GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

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

Review PIF 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

Agenices

UNDP

Date received by PM

10/11/2019

Review completed by PM

11/14/2019

Program Manager

Ibrahima Sow

Focal Area

Chemicals and Waste

Project Type

FSP

PIF

Part I – Project Information

Focal area elements

1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

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Agency Response

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

Secretariat Comment at PIF/Work Program Inclusion

Please provide additional information on the proposed EPR since it is unclear if the volumes of waste would be able to sustain such a system.

Also elaborate on the expectations of the polluter pay principle that is being envisaged since this seems contrary to reducing waste and promoting a green economy

Under project outcome 1.1-output 1.1.3, it is mentioned that the project will support the Government in drafting the regulatory measures related to import, phase out, management and disposal and/or treatment as well as environmental standards for POPs and mercury in various media. Considering that a lot of legal texts are developed but not often implemented please clarify what strategies will be in place to ensure that the regulatory measures will be enforced to create the enabling environment that would support, among other measures, the POPs/Hg phase out and the introduction of alternatives to hazardous chemicals

Agency Response

5 Nov 2019:

Comment: Please provide additional information on the proposed EPR since it is unclear if the volumes of waste would be able to sustain such a system.

Response: Under Component 1 – Outcome 1.1 and Output 1.1.5, the proposed project aims to develop and introduce an Extended Producer Responsibility (EPR) framework to finance the treatment of a selected number of priority waste products/certain goods.

Extended Producer Responsibility (EPR) is a policy approach under which producers are given a significant responsibility – financial and/or physical – for the treatment or disposal of post-consumer products. Assigning such responsibility could in principle provide incentives to prevent wastes at the source, promote environmentally friendly product design and support recycling and/or disposal.

EPR is an environmental protection strategy that aims to decrease the total environmental impact of a product, by making the manufacturer of the product responsible for the entire life-cycle of the product and especially for the take-back, recycling and final disposal.

EPR may take the form of a reuse, buyback, or recycling programme. EPR can also shift the responsibility for waste management from government to private industry, obliging producers, importers and/or sellers to internalize waste management costs in their product prices and ensure the safe handling of their products through a third party (recycler, waste treatment facility), etc.

Like for other policy approaches, a careful assessment of the related costs and benefits of an EPR framework is extremely important. Such a careful assessment will be supported by the proposed project. Furthermore, EPR frameworks are often designed for certain products, and cost assessments to identify which waste streams/products would most benefit from an EPR framework (and if waste volumes are sufficiently large), will also be undertaken by the proposed project.

Especially in the case of small LDCs, like Rwanda, developing and setting up management systems for the recycling and final disposal of products (often imported), in particular those that contain toxic elements and/or are hard to manage, recycle or treat, places an unfair burden on a small economy, especially when there are no financial mechanisms in place to finance the management of such waste systems. In other countries EPR schemes are currently being extended to new products, such as electrical appliances and electronics, which is also a waste stream of concern in Rwanda.

That said, as part of the project's implementation, careful assessments will be carried out on the related costs and benefits of an EPR framework, as well as research that will inform the Government and the project on which products would benefit most from an EPR framework.

Comment: Also elaborate on the expectations of the polluter pay principle that is being envisaged since this seems contrary to reducing waste and promoting a green economy

Response: The EPR framework (see explanation above) is assumed to be important for a select number of priority products (most of which are imported) that are costly to manage/recycle/treat in Rwanda.

The Polluter Pay Principle (PPP) is being proposed by the Government of Rwanda as a measure and financial incentive to ensure that local industries, in any sector (e.g. tanneries, tea plantation, textile industry, manufacturing industry, garages, etc.), are held accountable for the pollution they are causing, no matter which processing they are operating. The PPP might be more fitting to address problems that are being caused by local industries, while the EPR framework might be better fit to address challenges with respect to products that are imported and contain toxic/hazardous elements.

In any case, as part of the project's implementation phase a careful assessment of the related costs and benefits of the PPP will be undertaken, and based on its outcomes project interventions would be further detailed and proposed.

Comment: Under project outcome 1.1-output 1.1.3, it is mentioned that the project will support the Government in drafting the regulatory measures related to import, phase out, management and disposal and/or treatment as well as environmental standards for POPs and mercury in various media.

Considering that a lot of legal texts are developed but not often implemented please clarify what strategies will be in place to ensure that the regulatory measures will be enforced to create the enabling environment that would support, among other measures, the POPs/Hg phase out and the introduction of alternatives to hazardous chemicals.

Response: This is a very valid point. Indeed a lot of countries that receive GEF support find it often challenging to implement and enforce legal texts that create the enabling environment that would phase-out POPs and Hg and introduce alternatives to hazardous chemicals.

That said, Rwanda has shown in this regard considerable progress and commitment to the implementation of regulatory measures. First and foremost, Rwanda is one of the few countries in the world where a ban on single use plastic bags has been fully and effectively implemented, and 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.

Other examples that can be cited, with respect to the implementation of regulatory measures linked to waste management, is the country's nationwide community work day called "Umuganda" which can be translated as "coming together in common purpose to achieve an outcome," a practice that has long existed in Rwandan culture but only recently became mandatory. On the last Saturday of every month, from 8:00 AM to 11:00 AM, businesses close and traffic halts as citizens across the country take to their neighborhoods. Projects range from digging drainage ditches to street sweeping. All able-bodied citizens between the ages of 18 and 65 are expected to participate. As a result, Kigali is often cited as the "cleanest city in Africa."

Although this cannot be regarded as a strategy that will be used to ensure that regulatory measures will be enforced, the project is in part relying on the commitment of Rwanda to function as an example to other countries in the region, and to showcase what it is capable of.

The size and the duration of the proposed project (in particular compared to the 1 million US$ GEF-4 PCB project) will also allow for ample capacity building and support to the government to implement and enforce approved regulatory measures.

Co-financing

3. Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?

Secretariat Comment at PIF/Work Program Inclusion

- Under table C, the contribution from Enviroserve, $ 2.5 million - is marked as investment mobilized while the description said " Investment in a recycling line for acid-lead batteries AND recurrent expenditures in the operation of the e-waste recycling facility. This is contradictory as you cannot have both. Please clarify.

- The contribution from Government - $ 5.09 million - is in-kind but marked as investment mobilized. This is not correct and would need to be corrected

8 November: The explanation provided on how investment was mobilized (through consultations at national level of the PIF) is insufficient and needs further elaboration.

13 November: Please address the two comments aboce:

- Investment mob partially addressed by the Agency – still the explanation on how investment mobilized was identified is insufficient

- Even if the language suggested by GPU Manager is included in the Review Sheet, UNDP still didn’t remove the language of the NIM modality standard language. Also sensitive issues such as “*Senior Supplier: UNDP*” remained. Similarly the text still makes reference to Tracking Tools, which are discontinued.

<u>Please remove to remove these issues.</u>

1.

Agency Response 5 Nov 2019: Following the GEFSEC review process and further comments received by email, the description of co-financing used in the PIF ("Table C – indicative sources of co-financing for the project by name and by type, if available") has been slightly adjusted, to ensure descriptions are fully in line with those used in the GEFSEC Policy on co-financing and GEFSEC Guidelines on co-financing.

For further information on co-financing and changes made to co-financing descriptions, kindly refer to point no. 2 further below under the heading "Responses to GEFSEC email received on 3 November 2019".

8 November - GEFSEC comment: **The explanation provided on how investment was mobilized (through consultations at national level of the PIF) is insufficient and needs further elaboration.**

9 November - Agency Response

Please find below an overview of the investments mobilized which will function as co-financing to the proposed project. These investments are additional to GEF Project Financing and support the implementation of a GEF-financed project and the achievement of its objective(s).

UNDP TRAC	Grant	Grant	Investment Mobilized	500,000
Additional details on how the investment was mobilized: The UNDP Country Office in Rwanda will provide a grant of 500,000 US$ which will be allocated to the proposed project. This is unearmarked TRAC funding, which is allocated on a yearly basis to UNDP Country Offices worldwide. TRAC funding can be allocated to UNDP-supported activities, projects and programmes where the UNDP CO feels the funding will have the most impact. Following extensive discussions with the CO's senior management and presentations about the scope of the proposed project, the Country Office decided that it wanted to support the proposed project with a grant of 500,000 US$.				
Private Sector	Private Investor for Nduba Landfill Management / WASAC	Equity Investment	Investment Mobilized	8,500,000
Additional details on how the investment was mobilized: With respect to municipal waste management, the city of Kigali uses PPPs to ensure the collection of waste and to manage the dumpsites. There are 2 dumpsites, 1 has been closed (Kicukiro) and is posing major health issues, the other one (Nduba) has been operating (currently under WASAC, previously under the City of Kigali) since about 6 years. WASAC is currently working with Portuguese investors to establish a PPP for the construction of a new landfill and its management. The plan consists of multiple phases: Phase I: Sanitary landfill; Phase II: Organic Waste Cell/Management; Phase III: Hazardous Waste cell/management, with an implementation timeline of 5 years. The investment in the construction and implementation of Phases I, II and III are new equity investments (Investments into assets with the possibility of financial returns) and thus are investments mobilized which will benefit the achievement of the project objectives.				
Private Sector	Dépôt Pharmaceutique Kalisimbi	Equity Investment	Investment Mobilized	1,700,000

<table>
<tr><td colspan="5">Additional details on how the investment was mobilized: Dépôt Pharmaceutique Kalisimbi is a health-care waste treatment company that has been in existence since 2012. In Rwanda, every Health Care Facility (HCF) needs to have a contract with a waste collection company otherwise they will not receive a permit for operation, the same goes for pharmacies. The HCW treatment company can currently treat 150 kg/hr, which adds up to approximately 6 tonnes of HCW per week. However, the company is in the process of expanding to meet the growing demand for its services and improve its environmental performance to meet future stricter emission standards (which is the link with the project, to ensure that waste is better segregated at source, to minimize quantities of HCF that need to be treated, and to ensure releases of dioxins and furans will be minimized or eliminated). During the implementation of the project, Dépôt Pharmaceutique Kalisimbi aims to procure an autoclave and a BAT-conform incinerator. These are new equity investments (investments into asset with the possibility of financial returns), and thus are investments mobilized which will benefit the achievement of the project objectives.</td></tr>
<tr><td>Private Sector</td><td>Enviroserve</td><td>Equity Investment</td><td>Investment Mobilized</td><td align="right">1,000,000</td></tr>
<tr><td colspan="5"> Additional details on how the investment was mobilized: EnviroServe in Bugesera was established in 2018 in partnership with FONERWA (the Rwanda Green Fund) and the Ministry of Trade. It is a WEEE recycling facility that co-operates with the newly established EnviroServe e-waste recycling facility in Dubai. The facility is the second of its kind in Africa. Even though Rwanda has banned the import of used computers, Rwanda has the potential of generating between 10,000 and 15,000 tonnes of e-waste per year, which could reach 20,000 tonnes by 2020 (EnviroServe analysis, 2015). The current facility is able to process 7,000 tonnes of e-waste annually. The facility dismantles 15 different types of e-wastes and recovers aluminum, copper and steel, which are sold on to recyclers and smelters. Mother boards are shipped to the Dubai-based EnviroServe e-waste recycling facility to extract precious metals. Plastic electronics' casings are removed, and POPs flame retardant-containing ones are separated from POPs-free casings, shredded and stored. Rechargeable batteries are removed and stored for now, as well as mercury -containing lamps and switches. The facility also removes the toxic components from CRT monitors, but the toxic remnants are currently stored in the filters of the suction equipment.
During the implementation of the project and to support expansion, EnviroServe will be investing in the treatment of mercury lamps as well as acid-lead batteries, and the economically-viable treatment (which will be explored and assessed in partnership with the project) of the more complicated hazardous waste streams such as cables, batteries, mercury-containing lamps, toxic dust from CRT monitors, POPs-containing plastics, etc.). Furthermore, the facility is working on increasing the collection of used electronics through various partnerships and looking into the treatment of e-waste from the neighboring countries in the sub-region.
These investments will be new equity investments (Investments into asset with the possibility of financial returns) and thus are considered to be investments mobilized which will benefit the achievement of the project objectives. </td></tr>
<tr><td>Private Sector</td><td>CIMERWA</td><td>Grant</td><td>Investment Mobilized</td><td align="right">45,000</td></tr>
<tr><td colspan="5">Additional details on how the investment was mobilized: As part of the UNDP/GEF project "Management of PCBs stockpiles and equipment containing PCBs" additional capacity of a new cement kiln (CIMERWA) was built and the cement process was adjusted to enable the facility to dispose of PCB-contaminated oil (as part of the GEF-4 project, a total of 52.5 tonnes of PCB-contaminated transformer oil (<1,000 ppm) was treated in that manner). It is estimated that Rwanda has approximately 120 tonnes of PCB-contaminated equipment left (including ~ 36 tonnes of contaminated oil) that requires phase-out and treatment before the 2028 Stockholm deadline. The project aims to formalize an agreement with CIMERWA to subsidize waste oil disposal for REG at a price that is significantly lower than exporting the contaminated oil for treatment abroad. Without project involvement and support, it would be unlikely that CIMERWA would undertake disposal of PCB oils, therefore, the costs savings that will be achieved by treating contaminated oil locally, and the investments CIMERWA will during the implementation of the project, are considered to be investments mobilized, which will benefit the achievement of the project objectives.</td></tr>
<tr><td>Private Sector</td><td>Coca-Cola/COPED – PET collection</td><td>Grant</td><td>Investment Mobilized</td><td align="right">80,000</td></tr>
</table>

Additional details on how the investment was mobilized: Recycling of PET has always been a challenge in Rwanda, as there have been no companies involved in its collection and recycling. To address the challenges posed by PET bottles, the bottle industry (Coca-Cola) in partnership with Agroplast (recycler) have established a partnership that aims – during the implementation of the project – to start the collection of PET bottles and aim for the recycling of PET. The grant that will be provided by Coca-Cola as seed funding to support the recycling of PET is considered to be an investment mobilized which will benefit the achievement of the project objectives.				
Private Sector	Agroplast – PET recycling	Equity Investment	Investment Mobilized	120,000
Additional details on how the investment was mobilized: (Same as above – as it is the same partnership initiative, however a different co-financier) Recycling of PET has always been a challenge in Rwanda, as there have been no companies involved in its collection and recycling. To address the challenges posed by PET bottles, the bottle industry (Coca-Cola) in partnership with Agroplast (recycler) have established a partnership that aims – during the implementation of the project – to start the collection of PET bottles and aim for the recycling of PET. The equity investments that will be made by Agroplast in processing equipment to support the recycling of PET is considered to be a new equity investments (Investments into asset with the possibility of financial returns) and thus are considered to be investments mobilized which will benefit the achievement of the project objectives.				
Recipient Country Government	Cleaner Production Center / NIRDA	Grant	Investment Mobilized	450,000
Additional details on how the investment was mobilized: NIRDA currently hosts the cleaner production center. Currently the CPC is supporting garages to introduce best practices, they are also working with tea factories to introduce alternatives to hazardous pesticides, and with beer companies to generate biogas from waste. In partnership with the proposed project, NIRDA and the CPC will support the implementation of the project by providing support to selected industries and priority economic sectors (e.g. agriculture, textile, paint, healthcare) to avoid/reduce the generation of (hazardous) waste and releases through the introduction of cleaner production practices and safer alternatives (e.g. to POPs/Hg/chemicals of concern). Support that will be provided by NIRDA/CPC will in part be funded by the project and in part be funded by NIRDA/CPC itself. The support funded by NIRDA/CPC is thus considered a grant and is considered an investment mobilized which will benefit the achievement of the project objectives.				

13 November - Agency Response

1. For the Investment mobilized, it is difficult to indicate firmer details at this stage (PIF submission) in addition to the ones that were provided in the previous round of comments. Since it seems that these details were not available in the previous version of the PIF, UNDP has now included it in the most recent version now uploaded on the GEF portal. We remain available to add additional specific information if required.

If the question of the GEF Secretariat refers to the process of identifying this co-financing, it is essential to note the central role of the Implementing partner, the Rwanda Environment Management Authority (REMA), in this process of identifying investment mobilized as part of the co-financing. REMA plays a very proactive role coordinating initiatives across the country in terms of environment policy, protection, promotion of green technologies, support to investment in the country related to environment protection – and this extends to the management of hazardous and related waste addressed through this project.

A specific mission was conducted for the preparation of this PIF, which allowed the consultation of stakeholders and potential organizations to provide Investment, mobilized as co-financing to this project. REMA, following the mission and the expression of interest by these co-financing partners, followed up to provide the more detailed estimates of these amounts that are now indicated in the PIF document. We remain available for any additional information on these specific investments.

2. Regarding the Coordination section, the confusion may have come from the fact that the latest version of the PIF could not have been downloaded on the portal due to a technical issue (as mentioned in point 1 above).

In any case as a response:
- The language of the NIM modality related to UNDP’s Support Services has been removed.
- The reference to the senior supplier has been removed. The new term is Development Partner(s) as part of the new template of UDNP. As rightfully indicated in the GEF Secretariat’s comments, this role WILL NOT be played by UNDP as this s is never the ac sein projects under NIM modality.
- The reference to the Tracking tool has been replaced by the current term of core indicators.

We have taken the opportunity of this new series of comments to update, for clarity purposes, the Coordination section of the PIF with the latest text used in the NIM-version of the UNDP Project Documents, and this appears to be fully in line with the comments provided by the GEF Secretariat.

GEF Resource Availability

4. Is the proposed GEF financing in Table D (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

The LDCF under the principle of equitable access

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)

Secretariat Comment at PIF/Work Program Inclusion

PPG requested, $ 160, 000- is within the allowable amount

Agency Response

Core indicators

6. Are the identified core indicators in Table F calculated using the methodology included in the correspondent Guidelines? (GEF/C.54/11/Rev.01)

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Project/Program taxonomy

7. Is the project/ program properly tagged with the appropriate keywords as requested in Table G?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Part II – Project Justification

1. Has the project/program described the global environmental / adaptation problems, including the root causes and barriers that need to be addressed?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

2. Is the baseline scenario or any associated baseline projects appropriately described?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

4. Is the project/program aligned with focal area and/or Impact Program strategies?

Secretariat Comment at PIF/Work Program Inclusion

The project is aligned with CW focal areas programs (CW1 and CW2).

Agency Response

5. Is the incremental / additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?

Secretariat Comment at PIF/Work Program Inclusion

On the core indicators 9 and 10, the levels are quite low, and some thought on how the project contributes to future waste prevention should be factored in. On 9.6 specifically the estimated total chemicals and waste to be avoided should be included in this indicator.

Agency Response
5 Nov 2019

Comment: On the core indicators 9 and 10, the levels are quite low, and some thought on how the project contributes to future waste prevention should be factored in.

Response: With respect to core indicators 9 and 10 we note the comment of the GEFSEC. Indeed, the project proposal had initially only calculated reductions per year and had not taken into consideration the duration of the project (5 years) and sustained reductions over the project's lifespan and beyond. The core indicators 9 and 10 have been adjusted accordingly to reflect sustained reductions over the project's lifespan.

Comment: On 9.6 specifically the estimated total chemicals and waste to be avoided should be included in this indicator.

Response: With respect to core indicator 9.6 "Quantity of POPs/Mercury containing materials and products directly avoided". The comment of the GEF is noted.

Changes have been made to GEF Core indicator 9.6. A more detailed description of how these volumes/amounts have been calculated can be found below:

The estimated total waste to be avoided by the project is made up of the following:

•- WEEE: 2,500 (min) - 7,000 (max) tonnes WEEE/yr which amounts to 12,500 (min) – 35,000 (max) tonnes of WEEE over the span of the project. According to preliminary estimates of POPs flame retardant typically contained in E-waste based on recent analysis on small electronic appliances[1] (~1 kg of BDE/tonne of WEEE) the sound treatment of WEEE would lead to a reduction of min 12.5 tonnes of BDE and max 35 tonnes of BDE over the lifespan of the project (not calculating chemicals and waste avoided beyond the lifespan of the project).

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- Data on the use and import of mercury-containing thermometers and sphygmomanometers for the healthcare sector in Rwanda is absent. The project hopes to be able to obtain reliable data during the project's PPG phase. A way to calculate Hg emissions from the clinical mercury-containing thermometers, is to assume that on average 2.8 g of Hg per bed per year is released into the atmosphere. Rwanda's healthcare sector (according to the World Bank[2]) has 1.6 hospital beds per 1,000 inhabitants. With Rwanda having a population of 12,734,297[3], this comes to a total of 20,375 hospital beds, which would then result in the release of ~ 57 kg of mercury per year (0.057 tonnes/yr). Mercury is only released when a thermometer is broken, and because a themometers contains on average 0.5 grams of mercury, that implies that per year 114,000 thermometers are broken. If we assume a mercury-containing thermometer weighs on average 0.35 kg (350 grams), the total weight of thermometers assumed to break in Rwanda on a yearly basis would be 39,900 kg, thus 40 tonnes. This appears to be very high, therefore during the PPG phase, more accurate data on the actual use of Hg containing thermometers will be obtained.

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In conclusion, the project aims to phase out all mercury containing medical thermometers, and this will result in a mercury release reduction of 57 kg/yr and thus, over the 5-year lifespan of the project, will result in release reductions of 285 kg of Hg. When we also take into consideration the phase-out of mercury-containing thermometers used outside of the healthcare system, as well as mercury-containing sphygmomanometers, a conservative estimate would be that the project will result in a release reduction of 1 tonne of mercury over the project's lifespan.

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[1] https://pubs.acs.org/doi/10.1021/es051170k#

[2] https://data.worldbank.org/indicator/sh.med.beds.zs

[3] https://www.worldometers.info/world-population/rwanda-population/

7. Is there potential for innovation, sustainability and scaling up in this project?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project's/program's intended location?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Stakeholders

Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Gender Equality and Women's Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Risks

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

Please describe potential risks related to the consequences of climate change that can affect the projects and the related mitigation measures

Agency Response

5 Nov 2019:

The project conducted during the PIF stage a Social and Environmental Screening (SESP), which will be reviewed, revised and further elaborated upon during the PPG stage. The combination of all potential risks is likely to place this project in the "High Risk" category.

Therefore, during the PPG phase, the project will prepare an Environmental and Social Management Framework (ESMF) or an Environmental and Social Management Plan (ESMP) based on extensive assessments of risks to the project and its successful implementation. This risk assessment might potentially identify potential major risks, including consequences of climate change.

At the PIF stage risks related to the consequences of climate change have been considered.

Rwanda is a land-locked country located in Central Africa, therefore impacts of cyclones are unlikely, while potential drought or reduced rainfall is thought not to directly impact Chemicals and Waste related activities.

At PIF stage, it was concluded that the most significant consequence of climate change could be severe weather events, such as extreme rainfalls, potentially leading to flooding, flash floods or landslides. For now, this is the only climate-related risk listed for the proposed project (although this might change following the findings of the risk assessment that will be carried out during the project's PPG phase). The below risk has been added to Table 2: Risks and Proposed Mitigation Measures in Section 5 ("Risks").

Risk	Mitigation Measure

Extreme weather events, such as extreme rainfall, might lead to flooding, flash floods or landslides impacting waste related infrastructure (landfills, dumpsites, hazardous waste storage facilities, contaminated sites, etc.) or the infrastructure of the waste processing/recycling facilities.	The project will undertake the necessary risk assessments during the PPG phase (including updating the Social and Environmental Screening – SESP, and preparing an Environmental and Social Management Framework - ESMF or an Environmental and Social Management Plan - ESMP) to determine the suitability of project locations and locations where project interventions will be carried out. At the same time the vulnerability to the consequences of climate change of existing waste storage/disposal/treatment/recycling facilities that will be involved in the proposed project will also be assessed.

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined? Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Please address the following comment sent out by email on November 3, 2019*On Coordination: UNDP's intent to follow the National Implementation Modality, which normally implies that the Government can request the Agency to carry out executing functions as needed, please remove the mention to this Modality at this stage. On the same section, UNDP mentions that they will carry out a role that is an executing function in nature – please remove UNDP from that role.*

On the same section, UNDP mentions that the OFP will "will strive to ensure consistency in the approach taken to the GEF-specific M&E requirements (notably the GEF Tracking Tools)" – please remove any mention on Tracking Tools as they are not used anymore in GEF-7 financed projects

On the same section, UNDP intents to provide executing services -, please remove the mention on this intent now and do this following the established procedure at a later stage (CEO Endorsement at the latest).

8 November:

"As the agency knows, the implementation and execution roles on GEF projects are meant to be separate per policy and guideline. The GEFSEC will analyze any requests for dual role playing by an agency at the time of CEO endorsement and only approve those cases that it deems warranted on an "exceptional" basis. We strongly encourage the agency to look at third party options as a preferred way forward. We also strongly encourage the agency to discuss any and all options for execution that do not include the government with the GEFSEC early in the PPG phase. The technical clearance of this PIF in no way endorses any alternative execution arrangement."

Agency Response

07 November 2019

GEFSEC Question: On Coordination: UNDP's intent to follow the National Implementation Modality, which normally implies that the Government can request the Agency to carry out executing functions as needed, please remove the mention to this Modality at this stage.

UNDP Response: UNDP applies 2 types of implementation modalities:

1) **The Direct Implementation Modality (DIM)** in which case UNDP ensures the full implementation of the project, or

2) **The National Implementation Modality (NIM)** in which case the Government of the country is leading the implementation of the project.

Considering that the Government of Rwanda prefers the NIM modality for this project the mention of the NIM modality cannot be removed for now. It should also be noted that it is unlikely the Government of Rwanda or UNDP would opt for the DIM modality as it would take the ownership of the project away from the Government and would assign it to UNDP instead. Governments and UNDP generally prefer the NIM modality over the DIM modality as it supports country ownership.

—

GEFSEC Question: On the same section, UNDP mentions that they will carry out a role that is an executing function in nature – please remove UNDP from that role.

UNDP Response: The project's Executing entity will be the Rwanda Environment Management Authority (REMA) (page 1 of the PIF). In section 6 "Coordination", the executive of the project is indicated to be REMA, represented by the Director General (not UNDP). As GEF Implementation Agency, in the same section, UNDP is indicated to be the Senior Supplier.

—

GEFSEC Question: On the same section, UNDP mentions that the OFP will "will strive to ensure consistency in the approach taken to the GEF-specific M&E requirements (notably the GEF Tracking Tools)" – please remove any mention on Tracking Tools as they are not used anymore in GEF-7 financed projects.

UNDP Response: The wording "*GEF Tracking Tools*" has been replaced with "*GEF Core Indicators*".

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country's national strategies and plans or reports and assessments under relevant conventions?

Secretariat Comment at PIF/Work Program Inclusion

The project is addressing various issues, including legal/regulatory framework, reduction of hazardous waste generation, increased capacity of private sector, disposal of stockpiles etc. However, I would like to see a clear description of the relevant government policy and clear outlines of the theory of change guiding the project components and outputs.

Agency Response

5 Nov 2019:

The project's Theory of Change (ToC) guiding the project components and outputs can be found in Annex A to this Response to GEF SEC comments.

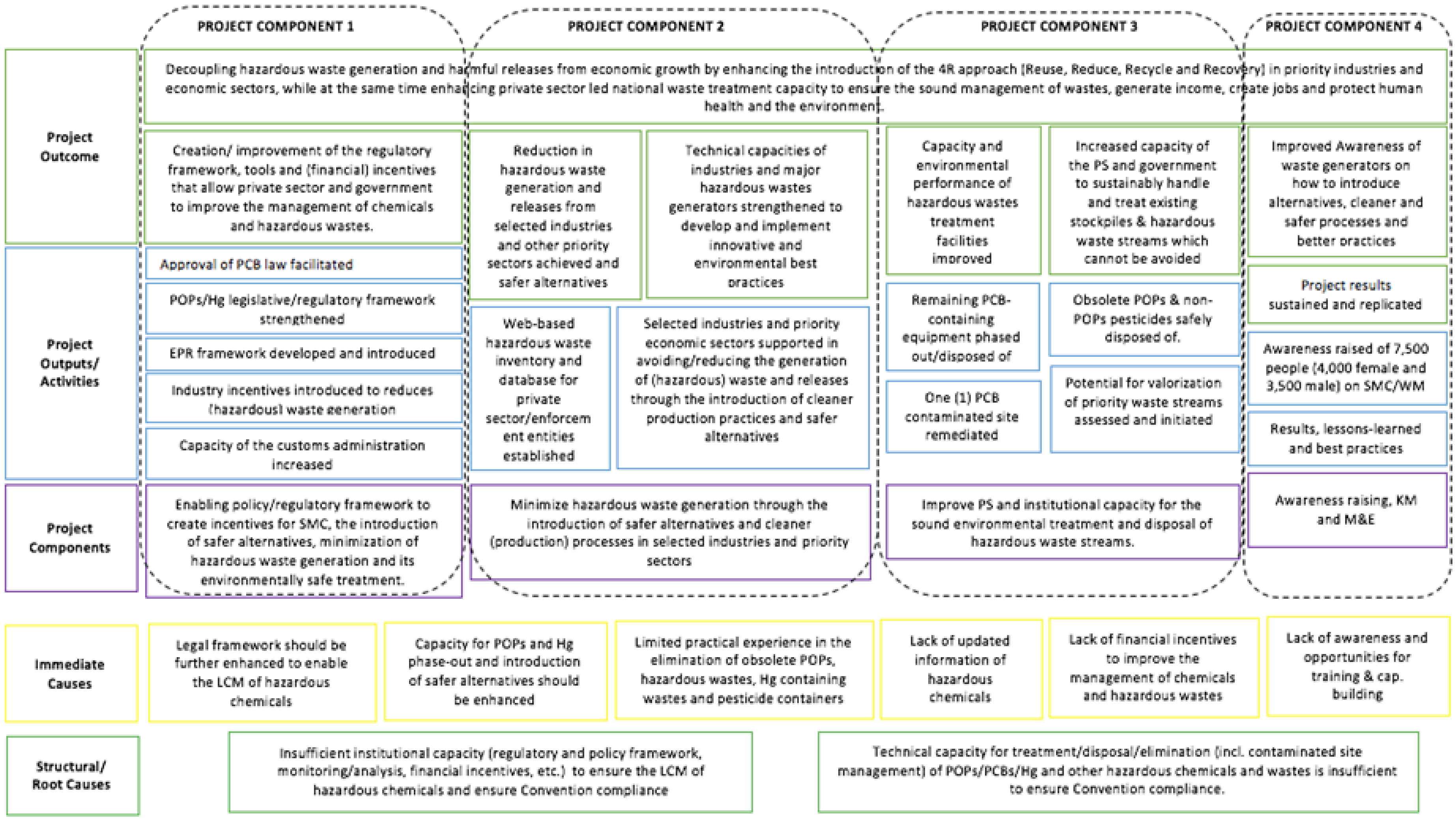

Figure 1. Theory of Change

Knowledge Management

Is the proposed "knowledge management (KM) approach" in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project's/program's overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Part III – Country Endorsements

Has the project/program been endorsed by the country's GEF Operational Focal Point and has the name and position been checked against the GEF data base?

Secretariat Comment at PIF/Work Program Inclusion

Yes

Agency Response

Termsheet, reflow table and agency capacity in NGI Projects

Does the project provide sufficient detail in Annex A (indicative termsheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table in Annex B to assess the project capacity of generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat Comment at PIF/Work Program Inclusion

NA

Agency Response

GEFSEC DECISION

RECOMMENDATION

Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?

Secretariat Comment at PIF/Work Program Inclusion

24 November: Not yet. Please address comments above.

7 November 2019: Please address comment under section related to Coordination

8 November

- Please address the comment related to how investment mobilized was identified.

- On the issue of coordination, please take note of the following guidance from GEFSEC:

"As the agency knows, the implementation and execution roles on GEF projects are meant to be separate per policy and guideline. The GEFSEC will analyze any requests for dual role playing by an agency at the time of CEO endorsement and only approve those cases that it deems warranted on an "exceptional" basis. We strongly encourage the agency to look at third party options as a preferred way forward. We also strongly encourage the agency to discuss any and all options for execution that do not include the government with the GEFSEC early in the PPG phase. The technical clearance of this PIF in no way endorses any alternative execution arrangement."

13 November: Please address the two comments on investments mobilized and the execution modality.

14 November : All comments addressed: The project is recommended for inclusion in the December Work Program

ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

Review Dates

	PIF Review	Agency Response
First Review		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		

PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval