Integrated Management for Sustainable Reduction (IMSRed) of POPs, Highly Hazardous Pesticides, and industrial chemicals in Argentina

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID	11451
Countries	Argentina
Project Name	Integrated Management for Sustainable Reduction (IMSRed) of POPs, Highly Hazardous Pesticides, and industrial chemicals in Argentina
Agencies	UNDP
Date received by PM	1/28/2025
Review completed by PM	7/15/2025
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 RequestYes.

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

The summary lists the components rather, please provide a narrative summery of what the project will do.

ES, 5/7/25: Please ensure the 250 word limit is met. Also please comment in the section below how this comment has been addressed.

ES, 5/7/25: Comment addressed.

Agency Response
04/04/2025
R:/ Done
Please, refer to Section ?Project Summary? of CEOER (addition is highlighted in yellow)

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

Output C.2 "Disposal of mercury waste achieved and POPs" is not clear. It is not clear what the POPs activity will be in table B.

ES, 5/7/25: Please comment in the section below if and how this comment has been addressed.

ES, 7/10/25: On cofinancing: the letter of cofinancing for the Minera Andina del Sol SRL indicates 100,000 in-kind. The portal shows amount of USD 11,600,000. Please revise the cofinancing table accordingly to match the letter of support with the correct amount and type of cofinancing.

ES, 7/15/25: Comment addressed.

Agency Response
04/04/2025

R:/ Thanks for your comments.

POP management related activities will be carried out under Output C.1. Indeed, Output C.2 only refers to mercury disposal. Apologies, it was a typo.
Correction made, it now reads as follows: ?Output C.2 Disposal of mercury waste achieved? which is highlighted in the following sections:

CEOER Sections:
- Project Description Overview
- Activity A.1.i (under the Project Approach Section)
- Output C.2 (under the Project Approach Section)

ProDoc:
- Activity A.1.i (page 44)
- Output C.2 (page 61)
- Table 7: FSP components, outcomes, outputs and activities (page 71)
- Annex IV Multiyear work plan (page 154)

In addition, in the Section Risks to Project Implementation Output C.1 was added to reinforce activities related to POPs, which are not covered by Output C.2.
CEOER:
- Risks to Project Implementation, it was added Output C.1 and C.2 under the column ?ASSESSMENT AND MITIGATION MEASURES? (also highlighted in yellow).

ProDoc:
- Tabla 11 (page 83):

Risk 4 (Output C.1 and C.2)
Risk 6 (Output C.1 and C.2)
Risk 7 (Output C.1 and C.2)
Risk 8 (Output C.1 and C.2)
Risk 9 (Output C.1 and C.2)

Please, also note the following comment: under the Minamata Convention, Argentina is obliged to address emissions of mercury and mercury compounds to the atmosphere and, where feasible, reducing these emissions. Following this guideline, this project will also support a holistic approach to improve the management of mercury waste and the adoption of alternatives to respond to the need to halt mercury pollution by large industrial activities as well as waste containing small amounts of mercury from different sources.
Under Output C.2, the project will implement two activities, one aiming at the elimination of mercury waste generated by the mining industry by supporting the national environmental authorities in this endeavor, as a follow up to the preceding UNDP/GEF FSP 10094, and another at

the elimination of waste generated by small amounts of Hg-containing products, such as mercury lamps, dental amalgams and medical and laboratory instruments.

Therefore, the description of mercury-added products was incorporated in the corresponding sections to complement the above information as highlighted in yellow in Section C.2.ii of CEOER and C.2.ii (page 62) of ProDoc.

Finally, a reference is corrected due to a typo. It now reads as follows: ?Based on the result of Activity A.1.ii of Component 1?.? instead of ?Based on the result of Activity A.1.iii of Component 1 Section C.2.ii of CEOER and C.2.ii of ProDoc (page 62).

UNDP Response 07/11/25:

On 5/7/25 it was requested the following by the GEF Sec (see comments below): The letter of cofinancing for the Minera Andina del Sol SRL amount of USD 11,600,000 is missing. The uploaded letter of support is not relevant.

