

# Eliminating mercury skin lightening products

Review CEO Endorsement and Make a recommendation

## Basic project information

**GEF ID**

10810

**Countries**

Global (Gabon, Jamaica, Sri Lanka)

**Project Name**

Eliminating mercury skin lightening products

**Agencies**

UNEP

**Date received by PM**

4/9/2021

**Review completed by PM**

9/23/2021

**Program Manager**

Satoshi Yoshida

**Focal Area**

Chemicals and Waste

**Project Type**

MSP

# CEO Approval Request

## Part I ? Project Information

**1. Focal area elements. Is the project aligned with the relevant GEF focal area elements as indicated in Table A and as defined by the GEF 7 Programming Directions?**

Secretariat comment at CEO Endorsement Request

Yes.

Agency Response

**2. Project description summary. 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

July 19, 2021: Ratio of co-financing on PMC is at the same level to that of GEF-financing based on the available resources. Comment cleared.

Co-financing on PMC does not meet the proportionality compared with GEF financing on PMC. Please address.

Agency Response

UNEP Response July 2 2021

PMC proportionality has been addressed in all associated parts of the project document

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

Secretariat comment at CEO Endorsement Request

Agency Response

**4. Co-financing. Are the confirmed 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, consistent with the requirements of the Co-Financing Policy and Guidelines?**

## Secretariat comment at CEO Endorsement Request

Nov 16, 2021: Confirmation or updated letters are attached (except Sierra Club which was dropped).

Sep 28, 2021: The below are comments from fiduciary perspectives.

(i) A large number of sources of co-financing stipulate a timeline that is outdated. As an example, on the co-financing from ZMWG: They have pledged 150k starting in 2019 but it would be unrealistic to expect the same amount of co-financing giving that we are half way into what the timeline stipulated below. Same comment applies to a number of letters (like EEB below). In one case (BeautyWell), we have seen that an email was uploaded showing the interest of the NGO to continue their support, this procedure should be applied to all those letters outdated.

(ii) On the co-financing from Occidental College: the co-financing cannot be considered GRANT. The co-financing provided is a study. The way the numbers are presented in the table below is confusing, specifically where the 50k come from. Please verify and amend as appropriate.

(iii) On the co-financing from Label Beaute Noire: As per the letter shown below, it is not possible to understand what kind of co-financing this will be. Please ask for a letter that describes the co-financing, what it will entail and in which timeline it will be provided.

(iv) On the co-financing from Patheon of Women Who Inspire: the co-financing cannot be considered as a grant. Please correct for In-kind Recurrent Expenditures.

(v) On the co-financing from Sierra Club: same as above. Please change from Grant to in-kind recurrent expenditures.

(vi) On the co-financing from the Ministry of Health: Kindly note that given the information provided in the letter it is not possible to say what kind of co-financing it will be.

(vii) On the co-financing from the Ministry of Environment: As per the guideline stipulated below the co-financing letter should stipulate a time frame over which the co-financing will be provided.

July 19, 2021: Comments have been cleared from technical perspectives.

Please address the below points.

1. Some co-financing letters issued more than a year ago and described project periods (2020-2022 for Beautywell for example) do not match the project period on the portal (2021-2023). Please confirm validity of such letters and the co-financing commitments are still available for the new project period.

2. Co-financing from Label Beaut? Noire will support awareness-raising campaign amounted \$5 million as grant and as recurrent expenditures. Please provide more information on what kind of financial support it provides.

3. Please check if the types of co-financing (grant) on EEB and others are correct given the nature of such co-financing, and provide rationale in such cases.
4. Please provide a translation of the letters written in French.
5. The co-financing letter of Ministry of Environment, Sri Lanka says \$220,000 as in-kind will contribute to the project as staff management. Please clarify if this means staff-time instead of management of staff.

