

Integrated Management and Environmentally Sound Disposal of POPs Pesticides and Mercury in Healthcare and Agricultural Sectors in Sri Lanka

Basic Information

GEF ID

10868

Countries

Sri Lanka

Project Title

Integrated Management and Environmentally Sound Disposal of POPs Pesticides and Mercury in Healthcare and Agricultural Sectors in Sri Lanka

GEF Agency(ies)

UNDP

Agency ID

UNDP: 6677

GEF Focal Area(s)

Chemicals and Waste

Program Manager

Yuki Shiga

PIF

Part I – Project Informatic

Focal area elements

1. Is the project/program aligned with the relevant GEF focal area elements in Table A, as defined by the GEF 7 Programming Directions?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Cleared. Earlier comment(s) are appropriately addressed.

9.20.2021:

There is no proportionality in the co-financing contribution to PMC. If the GEF contribution is kept at 5.0%, for a co-financing of \$39,710,000 the expected contribution to PMC must be around \$1,985,500 instead of \$1,150,000 (which is 2.9%). As the costs associated with the project management have to be covered by the GEF portion and the co-financing portion allocated to the PMC, the GEF contribution and the co-financing contribution must be proportional, which means that the GEF contribution to PMC might be decreased and the co-financing contribution to PMC might be increased to reach a similar level. Please amend either by increasing the co-financing portion and/or by reducing the GEF portion. A more definitive estimation of PMC will be presented and adjusted at CEO Endorsement stage.

Agency Response PMC co-finance was revised as per Guidelines to US \$1,985,500 (5% of co-financing).

Indicative project/program description summary

2. Are the components in Table B and as described in the PIF sound, appropriate, and sufficiently clear to achieve the project/program objectives and the core indicators?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Cleared. Earlier comment(s) are appropriately addressed.

9.20.2021:

Some Components/Outcomes/Outputs in Table B seem be different from what is indicated in Section II-(E). For example, Outputs 3.1.5 and 3.2.4. Please update these for consistency.

Recommended action: Please address the above point(s).

Agency Response PIF was duly revised in Part II (E) (pages 19-20 of Word-version PIF and the GEF Portal submission).

Co-financing

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, with a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized?

Secretariat Comment at PIF/Work Program Inclusion

10.29.2021:

Cleared. Earlier comment(s) are appropriately addressed.

10.20.2021:

Please provide further explanation on UNDP's grant contribution. Particularly on how this grant is considered/identified as recurrent expenditures. In general, grants should be categorized as Investment Mobilized.

9.20.2021:

"In-kind" is typically 'recurrent expenditure'. Further elaboration as to why the in-kind contribution from the local authorities is considered

- in kind is typically recurrent expenditure. Further elaboration as to why the in-kind contribution from the local authorities is considered as investment mobilized and not recurrent expenditure would be helpful in understanding this.
- A lot of co-financing has been categorized as "OTHER". Please request the agency to look at the guidelines, annex 14, page 98: https://www.thegef.org/sites/default/files/council-meeting-documents/EN_GEF_C.59_Inf.03_Guidelines%20on%20the%20Project%20and%20Program%20Cycle%20Policy.pdf Please confirm the type of co-financing for all co-financiers.
- It seems awkward that a Bank (the Central Bank of Sri Lanka) could be categorized as "beneficiary" – please revise or provide further explanation on this.

Recommended action: Please address the above point(s).

Agency Response

(a) Co-financing contribution from Local Authority would include investments related to land, machinery (vehicles transporting waste, backhoes) etc. as well as the costs related to typical "recurrent expenditures" such as staff salaries. As such we revised and broke down the co-finance in:

- (i) *Investment Mobilized (USD 100,000)*
- (ii) *Recurrent expenditure (USD 75,000).*

(b) The following co-finance sources were corrected to "in kind":

- (iii) *Department of Agriculture (US\$ 1,235,000)*
- (iv) *Ministry of Health (US\$ 2,000,000)*
- (v) *Ceylon Waste Ltd (US\$ 9,100,000)*
- (vi) *Asia Recycling Ltd. (US\$ 3,000,000)*
- (vii) *Central Bank of Sri Lanka (US\$ 600,000)*
- (viii) *Local Authorities (US\$ 100,000 and US\$ 75,000)*

(c) As per above, we further clarify the details of co-finance sources, accordingly:

- (ix) *Department of Chemical Management, Ministry of Environment (US \$ 500,000): refers to **public investment – investment mobilized***
- (x) *Department of Customs (US \$ 150,000): refers to **public investment – investment mobilized***
- (xi) *Ceylon Waste Ltd (US\$ 2,000,000): refers to **"Loan – Investment Mobilized"***

(d) Central Bank of Sri Lanka categories were corrected to "Recipient Country Government" given its legal/Institutional Status.

