

## REVISED STAP SCREENING TEMPLATE, OCTOBER 2022

GEF ID	11451
Project title	Integrated Management for Sustainable Reduction (IMSRed) of POPs, Highly Hazardous Pesticides, and industrial chemicals in Argentina
Date of screen	24 January 2024
STAP Panel Member	Miriam Diamond
STAP Secretariat	Sunday Leonard

### 1. Summary of STAP's views of the project

This project is motivated by Argentina's commitments to comply with the Stockholm and Minamata Conventions. The sectors named in the proposal are extremely broad, ranging from agriculture (use of highly hazardous pesticides) to mining (e.g., gold mining using mercury as an amalgam) and waste electronic and electrical goods or e-waste. The project aims to address uPOPs from open burning of waste, POPs that are present in imported finished goods (e.g., PFOS, PBDEs), POPs in e-waste (e.g., PBDEs), highly hazardous pesticides, and mercury including stocks from dental amalgams, thermometers, etc. The actions needed include strengthening capacity for enforcement and coordination between different levels of government, better inventory stockpiles of hazardous chemicals, including pesticides, and building a stronger monitoring program.

The project is spread across many sectors but lacks clear and logical plans to address POPs and mercury emissions along any one of them. Each sector holds great challenges, including prioritization of activities, financing, and stakeholder buy-in. However, these aspects are not adequately considered for any of the sectors. The proposal needs to illustrate the logic linking activities and outputs to the ultimate goal, as the Theory of Change is lacking here. Although the proposal noted that many chemicals already banned elsewhere are still being used in the country, indicating the need for appropriate legislative instruments and enforcement, it does not clearly show how the project will address this. Since most of the project seems to focus on data collection and the capacity and facilities to enable this, it is difficult to see how the estimated GEBs will be achieved.

While the broadness of the project is not a major issue, as it is possible to address chemicals and waste concerns across different sectors in the same project by building on common elements to achieve efficiencies, the proponent has not provided the needed details on what the issues are in each targeted sector, how they will be addressed and what will be done to ensure durable outcomes. The overall logic of how the project will achieve its goals is unclear, and therefore, the project document requires significant revision.

STAP has communicated its concerns with the GEF Secretariat. Efforts are being made to address the concerns and will continue as the project is developed further at the PPG phase. STAP is available to engage on improving the project design as needed.

*Note to STAP screeners: a summary of STAP's view of the project (not of the project itself), covering both strengths and weaknesses.*

#### STAP's assessment\*

- Concur - STAP acknowledges that the concept has scientific and technical merit
- Minor - STAP has identified some scientific and technical points to be addressed in project design
- Major - STAP has identified significant concerns to be addressed in project design**

Please contact the STAP Secretariat if you would like to discuss.

### 2. Project rationale, and project description – are they sound?

See annex on STAP's screening guidelines.

1. **Systems thinking.** The project proposal identifies multiple needs to deal with POPs and mercury in waste streams and stockpiles. Although the project is focused on POPs and mercury, the proposal addresses multiple systems across multiple sectors. Unfortunately, the proposal does not explain these multiple systems well, perhaps because there are many, and each system is complex. Each system, such as agriculture, industrial production – chlor-alkali, e-waste, and mining (the proposal also mentioned textile, plastics, and construction),

has its own sets of drivers, barriers, and enablers which are not adequately described. For example, how will drivers such as increasing volumes of e-waste containing less PBDEs (because of their restricted status) be dealt with? How will the illegal trade of mercury to the artisanal mining sector be dealt with? What enablers need to be in place to sustainably finance disposal and destruction systems? What are the political, sociocultural, economic, and demographic factors, including their interlinkages affecting chemical management in the different sectors? Overall, a systems thinking perspective is missing in the project rationale.

2. **Uncertain futures** were not discussed but could be useful when considering measures to mitigate possible outcomes should drivers change and assumptions not hold up. For example, how could the drivers of chemical pollution unfold in the future, and how could these possible changes influence the ability to achieve project objectives? The proponent needs to develop 2-3 narratives of plausible futures for each targeted sector. This can then inform the type of interventions that should be developed that will be robust to the different plausible futures. Please consult STAP's brief on [Future Narratives](#).

3. **Baseline, barriers, and enablers.** The baseline situation is across many sectors, including textiles, agriculture, construction, plastics, and mining, but with insufficient detail to understand the magnitude of each problem (e.g., POPs vs. mercury emissions), which sectors are the greatest contributors, and which activities should be prioritized. The introduction states that many small and medium-sized enterprises use or release POPs without details on which sectors or which POPs are responsible. Several laws are in place, but the extent of enforcement is not explained. Barriers and enabling elements are not sufficiently described, especially in the context of how project activities and outputs will address them.

