



Supporting the Implementation of the National Action Plan on Marine Plastic Litter in the context of Green Recovery post-COVID 19 in Viet Nam

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID

11017

Countries

Viet Nam

Project Name

Supporting the Implementation of the National Action Plan on Marine Plastic Litter
in the context of Green Recovery post-COVID 19 in Viet Nam

Agencies

UNDP

Date received by PM

6/30/2023

Review completed by PM

8/2/2023

Program Manager

Andrew Hume

Focal Area

International Waters

Project Type

MSP

PIF CEO Endorsement

Part I ? Project Information

Focal area elements

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

Secretariat Comment at CEO Endorsement Request

(Karrer, Aug 2, 2023). No. Thank you for developing a new theory of change; however, it is unreadable and confusing in the current layout. There are lines overlapping making it unclear how the different aspects are related. Please review the STAP guidance and develop a diagram that legibly shows how the activities, outcomes, and outputs relate to each other and to the ultimate objectives. Please also note assumptions related to these aspects. The examples at the end of the STAP guidance document are helpful for considering options for the diagram. While interesting, it is confusing to include the stakeholders so I'd suggest removing this information unless noted with footnotes (see, for example, how Figure 8 uses footnotes to insert the assumptions).

There is no need to delete the previous diagrams. They are important given they were developed with stakeholders, so they could be included just not labeled 'theory of change'.

(Karrer, July 17, 2023). No.

Regarding the theory of change, while the diagrams help visualize the project outputs along the plastic lifecycle, it's not clear how they address the barriers and lead to the outcomes, components, and ultimately the goal of the project. Please review how to develop a theory of

change (see STAP guidance <https://www.stapgef.org/resources/advisory-documents/theory-change-primer>) and add a diagram that reflects these aspects.

Note: Please provide a revised version with track changes, which will make the review much easier.

Agency Response

Agency response (8 August 2023): Noted. We have developed a new TOC diagram and replaced the previous iteration in the PD (p. 22) and the CER (p.29). The four diagrams have been retained on the two following pages, but the 'theory of change' labels have now been removed.

Agency Response 1 Aug 2023

Thank you for your comments. The TOC diagram was developed with involvement of all the project stakeholders, through the whole project design, and intended to demonstrate at which stage of the plastic cycle the project would improve that cycle, how it would overcome the barriers and how it will deliver outputs. For this reason, the TOC has been initially articulated in 4 diagrams: baseline, stakeholders/ actors, project outputs and risk and barriers. Upon the request, to make the TOC clearer, we developed an alternative diagram, which is now replacing, in the CER, the previous one, in the Page 22 of the PD and Page 30 of the CER.

Project description summary

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

Secretariat Comment at CEO Endorsement Request

(Karrer, Aug 2, 2023). No. It is still not clear that the project will go beyond developing a roadmap to actual policy change. Table B Component 1 Outcome 1.1. notes NAP implemented, but the related outputs are not implementation actions. Output 1.1.1 is about identifying problems, Output 1.1.2 focuses on guidelines (not actual changes in regulations or incentives), and Output 1.1.3 identifies funding mechanisms. Activities around establishing and enforcing regulations and incentives need to be included to implement the NAP. Please edit Table B and ensure text is consistent.

In the text, the term 'circulars' is not widely recognized as meaning establishing regulations, policies, and incentives. Given this document is shared beyond Viet Nam, please add a footnote making it clear this is your meaning or revise the text.

Regarding face masks ? Note that the GEF does not fund waste to energy activities because the incinerators release harmful chemicals, including POPs. We are focused on waste-reducing measures, including bans, reuse (refill, repair, rent, repurpose, etc) and recycling

systems. Can this activity be altered to promote the use of reusable face masks that can be washed and reused? Or else at least redesign to recyclable material?

(Karrer, July 17, 2023). Please address the following points:

Overall Component 1 is very important with the outcome of NAP implementation; however, the outputs do not seem to support NAP implementation. The outputs are identifying impacts, developing indicators and exploring funding, rather than implementation measures, such as establishing new policies, regulations, incentives, standards and guidance. As the baseline section notes, "policies are needed to reduce the input of low-value plastic products" (CER p37). The World Bank analysis provided a very clear list of recommendations on what to restrict (CER, p37). The project outputs, therefore, need to reflect implementation measures such as setting restrictions, guidelines, policies, and incentives to eliminate unnecessary items and foster reuse. Encouragingly, the Associated Baseline Projects text (CER p29) notes plans to work on regulations, "The project however will intervene at regulatory level with revision and development of NAP roadmap, as well as implementation of EPR, aiming among others at establishing a technical dialogue with the industries through their PRO mechanism to reduce the amount of plastic imported or placed in the market in Viet Nam through a better regulation on packaging and banning of SUP." Further, the PD section also references regulations, "improvement of regulation through the definition of guidance and implementing circulars" (CER p 42) although the types of regulations are not specified and it's unclear what is meant by "implementing circulars." The section on inputs (CER, p42) also notes regulatory plans, "Through the implementation of the project, inputs consisting in technical assistance, knowledge sharing, financial contribution, technology and equipment, legal assistance to update relevant regulations will be provided". These plans need to be reflected in the project outputs. Further the text under Results (CER, p42) for Outcome 1.1 notes, "practical and target-based road map for the implementation of the NAP developed; secondary norms and circulars developed, promulgated, and enforced to render the NAP implementable and operational"; however, a road map is not mentioned in the Section B PD outputs. There is one final listed activity 1.1.3.3. that notes it will "Support the implementation of NPAP (National Plastic Action Partnership), mobilize funding and collective actions and technical guidance for reduction of the release of plastic waste in the environment", but no explanation of activities to achieve implementation. It seems there's a disconnect between what's included in Section B PD outputs and the rest of the text. Please revise the outputs so that they include establishing new policies, regulations, incentives and standards for NAP implementation. In doing, so please ensure consistency with the rest of the document text.

Also related to Component 1, it is unclear why an assessment needs to be conducted when the World Bank project already conducted an assessment and produced recommendations. Also, a national action plan has already been developed, so why can't the project pursue the actions in the plan? There is a brief explanation that the WB and the NAP are not sufficient, but it seems that we're putting a lot of resources and effort into repeating this work with yet another assessment.

For Component 1 output 1.1.3 please consider funding mechanisms such as impact investors, MDB loans, and incubators/accelerators as requested in the PIF review.

