

# AFLDC-2 Scaling-up Investment and Technology Transfer to Facilitate Capacity Strengthening and Technical Assistance for the Implementation of Stockholm and Minamata Conventions in African LDCs

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10218

**Countries**

Regional (Africa, Angola, Ethiopia, Gambia, Guinea, Liberia, Mauritania,  
Senegal, Sierra Leone, Togo, Uganda, Zambia)

**Project Name**

AFLDC-2 Scaling-up Investment and Technology Transfer to Facilitate  
Capacity Strengthening and Technical Assistance for the Implementation of  
Stockholm and Minamata Conventions in African LDCs

**Agencies**

AfDB

**Date received by PM**

12/13/2020

**Review completed by PM**

4/19/2022

**Program Manager**

Satoshi Yoshida

**Focal Area**

Chemicals and Waste

**Project Type**

FSP

**PIF**   
**CEO Endorsement**

**Part I ? Project Information**

**Focal area elements**

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

**Secretariat Comment at CEO Endorsement Request**

SY, Jan 8, 2021: Yes, with changes from the PIF. However, please see comments on the alternative scenario section.

**Agency Response**

**Project description summary**

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

Secretariat Comment at CEO Endorsement Request

April 19, 2022: Comment cleared.

March 29, 2022: Start and end dates are missing on the resubmission. Please add information on the portal entry.

SY, Jan 8, 2021: There are some changes in the structure of the project from the PIF. Please see comments in alternative scenario and GEBs.

Agency Response

16 April 2022:

Done. Start and end dates have been added to the portal. The expected start date is 1st August 2022 and correspondingly, the expected completion date is 30 July 2027.

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

Secretariat Comment at CEO Endorsement Request

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

April 19, 2022: We note the responses. Please ensure that AfDB mobilizes other co-financing at the implementation stage. Please also note that obtaining co-financing letters is not a role of UNITAR, but a role of GEF Agency.

March 29, 2022: We note further changes on the total amount of co-financing as they are narrowed down to those directly relevant to the project.

1. We note co-financing letters from two organizations as well as AfDB. Co-financing letters from AfDB can be issued by AfDB while other letters should be issued by respective co-financiers. Please obtain and upload correct co-financing letters.
2. As some co-financing letters are missing, it is difficult to verify the categories and types of co-financier (as well as investment mobilized). AfDB co-financing on Sierra Leone has two same co-financing type (both are grant).
3. Please also correct the ratio of co-financing amount to components and PMCs to those of GEF amount (PMC co-financing must be around five percent of co-financing of Components, which is the ratio of GEF funding).

Nov 1, 2021:

1. Not addressed. Please upload all co-financing letters.
2. Not addressed. Annex N is not relevant here. Please explain the changes from PIF on co-financing.
3. and 4. Not addressed. Please fix.

SY, Jan 8, 2021:

1. Please upload all the co-financing letters or equivalent. Please clarify the nature of co-financing and linkages with project components, including component 3 under the relevant section of the CEOER.
2. Please provide descriptions on major changes from the PIF stage. Please explain why the total co-financing decreased and how the project will cover the decrease of co-financing to achieve the objectives of the project.
3. Some types of co-financing are inaccurate on the portal. Please fix them (e.g. Donor Agency, not GEF Agency). Some recurrent expenditure co-financing may be in-kind instead of grant. Please review the type of resources.
4. Descriptions on? how any "Investment Mobilized" was identified? are the same as in PIF. Please update them.

## Agency Response

April 25, 2022:

AfDB will ensure that the additional co-financing is mobilised during project implementation.

16 April 2022:

All co-financing from the AfDB baseline investment projects that do not directly come from the AfDB have been removed. As such, the project's co-financing underwent

further adjustments (reductions). The reason for this is not because the co-financing would not contribute to the incrementality for the proposed GEF activities, but rather because the co-financing from these financiers is not yet fully confirmed at this stage. However, it is expected that much of this co-financing will be confirmed during the implementation of the proposed GEF project. Furthermore, due to the planned activities on financial mechanisms and the engagement with financial institutions, under component 1, the mobilization of additional financing, that would also contribute to the achievement of additional GEBs, is also expected during the project implementation. The confirmed co-financing at this stage is all the financing that comes directly from the AfDB through loans and grants, which should still meet the co-financing requirements for projects under GEF-7.

Furthermore, while it was not a requirements for UNITAR to generate additional confirmed co-financing during the PPG for project implementation, they did obtain commitments from two national stakeholders (Ethiopia and Sierra Leone). They did this, even though it was not a requirement for the project as the AfDB had already mobilized significant and appropriate co-financing for the project. However, to demonstrate the additional commitment from the national stakeholders willing to provide co-financing, the AfDB has decided to include the two co-financing letters.

1. It is correct. However, it is more practical to merge the two grant amounts from the ADF for Togo, which we have now corrected in the portal.
2. Done. The co-financing amounts were first adjusted to only include financing from ADB and ADF. Following that, the ration for PMC was adjusted to match the five % ratio of GEF funding.

10 March 2022:

1. Co-financing letters have been uploaded
2. Following further consultations and analyses the co-financing has been recalculated to include only directly relevant co-financing contributions from the baseline. The revision was made based on GEF feedback that co-financing should be tighter linked to directly relevant baseline project sub-elements. The revised figures are based on the newest assessment of co-financing contributions from the co-financing AfDB baseline projects; the details are given in the CEO doc's section on incremental reasoning.
3. This has been corrected.

4. Kindly see the relevant section of the CEO Endorsement document / portal for the revised and updated details

Sept 20, 2021:

1. The links between co-financing (?baseline?) projects and project components are now described in the CEOWER section 5) Incremental/ additional cost reasoning and expected contributions from the baseline, the GEFTF, LDCF, SCCF, and co-financing (and in the country annexes)
2. The changes since the PIF phase are outlined in Annex N ? changes since the PIF.

**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  
SY, Jan 8, 2021: Yes. Please see comments on co-financing.

Agency Response  
**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  
April 19, 2022: Comment cleared.

March 29, 2022: Please include the table in the main portal document.

Nov 1, 2021: Not addressed yet.

SY, Jan 8, 2021: Not yet. Please upload the Annex C.

Agency Response  
16 April 2022:

This has been done.

10 March 2022:

Annex C has been uploaded

**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**

April 19, 2022: While noting the updated costing and some reasoning, it is required that the project conducts detailed costing assessments (including disposal and shipping costs) by the time of inception of the project and that the PIRs and MTR must include updated costs.