10.26.2021:

The referred grant classification was corrected to "Investment Mobilized", as per Guidelines.

GEF Resource Availability

4. 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 PIF/Work Program Inclusion Yes.

Agency Response

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion Yes.

Agency Response

The LDCF under the principle of equitable access?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

Project Preparation Grant

5. Is PPG requested in Table E within the allowable cap? Has an exception (e.g. for regional projects) been sufficiently substantiated? (not applicable to PFD)

Secretariat Comment at PIF/Work Program Inclusion Yes. PPG has been requested and is within the allowable cap.

Agency Response

Core indicators

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

Secretariat Comment at PIF/Work Program Inclusion Yes.

Agency Response

Project/Program taxonomy

7. Is the project/program properly tagged with the appropriate keywords as requested in Table G?

Secretariat Comment at PIF/Work Program Inclusion Yes.

Agency Response

Part II – Project Justification

1. Has the project/program described the global environmental/adaptation problems, including the root causes and barriers that need to be addressed?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

2. Is the baseline scenario or any associated baseline projects appropriately described?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Cleared. Earlier comment(s) are appropriately addressed.

9.20.2021:

Please further consider following project, which this project could build on, learn from and/or coordinate with, as a baseline:
GEFID5314 Environmentally Sound Management and Disposal of PCBs Wastes and PCB Contaminated Equipment in Sri Lanka.

Agency Response

We appreciate the Secretariat's important suggestion. This is noted and was included in the PIF sections:

- Part II (E): Activities under Output 1.1.1 (page 16 of Word-version PIF);
 - Part II (E): Activities under Output 4.1.4 (Pages 20-21 of Word-version PIF)
- Part II (I): additional reference under para 53 (page 24 of Word-version PIF)

3. Does the proposed alternative scenario describe the expected outcomes and components of the project/program?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Cleared. Earlier comment(s) are appropriately addressed.

9.20.2021:

The details of the below can be elaborated further in the PPG phase; however, even an initial conceptual blueprint could help better understand the proposal.

1. Green Finance Framework and innovative green procurement mechanism:

Please further elaborate on what this is and how this works. PIF states: 'A Green Finance Framework (GFF) will be developed for the promotion mercury phase-out in healthcare sector'; however, it is not clear how GFF will work in achieving this objective. In addition, how green procurement mechanism is innovative should be also elaborated further for clarification.

2. Pilots and assistance:

The project seems to conduct number of pilots and provide assistance to different facilities, such as those described in Outputs 2.1.2, 3.1.1, 3.1.5 3.2.1 and 3.2.2. Please further elaborate on how the project will ensure that the most appropriate facilities /sites are selected.

Recommended action: Please address the above point(s).

Agency Response

Green Finance Framework (GFF) is further detailed under Output 1.2.2 as below *(please note the additions to original PIF marked in red, to facilitate tracking)*:

Output 1.2.2. Finance framework for the procurement of mercury-free medical devices and HCWM disposal equipment developed.

- A Green Finance Framework (GFF) will be developed for the promotion mercury phase-out in healthcare sector. The project will build from positive experiences of different projects (such as GEF IDs 10349, 4611 and 1802) as well as international best practices in the area. The GFF will also help to address other challenges in the deployment of non-incineration HCWM equipment following the CBA and business models to be developed under the component 3. Public and Private Partnership (PPP) schemes will also be promoted as many government and private healthcare will need upfront investment to transform their current inappropriate HCWM practices.
- The project will set out the basis for identification, selection, verification and reporting of the green healthcare projects that are eligible for financing to be available through banks (backed by Green Savings Bonds, etc.) such as the Central Bank of Sri Lanka (CBSL) and private banks.
- The Guidelines for green finance will serve as regulatory tools for sustainable finance in Sri Lanka based on the directives of the CBSL's Road Map for Sustainable Finance (2019). GFF is expected to evolve to channel financial flows towards promoting major goals of low carbon economic growth, pollution reduction, GHG emissions, waste reduction and Natural Resource Management; while the private banks (such as Pan Asia Bank and, Seylan Bank) will strengthen their linkages with international partners to benefit from green bonds and to offer green finance options to their clients.
- Additionally, the Sustainable Banking Initiative of Sri Lanka, consisting of 18 private banks (since 2015), is also expected to be incorporated in the GFF framework, and its abilities with green bond platforms will also be investigated during the PPG stage. Beneficiaries of the GFF will be mostly healthcare facilities, private sector engaged in waste management, suppliers HCWM equipment, machinery, local authorities, and suppliers of alternative (green) equipment, tools and services.

