

Establishing a circular economy framework for the plastics sector in Ghana

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

10401

Countries

Ghana

Project Name

Establishing a circular economy framework for the plastics sector in Ghana

Agencies

UNIDO

Date received by PM

6/14/2021

Review completed by PM

10/26/2021

Program Manager

Leah Karrer

Focal Area

Multi Focal Area

Project Type

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

(Karrer, Nov 26, 2021). Yes.

(Karrer, Oct 13, 2021). No.

1) The revisions to incorporate reference to reuse/refill/repair/rent systems are most welcome as well as the second call for reuse proposals. To help foster new reuse systems, we recommend during inception discussing collaboration with the Consumers Beyond Disposability initiative within GPAP. CBD is working with countries to develop such systems. Christian Kaufholz <Christian.Kaufholz@weforum.org> is the lead for CBD.

e) Please clarify in Activity 2.2.4.4 what the second open call will entail. Will seed funding be provided for the selected projects? Training? Mentoring? Market access?

Please clarify in the table after paragraph 57 and in Annex L how the Davero Ice pilot project fits with the intent of reducing plastic pollution. The description in Annex L does not indicate plans for reusable cups or jugs or any plans for reducing single use plastic products. The response notes the option for locals to refill water containers, but this idea is not stated in the PIF suggesting this is not the intent of the company.

2) The project has been revised to track data regarding the importation of plastic products. During inception please consider how to limit the importation of plastic products. ?Reduce? is the first step in the circular economy model. The situational analysis needs to consider what laws exist (if any) with regard to limiting or allowing plastic products to be imported.

(Karrer, July 23, 2021). No.

Please ensure the Project Document is posted to the Portal.

Agency Response

The updated project document has been posted to the portal.

1) Para 49 has been updated to include consultation and engagement with relevant projects in Ghana and multi-stakeholder fora such as the GPAP including the Consumers Beyond Disposability initiative. In addition, Activity 1.1.4.11 has also been updated to include consultation with the CBD initiative among others.

e) Annex M, Activity 2.2.1.5 has been updated to clarify the type of assistance that will be provided. In addition, Activity 1.1.4.7 Conduct an assessment of green government procurement guidelines has been updated to include reuse systems for events.

The table has been updated with a larger description of the system Davero Ice has proposed putting in place. Activity 1.1.4.2: Develop a single-use plastic phase-out strategy to discourage the production, import, and use of single-use plastics has also been updated to ensure pilot projects are not producing any single-use plastics and are incentivizing their reduction.

2) The importance of the Basel convention amendments underway in Ghana by the BRS-1 team has been stated in the CER under Para 18. The work of the BRS-1 team aims to eliminate illegal plastic imports into Ghana. In addition, the project seeks to gain better insights of the type of plastic being imported into Ghana legally and illegally under Output 1.1.1. The ability to collect data and link systems of plastic import and waste generation data will enable the government to legislate more effectively ensure there is proper oversight of the plastic sector. The development of single-use plastic phase out strategy under Activity 1.1.4.2 seeks to significantly reduce plastic in the country and provide further incentives for reuse business models to flourish.

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

(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No. While overall the project is excellent, please address the following points.

1) The circular economy model is discussed as a core tenant of the project; however, the core strategies are not adequately represented in the project plans. The focus is on alternative materials and recycling. The critical solution of reuse, including refill, repair, remanufacture, resale, rent and other extended life options, are often entirely missing. Yet these solutions are a fundamental part of a circular economy model as illustrated in Figure 1, highlighted in the New Plastic Economy discussion of after-use plastic economy

(https://www.ellenmacarthurfoundation.org/assets/downloads/EllenMacArthurFoundation_TheNewPlasticsEconomy_Pages.pdf) and further stressed in the Council and STAP comments. Examples of where these aspects are missing include:

a) the barriers identified for Output 1.1.2 (assessment of legal and institutional capacities) notes lack of policy framework to adopt circular economy; however the activities only note assessment of alternative materials and eco-design. Assessments of reuse measures (including refill, repair, remanufacture, resale, rent, etc) need to be included as an activity.

b) although the first barrier identified for Output 1.1.3 notes the lack of infrastructure for reuse, this barrier is not addressed in the project response activities. Further, the response activities are to develop training materials. Consideration needs to be given to how to actually address the lack of reuse infrastructure, such as providing a dishwashing service for food stands, fast food cafes, restaurants, giving grants to help eateries buy reusables, and establishing regulations requiring sit-down service to be on reusable dishware. Similar efforts are possible for other sectors, such as grocery stores and pharmacies to promote refillable options to reduce single-use plastic packaging. Incentives and regulations to encourage repair, resale, and rent businesses would also foster use. These Output activities need significant rethinking and expansion of activities to include reuse options.