UNDP responded on 6/3/25 that the letter of support uploaded originally for USD 100,000 was a mistake. The correct cofinancing letter from Minera Andina del Sol SRL for USD 11,600,000 in grant was uploaded in the GEF portal on 6/3/25. Hence, USD 11,600,000 of co-financing from Minera Andina del Sol SRL is the correct amount in the cofinancing table.

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 current situation and rationale is well described.

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

TOC is missing the key assumptions.

The description of how this project builds on the last CW project should be strengthened.

Gender is a separate component and not well describe throughout the components. Please ensure that relevant outputs and activities in the RF have gender-specific indicators. Under M&E, please include plans to monitor and regularly report on gender-specific results and the Gender Action Plan.

Please strengthen stakeholder engagement within this project.

ES, 5/7/25: Please comment in the section below if and how these comments have been addressed.

ES, 5/9/25: Comments addressed.

Agency Response
04/04/2025

Thanks for these comments.

TOC

R:/ Key assumptions were added and highlighted in yellow.
Please, refer to the CEOER Section The Project Approach.

Description of how this project builds on the last CW

R:/ Please refer to:

CEOER:

- **Seccion A: Project Rationale - The current situation for POPs and UPOPs.**

Added text and highlighted in yellow: *During the implementation of the UNDP/GEF Project 10094 it was estimated that at least 200 tons of obsolete pesticides remain, exclusively from health applications and phytosanitary use in public services. This stock does not have an official consolidated registry, which is a major gap for its sound management.*

- **Seccion A: Project Rationale- For mercury.**

Added text and highlighted in yellow: *There are gold mining activities that generate large amounts of mercury as waste, which demands the need to manage it. UNDP/GEF Project 10094 included activities to support the elimination of 350 metric tons of elemental mercury from this sector, but this is not enough. Presently, there are two mining projects in execution in the San Juan Province that generate mercury during gold mining. It is estimated that the country generates approximately 70 tons of mercury each year as waste that still needs to be treated following environmentally sound disposal.*

- **Seccion B: Project Description.**

Added text and highlighted in yellow: *This project also aims at providing a significant impulse to continue strengthening the national capacity to manage industrial POPs within the framework of the national regulatory and political context ?and international guidelines on chemical substances and hazardous waste management ?technically speaking- following the satisfactory Mid-term Review of the preceding UNDP/GEF Project 10094 where was suggested to strengthening the relationships with the private sector, CSOs, academia and scientific and technological sector, under the leadership of the national environmental authority.*
One of the main conclusions of the UNDP/GEF Project 10094 is that, based on the update of the inventory of POPs from intentional and unintentional generation, 21 sites of environmental interest were identified as possible sources of POPs emissions, as shown in the following Table

Also, added Table and highlighted in yellow: *Identified sites with hazardous waste repositories in Argentina".*

There is a substantial linkage between relevant activities carried out during the implementation of the UNDP/GEF Project 10094 and the IMSRed FSP, as shown in the following table:

Building synergy between UNDP/GEF Project 10094 and the IMSRed		
UNDP/GEF Project 10094	IMSRed	CEOER Page

