



Circular Solutions to Plastic Pollution in Nigeria

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

11193

Countries

Nigeria

Project Name

Circular Solutions to Plastic Pollution in Nigeria

Agencies

UNEP

Date received by PM

6/27/2024

Review completed by PM

11/20/2024

Program Manager

Evelyn Swain

Focal Area

Multi Focal Area

Project Type

FSP

CEO

Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request

Please update the region.

Please remove mixed & other. This field is only for CCM

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Africa is noted as region in the CEO ER in the road map however, it should be noted that the portal only allows for country or region to be recorded at Concept/PIF stage and cannot be changed by UNEP

In entry mode at CEO ER stage - showing that no entry is active

Type of Trust Fund

GET

Project Title

Circular Solutions to Plastic Pollution in Nigeria

Countries

Nigeria,

In review mode at CEO ER showing twice Nigeria which cannot be amended by UNEP

Parent Project Title:	Circular Solutions to Plasti
Child Project Title:	Circular Solutions to Plasti
Region:	Nigeria
Country(ies):	Nigeria

Mixed and other was deselected although it was requested at Concept stage

b) Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?

Secretariat comment at CEO Endorsement Request

Please consider downgrading the Biodiversity down from Principal, as Biodiversity does not seem a primary objective of the project which also is not set to yield biodiversity benefits as captured under the related Core Indicators.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Changed to ?significant? in the document and portal

2. Project Summary.

a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected outcomes?

b) Does the summary capture the essence of the project and is it within the max. of 250 words?

c) [If a child project under a program] Does the project summary include adequate and substantive link with the parent program goal and approach?

Secretariat comment at CEO Endorsement Request

The summary is significantly longer than expected (650 words). Please shorten and focus on the most essential aspects. Please add estimated GEBs. The font is not consistent.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

The summary has been reduced to 242 words. Font is consistent in the CEO ER in the road map but the portal does not always keep the font harmoniously

3. Project Description Overview

- a) **Is the project objective statement concise, clear and measurable?**
- b) **[If a child project under a program] Is there a project Theory of Change that is aligned and consistent with the overall program goal and approach?**
- c) **Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?**
- d) **Are gender dimensions, knowledge management, and M&E included within the project components and budgeted for?**
- e) **Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**
- f) **Is the PMC equal to or below 10% (for MSP) or 5% (for FSP)? If above, is the justification acceptable?**

Secretariat comment at CEO Endorsement Request

Please revise to make co-financing contributions to PMC proportional to GEF-financing contributions. The co-financing contribution to PMC is not proportionate compared with the GEF contribution to PMC. If the GEF contribution is kept at 3.0%, for a co-financing of \$ 33,597,671.33 the expected contribution to PMC must be around \$ 1,007,930.14 instead of \$ 575,608.00 (which is 1.7%). As the costs associated with the project management must 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 the Agency to amend either by increasing the co-financing portion and/or by reducing the GEF portion. Also note that even if the co-financing portion allocated to PMC is increased to 3.0%, this may not be enough to cover the costs of managing the project.

PMC is below 5%.

On the description overview table:

- There is a one-dollar difference between the component 5 in the GEF Portal table and the total of component 5 of the budget table.
- Please avoid the usage of decimals in the financial values.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Co-financing is now proportional to the GEF allocation. Also 2 new private sector and NGO co-financing was secured and is now included

Dollar difference is noted and corrected. This was due to the rounding up to avoid decimals.

Decimals were removed from overview table and CF table. Letters of CF will therefore not match entirely.

4. Project Outline

A. Project Rationale

- a) **Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?**
- b) **Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?**
- c) **If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?**

Secretariat comment at CEO Endorsement Request

Private sector comments:

Water supply and access model. Innovation in the supply alternatives to shift from plastic sachets/SUP models to supplied water in various delivery mechanisms. Learnings from this innovative program could be applied globally in tackling the water sachet/SUP issue, especially in other countries in the IP, notably Senegal and Jordan.

Innovative in that the model focuses on consumer needs rather than upstream/mid stream business practices.

The private sector is a key player and is not included in the co-financing of the projects.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Noted. The coordination with the Global Project will ensure that learnings are accessible worldwide, and particularly to other West African countries and those participating in the IP.