March 29, 2022: Please confirm that information sources in the Annex AB are based on the latest NIPs or other information (where not applicable), including on PCBs. Please explain how the changes of types of POPs will impact the overall project objective. Given the new set of GEBs, the costs of disposal are outside of the range of 1-2\$/kg, which other projects meet. Please provide justifications on this.

Nov 1, 2021: We note the GEBs increased from the previous submission and basis for GEBs estimation on Annex AB while some agrochemicals are removed. However, the core indicator sheet and the portal entry are not the same. Please correct. Also, 326.30 tons of POPs listed does not have a classification. Please amend. Please also clarify the quantity of POPs pesticides that are not confirmed as POPs yet.

SY, Jan 8, 2021:

1. The total GEBs on indicator 9 decreased by more than 45 percent while maintaining the amount of the GEF funding. Please consider increasing the targets by reformulating the outputs of participating countries with national priorities, utilizing co-financing resources.
2. There are many discrepancies in GEBs in Annex AB and the CEOER on the portal. For example, indicator 9.2 has mercury reduction of 38 tons in total in all 11 countries while the result framework and country sheets indicate only 2 countries will participate in output 3.5, which is described to achieve 57 tons of reduction. There are some cases with no GEBs by investments while there are some investment activities in the countries.

Agency Response

April 25, 2022:

AfDB will ensure that a detailed costing assessment (including disposal and shipping costs) is undertaken at the inception stage of the project implementation and that PIRs and MTRs will include updated costs.

16 April 2022:

In the CEO Endorsement document, the cost of disposal for POPs (PCBs and Obsolete POPs Pesticides) through high temperature incineration has been adjusted to 2\$/Kg to reflect the current going rate for final treatment at incineration facilities in Europe (which are the most likely destinations because of proximity). However, this cost excludes associated costs such as international transportation, inventories, laboratory analysis, repackaging, local transportation, temporary storage, transboundary movements, training and capacity which have been reprogrammed separately.

Typically, the procurement of international disposal services involves the contracting of a specialized international company that assumes all the responsibilities and risks associated with the transportation of such hazardous materials. The contracted company will be responsible for accident insurance, notifications to responsible authorities, bank guarantees, etc. The contracted company will also be responsible for transportation and delivery to the incinerator for final disposal including payment of the associated fees. Based on the gathered data and consultations with countries and disposal companies, the ratio between transportation/shipping costs versus the direct disposal cost is 2:1. However, due to some variables, such one stated below, we have taken a more conservative approach and averaged this ratio to 1:1 for all countries. This is mainly due to the fact that we anticipate the PCBs and obsolete POPs Pesticides to be already packed in UN approved drums and will not require further repackaging by the contractor.

Transportation costs typically include the following elements:

Local costs:

1. Staff costs for the transporting company and profits.
2. Procurement of PPE and other resources such as first aid kits, etc to facilitate the disposal operations



3. Hotel accommodation and local transportation for the international disposal team of experts
4. Hiring and training local support staff in the safe handling of the POPs waste
5. Organizing media briefings
6. Selecting the national central transfer station
7. Collection of the POPs wastes from different temporary storage facilities across the country
8. Hiring of licensed hazardous material transporters for in country transportation
9. Training the drivers in hazwaste transportation techniques
10. Conducting risk assessments for potential transportation routes
11. Organizing security escort for inland transportation
12. Procurement of UN approved drums and repackaging the materials into these drums
13. Decontaminating the temporary storage facilities
14. Logistics such as securing the maritime containers
15. Etc

International costs:

1. Insurance and bank guarantees
2. Shipping costs
3. In land transportation from port to the final
4. Etc.

Further, the costs vary from country to country. However, the current high fuel costs make it difficult to accurately predict based on past experiences since the cost of most of the activities will be impacted. Therefore, we have tried to be a bit more conservative with our estimates.

Further, we believe that it is important to note that Angola, Liberia, and Sierra Leone have not implemented GEF projects before. Therefore, this project will also be used to

establish and strengthen foundational activities such as the review of the training and capacity building, strengthening institutional capacities and coordination, reviewing, and strengthening regulatory enforcement and compliance, awareness, training, and capacity building etc. This will require additional financing.

Disposal technology:

For POPs pesticides: after the inventories have been concluded, disposal options will be evaluated nationally and regionally. In most cases, the environmentally sound option is high-temperature incineration abroad. Procurement of these services will be conducted by the relevant regional centre, through an international tender following the AfDB procurement procedures.

For PCBs: During the implementation of the project, after the inventories have been concluded, PCB disposal options will be assessed to determine the most cost effective and environmentally acceptable method of disposal. In most cases, the environmentally sound option is high-temperature incineration abroad. Procurement of these services will be conducted by the relevant regional centre, through an international tender following the AfDB procurement procedures.

For mercury: First national interim storage of Hg will be undertaken in the applicable countries. Following that, mercury will be exported to be stabilised/converted and confined in a dedicated final storage facility. As the quantities per country are generally small, the exact costs will need to be determined during implementation.

We confirm that the information sources in Annex AB is based on the latest information available to the preparation team, currently. It is not believed that the changes of types of POPs will impact the overall project objective. This is because direct replacements were made in the GEBs. The activities to be undertaken in country were carefully selected based on the NIP/MIA priorities, current national priorities, the relevant national baseline situations, and the ability to generate the greatest amounts of GEBs.

10 March 2022:

Numbers in portal were revised and amended, among other to align with Annex AB.

Sept 20, 2021:

1. Outputs by country have been redefined to increase GEB for indicator 9 significantly to 85% of the PIF, including with changes in allocations for Component 3 outputs and cuts in fee rates anticipated. Recent information demonstrates that elimination costs for POP pesticides have increased drastically during COVID-19, particularly for moderate quantity contracts. Hence, these price estimates could not be lowered in the budget. Procurement of POP elimination services is planned to be done regionally to secure acceptable prices. The changes can be seen in the Core indicator worksheet (GEBs) and in the country annexes budgets (funds allocation). The changed GEB are also shown several places in the CEOER.
2. GEBs were corrected in the CEOER, in the Core indicator worksheet and in the results framework (annex A)

## **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

March 29, 2022: Comment cleared.

Nov 1, 2021: We note the updated ToC while barriers on ToC and challenges here may not match. Please explain.

SY, Jan 8, 2021: While many relevant barriers are described, how the project address such barriers is not clear in this section and the other parts of the CEOER document.

### Agency Response

10 March 2022:

Challenges/barriers were checked, and TOC revised to capture additional challenges listed in CEOER barriers list; note that TOC challenges summarise several barriers from CEOER list.

Sept 20, 2021:

Description in the CEOER has been improved and the TOC revised with more details and explanations.

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

Secretariat Comment at CEO Endorsement Request

Nov 1, 2021: We note table 3 - regional and international baseline projects. In terms of AfDB's projects, see the comment in incremental cost reasoning section.

SY, Jan 8, 2021: Please include regional and international baseline projects relating to POPs and mercury reductions, on top of country-specific baselines. Co-financing baseline projects described in this section are not directly related to POPs and mercury reductions and linkages with the alternative scenario (in the portal and in country annexes) are not clear.

Agency Response

Sept 20, 2021:

Regional and international baseline projects have been updated with recent projects, including WB projects, see Section 2) Baseline scenario and any associated baseline program/projects, Table 3.

As regards the AfDB co-financing projects, several Component 3 outputs have been changed to coordinate closer with baseline projects (for example, Output 3.1 has been omitted for Senegal and Zambia), and links descriptions have been checked and improved, as feasible, see Section 5) Incremental/ additional cost reasoning and expected contributions from the baseline, the GEFTF, LDCF, SCCF, and co-financing.

**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

April 19, 2022: Comments cleared.

March 29, 2022: While noting the responses on 1 including involvement of some stakeholders, please add in the document how the project will ensure financial mechanisms to be designed/established outside co-financing, which will be further elaborated in the initial stage of the implementation. (co-financing ratio and letters are not relevant in the question). Other previous comments cleared.

Since the time this project has been PIF approved, there have been several projects on mercury containing products that includes projects in Africa. Please ensure that there is no overlap and that activities are coordinated and learn from each other.

Nov 1, 2021:

1. While noting the responses, financial mechanisms should be expected at CER stage. Please provide indicative information.
2. We note improved ToC. There are some questions such as D2, D3 and D4, which seem not directly relevant. Please also see the comment above on challenges.
3. Comment cleared.
4. Comment cleared.
5. Comment cleared. We note that output 3.1 will contribute to GEBs from Ethiopia.
6. Comment cleared.
7. Comment cleared.
8. While noting the responses, it is not clear the rationale of changing 3.4b entirely. Please clarify.
9. Comment cleared.

SY, Jan 8, 2021: The proposed alternative scenario needs modifications and clarifications for further assessments.

1. Overall comments: It is not clear how the project will scale up investments and technology transfer, as the project title describes, including through financial, and regulatory and enforcement mechanisms while few outputs include public/private financial schemes. The linkages between components (e.g. 1 and 3) and between outputs within component 3 are not entirely clear or strong although there are some descriptions in this section. Clarifications are needed on co-financing to support each output, in particular investments under component 3 (or under a section of co-financing contributions). Activities in the country annexes do not match the overall descriptions of outputs in the portal with several discrepancies (e.g. Gambia is included in output 3.1 in annex while the main document does not include.).
2. ToC: There are three ToCs but they are almost identical. Unless there are significant differences among targeted POPs and mercury, please merge them in a single ToC. Barriers should be aligned with root causes that will be addressed by this project including lack of financial incentives. ?LDCs need support? is not a barrier. There should be linkages between components 1-3 as opposed to stand-alone components and outcomes.
3. Component 1: It is not clear how the project facilitates enforcement of laws and regulations to reduce POPs and mercury emission in particular where countries already have them. It seems that the interventions of this component are not adequate to achieve the objectives. While EPR is referred, no specific activity is described (throughout the document). While the PIF included ?enhanced mechanisms for the take up of BAT/BEP,? it is not clear how the project will enhance such mechanisms throughout the CEOER. Output 1.2 and 1.4

describes trainings but they will not be sufficient to address the underlying issues related to POPs and mercury releases. Output 1.3 seems a stand-alone output and it is not clear how this output will lead to reduction of POPs and mercury emissions outside the project.

4. Component 2: Please provide a rationale why outputs 2.1 and 2.2 are separated from outputs 1.2 and 1.4 and clarify if there is no overlap. Output 2.3a covers broader activities including reduction or alternatives to POPs pesticides while relevant outputs under component 3 have only waste and obsolete stockpile destruction and it is not clear AfDB projects will help participating countries utilize this output and achieve the objectives (which also applies to other outputs). Output 2.3c and 2.3d may have some overlaps with output 3.4. Output 2.4 needs to prioritize approaches and targets to increase the effectiveness and focus on mobilizing these stakeholders rather than heavy spending on communications.
5. Output 3.1: Please clarify how much and which GEBs will be generated by this output within and outside the project. Please also clarify what measures will be placed to ensure stored targeted chemicals in interim transfer stations will be environmentally safely disposed or destroyed and how these chemicals will be transported safely from which sources. How the project will mobilize investments including co-financing to build such facilities is not clear. Also please elaborate the relationship between this output and other outputs under component 3 (there is a description on a linkage in some countries between 3.1 and 3.2). This is a stand-alone activity solely focus on the interim storage and will be conducted only three countries (plus two other countries for short-term storages). Please explain if other countries have already such facilities for sound disposal of hazardous chemicals.
6. Output 3.2: Please explain why Senegal is not included in this output while the output 3.1 includes Senegal, and the destruction itself will be not conducted in Zambia (Senegal has only output 3.1 for investments.). In order to secure safe disposals, the section should establish a mechanism throughout the chain of the hazardous chemicals covering from the collection to the final disposal. Transboundary transport of hazardous chemicals may need further safeguards and a tracking system to safely dispose with certainty. Please clarify if wastes this output deals with include chemicals controlled under the Bamaco Convention. Please provide indicative/potential locations for final disposals if they will be conducted outside the concerned countries. Although Civil Society and other stakeholders are mentioned to oversee the national inventory, some are not listed in the country specific stakeholder engagement plans.
7. Output 3.3: While there are descriptions that PCB-contained products may be used for other purposes due to their economic values, it is not clear how the project address them through financial or regulatory schemes to ensure PCB-contained products will be securely collected with a detailed plan. Please include establishing a safeguard mechanism in this output to ensure the safe and secure transportation, dismantle/treatment, and destruction/disposal of

PCBs and their wastes avoiding accidents, leakages and contaminations. Please provide indicative/potential locations for final disposals. Please explain how the project ensures the transport of PCBs and their wastes will be in compliance with the Basel, Bamaco and other conventions and international rules.

8. Output 3.4: (a1) In general costs of producing plastics from wastes are higher than ordinary plastics, on top of costs of collection and transportation. Please describe a financial mechanism to ensure the recycled plastic production will continue after the project. (a2) Collection of recyclable plastics will not be easily achieved without proper waste management system in the concerned countries where separation of waste is not a practice at household and other levels. Therefore, it is important to clarify how the project will identify cities to intervene where some waste management systems already exist. Please explain how the project will improve the existing waste management mechanisms and be aligned with them. (b) Please clarify what kind of concrete investments will be provided for the promotion of alternatives to plastics as the current descriptions seem technical assistance for assessments.
9. Output 3.5: (a) Please clarify indicative targeted mercury products for investigations. (b) For hand-held XRF analyzers, the plan of enforcement of import/export restrictions should be integrated to the plan of provision of such equipment and trainings. Please clarify the linkage with component 1 in this regard. (c) How the project will safely collect, transport, and destruct/dispose mercury-contained products is not clear. The two countries participating in this output are not overlapped with countries participating in the output 3.1 while it is stated that collected mercury-contained products will be stored in interim transfer stations established by output 3.1. It is not clear if hospitals and relevant facilities will be included in the scope which may be a large source of mercury-contained products.

## Agency Response

16 April 2022:

We have added the following details to the alternative scenario to better clarify how the project will ensure the design/establishment of financial mechanisms, specifically component 1.

Under both activities (1.1a and 1.1b) financial mechanisms to support the continuous ESM of POPs and Hg will be promoted/designed/established. The nature and scope of the financial mechanisms for each country will depend on their social and economic circumstances. A range of options will be considered. These options may include market-based financial mechanisms and Command and Control (CAC) mechanisms.

Each country will undertake an assessment of policy instruments relevant to the ESM of POPs and Hg. The assessment will consider the relevant stakeholders, polluter pays principles, taxations, licensing fees, penalties, and other regimes. Options for achieving economic efficiencies will be prioritized. Subsequently, each country will undertake measures to strengthen the availability and demonstrate the viability of financial mechanism for the support of BAT/BEP to manage POPs and Hg. This activity will take place under component one.

The focus on financial mechanisms has been strengthened under output 1.4. to ensure that stakeholder engagement under the project and the regional sharing of experiences and lessons learnt include the design/establishment of sustainable financing mechanisms that support the implementation of BAT/BEP for the ESM of POP and Hg.

The project results framework was also updated accordingly.

Additional details were added to the section on coordinating with ongoing projects: At the onset of the implementation, the PMU will determine the opportunities for cooperation with all active projects project in the region related to POPs and Hg, that are relevant and will determine and ensure that there is no overlap, that relevant activities are coordinated and that lessons are shared.

10 March 2022:

Response to point 1 ?Indicative information on financial mechanisms: Output 3.4 (uPOPs reductions through recycling): In the country annexes, potential partners have indicated interest, though they have not been able to quantify co-financing at this stage (see details in annexes). Additionally, we have added in the O-3.4 task description (alternative scenario section) that we expect at least 50% co-financing. Output 3.1 (hazardous waste transfer station) and 3.3 (PCB elimination): We have requested co-financing letters from the partners and have been able to secure co-financing letters for Ethiopia and Sierra Leone. We note that we understand the GEF 1:6 co-financing ratio to be the overall goal ratio, and not necessarily applicable for each individual investment.

As regards financial sustainability/project exit strategy, a business plan will be developed with the Output 3.1 and 3.4 partners, and commitment to that business plan is a key criteria for selection of each partner.



As regards financial mechanisms that may benefit other actors in the sector in the countries (scale-up enhancement), a national lessons-learned report has been added. Its primary target groups will be national stakeholders in the same sectors, and it will focus on explaining the mechanisms applied in the demonstration project and their advantages (and what can be done better, if anything): Technical, financial, etc.

The frameworks developed/improved in Component 1 and the awareness raised in Component 2 will contribute to ensuring clearer and sustained business opportunities.

Additionally, key financing facilitators for SME have been added in among stakeholders to be consulted in each country implementing Output 3.4.

Response to point 2 - D2, D3 and D4 have been adjusted in TOC to make overall background drivers explicit.

Response to point 8 - The output number is incidental; besides being related to reduced open burning, the earlier and the new Output 3.4b are not related. As noted above, countries did not confirm interest in the old 3.4b (sustainable packaging materials). As regards the new Output 3.4b (energy recovery of otherwise non-recyclable plastics and rubber), this was developed based on expressed needs from Uganda (problems with insufficient waste tyres management) and Zambia (national proposal for a waste management solution including energy-recovery in cement plant) during the national consultations. The background for the change to cement facility activity is given in the UGA and ZAM annexes. Senegal also expressed need of additional capacity in this field.

Sept 20, 2021:

1. Scaling-up Investments and technology transfer will be a focus in the assessments of potential partners planned for the first phase of the FSP. In the CEOER, co-financing is among the selection criteria suggested for evaluation of private sector project partners to be engaged as part of assessments conducted in the project implementation

The description of linkages between components has been made more explicit, and the TOC has been revised to show links, see comments above.

As mentioned, the description of links to co-financing baseline projects has been reviewed, and output descriptions in the country annexes have been revised to match the CEOER.

2. The TOC has been revised to address review comments as described above. Note also that TOCs have been developed by country; see the country annexes.

3. Enforcement aspect is made more explicit and detailed in CEOER (See particularly the description of output 1.2) based on new country consultations where enforcement was one of the focus points. EPR is part of the toolbox that countries may wish to include in their improvement of legislation and enforcement. EPR is applied widely elsewhere but is relatively new in Africa. We have coordinated and improved the activities planned for Outputs 1.2, 1.3, 1.4 and Component 2.

4. All task descriptions were checked for overlaps and some adjustments made. Overlaps were removed in output descriptions sub-sections on Component 1,2 and 3. Component 1 and 2 outputs were adapted to reflect to the selected component 3 outputs (see Output overview tables in CEOER). For example, training PCB was emphasised only for in countries that have PCB elimination planned and similarly for other component 3 outputs. Budgets were cut accordingly. Budgets were adjusted to reflect current state of implementation closer than previously.

Output 2.4 budget was adjusted to more NGO/CSO- mediated outreach and less social media, and the budget was cut accordingly and significantly, freeing money for the POP GEBs. See text in Section 3 3) Proposed alternative scenario, Output 2.4.

5. Output 3.1 (a hazardous waste transfer station) will now only be implemented in Ethiopia, where there is a need for sorting out toxics like mercury prior to existing waste to energy operations. It will also be used for intermediary storage of POPs eliminated in the project. The transfer station enables elimination of the circulation of toxic chemicals in society (they can be delivered there), but does not in itself secure final destruction/treatment, which is a separate stage ensured by providing appropriate business models for securing final treatment. The handling of chemicals will be done in accordance with international standards as summarised in the CEOER and detailed in the ESSR (Annex L). Regarding the mobilization of investments, see other comments above. According to GEF GEB assignment rules, a GEB is not assigned to Output 3.1, but the measure is found crucial for proper societal management of toxic chemicals. For other countries where POPs/mercury elimination is undertaken in the project, only intermediary storage will be provided (project duration storage) prior to final treatment within the project. GEB assignment to outputs has been made more explicit in the Results Framework.

It has been clarified how output 3.1 relates to output 3.2, output 3.3 and output 3.5 and country annexes have been revised accordingly

Based on GEF SEC feedback, we have kept output 3.1 (hazardous waste transfer station) in Ethiopia only.

6. The Component 3 measure for Senegal has been changed to Output 3.4 on plastics waste recycling, in reaction to GEF SEC response and to fit better with the co-financing baseline project in the country (See Senegal Table in CEOER Section 5). As mentioned above, chemicals handled for Output 3.2, 3.3 and 3.5 will be handled safely according to international principles, including the Stockholm, Minamata, Basel and Bamaco Conventions, as summarised now in CEOER Section 3) and detailed in the ESSSR (Annex L). Final treatment/disposal options are now mentioned in the CEOER (Section 3, Output 3.3). National stakeholders, counting also relevant NGOs/CSOs will be included in the national PSC's from where they will oversee the chemicals handling undertaken. .

The description of ESM for POPs/mercury has been clarified in summary in the CEOER and in details in the ESSSR (Annex L).

7. Chemicals handled for Output 3.2, 3.3 and 3.5 will be handled safely according to international principles, including the Stockholm, Minamata, Basel and Bamaco Conventions, which is summarised now in CEOER Section 3 and detailed in the ESSSR (Annex L). Final treatment/disposal options are now mentioned in the CEOER (Section 3, Output 3.3).

8. Plastics recycling does exist in Africa for some plastics types, but the potential is deemed much larger than what is exploited currently. A key point is improving access to the downstream market, which the project will support with the planned conference/fair and for the individual facilities chosen. Criteria for selection of cities and project partners has been specified in the CEOER; see Section 3) Output 3.4 description. A detailed assessment of potential partners and existing recycling activities will be made as part of the project implementation, after which the individual Output 3.4 country projects can be implemented on an identified needs basis.

9. a) As regards the updated and improved mercury products inventory, it will focus primarily on the product types where data gaps were experienced in the individual MIA inventories (for example blood pressure gauges, local production of paints, etc. as listed in the CEOER, Section 3) Output 3.5. As regards products to be included in the collection activity, the Description in the CEOER has been clarified further; including for hospitals (the intention is not to make new full mercury-free hospitals ?

there is not enough budget for this - but to provide hospitals and other mercury waste owners a possibility for emptying their mercury waste stocks to eliminate this from the countries in question).

b) yes, they are integrated and this is clear in the text in Output 3.5 in the CEOER Section 3).. For countries that will have Output 3.5, the XFRs will be included in the training on market control campaigns for restricted products. For other countries, XFRs will not be part of this activity under Component 2. The import restrictions will be implemented nationally under Component 1 for countries that have not yet implemented this part of the the Stockholm and Minamata Conventions. have

c) As for points 6 and 7 above, the description of ESM of the mercury waste in the project has been clarified in summary in the CEOER, Section 3.5, and detailed in the ESSSR (Annex L).

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

Secretariat Comment at CEO Endorsement Request

Nov 1, 2021: Comment cleared.

SY, Jan 8, 2021: CW-EA is not directly linked and there is no funding from it.

Agency Response

Sept 20, 2021:

CW-EA was removed.

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

Secretariat Comment at CEO Endorsement Request

March 29, 2022: Comments cleared. Please see comments on co-financing.

Nov 1, 2021: There are many discrepancies on country tables compared with co-financing section and Annex AB, which need to be addressed, including:

Gambia: GEBs from Gambia is mercury and uPOPs only while the co-financing includes the reduction of POPs pesticides.

Guinea: GEBs from Guinea does not include POPs pesticides while the table includes POPs pesticides. Co-financing section says \$13.8 million of AfDB project while less than \$1 million is described.

Mauritania: GEBs from Mauritania does not include POPs pesticides while the table mentions. The numbers of co-financing section and the table do not match.

Senegal : GEBs from Senegal are on mercury and uPOPs. GEB targets include POPs pesticides and other POPs. Also, it is not clear the linkage with \$93 million of co-financing on the portal and this table (\$149.8 million total or \$4.2 million of studies).

Togo: Financing numbers do not match the co-financing of AfDB.

Uganda: Majority of the baseline project is about road rehabilitation and irrelevant to this project. The scope of co-financing should be narrowed down directly relevant to the project. Financing number do not match the co-financing of AfDB.

SY, Jan 8, 2021: Please use the most relevant baseline projects and scenarios based on the descriptions in the baseline scenario section. Some AfDB projects listed seem not relevant to the project's interventions such as a road project and it is not clear how it would contribute to achieving project objectives. It is not clear if contributions from AfDB projects are co-financing or baseline projects. Co-financing from other organizations are not described. Please complete.

## Agency Response

10 March 2022:

Gambia: co-financing includes all POPs and mercury (this has been made clearer in Table 10 of the CEO Endorsement document.

Guinea: Co-financing table has been adjusted

Mauritania: Table 14 has been adjusted. Co-financing table was adjusted

Senegal: Table 15 has been adjusted. Co-financing table was adjusted

Togo: Co-financing table was adjusted

Uganda: Table 18 has been supplemented to also mention that the AfDB baseline investment can increase incentives among all cement suppliers by demanding enhanced sustainability in their procurement of cement, thereby promoting scale-up; hence increasing relevance to AFLDC2 further. Co-financing numbers in table 18 have also been adjusted.

Sept 20, 2021:

Links to co-financing baseline projects have been reviewed, and the description of the project have been moved to Section 5 to make links easier to read.

The beneficiary co-financing aspect is listed among the criteria for selection of private sector partners based on assessment conducted in the project implementation.

**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

SY, Jan 8, 2021: Yes. However, please see comments on GEBs.

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

Nov 1, 2021: Comments cleared.

SY, Jan 8, 2021:

Innovation: Noting circular economy approaches are highlighted here, they are not necessarily emphasized or embedded in the entire document except output 3.4 of recycling plastics and using alternatives to plastics. Awareness raising may not fully address the cost issues of recycled plastics. In terms of the direct linkages between national action plans and development financing, it is not clear what linkages exactly this project will make. Please highlight technologies, approaches and mechanisms the project will implement that are currently not available in participating countries.

Sustainability: Polluter pay principles and EPR and other mechanisms mentioned in this section are not clearly described in the sections of relevant outputs. Please reconcile these and clarify what mechanisms and embedded systems including knowledge management will make sure the outcomes and effectiveness of the project will continue after the project interventions and financial support.

Scaling up: While there are some descriptions on scaling up from AFLDC-1, please rather describe how the project will embed mechanisms to scale up the outcomes of the project.

Agency Response

Sept 20, 2021:

The aspect of Circular Economy in the project has been elaborated on and made more explicit. The goal of the project is to increase the volume of financially sustainable

plastics recycling. The exact techniques and practices to be used will be decided based on the above mentioned assessment of potential partners, their unexplored collection potential, their market, and their technology in place already. Most likely, key techniques will be simple, yet occupationally and environmentally improved, techniques such as for example increased shredder capacity, granulators, packaging machines, etc.. As mentioned in the CEOER, Section 3) Output 3.4, the project will also target improved and increased collection based on, as feasible, existing community initiatives, selected through assessment in the project implementation. The project also provides a regulatory framework for increased recycling (in Component1) and assistance to recycling companies to increase their customer base, through the regional plastics recycling conference and fair undertaken in Output 1.4c .

Sustainability: Mechanisms have been elaborated on in CEOER Section 3) Component 1. See also the comment above.

Regarding scale-up, please see the comment above.

#### **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

Nov 1, 2021: We note the below response.

SY, Jan 8, 2021: Yes. However, please add other maps if detailed intervention areas are identified.

Agency Response

10 March 2022:

Maps are now added in the CEO Endorsement document for the project areas, where these are settled by now. The status of site locations is as follows:

? Output 3.1 in Addis Ababa region in Ethiopia

? Output 3.2 POP pesticides elimination nation-wide (within project budgets) in Angola, Ethiopia (based on the ChemObs safeguarding and disposal project, DDT is confirmed across 152 stores), Liberia, Sierra Leone, Togo, Zambia

? Output 3.3 PCB management nation-wide in Guinea, Liberia, Mauritania, Sierra Leone, Togo.

? Output 3.4a in the Kampala region in Uganda

For other intervention areas, these will be established based on detailed assessment made in the project implementation; see Outputs 3.4 and 3.5 on assessment and selection process planned.

Sept 20, 2021:

As the specific private sector partners are yet to be selected based on detailed assessment in the FSP, we cannot locate them on maps at present.

#### **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

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

March 29, 2022: Comment cleared.

Nov 1, 2021: Descriptions on each country plan are noted. Please add the general stakeholders engagement plan here as well, without the detailed tables of stakeholders.

SY, Jan 8, 2021: Please ensure that the stakeholders involved in all outputs are included in the stakeholder plan as some key stakeholders are missing from the plan (e.g. countries have output 3.4 do not have organizations relating to municipal waste management). Organizations who co-finance or conduct baseline projects should be



included in the stakeholder engagement plan for smooth coordination. Please consider the inclusion of gender-related CSOs in relation to gender action plan, as appropriate. Please see the comment on the private sector engagement.

#### Agency Response

10 March 2022:

We have updated the stakeholder section to be similar to the country annex stakeholder sections (but without national stakeholder lists).

Sept 20, 2021:

Extensive outreach to stakeholders have been made during the PPG, also during the 2nd consultations undertaken April ? May 2021; see the stakeholder engagement plans and response received from potential partner CSOs/NGOs in the country annexes. The stakeholders identified include gender related ministries and CSOs/NGOs.

#### **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

April 19, 2022: We note that the project will track gender-disaggregated indicators.

March 29, 2022: It is still not clear what gender-sensitive indicators are included in the results framework. Please clarify if such indicators are separately provided.

Nov 1, 2021: Please explain the reason why gender-sensitive indicators are not included in the project result framework. Please also clarify gender-responsible activities in the plan.

SY, Jan 8, 2021: Gender analysis and gender action plan are provided. However, there is no gender-sensitive indicators included (as in a stand-alone framework or in the project results framework).

#### Agency Response

16 April 2022:

It is noted that gender-sensitive indicators are not substantially reflected in the project design and therefore the taxonomy has been revised to exclude gender-sensitive indicators. The project will not be measuring progress towards gender equality. The project will only provide sex-disaggregated indicators.

10 March 2022:

Project results framework has been updated to include gender-sensitive indicators

Sept 20, 2021:

Gender-based GEBs are indicated in the Core indicator worksheet, indicator 11.

#### **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**

March 29, 2022: Comment cleared.

Nov 1, 2021: While it is not clear why private sector co-financing is not promised, one co-financier is a private sector. Please clarify.

SY, Jan 8, 2021: While some engagements with the private sector are described, please briefly describe key engagements with stakeholders relating to component 2 and 3. Engagements with private sector co-financiers are not described.

#### **Agency Response**

10 March 2022:

All electricity companies and AASWMA (administering the Reppie landfill) in Ethiopia have been engaged with and are publicly owned.

We unfortunately were not able to secure private sector co-financiers during the PPG, however a number were consulted, and we were able to gauge private sector interest. The engagement of the private sector as well as the identification and development of financial mechanisms will be further pursued during the early stages of project implementation. Co-financing has been committed by two entities, one for Sierra Leone and one for Ethiopia.

Sept 20, 2021:

Extensive outreach to private sector has been made during the PPG, also during the 2nd consultations undertaken April ? May 2021; see the response received from potential Component 2 (CSOs/NGOs) and 3 (private sector) partners in the country annexes. As regards private sector co-financiers, potential partners were asked , but were not yet able to promise anything in the current situation; see comments above on co-financing sources.

### **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

March 29, 2022: Comments cleared.

Nov 1, 2021:

1. We note the COVID-19 risks and opportunity analysis. Please note that there will be no "contingency budget" for GEF funding.
2. Recycling and other activities should incorporate GHG emissions as well.
3. Supervision and enforcement mechanisms of dealing with chemicals and waste should be added under the alternative scenario.
4. Comment cleared.

SY, Jan 8, 2021: There are some missing elements in this section. Please address.

1. COVID-19: The risks and measures should be identified at this stage, from communications to investments. Please provide more detailed analysis based on the COVID-19 project design and review considerations circulated to GEF Agencies last year.
2. Risks related to climate change may include the increase of energy consumption from transport, recycling and other activities related to chemicals and waste management.
3. Investments related to interim storages may be at risk for leakages. ?Chemical accidents during sampling, transport, storage, or disposal? is categorized as a low risk while the reasoning is not clear. International transportation of hazardous POPs will have another level of risks including tracking them until the final disposal is complete.
4. Alternatives to concerned chemicals or plastics: Switching to alternatives may increase the cost or may cause shortage of supply as indicated in the document. Please consider including the risk with mitigation measures.

## Agency Response

10 March 2022:

In response to comment 1 ?It is noted that there will be no "contingency budget" for GEF funding.

In response to comment 2 ?GHG reductions from recycling and energy-recovery operations in Output 3.4, and the associated emissions from transport and processing, are now addressed in the alternative scenario text.

In response to comment 3 - While we see supervision and enforcement of dealing with chemicals already addressed, we have emphasised this aspect further in the alternative scenario text of Outputs 3.2 (pesticides), 3.3 (PCB) and 3.5 (mercury).

Sept 20, 2021:

1. We have elaborated on COVID-19 related risks as per the circulated note. See the COVID-19 related risks and opportunities in the ?Risks section in the CEOER. Primary COVID-19 induced risks include physical access reductions, increased prices and a more uncertain financial climate.
2. The climate contributions are marginal, and not a key issue, but they are listed in the ESSSR.
3. As mentioned above in the response related to Outputs 3.2, 3.3 and 3.5, ESM has been clarified on in the same sections in the CEOER in summary, and in the ESSSR (Annex L) in detail. Interim storage sites will be selected based on a dedicated assessment to be conducted as part of the project, and international standards will be applied as detailed in the ESSSR (Annex L).
4. Alternatives are not a major issue, but it has been added.

## 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

March 29, 2022: Executing entities are clarified including that AfDB will not execute the project components.

Nov 1, 2021: AfDB cannot execute the project except M&E without adequate justifications and prior GEFSEC review (see the guidelines on project and program cycle). Please amend the relevant descriptions. The portal entry describes national

executing entities only while regional centers seem to be involved in execution in this section. Please correct.

SY, Jan 8, 2021: Not at this stage. It is not clear who will be involved in the execution. The 'Part I Project Information' on the portal, which has no names of regional centers, does not match the information contained in this section. The roles of regional centers (and UNITAR) and national executing entities are not clearly defined as well. Please correct information and clarify the roles in the portal and the organizational chart in this section with reasoning.

In terms of coordination with relevant GEF-financed projects and other initiatives, this project can collaborate with other projects including recently approved GEF project 'Phasing out mercury measuring devices in healthcare.' Please explore more for knowledge management and coordination purposes.

### Agency Response

10 March 2022:

AfDB is not executing the project. Details on the executing agencies have been revised and are reflected in the portal. The two regional centres have been added as executing partners.

Sept 20, 2021:

Each regional centre is responsible for a group of countries (divided by language). The regional centres will be responsible for regional trainings and meetings, whereas AfDB will be responsible for regional procurement of chemicals collection and final treatment services and recruiting of international experts that will serve the whole project.

National executing agencies will work closely with AfDB country offices and baseline project management in the country on national activities. The institutional arrangements section in the CEOER has been updated and clarified accordingly. The same information is summarised in the country annexes.

GEF-financed projects: Have been elaborated in CEOER section 2) and its section on 6.7. Institutional Arrangement and Coordination.

### 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

March 29, 2022: Please also include details of consistency with national priorities in the main portal document section.

## Agency Response

16 April 2022:

The consistency with national priorities section in the main portal document section has been updated with information contained in the respective country annexes.

## 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

March 29, 2022: Technical comment cleared.

Nov 1, 2021: This section needs to be elaborated as well, on top of the relevant sections on the portal.

SY, Jan 8, 2021: Knowledge management section is not elaborated from the PIF. For example, how the project will learn from lessons learned of previous projects and experiences including those in other countries should be elaborated. Knowledge management approaches within participating countries in the project are not well defined, which will impact the overall outcomes of the project. There are few concrete collaborations described with GEF-funded and non-GEF funded projects. Please also add timelines for deliverables of knowledge products.

## Agency Response

10 March 2022:

An overview of key knowledge management activities, the outputs they are part of, and their timing has been included in the CEO Endorsement document, Knowledge Management section. The knowledge management approach, including a budget, key deliverables and a timeline have been added, to demonstrate knowledge management contributions to the project's overall impact.

Sept 20, 2021:

Learning from previous projects: Experience and materials developed in previous projects will be included and this is for example mentioned in CEOER Section 3) text on Component1 (model legislation from AFLDC1; to be updated) and Output 3.4 (AFLDC1 experience on recycling of plastics). Coordination and exchange with other ongoing GEF (and other) projects will be undertaken as mentioned in the CEOER section on institutional arrangements.

Knowledge management between countries is secured in several activities, including the regional cross-pollination workshops in Output 1.4a, the virtual knowledge hub (website) in Output 4.1, in the regional industry conference held in Output 1.4b and the regional plastics? circular economy forum, fair and conference established in Output 1.4c., as well as in regional PSC meetings.,

#### **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

SY, Jan 8, 2021: Yes, please see relevant comments in this review sheet in particular relating to Risks.

#### Agency Response

10 March 2022:

Addressed.

#### **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

April 19, 2022: Comments cleared.

March 29, 2022: Please include the table in the main portal document (not attached in the portal document section). Please note basic supervise mission by AfDB should be covered by Agency fee. Please revise and confirm responsible party for each M&E activity as they are not clear (e.g. coordinators are within or outside PMU, roles of executing entities, etc.).

Nov 1, 2021: Please add a budgeted M&E table on the portal as per the guidelines.

SY, Jan 8, 2021: The budgeted M&E plan (both GEF funding and co-financing) is not on the portal or in the Annex I (Monitoring Plan). Please clarify how much will be allocated to AfDB in the implementation of MTR and TE. Please address this.

#### Agency Response

16 April 2022:

Annex I has been revised accordingly. The table has been included in the main portal document in the portal section.

10 March 2022:

A revised Annex I: Monitoring Plan, to include M&E contributions from AfDB baseline investments (co-financing), has been uploaded.

The M&E budget for the GEF activities have been revised to 945,153 USD. The M&E co-financing contribution is 11.896.000 USD.

Sept 20, 2021:

M&E and its budget is addressed in Annex I; Monitoring plan. The division of funds for M&E between the regional level (AfDB) and the national level has been described in the detailed budget. Of the total budget of USD 945,000 for M&E, 93% or USD 879,360 is administered regionally (AfDB), while 7% is administered nationally (additionally national contributions are made from the regular reporting under the PMC budget). Specifically, USD 134,200 is allocated for MTR and USD 212,700 is allocated for TE.

#### **Benefits**

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

Secretariat Comment at CEO Endorsement Request

Yes.

Agency Response

#### **Annexes**

**Are all the required annexes attached and adequately responded to?**

Secretariat Comment at CEO Endorsement Request

April 26, 2022: Budget table is adjusted. Comment cleared.



April 19, 2022: We note the responses. AfDB's prodoc needs to be updated in a later stage.

The budget table is off the margins ? please correct them (e.g. by presenting the budget only with outcomes and removing the outputs, so the Table will be slimmer and it will fit the margins)

March 29, 2022:

1. It is not clear which is ProDoc in the portal document while we note annexes. If AfDB does not include ProDoc in CER of GEF projects for the internal approval process, please explain so.

2. Again, please include the budget table in the main portal document. On the budget table, please address the below.

Responsible entity is either executing entity or AfDB (M&E and financial audit only). Entity can be ?national executing entities? or ?regional executing entities? instead of listing all EEs.

Categories and descriptions are not clear. Please revise budget lines removing the involvement of AfDB except M&E or financial audit.

?Sub-contract to executing partner/ entity? is not a category. Please correctly list budgetary items rather than contracting arrangements (e.g. travels, office equipment, etc.).

Please remove miscellaneous expenditure.

3. Please include Annex B and C.

4. Please update annexes if needed (e.g. one ToR says starting date is June 2021)

Nov 1, 2021: Annex B and C are still missing.

1. Not addressed. ProDoc is still not on the portal. Please add.

2. Not addressed. Please add a budget table on the portal using the template in accordance with the Guidelines on the Project and Program Cycle Policy updated in July 2020 (please read the relevant section. Budget tables in Annex and the portal entry should be the same).

SY, Jan 8, 2021: Not at this stage. Please add missing annexes B and C. Also please address the below.

1. Please upload the associated project document in accordance with the paragraph 11 of the Project and Program Cycle Policy.

2. Annex of the budget is not attached while there is a budget table in Annex F. The budget table, which may serve as an internal information, does not clarify 1) who administers what budget (including AfDB's budget on M&E if any), 2) PMCs, 3) M&E, among others. Please fully revise the budget table and use the template in accordance with the Guidelines on the Project and Program Cycle Policy updated in July 2020.

Agency Response

April 25, 2022:

The budget table margins have been corrected by slimming the table by presenting the breakdown only at the outcome level. Additional/separate tables were added below the main budget table, to still make the information available at the output level.

16 April 2022:

1. The AfDB draft ProDoc, which is called a Project Appraisal Report (PAR) was attached with the last submission.
2. The budget table has been included in the main portal document and we have addressed the main issues raised
3. Annex B and C have been included.
4. The annexes have been checked and found to be up to date. Starting date in TOR has been revised to indicate that the project implementation start is the start date.

10 March 2022:

1. Annex B and C have been uploaded
2. The draft ProDoc has been uploaded to the portal.
3. Annex F ? Budget Table has been revised using the template in accordance with the Guidelines on the Project and Program Cycle Policy updated in July 2020

Sept 20, 2021:

Regarding the M&E budget, please see comment right above.

Regarding the PMC budget division, this is shown in the detailed budget, as well as in all Tables 1 in the country annexes.

### **Project Results Framework**

#### **Secretariat Comment at CEO Endorsement Request**

April 26, 2022: Missing core indicators are included. Comment cleared.

April 19, 2022: Please explicitly mention that the GEF Core Indicators in the Results Framework in Annex A and include missing indicators.

March 29, 2022: Gender-related indicators are still not clear in the revision. Please again address end of project targets which still do not have numerical targets.

Nov 1, 2021: Please see the comment on the gender section.

SY, Jan 8, 2021: End of project targets do not match the final outcomes of each output. For instance, output 3.2's target of destroying 334 tons of POPs is not listed in the project end target, which is ?Re-packaging, removal and destruction of identified pesticides conducted in at least 5 of the 6 countries undertaking this output.? Also, such

targets related to POPs, uPOPs, and mercury emissions should be linked with expected GEBs. Please revise and adjust such targets while taking into consideration other comments in this review sheet.

#### Agency Response

April 25, 2022:

The GEF Core Indicators and additional missing indicators have been added to the Results Framework in Annex A.

16 April 2022:

It is noted that gender-sensitive indicators are not substantially reflected in the project design and therefore the taxonomy has been revised to exclude gender-sensitive indicators. The project will not be measuring progress towards gender equality. The project will only provide sex-disaggregated indicators.

Numerical targets have been included in the project results framework.

Sept 20, 2021:

Results framework (Annex A) has been edited to include up-to-date GEBs.

#### **GEF Secretariat comments**

Secretariat Comment at CEO Endorsement Request

#### Agency Response

#### **Council comments**

Secretariat Comment at CEO Endorsement Request Please include this in the main portal document. Please also include necessary information rather than just referring to annexes as it is not possible to check all annexes.

Agency Response Thank you, the comments and responses to Council comments are included in the main portal document.

**STAP comments**

Secretariat Comment at CEO Endorsement Request We note the responses. Please include these in the main portal document.

Agency Response Thank you, the comments and responses to STAP comments are included in the main portal document.

**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 Please include this in the main portal document.

Agency Response

**Project maps and coordinates**

Secretariat Comment at CEO Endorsement Request SY, Jan 8, 2021: Please see the relevant comment in the review sheet.

Agency Response

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

Secretariat Comment at CEO Endorsement Request  
Agency Response

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

Secretariat Comment at CEO Endorsement Request

Agency Response

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

Secretariat Comment at CEO Endorsement Request

Agency Response

**GEFSEC DECISION**

**RECOMMENDATION**

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

Secretariat Comment at CEO Endorsement Request

April 26, 2022: All comments cleared and the project is recommended.

April 19, 2022: Please address the two comments above.

March 29, 2022: We received the resubmission on March 28 while there are still remaining issues that have not been addressed. Please urgently resubmit addressing the comments at the earliest possible timing, taking into account the 4-week review period.

Nov 1, 2021: Only a part of comments are addressed. Please address the remaining comments shortly.

SY, Jan 8, 2021: Not at this stage. Please address the comments above.

**Review Dates**

**Secretariat Comment at  
CEO Endorsement**

**Response to  
Secretariat  
comments**

<b>First Review</b>	<b>1/8/2021</b>
<b>Additional Review (as necessary)</b>	<b>11/1/2021</b>
<b>Additional Review (as necessary)</b>	<b>3/29/2022</b>
<b>Additional Review (as necessary)</b>	<b>4/19/2022</b>
<b>Additional Review (as necessary)</b>	<b>4/26/2022</b>

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**