c) similar to the previous concerns, the first barrier to Output 1.1.4 (policies and regulations) identifies the lack of reuse legislation; however, the response activities do not address this barrier. Instead, the activities are focused on single-use phase out,

material standards, alternative materials, procurement, and littering. Reuse policies need to be added as activities (see previous suggestions).

d) the activities for Output 2.1.2 (private sector capacities strengthened at all value chain stages) focus only on plastic alternatives. Please expand to address all aspects, including reuse.

e) the outputs under Outcome 2.2 (pilot projects) are focused on switching from fossil fuel-based materials to alternative materials, reducing plastic leakage and demonstrating after-use. And yet the after-use pilots are entirely focused on recycling and reuse options are missing. Of the 12 pilots, 8 are focused on recycling, 2 on improved water, 1 on alternative material, and 1 market for recycled plastic. This gap is further confirmed by the table of categories after para 57. There need to be reuse pilot projects in the portfolio.

f) Relatedly, as written, only Activity 2.2.4.2 mentions reuse, and yet none of the pilots address reuse. Reuse should be reflected in the activities particularly in Activities 2.2.4.1, 2.2.4.4 and 2.2.4.3, and considered for others.

g) the Baseline Scenario section is focused on recyclability and marine littering. It does not address the status of reuse options in Ghana. Many developing countries have thriving repair and resale sectors; although at the same time growing single-use plastic packaging resulting in less reuse and refill. The status of these options and other reuse options needs to be explained.

2) The Output 1.1.1 Situational analysis needs to examine the entire value chain of plastics from source to sink, including the products being imported or produced in Ghana (the brands of the products, importers), where sold, who purchases, and waste practices, including whether reused or recycled. Currently, the analyses seem focused downstream on waste aspects. Understanding upstream is important in order to identify and execute appropriate interventions along the entire value chain.

3) Activities 1.1.2.2 (bottle deposit scheme) and 1.1.2.3 (EPR scheme) are very welcome, but seem misplaced. Output 1.1.2 focuses on assessments. Output 1.1.4 seems more appropriate as it's focused on taking action, including policies and legislation being implemented.

4) The text description of Component 2 (para 30) lists several principles to a circular plastic economy. It's unclear what 'food-grade plastic?', 'product-grade plastic?', and 'construction material-grade?' mean. From reading the projects it may be referencing packaging. Please clarify. Also, it's unclear why energy recovery, degrade and disposal are included in the noted list since they are not conducive to a closed-loop system.

Further energy recovery creates demand for waste, which is antithetical to the purpose of this project and, therefore, not funded by the GEF.

5) Outcome 2.1 (capacity building of stakeholders) text (para 53) mentions the installation of well-labeled public waste bins for collection. This action seems rather random as the other activities are focused on training. It seems better suited elsewhere, such as under Output 1.1.4, which is more action-oriented.

6) Regarding the pilots, please clarify the funding beyond the start-up phase. How will these projects continue to be sustained? What business plans have been created to ensure self-financing?

7) Regarding the pilots: a) Eco-Solve is creating casava-based biodegradable bags, yet these do not degrade until 70C, which does not exist in the marine environment. Consequently, they still contribute to marine litter; b) NetPlast is making plastic pavement, which is controversial due to the microplastics potentially created from road abrasion. Please address; c) Davero is promoting filtered water; however, it's unclear how it will be distributed. If provided at public fountains, then how will people collect the water? Will disposable cups be provided, which would defeat the purpose? Please clarify the system for distribution that does not contribute to waste.

6) Output 3.2.1 (Communication strategy) activities need to extend beyond education on recycling. They need to address the culture of disposability and the misperception that plastic-wrapped is better and cleaner.

7) In Output 3.2.1, please add GHG emissions to list of environmental systems impacted.

8) Please ensure that any activities related to switching from plastic to alternative materials is clear that the materials need to degrade in the marine environment. The table after para 57 final row notes "biodegradable plastic production" which needs to be revised to indicate they will degrade in seawater.

Agency Response

1) The call for Expression of Interests for pilot projects for demonstration and funding by the GEF received many applications. Despite engagement with both the NPAP and MESTI, the applications focused on alternative materials, recycling and other aspects of the circular economy while not directly addressing other circular economy business models. To remedy this, the CER has been updated to include a greater emphasis on upstream circular business models and addresses the specific points below. In addition, an Activity (2.2.1.5 Conduct an open call for expressions of interest in reuse pilot projects) to source reuse pilot projects has been proposed as part of the CER which should address these concerns. UNIDO and MESTI's ongoing involvement in the

NPAP ecosystem within Ghana will also ensure that access to information and stakeholders regarding other circular economy projects including reuse will be timely.