"The private sector is a key player and is not included in the co-financing of the projects. " Not sure why there is this comment as private sector co-financing from Coca Cola is clearly presented in Annex A and since submission additional private sector co-funding from Seven-Up has been secured and added.

5 B. Project Description

5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the focus and basis (including scientific) of the proposed solutions, how they provide a robust approach? Are underlying key assumptions listed?

b) [If a child project under a program] Is the Theory of change aligned with and consistent with the overall program goal and approach?

c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region? [If a child project under a program] Does the description include how the alternative aligns with and contributes to the overall program goal and approach?

d) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks properly justified? Is there an indication of why the project approach has been selected over other potential options?

e) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

f) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?

g) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?

h) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this FSP/MSP)?

i) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?

j) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component design and description/s?

k) Are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?

l) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

m) Transformation and/or innovation: Is the project going to be transformative or innovative? [If a child project under an integrated program] Are the specific levers of transformation identified and described? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

Component 1 on regulatory and policy environment need to be more specific to ensure that the project creates impact within its timeframe. It is mentioned that "wide range of policies and regulations will be addressed". Table 2 and Box 1 outlines the policy context for water management in Nigeria. What type of policies or regulations will the project prioritize for maximum impact, and what kind of additions/amendments are likely to be achieved within the scope of the project?

This project targets the water packaging, but the underlying issue is the scarcity of clean drinking water. Will the underlying issue also be addressed at through the policy and investment mobilized components?

On page 4, it says that the project will (?) support the creation of a sustainable water resource and waste management infrastructure in selected States of the federation. The IP does not fund downstream activities such as waste management infrastructure. Please revise or clarify that this will be covered by co-financing.

The Theory of Change need to incorporate the lack of clean drinking water as a major contributor to the plastic waste generated from water sachets. It currently states "The Nigeria Child project will tackle pure water as major source of plastic pollution?". Please rephrase for clarity, and elaborate on how the existing lack of pure water can be addressed in a systemic manner to reduce plastic pollution.

The project mentions participation in IW:Learn (1% of the budget). Child projects under the Plastics IP are welcome to engage with IW:Learn, but this is not required or to be budgeted for. The global project will take the lead on engaging with IW Learn.

Under component 5 key aspects of the coordination with the global project is missing. Please work with the lead agencies and reference the google doc checklist to rework this component.

On gender, women and women-led businesses are included throughout the components. Most output targets aim for 25% women. Please clarify if there is a possibility to increased this share, or if it is deemed to be ambitious enough in the context of Nigeria.

How will the project coordinate and build off of other ongoing initiatives in the country, including GPAP?

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

In Activity 1.1.1.1, preliminary policy priorities are specified: packed water quality, licensing of water companies, EPR development, deposit-refund scheme development for beverage bottles, and green public procurement, among others.

Interventions may relate to amendments of legal texts to enhance provisions for safe/circular water packaging, or implementing acts in relation to wider policies such as green public procurement and EPR. These are captured in the Ban of Single-use plastics within departments and agencies of the Federal Ministry of Environment and the EPR Guidelines, which shall be further developed and enforced through the project implementation. As a result, federal agencies should have capacity and implement the ban on single-use plastics, and a vast majority of water companies participate in the EPR scheme.

Notwithstanding, the policy gap analysis will prioritise those policies.

The project will ensure collaboration with the Federal Ministry of Water and sub-national authorities in charge of water, advocating for providing clean drinking water (policy component). The project will not directly fund facilities for potable water, but it will ensure clean water is made available through the reuse pilots to be funded by the project. For this, collaboration will be established with concerned authorities (e.g. Lagos Water Corporation).

Page 4 - There is no such intention or statement, The project will not fund infrastructure, but will work closely with the Ministry of Water that is mandated to address water access.

TOC - The scarcity of clean drinking water and the inefficient water pipeborn distribution is explained in the rationale as a driver for sachets pollution, and it is now included in the ToC. It is stated that the project will not intervene directly at that level, because there are important initiatives already addressing this issue (e.g. World Bank). Notwithstanding, the collaboration with the Federal Ministry of Water within the project should advocate for improving water pipeborn distribution. The Child project focuses on water distribution through reuse/refill systems, which comes in complement to pipeborn distribution.