4. The **Theory of Change** (ToC) diagram contains immediate causes and project components, each of which has several outputs intended to lead to achieving the goal, but it doesn't present a clear logic of how the interventions would lead to achieving the goals. It is more of a copy and paste of the project components and output in its current form without a logical flow.

- Probably a different theory of change is needed for each sector that the project is targeting or a theory of change that convincingly ties all the sectors together
- The current theory of change is missing a narrative of how the different items come together to achieve desired impacts.
- It is also missing assumptions. The assumptions underlying the pathways to achieving project goals need to be identified and included in the theory of change.
- Drivers need to be considered, such as changes in demand for gold, changes in e-waste generation, etc.
- The ToC needs to improve the logic linking the various elements of each pathway. For example, linkages between activities, such as strengthening monitoring and analytical capacity with outcomes and goals, need to be made.
- The barrier of time lags needs to be considered. An example here is conducting a risk assessment to identify and prioritize sites of "environmental concern" based on POP emissions, which could be very time-consuming, but then mitigative measures to deal with these sites are not explained.

#### 5. The **project components**

The project consists of 5 components with many activities, which, as noted above, could benefit from more information on activities, prioritization, and better integration.

- Component 1 addresses institutional strengthening, enabling environment, and access to finance for sound management of chemicals, but activities include implementing a monitoring system for POPs, uPOPs and mercury and expanding lab capacity for monitoring, conducting ecotoxicological risk assessment, establishing a standard certification system and guideline levels. Consideration will be given to EPR without further details provided. Sustainable financing is also mentioned, but again, there are no details on how this would be encouraged or even the relevant actors to enable this. Although the proposal noted that many chemicals already banned elsewhere are still being used in the country, indicating the need for appropriate legislative instruments and, importantly, enforcement, Component 1 (or other components) does not clearly show whether (or how) the project will address this. The interministerial roundtable aims to encourage the generation of new management tools but should also

be an excellent opportunity to address policy coherence to ensure that there are no antagonistic policies that can derail the goal of the project.

- Component 2 lists implementing pilot projects for introducing BAT/BEP for industrial POPs, “new” POPs, and chemicals of global concern. Details are needed regarding what types of pilot activities will be introduced and into which sectors. Four pilot projects will aim for environmentally sound management (ESM) of POPs-containing waste, particularly those containing brominated flame retardants (only PBDEs are listed under the Stockholm Convention, not other current use brominated flame retardants), but an explanation of what ESM entails is needed. Information on e-waste collection is not given, so judging the feasibility of managing PBDEs in e-waste is difficult. Details are also required for the activity of strengthening the circular economy in the informal sector that handles e-waste.
- Component 3 is building cost-effective options for environmentally sound management (ESM) of POPs and highly hazardous wastes, as well as disposal of mercury waste. The proposal needs to include more information to evaluate the feasibility of “effective and correct” disposal of mercury from the mining industry, including the availability of infrastructure to dispose of mercury safely.
- Also on Components 2 and 3, the interventions mainly focus on waste management. There is a need to consider what could be done upstream to reduce the need for waste management in the future.
- Component 4 is establishing a knowledge management (KM) system and communication platform. The proposal needs more details on who will be trained and who will conduct this training. How will a Gender Action Plan be developed?
- Although the proposal mentions monitoring, no details are provided on what will be monitored and what metrics will be used.

6. **Stakeholders** and their concerns are listed, but not whether they have been consulted.

7. The estimation of **GEBs** needs to be better explained, e.g., what is the assumption of e-waste recovery and then PBDE recovery from those wastes? Similarly, details are lacking on e-waste subject to open burning from which PCDD/Fs are produced and how open burning of e-waste will be avoided. The estimate of CO<sub>2</sub> GEBs also needs clarity, including the source of data and assumptions used in the calculation. No details are offered on the calculation of the number of beneficiaries.

8. The lack of **policy coherence** is a barrier, but measures to overcome this are not explained. For example, as noted earlier, Component 1 addresses the need to strengthen policy coherence with an activity to strengthen the implementation of the interministerial round table, which apparently already exists. How will this roundtable be strengthened, and how will this lead to greater policy coherence, e.g., will there be an analysis of existing legislation and where they are in conflict?

9. **Risks**. Several risks are identified, but mitigative measures are not offered.