a) Paragraph 47 has been updated to reflect the need to assess upstream circular business models. In Annex L an activity has been added (Activity 1.1.2.2: Undertake an assessment of upstream circular economy business models) to conduct an assessment of upstream circular economy business models that could be deployed in the country. The assessment will include an overview of existing opportunities and a catalog of ongoing and forthcoming projects in this area.

b) Updates have been made to activities under Output 1.1.2, 1.1.3 and 1.1.4 to ensure upstream circular economy practices are highlighted as being important elements of the circular economy framework within the country and that concrete actions are taken to assess the current state of reuse models, gaps in the institutional framework for the uptake of reuse models and the infrastructure limitations for reuse models. The Activities are designed to complement each other such that when an assessment is completed, clear and actionable information is available to reorient the institutional framework toward reuse models.

c) Activity 1.1.4.6 has been updated to reflect water refill business models. Activity 1.1.4.11 focuses on developing policy and regulatory proposals to incentivize reuse systems.

d) Activities under Output 2.1.2 within Annex M: Component 2 Activities have been updated to address reuse models.

e) The Davero Ice pilot project is an opportunity to implement a reuse model (refilling water containers for use by locals). The gap is noted and activities under Component 2 have now been proposed that seek to address the gap by conducting an assessment of reuse models currently in use throughout the country and enhance the institutional framework to enable the set-up and successful operation of reuse models within the country. The Open Call was not successful in attracting a reuse pilot project despite engagement from project stakeholders. For this reason, a second open call is proposed as an activity under Activity 2.2.4.4.

f) Activities under Component 2 have been updated to reflect the importance of reuse and specifically mention training, marketing and R&D activities to promote reuse models. The Open Call for pilot projects held during the PPG stage was not successful in attracting a reuse pilot project despite project team engaging with stakeholders. For this reason, a second open call is proposed as an activity under Activity 2.2.4.4 to attract reuse pilots.

g) Paragraph 29 has been updated to explain the baseline scenario for circular pilot projects:

?Through a competitive open call process, the project published a call for expression of interest for the submission of pilot projects. Despite extending the call and engaging with stakeholders within Ghana through the NPAP, MESTI, UNIDO field

office and UNIDO consultants, no expressions of interest were submitted for reuse circular business models.?

2) Paragraph 14 which provides details of the Ghana NPAP's situational analysis now also refers to the Ghana NPAP's study *Trade and the Circular Economy: A deep dive into plastics action in Ghana*. The study provides additional granularity on the volume of plastic imported and exported from Ghana and the limitations on the development of local plastic value chains. Paragraph 46 has been expanded to reflect the results of the NPAP study and provide further explanation about the types of upstream activities that take place within the country. Annex L: Component 1 Activities, Activity 1.1.1.2 has also been updated to ensure better collection of upstream plastic data.

3) These activities have been moved under Output 1.1.4 as suggested.

4) Component 2 (para 30) has been updated to clarify the meaning of food-grade plastic, product-grade and construction material grade. There are no pilots that involve energy recovery, degradation or final disposal and reference has been removed.

5) This reference has been removed. The project does not intend to install public waste bins.

6) The proposed pilot projects come from established private sector companies which are expanding operations into new business areas or expanding existing operations with a focus on circular economy. Within the co-financing table, the pilot companies are putting in significant finances on top of the GEFTF grants received. For companies that are less established, the GEFTF funds are supporting design, development and scale-up. The companies will be supported throughout the project life through capacity building, targeted training and ongoing monitoring to ensure business models are sustainable. In addition, Activity 2.2.1.2 is focused on providing business model support and scale-up to enable pilot companies to transition into new areas or scale existing operations in a sustainable way.

7a) Pilot projects; Eco-solve. Under Activity 1.1.4.4 specific reference is made to developing standards for alternative materials to be adapted and used within Ghana. Reference is now made to specific marine environment biodegradability.

7b) Nelplast: Nelplast's activities and sites where products are installed will be monitored in line with the ESMP to track microplastic production. Capacity building, training and technical assistance will be provided to ensure micro plastics are minimized through the different phases of operations including the production of plastic bricks. R&D undertaken during the project will also assist Nelplast with optimizing production processes to minimize microplastic production.

7c) During the inception phase of the project, one-on-one meetings will be held with each pilot project company to ensure full compliance with all project expectations (Para

52 has been updated to reflect this). Specific focus will be made to ensure Davero will not be using disposable cups and solutions provided for water collection by locals. Activity 2.2.2.1 has also been updated to specifically mention that single-use plastics are not to be used for water refilling.

6) Output 3.2.1 (communication strategy) activities has been updated. Activity 3.2.1.1 and Activity 3.2.1.2 have both been updated to better reflect the circular economy solutions that exist and to overcome behavioural barriers that might exist.

7) Output 3.2.1 has been updated throughout the CER to include GHG emissions.