### Agency Response

#### UNEP Response July 2 2021

1. BeautyWell co-financing is reconfirmed (re-confirmation email attached as a document to the portal) for the new project period. All other letters that were issued after March 2020 remain valid.
2. Label Beaut? Noire?s contribution has been modified to in-kind as their network, experience and connections in Gabon and elsewhere in the world will contribute toward planned activities in all three components of the project. Their contribution is explained in more detail in the incremental cost reasoning section.
3. Co-financing from EEB and ZMWG have been modified to in-kind as their network, experience and fieldwork in the SLP area will contribute toward planned activities in all three components of the project.
4. Two letters from Gabon (Ministry of Environment and Ministry of Health) have been translated into English (attached as documents to the portal).
5. This is for staff time and has been highlighted on co-financing breakdown in Appendix 4.

#### UNEP Response October 2021

- (i) Reconfirmation emails and new letters from co-financing partners are attached as part of the re-submission
- (ii) A new letter received from Occidental College and attached as part of the re-submission, co-financing changed to in-kind and amount reduced to \$479,480
- (iii) An email confirming the timeline of co-financing is attached from Label Beaute Noire. A table confirming the description of their co-financing is included as part of the resubmission
- (iv) Co-financing changed to in-kind on CEO endorsement document.
- (v) Sierra Club did not confirm their co-financing for the project, so they have been removed from the list
- (vi) Email attached to the resubmission from the Ministry of Health Sri Lanka describing their co-financing and its validity
- (vii) New endorsement and co-financing letters attached to the resubmission from Ministry of Environment of Sri Lanka

**5. GEF resource availability. Is the proposed GEF financing in Table D (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):**

Secretariat comment at CEO Endorsement Request Yes, provided that comments on co-financing are clarified.

Agency Response

**STAR allocation?**

Secretariat comment at CEO Endorsement Request

Agency Response

**Focal Area allocation?**

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

**LDCF under the principle of equitable access?**

Secretariat comment at CEO Endorsement Request

Agency Response

**SCCF (Adaptation or Tech Transfer)?**

Secretariat comment at CEO Endorsement Request

Agency Response

**Focal Area Set Aside?**

Secretariat comment at CEO Endorsement Request

Agency Response

**Impact Program Incentive?**

Secretariat comment at CEO Endorsement Request

Agency Response

**6. Project Preparation Grant. If PPG is requested in Table E.1, has its advanced programming and utilized been accounted for in Annex C of the document?**

Secretariat comment at CEO Endorsement Request Yes. The project requests PPG reimbursement in line with the guidelines and within the maximum cap for this project.

Agency Response

**7. Non-Grant Instrument. If this an NGI, are the expected reflows indicated in Annex D?**

Secretariat comment at CEO Endorsement Request

Agency Response

**8. Core Indicators. Are the targeted core indicators in Table E calculated using the methodology in the prescribed guidelines? (GEF/C.54/Infxxx)**

Secretariat comment at CEO Endorsement Request Please see the comment on GEBs for indicator 6.

Agency Response

UNEP Response July 2 2021

Comment addressed in the portal and in the relevant GEB sections

**9. Project taxonomy. Is the project properly tagged with the appropriate keywords as in Table G?**

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

**Part II ? Project Justification**

**1. Project Description. Is there 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

July 19, 2021: Comment cleared.

On the country selection, please elaborate the rationale on the selection of Gabon from GEB perspectives since the estimated reduction of mercury in Gabon by this project is much smaller than the other two countries according to the GEB section (Gabon: 0.0043 tons per year; Jamaica: 0.4267 tons per year; Sri Lanka: 1.5456 tons per year).

Agency Response

UNEP Response July 2 2021

Rationale for country selection elaborated under Project Justification. Although the amount of SLP usage is not as great as compared to some other countries in Africa, Gabon has expressed strong interests in becoming a leader of SLP management of the African continent. Furthermore, BRI is currently working with Gabon on other projects and experiences have shown that stability and interests are strong in country.

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

Secretariat comment at CEO Endorsement Request

July 19, 2021: Comment cleared.

Please add as a potential collaboration GEF10218 AfDB ?AFLDC-2 Scaling-up Investment and Technology Transfer to Facilitate Capacity Strengthening and Technical Assistance for the Implementation of Stockholm and Minamata Conventions in African LDCs? that contains an output ?Increased engagement of civil society organisations, communities and consumers in designing, promoting and implementing ESM for chemicals and wastes? with a focus on skin lightening products.