*Note: provide a general appraisal, asking whether relevant screening guideline questions have been addressed adequately – not all the questions will be relevant to all proposals; no need to comment on every question, only those needing more attention, noting any done very well, but ensure that all are considered. Comments should be helpful, evaluative, and qualitative, rather than yes/no.*

### 3. Specific points to be addressed, and suggestions

The project requires significant revision to make it compelling and viable. STAP recommends that the project proponents address all of the comments in section 2 above, including the following:

- Develop a system thinking-based narrative of the problems in each targeted sector and provide a clear understanding of the issues and their interactions to inform the suitable set of interventions.
- As a sequel to the above, develop a narrative of plausible futures given uncertainties and assumptions as described in Section 2 above. See STAP's [primer on future narratives](#) for more guidance.
- Revise the theory of change to explicitly show how the interventions will address identified barriers and lead to desired outcomes as well as the underlying assumption for the pathways to achieving the project goals. Provide both a narrative and diagrammatic representation of the theory of change

- Provide details of the project components and the logic behind them. See Section 2 above. Specifically, given that the project is targeting several sectors, design the project components to highlight interventions that are applicable across sectors and those that will be specific to each different sector. Also, explain how the outputs from each intervention will lead to desired outcomes and ultimate impact.
- Give greater consideration to how the project will achieve policy coherence. See the relevant bullet point in Section 2 above
- Provide information on the estimate of GEBs, including the baseline data and assumptions used in the calculation.

*Note: number key points clearly and provide useful information or suggestions, including key literature where relevant. Completed screens should be no more than two or three pages in length.*

\*categories under review, subject to future revision

## ANNEX: STAP'S SCREENING GUIDELINES

1. How well does the proposal explain the problem and issues to be addressed in the context of the **system** within which the problem sits and its drivers (e.g. population growth, economic development, climate change, sociocultural and political factors, and technological changes), including how the various components of the system interact?
2. Does the project indicate how **uncertain futures** could unfold (e.g. using simple **narratives**), based on an understanding of the trends and interactions between the key elements of the system and its drivers?
3. Does the project describe the **baseline** problem and how it may evolve in the future in the absence of the project; and then identify the outcomes that the project seeks to achieve, how these outcomes will change the baseline, and what the key **barriers** and **enablers** are to achieving those outcomes?
4. Are the project's **objectives** well formulated and justified in relation to this system context? Is there a convincing explanation as to **why this particular project** has been selected in preference to other options, in the light of how the future may unfold?
5. How well does the **theory of change** provide an "explicit account of how and why the proposed interventions would achieve their intended outcomes and goal, based on outlining a set of key causal pathways arising from the activities and outputs of the interventions and the assumptions underlying these causal connections".
  - Does the project logic show how the project would ensure that expected outcomes are **enduring** and resilient to possible future changes identified in question 2 above, and to the effects of any conflicting policies (see question 9 below).
  - Is the theory of change grounded on a solid scientific foundation, and is it aligned with current scientific knowledge?
  - Does it explicitly consider how any necessary **institutional and behavioral** changes are to be achieved?
  - Does the theory of change diagram convincingly show the overall project logic, including causal pathways and outcomes?
6. Are the project **components** (interventions and activities) identified in the theory of change each described in sufficient detail to discern the main thrust and basis (including scientific) of the proposed solutions, how they address the problem, their justification as a robust solution, and the critical assumptions and risks to achieving them?
7. How likely is the project to generate global environmental benefits which would not have accrued without the GEF project (**additionality**)?
8. Does the project convincingly identify the relevant **stakeholders**, and their anticipated roles and responsibilities? is there an adequate explanation of how stakeholders will contribute to the development and implementation of the project, and how they will benefit from the project to ensure enduring global environmental benefits, e.g. through co-benefits?

9. Does the description adequately explain:

- how the project will build on prior investments and complement current investments, both GEF and non-GEF,
- how the project incorporates **lessons learned** from previous projects in the country and region, and more widely from projects addressing similar issues elsewhere; and
- how country policies that are contradictory to the intended outcomes of the project (identified in section C) will be addressed (**policy coherence**)?

10. How adequate is the project's approach to generating, managing and exchanging **knowledge**, and how will lessons learned be captured for adaptive management and for the benefit of future projects?

**11. Innovation and transformation:**

- If the project is intended to be **innovative**: to what degree is it innovative, how will this ambition be achieved, how will barriers and enablers be addressed, and how might scaling be achieved?
- If the project is intended to be **transformative**: how well do the project's objectives contribute to transformative change, and are they sufficient to contribute to enduring, transformational change at a sufficient scale to deliver a step improvement in one or more GEBs? Is the proposed logic to achieve the goal credible, addressing necessary changes in institutions, social or cultural norms? Are barriers and enablers to scaling be addressed? And how will enduring scaling be achieved?

12. Have **risks** to the project design and implementation been identified appropriately in the risk table in section B, and have suitable mitigation measures been incorporated? (NB: risks to the durability of project outcomes from future changes in drivers should have been reflected in the theory of change and in project design, not in this table.)