Based on the description of Component 2 (p50), it seems component 2 is where systems will be put in place working with the private sector, such as grocery stores. However, the title notes capacity building. Please reconsider the title.

The project notes it will focus on the food and beverage sector, but then the explanation of Component 2 (p50) includes activities related to face masks and the fishing gear. Adding in a whole new sector and consequently more activities and a new suite of stakeholders (health sector for masks, fishing industry for fishing gear) will weaken this project's efforts. Please revise to focus on food and beverage sectors.

Components 1 and 2 in considering building the enabling environment with national and provincial policies, regulations, incentives and standards also needs to consider setting public procurement policies. The government as a purchaser can be a significant influencer in driving market demand for circular solutions, such as requiring all government contracts to food vendors be with reusable dishware.

In Component 2 there is emphasis on switching to biodegradable and compostable materials as an alternative to plastics. Biodegradable materials are widely criticized as an alternative because: 1) they still are disposable and, therefore, require high, continuous resource extraction compared with reusables; and 2) there is no standard for 'biodegradable' materials and consequently they range in requirements to degrade most of which are not found in landfills and often do not degrade in fresh or marine waters. Regarding 'compostable' materials, they have the same concern regarding high, continuous resource extraction and degradability in water. There are certification schemes for 'compostable materials', which require commercial grade composting facilities. Do such facilities exist in Viet Nam and is there a reliable system for collection and transport to these facilities? If not, then this is not a viable option and focus needs to be on eliminating unnecessary plastic products and switching to reusable options. Plans to switch from disposable plastic to other disposable materials need to be rethought.

Component 3 is focused on sharing the project experience, M&E; however, it also includes public awareness campaigns at the national level, which is outside the scope of sharing project experience. It would seem public awareness efforts would fit in Component 1 related to national-level efforts. Also public awareness raising is critical at the provincial level and needs to be included in Component 2 to promote the circular solutions to consumers.

Agency Response

Agency response (8 August 2023):

We noted that the Output 1.1.1 is about identifying problems related to COVID-19, as this closely links to the title of the project in the context of COVID-19 recovery. We would like to clarify further on Output 1.1.2, which is to make the NAP actionable. Actually, regulations and incentives have been identified in 04 key tasks of the NAP including: (i) Upstream: advocacy, behavior change, awareness raising; (ii) collection and treatment of waste and plastic; (iii) Waste control at source: survey, monitoring of plastic leakage in different sectors; (iv) promote studies and research, technology transfer. Beside these tasks in the NAP, we have elaborated further in other task mentioned in country's master plan to tackle plastic pollution in the PM's Decision 1316 such as: (i) Requesting provinces to issue incentive mechanism for reducing single use plastic; (ii) reviewing taxation system to restrict the use of single use plastic bags. One key regulation that can be considered as key measure is EPR scheme, which has been set foundation in the Law on Environmental Protection 2020, but not yet actionable. Therefore, it is proposed in the Project to accelerate this in Output 1.1.3, aiming to leverage EPR scheme funding and explore other funding source to implement the NAP. For better clarification, we have updated the text in Output 1.1.2 and activities (PD p.31 and CEOER p.2, p.33)

The term 'circulars' has been clarified as footnote at the Output 1.1.2 (PD Page 31 and CEOER Page 33)

Regarding facemasks: We don't envisage to demonstrate recycling of facemasks through energy recovery in incinerators. Indeed the project does not envisage at any stage the use of incinerators, and even the co-financing associated to the development of an incinerator has been removed. All references to face masks have now been removed from the PD and CER. Changes have also been made to Annex 8 (p.1, p.6).

Agency Response 1 August 2023

Overall Component 1 is very important with the outcome of NAP implementation; however, the outputs do not seem to support NAP implementation. The outputs are identifying impacts, developing indicators and exploring funding, rather than implementation measures, such as establishing new policies, regulations, incentives, standards and guidance.

Agency response: Under activity 1.1.2.1, the project clearly identifies *?, including relevant indicators and secondary norms and circulars as needed to render the NAP implementable and operational*. A circular refers to a legal document issued by ministerial level to implement a specific policy, here is the NAP. This means rendering the NAP operational and directly implementable, which is to accelerate the NAP implementation. In terms of policy: it is suggested at the Activity 1.1.2.2 to develop a guideline and a circular on plastic survey; and activity 1.1.3.1 to develop a circular to implement EPR framework. Actually, all of these activities are to make the NAP actionable and implementable. At the time of Project implementation, it would be 5 years of NAP implementation, hence would be good chance for the Government to improve tools and measures to accelerate implementation in the next stage.

As the baseline section notes, "policies are needed to reduce the input of low-value plastic products" (CER p37). The World Bank analysis provided a very clear list of recommendations on what to restrict (CER, p37). The project outputs, therefore, need to reflect implementation measures such as setting restrictions, guidelines, policies, and incentives to eliminate unnecessary items and foster reuse.

Agency response: Thank you. This is indeed the intention of component 1. In the description of output 1.1.1 is stated "While national level actions will be targeting policy and guidelines, local level actions are designed to be actionable, which then will be piloted in the project site of Binh Dinh province". Especially the Output 2.1.2: Schemes to reduce single use plastic in the food and beverage sectors supported, including (i) upstream prevention of SUP through command-and-control instruments such as regulations banning use in particular sub-sector

Encouragingly, the Associated Baseline Projects text (CER p29) notes plans to work on regulations, "The project however will intervene at regulatory level with revision and development of NAP roadmap, as well as implementation of EPR, aiming among others at establishing a technical dialogue with the industries through their PRO mechanism to reduce the amount of plastic imported or placed in the market in Viet Nam through a better regulation on packaging and banning of SUP." Further, the PD section also references regulations, "improvement of regulation through the definition of guidance and implementing circulars" (CER p 42) although the types of regulations are not specified and it's unclear what is meant by "implementing circulars."

Agency response: Well noted on this point. UNDP will work side by side with the regulators (MONRE) to identify the best solutions for implementing circulars by sector. In Vietnamese policy framework, circulars are policy guidelines issued by ministries to implement government policy. In this case, it refers to ministerial circular to implement EPR policy, which is how the EPR money will be collected and spent. The EPR policy is in place, but need a circular to be in place to be actionable. At this stage, specifying in detail what would be the implementing circulars is not advisable but will be expedited during implementation, especially after successful interventions in Binh Dinh province under the Component 2.

