

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

Edit and Submit CEO Endorsement

## 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**

**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 is 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 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, 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 presened 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.

Agency Response

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

Yes

Agency Response

**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

Yes

Agency Response

**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

**Review Dates**

	<b>Secretariat Comment at CEO Endorsement</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	6/7/2021	
<b>Additional Review (as necessary)</b>		

**Secretariat Comment at  
CEO Endorsement**

**Response to  
Secretariat  
comments**

**Additional Review  
(as necessary)**

**Additional Review  
(as necessary)**

**Additional Review  
(as necessary)**