Green procurement mechanism is further detailed under Output 1.2.1, as below *(please note the additions to original PIF marked in red, to facilitate tracking)*:

Output 1.2.1. Green procurement standards established, including proposals on bulk procurement and coordinated strategies for replacement of mercury-based medical devices including dental amalgam.

- Although Draft Sustainable Production and Consumption Policy in Sri Lanka recommends having a National Green Procurement Policy before 2020, this mechanism hasn't been developed yet. Hence, green procurement standards and guidelines proposed to be developed for healthcare sector procurement will contribute towards the initiation of a national green procurement mechanism.
- The project will support the development of proper quality and technical standards to harmonize the mercury-free alternative products. This will provide the platform for the healthcare sector to close the loops, organize a more systematic and coordinated replacement through technical standards, propose a bulk procurement methodology, and accelerate the replacement activities initiated under the baseline project of the MoH.
- The project will demonstrate the application of green procurement standards to help health sector to consider how to take social and environmental impacts into account during procurement (incrementally to quality, price and related maximum economic benefits considerations), and with the help of PPPs, it will deploy the green procurement guidelines and encourage local supplies to identify sources of eco-friendly products and services and prioritize these for local use.

The Pilots and technical assistance is further detailed under Output 3.2.1, as follows *(please note the additions to original PIF marked in red, to facilitate tracking)*:

Output 3.2.1. Public-Private Partnership (PPP) for a Centralized Waste Management System that can incorporate the de-contamination healthcare waste facility is piloted.

A Centralized Clinical Waste Treatment Facility (CCWTF), using non-incineration technology, and attached to a landfill, will be established, with support from Ministry of Health and to be operated in a PPP model- The CCWTF will receive and treat contaminated HCW from small and micro health care facilities that are not able to operate, in a sustainable manner, "in house" HCWM equipment. Lessons learned from the baseline CCWTF (incineration facility) will be used to improve the non-incineration CCWTF system.

- In addition, the pilot Centralized Clinical Waste Management Facility will be selected under supervision of the Ministry of Provincial Councils and Local Government, Central Environmental Authority and Ministry of Health, taking into consideration the following factors:
 - (i) Existence of functioning landfill, or availability of land and financial resources to establish a landfill;
 - (ii) Proximity to the pilot servicing healthcare facilities; and
 - (iii) The Company must not have any legal impediment that could prevent it to engage in public-private partnership schemes or take part of any Legal Agreements under the Project Framework.

The activities under Output 3.2.3 were further reviewed, as below detailing the selection of the pilots that are linked to the Outputs 2.1.2, 3.1.1 and 3.1.5 *(please note the additions to original PIF marked in red, to facilitate tracking)*:

- The project will develop Comprehensive Business Plans and gender-sensitive HCWM plans reflecting the experiences of technical assistance and pilot/demonstration activities with the installation of specific low-cost autoclave equipment and infrastructure for the small/medium scale operation. The five (5) pilot sites under Output 3.2.3 are integrated with the activities of the Outputs 2.1.2, 3.1.1 and 3.1.5, and will be selected under supervision of the Ministry of Health (MoH). The location/region will be defined during the PPG phase, but these will be aligned with the areas where investment from MoH has been allocated in National Budget. The specific selection criterion will be defined in PPG phase, however general criterion would include:
 - (i) Having a significant number of small private dispensaries and related services that generate hazardous waste;
 - (ii) Be a medium-to-small sized facility;
 - (iii) No waste treatment facility;
 - (iv) Proven capacity to provide required co-finance to the project activities; and (i) Legal Entity, Company of healthcare Unit must be owned by public or private sector juristic person to be able to formally engage with the Project. entities:

Finally, UNDP clarifies that the Output 3.2.2 will provide technical assistance to all 20 healthcare facilities that own Metamizers in Sri Lanka, hence no selection process will be carried out as all these facilities are eligible for the TA.

