



Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU)

Review PIF and Make a recommendation

Basic project information

GEF ID

11712

Countries

Ukraine

Project Name

Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU)

Agencies

World Bank

Date received by PM

9/18/2024

Review completed by PM

9/27/2024

Program Manager

Evelyn Swain

Focal Area

Chemicals and Waste

Project Type

FSP

GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

Realistic Timeline and Phased Approach: The project's ambitious 60-month timeline should be reassessed considering the complexities of operating in a conflict zone. A phased approach with clear milestones and contingency plans for potential delays would enhance feasibility.

One of the executing partners in Portal (Ministry of Environment) is not included in the LoE ? please ask the Agency to remove it ? this can be included later during project preparation.

ES, 10/28: Both issues have been addressed. Comments cleared.

Agency's Comments

Thank you.

We acknowledge the need to reassess the project's 60-month timeline, especially considering the complexities of operating in a conflict zone. A phased approach is proposed with additional explanations added in the section under ?Overall Risks?

The information about the executing agency has been updated in the Portal, in line with the LoE.

2. Project Summary

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 results?

Secretariat's Comments

The project summary is too long. The background information should be removed and moved lower in the project description to get it closer to the 250 word limit. Please also include GEBs in the summary.

ES, 10/28: The project summary portion is still over 600 words. Please revise it to the required length. The GEBs can be one sentence with the number of GEBs.

ES, 10/29: The project summary is still not a summary of the project. It is a summary of the problem. Please revise it to be a short summary of the project and include the amount of GEBs.

ES, 10/29: The project summary has been improved. Comment cleared.

Agency's Comments

Thank you.

Noted. However, there is no section in the portal for project description or project background/context, which is why the project summary is long. We have split the summary in 2 parts to create a distinction between the summary and the project description.

GEBs added in the summary.

Response to comments on 10/28:

Noted. Project Summary reduced to fit the required length. All the information are retained in the PCN/PID.

Response to comments on 10/29:

Noted. Project Summary edited to reflect the comments.

This project will enhance Ukraine's capacity to mitigate risks from hazardous pollution that have intensified due to the ongoing conflict. It will focus on building institutional capabilities, developing EU-aligned regulatory frameworks, and implementing pilot projects for the safe management and disposal of hazardous wastes, particularly polychlorinated biphenyls (PCBs), mercury, and asbestos. Through targeted interventions, the project will safely transport, dispose of, and potentially eliminate approximately 500 tons of hazardous waste across select pilot areas. Additionally, the project will support Ukraine in identifying further high-risk sites for remediation and developing sustainable waste management plans for long-term hazard reduction.

The project's interventions are expected to deliver significant Global Environmental Benefits (GEBs), including reduced exposure to hazardous pollutants for communities and ecosystems and strengthened national capacity for handling chemicals of global concern. These outcomes align with GEF's global priorities by reducing health and environmental risks associated with Persistent Organic Pollutants (POPs) and enhancing sound chemical and waste management. As part of Ukraine's EU accession efforts, these actions will also contribute to the country's alignment with

the Stockholm and Minamata Conventions, facilitating safer, more sustainable waste management practices nationwide.

3 Indicative Project Overview

3.1 a) Is the project objective presented as a concise statement and clear?

b) 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?

Secretariat's Comments

Asbestos is not currently funded by the GEF, however it can be addressed through co-financing. Please make it clear in the document that asbestos will be covered by co-financing.

ES, 10/28: Comment cleared.

Enhanced Data Collection and Assessment: While the project aims to address data gaps, it's crucial to employ robust assessment methods, potentially incorporating advanced technologies like remote sensing and drone surveys, to gather comprehensive data, especially in inaccessible areas.

ES, 10/28: Comment cleared.

Proactive and Inclusive Community Engagement: A more proactive and inclusive approach to community engagement is needed, ensuring affected communities are informed, involved in decision-making, and their concerns are addressed throughout the project's lifecycle.

ES, 10/28: Comment cleared.

Long-term Monitoring and Evaluation: A robust plan for long-term monitoring and evaluation of POPs and Mercury levels in the environment and human populations is crucial to track progress, identify emerging issues, and assess long-term health impacts.

ES, 10/28: Was this comment addressed? It is unclear?

Comprehensive and Sustained Capacity Building: Capacity-building efforts should be comprehensive and sustained, covering technical aspects, risk communication, community engagement, and data management, ensuring long-term project sustainability.

ES, 10/28: Comment cleared.

Focus on Prevention: In addition to remediation and management, the project should address the sources of POPs and Mercury contamination through promoting cleaner technologies, strengthening regulations, and raising awareness.

ES, 10/28: Comment cleared.

Agency's Comments

Thank you.

The PDO has a footnote explaining that asbestos related activities will be supported through co-financing, but to further stress this point the team has added a sentence in component 3 (subcomponent 3.2) that asbestos will be covered by co-financing.

Enhanced Data Collection and Assessment: The team agrees with the suggestion, and we have added respective language under the Phase 2 of the 'Overall Risk' section, where phases of the project are briefly described.

Proactive and Inclusive Community Engagement: The team agrees and has added respective language in the Section D.

Comprehensive and Sustained Capacity Building: The team agrees and has added respective language to subcomponent 1.2.

Focus on Prevention: Awareness raising activities will be incorporated via the capacity-building; policy reform supported by the project will help enable cleaner technologies in the post-war context. Respective language has been added to the section of subcomponent 1.1.

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments

Gender considerations were mentioned, and Gender Action Plan will be developed in the project. Please ensure when developing the Gender Action Plan, that it is budgeted, monitored, and reported on.

ES, 10/28: Comment cleared.

Agency's Comments

Thank you.

Gender Action Plan will be budgeted and monitored as suggest. Additional respective language included in Section D.

3.3 a) Are the components adequately funded?

b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments Yes.

Agency's Comments Thank you.

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments Yes, the situation is clear.

Agency's Comments Thank you.

4.2 JUSTIFICATION FOR PROJECT

a) Is there an indication of why the project approach has been selected over other potential options?

b) Does it ensure resilience to future changes in the drivers?

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?

d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

Please note in the portal document if and how the Private Sector will be involved in the project.

ES, 10/28: Comment cleared.

Agency's Comments

Thank you.

Information added in Section D, paragraph 42 of the updated document.

5 B. Project Description

5.1 THEORY OF CHANGE

a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?

b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments There is a concise theory of change that includes key assumptions.

Agency's Comments Thank you.

5.2 INCREMENTAL/ADDITIONAL COST REASONING

Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?

Secretariat's Comments Yes.

Agency's Comments Thank you.

5.3 IMPLEMENTATION FRAMEWORK

a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?

b) Comments to proposed agency execution support (if agency expects to request exception).

c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area

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

Secretariat's Comments

The implementation arrangements need to be added to the portal document. Only after they are added will the GEF comment on these arrangements.

ES, 10/28: Where were implementation arrangements added? I am still not finding a description in the portal.

ES, 10/29: The institutional arrangements are now included in the portal and are adequate.

Agency's Comments

Thank you.

Implementation arrangements added.

Response to comments from 10/28:

Thank you. Originally the information was only added in PCN document. The following section was added to the portal under project description below the ToC:

Implementation Arrangements

The key implementing agency would be the Department of Digital Transformation, Electronic Public Services and Waste Management in the Ministry of Environmental Protection and Natural Resources (MEPR). The Department will coordinate the implementation of the project with Environmental Safety Service. The MEPR will also secure cooperation with the Ministry of Restoration to work with communities where the project will be implemented.

The MEPR also plans to contract specialized international and national NGOs. The All-Ukrainian Non-Governmental Organization "Living Planet" is a prominent environmental organization with a rich history dating back to its establishment in 2003. With a focus on environmental protection, education, culture, and health, the NGO has been pivotal in fostering an ecological worldview and promoting sustainable practices across Ukraine. With two decades of experience, NGO Living Planet has been instrumental in shaping environmental policy and legislation in Ukraine, particularly in the context of EU accession. It has actively participated in political, economic, social, and cultural programs, advocating for sustainable consumption and the adoption of energy-efficient technologies. The NGO has also been involved in post-war recovery efforts, contributing to the development of regulatory acts and strategic initiatives essential for Ukraine's restoration.

Given the weakened institutional capacity and loss of key personnel and operational disruptions in MEPR. The Project will finance a TA to support project operations and capacity-building / training programs. The Bank will provide support on resolving emerging implementation issues and monitoring the adequacy of contractor performance. Considering the complexities of operating in a conflict zone and to enhance feasibility and adaptability, the project is structured with a phased approach and clearly defined milestones and contingency plans to accommodate potential delays. The project will be divided into the following phases:

1. **Phase 1 (Initial 12 months):** Focus on preparatory activities, including securing agreements with local stakeholders, conducting a detailed risk assessment, and setting up operational structures.
2. **Phase 2 (Next 24 months):** Pilot projects and initial capacity-building activities will be conducted. This phase will include establishing local data collection mechanisms and beginning limited on-ground interventions, with a strong focus on monitoring conflict-

related disruptions. The project will employ robust assessment methods, potentially incorporating advanced technologies like remote sensing and drone surveys, to gather comprehensive data, especially in inaccessible areas.

3. Phase 3 (Remaining 24 months): Scaling up of pilot interventions and capacity-building activities, ensuring comprehensive stakeholder engagement, and executing long-term monitoring and evaluation.

A robust contingency plan will also be incorporated to address any unexpected disruptions due to the conflict. This phased and flexible approach will ensure the project's success despite the challenging operating environment

5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?

b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?

Secretariat's Comments

Financing and GEBs: The project aims to tackle both POPs and Mercury issues, yet it only includes GEBs related to Mercury. This contradicts the proposed funding since it originates solely from the POPs fund. The funding source should be altered to Mercury, and GEBs for POPs should be incorporated, complete with a chemical list and corresponding tonnage. If this is not feasible, then funding from the POPs fund should be excluded.

Core Indicator 9.6 says that 500 tons of POPs/Mercury containing materials and products directly avoided, on the other hand, its explanation says, "The indicator (9) reflects quantity of 250 tons of PCBs and mercury?". Does this mean that PCB and Mercury will be reduced by 250 tons each? Also, please show how to calculate the Core Indicator.

ES, 10/28: The description on CIs has been clarified. At the time of CEO endorsement please estimate the amount of pure POPs and mercury in addition to the materials if possible.

Agency's Comments

Thank you.

The task team has clarified in the outline of the scope of the project and the GEBs targeted in the Project Concept Note, as well as the data sheet.

The project expects to reduce/ dispose/destroy/phase out/eliminate approximately 450 tons of waste containing PCBs, and approximately 50 tons of waste containing mercury.

This initial estimate for PCBs is based on the standard average cost of such interventions in the power sector. A cost analysis for handling, treating, and disposing of PCBs has not been carried out yet, as the task team is yet to obtain the data and identify priority sites with the Government.

For this estimate, other POPs and PCB cleanup projects have been considered. The following projects focused on the transport and disposal of POPs and treatment of PCBs have been used as benchmarks : (i) Moldova POPs Stockpiles Management and Destruction Project (P090037) where the cost per ton of PCBs eliminated was US\$4,200; (ii) China PCB Management and Disposal Demonstration Project (P082993) where each ton of eliminated PCB cost US\$4,100; (iii) Lebanon PCB Management in the Power Sector Project (P122540) where the average cleanup cost was US\$2,125 per ton; and (iv) Egypt's Sustainable Persistent Organic Pollutants Management Project (P116230) where the cost of OPs exported was US\$1,577 per ton on average, the average cost of OPs incinerated locally was US\$311 per ton and the cost of PCBs exported was US\$5,935 per ton including decontamination units, customs, PCB analysis and training. And finally, the Integrated Persistent Organic Pollutants (POPs) and Chemical Hotspots Management Project (P178935) where the average is approximately \$1,770 per ton for disposal and pilot treatment of PCBs. The task team has therefore conservatively assumed a cost of approx. \$4,000 for the planned PCBs-related interventions in this project, considering that remediation plans will also be developed for 3-4 priority sites. With these additional measures, the project as a whole is expected to significantly increase the capacity of the Government of Ukraine to address PCBs and is therefore expected to result in elimination of PCBs on a greater scale over time. The estimated direct reduction/ disposal of waste containing mercury (50 tons) is conservative. The project will explore options to address waste contaminated with mercury as part of the pilots supported by Component 3, and will also consider mercury in the remediation plans for priority sites.

Response to comments from 10/28:

Thank you. Noted

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

Secretariat's Comments NA

Agency's Comments

5.6 RISKS

a) Is there a well-articulated assessment of risk and identification of mitigation measures under each relevant risk category?

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 screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments

Robust Risk Mitigation for Conflict Zones: Although the proposal acknowledges the risks of operating in a conflict zone, it lacks specific mitigation strategies. It's essential to develop comprehensive plans to address security risks, potential project disruptions, and ensure the safety of personnel, and secure any hazardous waste addressed.

ES, 10/28: This will be addressed during PPG. Comment cleared.

Agency's Comments

Thank you.

These aspects will be reflected during project preparation in the Project Appraisal Document.

5.7 Qualitative assessment

a) Does the project intend to be well integrated, durable, and transformative?

b) Is there potential for innovation and scaling-up?

c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments

A clear strategy is needed to ensure that pilot projects and capacity-building initiatives are scalable and sustainable beyond the project's lifespan, including knowledge transfer, institutional strengthening, and securing long-term funding.

ES, 10/28: This will be addressed during PPG. Comment cleared.

Agency's Comments

Thank you.

Thank you, these aspects will be reflected during project preparation in the Project Appraisal Document.

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

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments Yes the project is in line with the CW strategy.

Agency's Comments Thank you.

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's Comments Yes, the project is in line with the Stockholm and Minamata Conventions.

Agency's Comments Thank you.

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's Comments This is not a BD project.

Agency's Comments

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

Private sector is missing.

ES, 10/28: This was added and will also be addressed during PPG. Comment cleared.

Agency's Comments Thank you, this part was added and will be further incorporated and reflected in the Project Appraisal Document.

7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments

Stakeholder consultation is missing.

It is noted that local communities and civil society organizations have not been consulted yet. In addition to efforts to ensure that the project will contribute in closing the gender gap in Ukraine, please ask agency to provide some further details on plans to consult and engage local communities and civil society organizations in project development.

ES, 10/28: This was added and will also be addressed during PPG. Comment cleared.

Agency's Comments Thank you, information on stakeholders added and will be further incorporated and reflected in the Project Appraisal Document.

8 Annexes

Annex A: Financing Tables

8.1 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's Comments Yes.

Agency's Comments Thank you.

Focal Area allocation?

Secretariat's Comments Yes, CW FA.

Agency's Comments Thank you.

LDCF under the principle of equitable access?

Secretariat's Comments NA

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments NA

Agency's Comments

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

Secretariat's Comments NA

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments NA

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments Yes.

Agency's Comments Thank you.

8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?

Secretariat's Comments

Please complete the 'investment mobilized' category for the World Bank in the cofinancing table.

ES, 10/28: This was added. Comment cleared.

Agency's Comments

Thank you.

Section completed in the co-financing tables

Annex B: Endorsements

8.4 Has the project been endorsed by the country's(ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments The OFP has changed since the project was signed, but it was the current OFP at the time of signature.

Agency's Comments Thank you.

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

Secretariat's Comments Yes.

Agency's Comments Thank you.

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

Secretariat's Comments Yes.

Agency's Comments Thank you.

8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's Comments NA

Agency's Comments
Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments Yes.

Agency's Comments Thank you.

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's Comments Yes.

Agency's Comments Thank you.

Annex E: Rio Markers

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

Secretariat's Comments NA

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments NA

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments NA

Agency's Comments

9 GEFSEC Decision

9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

Not at this time. Some issues remain.

ES, 10/28: Not at this time a few comments remain.

ES, 10/29: The project summary needs to be revised.

Agency's Comments

Thank you.

Comments addressed

Response to comments from 10/28:

Thank you. Comments addressed as requested.

9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval

Secretariat's Comments

Agency's Comments

Review Dates

	PIF Review	Agency Response
First Review	9/27/2024	
Additional Review (as necessary)	10/28/2024	
Additional Review (as necessary)	10/29/2024	
Additional Review (as necessary)		
Additional Review (as necessary)		