

Supporting a Green Economy - Decoupling Hazardous Waste Generation from Economic Growth in Rwanda

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10373

Countries

Rwanda

Project Name

Supporting a Green Economy - Decoupling Hazardous Waste Generation from
Economic Growth in Rwanda

Agencies

UNDP

Date received by PM

6/1/2021

Review completed by PM

10/12/2021

Program Manager

Ibrahima Sow

Focal Area

Chemicals and Waste

Project Type

FSP

PIF □
CEO Endorsement □

Part I ? Project Information

Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

7 June 2021: The project remains aligned with the PIF. Minor changes on disposal operations related to PCB, obsolete pesticides and PBDE and related costs are noted but well justified in the CEO endorsement document.

Agency Response

Project description summary

2. Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

Secretariat Comment at CEO Endorsement Request

7 June 2021: Please note that:

1. The project needs a theory of change
2. The GEF does not finance contaminated soil. Please provide a clear justification for this if it is to be considered. Additionally, while the use of cement kilns is an option for POPs disposal, it certainly would not be appropriate for soil and the GEF has been discouraging the use of kilns for hazardous waste due to the liability it poses. UNDP also should have

extensive knowledge of soil remediation options as they have had pilot projects that looked at contaminated soil in Asia and Central Asia, however there is no evidence in the project that they are applying this knowledge

3. The proposal is vague on the EPR and how it will be set up. Some clarification on this would be needed.

Agency Response

1. The theory of change has been added to the Section 2.3) The proposed alternative scenario with a brief description of expected outcomes and components of the project?. It is drawn from the UNDP Project document as drafted (page 13).

2. The inclusion of GEF financing for treatment of PCB-contaminated soil at the Gikondo Industrial Park transformer site based on the PIF, which includes the output "One (1) PCB contaminated site remediated (e.g. transformer maintenance site)". The PCB-related activities of the project focus on the phase-out/disposal of the remaining PCB-containing equipment in the country (122 MT), which has been inventoried and, in some cases, stockpiled. Since development of the PIF, the transformer maintenance site has been closed and relocated to more environmentally sound facilities, however, suspected PCB-contaminated soil remains. Based on an initial assessment of the situation including past practices at the site, soil properties, and area of likely impact, 250 MT of PCB-contaminated soil has been estimated.

The planned activities for the treatment of the PCB-contaminated soil are to: test the soil to determine the level of contamination and finalize the determination of the amount of soil to be treated; develop a contaminated site remediation plan; undertake a tender for service, with an international service provider, which includes the export of the excavated contaminated soil for treatment at an appropriate facility; and further implement the remediation plan with the potential for testing and applying innovative bioremediation measures (e.g. addressing lower-contaminated soil). This will include providing guidance and training to relevant stakeholders, such as REG and waste management enterprises, on all steps, from contaminated site analysis to remediation including excavation, collection, handling, repacking, transportation, cleaning, residual contamination, treatment, storage, and export.

This project activity will also be coordinated with the Government's broader initiative to vacate all business activities from the Gikondo Industrial Park by Q4 2021 and initiate restoration and conservation of the wetlands, in which the Industrial Park is located, with the support of the World Bank Rwanda Urban Development Project II (GEF Project ID: 10530). This includes wetland management and restoration that will safeguard carbon stocks and increase sequestration, which will comprise rehabilitation, maintenance, monitoring, and the implementation of nature-based interventions. This project will make an important contribution to the wetlands restoration activities by removing the hazards of PCB-contaminated soil from the wetlands, which would not be covered by the World Bank project.

Knowledge of soil remediation options developed in other UNDP projects will be applied to this project. This includes the following projects: POPs Legacy Elimination and POPs Release Reduction Project in Turkey (GEF Project ID: 4601); Disposal of POPs Pesticides and Initial Steps for Containment of Dumped POPs Pesticides in Georgia (GEF Project ID: 4012); and Environmental Remediation of Dioxin Contaminated Hotspots in Vietnam (GEF Project ID: 3032). Lessons learned to be shared with this project will address: site assessment and risk assessment; remediation technologies such as, possibly, mechano-chemical destruction, thermal desorption, and biodegradation technology; national contaminated site registration and information system; development of standards; interim storage; and training.

Lessons learned from the testing and application of innovative bioremediation measures in areas with lower levels of POPs and pesticides contamination will also provide important inputs to the development of future interventions in Rwanda and other countries.