For reuse/refill system, collaboration with water authorities and corporations will be established to ensure clean drinking water is made available, which according to the consultation process is granted.

The sentence ?The Nigeria Child project will tackle pure water as major source of plastic pollution?? has been rephrased as ?The Nigeria Child project will tackle pure **packed** water as major source of plastic pollution?? for clarity.

IWLEARN - Direct reference and budget to IW:LEARN removed and CEO document, results framework and workplan adjusted accordingly. However recommend that lessons learned and experience notes are developed using a combined template that can be sent to the global project and IW:LEARN (to be agreed at Inception phase)

Component 5 - Text updated based on the guidance provided by the global project which follows the same logic as presented in the project

Gender - A revision of the targets is done and in some cases the percentages have been increased for specific targets (related to participation), considering that in some sectors (e.g. water management / environmental issues), women already play significant roles/ particularly at the community level.

Outputs 2.1.2, 2.3.1, 3.2.3, 3.2.4, 4.1.2, 5.2.1, 5.2.2 and M&E Output 1

Coordination with ongoing initiatives - The project will coordinate with other initiatives mainly through the Multi-stakeholder roundtable on 'less plastic in water?' (Output 4.1.2). Representatives of key related initiatives will be invited to join and share their experience. This will allow the project to build on them, maximising the synergies (e.g. reinforcing incipient water reuse systems). During the PPG the EA already exchanged with GPAP and the collaboration will be bi-directional. GPAP already offers important baseline information on plastic consumption and waste, and the project will contribute to their roadmap. Likewise, the Child project will implement actions in their roadmap to the extent possible and the Output 4.2.1. Roadmap for circular systems in the water sector will build on the GPAP roadmap to ensure complementarity.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project

- a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**
- b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**
- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**
- d) [If a child project under an integrated program] Does the framework for coordination and collaboration demonstrate consistency with overall ambition of the program for transformative change?**

Secretariat comment at CEO Endorsement Request

The project components include development and capacity building around EPR. The GEF-7 UNEP project 'Circular Economy Approaches for the Electronics Sector in Nigeria?' (GEF ID 10141) focused on developing a model of EPR for electronic waste in Nigeria. It was also executed by NESREA and successful in engaging many stakeholder groups under a common platform. How can the Plastics IP child project in Nigeria learn from this previous project and scale up lessons learnt in other waste streams, such as plastics?

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

The GEF-7 UNEP project, "Circular Economy Approaches for the Electronics Sector in Nigeria," offers valuable lessons for the Plastics IP child project in developing Extended Producer Responsibility (EPR) for plastics, and it is been added in the Rationale section.

These lessons include:

1. Stakeholder Engagement: The GEF-7 project successfully created a collaborative platform involving government, private sector, and civil society. The Plastics IP project should similarly engage a broad range of stakeholders to foster shared responsibility.
2. Capacity Building: Tailored training programs can educate producers about EPR obligations and best practices. Knowledge-sharing forums will allow stakeholders to learn from each other's experiences.
3. Policy Development: Understanding regulatory frameworks from the GEF-7 project is crucial for enforcing EPR for plastics. The Plastics IP project can also explore compliance incentives for sachet water producers.
4. Monitoring and Evaluation: Establishing robust data collection and clear metrics will measure the effectiveness of EPR initiatives.

Feedback mechanisms are essential for continuous improvement.

5. Communication Strategies: Public awareness campaigns can highlight the importance of EPR for plastics, while transparent reporting can build trust among stakeholders.
6. Best Practices: Adapting successful strategies from the electronics sector and implementing pilot projects will provide insights into EPR feasibility for plastics sachets.

Utilizing these lessons effectively, the Plastics IP project can establish a robust Extended Producer Responsibility (EPR) framework for the sachet water & SUP packaging sector.

5.3 Core indicators

- a) Are the identified core indicators calculated using the methodology and adhering to the overarching principles included in the corresponding Guidelines (GEF/C.62/Inf.12/Rev.01)? [If a child project under a program] Is the choice of core indicators consistent with those prioritized under the parent program?
- b) Are the project's targeted contributions to GEBs (measured through core indicators and additional listed outcome indicators) /adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

CI.11: The number is very large (3 million). How is the area covered by the project defined? Please review the number to ensure it includes only direct beneficiaries. Pages 24-25 of the GEF-8 Results

Measurement Framework Guidelines (GEF/C.62/Inf.12/Rev.01) provide examples of what might be counted as direct beneficiary.