During the implementation of the UNDP/GEF Project 10094 it was estimated that at least 200 tons of obsolete pesticides remain, exclusively from health applications and phytosanitary use in public services. This stock does not have an official consolidated registry, which is a major gap for its sound management.	Activities under Output B.1 builds on Project 10094.	Seccion A: Project Rationale - The current situation for POPs and UPOPs (page 7)
There are 350 metric tons of elemental mercury from gold mining activities	Under Output C.2, the IMSRed project will implement two activities, one aiming at the elimination of mercury waste generated by the mining industry by supporting the national environmental authorities in this endeavor, as a follow up to the preceding UNDP/GEF FSP 10094, and another at the elimination of waste generated by small amounts of Hg-containing products, such as mercury lamps, dental amalgams and medical and laboratory instruments.	Seccion A: Project Rationale- For mercury (page 8)
In Section B. of CEOER, the IMSRed project aims at providing a significant impulse to continue strengthening the national capacity to manage industrial POPs within the framework of the national regulatory and political context ?and international guidelines on chemical substances and hazardous waste management ?technically speaking- following the satisfactory Mid-term Review of the preceding UNDP/GEF Project 10094 where was suggested to strengthening the relationships with the private sector, CSOs, academia and scientific and technological sector, under the leadership of the national environmental authority.		Seccion B: Project Description (page 21)
One of the main conclusions of the UNDP/GEF Project 10094 is that, based on the update of the inventory of POPs from intentional and unintentional generation, 21 sites of environmental interest were identified as possible sources of POPs emissions.	Activities under Output B.1 *?Management plans for source emissions control in environmental concern sites with presence of POPs, and other Chemicals of Global Concern implemented,?* builds on Project 10094.	Seccion B: Project Description (page 21)
Related to the country?s needs of Institutional enabling environment for POPs, HCs and harmful chemical waste sound management .	Activities under Output A.3 *?Integral monitoring Programme for POPs and UPOPs implemented, inventories updated, emissions estimation*	Seccion The Project Approach - Outcome A (page 25)

The execution of the previous UNDP/GEF Project 10094 revealed a high presence of POPs, highly hazardous chemical substances, and mercury in the industrial sectors under the different environmental monitoring implemented, which contributed to the generation of a national baseline for these harmful substances.	*and report submission (NIP Update) improved?* builds on Project 10094.	Seccion The Project Approach - Output A.3 (Page 30)
Regarding the need to strengthen linkages with the private sector, this project proposes the development of two (2) pilots that promote BET/BAT in key industrial sectors, such as the petrochemical, textile, and painting industries.	Activities under Output B.2 *?Introduction of BAT/BEP for Industrial POPs, new POPs and chemicals of global concern emissions prevention in manufacturing industries successfully developed?* builds on Project 10094.	Seccion The Project Approach - Output B.2 (Page 36)

To strengthen the link between the last CW project and this project, please refer to the highlighted paragraphs in CEOER

- Seccion The Project Approach - Outcome A.

As the country?s needs with regards to chemicals and waste management are enormous, this project builds on its predecessor?s achievements, i.e. UNDP/GEF Project 10094 while increasing ambition and scale for the elimination goals of POPs, chemicals, and establishing waste management structures. This outcome will enhance the ground to cope with the policy and regulatory barriers identified during the Theory of Change analysis. During its implementation, this project will also consider the future challenges of managing the new POPs to be listed under the Stockholm Convention.

- Seccion The Project Approach - Output A.3.

As the country?s needs with regards to chemicals and waste management are enormous, this project builds on its predecessor?s achievements, i.e. UNDP/GEF Project 10094 while increasing ambition and scale for the elimination goals of POPs, chemicals, and establishing waste management structures. This outcome will enhance the ground to cope with the policy and regulatory barriers identified during the Theory of Change analysis. During its implementation, this project will also consider the future challenges of managing the new POPs to be listed under the Stockholm Convention.

- Seccion The Project Approach - Output B.2.

As the country?s needs with regards to chemicals and waste management are enormous, this project builds on its predecessor?s achievements, i.e. UNDP/GEF Project 10094 while increasing ambition and scale for the elimination goals of POPs, chemicals, and establishing waste *management structures. This outcome will enhance the ground to cope with the policy and regulatory barriers identified during the Theory of Change analysis. During its implementation, this project will also consider the future challenges of managing the new POPs to be listed under the Stockholm Convention.*

ProDoc: Please refer to the highlighted text

Paragraph 13 (page 15)
Paragraph 18 (page 16)
Paragraph 22 (page 17)
Paragraph 30 (page 18)
Paragraph 73 (page 36)
Paragraph 93 (page 41)
Paragraph A.3 (page 46)
Paragraph B.1 (page 51)
Paragraph B.2 (page 52)
Activity D.1.i (page 63)

Gender

R:/ Please refer to:

CEOER

- Please refer to the highlighted paragraphs in **Section The Project Approach ?**

Outcome A

Added text and highlighted in yellow: *Regarding gender mainstreaming in this Outcome, predominantly in the axis of access to knowledge developed in the Gender Action Plan (Annex 10) will be addressed. In this sense, actions will be developed to reduce difficulties in accessing technical knowledge for those populations and promoting their entry to STEM careers (Science, Tech, Engineering, and Math). The inclusion of gender and vulnerability perspective will be promoted in extension and territorial linkage projects implemented from universities.*

Outcome B.