The project will use GEF support only for the disposal of the PCB-contaminated soil. GEF support will not cover the cost of disposal of the pesticide-contaminated soil (these costs of 350,000 USD have been removed from the budget and applied to other project activities including preparatory tasks for the site remediation (such as training on contaminated site remediation, testing and application of innovative bioremediation measures, and preparation of financing plan to support identification of domestic or international/bilateral resources for the disposal of contaminated soil)) and strengthening of national laboratory capacity. Instead, only soil testing and developing contaminated site remediation plans for the two pesticide-contaminated sites will remain covered by the project.

This will be coordinated with strengthening the legal framework, including addressing contaminated sites, and will feed into future remediation efforts and replication, with potential funding by the national or municipal governments, to minimize environmental and health impacts from POPs and other hazardous chemicals after the project.

3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Co-financing

4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat Comment at CEO Endorsement Request 7 June 2021: Breakdown of cofinancing identified and investments mobilized described and documented

Agency Response

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request

Financing presented in table D appears adequate.

However, in the project budget table presented in Annex E, there are costs associated with purchase of equipment such as XRF machines to monitor mercury. How will they cover the cost of servicing, replacement parts, etc... in the long term? Another option to explore could be to have a lease agreement for the provision of the devices.

Agency Response

The request for proposals for the purchase of equipment, such as XRF machines to monitor mercury will include after-service for the duration of the project. Charging a fee to importers of products that require mercury analysis will also be considered under the project to generate funds for future service of equipment beyond the life of the project. Leasing agreements for the equipment will also be explored and subject to a cost-benefit analysis to determine the best approach

Project Preparation Grant

6. Is the status and utilization of the PPG reported in Annex C in the document?

Secretariat Comment at CEO Endorsement Request Yes

Agency Response

Core indicators

**7. Are there changes/adjustments made in the core indicator targets indicated in Table E?
Do they remain realistic?**

Secretariat Comment at CEO Endorsement Request

7 June 2021: Please provide information on how the core indicators have been calculated. This is particularly important as it seems the GEB's from this project stem mainly from contaminated soil. Volumes of contaminated material should be reported in sub-indicator 9.6. Sub-indicator 9.1 is only for estimated tons of pure chemicals.

27 July 2021: Please ensure that the Core Indicators used in this project are also reflected in Table B and the Theory of Change to ensure consistency and demonstrate that these indicators are rooted in the logic of intervention. I noticed that these indicators are already referred to in the project results framework, though de-linked from the rest of the components.

Agency Response

13 Aug 2021: The Core Indicators are now reflected in Table B and the Theory of Change to ensure consistency and demonstrate that these indicators are rooted in the logic of intervention.

June 2021:

Sub-indicator 9.1 includes:

- 122 MT of PCBs (oil and contaminated equipment)
- 35 MT of PBDEs (from PBDE-contaminated e-waste plastic)
- 3 MT of Lindane and Endosulfan (from existing, primarily buried stockpiles)
- 44 MT of HHPs (from existing, primarily buried stockpiles)

- 1 MT of Hg (from healthcare waste and e-waste)

These are estimates of pure chemicals.

Sub-indicator 9.6 includes:

- 35,000 MT of POPs-contaminated plastic from e-waste
- 40 MT of plastic and other materials from Hg-containing healthcare waste and e-waste

- 250 MT of PCB-contaminated soil from the main transformer maintenance site

The 250 MT of PCB-contaminated soil represents a small percentage of the total GEBs, which is 205 MT and 35,290 M sub-indicators 9.1 and 9.6 respectively.

Part II ? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?

Secretariat Comment at CEO Endorsement Request

7 June 2021: Please elaborate on the potential synergies and complementarity between this project with the World Bank Rwanda Urban Development Project II under the GEF-7 Sustainable Cities Impact Program.

Agency Response

This project will be coordinated with the relevant activities under the World Bank Rwanda Urban Development Project, particularly its development of a National Integrated Waste Management Strategy, and within that an assessment of the financial sustainability of Rwanda's solid waste management operations and infrastructure, and the development of a Community Awareness Campaign and Separation-at-Source Pilot Initiative. Linkages will be ensured with this project's activities on the development of a web-based hazardous waste inventory and database; avoiding/reducing the generation (hazardous) waste and releases through the introduction of cleaner production practices and safer alternatives; assessment and initiation of pilots for valorization of priority waste streams; and enhancement of the environmental performance of existing waste treatment facilities, national treatment capacity for hazardous waste, and hazardous waste interim storage facilities.