8) Marine environment degradability has been specifically noted in the table following Para 57. The Activity, 1.1.4.4 within Annex L has been updated to specifically investigate the appropriate standard to apply for full natural biodegradability in both the natural environment and marine environment.

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

Secretariat Comment at CEO Endorsement Request (Karrer, July 23, 2021).
Not Relevant.

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
(Karrer, Nov 1 2021). Yes.

(Karrer, Oct 29, 2021). No. From PPO -

1) On PMC Proportionality: there is not proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 4.94%, for a co-financing of \$79,023,668 the expected contribution to PMC must be around \$3,903,770 instead of \$2,900,000 (which is 3.6%). 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 ask amend either by increasing the co-financing portion and/or by reducing the GEF portion.

2) (SJ):

- Maintenance and Sustainability Africa: change ?Private sector? to ?CSO?.
- RePATRN Ltd \$5M: as per the co-financing letter indicating this will be cash contribution, change ?Other?

(Karrer, July 23, 2021). Yes.

Agency Response

1) Co-financing has been reallocated to PMC and now accounts for \$3,925,000. Relevant sections of CEO Endorsement have been updated. Specifically:

? Section B) PROJECT DESCRIPTION SUMMARY. The Co-financing values for Component 2 Output 2.1 and 2.2 have been updated along with the PMC.

? Table 2: Contribution of the incremental cost to the baseline between Para 82 and Para 83.

2) Both MSA and RePATRN updates have been completed.

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

(Karrer, Nov 1, 2021) Yes.

(Karrer, Oct 29, 2021). No - from PPO regarding the budget:

- 1) We couldn't find the budget in excel format appended to the documents? tab, so we could not run the calculations to contrast with the budget included in Annex E in Portal. Please upload it.
-
- 2) There are several budget items labeled as ?Sundries? ? unspecified miscellaneous expenses have to be covered by co-financing resources ? GEF funds cannot be utilized for unspecified costs (\$156,500). Please ask remove these costs and reallocate the funds.
-
- 3) While not significant, there are several budget lines labeled as ?DCS? (Direct Costs Services) to be managed by UNIDO ? we have previous conversations with UNIDO on

this issue and we have informed that the GEF cannot cover these costs (\$5,746). These budget lines have to be removed.

(Karrer, July 23, 2021). Yes.

Agency Response

- 1) Excel file has been uploaded. This file is Annex U ? Output based budget.
- 2) Sundries have been deleted from the budget and reallocated as requested.
- 3) DSC have been removed from the budget.

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 (Karrer, July 23, 2021).
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
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

The increase in the indicator amounts is very welcome. And the detail on the methodologies to convert waste to GHGs and uPOPs is also greatly appreciated. Please clarify a few aspects of the calculations:

- 1) Please clarify the logic of Table 3: Incremental value of GEF involvement in the pilot projects. Do the amounts under Reduction mean the amount the project reduced production of plastics? And Collection is amount collected that would have gone into waste streams? And Recycling ? how is that different from Collection? And what is the basis for the baseline vs GEF project amounts ? what is currently occurring vs what will occur with the project funding, including the baseline activities??

2) Also with regard to the indicator methodologies, please clarify the UPOPs table, specifically what is the calculation from open burning of plastics at 5,9816.26 ton of waste to 1.85 UPOP gTEQ/year? How are the air and land factors used to calculate the gTEQ/year? Also is the amount of waste only plastics or all waste?

3) For the GHG emissions calculation, where did the amount for the Plastics-open burning at 6,117.76 come from?

Agency Response 1) Para 82 has been updated with the following description:

Reduction means the elimination of plastic production thereby avoiding plastic waste generation. For example, Pure Home Water filtering water, there is no need to use plastic products for the system, consumers would not need to buy sachet water which would avoid the generation of plastic waste.

Collection is the amount of waste that is physically collected from the environment or from designated collection bins/facilities. Collected plastic will be treated/recycled later but it is an important part of the indicators and ongoing monitoring of the success of the project. A sustainable and well-functioning plastic collection network is a key part of ensuring the successful operation of recycling facilities and has been identified as a key barrier to investment in other circular solutions within the country.

Recycling occurs when the collected waste is processed to flakes or pelletized for use in other products (food grade products, construction materials or other products).

Some pilot company are already performing ?waste-related? (collection/recycling) activities. The pilot companies provided their existing capacity for each type of activity (reduction, collection, recycling) and this capacity was considered as the baseline.

The GEF project column introduces the total capacity of the activity once the pilot project is realized (GEF funds are being used to increase capacity, explore new business models, etc.) Therefore, the incremental amount was used to calculate the environmental benefits of the GEF funds.

