.

4. Gender considerations revised and better reflected on project's activities. Gender expertise as suggested is certainly planned (including a gender expert budget line) and has been explicitly added in the project description section.

#### Agency Response -2 May 2024

5. After further review of the co-financing letters, definitions of co-financing from GEF rules, and previously CEO endorsed projects in our portfolio, the type of co-financing from Alliance for Responsible Mining, Swiss Better Gold Initiative, BCCC-SCRC Uruguay and Natural Resources Defense Council have been revised to "in-kind" and classified as "recurrent expenditure".

6. With apologies for the confusion, the Stakeholder Engagement Plan is Appendix 5 c.b. It has been reuploaded as 'Public' classification and we hope it is accessible. We confirm that the CEO ER does not mistakenly refer to Appendix 7 for the Stakeholder Engagement Plan. (Appendix 7 is the implementation arrangement appendix and unrelated to stakeholders).

#### **7.2 Is the Gender Action Plan uploaded?**

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

#### **7.3 Is the stakeholder engagement plan uploaded?**

Secretariat comment at CEO Endorsement Request Yes.

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 RequestYes.

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 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 RequestYes.

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 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 Request Yes.

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?**

Secretariat comment at CEO Endorsement Request Yes.

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 Request Yes.

Agency Response

**Annex G: GEF Budget template**

**8.8 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 Yes.

Agency Response

22/12/2023

GEF budget template annex converted to word and re-attached.

**Annex H: NGI Relevant Annexes**

**8.9 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 RequestNA

Agency Response

**Additional Annexes**

**9. GEFSEC DECISION**

**9.1.GEFSEC Recommendation**

**Is the project recommended for approval**

Secretariat comment at CEO Endorsement Request

Not at this time. There are some questions above. Also, please clarify in Annex 1 in the responses to council comments which council member the comments refer to. It is not clear who the Council comments are coming from.

ES, 4/24/24: There are two comments remaining, on co-financing an stakeholder engagement, that need to be addressed.

ES, 5/7/24: Comments have been addressed. This project is PM recommended for approval.

**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**

	<b>CEO Approval</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>2/27/2024</b>	
<b>Additional Review (as necessary)</b>	<b>4/24/2024</b>	
<b>Additional Review (as necessary)</b>	<b>5/7/2024</b>	
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		