The section on inputs (CER, p42) also notes regulatory plans, "Through the implementation of the project, inputs consisting in technical assistance, knowledge sharing, financial contribution, technology and equipment, legal assistance to update relevant regulations will be provided". These plans need to be reflected in the project outputs.

Agency response: The sentence on inputs to which the comment refers is a very concise summary of what the project intends to do. It has been written based on project description, therefore all the items listed in that sentence are actually detailed in the project description. For instance, as far as technical assistance is concerned, all the proposed outputs include technical assistance. This is indeed implicit, however to clarify, we included the term "Technical assistance" in the output descriptions.

For Knowledge sharing: the entire output 3.2.1: *Knowledge exchange with other cities and provinces in Viet Nam through Viet Nam NPAP and other country's plastic partnerships facilitated?* and output 3.2.2 *Knowledge exchange with other ASEAN countries through the ASEAN Working Group on Coastal and Marine Environment and wider lessons sharing through IW LEARN facilitated.?* are about knowledge sharing.

For Financial contribution: beside the input from the GEF, establishing rules for the mobilization of the already available EPR funds will provide a significant source of financing to project activities, as explained in Output 1.1.3, activity 1.1.3.1 *Assessment of the nationwide EPR funds demand for plastic collection, development of circulars, guidelines on eligible EPR fund beneficiaries, and capacity building of EPR on fund disbursement. This activity will result in suitable SOP and guidelines for EPR disbursement to enterprises and activities that support upstream activities to reduce plastic usage and waste generation?* Notably, at the time of project drafting, unspent EPR funds summed up to 16.46 million USD. Concerning technology and equipment: these are described under Output 2.1.1. and will concern waste collection and sorting equipment (activity 2.1.1.1), equipment and technologies for the recycling of low-value plastic waste (activity 2.1.1.3.) and the equipment for scaling up the waste collection in the fishing sector (activity 2.1.1.4). Technologies (not necessarily "machines" but indeed green technological solutions) are also proposed under output 2.1.2 reported below for convenience:

" Identify and pilot activities in Binh Dinh in cooperation with key enterprises, including enterprises operating in the tourism and fishing-sectors and in the food/beverage sector which are directly related to the up-stream prevention of single use plastic (for instance introduction of reusable containers in fishing instead of Styrofoam boxes, banana leaf packaging in supermarket; design of smart food / beverage packaging particularly suited to the climate condition of Viet Nam; incentive to reuse bags available at home for carrying goods instead of plastic bags or new shoppers; prevention of bottled waters and other plastic items in hotels; pilot the selling of bulk beverages and other goods instead of bottled products, incentive of reusable food ware for food stalls, cafes, restaurants take-away and delivery. Some agreements (for instance with the tourism association in Quy Nhon) have been already established during stakeholder consultation held during project preparation.

" Planning for the ban of single-use plastic, supported by incentive schemes for alternative materials for plastic. Again, it is important to stress that the ban of single-use plastic needs to be supported by the identification of materials or alternatives which have a reduced impact in terms of GHG releases. Therefore, the incentive scheme will consider not only the reduction of

impact to the sea, but also the reduced climate change impact of the alternative. The province will be therefore assisted by the project in the science-based assessment (through existing LCA analyses for specific plastic items) of environmentally sound alternatives to SUP, which may include not only material replacement, but also behavioral change.

? Implementing and/or scaling up some of the solutions identified by the EPPIC project, which is funded by the Norwegian Government. Through EPPIC, many innovative solutions have been identified and helped to expand at market level such as Refill (sell services instead of selling goods), cassava straws (straws made of cassava to use in replacement of plastic one), breathable bags (made of environment friendly materials for food wrapping), digital platform mobile application to encourage people to live greener and say no to plastic, exchange plastic with products.

Concerning legal assistance, this obviously concerns all the activities related to the development and upgrading of secondary norms and circulars envisaged under component 1 and 2.

Further the text under Results (CER, p42) for Outcome 1.1 notes, "practical and target-based road map for the implementation of the NAP developed; secondary norms and circulars developed, promulgated, and enforced to render the NAP implementable and operational"; however, a road map is not mentioned in the Section B PD outputs.

Agency response: This is indeed output 1.1.2 "NAP operationalized through the development of indicators and corresponding baselines and targets". The fact that a roadmap will be delivered emerges both from the output description "*Currently the NAP is an overall strategy and does not include a practical implementation plan or roadmap. The project intends to work with MONRE to develop an implementable roadmap for NAP implementation, together with the needed ancillary regulations*" and from the title of Activity 1.1.2.1. under the same output "*A target-based roadmap for NAP implementation developed, including relevant indicators and secondary norms and circulars as needed to render the NAP implementable and operational*".

There is one final listed activity 1.1.3.3. that notes it will "Support the implementation of NPAP (National Plastic Action Partnership), mobilize funding and collective actions and technical guidance for reduction of the release of plastic waste in the environment", but no explanation of activities to achieve implementation. It seems there's a disconnect between what's included in Section B PD outputs and the rest of the text. Please revise the outputs so that they include establishing new policies, regulations, incentives and standards for NAP implementation. In doing, so please ensure consistency with the rest of the document text.

Agency response: Well noted and agreed. A paragraph has been added to the Output 1.1.3 explaining how the Project will support the NPAP, especially the Task Force: Innovation and Finance. Promote innovative solution, especially alternatives to single use plastic, connect to finance to implement solutions is one of key missions under this Task Force and the NPAP.

Also related to Component 1, it is unclear why an assessment needs to be conducted when the World Bank project already conducted an assessment and produced recommendations. Also, a national action plan has already been developed, so why can't the project pursue the actions in the plan? There is a brief explanation that the WB and the NAP are not sufficient, but it seems that we're putting a lot of resources and effort into repeating this work with yet another assessment.

Agency response: Thank you. The WB study proposed lines of actions (like for instance ?restrict the use of certain SUPs for consumption in restaurants, cafeterias, etc.; fee charging for certain products; market bans; implementation of ?transitional measures? for EPS box banning? which need further detail and assessment to be implementable. For instance, gathering information on LCA of alternatives is considered a key step to avoid the selection of alternatives which are environmentally worse than the SUP in term, among others, of GHG release or generation (Activity 1.1.1.2). The project also intends to analyze the effect of the COVID-19 pandemic on the increase of SUP use, in order to identify solutions and alternatives (activity 1.1.1.1.) More importantly, these interventions will be identified and applied in a specific location of Binh Dinh province under Component 2, before review and uptake into policy level.

For Component 1 output 1.1.3 please consider funding mechanisms such as impact investors, MDB loans, and incubators/accelerators as requested in the PIF review.

Agency response: This has been updated as part of the support to NPAP. Unlocking finance is one of six impacted areas under NPAP, therefore supporting NPAP and especially Task Force on Innovation and Finance will facilitate the exploration of funding from investors, banks and others.

Based on the description of Component 2 (p50), it seems component 2 is where systems will be put in place working with the private sector, such as grocery stores. However, the title notes capacity building. Please reconsider the title.

Agency response: Well noted and agreed. We have updated the title by removing ?Capacity Building? part. The title of the Component 2 now: Component 2: Behavior

change in relevant sectors (e.g., food and beverage) to accelerate the transition towards a Circular Economy with interventions in Binh Dinh Province

The project notes it will focus on the food and beverage sector, but then the explanation of Component 2 (p50) includes activities related to face masks and the fishing gear. Adding in a whole new sector and consequently more activities and a new suite of stakeholders (health sector for masks, fishing industry for fishing gear) will weaken this project's efforts. Please revise to focus on food and beverage sectors.

Agency response: We fully agree with you and would like to clarify as follow:

- Under activity 2.1.2.1, the project intends to pilot the replacement of EPS boxes used to preserve fish products (part of the Food and Beverage) as those plague many Vietnamese beaches and river coasts. Under activity. Activity 2.1.1.4. it intends to scale up an existing initiative which involve the collection of waste generated by fishermen during fishing activities (usually water and other beverage bottles are dumped in the ocean). The project does not intend to undertake any action on the fishing gear sector.

- As from the title, the project design is about post COVID-19 recovery. The face masks are the ones abandoned in the environment or together with municipal waste by the general public, (not the ones disposed by healthcare facilities which go under HCW management) and are part of the 'low-value plastic' which need an urgent solution which is identified in component 2, Activity 2.1.1.3. *?Recycling / recovery of low-value plastic waste, including used face masks piloted and experience-based guidelines developed.?*

Components 1 and 2 in considering building the enabling environment with national and provincial policies, regulations, incentives and standards also needs to consider setting public procurement policies. The government as a purchaser can be a significant influencer in driving market demand for circular solutions, such as requiring all government contracts to food vendors be with reusable dishware.

Agency response: Well noted and this can be part of the Activity 1.1.1.2 on identification of measure to prevent plastic pollution from SUP. One of the measures is to promote Green Public Procurement, which has been addressed and planned in Mercury POP project GEF

ID: 10519, of which the Outcome 1.2. Development of a Green Financing Mechanism. The Project is about to start this July 2023. This information is added to Activity 1.1.1.2 in the PD (Page 30) and CER (Page 32).

In Component 2 there is emphasis on switching to biodegradable and compostable materials as an alternative to plastics. Biodegradable materials are widely criticized as an alternative because: 1) they still are disposable and, therefore, require high, continuous resource extraction compared with reusables; and 2) there is no standard for 'biodegradable' materials and consequently they range in requirements to degrade most of which are not found in landfills and often do not degrade in fresh or marine waters. Regarding 'compostable' materials, they have the same concern regarding high, continuous resource extraction and degradability in water. There are certification schemes for 'compostable materials', which require commercial grade composting facilities. Do such facilities exist in Viet Nam and is there a reliable system for collection and transport to these facilities? If not, then this is not a viable option and focus needs to be on eliminating unnecessary plastic products and switching to reusable options. Plans to switch from disposable plastic to other disposable materials need to be rethought.

Agency response: We fully agree with this principle. Indeed, there is no plan or activity under this project to support compostable plastic or biodegradable, especially under component 2. There is no emphasis on biodegradable or compostable plastic in component 2, rather the opposite. Therefore, whilst we agree to remove the co-financing related to incineration and biodegradable/compostable plastic, we need to raise the GEF attention toward the true policy envisaged by the project concerning the promotion of reuse and the avoidance of any worse alternative to SUP, and especially under component 2, which literally says *'prevention of single use plastic (for instance introduction of reusable containers in fishing instead of Styrofoam boxes, banana leaf packaging in supermarket; design of smart food / beverage packaging particularly suited to the climate condition of Viet Nam; incentive to reuse bags available at home for carrying goods instead of plastic bags or new shoppers; prevention of bottled waters and other plastic items in hotels; pilot the selling of bulk beverages and other goods instead of bottled products, incentive of reusable food ware for food stalls, cafes, restaurants take-away and delivery?'*

And also: *'Planning for the ban of single-use plastic, supported by incentive schemes for alternative materials for plastic. Again, it is important to stress that the ban of single-use plastic needs to be supported by the identification of materials or alternatives which have a reduced impact in terms of GHG releases. Therefore, the incentive scheme will consider not only the reduction of impact to the sea, but also the reduced climate change impact of the alternative.'*

Concerning the technology being developed under EPPIC, beside the Refill and the digital platform, we are glad to inform EPPIC project has recently completed the LCA assessment of the cassava straws and the breathable bath, considering as valid alternatives only the

cassava straws, therefore the breathable bags have been removed from the proposed solutions and removed from the ProDoc

Component 3 is focused on sharing the project experience, M&E; however, it also includes public awareness campaigns at the national level, which is outside the scope of sharing project experience. It would seem public awareness efforts would fit in Component 1 related to national-level efforts. Also public awareness raising is critical at the provincial level and needs to be included in Component 2 to promote the circular solutions to consumers.

Agency response: Thank you. Actually, awareness raising is already an independent outcome under the Component 3, separate from M&E. Public awareness activities in this component does not include traditional awareness raising on plastic and plastic pollution, it is intended to replicate positive results and good interventions that have been implemented in Component 1 and 2. Outcome 3.2 is designed to initiate and replicate best practices from Binh Dinh to other provinces, and from Viet Nam to other countries in the ASEAN region.

Well noted on your points and we think in Component 1 and 2, there are already some awareness raising activities integrated to different outputs. For instance, *Output 2.1.1: Plastic waste segregation at source?* will need to have its own activity on awareness raising, carried out by Women Union to encourage households doing home sorting; or *Output 2.1.2: Schemes to reduce single use plastic in the food and beverage sectors supported?* will need to work with hotels, restaurants and other plastic users in Binh Dinh to change their behaviors. This has been clarified and updated in these Output in PD (Page 33-34) and CER (Page 34-35)

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

Secretariat Comment at CEO Endorsement Request NA

Agency Response

Co-financing

4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat Comment at CEO Endorsement Request

(Karrer, Aug 2, 2023). Yes.

(Karrer, July 17, 2023). No. Co-financing needs to be for activities that contribute to the ultimate objective of fostering reduced production, consumption and waste ? i.e. circular economy solutions. The co-financing for the Bin Dinh Investment and Planning Department investment in incineration plants does not meet this expectation. Please remove.

Agency Response

Agency Response 1 August 2023

Well noted and this is agreed and the co-financing from Binh Dinh Investment and Planning Department has been removed from the ProDoc, CER

GEF Resource Availability

5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?

Secretariat Comment at CEO Endorsement Request (Karrer, July 17, 2023). Yes.

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 (Karrer, July 17, 2023). Yes.

Agency Response

Core indicators

7. Are there changes/adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?

Secretariat Comment at CEO Endorsement Request

(Karrer, August 2, 2023 & PPO ???). No. Regarding the amount of marine habitat under improved management, I appreciate the explanation, but you still have not justified how you are confident the entire coastline will benefit. Likely there are target entry spots, such as river mouths, that are the most polluted areas

and most likely to benefit. Please recalculate based on more realistic projections of where in the province will benefit, such as where there is typically litter leakage from rivers. It is better to underestimate and exceed the target than to underestimate and fall short.

(Karrer & PPO, July 25, 2023). No.

PPO: There is a discrepancy in reporting the target between core indicator table and the annex a (results framework). The target for CI.11 is different in CI table than annex A.

Karrer: There is no number under Indicator 9.8 Avoided residual plastic waste, but then there is an explanation in the subsequent paragraph text. Please add the total under Indicator 9.8 Avoided residual plastic waste.

Please consider the carbon reductions associated with this project since plastic production and burning releases carbon. The Plastic IP and/or the UNEP Latin America Plastic project may be useful references for calculations.

Estimating the entire coastline of the province will improve is unrealistic. Please recalculate based on more realistic projects of where in the province will benefit, such as where there is typically litter leakage from rivers.

Regarding the calculation for reduced residual plastic waste, the calculation needs to consider that not all collected plastic waste will be recycled. Only the amount that's actually recycled counts toward the subindicator.

Aug 8 2023 (ahume): Please address the following two comments:

The CI.11 target in the Core Indicator table still includes indirect beneficiaries. Annex A indicates a distinction between Direct and Indirect. Only Direct beneficiaries should be included in the Core Indicator table, exclusive of Indirect beneficiaries.

For CI. 6, the Core Indicator table and the related justification indicate a value of 5883 tons, whereas section 6 ?6) GLOBAL ENVIRONMENTAL BENEFITS (GEFTF) AND/OR ADAPTATION BENEFITS (LDCF/SCCF)? indicates a value of 5833. Annex A doesn?t indicate the value of CI6 consistent with the Core Indicator table.

Aug 9 2023 (ahume): Addressed.

Agency Response

Agency response: (8 Aug 2023) Noted. Quy Nhon City is the metropolitan area of Binh Dinh province, where most activities of the project will be undertaken. In the administrative area of Quy Nhon city there are two estuaries: (i) Con River flowing from the northwest to Quy Nhon City; and (ii) Ha Thanh river flowing from the southwest to Quy Nhon City, discharging on a coastline of 72km. Although very likely the impact of the project will go beyond this area, a conservative assumption is that the area influenced by such estuaries will benefit the most from the project implementation. Assuming a strip of 100mx72km, that will correspond to 720 ha.

This adjustment has been incorporated into relevant parts of the PD (p.58, p.64, p.100), the CER (p. 5-6, p. 42, p.82, p. 97), and the Core Indicator Sheet (row 97)

Aug 8 2023 (ahume): Please address the following two comments:

The CI.11 target in the Core Indicator table still includes indirect beneficiaries. Annex A indicates a distinction between Direct and Indirect. Only Direct beneficiaries should be included in the Core Indicator table, exclusive of Indirect beneficiaries.

Agency Response (8 Aug 2023):

? CI.11 in the Core Indicator has been updated with only direct beneficiaries of 100 males and 100 females.

For CI. 6, the Core Indicator table and the related justification indicate a value of 5883 tons, whereas section 6 ?6) GLOBAL ENVIRONMENTAL BENEFITS (GEFTF) AND/OR ADAPTATION BENEFITS (LDCF/SCCF)? indicates a value of 5833. Annex A doesn't indicate the value of CI6 consistent with the Core Indicator table.

Agency Response (8 Aug 2023):

? CI.6: The figure of 5883 tons has been updated in the Section 6, Annex A in PD (Page 60, 64) and CEOER (Page 81).

Agency Response 1 August 2023

PPO: There is a discrepancy in reporting the target between core indicator table and the annex a (results framework). The target for CI.11 is different in CI table than annex A.

Agency response: Added CI11 to Annex F in the CER (copied from the CI Excel sheet)

(Karrer, July 17, 2023). There is no number under Indicator 9.8 Avoided residual plastic waste, but then there is an explanation in the subsequent paragraph text. Please add the total under Indicator 9.8 Avoided residual plastic waste.

Agency response: Thank you for this comment. Initially that indicator was not included as the project was expected to be implemented under the GEF7 IW focal area. Upon the request,

the 2,000 tons of plastic waste avoided has been placed under indicator 9.8 as suggested, in the template of GEF8 indicator.

Please consider the carbon reductions associated with this project since plastic production and burning releases carbon. The Plastic IP and/or the UNEP Latin America Plastic project may be useful references for calculations.

Agency response: We fully agree and have estimated the co-benefit deriving from the avoided CO₂e as follows:

GHG avoidance:

1. **CO₂e release in the production stage.** The EIONET report on "Greenhouse gas emissions and natural capital implication of plastic" (Eionet Report "ETC/WMGE 2021/3") provides an estimate for the emission of CO₂ from plastic production of 2.94 kgCO₂e/Kg for PET granules, 1.98 kgCO₂e/Kg for LDPE granules, and 3.68 kgCO₂e/Kg for general purpose polystyrene. In the absence of more detailed data for Vietnam, assuming an average among the 3 type of plastic, it may be assumed an average emission factor of 2.8 kgCO₂e/Kg in the production stage. It should be also considered that the CO₂e emission from plastic manufacturing in Vietnam may be different from the one estimated for Europe.

2. **Generation of CO₂e from Incineration or open burning.** Conversion of C to CO₂ based on the molecular weight (44/12). One kg of C generates $44/12 = 3.67$ kg of CO₂. Content of C in plastic: based on (Smeaton, Craig. (2021). *Augmentation of global marine sedimentary carbon storage in the age of plastic. Limnology and Oceanography Letters*. 6. 10.1002/lol2.10187) the six most common types of plastic contain 74.63% - 15.81% of C. Based on the above, the combustion of one kg of plastic generates up to 2.71 kg of CO₂. For each kg of plastic waste avoided (i.e. which is not manufactured), around $(2.8+2.7) = 5.5$ kgCO₂e/Kg would be avoided. As the project intends to reduce by 500 tons the amount of plastic entering the Vietnam market, that would result in the avoidance of 2750 t CO₂e

3. **Generation of CO₂e from recycling.** Recycling of plastic bottle into pellets consumes around 540 kJ of energy/kg (The IMPEE project: *Energy balance in recycling one PET bottle - the Cambridge-MIT Institute*), assuming a thermal to electricity conversion efficiency is 0.3, this will represent 1800 KJ; translated in coal equivalent this is approximated to 0.06148 kg of coal, and therefore $0.0648*0.66$ (CO₂ in one kg of coal) = 0.15 kg CO₂ per kg of recycled PET. Assuming that the average value for the recycling of mixed plastic is twice of the one for PET, this means that for each kg of plastic which is recycled instead of burnt, the amount of CO₂ avoided is in the order of $(2.71 - 0.3)$ kg per kg of plastic which is recycled instead of incinerated. The project intends to collect and recycle of 1300 tons of plastic waste, preventing their incineration, resulting therefore in the avoidance of 3133t CO₂e (avoided

incineration or open burning). The avoided CO₂ from the recycling of low value plastic (200t under the project) would depend from the specific technology selected and is therefore not accounted here.

4. In total, the plastic avoidance plus the collection at source and recycling would allow for a total saving of CO₂e emission estimated in 5833 t of CO₂e.

Estimating the entire coastline of the province will improve is unrealistic. Please recalculate based on more realistic projects of where in the province will benefit, such as where there is typically litter leakage from rivers.

Agency response. We do agree on the fact that the estimate is very rough. However, in 2020 UNDP VN undertook a field test along a riverbank near Halong bay of a cost-effective methodology to measure the amount of plastic on contaminated beaches and riverbanks. (*C.Lupi, Photo Survey on marine and mega litter along Vietnamese coast ? Methodology testing, prepared for UNDP on May 27, 2020; and Carlo Lupi, Photo survey on marine macro and mega litter along Vietnamese coasts. Methodological concept notes, prepared for UNDP, April 12, 2020*). One of the results of the test was that 5,7 kg of plastic are enough to badly contaminate a strip of riverbank in the order of 300m² (3x100 m). The density of plastic waste (bags, styrofoam, PET bottles) is extremely low and therefore a small mass of plastic waste has indeed the capacity to contaminate an extremely wide area. In addition, the project also supports reducing plastic pollution from fishing boats. On another perspective, we should notice that according to Binh Dinh DONRE, the daily solid waste generation amount in the province is about 1,011 tons/day, of which around 10% (101 t) are plastic. The project therefore has an impact comparable to the avoidance of 20 days of plastic of the whole province, or 5.5% the amount of plastic waste generated in one year. This is the average improvement that could be expected over the provincial coastline. Although we acknowledge that is difficult to predict specifically the length of the coast which would benefit from the reduction of plastic released in the environment, theoretically 2000 tons of plastic removed from the environment could generate benefits for the whole province. Nevertheless, the Project will refine the value during the first 6 months of implementation.

Regarding the calculation for reduced residual plastic waste, the calculation needs to consider that not all collected plastic waste will be recycled. Only the amount that's actually recycled counts toward the subindicator.

Agency response. Currently, is estimated that informal recyclers recycle around major part of the plastic they collect, and dump or burn in the open the remaining part as low quality plastic. That result in a very high pollution around recycling villages, as testified by the pictures attached to the CER. The project intends to increase the fraction of high quality plastic through collection at source, increasing therefore the recycling efficiency (activities 2.1.1.1, 2.1.1.2 and 2.1.1.4, and demonstrate the recycling of low quality plastic under activity 2.1.1.3). For this reason, it is assumed that all the plastic collected will be eventually recycled.

Part II ? Project Justification

1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?

Secretariat Comment at PIF/Work Program Inclusion

(Karrer, July 17, 2023). Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

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

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

Project Map and Coordinates

Is there an accurate and confirmed geo-referenced information where the project intervention will take place?

Secretariat Comment at CEO Endorsement Request

(PPO ???)

(PPO, July 25, 2023). No. In Annex D on Project Map and Coordinates, please consider inserting the geographic location of the site directly under the dedicated data entry field. This includes the Location Name, Latitude and Longitude.

Agency Response

Agency Response 1 August 2023

Added coordinates for Binh Dinh province.

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

NA

Agency Response

Stakeholders

Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?

Secretariat Comment at CEO Endorsement Request

(Karrer, Aug 2, 2023). No. The list of stakeholders emphasizes downstream players, such as the Recycling Plastic Associations, suggesting this will be the focus of the project. Upstream solutions need to be emphasized. Please investigate and add reuse companies to engage and promote. As an example, this recent article (<https://vovworld.vn/en-US/sunday-show/reuse-a-cheap-and-highly-effective-solution-for-promoting-the-circular-economy-in-vietnam-1161384.vov>) notes the company Vietcycle Corporation, which is providing reusable, refillable packaging.

(Karrer, July 17, 2023). No.

The stakeholder engagement table explanation (p 63) and the Stakeholder Engagement Plan (Annex 8) have a detailed, clear plan for engaging the national government. Each ministry is listed separately. These seem well engaged and understood. In stark contrast, the rest of the stakeholder groups lack detail or plans. The provincial level government agencies is all together as one ?local government agencies at provinces (DOIT?)?. The private sector also notes only ?restaurants and hotels? without listing specific businesses or even associations much less their role in the project. Oddly the fishing industry has detail about reviewing plans related to collecting marine litter, which the GEF doesn?t fund. Each of these (e.g. restaurants, groceries) is critical given Component 2 private sector focus in the province. Similarly, the NGOs and CSOs are also listed all together without mention of specific organizations or their specific roles. The lack of detail is worrying as to how engaged these groups have been in the year of planning. Each relevant NGO, private sector entity and provincial agency should have been consulted at this point and have its own explanation.

Agency Response

Agency response: (8 Aug 2023) Actually, Vietcycle is a company playing as the Secretariat for Plastic Recycling Sub-Association under Vietnam Plastic Association. UNDP has been working with them to promote support to informal sector, refill stations and recycling of some plastic waste into fuel. Vietcycle is potential service provide to work with the Project in engagement of informal waste workers, pilot refill solutions from them as well as upstream solutions from EPPIC project (alternative products, Refills etc). Upon the comments, we updated this in the Stakeholder Management Plan (p.8) and Partnership (PD Page 42 and CEOER Page 51)

Agency Response 1 August 2023

Agency response: We would like to clarify this as follow:

? Local Government Agencies at provinces (DOIT, DONRE and DOLISA): This has been updated at the Page 7 of the Annex 8 ? Stakeholder Engagement Plan. For further information, these are departments under other provinces, not Binh Dinh as Binh Dinh Provincial People?s Committee?s role is elaborated at a separate column at the Page 8.

? For private sector, it is stated in the Annex 8: *?Enterprises/companies play an important role in the development and implementation. During the PPG, Vietnam Plastic Associations, Fishermen Association, Binh Dinh Toursim Association representatives of numerous hotels, restaurants in Quy Nhon city and Binh Dinh Province have been identified the key in the project implementation?.* Further clarification has been added into the text in Page 7 of the Annex 8.

? We confirmed that the involvement of fishing industry does not concern the fishing gears. This is the requirement that fishermen need to bring back their waste (mostly plastic bottles and food containers). Please see the photos below for your information.

This is how fishermen prepare before one 10-15-day-fishing trip. The important point is they need to bring back empty bottles back to shore. In order to do this, we need to work with Fishery Association and Fishery Department to prepare policy, procedure and operation to make this happen.



- NGO & CSO: This part has been elaborated further following the consultation process during the

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

(PPO, July 25, 2023). No.

Please capture best practices on gender mainstreaming as well as any best practice on gender-specific intervention in Outcome 3.2.

Use of terms: Gender-disaggregated vs. sex-disaggregated data. Please ensure accurate understanding of these terms - the first one is non-binary; second is binary. Please make sure, when using "gender-disaggregated" that data on different genders are available to be collected.

Please clarify/reflect in Component 3 how the project will report on the Gender Action Plan.

Agency Response

Agency Response 1 August 2023

(PPO, July 25, 2023). No.

Please capture best practices on gender mainstreaming as well as any best practice on gender-specific intervention in Outcome 3.2.

Agency response: Added mentions of capturing gender best practices to Outcome 3.2 (Page 36 of PD/Page 36 of CER)

Use of terms: Gender-disaggregated vs. sex-disaggregated data. Please ensure accurate understanding of these terms - the first one is non-binary; second is binary. Please make sure, when using "gender-disaggregated" that data on different genders are available to be collected.

Agency response: Changed "gender-disaggregated" to "sex-disaggregated". We understand wording of indicators should be remained unchanged. So it still has references to data disaggregated by gender in some places

Please clarify/reflect in Component 3 how the project will report on the Gender Action Plan.

Agency response: Noted and updated the text in Component 3 (Page 35 of PD/Page 36 of CER), on reporting mechanism.

Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

Secretariat Comment at CEO Endorsement Request

(Karrer, Aug 2, 2023). No. As noted in the stakeholder engagement question, the list of stakeholders emphasizes downstream players, such as the Recycling Plastic Associations, suggesting this will be the focus of the project. Upstream solutions need to be emphasized. Please investigate reuse companies to engage and promote. As an example, this recent article (<https://vovworld.vn/en-US/sunday-show/reuse-a-cheap-and-highly-effective-solution-for-promoting-the-circular-economy-in-vietnam-1161384.vov>) notes the company Vietcycle Corporation, which is providing reusable, refillable packaging.

(Karrer, July 17, 2023). No.

In reading through the private sector engagement section (p81) there is more information; however, there continues to be a heavy emphasis on the fishing industry related to ocean clean-ups when the focus of the project is on the food and beverage sector. Related to the food and beverage sector, the Tourism Association is noted but without information on their interests or role in the project. Further, hotels and restaurants are only a few of the players in the food and beverage sector. There is mention of the Plastics Association but not what this entity is much less their role in the project. There is no mention of food and beverage industry companies ? food processing and packaging companies (local, global), grocers, hotels, restaurants. These companies were noted as priorities in the PIF review for PPG consideration. Please elaborate on the food and beverage sector companies and their engagement.

Please note that the private sector engagement section (p81) emphasizes the fishing industry related to ocean clean-ups, which is the ultimate downstream activity, which the GEF does not generally fund because of the futility of these efforts. Please remove.

Agency Response

Agency response: (8 Aug 2023) Actually, Vietcycle is a company playing as the Secretariat for Plastic Recycling Sub-Association under Vietnam Plastic Association. UNDP has been working with them to promote support to informal sector, refill stations and recycling of some plastic waste into fuel. Vietcycle is potential service provide to work with the Project in engagement of informal waste workers, pilot refill solutions from them as well as upstream solutions from EPPIC project (alternative products, Refills etc). Upon the comments, we updated this in Stakeholder Management Plan (p.8) and Partnership (PD Page 42 and CEOER Page 51

Agency Response 1 August 2023

- Tourism association part has been updated in the text at the Page 7 of Annex 8: ?Binh Dinh Toursim Association consisting of 78 members representing numerous hotels, restaurants in Quy Nhon city and Binh Dinh Province. These hotels and restaurants and normal eatery, especially fast food will be joining the plastic reduction programme as part of the Output 2.1.2.

- We would like to clarify the main partner the Project we will be working with is the Plastic Recycling Association, under the Plastic Association. This has been updated in the ProDoc Page 8 Partnership and respective Annex 8.

- Fishing industry: it is noted that the involvement of fishing industry does not concern the fishing gears. This is the requirement that fishermen need to bring back their waste (mostly plastic bottles and food containers).

Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

Secretariat Comment at CEO Endorsement Request
(Karrer, Aug 2, 2023). Yes

(Karrer, July 17, 2023). No.

The explanation of the risk of loss of jobs and income does not consider that if the project creates more collection and recycling facilities as planned, then these would require hiring people, which would increase employment. Further, if the project pursues reuse/refill systems,

those systems require not only collection and cleaning, but also redistribution of the products, which is more employment than recycling collection.

The loss of income to industry section also needs to consider that restrictions on plastic packaging would lead to new businesses, such as reuse/refill companies. If recycling is improved, then recycled material would be more readily available, which would reduce the costs to industry, which is a further benefit.

Regarding climate risks, in many developing countries climate change related flooding is exacerbated by plastic bags and other products damming up creeks and rivers. Is that a concern in the provinces? If so, then the project will actually help reduce the climate change impacts.

Agency Response

Agency Response 1 August 2023

The explanation of the risk of loss of jobs and income does not consider that if the project creates more collection and recycling facilities as planned, then these would require hiring people, which would increase employment. Further, if the project pursues reuse/refill systems, those systems require not only collection and cleaning, but also redistribution of the products, which is more employment than recycling collection.

The loss of income to industry section also needs to consider that restrictions on plastic packaging would lead to new businesses, such as reuse/refill companies. If recycling is improved, then recycled material would be more readily available, which would reduce the costs to industry, which is a further benefit.

Agency Response: Yes we agree. However, the risk of loss of jobs should be assessed within the same impacted categories. This is why the project will strive to directly support the most fragile category of informal waste collectors which may be directly affected by the project, by involving them in project activities. For industries, it may be expected a reduction in the

business of SUP manufacturing, which can be replaced by other businesses undertaken by different actors. The overall job counting could theoretically increase, however that will occur at the expense of one category in favor of another. We consider that the best solution is the enforcement and strengthening of the EPR policy which will progressively create resources for ?green? jobs, at the same time discouraging the business of SUPs.

Regarding climate risks, in many developing countries climate change related flooding is exacerbated by plastic bags and other products damming up creeks and rivers. Is that a concern in the provinces? If so, then the project will actually help reduce the climate change impacts.

Agency Response: We do agree. However, we do not have such information for Viet Nam and a quantitative estimation of that benefit would be very uncertain. It might be true in mega cities such as Hanoi or Ho Chi Minh City, but for such as medium size of Binh Dinh province, information is lacking. In order to be conservative and avoid overclaiming project benefits, we did prefer not to include this aspect.

Coordination

Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

Consistency with National Priorities

Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). Yes.

Agency Response

Knowledge Management

Is the proposed ?Knowledge Management Approach? for the project adequately elaborated with a timeline and a set of deliverables?

Secretariat Comment at CEO Endorsement Request

(Karrer, Aug 2, 2023). Yes.

(Karrer, July 17, 2023). No. In Component 3, please note plans to engage with IWLEARN, which is not reflected in the CER text. There needs to be mention of the 1% budget allocation to ensure clear that the project staff will engage with IWLEARN.

Agency Response

Agency Response 1 August 2023

Indeed, we have incorporated the engagement with IWLEARN in many parts of the CER,

especially the Output 3.2.2: *?Knowledge exchange with other ASEAN countries through the*

ASEAN Working Group on Coastal and Marine Environment and wider lessons sharing

through IW LEARN facilitated?. This also include the text ?The project will also set aside 1%

of the budget to facilitate lessons, case studies and project experience sharing through the IW

Learn Platform created to exchange knowledge between GEF International Waters projects,

and to participate in global conferences, as deemed appropriate? in the page 37 of the CER.

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

Agency Response

Monitoring and Evaluation

Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?

Secretariat Comment at CEO Endorsement Request

Agency Response

Benefits

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

Secretariat Comment at CEO Endorsement Request

(Karrer, July 17, 2023). No.

There is mention of jobs from recycling, but no mention of the benefits from reuse/refill systems. Reuse/refill systems are an important opportunity for livelihoods as the systems require not only collection and handling at the facilities (similar to recycling) but also redistribution. Given concerns regarding loss of livelihoods among waste pickers, it is important to highlight creating these reuse/refill systems targeting waste pickers for laborers. In short, reuse/refill systems have the potential for both environmental benefits by reducing

resource extraction and waste and socioeconomic benefits through employment and business opportunities.

Also, the Benefits section notes various actions that are heavy on downstream, including clean-ups which this project is not funding.

Agency Response

Agency Response 1 August 2023

Thank you for the suggestion, this is noted and the option to give informal waste workers the opportunity to work in the reuse/refill sectors promoted by the project has now been included under Outputs 2.1.1 (Page 32 of PD/Page 32 of CER) and 2.1.2 (Page 33 of the PD/Page 34 of the CER)

Annexes

Are all the required annexes attached and adequately responded to?

Secretariat Comment at CEO Endorsement Request
(Karrer, July 17, 2023). Yes.

Agency Response

Project Results Framework

Secretariat Comment at CEO Endorsement Request

Agency Response

GEF Secretariat comments

Secretariat Comment at CEO Endorsement Request

Agency Response

Council comments

Secretariat Comment at CEO Endorsement Request

Agency Response

STAP comments

Secretariat Comment at CEO Endorsement Request

Agency Response
Convention Secretariat comments

Secretariat Comment at CEO Endorsement Request

Agency Response
Other Agencies comments

Secretariat Comment at CEO Endorsement Request

Agency Response
CSOs comments

Secretariat Comment at CEO Endorsement Request

Agency Response
Status of PPG utilization

Secretariat Comment at CEO Endorsement Request

Agency Response
Project maps and coordinates

Secretariat Comment at CEO Endorsement Request

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

Secretariat Comment at CEO Endorsement Request
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
(Karrer, Aug 2, 2023). No. Please address remaining comments.

(Karrer, July 25, 2023) No. Please address noted comments.

(Hume, Aug 8, 2023) No. Please address remaining two comments

Review Dates

	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
First Review	7/17/2023	8/1/2023
Additional Review (as necessary)	8/2/2023	8/9/2023
Additional Review (as necessary)	8/8/2023	
Additional Review (as necessary)		
Additional Review (as necessary)		

CEO Recommendation

Brief reasoning for CEO Recommendations