2) Para 84 has been updated with the following information:

The baseline studies of the NPAP concluded that approximately 14.96 % of Ghana's plastic waste is disposed of by open burning annually. This means that 14.96 % of the collected plastics of the project would have been open burned. If these pilots did not exist, then this waste stream could go into the environment or municipal solid waste.

The UPOPs calculations are based on the POPs Toolkit: <https://toolkit.pops.int/> specifically Source Group 6 dealing with open burning processes: https://toolkit.pops.int/Publish/Main/II_061_OpenBurning.html?panel=1#SpryAccordion1

Since PVC in general has a higher UPOP impact factor, we calculated this stream separately.

The NPAP baseline study was able to calculate the fraction of plastic waste within municipal solid waste and therefore plastic waste values were used.

3) Paragraph 85 has been updated with the following information:

The baseline studies of the NPAP concluded that approximately 14.96 % of Ghana's plastic waste is disposed of by open burning annually. Plastic collected and reduced during the GEF project period is 40,785.05 t/y. 15% of this is 6,117.75 t/y.

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
(Karrer, July 23, 2021). 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
(Karrer, July 23, 2021). 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
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

1) In the Institutional arrangements section and elsewhere as appropriate, please clarify what the Centers of Excellence entails (Activity 1.1.5.3). The text (para44) notes research and development for the reduction of u-POPs and GHGs and marine litter and later notes it will track progress of the pilot projects (para 51). To what extent will the COE provide R&D related to the entire value chain of plastic?

2) Please clarify the mission of the 'Resource Recovery Secretariat'. From the name it suggests it will focus only on waste management; whereas the project is intended to tackle the full life cycle of plastics.

3) Please clarify how NPAP relates to these entities.

Agency Response 1) The Circular Economy Center of Excellence (CECE) aims to support the commercialization of circular economy technologies along the plastic value chain in Ghana. Ghana aims to become a global leader in a just transition to circular economy and has made significant progress in advancing the circular agenda in the area of plastics and plastic waste. As part of the institutional framework of Ghana's NPMP, a Resource Recovery Secretariat (RRS) will be established under MESTI to support implementation of NPMP, including guidance to the allocation of public resources towards different interventions. The RRS will be responsible and dedicated to the achievement of the Policy's aim and the fulfilment of 17 Strategic Actions to be taken by public entities ranging from Ministries, Agencies to the Parliament, laid down in the Policy's Implementation Plan.

During the PPG phase of work, technologies to dispose of non-recyclable plastics/hard-to recycle plastics/POPs containing plastics in an environmentally sound manner within the country could not be identified. It was proposed in the project that a Center of Excellence be established under the RRS to help identify potential technologies that could be used to address this gap. A list of possible technologies to investigate such as pyrolysis, bacterial decomposition and irradiation were proposed, however, in line with GEF guidelines, pyrolysis for a plastic-to-fuel system will not be funded.

In consultation with MESTI, the role of the Center evolved beyond the original intention of addressing hard-to-recycle plastics to include piloting and scaling up technologies for innovation in circular plastics technologies and circular economy in general. Making sure data from these pilots is available would help the Government develop responsive circular economy policies and de-risk paradigm-shifting technology in the circular economy space to crowd in investment in order to bring these technologies to commercialization.

2) The mission of the RRS is outlined in the attached Annex X: Resource Recovery Secretariat Initial Structure and Staffing as produced by MESTI. This is a specialized

unit within MESTI/EPA to be established and dedicated to the management of the whole life cycle of plastic in Ghana.

The RRS will also consult and coordinate its activities with stakeholders through bi-lateral arrangements and through the NPAP platform to ensure activities and instruments related to plastics and circular economy will benefit from broad stakeholder engagement based on international best practices. The establishment of the RRS is a key pillar of the NPMP. Under Focus Area 4: Good Governance, Inclusiveness & Shared Accountability, Strategic Action 4.2. seeks the Establishment and Operationalization of the Resource Recovery Secretariat. The RRS will:

- ? Increase collaboration between the public-, private- informal-, and civil-society sectors, and between regions, cities and towns.
- ? Conduct strategic planning and accountability of this NPMP starting at the national level and adopted and localized at the regional and local levels and within industry and institutions; and
- ? End ad hoc reactionary approaches to plastics management in Ghana;

The MESTI will act as the coordinating Ministry, establishing and directly supporting and overseeing the Resource Recovery Secretariat created in this Policy, which is mandated to ensure the efficient and effective achievement of this Policy's aim and all Strategic Actions detailed within, including holding all identified actors accountable.

As stated in the NPMP:

?A Resource Recovery Secretariat will be established to provide a centralized point of agency for the achievement of this Policy, its Strategic Actions and any other programmes or activities that may be inspired by it. A Secretariat is necessary to overcome the ?fall through the cracks? syndrome that is globally characteristic of plastics management, as a widely cross-cutting issue.?