4. Is the project/program aligned with focal area and/or Impact Program strategies?

Secretariat Comment at PIF/Work Program Inclusion

Yes. The proposal is aligned with CW-1-1 (Industrial Chemicals Program) and CW-1-2 (Agricultural Chemicals Program).

Agency Response

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

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

6. Are the project's/program's indicative targeted contributions to global environmental benefits (measured through core indicators) reasonable and achievable? Or for adaptation benefits?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

7. Is there potential for innovation, sustainability and scaling up in this project?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Cleared. Earlier comment(s) are appropriately addressed.

9.20.2021:

Further clarification is needed on innovative green procurement mechanism (please see Section II-3).

Agency Response

Please note, in addition to the clarifications provided under Question 3, the following clarifications were included under Part II (J) Sustainability and Potential to Scale Up, para 60, as follows:

60 .The project sustainability and scale up are expected to be achieved with the development of the long-term green finance mechanisms and green procurement standards that will support local facilities in Sri Lanka to expedite and scale up the replacement of mercury-containing medical devices and products in line with the baseline national Policies set by the MoH. In addition, the green finance will enlarge the scope of the replacement activities and cover the deployment of non-incineration disposal units upon the technical and economical demonstration to be implemented in Component 3. The green procurement mechanism is also expected to unlock **the initiation of a national green procurement mechanism covering other aspects of public procurement by connecting stakeholders through PPPs and encourage local supplies to identify sources of eco-friendly products and services and prioritize these for long term local use.**

Project/Program Map and Coordinates

Is there a preliminary geo-reference to the project's/program's intended location?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Stakeholders

Does the PIF/PFD include indicative information on Stakeholders engagement to date? If not, is the justification provided appropriate? Does the PIF/PFD include information about the proposed means of future engagement?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Gender Equality and Women's Empowerment

Is the articulation of gender context and indicative information on the importance and need to promote gender equality and the empowerment of women, adequate?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Cleared. Earlier comment(s) are appropriately addressed.

9.20.2021:

This project's statements with regard to gender equality and women's empowerment are generic and do not elaborate on any indicative information on gender related to the specific project context or activities. In addition, the project indicates that it expects to include any gender-responsive measures to address gender gaps or promote gender equality and women empowerment and has ticked that it expects to (i) closing gender gaps in access to and control over natural resources; (ii) improving women's participation and decision-making; and (iii) generating socio-economic benefits or services for women. Agency should provide some indicative on gender dimensions related to the

project context and components as well as some preliminary information on any measures proposed by the project. Based on this additional information, the agency should review/revise the gender tags.

Agency Response

Please note the confirmed Gender Tags are the ones selected below and do not include “closing gender gaps (...)”:

closing gender gaps in access to and control over natural resources;

improving women’s participation and decision-making; and/or

generating socio-economic benefits or services for women.

We had further reviewed the Part II, Section 3 of the PIF to further clarify the issues related to gender in the specific project context/or activities in Sri Lanka, as requested by the Secretariat: *(please note the additions to original PIF marked in red, to facilitate tracking):*

71. Globally, it is estimated that 70% of all the healthcare workers are women^[1]. Women have high representation in the healthcare sector in Sri Lanka too, engaging as nurses, attendants, cleaning staff, etc. As such, women also generally face increased risks of exposure which may be associated with greater socioeconomic consequences too. Hospital staff with higher exposure to risks are attendants who work on wards and inside the medical establishment and the sanitary workers who collect waste from points of generation. While distinguishing between these two categories is not always easy in smaller facilities, most of them are invariably women (~ 80-90%)^[2]. Therefore, women will greatly benefit from the project in terms of improved health and safety of working conditions.

In addition, the participation of women in the waste management sector is also expected to be relevant, particularly in the areas of recycling. Women is also present in higher posts at public and private sector and will play a critical role in the institutional and regulatory related activities under the Component 1. However, it is also acknowledging that several barriers to female production⁷¹. workers, female medical staff and female residents exist and may affect their engagement in the project. Women workers’ engagement in trainings on use of mercury-free thermometers and mercury-free sphygmomanometers etc.