No targets are included under Core Indicator 5 on marine habitats under improved management. Given the GEBs described on p. 77, please assess if the project can contribute to this indicator. If so, please add target.

Under Core Indicator 11, please refer to the indicator definition in the GEF-8 Results Measurement Framework guidelines aiming to capture only direct beneficiary and adjust the level of expected results as appropriate.

The explanation of the methodological approach used to compute the indicator on plastic avoided indicates the target has been identified by including results from years of implementation beyond the project's own duration. This is in line with the GEF-8 Results Measurement Framework Guidelines' principle stating that "Expected values should be based on what the GEF-financed project and program can achieve by its completion." Please adjust accordingly as well for the POPs indicator which is derived from this indicator.

The language justifying target levels seems to be standard, with language stating: "the durations used to estimate the project impact will be project-specific." Consider tailoring further to the project context.

ES, 11/12/24: Please add CI 7 and 7.3.

ES, 11/14/24: Comments addressed.

Agency Response

Agency response 14 October 2024

CI 11 - This figure was based on the original endorsed concept and indeed included direct and indirect beneficiaries. This number has been now recalculated in line with GEF guidance.

CI 5 - The project will not address Indicator 5. This is in line with the endorsed concept. In guidance doc above, it reads: This indicator captures the area of marine habitat under improved management to benefit biodiversity and/or for which management plans have been prepared and endorsed and are under implementation.

There is not marine plan as such, but the benefit of reducing leakage into the environment.

The explanation for the calculation of indicator 9.8, 6.7 and 10 has been enhanced.

The figures for indicators on plastic waste avoided and POPs correspond to the project impact during the 5 years implementation.

Language on target levels - This has been deleted, the explanation on core indicators is included in the comment above.

Agency response 13 Nov. 2024

CI7 was reinserted and now reflects GCLME as the transboundary system impacted by the project intervention and sub-indicator 7.3 on reforms and IMCs has been set at 2.

5.4 Risks

- a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?**
- b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?**
- c) Are environmental and social risks, impacts and management measures adequately assessed and rated and consistent with requirements set out in SD/PL/03?**

Secretariat comment at CEO Endorsement Request

The risk table needs to be filled out.

Please adjust the rating under the 'Environmental and Social' risk category in line with the ESS risk category. The ratings are not in line as is. Doing so would be in line with the description of the 'Environmental and Social' risk category in Annex B of the GEF Risk Appetite document (GEF/C.66/13) stating that: 'The rating reported by project under this category is identical to the Overall Safeguards Risk rating provided at PIF, CEO Endorsement, MTR and TE stage.'

Under the Overall Risk category, please provide a summary that helps understand the identified rating.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Risks table - The risk table is visible in the CEO Endorsement and on the portal. It seems to be a common problem related to the portal at GEF Sec end.

The ESS and Risk categories are not identical, however risks have been revised to be inline.

A summary to understand the rating - Summary included

5.5 For NGI Only: Is there a justification of the financial structure and of the use of financial instrument with concessionality levels?

Secretariat comment at CEO Endorsement Request NA

Agency Response

6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities

6.1 a) Is the project adequately aligned with Focal Area objectives, and/or the LDCF/SCCF strategy?

b) [If a child project under an integrated program] Is the project adequately aligned with the program objective in the GEF-8 programming directions?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors).

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e., BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat comment at CEO Endorsement Request

Please identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

TARGET 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity is now included in the CEO ER.

The target reads:

Reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: (a) by reducing excess nutrients lost to the environment by at least half, including through

more efficient nutrient cycling and use; (b) by reducing the overall risk from pesticides and highly hazardous chemicals by at least half, including through integrated pest management, based on science, taking into account food security and livelihoods; and (c) **by preventing, reducing, and working towards eliminating plastic pollution.**

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

Please ensure that gender-related activities are budgeted and during project implementation, the PIRs, the MTE and the TE should include a review and reporting of the GAP and relevant gender dimensions of the project

ES, 11/12/24: Comments addressed.

