

Integrated Persistent Organic Pollutants (POPs) Management Project

Basic Information

GEF ID

10972

Countries

Iraq

Project Title

Integrated Persistent Organic Pollutants (POPs) Management Project

GEF Agency(ies)

World Bank

Agency ID

World Bank: P178935

GEF Focal Area(s)

Chemicals and Waste

Program Manager

Evelyn Swain

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

Yes, the project is aligned with the GEF-7 CW strategy.

Agency Response Thank you

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 Yes, table B is and the project objectives are clear.

Agency Response Thank you

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 Yes, co-financing is adequate.

Agency Response

Thank you.

The World Bank has a pipeline of relevant projects that this project will be exploring during preparation for co-financing. The pipeline of projects for Iraq was defined in the Country partnership framework, these investments include components that are relevant to the proposed GEF project and will be confirmed during preparation stage. The following are the potential pipeline projects, that will be explored during preparation for co-financing.

1. Support to Management of Environmental Hotspots (P173049) – US\$5 million (with possible additional financing)
2. Iraq Southern Region Electricity Network Strengthening Project (P175879) – US\$59 million (for PCBs and related interventions)

Additional project currently in early development stage is also being explored - Iraq Resilient and Inclusive Municipal Services and Local Development Program - will have uPoPs and related interventions.

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, table D is clear.

Agency Response Thank you

The STAR allocation?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

The focal area allocation?

Secretariat Comment at PIF/Work Program Inclusion Yes.

Agency Response Thank you

The LDCF under the principle of equitable access?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

The SCCF (Adaptation or Technology Transfer)?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

Focal area set-aside?

Secretariat Comment at PIF/Work Program Inclusion NA

Agency Response

Impact Program Incentive?

Secretariat Comment at PIF/Work Program Inclusion NA

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

The PPG needs to be corrected. The program of funds are coming from ODS. This should be switched to POPs.

ES, 4/25/22: PPG has been corrected. Comment cleared.

Agency Response Thank you

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

Please add indicator 9.6 if possible, the quantity of POPs containing material.

ES, 4/25/22:

9.1 should be the amount of pure chemical including PCB and lindane where as 9.6 should be the amount of the materials or equipment containing these chemicals (for example the tons of PCB transformers that include PCB oil). Can you please clarify that this is how 9.1 and 9.6 are calculated?

ES, 4/29/22: Only Lindane is showing in 9.1. Please include how much pure PCBs and how much Lindane will be addressed through the project in 9.1.

ES, 4/29/22: 9.1 has been updated. Comment cleared.

Agency Response

Thank you.

The project target is to dispose a total of 4000 tons of POPs:

For 9.1 – The amount of pure chemical including DDT (300 tons) & Lindane (700 tons)

For 9.6 – The amount of the materials or equipment containing these chemicals (including PCB transformer oil) – 3000 tons

For core indicator 11: Based on the initial list of PCB and OP storage sites it is estimated that there are about 51 sites across 10 governorates of Iraq. The direct beneficiaries have been estimated based on the population living in the immediate vicinity of these sites. The estimate will be further refined during the preparation phase and more accurate estimates of direct beneficiaries will be provided in the CEO endorsement package

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

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, this is clear in the project document.

Agency Response: Thank you.

Agency Response Thank you

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

Secretariat Comment at PIF/Work Program Inclusion

Yes, this is clear in the project document.

Agency Response Thank you

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

Secretariat Comment at PIF/Work Program Inclusion

Yes, this is clear in the project document.

Agency Response Thank you

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

Secretariat Comment at PIF/Work Program Inclusion

Yes.

Agency Response Thank you

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 Thank you

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 the core indicators are reasonable.

Agency Response Thank you

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

Secretariat Comment at PIF/Work Program Inclusion

This is not included in the project document.

ES, 4/25/22: This has been updated. Comment cleared.

Agency Response

Thank you

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

Geo-reference is not included.

ES, 4/25/22: A map has been added. Comment cleared.

Agency Response

Thank you

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, stakeholder engagement is included.

Agency Response

Thank you

As part of NIP preparation, MoE together with Ministries of Agriculture and Electricity held stakeholder consultations with various public and private stakeholders including CSOs. In addition, World Bank and MOE teams held joint consultations with civil society and other stakeholders (i) on May24, 2021, as part of the ongoing 'Support to Environmental Hotspots Program' and (ii) broader consultations on environment and climate challenges in Iraq on December 13, 2021 and December 20, 2021. Further local level consultations were also carried out by MoE and Bank consultants with communities in March/ April 2022, as part of filed inventory of environmental hotspots in Iraq. All these consultations/ discussions/ interactions with civil societies and local communities brought out the need for addressing the issues of POPs and also other hazardous substance in Iraq and provided critical inputs for the identification of project components and their design. Building on these consultations, more structured/ focused consultations will be carried out during the preparation phase of the project, in the prioritization of POPs storages sites, identification of treatment/ disposal strategies and health and safety measures. A specific and detailed stakeholder engagement plan will also be prepared by the Appraisal phase of the project in line with the requirements of World Bank's 'Environmental and Social Framework (ESF) for review and clearance by the World Bank.

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

Yes, gender context is included.

Agency Response

Thank you.

As indicated in para 46 of the concept note, The project will pay special attention to the aspects of gender inclusion in all facets of project preparation, implementation, monitoring and evaluating its impacts on women beneficiaries. The project will also make a specific effort in including women in the process of identifying locations of project intervention and also selection of appropriate technologies. The project will also ensure to include women in the monitoring and feedback systems of the project. As evident from number of evaluations, pollution management interventions (similar to that of the

systems of the project. As evident from number of evaluations, pollution management interventions (similar to that of the project) will significantly reduce environmental and health risks to neighboring communities, including women. This reduction of risks, will facilitate improved productivity and employment opportunities to women and subsequent socio-economic benefits. In addition, as part of the corporate commitments of The World Bank, the project will be reviewed for Gender Equity/ inclusion during the preparation phase appropriate measures and actions will be integrated into the project design and implementation. These measures/ actions will be clearly spelt in the 'Project Appraisal Document' that will be submitted for GEF CEO endorsement and World Bank management approval.

Private Sector Engagement

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

Secretariat Comment at PIF/Work Program Inclusion

Private sector engagement is included.

Agency Response Thank you

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

Please add the risks associated with the ongoing COVID-19 pandemic and the climate change risks.

ES. 4/25/22: This has been added. Comment cleared.

Agency Response

Thank you

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

Ministry of Environment (MoE) will execute the project in close collaboration with the Ministry of Agriculture (MoA) and Ministry of Electricity (MoElc).

Agency Response

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

Yes, this project is consistent with the Stockholm Convention NIP.

Agency Response Thank you

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

Yes.

Agency Response Thank you

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 Thank you

art 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

Thank you.

Letter of endorsement from the OFP has been updated.

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

NA

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

Not at this time. Some issues remain.

ES, 4/25/22: Not at this time. Core indicator 9.1 and 9.6 need to be checked.

ES, 4/28/22: The amount of PCB is missing from core indicator 9.1 only Lindane is shown. Please update this.

ES, 4/29/22: PPO has the following comments:

1. Co-financing: Please remove 64M 'unidentified' Investment Mobilized entry. At CEO endorsement request submission, report the amount as 'confirmed' co-financing and submit co-financing letters from the source of each grant.
2. Core Indicators: Please provide explanation on the number of direct beneficiaries from this project as reported under core indicator 11. Please explain how this 19 million is calculated which seems too high.
3. Agency fee and Submission Date are missed in the Project Information section – please ask the Agency to amend:
4. Letter of Endorsement shows two different amounts as highlighted below: in the text one finds \$17,441,707 while in the table one finds \$15,000,000. Please ask the Agency to get a new LoE or an email from the OFP clarifying the figures (in which case, the email has to be appended to the document's tab)
5. Stakeholder Engagement: It is well noted that project includes information on planned Stakeholder Identification and Engagement process. The project, however, does not any information on the consultation carried out during project design or the means and processes that different stakeholders have participated in consultations during the project identification phase. Please ask Agency to provide additional details on consultation carried out during project design, including with civil society actors.
6. Gender Equality: The project does not elaborate on any considerations on gender dimensions relevant to the project. It states that it expects to contribute to improving women's participation and decision-making and generating socio-economic benefits or services for women. Apart from a very brief mentioning that the project expects to engage women during the public consultations of preparing environmental and social instruments for the project and ensure inclusion of women in the

public consultations or preparing environmental and social instruments for the project and ensure inclusion of women in the both the project Steering Committee and POPs National Coordination Committee, it does not outline any information on the

importance of doing this or plans to carry out assessments in project development to ensure women’s meaningful participation and contribution. It is also unclear how this project will generate socio-economic benefits or services for women. Please ask agency to provide additional background information and elaboration of it plans in project development.

ES, 5/10/22: PPO comments have been addressed. PIF is recommended for technical clearance.

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	4/14/2022	
Additional Review (as necessary)	4/25/2022	
Additional Review (as necessary)	5/4/2022	
Additional Review (as necessary)	5/10/2022	
Additional Review (as necessary)		

PIF Recommendation to CEO

Brief reasoning for recommendations to CEO for PIF Approval

This project will improve management of Obsolete Pesticides, Persistent Organic Pollutants (POPs) and Polychlorinated Biphenyls (PCBs) in Iraq through policy, regulatory and institutional actions and safe disposal of targeted stock piles of pesticides, POPs and PCBs. The project will also updated National Implementation Plan (NIP) for POPs, and completed and system for tracking and management of pesticides. A national inventory of transformers will be completed and system for tracking and management of PCBs will be set up. POPs and POPs waste will be destroyed, disposed, or contained in an environmentally sound manner. The project will result in global environmental benefits, including 1,000 tons of PCBs and lindane disposed and 3,000 tons of POPs containing materials avoided.