



# Global Opportunities for Long-term Development of ASGM in Sierra Leone

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10838

**Countries**

Sierra Leone

**Project Name**

Global Opportunities for Long-term Development of ASGM in Sierra Leone

**Agencies**

CI

**Date received by PM**

11/2/2022

**Review completed by PM**

5/29/2023

**Program Manager**

Anil Sookdeo

**Focal Area**

Chemicals and Waste

**Project Type**

## PIF CEO Endorsement

### Part I ? Project Information

#### Focal area elements

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

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

Project description summary

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

Secretariat Comment at CEO Endorsement Request Yes

Agency Response

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

Secretariat Comment at CEO Endorsement Request N/A

Agency Response

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

While the co-financing amounts are confirmed they are all in kind and there is none from the private sector. Please clarify how these commitments will be maintained and contribute to the project and what steps will be taken during the implementation of the project to bring in private sector co-financing.

May 29, 2023 - Comment cleared.

### Agency Response

5/26/2023

Generally, the section on private sector engagement has been strengthened. Additional clarification provided below:

The EPA has a mandate for environmental monitoring which includes issues related to mercury use. The EPA has an annual budget and will deploy this as part of co-finance throughout the project period, it is not anticipated that there will be change in ability to co-finance as the EPA was created by an act of parliament and budgeted for. In addition, the EPA will work with other government agencies and private sector to identify other sources of co-finance to ensure maximum impact and sustainability beyond the project period.

During implementation the project will take deliberate efforts through awareness raising and outreach to have private sector contribute to this project. Specifically, efforts will be made to get support on clean gold mining technologies and areas to pilot the Jurisdictional Approaches.

#### **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 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 An account has been provided.

### 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

The increase in core indicator 4 is welcomed. There has been a downward revision of the core indicator 9 target on mercury, please clarify why.

May 29, 2023 - Comments cleared

### Agency Response

5/26/2023

Core Indicator 9 target has remained unchanged since the concept. The Concept stated: "In the NAP for Sierra Leone, a total average estimate of mercury use in its ASGM sector is reported of .352 MT/year. If the government's objective to eliminate mercury can be achieved during project implementation and using a replication factor of 3 for the reduction achieved after the project ends, **the total mercury use reduction achieved by the project is 1.408 tons.**"

## 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

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

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

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

Yes

Agency Response

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

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

5/26/2023

*This comment looks incomplete -we will follow up with the GEFSEC*

**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

Please see comments above on changes to the GEB's.

May 29 - 2023 - comment cleared

Agency Response

5/26/2023

See response above regarding Core Indicator 9 target.

**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

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

Yes

Agency Response  
**Child Project**

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

Secretariat Comment at CEO Endorsement Request

Yes

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

Yes

Agency Response  
**Gender Equality and Women's Empowerment**

**Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?**

Secretariat Comment at CEO Endorsement Request

Yes, however please summarize the key aspects of the plan in the portal.

May 29, 2023 - Comment cleared

Agency Response

5/26/2023

Summary provided

**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

The private sector strategy is not well articulated and should have a more thought out plan for engaging the private sector.

May 29, 2023 - comment cleared.

Agency Response

5/26/2023

The private sector engagement section has been significantly expanded, and concerns raised by the Council on this topic are simultaneously addressed.

The stakeholder engagement section also addresses private sector actors.

**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

Yes, several of the risks are high and mitigation measures have been proposed.

Agency Response

**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

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

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

Yes

Agency Response

**Monitoring and Evaluation**

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

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

**Benefits**



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

Secretariat Comment at CEO Endorsement Request

Yes

Agency Response

**Annexes**

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

Secretariat Comment at CEO Endorsement Request

All annexes except the response to Council comments have been included. Please provide a response to the council comments as they apply to all the countries included in the council approval.

MAy 29, 2023 - Comments cleared

Agency Response

5/26/2023

Responses have been included in the ProDoc's Appendix XIII.

**Project Results Framework**

Secretariat Comment at CEO Endorsement Request Provided

Agency Response

**CI-GEF 06/22/2023:**

**The results framework was realigned within the margins of the portal**

**GEF Secretariat comments**

Secretariat Comment at CEO Endorsement Request

Please see the following comments on compliance with GEF policy:

1. On project information:

a. Please change the expected implementation start to a future date taking into consideration that this is a child project so it will have to be circulated for a 4-week council review. Please adapt the expected completion date so that it matches the 60 months project duration.

b. Numbers in the agency fee field are missing. Please include. An agency fee has been included for the PPG in section F.

2. On the utilization of the PPG (annex C): please provide additional information on what the activity ?other direct costs? include. The item, as is, can?t be funded through GEF resources.

3. On the budget:

a. Please provide the name of the institution receiving funds for executing the stipulated activities in the ?responsible entity? column. Kindly change ?third party organization? for the name of the organization.

b. Several staff positions such as Project Manager and Project Lead are being charged across components and PMC. 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.

c. As per guidelines the finance and admin officer need to be charged to the PMC.

d. The use of GEF funds to purchase vehicles is strongly discouraged. Such costs are normally expected to be borne by the co-financed portion of PMCs. Any request to use GEF funding to purchase project vehicles must be justified by the exceptional specific circumstances of the project/program.

e. It seems office operating costs should be charged to the PMC.

4. On Stakeholder engagement It is well noted that the agency has submitted a stakeholder engagement plan. In addition, the Agency should provide summaries in the portal section of stakeholder consultations during PPG as well as on stakeholder engagement in implementation.

May 29, 2023 -Most of the comments provided on February 25th were addressed but others were not + there is a new comment (which was not presented in the previous version):

- New comment: Project Results Framework Table is off the margins ? this will prevent the reader to access the complete information and this child project needs to be circulated and subsequently posted. Please ask the Agency to amend.

- Still the agency did not provide additional information on what the activity ?other direct costs? include. The item, as is, can?t be funded through GEF resources.

- While travel capacity building, stakeholder engagement are partially charged to PMC, operation costs are not. Please amend.

Comments Cleared.

## Agency Response

5/26/2023

1 a. Start date and end date adjusted

1 b. agency fee numbers adjusted

2. ?Other direct costs? have been removed from the budget.

3 a. The Government (EPA) is the EA will receive 100% of the project funds. Budget ?Responsible entity? column names the EPA receiving funds for all project activities. Third party organization has been removed. The EA will manage all project activities. The change has been reflected throughout the document.

3 b. Unfortunately, this project only has in-kind co-financing and no grant co-financing that could cover those additional costs for the PMU staff, that said the government of Sierra Leone is contributing in-kind co-financing which includes government staff time for project management activities. Since the projects funds may not pay government officials, rather hire a project specific unit, this unit will be contributing to all outputs. Following GEF guidelines, Terms of Reference for positions charging to both components and PMC have been included in the ProDoc and detail how both the Project Lead and Finance and Administration Officer are contributing to technical and PMC components (note the ?Project Manager? line has been removed from the budget).

3 c. The Finance and Administration officer contributes to technical outputs through building the capacity of staff, consultants, and subs (in-kind) on the GEF minimum fiduciary standards and ensure training on prohibited practices, SEAH, and other policies and procedures, in addition to other contributions that go beyond the scope of project management as detailed in the full ToR found in the ProDoc.

Vehicle Purchase: We acknowledge that ideally the vehicle would be financed by the PMC co-financed portion of the project, however unfortunately the government of Sierra Leone

does not have the co-financing resources to pay for the purchase of the vehicle. However, they will indeed contribute to the overall cost of the vehicle by co-financing the insurance and drivers. We note that per GEF policy, vehicles may not be charged to PMC and the vehicles charged to the components are requested to directly deliver on the project technical outcomes. As part of CI's role as IA, the monitoring of proper vehicle usage will be done as part of the oversight. With the Vehicle Justification (ProDoc page 248), CI is thereby requesting approval from the GEF Project Manager to move forward with this item in the budget.

A vehicle justification letter was submitted and found on page 248 of the ProDoc (Appendix I). Per the vehicle justification letter, the exception is requested based on the significant cost savings of GEF project funds when compared with the cost of renting the vehicles necessary to achieve the project's outcomes, when considering the geographical region and difficult terrain that the project spans.

3 e. Office operating costs have been removed.

4. stakeholder engagement summary uploaded

June 8, 2023

Other Direct Costs are the following: Internet and Communications cards for project staff are costs that are spread across all components including PMC and M&E. Printing services for KM products are KM costs that are classified as other operating costs budgeted under KM, as it will contribute to KM activities. Fuel and maintenance are costs related to the vehicle, which we provided justification, and are not allowable under PMC. These are all costs contributing to the project activities under components.

Annex Project Budget has been updated in the portal with budget details.

The project results framework is now within the margins.

7/26/2023

*We have further addressed our comments and hope this clarification of our responses helps.*

*Comment 1: Project Results Framework Table is off the margins ? this will prevent the reader to access the complete information and this child project needs to be circulated and subsequently posted. Please ask the Agency to amend.*

CI-GEF Response 1: The Project Results Framework Table margins have been fixed in the portal. We have double checked and the margins are straight on our end.

*Comment 2: Still the agency did not provide additional information on what the activity ?other direct costs? include. The item, as is, can?t be funded through GEF resources.*

CI-GEF Response 2: The current budget in the portal does not include ?other direct costs?. Concerning ?other operating costs?, these items are broken down by line item. Internet and Communications cards, Printing Services for KM products, and Fuel and Maintenance for vehicle.

If this is a follow-up to the previous comment on ?other costs? under the PPG utilization, this table no longer lists ?other direct costs? and contains the following expenditures: Personnel-project design and coordination, International Consultant-ProDoc Development, and Travel-Meetings.

*Comment 3: While travel capacity building, stakeholder engagement are partially charged to PMC, operation costs are not. Please?amend.*

CI-GEF Response 3: Under ?Other Operating Costs? Internet and Communications cards for project staff are costs are spread across all components including PMC and M&E. Internet and communications costs are for full-time project staff and enable communication across regions and delivery of all components. Printing services for KM products are KM costs that are classified as other operating costs budgeted under KM, as it will contribute to KM activities. Fuel and maintenance are costs related to the vehicle, which we provided justification, and are not allowable under PMC. These are all costs contributing to the project activities under components.

#### **Council comments**

##### Secretariat Comment at CEO Endorsement Request

Council comments have not been included. Please provide a response to the council comments as they apply to all the countries included in the council approval.

May 29, 2023 - comment cleared.

##### Agency Response

5/26/2023

Refer to APPENDIX XIII: Response to Project Reviews: GEF Council Members

#### **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 Provided

Agency Response  
**Project maps and coordinates**

Secretariat Comment at CEO Endorsement Request Provided

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

Please see comments in the review sheet.

Comments cleared, however sending to PPO for concurrence with policy screen.

**Review Dates**

	<b>Secretariat Comment at CEO Endorsement</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>	<b>2/15/2023</b>	
<b>Additional Review (as necessary)</b>	<b>5/29/2023</b>	
<b>Additional Review (as necessary)</b>	<b>6/1/2023</b>	
<b>Additional Review (as necessary)</b>	<b>7/25/2023</b>	
<b>Additional Review (as necessary)</b>		

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**