The assessment of the financial sustainability of Rwanda's solid waste management operations and infrastructure will especially inform waste valorization efforts and the development of an EPR under this project.

The Community Awareness Campaign and Separation-at-Source Pilot Initiative can also contribute to improved collection of plastics and e-waste, among other recyclables, to be addressed by participating private sector enterprises under this project and increase the financial sustainability of their operations.

5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?

Secretariat Comment at CEO Endorsement Request

7 June 2021: Yes, in particular from GEF previous activities, Government and contributions from Private partners relating to waste management best practices.

Agency Response

6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

Yes.

Agency Response

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request

7 June 2021: The project is innovative as it will explore local and disposal treatment and develop consequently sustainable capacity for environmental sound management of chemicals and waste. Rwanda is one of the few countries where an e-waste facility has been established through a PPP. It appears that the facility is in conformity with international standards.

However, I would ask the UNDP to elaborate on how the facility could be used to treat the e-waste streams from neighbouring countries.

Agency Response

Enviroserve imported e-waste from DRC and Uganda prior to the COVID-19 pandemic. This was undertaken in compliance with the Basel Convention control system for the transboundary movement of hazardous wastes and other wastes. At the national level, the import of e-waste is approved by the Ministry of Environment (through a letter). National import permit regulations regarding e-waste do not yet exist, but will be addressed under the project.

Enviroserve plans to resume importing of e-waste from DRC and Uganda and expand to other countries in the region for treatment in an environmentally sound manner, including repairing, refurbishing, and recycling.

Enviroserve has also hosted delegations from several countries in Africa to share its experience and lessons learned for managing e-waste and will resume this in the future subject to COVID-19 pandemic restrictions.

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Child Project

If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?

Secretariat Comment at CEO Endorsement Request

NA

Agency Response

Stakeholders

**Does the project include detailed report on stakeholders engaged during the design phase?
Is there an adequate stakeholder engagement plan or equivalent documentation for the
implementation phase, with information on Stakeholders who will be engaged, the means of
engagement, and dissemination of information?**

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Gender Equality and Women's Empowerment

**Has the gender analysis been completed? Did the gender analysis identify any gender
differences, gaps or opportunities linked to project/program objectives and activities? If so,
does the project/program include gender-responsive activities, gender-sensitive indicators
and expected results?**

Secretariat Comment at CEO Endorsement Request

Gender analysis adequately completed

Agency Response

Private Sector Engagement

**If there is a private sector engagement, is there an elaboration of its role as a financier
and/or as a stakeholder?**

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request

7 June 2021: Main risks have been identified for the project, as well as the key risk management measures

that will be required to mitigate the identified risks throughout the project.

Agency Response

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request

The GEF has financed two large projects (one being implemented by UNDP) to tackle mercury containing medical devices so this project should cooperate with those to ensure coherence.

Agency Response

Consistency with National Priorities

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

Secretariat Comment at CEO Endorsement Request

Yes.

Agency Response

Knowledge Management

Is the proposed Knowledge Management Approach for the project adequately elaborated with a timeline and a set of deliverables?

Secretariat Comment at CEO Endorsement Request

27 July 2021: KM is missing two key elements:

- Plans for a strategic communications plan/strategy
 - A dedicated KM budget and a time-line for implementing the activities/products/platforms, etc. proposed as part of the KM approach.
- Please provide these missing elements before CEO approval.

Agency Response 13 Aug 2021: Plans for a Communications Strategy and KM deliverables, timeline, and budget have been added to Section 8 (Knowledge Management).