Agency Response [Agency response 14 October 2024](#)

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

7.4 Have the required applicable safeguards documents been uploaded?

Secretariat comment at CEO Endorsement Request

We note that the project's overall ESS risk is classified as moderate, and UNEP attached the Safeguard Risk Identification Form (SRIF).

SRIF said that "project triggering SS 3, 4, 6 and 8 [and], appropriate safeguard assessments and management plans will be necessary for E&S risk mitigation. Adequate engagement with the affected players (mainly informal collectors, sorters, aggregators and recyclers) will be required to find alternative livelihood solutions as they are to be economically displaced from their source of

livelihoods. Appropriate E&S mitigation measures will be needed once the exact EPR pilot interventions and their sites are clearly defined. Attention to be paid to community safety, and labour and working conditions.? However, It is not clear about an environmental and social risk management plan of this project includes these suggested mitigation measures.

o Please provide the environmental and social risk management plan including these suggested mitigation measures with a clear timeline, responsibility, and budget.

o A summary of these mitigation measures and action plans needs to be provided in the environmental and social risk section of the Key risk table in the Portal. Also, Nigeria is one of the countries under conflict in the WBG FY25 List of Fragile and Conflict-affected Situations.

o Please ensure that conflict assessment and analysis are conducted and a clear risk management plan with mitigation measures and budgets is identified based on the assessment. In addition, the environmental and social risk of the Key risk section in the Portal is low.

o Please make these risks consistent with ESS risk and revise.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Environmental and social risks - This will be included in the inception phase in the development of the workplans for the pilots. These environmental and social risk management plan are now mentioned also in the M&E plan as a key step in the development of pilots.

- Additional text has been added to stress that care must be taken in the environmentally sound management of the pilots, to avoid risks of waste management and pollution, where relevant safeguard assessments and management plans will be necessary for E&S risk mitigation before pilots or re-use schemes are implemented

- Conflict assessment and analysis will be conducted and a clear risk management plan with mitigation measures and budgets is identified based on the assessment during the Inception Phase.

- Revisions and alignment completed

8 Annexes

Annex A: Financing Tables

8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency

fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):

STAR allocation?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

Focal Area allocation?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement Request NA

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement Request NA

Agency Response

SCCF B (Tech Transfer, Innovation, Private Sector)?

Secretariat comment at CEO Endorsement Request NA

Agency Response

Focal Area Set Aside?

Secretariat comment at CEO Endorsement Request NA

Agency Response

8.2 Project Preparation Grant (PPG)

a) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement Request

The amounts do not add up for each category. [Budgeted Amount] = [Amount Spent To Date] + [Amount Committed].

Please request the agency to amend.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

PPG budget has been updated

8.3 Source of Funds

Does the sources of funds table match with the amounts in the OFP's LOE?

Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement Request ^{Yes}.

Agency Response

8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request

Co-financing is included and there is some degree of co-financing from the private sector.

Except for the in-kind contribution from SON (USD 200,000 mainly for salary), there is no detailed information for other co-financing contributions in the co-financing letters. Please provide these details in the Portal's co-financing description field. For future projects, ensure this information is included in respective co-financing letters.

The grant of 2,686,583.20 from NESREA CITEO is currently categorized as Recurrent Expenditures, but grants are generally classified as Investment Mobilized per the GEF Co-financing Guidelines. Please review and revise the categorization as necessary.

The in-kind contribution of USD 4,326,000 from the EU does not include a conversion rate/source/date. We can reverse calculate the conversion rate, but a source (e.g., UN Treasury Operational Exchange Rates) and conversion timing are required for the record.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

The EA, NESREA, provides two co-financing letters: one related to salaries for project support and representation, and another one to complement the EPR activities in the project.

Other institutions, i.e. the Federal Ministry of Environment and SON provides salaries as co-financing for project support and representation, and in the case of SON particularly for the work to be done in norms and standards.

Private organisations i.e. Coca-Cola, 7Up and FBRA provides co-financing in terms of initiatives to improve waste management, particularly collection and recycling, which complements the upstream project intervention, as well as on public awareness. In the case of the EU Delegation, the co-financing supports the project business support program in terms of just transition and circular economy approaches.

