STAP SCREENING TEMPLATE

GEF ID	**11712**
Project title	**Hazardous Waste Management and Policy Development Project for Ukraine (HWM-PDU)**
Date of screen	**27 November 2024**
STAP Panel Member	**Miriam Diamond**
STAP Secretariat	**Sunday Leonard**

1. Summary of STAP's views of the project

The project aim is "building institutional capabilities, developing EU-aligned regulatory frameworks, and implementing pilot projects for the safe management and disposal of hazardous waste" with a focus on polychlorinated biphenyls (PCBs), mercury, and asbestos. A strong case is made for the importance of moving the project forward, given the magnitude of environmental contamination and the potential for exposure to people during the ongoing conflict. Also, Ukraine needs to comply with the Stockholm and Minamata Conventions, as the country has been granted EU candidate status.

The project is forward thinking by putting in place sound procedures and practices as the country looks towards post-war rebuilding. Justification for timely action comes from ~ 300 hazardous waste repositories that are not necessarily well secured and thus pose a risk of release. Further, the country contains many damaged PCB-contaminated transformers and capacitors within the power sector. Rebuilding of damaged and/or destroyed infrastructure could involve the handling of asbestos during demolition.

The project is designed to take a phased approach as a contingency for disruptions due to conflict. To overcome the loss of capacity within the relevant government agency, the proposal aims to engage with a national NGO (the responsibilities for the NGO need to be better explained). The proponents are also aiming to mobilize co-financing through World Bank and EU sources.

The STAP supports the need for the project and the project's design which follows from others involving hazardous waste management in support of the Stockholm and Minamata Conventions. The proponents are well aware of the risks involved in carrying out the project, however these are less than the risks to the environment and people of not carrying out the project. The encourage the proponent to apply best practice in implementing projects in conflicts and fragile situations, in which the World Bank has significant experience.

Note to STAP screeners: a summary of STAP's view of the project (not of the project itself), covering both strengths and weaknesses.

STAP's assessment*

- ☐ Concur - STAP acknowledges that the concept has scientific and technical merit
- Minor - STAP has identified some scientific and technical points to be addressed in project design
- ☐ Major - STAP has identified significant concerns to be addressed in project design

Please contact the STAP Secretariat if you would like to discuss.

2. Project rationale, and project description – are they sound?

See annex on STAP's screening guidelines.

1. **Systems thinking** is not included in the proposal, which is brief.

2. **Baseline, barriers and enablers.** While the baseline is described, barriers and enabling elements are implicitly discussed, e.g., barriers of the hollowing out of institutional capacity and risks posed by the conflict and

enabling elements of Ukraine being granted EU candidate status, which entails compliance with Stockholm and Minamata Conventions.

3. **Theory of Change (ToC)** includes 2 key assumptions and causal pathways linking activities, outputs and outcomes to the long term goal. The elements of the 2 causal pathways are sound (one for capacity building and the second for implementation of technical solutions and pilot projects). Missing from the ToC are barriers, enabling elements, and drivers. The proponent is encouraged to be more rigorous when developing the ToC further, especially with regard to assumptions underlying the causal pathways. The two assumptions currently are too broad and need to be more specific to the project context. For example, the assumptions need to consider the potential risks from conflicts affecting the delivery of the project and plan accordingly if the assumption does not hold.

4. **Project Components** appear to be sound and necessary. Some details are scant, such as those for project management and monitoring.

STAP recommends that the proponent apply best practices in implementing projects in conflicts and fragile situations, an area in which the World Bank has significant experience. The proponent should design and implement the project in line with the principles and practices noted in the World Bank Group Strategy for FCV. The World Bank report on how to improve results in situations of FCV and the STAP report on achieving durable outcomes in FCS are also helpful guides on project design considerations and implementation.

5. **Sectors and stakeholders** have been consulted, e.g., the Ministry of Environment. A Stakeholder Engagement Plan wil be developed during the project preparation phase. That plan intends to include local communities and civil society. The proposal includes gender-specific activities, e.g., developing a Gender Action Plan that involves empowering women in affected communities.

6. **Contributions to GEBs** are through indicator 9.6 (avoided POPs/mercury-containing materials) and 11 (people benefitting). The 500 ton estimate for indicator 9.6 is ~10% of the total PCB inventory of ~5,000 tons. Investments in capacity building will facilitate the environmentally sound management of the remaining PCB stocks. Better estimates under indicator 9.6 were constrained by the ongoing conflict. Mercury treatment was conservatively estimated at 50 tons. Estimates for asbestos treatment were not provided.

7. **Policy coherence** was alluded to under the analysis of risks related to political, governance, institutional and policy conditions. For example, the proponents wrote that implementing standardized procedures could be met with resistance. The proposal indicates moving forward with those components of the project that have strong political backing and stakeholder enagement.

8. **Alignment with current GEF investments** is described, notably coordination with the GEF-funded UNIDO project for Environmentally Sound Management of PCBs. The project is also coordinating with other funded, international initiatives, e.g., two projects funded by the Swedish government. The project aligns with the World Bank's strategy for Ukraine. The proposal discusses alignment with meeting climate targets but the explanation for this alignment was not given.

9. **Knowledgement management (KM)** is listed but not explained.

10. I**nnovation and scalability.** Scalability is implicitly considered through capacity building, investing in improving the inventory of e.g, PCBs, to guide prioritizing future projects, and investment in pilot management facilities and developing a testing facility.

11. **Monitoring and evaluation** is one of the 4 components of the project. Few details are provided.

12. The discussion of **Risks** was blunt by suggesting high risks associated with many factors from environmental and social, political, and governance to finance and capacity. These risks come from the ongoing conflict, macro-economic instability and the loss of capacity in many institutions. Measures are discussed to overcome these risks.

Note: provide a general appraisal, asking whether relevant screening guideline questions have been addressed adequately – not all the questions will be relevant to all proposals; no need to comment on every question, only those needing more attention, noting any done very well, but ensure that all are considered. Comments should be helpful, evaluative, and qualitative, rather than yes/no.

3. Specific points to be addressed, and suggestions

The proposal has high merit given the urgency of risks from unmanaged hazardous waste that has grown as a result of the conflict, the appropriate activities that have been proposed, and the alignment of the project with others seeking environmentally sound management of PCBs.

The proposal could be strengthened by adding more details where descriptions are minimal (e.g., monitoring and evaluation, knowledge management) and elaborating on the ToC which is missing barriers and enabling elements that are addressed through the causal pathways. The assumptions in the ToC also need to be more rigorous.

STAP encourage the proponent to review the points raised in Section 2 above and address them as the project is further developed.

Note: number key points clearly and provide useful information or suggestions, including key literature where relevant. Completed screens should be no more than two or three pages in length.

*categories under review, subject to future revision

ANNEX: STAP'S SCREENING GUIDELINES

Project rationale

1. How well does the proposal explain the problem and issues to be addressed in the context of the **system** within which the problem sits and its drivers (e.g. population growth, economic development, climate change, sociocultural and political factors, and technological changes), including how the various components of the system interact?

2. Does the project indicate how **uncertain futures** could unfold (e.g. using simple **narratives)**, based on an understanding of the trends and interactions between the key elements of the system and its drivers?

3. Does the project describe the **baseline** problem and how it may evolve in the future in the absence of the project; and then identify the outcomes that the project seeks to achieve, how these outcomes will change the baseline, and what the key **barriers** and **enablers** are to achieving those outcomes?

4. Are the project's **objectives** well formulated and justified in relation to this system context? Is there a convincing explanation as to **why this particular project** has been selected in preference to other options, in the light of how the future may unfold?

5. How well does the **theory of change** provide an "explicit account of how and why the proposed interventions would achieve their intended outcomes and goal, based on outlining a set of key causal pathways arising from the activities and outputs of the interventions and the assumptions underlying these causal connections".

    - Does the project logic show how the project would ensure that expected outcomes are **enduring** and resilient to possible future changes identified in question 2 above, and to the effects of any conflicting policies (see question 9 below).
    - Is the theory of change grounded on a solid scientific foundation, and is it aligned with current scientific knowledge?
    - Does it explicitly consider how any necessary **institutional and behavioral** changes are to be achieved?
    - Does the theory of change diagram convincingly show the overall project logic, including causal pathways and outcomes?

6. Are the project **components** (interventions and activities) identified in the theory of change each described in sufficient detail to discern the main thrust and basis (including scientific) of the proposed solutions, how they address the problem, their justification as a robust solution, and the critical assumptions and risks to achieving them?

7. How likely is the project to generate global environmental benefits which would not have accrued without the GEF project (**additionality**)?

8. Does the project convincingly identify the relevant **stakeholders**, and their anticipated roles and responsibilities? is there an adequate explanation of how stakeholders will contribute to the development and implementation of the project, and how they will benefit from the project to ensure enduring global environmental benefits, e.g. through co-benefits?

9. Does the description adequately explain:

    - how the project will build on prior investments and complement current investments, both GEF and non-GEF,
    - how the project incorporates **lessons learned** from previous projects in the country and region, and more widely from projects addressing similar issues elsewhere; and
    - how country policies that are contradictory to the intended outcomes of the project (identified in section C) will be addressed (**policy coherence**)?

10. How adequate is the project's approach to generating, managing and exchanging **knowledge**, and how will lessons learned be captured for adaptive management and for the benefit of future projects?

11. **Innovation and transformation:**
    - If the project is intended to be **innovative:** to what degree is it innovative, how will this ambition be achieved, how will barriers and enablers be addressed, and how might scaling be achieved?
    - If the project is intended to be **transformative:** how well do the project's objectives contribute to transformative change, and are they sufficient to contribute to enduring, transformational change at a sufficient scale to deliver a step improvement in one or more GEBs? Is the proposed logic to achieve the goal credible, addressing necessary changes in institutions, social or cultural norms? Are barriers and enablers to scaling be addressed? And how will enduring scaling be achieved?

12. Have **risks** to the project design and implementation been identified appropriately in the risk table in section B, and have suitable mitigation measures been incorporated? (NB: risks to the

durability of project outcomes from future changes in drivers should have been reflected in the theory of change and in project design, not in this table.)