Added text and highlighted in yellow: *For gender mainstreaming in this Result, the project will work with the specific actors of the pilot projects described below. All the addresses mentioned in the Gender Action Plan (Annex 10) will be worked on. Among the activities to be developed, work on gender stereotypes related to work with dangerous substances, particularly with masculinities, is contemplated by promoting care in the workplace and the democratization of care tasks. Likewise, the entry and permanence of women and vulnerable groups in formal employment and decision-making positions will be addressed, especially in positions that require technical knowledge. To this end, the aim is to design a strategy appropriate to the different types of actors involved in the pilot projects and their capacities.*

- **Section The Project Approach - Output B.1.**

Added text and highlighted in yellow: *From an inclusion perspective (Annex 10), actions under this Output include the Identification of gaps and causes of segregation in the workplace specifically aimed at large industries such as chemical and petrochemical corporations, industrial estates, large enterprises, and other stakeholders related to sites of environmental concern. The IMSRed project will also analyze the causes of the predominance of vulnerable groups in informal jobs by retrieving updated data and staff reports, specifically aimed at SMEs and recycling cooperatives included in pilot projects (Output B3) and in key industrial sectors, such as the petrochemical, textile, and paint (Output B.2)*

- **Seccion The Project Approach - Output B.3**

Added text and highlighted in yellow: *Also, from this perspective, analyze the obstacles to acquiring technical skills and identifying training needs in recycling cooperatives and SMEs involved in pilot projects from Output B3 to reduce difficulties in accessing technical knowledge.*

- **Seccion The Project Approach - D.1.i Developing a Communication and Content Dissemination Plan**

Added text and highlighted in yellow:**:** *Build a strategy directed to key industrial sectors referred above that promote best practices focused on incentives for the entry and permanence in employment by designed training in key industrial sectors, such as the petrochemical, textile, and paint, as the Gender Action Plan (Annex 10).*

- **Seccion The Project Approach - D.1.ii Implementing the Gender Action Plan.**
- Added text and highlighted in yellow:**:**

? *Build focused training based on the analysis of each facility to create spaces for reflection in different work environments, as per the Line of Action of Annex 10.*

? *Design a specific technical training plan in accordance with the analysis and evaluating the results with the stakeholders involved to reduce difficulties in accessing technical knowledge, as per the Line of Action of Annex 10.?*

ProDoc:

- **Paragraph 96 (page 42).**

Added text and highlighted in yellow: **?***will be addressed, specifically to analyze data on income for Science, Technology, Engineering and Mathematics careers engaged with the project*

- **Outcome B (page 50)** Highlight paragraph.

- **Output B.1 (page 51)**

Added text and highlighted in yellow: *From an inclusion perspective (Annex 10), actions under this Output include the Identification of gaps and causes of segregation in the workplace specifically aimed at large industries such as chemical and petrochemical corporations, industrial estates, large enterprises, and other stakeholders related to sites of environmental concern. The IMSRed project will also analyze the causes of the predominance of vulnerable groups in informal jobs by retrieving updated data and staff reports, specifically aimed at SMEs and recycling cooperatives included in pilot projects (Output B3) and in key industrial sectors, such as the petrochemical, textile, and paint (Output B.2)*

- **Output B.3 (page 55).**

Added text and highlighted in yellow: *Also, from this perspective, analyze the obstacles to acquiring technical skills and identifying training needs in recycling cooperatives and SMEs involved in pilot projects from Output B3 to reduce difficulties in accessing technical knowledge.*

? **D.1.i (page 64)**

Added text and highlighted in yellow: *Build a strategy directed to key industrial sectors such as the petrochemical, textile, and paint that promote best practices regarding the Gender Action Plan (Annex 10).*

? **D.1.ii (page 64)**

Added text and highlighted in yellow**:**

? *Build focused training based on the analysis of each facility to create spaces for reflection in different work environments, as per the Line of Action of Annex 10?.*

? *Design a specific technical training plan in accordance with the analysis and evaluating the results with the stakeholders involved to reduce difficulties in accessing technical knowledge, as per the Line of Action of Annex 10.*

<u>Stakeholder engagement</u>

R:/
Please refer to the highlighted texts in CEOER:

- Section The Project Approach - Component 1
- Section The Project Approach ? Activity A.4.i
- Section The Project Approach - Activity B.2.i Alternative #1
- Section The Project Approach - Activity B.2.i Alternative #2
- Section The Project Approach - Activity B.3.ii Alternative #1
- Section The Project Approach - Activity B.3.ii Alternative #2

Please refer to the highlighted text in ProDoc:
- Paragraph 91 y nota al pie de pagina (page 41)
- Activity A.4.1 (page 49)
- Activity B.2.i Alternative #1y y Alternative #2 - Relevant stakeholders (page 54)
- Activity B.3.ii Alternative #1 (page 57)
- Activity B.3.ii Alternative #2 (page 58)

Activity B.3.ii Alternative #3 (page 59)

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

There is not a justification of why UNDP should take on a execution role. Are there any additional funds going to UNDP for execution support?

Please state yes or no in the project document of the GEF agency will play an execution role.

ES, 5/7/25: Please comment in the section below if and how these comments have been addressed.

ES, 5/9/25. UNDP will not provide an execution role. Comment addressed.

Agency Response
04/04/2025
R:/
UNDP is not going to provide an execution role. Please, note the modality of implementation is NIM and it should be indicated in the GEF portal as ?No?, but the option does not appear, only YES option. See screenshot below. Please advise how to proceed in this case.

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 RequestRisks are included.

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 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 RequestYes, this project aligns with the GEF-8 CW programming directions.

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, this project is aligned with the Stockholm Convention and NIP and Minamata Convention.

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 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 Request

Stakeholder Engagement Plan is rather general and could provide more details on the different stakeholder?s roles and contributions to project components and outputs.

ES, 5/9/25: please provide a response to comments in the review sheet below.

ES, 7/2/25: Comment addressed

Agency Response

6/2/25 Response:

Please find the adjusted version of Annex 8 ? Stakeholder Engagement Plan (SEP). This adjusted SEP on page 21, Table 4, includes the "Activities" column with a detailed description of activities of the Plan aligned with the outputs and activities of the project. Additions have been incorporated in yellow for easy reference.

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 RequestNA

Agency Response
Focal Area allocation?

Secretariat comment at CEO Endorsement RequestYes, CW.

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 Request
On the status of utilization of PPG:

a. Please clarify the reason for having a ?National PPG Coordinator? when there was already an ?International Project Development Specialist? who --one can assume? is the expert responsible for the project design. A ?PPG Coordinator? is not an eligible category at a PPG phase.

b. Please bundle all National Experts (C&W, Lega, Gender, Stakeholder engagement) into one eligible category namely ?Consultancies?, but including all the consultants.

ES, 5/9/25: Please provide a response to comments below.

ES, 5/7/25: Please comment in the section below if and how these comments have been addressed.

ES, 7/2/25: Comment addressed.

Agency Response

6/2/25 Response:

a. The rationale for hiring a *PPG National Project Coordinator* is to ensure dedicated local coordination and technical oversight during the project preparation phase. This professional brings in-depth knowledge of the chemicals and waste sector at the national level, coordinates the team of national consultants across various areas of expertise, liaises with key project stakeholders, validates technical information, and compiles the required documentation. This comprehensive package will then be provided to the International Consultant, who is responsible for preparing the full Project Document, including annexes and the CEO Endorsement Request (CEO ER) for submission to the UNDP and the GEF.

b. The recommendation has been incorporated and is highlighted in yellow for easy reference into Annex D of the CEO Endorsement Request (CEO ER), under the sections *Status of Utilization of the Project Preparation Grant* and *Budget,* on page 92.