NESREA CITEO grant corrected Annex A to grant and investment mobilized.

The conversion source used was InforEuro, which provides the European Commission's official monthly accounting rates for the euro, the corresponding conversion rates for other currencies. The exchange rate applied was in June 2024: 1 USD = 0.92464 EUR

CEO document now mentions this.

Annex B: Endorsements

8.5 a) If ? and only if - this is a global or regional project for which not all country-based interventions were known at PIF stage and, therefore, not all LOEs provided:

Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

b) Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

c) Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

Annex C: Project Results Framework

8.6 a) Have the GEF core indicators been included?

b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of total project financing (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the Template?

e) [If a regional/global coordination child project under an integrated program] Does the results framework reflect the program-wide result framework, inclusive of results from child projects and specific to the regional/global coordination child project? [If a country child project under an integrated program] Is the child project result framework inclusive of program-wide metrics monitored across child project by the Regional/Global Child project?

Secretariat comment at CEO Endorsement Request

Core indicators are included in the budget. However not all of the budget can be viewed in the portal. Please upload it so that it is visible.

Project Results Framework table in the CEO Endorsement Portal view (which is the document that is circulated and webposted) is off the margins ? please amend (if needed, ITS can help)

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

Do you mean the Results Framework as the budget does not include core indicators?

Results framework table reformatted

Annex E: Project map and coordinates

8.7 Have geographic coordinates of project locations been entered in the dedicated table? Are relevant illustrative maps included?

Secretariat comment at CEO Endorsement Request

The GeoName ID does not seem to be entered using the <https://www.geonames.org/> platform. Please update as appropriate.

ES, 11/12/24: Comments addressed.

Agency Response

Agency response 14 October 2024

GeoName ID's have been added however it should be noted that for Nigeria, not all precise locations have related existing geo-referencing numbers, and this will be revised at Inception phase.

Annex F: Environmental and Social Safeguards Documentation and Rating

8.8 Have the relevant safeguard documents been uploaded to the GEF Portal? Has the safeguards rating been provided and filled out in the ER field below the risk table?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

Annex G: GEF Budget template

8.9 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

The budget is missing executing partner lines for the two executing partners. Please include in the budget table the column containing the information for ?Responsible Entity (Executing Entity receiving funds from the GEF Agency)?.

A Project Coordinator is being charged across components. Although there are Terms of Reference, these are not clear as the amounts specified does not add up to the same in the budget table. Per Guidelines, the costs associated with the project's execution must be covered by the GEF portion and the co-financing portion allocated to PMC. Please review so the project staff can be appropriately charged to toe PMC (GEF and co-financing portion).

Technical and scientific staff is not described in detail ? please provide an explanation of which personnel is paid with these resources to understand whether they must be charged to PMC exclusively or if they can be charged to projects components too (in which case, TORs must be provided).

Program Support Costs is not an eligible category ? please remove it from the budget.

The project personnel and consultants specified in the budget table do not match with the roles specified in the TORs for key Positions and consultancy described in the attached Appendix 3f. Please reflect it in the budget table.

?Other staff? is not a valid category. Please specify.

ES, 11/12/24: ES, 11/12/24: The Budget Table now lists responsible entity in the last column. Please note that the portal currently shows two Executing Entities for the project ? NESREA and UNDP. If UNDP no longer are involved in execution, please remove.

ES, 11/15/24:

a. We take note of the explanation provided by the agency on the review sheet, however there are still multiple mismatches between the TORs provided in the appendix 3f and the budget table. For example, for Staff in the TOR there is a ?Gender expert \$67,500? while in the budget table there is no reference to this position and the budget line justification is misleading, if using the budget amount as a reference.

b. Similarly for the consultants. For example, in the TOR there is a ?K&M expert \$45,000? while in the budget table there is no reference to this position and the budget line justification is misleading, if using the budget amount as a reference.

c. Most of the positions included in the TOR do not have a clear match in the budget table: Policy expert (\$135,001 in the budget, \$67,500 in the TOR), State plans experts, Guidelines and capacity building, EPR expert, Fiscal policy expert, Financing expert, Norms and standards expert, Sociological expert. Please request the Agency to review and revise the budget table and the TORs annex to ensure consistency.