Agency Response

UNEP Response July 2 2021

The AfDB project is now included under Baseline assessments.

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

Secretariat comment at CEO Endorsement Request

July 19, 2021: Comments cleared.

Please address the below points.

? TOC: We note the problem tree in the Prodoc to complement the ToC. To leverage this project to make other counties able to address SLPs issues, not only available resources but also knowledge management would be critical.

? Component 1: Please explain what strategies on post-project awareness raising activities would be put in place for each country.

? Component 3: Please elaborate Activity 3.1.1.1 ? create a global repository of mercury SLP legislation including the expected activities and the goal. Please elaborate Activity 3.1.1.4 including on what outcomes are envisaged at this stage.

? Component 4: The GEF document referred is not updated (GEF/C.59/Inf.03 Guidelines on the Project and Program Cycle Policy is the latest, updated on July 20, 2020). Financial audit is under PMCs and can be excluded from this section.

Agency Response

UNEP Response July 2 2021

1. TOC: Problem tree and objective tree both modified to include knowledge management.

2. An explanation is added in the alternative scenario under Component 1 (page 21).
3. Further explanation for the global repository of mercury SLP legislation are added in the alternative scenario under Component 3 (page 23). The target for Activity 3.1.1.4 is to reach agreements with at least two internet marketers to stop sale/promotion of SLPs on their respective sites.
4. Audit is excluded from component 4.

**4. Project Description. Is there an elaboration on how the project is aligned with focal area/impact program strategies?**

Secretariat comment at CEO Endorsement Request As the project aims to reduce the production of mercury-containing SLPs, the alignment with CW1-1 is clear.

Agency Response

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

Secretariat comment at CEO Endorsement Request Contributions from co-financing are clear. Please further clarify the incremental reasoning (project activities) from the baseline and the co-financing.

Agency Response

UNEP Response July 2 2021

Co-financing and incremental cost reasoning section modified for more clarity.

**6. Project Description. Is there a better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?**

Secretariat comment at CEO Endorsement Request

July 19, 2021: Comment cleared.

We note the uncertainty of the estimation with limited information on the concentration and products sold in underground markets. On the other hand, while this section describes the estimated mercury reduction through the project is approximately 3.95 tons per year and the project duration is three years, indicator 6 is still 3.95 tons. Please clarify.

Agency Response

UNEP Response July 2 2021

As the proposed project's interventions evolve mainly around awareness raising, mercury reduction will unfortunately not start in year 1 and 2 of the project. The potential mercury reduction rate is anticipated to gradually increase in the last year (3rd

year) or after project ends. In addition, global environmental benefits calculations are mainly based on mercury avoidance, rather than mercury reduction. Please note that the global environmental benefits have been recalculated (please refer to the global environment benefits section and appendix 12 for further information).

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

Secretariat comment at CEO Endorsement Request

July 19, 2021: Comment cleared.

In terms of post project finance, please elaborate how the project will help each country to secure such finance. Please also include knowledge management for sustainability and scaling-up.

Agency Response

UNEP Response July 2 2021

The project was not designed as a financing project, but mainly an awareness raising project. Therefore, the project can advise but is not required to obtain or secure funds for post project activities in each target country. In terms of knowledge management, sustainability and scale-up, the project will aim to disseminate materials produced as broadly as possible. The Global Mercury Partnership will remain as an information hub after the project ends. In addition, strategies for post project awareness raising in countries will be developed during the project. The strategies and activities for post-project continuity, including a sustainability plan for the ways in which the countries will continue to use the materials they have produced, will be defined by and decided upon by each country with assistance from the project.

More emphasis has been placed on the involvement of Green Growth Knowledge Platform (GGKP), which is an existing platform that is utilized by a number of projects including GEF ISLANDS Programme. This would ensure sustainability and scaling-up.

**8. 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

July 19, 2021: Comment cleared.

Please add the maps of the three project countries.

## Agency Response

UNEP Response July 2 2021

Maps of the three countries have been inserted.