72. In Sri Lanka, women make up higher proportion of employees in public and private health sector too with 62% of all health and social workers, and therefore proper prioritization and targeted activities in management strategies, awareness creation, skills development and participatory decision making actions are required. Female staff in these areas usually lack recognition, adequate training, technical skills, resources and options required to adhere to standards. Therefore interventions promoted by the project should aim to improve the baseline gender status and minimize risks for female, even more important in the current context of COVID-19 pandemic.

73. The project will also promote recycling of different types of HCW streams management through segregation (i.e. Paper, plastics, glass etc.), considering The female workers generally perform the sorting, which is a skillful task requiring high

the sorting, which is a skillful task requiring high attentiveness but with lower physical requirements, local women entrepreneurs will be encouraged to participate in recycling opportunities, this focused activities related to awareness, training and skills enhancement opportunities will be required. Public awareness programmes on POPs and mercury toxicity and reducing related risks will also include/target women, especially as there are large number of working women in industry/small industry, both as employees and self-employed, who unknowingly expose themselves to risks.

74. Therefore, a specific Gender Action Plan (GAP) will be prepared during the PPG phase to further collect gender sensitive data at the targeted sectors, review baseline in relation to Gender, and develop gender sensitive strategies to be incorporated within the revised national guidelines, regulatory frameworks and during the implementation of the demonstration/pilot activities. The proposed gender action plan will recognize women's contribution in health sector and HCWM and is anticipated to include (but not limited to) aspects of:

- (a) Strengthening women's active participation in teams and opportunity for and recognition of leading specific functions or responsibilities for specific operations in HCWM value chains/Hg phaseout;
- b) Planning/ producing knowledge products and planning/delivering training programmes;
- c) Training/awareness programmes to include specific concerns of women and/or targeted training and knowledge products for women using women friendly approaches;
- d) Facilitating discussions on specific risks for women and their families and promoting risk reduction measures.

[1] M. Boniol Et. Al, 2019, Gender equity in the health workforce: Analysis of 104 countries; WHO available at: <https://apps.who.int/iris/bitstream/handle/10665/311314/WHO-HIS-HWF-Gender-WP1-2019.1-eng.pdf?ua=1>

[2] Ministry of Health UNDP, 2021, Rapid Assessment of HCWM in Sri Lanka; (from the detailed casestudies of selected hospitals in the East developed in 2020 as an input to the, assessment)

Private Sector Engagement

Is the case made for private sector engagement consistent with the proposed approach?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Risks to Achieving Project Objectives

Does the project/program consider potential major risks, including the consequences of climate change, that might prevent the project objectives from being achieved or may be resulting from project/program implementation, and propose measures that address these risks to be further developed during the project design?

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response

Coordination

Is the institutional arrangement for project/program coordination including management, monitoring and evaluation outlined?
Is there a description of possible coordination with relevant GEF-financed projects/programs and other bilateral/multilateral initiatives in the project/program area?

Secretariat Comment at PIF/Work Program Inclusion

10.29.2021:

Cleared. Earlier comment(s) are appropriately addressed.

10.20.2021:

The newly attached document mentions that "Project Monitoring Units are not required for the monitoring of projects". However, UNDP argued that the reason for UNDP to execute the project is "a recent issuance of government Circular (see Annex 04) that ministries are not

argued that the reason for UNDP to execute the project is “a recent issuance of government Circular (see Annex 04) that ministries are not allowed to establish a Project Management Units (PMU) for implementation of development projects” – this is not what the document

presents. That said, even if this would have been the case, it is contradictory with the content of the checklist that stipulates “CO’s limited execution support ... will be carried out by the PMU” . This is also different from what is indicated in the the previous checklist which indicated that UNDP would also implement the PPG.

9.20.2021:

- While there is a letter of support for UNDP to carry out some executing activities based on “a recent issuance of government Circular (see Annex 04) that ministries are not allowed to establish a Project Management Units (PMU) for implementation of development projects”, such circular was not found in Portal.
- The checklist indicates that “The PPG will be implemented by UNDP under Direct Implementation Modalities therefore an LOA is not required in PIF stage.” However, Section 6 indicates that this project will be implemented under Assisted NIM. Please provide clarification or amend as appropriate (e.g., remove this intend from the document and the checklist).

Agency Response

- (1) We had uploaded the mentioned Circular in the GEF Portal

- (2) We confirm that the Full Size Project will be implemented as Country Office Support to NIM (COS to NIM), and the arrangements of implementation were included in the GEF Portal and in the PIF Format (Part II, Section 6, Pages 32-34).

We hope the clarifications (2) above helped to clear, checklist was corrected in the mentioned section accordingly.

We further confirm and clarify that no LOA is required at PIF Stage.

10.26.2021: We clarify:

(a) The framework of the Circular 05-2020-20200903, Articles 4b and 4c stipulates the General Provisions for new PMUs under new Projects.

(i) Specifically, Projects with International Funding (4c) should be (re)design to incorporate these conditions related to the PMU restrictions, which was duly reflected in the Arrangements of this PIF.

(b) UNDP also sought additional clarifications from the Ministry of the Planning, during the PIF development and for the preparation of the Checklist, minding that the General Instructions of Article 4d (translated to English) could leave space for other interpretations, as pointed out by the Secretariat:

(i) The Ministry of Planning confirmed this also encompasses the creation of new PMUs for new projects with foreign funding that would be administered entirely by the IPs through cash transfers (the directive of 4d means that if IP structure exists – i.e. is fully budgeted and staffed - then new PMUs would not be needed for new Projects):

- (ii) As informed in the Checklist and PIF, the IP does not have additional dedicated staff to comply with the Article 4(a) and 4(d) for absorbing PMU responsibilities. Thus managing the additional workload, funding and contracts to execute the project would not be possible using base staff of the IP.
- (iii) And as confirmed by the Ministry of Planning, this project then does not qualify for the setting up new PMUs under government structure, as per the Intra-Ministerial Circular number MNPEA/02/2019 of 10.01.2019.
- (c) UNDP further clarifies that the Circular would not reach the PMU concept being proposed under the Project through “COS to NIM” modality, as the correspondent funding won’t be transferred to the IP (Government) Budget, therefore the PMU structure designed for the Project would not be subject of articles 4(a), 4(b), 4(c) nor (4d).
- (d) Hence, based on the above, the IP requested UNDP to provide “CO support to NIM” as the IP won’t be able to establish the PMU within its organizational structure and manage its budget directly, (won’t being able receive cash transfers to carry on the full set of administrative and operational procedures for the project using its own structures - as would be the case for a “Full NIM PMU”).
- (e) We further clarify that the Instructions mentioned would then not contradict the justifications provided for the “COS to NIM” modality, in which UNDP would provide limited execution support to the Ministry. Finally, we also clarify that the above would be in line with the Checklist, as informed in its pages 2 and 3, where UNDP’s limited assistance (through Operations Team) would focus on:
 - (i) UNDP to facilitate establishment of PMU structure and recruit PMU staff (managing contracts), while PMU staff reports directly to the Project Board (chaired by the Government’s IP).
 - (ii) UNDP to facilitate the recruitment of the third parties “Responsible Parties” (using UNDP’s operational Contracts and Letters of Agreement). The RPs will execute the Project components and activities, delivering Outputs directly to the PMU, which, by its turn, reports to the Project Board.

Consistency with National Priorities

Has the project/program cited alignment with any of the recipient country’s national strategies and plans or reports and assessments under relevant conventions?

Secretariat Comment at PIF/Work Program Inclusion

10.20.2021:

Further explanation provided.

9.20.2021:

Yes. However, it would be useful to understand any plan for NIP update as the proposal states elsewhere that NIP is out-of-date.

Agency Response

The project will support the Government of Sri Lanka to update the specific inventories of the NIP, under the Output 1.1.1, by surveying and assessing the value chains for PFOS (and its Salts), PFOAS and PBDEs, since the data compiled in the NIP is already 6 years old and may not present a comprehensive picture of situation pertaining imports and use of these POPs in Sri Lanka.

Knowledge Management

Is the proposed “knowledge management (KM) approach” in line with GEF requirements to foster learning and sharing from relevant projects/programs, initiatives and evaluations; and contribute to the project’s/program’s overall impact and sustainability?