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 Request

Co-financing includes a good mix of sources.

The letter of cofinancing for the Minera Andina del Sol SRL amount of USD 11,600,000 is missing. The uploaded letter of support is not relevant.

ES, 5/7/25: Please comment in the section below if and how these comments have been addressed.

ES, 5/9/25: See comments above

ES, 7/2/25: Comment addressed.

Agency Response

6/3/25 Response:

Thanks for the comment. There was an error with the previous file. Please find attached the correct version of the cofinancing letter, titled *Cofinancing Letter Minera del Sol and translation to English.pdf*, along with its English translation.

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 RequestNA

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
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, core indicators are appropriate.

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 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

On the budget:

a. Please modify the Responsibly Entity content column from ?Vicejefatura de Gabinete del Interior? to ?Ministry of Environment and Sustainable Development (MAyDS)?, which is the Project Executing Entity identified in the General Project Information Table.

b. There are some positions that are presented in one budget line (see some examples below), which prevents us to assess the reasonability of each position to be charged to the project components ? M&E and PMC. Please ask the Agency to present each position in an individual budget line. Also, the budget systematically refers to the Annexes included in the ProDoc for further explanation: please note that in the Detailed Description column, the budget table must provide the succinct but clear explanation of what each budget line entails (please avoid long explanations). As is, we cannot provide an assessment of the budget, neither we can evaluate the TORs vis-?-vis the positions in budget. Per the resubmission, we will review the whole budget in detail and provide comments as appropriate.

ES, 5/7/25: Please comment in the section below if and how these comments have been addressed.

ES, 5/9/25: See comments above
ES, 7/2/25: Comment addressed.

Agency Response

6/2/25 Response:

a. As of December 2023, in Argentina the incoming administration restructured the National Public Administration through DNU 8/2023, which amended the National Law of Ministries. This restructuring was followed by subsequent decrees?Decree 644/2024 and Decree 654/2024 (both published in July 2024), Decree 764/2024 (published in August 2024), and Decree 1103/2024 (published on December 17, 2024).

As a result, the Ministry of Environment and Sustainable Development (MAyDS)?originally listed as the Project?s Implementing Partner in the PIF submitted in December 2023?was dissolved. The highest environmental authority is now the Undersecretariat of Environment (SSA), whose scope of responsibilities and functions has been revised. The SSA currently reports to the Secretariat of Tourism, Environment and Sports (STAyD), which, in turn, falls under the authority of the Vice-Chief of the Cabinet of Ministers of the Interior of the Nation (VJI-JGM). Based on the previous, this new institutional arrangement is considered and the

VJI-JGM has been designated as the responsible entity for project implementation, as the Project will now operate within its jurisdiction.

It is important to note that this institutional change was anticipated during the PPG phase.

On the other hand, in the General Information Table of the CEOER, the Vice Chief of Interior Cabinet is identified as the Executing Entity of the Project, as indicated on page 02 highlighted in yellow for easy reference.

b. Thanks for your comments. Positions are presented as requested, in one budget line in CEO ER Annex G Budget Table and in Annex 1 of the prodoc. On the other hand, budget lines were corrected to be succinct as requested (see CEO ER Annex G ? detailed description column, as well as in the budget notes in the prodoc section X).

For easy assessment of the budget vis-?-vis the ToRs, Annex 7 Overview of Technical Consultancies/Subcontracts of the Prodoc have been adjusted with changes highlighted in yellow.

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. Some issues remain.

ES, 7/10/25: One comment on co-financing remains.

ES, 7/15/25: Comments addressed. The project is 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

	CEO Approval	Response to Secretariat comments
First Review	**3/27/2025**	
Additional Review (as necessary)	**5/7/2025**	
Additional Review (as necessary)	**7/2/2025**	
Additional Review (as necessary)	**7/10/2025**	
Additional Review (as necessary)	**7/15/2025**	