ES, 11/18/24:

a. We take note of the explanation provided by the agency on the review sheet, however there are still multiple mismatches between the TORs provided in the appendix 3f and the budget table. For example, for Staff in the TOR there is a ?Gender expert \$67,500? while in the budget table there is no reference to this position and the budget line justification is misleading, if using the budget amount as a reference.

b. Similarly for the consultants. For example, in the TOR there is a ?K&M expert \$45,000? while in the budget table there is no reference to this position and the budget line justification is misleading, if using the budget amount as a reference.

c. Most of the positions included in the TOR do not have a clear match in the budget table: Policy expert (\$135,001 in the budget, \$67,500 in the TOR), State plans experts, Guidelines and capacity building, EPR expert, Fiscal policy expert, Financing expert, Norms and standards expert, Sociological expert. Please request the Agency to review and revise the budget table and the TORs annex to ensure consistency.

ES, 11/20/24: Comments addressed.

Agency Response

Agency response 14 October 2024

We only have one Executing Agency, NESREA. Budget Table reflects the same.

The amount in budget has been corrected and it corresponds now to TOR, 138.000 USD. It was a matter of rounding figures due to working with time percentages across the different components.

The Project Coordinator will be involved in all project components with different time allocation. For PMC, the time allocation is 25% and 5 % on M&E. The TOR appendix 3f has been changed to reflect the technical involvement in all components.

Only 1 staff member TECHNICAL PROJECT OFFICER, TOR appendix 3f has been modified to justify time allocation to the different technical components

PMC was removed.

Given the complexity of managing 7 UNEP child projects, a common approach was adopted to ensure consistency and ease of management and reporting, by using a standard interlinked template with standard categories. Regarding 'other staff' and 'other consultants' these cover staff/consultants not covered by the standard categories. These, along with all staff and consultants are full elaborated in a separate work-book including unit costs, time allocation and to which outputs the person contributes to. As such, this information is not reflected in the summary UNEP and GEF worksheets.

In terms of 'other consultants' this includes:

- 1 - K&M Consultant (spread over Components 5 and M&E) at 45 k
2. 2 - Guidelines and capacity building (2 persons) related to output 1.3.2 and at total cost of 36,000
3. 3 - Fiscal policy expert (outputs 2.2.1 and 2.2.2) at cost of 15,840
4. 4 - Norms and standards expert (output 3.1.1) at cost of 15,840 k
5. 5 - Sociological expert (output 4.1.1) at cost of 33,750

Ot Other staff - See response above.

This category corresponds to one staff member only, Admin Assistant & Workshop support person, described in the TOR Appendix 3f 'at a cost of 42,000 USD.

Agency response 13 Nov. 2024

UNDP was not reflected in the budget but rather it is UNEP which is reflected given that the resources for evaluation are never passed on to the Executing Agency. See screenshot below. Nothing was changed.

Consultants w/m	Financial mechanisms and sustainable financing expert(s)					60,790		60,790	NESREA
Consultants w/m	Circular Economy expert(s)					22,500		22,500	NESREA
Consultants w/m	M&E specialist		15,000			15,000		15,000	NESREA
Consultants w/m	Other project consultants/experts	18,000	18,000		9,000	146,340		146,340	NESREA
Consultants w/m	Evaluator (Mid-term)(Terminal)				110,000	110,000		110,000	UNEP
Administrative Support									

As described in the implementation arrangement section, UNDP will be administering the project (financial management) for NESREA as a support agency. NESREA is however the main EA.

Agency response 18 Nov. 2024.

Please note the below table mapping out the budget and TORs. Appendix 3f has been finessed to show the exact same wording as in the budget summary sheet. Note the admin cost being split between PMC and components given the PMC threshold. Note though the different TORs for each functions. A revised Appendix 3f has been uploaded in the portal road map.

Expenditure Category	Detailed Description (as per budget)	Posts as per TORs	Total budget (USD)
Project Personnel	Project Coordinator / Senior Technical Advisor	Project Coordinator / Senior Technical Advisor	138,000
Project Personnel	Technical and scientific staff	Project Technical Officer	90,002
Project Personnel	Communications, KM, systems and data management staff:	National Communications Officer	67,500
Project Personnel	Stakeholder Engagement, capacity building and private sector staff	Gender and Inclusion Expert	67,500
Project Personnel	Other Staff	Admin Assistant & Workshop support	42,000
Consultants	Policy and legislation experts	Policy expert	57,858
		State plans experts (3 experts)	77,143
Consultants	Thematic plastic technical and scientific experts	EPR expert (registry and business plan)	45,000

Consultants	Financial mechanisms and sustainable financing expert(s)	Financing Expert	60,790
Consultants	Circular Economy expert(s)	Eco-Design expert	22,500
Consultants	M&E specialist	M&E Expert	15,000
Consultants	Other project consultants/experts	Guidelines and capacity building experts (2)	36,000
		Fiscal policies expert	15,750
		Norms and standards expert	15,840
		Sociological expert	33,750
		K&M expert	45,000
Consultants	Evaluators (Mid-Term) (Terminal)		110,000
Administrative support	Admin / Finance Support Staff (PMC)	National Project Finance Assistant	42,000

Agency response 19 Nov. 2024.

We note that GEF Sec.'s comments of 15 Nov. and 18 Nov. 2024 are exactly the same despite the 18 Nov. 2024 agency response.

On 18 Nov. 2024, all 3 points as highlighted under a, b and c were addressed in one consolidated response clarifying in a table the correlations between the budget and the different posts? TORs. The same table was added into appendix 3f. and as required post labellings were adjusted to ensure a 100% match between the ToRs and the budget.

Further, we clarified any potential subsequent queries regarding the admin personnel as highlighted in yellow in the table below. Indeed, the admin costs are being split between PMC and components given the PMC threshold. Both admin lines are supported by different TORs specific to each functions.

Finally, the response specified that a revised Appendix 3f had been uploaded in the portal road map. The budget in contrast did not change.

We trust the above further clarifies the agency response dated 18 Nov. 2024

Expenditure Category	Detailed Description (as per budget)	Posts as per TORs	Total budget (USD)
Project Personnel	Project Coordinator / Senior Technical Advisor	Project Coordinator / Senior Technical Advisor	138,000
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Project Personnel	Communications, KM, systems and data management staff:	National Communications Officer	67,500

Project Personnel	Stakeholder Engagement, capacity building and private sector staff	Gender and Inclusion Expert	67,500
Project Personnel	Other Staff	Admin Assistant & Workshop support	42,000
Consultants	Policy and legislation experts	Policy expert	57,858
		State plans experts (3 experts)	77,143
Consultants	Thematic plastic technical and scientific experts	EPR expert (registry and business plan)	45,000
Consultants	Financial mechanisms and sustainable financing expert(s)	Financing Expert	60,790
Consultants	Circular Economy expert(s)	Eco-Design expert	22,500
Consultants	M&E specialist	M&E Expert	15,000
Consultants	Other project consultants/experts	Guidelines and capacity building experts (2)	36,000
		Fiscal policies expert	15,750
		Norms and standards expert	15,840
		Sociological expert	33,750
		K&M expert	45,000
Consultants	Evaluators (Mid-Term) (Terminal)		110,000
Administrative support	Admin / Finance Support Staff (PMC)	National Project Finance Assistant	42,000

Annex H: NGI Relevant Annexes

8.10 a) Does the project provide sufficient detail (indicative term sheet) to assess the following criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.

c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement Request NA

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1.GEFSEC Recommendation

Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

Not at this time. Some issues remain.

ES, 11/12/24: Not at this time. Some issues remain.

ES, 11/15/24: Please respond to comments on budget.

ES, 11/15/24: Please respond to comments on budget. Comments are still remaining.

ES, 11/20/24: Comments addressed. CEO Endorsement is recommended.

9.2 Additional Comments to be considered by the Agency during the inception and implementation phase

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

	CEO Approval	Response to Secretariat comments
First Review	8/15/2024	
Additional Review (as necessary)	11/12/2024	
Additional Review (as necessary)	11/14/2024	
Additional Review (as necessary)	11/15/2024	
Additional Review (as necessary)	11/20/2024	