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

Secretariat comment at CEO Endorsement Request

## Agency Response

**10. 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

Nov 16, 2021: Further information is provided on the preparation phase and the implementation phase.

Sep 28, 2021: The below is a comment from policy perspective.

The project states that it did not have sufficient resources to carry out a stakeholder engagement exercise during project preparation. While, there might be justifications for a limited stakeholder consultation exercise, the project should and must at least provide some information on who they consulted and what process they used to develop the project.

July 19, 2021: Comment cleared.

Largely yes. Please consider including potential manufacturing companies in each country to the extent possible. Also, please include other private sector stakeholders such as internet marketers.

## Agency Response

UNEP Response July 2 2021

The Zero Mercury Working Group (ZMWG) has been engaging the private sector to stop the promotion of SLPs. However, without a thorough investigation in each target country, it is difficult to determine the manufacturing companies that are involved in the production of SLPs. It is possible that the national Ministries have some preliminary data and information, but these were not provided during the project preparation phase. However, identification of SLPs with mercury content more than 1 ppm will be addressed in component 2 of the project when different SLPs products are analyzed. In regards to internet marketers, there are still plenty of online platforms that are selling SLPs. ZMWG is currently finalizing a report with details on these platforms. The

anticipated release date for this report is before the second part of COP4, during the first quarter of 2022.

#### UNEP Response October 2021

The Stakeholder Engagement section has been modified to include more information related to stakeholder consultations during the project preparation phase as well as the implementation phase.

**11. 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

Nov 16, 2021: Further information is provided on the gender analysis and draft gender action plan. Comment cleared.

Sep 28, 2021: While there might be justifications for a limited gender analysis during project preparation, the project should at least be able to provide some additional efforts to further analyze and identify gender dimensions as relevant to the project objective and components as part of the effort to further substantiate the project gender action plan.

July 19, 2020: While understanding that limited budget of PPG did not allow the project to produce a comprehensive gender action plan, it is at least necessary at this stage that a preliminary ideas of the plan (and how the project will make such a plan) including possible gender-responsive measures and indicators, based on the gender analysis, should be described in this section.

The gender action plan is not elaborated in line with the Gender Equality Guidelines (Gender considerations during CEO Endorsement preparation). Please address while separating a gender analysis and a gender action plan.

[https://www.thegef.org/sites/default/files/documents/Gender\\_Equality\\_Guidelines.pdf](https://www.thegef.org/sites/default/files/documents/Gender_Equality_Guidelines.pdf)

#### Agency Response

##### UNEP Response July 2 2021

The gender equality section of the proposal has been modified in line with the Gender Equality Guidelines of the GEF. A gender analysis has been provided at the project design stage, however, only through the gender expert to be recruited by the co-financing of WHO, a gender action plan will be developed during the inception phase of the project.

##### UNEP Response Sep 7 2021

A conceptual framework to develop a gender action plan during the project inception phase has been included under the gender section.

#### UNEP Response October 2021

The Gender Mainstreaming section of the CEO Endorsement document has been modified to include additional efforts to further analyze and identify gender dimensions to further substantiate the gender action plan.

**12. 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

July 19, 2021: Comment cleared, provided more information will be gathered at a later stage.

On the description of ?There will be follow-up with online retailers, such as Amazon and eBay,? there should be more engagements with internet marketers under component 2.

Agency Response

#### UNEP Response July 2 2021

ZMWG is actively engaged with the private sector, including internet marketers. When the proposed project is approved and in its inception phase (anticipated to be in last quarter of 2021 to first quarter of 2022), a complete report from ZMWG with more detailed information will be available.

**13. Risk. 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.

Agency Response

**14. 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

July 19, 2021: Comment cleared.

Yes. Please include the GEF project 10218 in this section as well.

Agency Response

**UNEP Response July 2 2021**

GEF project 10218 has been included in the coordination section.

**15. Consistency with national priorities. Has the project described the consistency 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

**16. 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

July 19, 2021: Comments cleared.

1. How the project will learn from lessons learned of relevant projects and experiences including those in other countries should be elaborated.
2. Please elaborate how the knowledge management deliverables and approaches will enhance the successful implementation of the project as well as the sustainability and scaling up after the project.