Secretariat Comment at PIF/Work Program Inclusion

- Please provide information on ‘plans to learn from relevant projects’. In addition, the PIF states: ‘...knowledge and experience will be gathered, documented, managed and disseminated through the following activities...’. Please provide details of these activities as these are not clear.
- please provide further clarity on how knowledge and learning will contribute to overall project impact and sustainability.

Recommended action: Please address the above point(s).

Agency Response

We had further reviewed the Part II, Section 8 of the PIF to further clarify the issues requested by the Secretariat, as below: *(please note the additions to original PIF marked in red, to facilitate tracking):*

89. The Component 4 of this project proposal will be dedicated to “Knowledge Management and Monitoring & Evaluation” (KM & M&E). As part of Component 4, the project will Implement:

- a Stakeholder Engagement Plan to raise awareness to project beneficiaries;
- a Gender Mainstreaming Action Plan to promote gender equality and to include all displaced women’s reemployment policies in the project phase-out guidelines; and
- a Project Communication Strategy making use of publications, promotional materials, lessons learned reports, among else to accomplish knowledge sharing.

90. Knowledge and experience will be gathered, documented, managed and disseminated through the following activities which will capture lessons-learnt and experiences gained, and will publish them, lessons-learnt reports and promotional materials that will be used in

training, seminars and workshops to facilitate the national scale up and to achieve sound management of chemicals.

91. The project will collect experiences and lessons learned from relevant GEF projects implemented (e.g. GEF project IDs 10349, 4611 and 1802) as well as international best practices in the area to compound relevant KM Plans and improve the replication of successful experiences". Specifically, the project will identify potentially replicable or adaptable strategies, approaches, and methodologies that has worked well internationally which would include BAT/BEP, business models, standards and guidelines knowledge management products. The expected activities include:

- i. Review similar projects and collect experiences learned and supporting documents;
- ii. Review meeting reports, collect primary data from the pilot sites, building links with research community and encourage analysis of information generated by HCWM pilots and Mercury phase out activities;
- iii. Produce publications (and create collaborations with Academia for opportunities for students' research);
 - i. Carry out relevant documentation, develop case studies, create guidelines and instructions within new or revised SOPs of individual hospitals and Ministry of Health.
 - ii. Disseminate experiences using digital platforms, training programmes and other materials.
 - iii. Engage with media outlets, create and promote the project's social media.

89. Knowledge and learning experiences generated from the Pilot Projects and the green procurement and green finance mechanisms will primarily be tailored for stakeholders use in forms of training, diverse range of technical and knowledge products, webinars/workshops, content for digital platforms and social media, as well as awareness materials. The Project will such strategies to target wider healthcare stakeholders in the country to sustain and replicate the pilot experiences.

The training and capacity building programmes will be conducted with options to connect remotely providing opportunities for target groups beyond the pilot locations to participate, and as such the actions will also cover both public and private sector across Sri Lanka. Ministry of Health will use these products proactively to target subnational Governments and medical establishments (including private ones), through relevant institutional mechanisms. Finally, the Project will also engage with Academia and research community, CSO and media outlets to wider knowledge sharing and look into practical ways to scale up impacts.

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 PIF/Work Program Inclusion

Yes.

Agency Response

Part III – 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 PIF/Work Program Inclusion

Yes.

Agency Response

Termsheet, reflow table and agency capacity in NGI Projects

Does the project provide sufficient detail in Annex A (indicative termsheet) 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 in Annex B to assess the project capacity of generating reflows? If not, please provide comments. After reading the questionnaire in Annex C, is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat Comment at PIF/Work Program Inclusion

Agency Response

EFSEC DECISION

RECOMMENDATION

Is the PIF/PFD recommended for technical clearance? Is the PPG (if requested) being recommended for clearance?

Secretariat Comment at PIF/Work Program Inclusion

10.29.2021:

This PIF is recommended for technical clearance.

10.20.2021 /09.20.2021:

Not yet. Please refer to the review items and resubmit for consideration (please highlight the update).

ADDITIONAL COMMENTS

Additional recommendations to be considered by Agency at the time of CEO endorsement/approval.

Secretariat Comment at PIF/Work Program Inclusion

Review Dates

	PIF Review	Agency Response
First Review	9/27/2021	
Additional Review (as necessary)	10/20/2021	
Additional Review (as necessary)	10/29/2021	
Additional Review (as necessary)		
Additional Review (as necessary)		

PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval