

# Global best practices on emerging chemical policy issues of concern under the Strategic Approach to International Chemicals Management (SAICM) (EDCs, EPPPs)

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10119

**Countries**

Global

**Project Name**

Global best practices on emerging chemical policy issues of concern under the Strategic Approach to International Chemicals Management (SAICM) (EDCs, EPPPs)

**Agencies**

UNEP

**Date received by PM**

12/10/2018

**Review completed by PM**

1/13/2022

**Program Manager**

Anil Sookdeo

**Focal Area**

Chemicals and Waste

**Project Type**

MSP

## **CEO Approval Request**

### **Part I ? Project Information**

**1. Focal area elements. Is the project aligned with the relevant GEF focal area elements as indicated in Table A and as defined by the GEF 7 Programming Directions?**

### **Secretariat comment at CEO Endorsement Request**

The project responds to the elements in the programming directions for SAICM.

### **Agency Response**

**2. Project description summary. 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**

Please explain the rationale for sub-contracting to WHO and FAO to essentially execute the project while the SAICM Secretariat is already the executing agency. How would the associated budgets be managed and what would be the cost to the project budget?

May 21, 2019 - Please refer to the GEF project cycle policy and guidelines that were amended for GEF 7 and applies to all GEF 7 projects. From the explanation provided it would seem that in reality there are two executing agencies for the activities of this MSP, i.e WHO and FAO. The role proposed for the SAICM Secretariat can be done by WHO and FAO and they can coordinate with the FSP on SAICM. The PMU costs can only be used by the executing agencies so the proposed modality in the project does not allow for this.

July 1 - This deviates from the project cycle guidelines and cannot be approved as currently designed. Since the components are related to the work of WHO and FAO, it would make more sense for these agencies to execute their specific components and coordinate with the ongoing SAICM FSP to ensure knowledge capture etc.

January 13, 2022 - Comments addressed.

### **Agency Response**

The proposed execution modality was developed as a multi-stakeholder model in line with the structure of SAICM where the two supporting Agencies have been nominated by the International Conference on Chemicals Management as the lead agencies for the Emerging Policy Issues targeted by the MSP (namely, highly hazardous pesticides and environmentally persistent pharmaceuticals and endocrine disrupting chemicals). As such they have both the baseline experience/networks and technical skills to deliver the project outputs and outcomes.

This MSP was developed in close coordination with the recently-approved Full Size Project (GEF ID 9771). As such the Executing Agency of the FSP, the SAICM Secretariat, is proposed as Executing Agency for this MSP as well to ensure synergy between the closely linked projects. This includes full representation of the project results on HHP and EPPPP/EDC in the joint Knowledge Management platform of the FSP; and optimal shared project management including the combined evaluations and regular reporting.

The project management cost has been split between the three partners in recognition of the shared project management role. The SAICM Secretariat will keep responsibility for reporting, M&E, and governance arrangements (e.g. secretariat to the Project Steering Committee, also shared with the FSP). The two technical partners will access Project Management Cost lines for administration, fund management and procurement within their own components.

#### **Additional response, Jul 30:**

As pointed out by the reviewer, the execution modality is indeed joint execution by SAICM, FAO and WHO, and all three entities are listed in the project information section as Project Executing Entities. FAO and WHO will execute their own technical components; and SAICM Secretariat is responsible for coordination and compilation of the two separate components information. SAICM Secretariat's participation as an EA is also required to provide a mechanism for ongoing coordination with the FSP and to deliver the cost sharing arrangements proposed on KM and M&E.

The allocation of PMC resources has been reviewed and more equally distributed among the three agencies - please refer to revised budget sheet attached.

Please also refer to the response to the Review Section 14 on Institutional Arrangement for additional details.

Response Mar 2021

The execution arrangement has now been revised with FAO acting as sole EA. The SAICM Secretariat will have a knowledge management function to ensure continued coordination with the FSP.

Response Dec 2021

Following the removal of the HHP component as per the Aug 2021 Review Sheet, the execution arrangements have been further reviewed. WHO is the Executing Agency.

Coordination with the SAICM FSP will be ensured via cooperation with the SAICM Secretariat on development of knowledge products for the SAICM Knowledge Platform.

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

**Secretariat comment at CEO Endorsement Request**

N/A

**Agency Response**

**4. Co-financing. Are the confirmed 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, consistent with the requirements of the Co-Financing Policy and Guidelines?**

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

**5. GEF resource availability. 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 CEO Endorsement Request**

Yes

**Agency Response**

STAR allocation?

**Secretariat comment at CEO Endorsement Request**

N/A

**Agency Response**

Focal Area allocation?

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

LDCF under the principle of equitable access?

**Secretariat comment at CEO Endorsement Request**

N/A

**Agency Response**

SCCF (Adaptation or Tech Transfer)?

**Secretariat comment at CEO Endorsement Request**

**Agency Response**

Focal Area Set Aside?

**Secretariat comment at CEO Endorsement Request**

**Agency Response**

Impact Program Incentive?

**Secretariat comment at CEO Endorsement Request**

**Agency Response**

6. Project Preparation Grant. If PPG is requested in Table E.1, has its advanced programming and utilized been accounted for in Annex C of the document?

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

7. Non-Grant Instrument. If this an NGI, are the expected reflows indicated in Annex D?

**Secretariat comment at CEO Endorsement Request**

N/A

**Agency Response**

8. Core Indicators. Are the targeted core indicators in Table E calculated using the methodology in the prescribed guidelines? (GEF/C.54/Infxxx)

### **Secretariat comment at CEO Endorsement Request**

While the project is primarily policy and technical assistance it would be possible to identify reductions that may accrue. Please re-access if this is possible as a GEF 7 project it should ideally contribute to the Core Indicator 9 which also quantifies HHPs etc.

May 21, 2019 - Please note that 9.1 has HHP included in the list of chemicals so please use this to enter the expected amount of HHP to be reduced by the project.

July 1, 2019 - The core indicators are meant to track the progress of implementation so only including a reduction target at mid term goes against the process of tracking results. Please estimate a reduction target.

January 13, 2022 - Comments cleared

### **Agency Response**

Indicator 9 refers to ?chemicals of global concern? that are targeted by the project, although the specific Indicator 9.1 refers only to tonnes of POPs to be reduced. The project will lead to quantified reductions in use of HHPs including both POPs and non-POPs pesticides of global concern under SAICM. The target number of tonnes to be reduced will be set after the first field studies which will map and quantify the type and amounts of pesticides used in the project countries. The Core Indicators Table F and Annex F have been updated accordingly.

#### **Additional response - Jul 30**

A reduction target of at least 300 tonnes of HHPs reduced is provided for Indicator 9.1, and the basis for the estimate is provided in the additional explanation section. The project Results Framework is also updated with the newly defined target for HHP reduction

Response Mar 2021

The Core Indicators have been updated based on the revised logframe targets.

**9. Project taxonomy. Is the project properly tagged with the appropriate keywords as in Table G?**

### **Secretariat comment at CEO Endorsement Request**

Please include the Rio Markers.

May 28, 2019 - Comment cleared.

### **Agency Response**

Noted. The Rio Markers are included in the updated Portal submission of April 2019, and in the revised project document (page 5 and Annex G).

**Part II ? Project Justification**

**1. Project Description. Is there 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. Project Description. 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. Project Description. Is there an elaboration on the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there more clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?**

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

**4. Project Description. Is there an elaboration on how the project is aligned with focal area/impact program strategies?**

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

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

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

**6. Project Description. Is there a 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. Project Description. Is there a better elaboration to show that the project is innovative and sustainable including the potential for scaling up?**

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

**8. 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** N/A

**Agency Response**

**9. Child Project. If this is a child project, an adequate reflection of how it contributes to the overall program impact?**

**Secretariat comment at CEO Endorsement Request**

N/A

**Agency Response**

**10. 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**

**11. 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**

Yes

### **Agency Response**

12. 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**

13. Risk. 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**

For the high risk identified on loss of staff that were trained some more emphasis on ensuring the institutions in which they reside fully document the training so that new people can be trained. This would be in addition to the proposed measure of train the trainers.

May 29, 2019 - Comment cleared.

### **Agency Response**

Noted and agreed. The Proposed Alternative Scenario is more explicit about the training of regulators to identify HHPs, and the mitigation measures proposed for addressing risks of staff turnover, including:

- Ensuring a wide representation of trainees among different institutions including civil society and regional institutions;
- Participatory approach to developing the training materials, resources, and training plans together with the relevant institutions, to ground training in regional realities and build ownership of the training approach and responsibility;
- Proper documentation and sharing of the training materials both within the institutions of the trainees but also via FAO and SAICM Secretariat knowledge management mechanisms.

Since initial submission of the project, FAO has had an EU funded project approved (MEAs III) which will work in Pacific. During the inception phase of the project implementation, a baseline update will be conducted in the initial countries proposed for the HHP output in Africa and the Pacific, to confirm and reflect recent initiatives and activities, and ensure full coordination and avoid duplication.

**14. 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 Institutional arrangement is unclear along with the associated budgets. What is the justification for the SAICM Secretariat to be the executing agency and then shift the execution of specific components to other institutions like FAO, the UN Chemicals and Health Branch and WHO. How will these organizations manage the execution function and at what cost to the project? Please also clearly elaborate on what types of staff etc will be hired under the Project Management Costs and why these costs are not available to the institutions that are actually implementing the work.

May 28, 2019 - The comments provided do not respond to the concerns raised in the review. While we acknowledge that there is a link to the existing GEF 6 SAICM project 9771, this MSP has been submitted in GEF 7 and as such must comply with the policies for GEF 7 which differ from previous cycles. In this regard very clear justifications must be made when proposing self execution.

For example, the explanation for involvement of the SAICM secretariat is that it will be supporting the M&E and knowledge management, however the associated activities do not appear in the budget presented with the project.

July 1, it does not appear that a budget revision was conducted.

January 13, 2022 - Comment Cleared

### **Agency Response**

This model results from a high level of inter-Agency collaboration during the PPG phase and will ensure a substantive and tangible role for all agencies in further developing and documenting the EPIs according to their comparative advantages and designation by the ICCM as lead agencies for the relevant EPIs.

The link with the related SAICM FSP (GEF ID 9771) and particularly its Knowledge Management platform is considered essential. The project proponents believe this will be best achieved by a joint EA at the SAICM Secretariat for both projects. The SAICM Secretariat provides coordinating functions and a single reporting point for periodic reporting and M&E functions (see also earlier response, Question 2).

The output-budget indicates that the funds for the sub-contracting organizations are split between the technical output budget columns; and under the PMC budget column. Funds for project activities (output budget) are clearly separated and distinct from the execution support funds, which will cover fund management, reporting, procurement and other project management functions. The PMC allocation being shared between the main Executing Agency and the execution partners (USD 30,000 for WHO and USD 45,000 for

FAO, in recognition of the higher amount of field work and contracting required for the HHP work).

**Additional response Jul 30:**

The execution of the project is indeed shared by the three Agencies and this is reflected in the updated project governance structure (Fig. 1) to clarify that both FAO and WHO are also Executing Agencies and will be accessing the PMC resources.

The justification for the role of the SAICM Secretariat is that a 'coordinating EA' is required in order to provide single, consolidated information from the two technical components, which are distinct and only come together under the SAICM umbrella of Emerging Policy Issues. Furthermore, a coordinating function will ensure a consistent financial and administrative management of the project; and provide single project reports and financial information as required by the IA, GEF, and evaluators.

The costs for SAICM Secretariat support for KM and M&E functions are not included in the relevant MSP budget because they are covered by the SAICM FSP resources. As well as providing necessary continuity and consistency across the GEF programme on Emerging Policy Issues, this coordinated approach also ensures cost efficiency. If the SAICM Secretariat is not executing the MSP, additional funding would need to be allocated to M&E and KM, which would reduce the available funds for the two technical components.

The distribution of PMC resources has been updated to reduce the relative share of the coordinating EA (SAICM Secretariat) to USD 60,000 over the three years (from USD 105,000). The difference has been split between the other two Executing Agencies in the same proportion as previously, recognising extra field work and management time required by FAO. New amounts are USD 48k for WHO (from 30k) and 72k for FAO (from 45k).

The section on Institutional Arrangement and Coordination has been updated to reflect the above justification and details on the roles of the EAs.

The budget has been updated to reflect the revised distribution of PMC resources among the three Executing Agencies.

**Response Mar 2021**

The budget has been updated and resubmitted. Please see earlier response on execution arrangements (Q2). The Project Management Cost is assigned to the Executing Agency, FAO, with a proportion remaining with WHO to enable them to administer the grant.

**Response Dec 2021**

Following removal of the HHP component as per the Aug 2021 Review Sheet, the budget has been updated and resubmitted.

**15. Consistency with national priorities. Has the project described the consistency 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**

**16. 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**

**17. 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**

In the M&E budget please note that side events etc are not eligible costs. These are for specific activities outlined in GEF policy and guidelines. Please revise the budget accordingly.

May 28, 2019 - please note that in the budget and work plan file that the budget still includes funding for the side event.

January 13, 2022 - Comment Cleared

**Agency Response**

The budget allocation in the M&E plan is for the closing Technical Steering Committee/Closing Workshop (15,000 USD) which will cover participation of selected country representatives from a sample of beneficiary countries. This will allow the global project final conclusions, lessons learnt and recommendations to benefit from a wider perspective.

The side event mentioned in the ?time-frame? column of the M&E plan is for information only, since there is no associated cost for the side event under the M&E budget of the MSP. The SAICM Secretariat, as Executing Agency for both the FSP and the MSP, will be organizing a joint side event for both projects, and all associated costs are included under the KM component of the FSP.

The reference to the side event in the M&E table is removed for clarity.

**Additional comment Jul 30:**

Noted, this was an error in the re submission. The budget and work plan file has been updated and uploaded.

**18. 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**

**19. Annexes:**

Are all the required annexes attached and adequately responded to?

**Secretariat comment at CEO Endorsement Request**

Yes

**Agency Response**

**20. 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**

Project Results Framework

**Secretariat comment at CEO Endorsement Request**

Provided

**Agency Response**

GEF Secretariat comments

**Secretariat comment at CEO Endorsement Request**

January 19, 2022: Please see comments from the PPO:

1. On PMC proportionality: There is no proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 8.7%, for a co-financing of \$12,746,000 the expected contribution to PMC must be around \$297,077 instead of zero. As the costs associated with the project management have to be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a

similar level. Please amend either by increasing the co-financing portion and/or by reducing the GEF portion.

2. On M&E: Kindly note that the M&E totals, from the M&E budget and project budget table, do not match. Please review and confirm the final numbers. As a kind reminder please note that, for projects up to 5 million, the recommended M&E budget is around 5% of the total amount. As it stands the M&E budget represents 6.1%.

$18,333 + 10,000 + 36,500 = \$64,833$

Looking at these numbers, the PMC numbers also do not match the total either:  $\$30,500 + \$51,333 + \$33,833 = \$115,666$  instead of  $\$80,000$

3. Environmental and Social Safeguards: We note that UNEP attached the Environmental Social and Economic Screening Determination and the project overall ESS risk is classified as low. The Environmental Social and Economic Screening Determination sheet, however, does not include the Safeguard Advisor's review and recommendation as UNEP's usual practice. Please clarify whether the Safeguard Advisor reviewed the Environmental Social and Economic Screening Determination if possible and provide updated Environmental Social and Economic Screening Determination.

4. Knowledge Management: We note that the project has some description of knowledge management activity including utilization of knowledge management platform of SAICM EPIs (GEF ID 9771). However, knowledge management products from Output 1.1 and 1.2 is not clear. Please describe in more detail about 1) proposed knowledge outputs to be produced and shared with stakeholders, and 2) plans for strategic communications.

5. On the Budget: It looks like some positions that should be fully charged to the PMC have been charged throughout the components. Per Guidelines, the costs associated with the execution of the project (like project's staff) have to be covered by the GEF portion and the co-financing portion allocated to PMC. Given the fact that no PMC from the co-financing has been allocated so far, please include these cost in the co-financing portion of the PMC per the resubmission.

March 7, 2022 - Comments have been addressed.

## **Agency Response**

### **Response Feb 2022**

The points above are noted and have been addressed in the resubmission as follows.

1. PMC Proportionality: The error was in the breakdown of the cofinance from the Executing Agency (WHO). Their contribution did include staff costs that would support project management, but this staff cost was previously included under the technical component. Their letter has been re-issued with the contribution to PMC explicit. Table B and the Cofinance Budget annex have been updated accordingly.

2. M&E Budget: the M&E Budget column (budget annex H) is consistent with Table B and the M&E Table in the CEO Endorsement Request (Table 5). The costs of inception & Closing workshops have been reduced to bring the total to 5% (10,000 + 10,000 + 10,000 for MTR and 21,500 for TE = 51,500 USD). We do not see the numbers quoted (18,333 + 10,000 + 36,500 = \$64,833) in any of the project tables or annexes. Similarly for PMC, we do not see the numbers quoted (\$30,500 + \$51,333 + \$33,833 = \$115,666) but have updated the PMC costs (see point 5 below).

3. ESS: The ESERN Review uploaded was the wrong version. Apologies and the signed version by the Safeguards Advisor is now uploaded.

4. KM: The specific knowledge products being produced from Component 1 will be simplified and summary version of the toolkit and manual contents. These have been clarified and some

indicative knowledge products proposed. See new activity for the SAICM Secretariat on KM products added under Output 1.1 and in the workplan Annex; and further detail added in the KM Section 8. On strategic communications, the link of the publications and outreach work with the overarching SAICM KM platform & media strategies is highlighted (Section 8).

5. PMC Budget: the WHO Project Manager budget line has been amended to transfer project management commitments to cofinance as suggested and as per GEF Policy and guidelines. Additionally, some technical support work previously costed into this budget line under C1 has been accommodated in the separate budget line for WHO Technical Assistance. Annex H updated (lines 1101 and 1103).

**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**

This is a one step MSP and as such PPG will be reimbursed.

**Agency Response**

Project maps and coordinates

**Secretariat comment at CEO Endorsement Request**

**Agency Response**

Part III ? Country and Agency Endorsements

**1. 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 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

#### **1. RECOMMENDATION.**

Is CEO endorsement/approval recommended?

## **Secretariat comment at CEO Endorsement Request**

Not at this time. Please respond to the review and revise the project as requested.

July 1, 2018 - Not at this time. Please revise the project for further consideration.

Nov 13 - Not at this time. Please see below:

1. The project contains specific country interventions and as such require OFP endorsement letters. Please consult with the relevant OFPs and have the letters of endorsement.

2. The SAICM Secretariat cannot be in an executing role as it is part of UNEP which is an implementing agency of the GEF. Please reconsider the executing arrangements.

August 18, 2021 - Please remove the elements on HHP as the FARM program will take on those activities and re-submit the MSP for consideration.

January 19, 2022 - Please respond to the comments from the PPO and revise as appropriate.

March 7, 2022 - Comments have been addressed and project is recommended for CEO approval.

#### **Review Dates**

	<b>1SMSP CEO Approval</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>3/1/2019</b>	<b>7/30/2019</b>
<b>Additional Review (as necessary)</b>	<b>7/1/2019</b>	<b>3/22/2021</b>
<b>Additional Review (as necessary)</b>	<b>11/13/2019</b>	<b>12/17/2021</b>
<b>Additional Review (as necessary)</b>	<b>8/18/2021</b>	<b>2/1/2022</b>
<b>Additional Review (as necessary)</b>	<b>1/13/2022</b>	

#### **CEO Recommendation**

#### **Brief reasoning for CEO Recommendations**