Agency Response

**UNEP Response July 2 2021**

1. The knowledge management section has been modified to include the contribution of Global Mercury Partnership which is to ensure that lessons learned from relevant projects and experiences from other countries are exchanged with the project and vice versa.
2. Contribution of the knowledge management and global campaign to be led by the Global Mercury Partnership and WHO, respectively, will enhance the successful implementation of the project as well as the sustainability and scaling up after the project. This has been elaborated under component 3 and also under knowledge management section of the proposal.

**17. 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

**18. 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

July 19, 2021: Comment cleared.

Health benefits of SLPs users should be elaborated in this section.

Agency Response

UNEP Response July 2 2021

Health benefits of SLPs users have been inserted in the benefits section.

**19. Annexes:**

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

Secretariat comment at CEO Endorsement Request

Nov 22, 2021: The revised budget table with project managers are charged to PMCs only. Comments cleared.

Nov 16, 2021: The budget table is not readable. Please revise for further review.

Sep 28, 2021: The below are comments from fiduciary and policy perspectives.

- (i) Both WHO and BRI are charging some admin support costs as shown below. Instead of generic activities provided by the executing agency (i. e. procurement, financial management, administrative), we need to see positions properly budgeted (i. e. procurement specialist, project coordinator, etc.). The reason is to be aligned with Guidelines so whenever a position is charged to both PMC and project's components TORs specifying the contribution to the components are required
- (ii) WHO is an UN Agency. After screening the document, there is no additional UN Agency having a potential role in the project different than UNEP (who is the Implementing Agency). Hence, in absence of clear indication of the participation of another UN Agency in the project, this budget line (\$198,000) must be removed.
- (iii) Office supplies and sundry costs should be charged to PMC but not to project component ? also GEF funds cannot be used for banking costs (please remove them):

July 19, 2021: Appendix 7 does not provide sufficient and clear ToR on BRI project manager/technical expert who plays the dual role on PMCs and Components as per the GEF guidelines as below. WHO Project coordinator/international health specialist / Administrator would be the same case. Please address.

*If project staff are charged to both PMC and project components (i.e. not only to PMC), clear Terms of Reference describing unique outputs linked to the respective components are required at the time of CEO Endorsement/Approval, for review by the Secretariat. Project staff refers to the following: i) personnel of the Executing Entity carrying out long-lasting tasks funded with GEF resources;*

On the budget table, please address the below:

1. 1101 ? 1104 some are only allocated to components while others are allocated to both components and PMCs while their roles are unclear. Please clarify and modify.
2. Please clarify why 1201 National Managers are allocated on component 1 and 3 as opposed to PMCs. If they are just consultants, please change the names.
3. Please clarify why 1301 WHO HR, procurement, financial management is split into component 1 and PMCs as well as the nature of the cost.
4. Miscellaneous cost 5301 should be charged to PMCs if the cost is used for project management, while such cost can be charged on each component if used for each component.
5. Component 2 is not ?baseline assessment? according to Table B.

## Agency Response

### UNEP Response July 2 2021

1. Budget table have been revised (lines 1101-1104). PMC has been redistributed among the experts. Roles have been clearly indicated between BRI and WHO and matched with Appendix 7.
2. 1201 has been changed to national experts.
3. This is related to the issuance and management of contracts for services and are allocated to the components where these services are required.
4. Miscellaneous costs will be used in each component; PMC communication is covered by WHO co-financing, therefore no budget is planned for this.
5. Wording for component 2 has been changed on the budget table.

### UNEP Response Sep 7 2021

TORs for 4 key personnel (1 for WHO and 3 for BRI) under the project have been attached to the resubmission. Tasks related to project components and project management are now clearly delineated in Appendix 4 - Budget Breakdown.

### UNEP Response October 2021

- (i) Administrative Officer positions created for WHO and BRI. Costs associated with these positions are charged against PMC, not project components.
- (ii) Subcontract to an UN Agency has been removed from the budget and reallocated to individual consultancies and subcontract to manage communication campaign.
- (iii) Banking costs have been removed from budget; office supplies and sundry costs are now charged against PMC, not project components

UNEP Response 18 November 2021

The budget table has been revised and re-submitted in the Portal.