3) The NPAP has a critical role to play as the main convener of stakeholders along the plastic value chain within Ghana. This convening role is highlighted by the various meetings the NPAP holds including Steering Board meetings which guide the activities of the NPAP, Technical Committee meetings which provide technical oversight and guidance of proposed activities of the NPAP, Task Force meetings which provide highly granular inputs and advice about NPAP activities and Expert Panel meetings which draws upon local, national, regional and international experts to provide independent advice to the NPAP about project activities. The NPAP has produced a number of relevant reports and documents which the RRS will consult for guidance as it

implements the NPMP. These resources, (Baseline Analysis, the Gender Action Plan, the Action Plan and the Investment Roadmap) all help inform the RRS activities on circular economy and plastic within the country. In addition, the RRS can specifically request the NPAP to engage NPAP platform members on specific issues. If, for instance, the RRS formulates a specific circular economy and plastics policy to fulfill objectives of the NPMP the NPAP platform can be used to seek feedback from stakeholders as part of the consultation activities undertaken by the RRS

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

Secretariat Comment at CEO Endorsement Request

(Karrer, Nov 26, 2021). Yes.

(Karrer, Oct 13, 2021). No.

Thank you for highlighting connections to the GCLME. However, please clarify how the projects relates to the GCLME SAP. Please reference the SAP ([gclme_sap_2007\[1\].pdf](#)), specifically the importance of addressing marine debris/litter/plastic (see section 3.1.4 Pollution), which is important to justifying IW funding.

(Karrer, July 23, 2021). No.

With regard to alignment with the IW focal area, the transboundary nature of the project needs to be indicated. Please indicate how the project supports the GCLME Strategic Action Program (e.g. pollution concerns in the region). In the explanation of Component 4, the Knowledge Management section, and the Relevant GEF Projects section, please indicate the project will consult with and share insights with the Guinea Current Large Marine Ecosystem project.

Agency Response

Relevant paragraphs have been updated with reference to the GCLME and the sharing of knowledge and information. Component 3 (Para 70), Component 4 (Para 72), Alignment with GEF Focal area (Para 78) and Knowledge management (Para 130).

Para 78 has been updated with additional context about how the project will support the GCLME SAP.

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

Secretariat Comment at CEO Endorsement Request
(Karrer, July 23, 2021). Yes.

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
(Karrer, July 23, 2021). 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
(Karrer, July 23, 2021). Yes.

Agency Response

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
(Karrer, July 23, 2021). 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

(Karrer, July 23, 2021). Not a child project.

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

(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

While the stakeholder engagement document provides well-articulated plans for engagement, it does not include the full spectrum of stakeholders. Implementing a circular economy approach requires working with stakeholders along the entire value chain. Doing so ensures that the producers of products are designing for reuse or recycling. It also ensures key players, such as the cashiers at grocery stores, are aware of measures such as bans on plastic grocery bags. Relatedly, the government agencies responsible for these sectors need to be involved. Consequently, the main types of plastic products (e.g. grocery bags, food wrappers, drink bottles, etc) need to be considered and the relevant stakeholders engaged. Please review the project plans and consider who would be required to be involved to ensure success and add them into stakeholder engagement plans.

Agency Response

Additional stakeholders have been added to the stakeholder engagement plan and the updated stakeholder engagement plan has been reattached as an Annex. The additional stakeholders added include:

- ? Ghana National Chamber of Commerce & Industry
- ? Food and Beverage Association of Ghana
- ? Chefs Association of Ghana
- ? Ghana Chamber of Young Entrepreneurs
- ? Ghana Hotels Association

? Food and Drugs Authority

In addition, the stakeholder engagement plan now provides additional details about ongoing recruitment and engagement of stakeholders. Specific reference is now made to stakeholders along the plastic value chain and within the circular economy framework.

Para 99 has also been updated to explain that the stakeholder list will be revised and validated during the inception phase of the project.

Critical to the stakeholder engagement plan is the relationship with the NPAP. As the stakeholder convening platform in Ghana, ongoing participation in the NPAP by MESTI and UNIDO will ensure that stakeholders are informed of project activities and support to reach marginalized stakeholders can be sought from the NPAP.

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

(Karrer, Oct 13, 2021). Yes; however, once the role of women has been assessed as noted in activities 1.1.2.2 and 1.1.4.11, the project needs to adapt to help address inequities, ensure fair treatment and even empower women through circular solutions to plastic pollution.

(Karrer, July 23, 2021). No.

A thorough and impressive gender analysis was conducted with insightful findings. That said, the analysis focused on the roles of gender along a linear plastic economy (figure on page 5, Annex R). The analysis focused on the role of women as sources (importers of pellets of virgin and recycled plastics and finished products), producers, manufacturers, distributors, plastic waste generators, plastic waste managers, plastic waste pickers, plastic recyclers, and plastic exporters (recycled pellets and finished products). The project will be working toward circular economy solutions. Therefore, it's important to understand the role of women (both as consumers and stakeholders) in these circular solutions - developing alternative materials, redesigning products and services for circularity, and fostering reuse/resale/repair/ etc. Given in many developing countries repair and resale markets are large, there may be a significant opportunity to scale-up these activities with benefits to women. These aspects need to be addressed to inform the project plans.

Agency Response

The Gender Action Plan has been updated to reflect opportunities for women along the plastic value chain. Given the lack of understanding of the role of women in circular solutions, Activity 1.1.2.2: Undertake an assessment of upstream circular economy business models will examine the role of women within reuse/refill business models and how they can be supported during the transition to a circular economy. Activity 1.1.4.11 Develop policy and regulatory proposals to incentivize reuse systems will investigate specific reuse/refill policies that can support women.

Para 102 has been updated.

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

(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No. See points related to stakeholder engagement question.

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

(Karrer, Nov 26, 2021). Yes.

(Karrer, Oct 13, 2021). No.

The implications of COVID is required for all projects as the GEF is trying to understand the implications for our portfolio of projects and, therefore, measures we need to rethink going forward.

While it is understood that detailed studies are not possible, a basic understanding of the status of single-use-plastic during COVID should be possible, including whether for example restaurants switched to SUP, whether customers used more plastic bags at grocers, whether recycling and waste collection services continued, whether any new regulatory or policy opportunities arose (e.g. plans for reopening better and greener post-COVID). A general sense on these points are hopefully possible from colleagues at MESTI and other partners in Ghana.

(Karrer, July 23, 2021). No.

While the CER explains the risk to project processes, such as training, and to the team, it does not consider how COVID-19 has and is expected to impact the goals and activities of the project. For example, in many countries, COVID-19 has led to a surge in disposable PPE (e.g. masks, gloves) and single-use packaging in the food sector (e.g. disposable take-out containers, utensils, cups, bags, wrappings). In some countries existing regulations (e.g. plastic bag bans) have been retracted and recycling collection stopped. The result is a furthering of the plastic crisis. COVID-19, however, is also a unique opportunity as governments have had to adapt policies and businesses have had to redesign operations. These changes, including during reopening, allow for the inclusion of new measures to foster circular practices. For example, when providing grants to help restaurants reopen, they could be required to serve on reusable dishware. The CER needs to discuss the COVID-19 situation in Ghana as it relates to the project ? the existing and expected impacts as well as opportunities and how the project will tackle the challenges and embrace the opportunities.

Agency Response

The data collection for the mass flow and baseline analysis began early in 2020 and therefore data specifically related to the increase in plastic waste/medical waste was not specifically noted within the country. Data related to the real-time quantities of plastic waste generated would be impractical to capture and specific attribution of plastic waste to COVID-19 would require detailed field surveys and waste audits. The Ghana Statistical Service conducts the Ghana Living Standards Survey and collects household level data on waste and waste management activities throughout the country and was used to project future plastic waste generation within the country. Activity 1.1.4.11 Develop policy and regulatory proposals to incentivize reuse systems will assess policy restrictions implemented during the COVID-19 pandemic on these types of systems and propose policies to overcome restrictions. Activity 1.1.1.4: Conduct capacity building of actors within the plastics and circular economy sector including informal sector also includes specific COVID-19 related capacity building activities to ensure proper management of medical waste.

Para 106 has been updated with a more detailed explanation of the impact of COVID-19 in the country.

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
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

As noted in the GEBs section, please ensure collaboration with the GCLME.

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
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

The project is designed to support the NPMP. Perhaps redundant, but would seem the NPMP should be included in the National Priorities section.

Agency Response

The national priorities section now includes the NPMP.

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
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

As requested in the PIF comments, please edit Output 3.3, which is focused on ?promoting? the project, which implies one-way, when the intent is to share experiences and lessons learned, which is two-way.

The collaboration with GPAP and IWLEARN is great. As noted in comment above, please ensure sharing with GCLME too.

Agency Response

Outcome 3.3 has been updated to 3.3. Knowledge management set up to share project information and knowledge locally, nationally and globally. GCLME has also been updated.

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
(Karrer, July 23, 2021). 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
(Karrer, July 23, 2021). 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
(Karrer, July 23, 2021). Yes.

Agency Response
Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request
(Karrer, Nov 1, 2021). Yes.

(Karrer, Oct 29, 2021). No. From PPO - Please populate the ANNEX A: PROJECT RESULTS FRAMEWORK ? it should include all GEF Core Indicators and appropriate targets.

(Karrer, July 23, 2021). Yes.

Agency Response
The project results framework has been updated with the GEF core and sub-indicators and targets.

Project Results Framework

Secretariat Comment at CEO Endorsement Request
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No. Please see previous comments.

Agency Response
GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request
(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

The request in the PIF review to include policies that address the full suite of circular economy approaches, including reuse options, is not addressed as noted previously.

Agency Response

Council comments

Secretariat Comment at CEO Endorsement Request

(Karrer, Nov 26, 2021). Yes.

(Karrer, Oct 13, 2021). No. While the additions are appreciated, the text does not indicate what is meant by the BRS-1 project and by "the BRS may need support in moving certain aspects of the project forward." Please clarify in the PIF.

(Karrer, July 23, 2021). No.

In the response to Norway's comments, it is mentioned that the project will assist Ghana in implementing its obligations under the Basel amendments, which have the objectives of enhancing the control of the transboundary movements of plastic waste. From reading the project activities, it is not clear how this aspect will be addressed. Please clarify.

In response to Norway's final comment asking that the role of the BRS be more clearly specified, please state the role in the CER.

As noted by the USA comments, the role of the NPAP relative to the RSS needs to be stated in the CER perhaps in the institutional arrangements section. Please clarify where it is added.

Agency Response

Norway

Activity 1.1.4.1 has been amended to include implementation of recommendations under the BRS-1 project. Based on consultations and engagement with the BRS team, it was concluded that the BRS may need support in moving certain aspects of the project forward. The Activity seeks to ensure any remaining work is continued. In response to Norway's final comment asking that the role of the BRS be more clearly specified, please state the role in the CER.

The CER has been updated in Para 49.

USA

The CER has been updated in Para 50 to address the role of the RRS and the NPAP. NPAP remains the main stakeholder convening body within Ghana on plastics and plastic waste and plays an important role by providing the RRS and MESTI with advice on plastic management as contained in the Baseline Analysis, Gender Action Plan, Action Roadmap and Investment Roadmap.

Activity 1.1.4.1 has been updated to provide more information about the support intended for the BRS-1 project.

STAP comments

Secretariat Comment at CEO Endorsement Request

(Karrer, Oct 13, 2021). Yes.

(Karrer, July 23, 2021). No.

The STAP comments were addressed except the following points. It may be worth contacting STAP colleagues, particularly Sunday Leonard (SundayLeonard@un.org), to discuss.

- 1) STAP welcomes the concept of the circular economy; however, the business and finance model that will be used to implement the concept need more elaboration. The issue of business and finance models for the circular economy has been of interest in the private and public, as well as in the academic arena. STAP refers the project proponents to some relevant resources on the topic: The EIB Circular Economy Guide

(https://circulareconomy.europa.eu/platform/sites/default/files/the_eib_circular_economy_guide.pdf); Goovaerts et al. 2018 Financing innovation and the circular economy (https://link.springer.com/content/pdf/10.1007%2F978-3-319-66981-6_47.pdf); and Circular economy finance guidelines (<https://www.ing.com/web/file?uuid=bb60f278-9508-440f-b5f5-f4568f50a789&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=43933>).

- 2) Output 1.1.5 will focus on the creation of ?a secretariat/national commission for plastic pollution.? While the current funds from this project may be sufficient for creating the secretariat, it is unclear how the secretariat will be sustainably funded after the end of the project. A model for achieving this is important for the sustainability of the project.

Agency Response

1) STAP comments are addressed in Annex M under Activity 2.2.1.3 and 2.2.1.4. These activities seek to not only assess the economic and environmental effectiveness and efficiency of the pilot demonstrations projects but also seek to develop the required financial mechanisms that must be present within the country in order for circular economy business models to thrive and survive. Part of the role of the Center of Excellence will be to track and monitor data about the pilot projects in real time The data collection efforts will enable the government to develop responsive policies which further support circular business models.

2) As outlined in Para 50 and Activities under Output 1.1.5 specific aspects of RRS will be set up using GEF funds. As a key pillar of the NPMP, the long-term funding of the RRS will come from the regular Government of Ghana budget (directed through MESTI) and through the collection of funds from the Plastic Waste Management Fund.

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

(Karrer, July 23, 2021). Yes.

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 (Karrer, July 23, 2021).
Yes.

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

(Karrer, Nov 26, 2021). Yes.

(Karrer, Oct 13, 2021). No. A few issues remain.

(Karrer, July 23, 2021). No. While a strong project and CER, there are several issues that need to be addressed explained above.

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	7/30/2021	
Additional Review (as necessary)	10/13/2021	
Additional Review (as necessary)	10/26/2021	
Additional Review (as necessary)	11/1/2021	
Additional Review (as necessary)		

CEO Recommendation

Brief reasoning for CEO Recommendations