Environmental and Social Safeguard (ESS)

Are environmental and social risks, impacts and management measures adequately documented at this stage and consistent with requirements set out in SD/PL/03?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request

27 July 2021

- Please either specify Miscellaneous expenses or remove them from GEF funding:

Expenditure Category	Detailed Description	Component (\$/Req.)							Total (\$/Req.)	Responsible Entity (Sponsoring Entity include)
		Component 1	Component 2	Component 3	Component 4	Sub-Total	M&E	PMC		
Other Operating Costs	Printing and publications costs in support of Component 1 activities (6,000 USD/year + 20,000 USD)	26,000				26,000			26,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 1 activities (7,500 USD/year + 37,500 USD)	37,500				37,500			37,500	RENA
Other Operating Costs	Audio-visual & print production costs related to trainings conducted as part of Component 1 (25,000 USD)		25,000			25,000			25,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 2 activities (7,500 USD/year + 37,500 USD)		37,500			37,500			37,500	RENA
Other Operating Costs	Audio-visual & print production costs related to trainings conducted as part of Component 2 (25,000 USD)			25,000		25,000			25,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 3 activities (7,500 USD/year + 37,500 USD)			37,500		37,500			37,500	RENA
Other Operating Costs	Audio-visual & print production expenses for NCA, ESA, and ERMP (1,000 USD) for awareness raising and communication (61,000 USD)				61,000	61,000			61,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 4 activities (7,500 USD/year + 37,500 USD)				37,500	37,500			37,500	RENA
Other Operating Costs	Audit at 4,500 USD/year for the 3 years (13,500 USD)							13,500	13,500	RENA
Other Operating Costs	Miscellaneous expenses for PMC activities (2,000 USD/year + 20,000 USD)							20,000	20,000	RENA
Grand Total		515,200	1,434,100	1,609,625	443,675	6,900,000	-	300,000	6,900,000	

Expenditure Category	Detailed Description	Component (\$/Req.)							Total (\$/Req.)	Responsible Entity (Sponsoring Entity include)
		Component 1	Component 2	Component 3	Component 4	Sub-Total	M&E	PMC		
Other Operating Costs	Printing and publications costs in support of Component 1 activities (6,000 USD/year + 20,000 USD)	26,000				26,000			26,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 1 activities (7,500 USD/year + 37,500 USD)	37,500				37,500			37,500	RENA
Other Operating Costs	Audio-visual & print production costs related to trainings conducted as part of Component 1 (25,000 USD)		25,000			25,000			25,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 2 activities (7,500 USD/year + 37,500 USD)		37,500			37,500			37,500	RENA
Other Operating Costs	Audio-visual & print production costs related to trainings conducted as part of Component 2 (25,000 USD)			25,000		25,000			25,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 3 activities (7,500 USD/year + 37,500 USD)			37,500		37,500			37,500	RENA
Other Operating Costs	Audio-visual & print production expenses for NCA, ESA, and ERMP (1,000 USD) for awareness raising and communication (61,000 USD)				61,000	61,000			61,000	RENA
Other Operating Costs	Miscellaneous expenses for Component 4 activities (7,500 USD/year + 37,500 USD)				37,500	37,500			37,500	RENA
Other Operating Costs	Audit at 4,500 USD/year for the 3 years (13,500 USD)							13,500	13,500	RENA
Other Operating Costs	Miscellaneous expenses for PMC activities (2,000 USD/year + 20,000 USD)							20,000	20,000	RENA
Grand Total		515,200	1,434,100	1,609,625	443,675	6,900,000	-	300,000	6,900,000	

•Please include M&E budget under M&E column.

Agency Response

13 Aug 2021: These Miscellaneous expenses (budget line 29) will be used to deliver ?Outcome 6: Awareness raised on the sound management of POPs, Hg, and related wastes? and may include additional personnel costs (e.g. communications experts, graphic designers), publication of materials, travel of personnel or other participants, and outreach and communication costs.

M&E budget is uploaded under M&E column.

Benefits

Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request

Yes.

Agency Response

Project Results Framework

Secretariat Comment at CEO Endorsement Request Yes.

Agency Response

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request

Agency Response

Council comments

Secretariat Comment at CEO Endorsement Request

Agency Response

STAP comments

Secretariat Comment at CEO Endorsement Request

Agency Response
Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request

Agency Response
Other Agencies comments

Secretariat Comment at CEO Endorsement Request

Agency Response
CSOs comments

Secretariat Comment at CEO Endorsement Request

Agency Response
Status of PPG utilization

Secretariat Comment at CEO Endorsement Request

Agency Response
Project maps and coordinates

Secretariat Comment at CEO Endorsement Request

Agency Response
Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)

Secretariat Comment at CEO Endorsement Request
Agency Response

Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)

Secretariat Comment at CEO Endorsement Request

Agency Response

Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)

Secretariat Comment at CEO Endorsement Request

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is CEO endorsement recommended? (applies only to projects and child projects)

Secretariat Comment at CEO Endorsement Request

7 June 2021: Not yet. Please address GEFSEC comments

30 August 2021: Not yet - Please address the following comments

1. The project objective is long and includes elements that the project will not be measuring as per the indicators listed in the results framework, including "create jobs and protect human health and the environment". In this regard, we suggest shortening and rephrasing the objective to make sure it is indeed clear, specific and measurable, as per the Evaluation Policy requirement: "The objectives and intended results of GEF-financed activities should be specific and measurable, so as to make it possible to monitor and evaluate the project and program effectively."

Suggestion: "The project aims to support the Government of Rwanda and its private and public sector in decoupling hazardous waste generation and harmful releases from economic growth by enhancing the introduction of the 4R approach (Reuse, Reduce, Recycle and Recovery) in priority industries and economic sectors, while at the same time enhancing private sector led national waste treatment capacity to ensure the sound management of wastes, generate income, create jobs and protect human health and the environment."

2. Comment 3 on budget: not addressed. Miscellaneous expenses remained unexplained. Also the figures don't correctly fit within the different budget lines.

3. On M&E, while a column was included, no single activity from the M&E plan was considered in the budget or charged to the M&E source. Therefore, the budget needs to be adjusted to reflect this. Please amend and be reminded that per Guidelines, the budget in Portal has to be the same as the budget included in ProDoc and in the Documents tab.

22 Septembre 2021 : Comments on Miscellaneous and M&E allocations in the budget still not addressed.

•On miscellaneous: the explanation provided by the Agency on the items included in Miscellaneous is *?printing of materials, translation, office supplies, travel of project personnel or other participants, outreach and communication costs, and additional personnel costs as needed?* ? *printing of materials, translation, office supplies* are allowed as they can be considered miscellaneous. However *travel of project personnel or other participants, outreach and communication costs, and additional personnel costs as needed* are not eligible under this category. The reason for that is because *?travel?* is by itself a solely budget category, as well as *?outreach and communication costs?*. Regarding *?additional personnel costs as needed?*, this cannot be accepted: personnel costs have to be clearly estimated and budgeted under the respective categories (i.e. project staff, consultants). Additionally, this category *?miscellaneous?* has been charged to both *?the project?s components and PMC?*: eligible operational costs related with the project?s execution (*printing of materials, translation, office supplies*) can be charged to PMC, not to the components. Once the ineligible items (*travel of project personnel or other participants, outreach and communication costs, and additional personnel costs as needed*) are removed and allocated to the correct budget lines, the resubmission must include only one budget line with a reasonable amount charged to PMC.

•M&E allocations: some of the personnel charged to this source are either not eligible or do not match the M&E plan. Please see below:

•Intl Health Care Waste Management Expert (5 days*700 USD/day = 3,500 USD) ? not eligible under M&E ? not included in M&E Plan ? please remove from here and include in the right place (i. e. one of the project components)

•MTR & TE International Consultant (MTR = 30,000 USD; TE = 30,000 USD) ? eligible under M&E *and* included in M&E Plan, so this is OK

•International Gender Expert (30 days*700 USD/day = 21,000 USD) ? eligible under M&E *and* included in M&E Plan, *but* in M&E this is budgeted for \$20,000 ? please amend in budget

•International Safeguards Expert (20 days*700 USD/day = 14,000 USD) ? may be eligible under M&E *but* it is not included in M&E Plan ? please remove from here and include in the right place (i. e. one of the project components)

•There are three budget lines charged to one project component *and* to PMC as follows:

•Component 4 (for \$49,500 + \$54,900 + \$31,875) *and* to M&E (for \$10,500 + \$6,100 + \$5,625). However, none of the items included in these budget lines match either the M&E Plan or the allocation of \$10,500 + \$6,100 + \$5,625 (see screenshot below) ? consistency among budget lines, items and sources is required.

Local Consultants	National Gender Expert (100 days*300 USD/day = 30,000 USD); National Monitoring and Evaluation and Safeguards Officer (60 months*25k*1000 USD/month = 15,000); National Communications and Stakeholder Engagement Consultant (60 months*25k*1000 USD/month = 15,000)				00	49,500	49,500	10,500		00	60,000	REMA
Other Operating Costs	Audio-visual & print production expenses for SESA, ESIA, and ES/VP (1,000 USD); for awareness raising and communication (60,000 USD)				00	54,900	54,900	8,100		00	61,000	REMA



Other Operating Costs	Miscellaneous expenses for Component 4 activities: printing of materials, translation, office supplies, travel of project personnel or other participants, outreach and communication costs, and additional personnel costs as needed (7,500 USD/year = 37,500 USD)				75	31,875	31,875	5,625		00	37,500	REMA
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•The totals for M&E in budget in Annex E (\$97,381) do not match the total for the M&E Plan in Section 9 (\$115,000) ? see screenshots below. Please amend.

•In Annex ANNEX E: Project Budget Table

Please attach a project budget table.

Expenditure Category	Detailed Description	Component (USDeq.)							Total (USD eq.)	Responsible Entity (Executing Entity receiving funds from the GEF Agency)(1)
		Component 1	Component 2	Component 3	Component 4	Sub-Total	M&E	PMC		
Grand Total		515,200	1,174,100	3,866,825	346,494	5,902,619	97,381	300,000	6,300,000	

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- M&E Plan:

Monitoring and Evaluation Plan and Budget:		
GEF M&E requirements	Indicative costs (US\$)	Time frame
Inception Workshop	5,000	Within 60 days of CEO endorsement of this project.
Inception Report	None	Within 90 days of CEO endorsement of this project.
M&E of GEF core indicators and project results framework	20,000	Annually and at mid-point and closure.
GEF Project Implementation Report (PIR)	10,000	Annually typically between June-August
Monitoring of Gender Action Plan	20,000	On-going.
Supervision missions	None	Annually
Independent Midterm Review	30,000	36 months from CEO Endorsement date
Independent Terminal Evaluation (TE)	30,000	Two months prior to project closure
TOTAL indicative COST	115,000	

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- The budget table included in Annex E in Portal is off the margins ? please reduce the size to make the budget fit within the margins without sacrificing legibility

ANNEX E: Project Budget Table

Please attach a project budget table.

Expenditure Category	Detailed Description	Component (US\$eq.)							Total (US\$ eq.)	Responsible Entity (Executing Entity receiving funds from the GEF Agency)[1]
		Component t.1	Component t.2	Component t.3	Component t.4	Sub-Total	M&E	PMC		
Equipment	Hg-free healthcare devices (10,000 thermometers * 3 USD + 500 sphygmomanometer * 25 USD = 42,500 USD); Collection buckets for Hg-added thermometers (10*100 USD = 1,000 USD); XRF analysis device for Hg-related inspection (1*35,000 USD = 35,000 USD); Chemical analysis proofing of XRF		505.00				505.0		505.0	REVA

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- Finally point: we need consistency throughout the different budget tables, budget lines and items ? please remind be reminded that the budget in Annex E in Portal has to be exactly the same as the budget appended to the document's tab. Eligibility (as presented above) is also key. If needed, the PPO financial specialist can talk with the Agency for further clarification
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- 6 October 2021: Please address the comments below. As suggested in the previous comments, the PPO Financial Specialist is available to provide guidance on relevant matters.
- Some of the comments provided on September 17 were addressed, but still some issues remain. The main point is referred to the last comment provided: we need consistency throughout the different budget tables, budget lines and items, and the current submission lacks consistency that resulted from the fixes. See our observations below:

1. Budget table sub-totals by components, M&E, PMC and the Totals are different in budget table in Annex A of Portal from the Portal's Table D as following - Please amend to make them match:

- Component 2 in Budget table: \$1,434,100 ? Component 2 in Table D: \$1,174,100
- Component 3 in Budget table: \$3,606,825 ? Component 3 in Table D: \$3,866,825
- Component 4 in Budget table: \$348,825 ? Component 3 in Table D: \$443,875
- M&E in Budget table: \$100,000 ? M&E in Table D: \$0
- Totals in Budget table: \$6,305,000 ? Totals in Table D: \$6,300,000

2. M&E budget in the Portal entry shows a total budget of \$115,000 while the budget table in Annex E only \$100,000.

3. The budget note for International consultants for M&E in the budget table adds up to only \$65,000 (\$30k+\$21k+\$14k) while budget allocation to M&E in the budget table shows \$95,000? Please correct the inconsistency:

Apologies to be reiterative, but we need to observe consistency throughout the different budget tables, budget lines and items in order to provide the clearance.

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- 13 October 2021: Please address the following comment:
- Despite the fact that we meet with the Agency and provided specific comments on October 7th the Agency still hasn't updated table B in the Portal ? thus, the difference in component 2 and 3 remains. Please just simply change Portal's Table B, component 2 allocation into **\$1,434,100** and component 3 into **\$3,606,825**, so the Budget figures and Table B figures are consistent.

13 October 2021: Comment addressed. the project is being recommended for further processing

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	6/7/2021	
Additional Review (as necessary)	7/15/2021	
Additional Review (as necessary)	7/27/2021	

**Secretariat Comment at
CEO Endorsement****Response to
Secretariat
comments**

Additional Review (as necessary)	8/30/2021
Additional Review (as necessary)	9/22/2021

CEO Recommendation**Brief reasoning for CEO Recommendations**

Rwanda has made great strides through several well-known waste related interventions. For example, Rwanda is renowned for its excellent policy on the banning of plastic bags. The plastic ban policy entered in force in 2008, and it has had a tremendously beneficial impact on the nature of the country and inspired other countries of the region to replicate similar measures. Moreover, the collection of waste in large municipalities, like Kigali, is effective and is ensured by a proper collaboration between private operators and the government. Another waste related highlight is the partnership between EnviroServe, FONERWA (the Rwanda Green Fund) and the Government, which led to the construction of an e-waste recycling facility that started operations in 2018.

However, there remain significant shortcomings that expose the country to the severe impacts of improper waste management, while a few rapidly growing sectors like industry, agriculture and healthcare are not implementing cleaner production measures. As a result, these sectors lead to releases of POPs and mercury through air emissions, waste disposal, effluent discharge, and soil contamination such as unintentional POPs (from open burning of waste containing chlorinated chemicals and point sources like cement kilns). Releases of such chemicals, to water sources and air, have a global impact.

The project aims to support the Government of Rwanda and its private and public sector in decoupling hazardous waste generation and harmful releases from economic growth by enhancing the introduction of the 4R approach (Reuse, Reduce, Recycle and Recovery) in priority industries and economic sectors, while at the same time enhancing private sector led national waste treatment capacity to ensure the sound management of wastes, generate income, create jobs and protect human health and the environment. The proposed project is considered innovative. Measures to regulate hazardous waste has been very successful. i.e. the ban on single use plastic bags has been effectively implemented for more than a decade now. Based on experiences and lessons-learned from the introduction and implementation of this plastic bag ban, it is expected that the phase-out of mercury and POPs containing products, and the introduction of safer

alternatives under the project will be implemented as effectively and successfully, and will demonstrate to other countries located in the region and beyond, that the introduction and implementation of such measures is doable, feasible and viable.

Furthermore, the country is one of the few in Africa where an e-waste facility has been established with Private Sector (Enviroserve) and Government Support (through provision of seed money from the Rwanda Green Fund) and is operating in a manner that is achieving compliance with international standards. The project will build on the activities of the e-waste facility and jointly explore the feasibility of locally suitable disposal/treatment solutions for additional hazardous waste streams (e.g. lead batteries, Hg containing waste).

Additional innovative interventions proposed by the project would focus on further enhancing the environmental performance of the cement manufacturer in Rwanda (CIMERWA) as well as assessing opportunities for expanding the type of hazardous waste streams that could be treated by the cement kiln and would be suitable options as alternative fuels. Finally, the project could also assess opportunities for disposal of PCB-contaminated oil from neighboring countries in the region (with a contamination lower than the limit recommended under the PCB project).

The project will develop the capacity of interested private sector partners to apply for FONERWA seed funding to launch new endeavors in waste management, waste valorization, waste recycling and waste treatment, to reduce the risks of initial investments.

There is substantial potential for scaling-up within the country, as well as within the African continent. Initially the project will predominantly focus on the capital city Kigali, but potential for scaling up lies in the expansion to secondary cities as well as newly established industrial zones.

Covid-19 responses

At the start of the project's implementation, in close coordination with the national partners, including, if already on-board, the national project team, REMA and UNDP will do a quick risk assessment to assess the impact of COVID-19 on the project and how the pandemic will impact project implementation. Subsequently recommendations will be proposed on how to mitigate those risks or reduce their impact.