**20. 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 Yes.

Agency Response

**Project Results Framework**

Secretariat comment at CEO Endorsement Request

July 19, 2021: Comments cleared.

Please address the below points.

1. Please clarify the relationship between indicator 6 (3.95 tons) and the end of project target (20% reduction of mercury SLPs (total quantity) in each target country).
2. Targets under component 1 use legislations while indicators use policies, strategies, and regulations. Please clarify which will be indicators.
3. While some targets have at least 30% of women participation, the fact that women tend to use SLPs more than men as described in the document. Please consider increasing the ratio or explain the rationale.
4. While Output 3.1.1 has a target 'At least two internet marketers reached,' it is encouraged to have actual action of such marketers.

Agency Response

UNEP Response July 2 2021

1. The global environment benefits of the project have been recalculated. Based on the population and percentages of SLP usage by men and women in all three target countries, the estimated mercury reduction through the project is approximately 2.9 tons per year (Gabon: 0.0043 tons per year; Jamaica: 1.395 tons per year; Sri Lanka: 1.5456 tons per year). This includes a replication factor of 2 through national and global awareness activities. In terms of percentages, the reduction goal (through removed and avoided use of SLPs with Hg) is approximately 50-55% for each country. While the uncertainty within each country of how the percentage of SLPs with Hg vary by access category, the project's approaches will be proportionally successful within each country. The interventions will be able to end most if not all commercial imports of SLPs with mercury, significantly reduce local production of SLPs with mercury, especially in the legal and more open markets, and reduce the purchase of SLPs with mercury through the internet. The black market sales of SLPs with mercury in Jamaica (where it is being produced) and in Sri Lanka

(where is it imported illegally) are considered the greatest reduction and avoidance challenges for the project.

2. Targets have been modified on the logical framework.
3. Targets for women participation will vary based on activity type. Only meetings under output 1.1.3 that directly relate to the public/SLP users have a target of 40% women participation, the remaining training and meetings that do not directly involve potential users of SLPs (such as training for custom officials and manufacturers/traders) kept the 30% target for women participation.
4. Target for Output 3.1.1 modified in the logical framework.

**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 Yes.

Agency Response

**Project maps and coordinates**

Secretariat comment at CEO Endorsement Request Please see the above relevant box.

Agency Response

**Part III ? Country and Agency Endorsements**

**1. Country endorsements. Has the project/program been endorsed by the country?s GEF Operational Focal Point and has the name and position been checked against the GEF data base?**

Secretariat comment at CEO Endorsement Request

Nov 16, 2021: Comment cleared.

Sep 28, 2021: The below is a comment from fiduciary perspective.

The project is implemented by UNEP and executed by WHO and Biodiversity Research Institute (BRI) on behalf of three countries, Gabon, Jamaica, and Sri Lanka. The LOE from Sri Lanka doesn't mention this arrangement while LOEs from Gabon and Jamaica do mention this. Please address.

Yes.

Agency Response

UNEP Response October 2021

New endorsement letter from Sri Lanka received and it is part of the resubmission.

**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**

**1. RECOMMENDATION.**

**Is CEO endorsement/approval recommended?**

Secretariat comment at CEO Endorsement Request

Nov 22, 2021: Comments cleared.

Nov 16, 2021: The budget table needs to be revised for further review.

Sep 28, 2021: Please address comments above on LoE, budget, co-financing, and stakeholders and gender plans from fiduciary and policy perspectives.

July 19, 2021: Please address the remaining comments.

Not at this stage. Please address the comments above.

**Review Dates**

	<b>1SMSP CEO Approval</b>	<b>Response to Secretariat comments</b>
<b>First Review</b>		<b>7/2/2021</b>
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		
<b>Additional Review (as necessary)</b>		

**1SMSP CEO  
Approval**

**Response to Secretariat  
comments**

**Additional Review (as  
necessary)**

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**