

Promoting environmentally sound management of perfluoroalkyl and polyfluoroalkyl substances-related firefighting foam in Saint Lucia ? St. Lucia PFAS Foams Project

Review CEO Approval and Make a recommendation

Basic project information

GEF ID

12250

Countries

St. Lucia

Project Name

Promoting environmentally sound management of perfluoroalkyl and polyfluoroalkyl substances-related firefighting foam in Saint Lucia ? St. Lucia PFAS Foams Project

Agencies

UNIDO

Date received by PM

12/19/2025

Review completed by PM**Program Manager**

Jewel Batchasingh

Focal Area

Chemicals and Waste

Project Type

CEO Approval Request

Part I - General Project Information

1. a) Is the Project Information table correctly filled, including specifying adequate executing partners?

Secretariat comment at CEO Endorsement Request
BCRC SCRC Caribbean listed as Executing Agency.

Please note the fonts vary throughout the document.

Agency Response Fonts have been standardized across all sections.

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

Secretariat comment at CEO Endorsement Request
The following Rio Markers are detailed:

Rio Markers			
Climate Change Mitigation	Climate Change Adaptation	Biodiversity	Land Degradation
No Contribution 0	No Contribution 0	No Contribution 0	Significant Objective 1

Agency Response

2. Project Summary.

a) Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?

b) Does the summary capture the essence of the project, is well written and is it within the max. of 250 words?

Secretariat comment at CEO Endorsement Request Yes. 23,000 Litres of PFAS foams to be disposed.

Agency Response

3. Project Description Overview

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

b) Are the components, outcomes, and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?

c) Are gender dimensions, knowledge management, and M&E included within the project components and appropriately funded?

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

e) Is the PMC equal to or below 10%? If above 10%, is the justification acceptable?

Secretariat comment at CEO Endorsement Request

This paragraph does not read well where it is and does not flow with the rest of the document.
Please consider placing elsewhere:

Gender studies in Saint Lucia[1] reveal a complex interplay of high female labor force participation and education alongside persistent gender gaps in income and other areas. While women are more educated and participate in the workforce at higher rates than in many other countries, including a lower gender gap in participation compared to the Organization for Economic Co-operation and Development (OECD) average, they still face significant challenges in the labor market and experience disproportionate effects from childcare responsibilities.

PMC is well below 10%

Agency Response

The paragraph has been relocated to the section 'PFAS contamination and gender perspective in Saint Lucia' as part of the project rationale.

4. Project Outline

A. Project Rationale

- a) Is the current situation (including global environmental problems, key drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective and adequately addressed by the project design?**
- b) Have the role of stakeholders, incl. the private sector and local actors in the system been described and how they will contribute to GEBs and/or adaptation benefits and other project outcomes? Is the private sector seen mainly as a stakeholder or as financier?**
- c) If this is an NGI project, is there a description of how the project and its financial structure are addressing financial barriers?**

Secretariat comment at CEO Endorsement Request

The current situation is very well detailed.

The role of the stakeholders such as the fire service personnel was well detailed. However the inclusion of the general public and residents of the targeted sites, should be better elaborated in the document as it is done well in the GAP.

Component 4 - Where will the knowledge hub be housed? Is there a link with the database?

Agency Response

1) In response to the GEF's request on general public and residents of the targeted sites, we have included a summary in Project description: Stakeholders Engagement: 'Local communities and civil society' section, based on the GAP detail, the text corresponds to:

'The project considers a broad cross-section of the general public, residents, and civil society across Saint Lucia, particularly those living within a 5 km radius of the 12 targeted facilities, including urban, peri-urban, and rural communities. These populations include households dependent on tourism, services, agriculture, and fisheries, with varying levels of infrastructure and vulnerability.

Civil society actors such as environmental NGOs, community organizations, fisherfolk groups, and local councils play a key role in awareness-raising, monitoring, and feedback mechanisms, especially in coastal and high-risk areas. The project also actively engages vulnerable groups, including women, youth, and female-headed households, recognizing that while women often have higher educational attainment, they face greater economic vulnerability and indirect exposure risks. In addition, the initiative involves institutional stakeholders (e.g., fire service, health authorities) and promotes inclusive participation through transparent communication, grievance mechanisms,

and capacity-building activities to ensure community health, environmental protection, and long-term sustainability.?

2) Regarding the Knowledge Hub, Initial discussions began with the Fire Department for information related to firefighting systems and foams, and with the BCRC Caribbean and the Department of Sustainable Development for POPs related data and information.

5 B. Project Description

5.1 a) Is there a concise theory of change (narrative and an optional schematic) that describes the project logic, including how the project design elements are contributing to the objective, the identified causal pathways, the thrust and basis (including scientific) of the proposed solutions, how they provide a robust solution and listing the key assumptions underlying these?

b) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?

c) Are the project components (interventions and activities) described and proposed solutions and critical assumptions and risks are properly justified? Is there an indication of why the project approach has been selected over other potential options?

d) Incremental/additional cost reasoning: Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12? Has the baseline scenario and/or associated baseline projects been described? Is the project incremental reasoning provisioned (including the role of the GEF)? Are the global environmental benefits and/or adaptation benefits identified?

e) Other Benefits: Are the socioeconomic benefits resulting from the project at the national and local levels sufficiently described?

f) Is the financing presented in the annexed financing table adequate and demonstrate a cost-effective approach to meet the project objectives? Are items charged to the PMC reasonable according to the GEF guidelines?

g) How does the project design ensure resilience to future changes in the drivers and adaptive management needs and options (as applicable for this MSP)?

h) Are the relevant stakeholders (including women, private sector, CSO, e.g.) and their roles adequately described within the components?

i) Gender: Does the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities and have these been taken up in component description/s?

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

k) Policy Coherence: Have any policies, regulations or subsidies been identified that could counteract the intended project outcomes and how will that be addressed?

l) Transformation and/or innovation: Is the project going to be transformative or innovative? Does it explain scaling up opportunities?

Secretariat comment at CEO Endorsement Request

Has consideration been given to inclusion of academia in the project? This is specifically in relation to the sampling as it is noted that they will be invited to sit on the PSC as required.

The GAP refers heavily to the inclusion and information sharing with the communities. This should be strongly reflected in the project document given the nature of the project and the nearby communities.

There was no reference to legal assessments conducted under GEF 5558 or GEF ISLANDS. There exists an import negative list law in SLU and has this been considered as an option? This could potentially impact the budget.

Agency Response

1) The project states that academia will contribute to inclusivity, transparency, and long-term capacity building (in the section on stakeholder engagement, Academic and training institutions). Both the SEP and the CEO Endorsement document identify Academic and training institutions as formal stakeholders. Their role will be to integrate PFAS modules into firefighter and environmental management curricula and to support capacity building and knowledge transfer to future professionals, as already stated in the document. Thus, their function will be to ensure knowledge is passed to future professionals and to contribute to long-term capacity building and the sustainability of project outcomes (see component 3 details). However, the involvement of academia in sampling has not been envisioned, since regular academic staff for field activities like sampling are not experts or high-level personnel; in general, they are interns or junior professionals. Therefore, in this case, the project envisages samples being collected by firefighters, guided by an international expert in foam management, capacity building on that has been prioritized for firefighters. Once the lessons learned are ready, academia will also be invited to training sessions and to contribute to publications under component 3, but no direct services or related sampling have been envisioned at the initial stages of the project.

2) Also, regarding information sharing, the following text has been included in the project rationale in the system challenges, barriers, and risks subsection: 'In addition to environmental risks, the project operates in close proximity to multiple communities located within a defined radius of the twelve facilities with high fire risk, including fire stations, airports, and petroleum storage sites. The Gender Analysis confirms that populations living within these areas are directly connected to surrounding ecosystems. These communities, ranging from rural agricultural settlements to urban and peri-urban areas, are therefore integral to the project context, both as potential receptors of environmental impacts and as key stakeholders in risk awareness and environmental management of risk prevention. Information on risks, fire prevention, mitigation measures, and project interventions needs to be and will be effectively communicated to nearby populations. For more details on the communities' identification, please refer to the GAP assessment.'

3) Regarding the reference to legal assessments conducted under GEF 5558 or GEF ISLANDS, and the existence of an import negative list law in SLU considered as an option. The Sustainable Development and Environment department confirmed that Saint Lucia does not have a formal import negative list, that is, a single unified list of banned or restricted goods. However, import controls are exercised through a combination of legal and administrative instruments, including:

- Prohibited Imports under the Customs (Control and Management) Act, which establish absolute bans on specific goods

- Restricted Imports under the same Act, which require permits or approvals for importation

- Import Licensing Regime under the External Trade Act, administered by the Ministry of Commerce, which applies to a defined list of goods requiring licenses prior to import

These mechanisms collectively function as the country's import control system, although they are not consolidated into a single negative list framework, and there is no comprehensive monitoring. In addition, Saint Lucia currently has no specific law regulating PFAS or firefighting foams. While existing legislation, such as the Pesticides and Toxic Chemicals Control Act, Waste Management Act, and various Customs and Trade Acts, touches on related areas, none explicitly address PFAS or the use of firefighting foams. Moreover, these frameworks lack comprehensive lifecycle oversight, meaning they do not adequately regulate the import, use, and disposal stages. As a result, the current regulatory approach is indirect, fragmented, and insufficient.

This structure also highlights a key gap relevant to chemicals management. Substances such as PFAS in firefighting foams can fall between existing control mechanisms, as they are not explicitly listed as prohibited, are not consistently captured under restricted or licensing schedules, and there is no overarching mechanism to address such emerging chemicals. This underscores the importance of strengthening import controls through updated legislation and/or expanded schedules.

We did review the legal assessments carried out under the GEF 5558 (2018) and ISLANDS 10279 (2025) projects and a draft legal assessment report (2025) developed under a project funded by UNEP's Programme. Based on those, we considered the required budget, and just for clarification, we have added the following text in the project document, under component 1:

?Saint Lucia should establish a comprehensive, enforceable regulatory framework to eliminate PFAS in firefighting foams by enacting explicit legislation banning their import, use, and sale, a recommendation grounded in the Legal Assessment Report (2025), which identifies that existing legislation is fragmented, outdated, and lacks coverage of industrial chemicals and hazardous waste lifecycle management. The need to strengthen hazardous waste regulation, covering storage, transport, treatment, and disposal, also derives from this same report, which highlights gaps in hazardous waste definitions, standards, and Basel Convention alignment. Complementing this, the National Country Summary (2025) supports recommendations for improved import/export controls, monitoring systems, and enforcement capacity, as it documents limitations in border control practices, lack of routine chemical screening, insufficient laboratory capacity, and weak inter-agency coordination. The recommendation to develop an integrated, lifecycle-based chemicals management system, including inventories, standards, and institutional coordination, draws from both the Legal Assessment Report, which calls for a comprehensive national chemicals strategy and stronger governance mechanisms, and the GEF 5558 ICM Evaluation Framework, which emphasizes the importance of harmonizing legislation with an Integrated Chemicals Management Model Act and strengthening policy development, regulatory review, and implementation capacity. Together, these conditions justify the development of enhanced compliance mechanisms to address the systemic deficiencies that currently limit effective chemical and waste management in Saint Lucia.?

Therefore, the budget allocated for the legal framework enhancement has taken into account these initial legal findings and the corresponding budget for pending national activities related to the regulatory framework.

5.2 Institutional Arrangements and Coordination with Ongoing Initiatives and Project.

- a) Are the institutional arrangements, including potential executing partners, outlined on regional, national/local levels and a rationale provided? Has an organogram and/or funds flow diagram been included?**
- b) Comment on proposed agency execution support (if agency expects to request exception). Is GEF in support of the request?**
- c) Is there a description of coordination and cooperation with ongoing GEF and non-GEF financed projects/programs (such as government and/or other bilateral/multilateral supported initiatives in the project area, e.g.).**

Secretariat comment at CEO Endorsement Request

ADDITIONAL COMMENT MAY 19 2026:

UNIDO responded to the Project Steering Committee comment with the following:

"For this project, UNIDO will act as the Implementing Agency and is not expected to assume an execution role at this stage. Accordingly, any related voting rights in the Project Steering Committee (PSC) may be exercised as they pertain to UNIDO's implementation oversight function. Following finalization of the PSC composition, any actual or potential conflicts of interest will need to be disclosed where unavoidable, with affected PSC members having to recuse themselves from related decisions, in line with internationally recognized professional standards and good governance principles."

The request is not related with the expectation for the GEF Agency to assume an execution role. Pursuant to the letter sent by the CEO to all GEF Executive Coordinators on March 20th 2026, we request Agency to explicitly state that if participating in the PSC, the GEF Implementing Agency will not exercise voting rights. This declaration does not preclude their participation in the PSC,

neither the implementation oversight function that the GEF Implementing Agency has because all decisions coming from the PSC will ultimately be subject to the no-objection decision that the Agency must provide for each and every project activity and expenditure. Conversely, if the GEF implementing Agency exercises voting rights in the PSC, they can influence a decision that later will be subject to their no-objection, which is or can be perceived as a conflict of interest.

The organogram is clear.

1. It is noted that the Agency ?will also participate in the Project Steering Committee (PSC) and may request additional meetings outside the scheduled times if necessary.? Please note that it is considered good practice for the Agency to participate, but not wield voting power, in PSCs.

2. Please answer this question for completeness:

Will the GEF Agency play an execution role on this project?

If so, please describe that role here and the justification.

Agency Response

For this project, UNIDO will act as the Implementing Agency and is not expected to assume an execution role at this stage. Accordingly, any related voting rights in the Project Steering Committee (PSC) may be exercised as they pertain to UNIDO's implementation oversight function. Following finalization of the PSC composition, any actual or potential conflicts of interest will need to be disclosed where unavoidable, with affected PSC members having to recuse themselves from related decisions, in line with internationally recognized professional standards and good governance principles.

ADDITIONAL COMMENT MAY 19 2026: Response

UNIDO has updated the following text in the CEO Endorsement.

UNIDO will be a member of the Project Steering Committee, participating in an advisory capacity, without exercising voting rights. All decisions adopted by the Project Steering Committee shall remain subject to UNIDO's non-objection decision, exercised in its capacity as the Implementing Agency responsible for project supervision and oversight, in accordance with UNIDO's applicable rules, policies, and procedures.

5.3 Core indicators

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

b) Are the project's targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable? Are the GEF Climate Change adaptation indicators and sub-indicators for LDCF and SCCF properly documented?

Secretariat comment at CEO Endorsement Request

Yes and the project will achieve GEBs from the elimination of the PFAS foams.

Please note that the Core indicators refer to 23.6 **tons** but in the prose there is reference to **litres**. Please clarify as the values will be impacted.

Based on these results, the project must address all PFAS-related foams stored at twelve (12) highrisk facilities, with total stockpiles estimated at 23,154 litres, some exceeding 100,000 parts per billion (ppb) in PFAS concentration (Department of Sustainable Development, 2022).

The results framework provides the estimation but please clarify at onset.

Agency ResponseIn the Core Indicators section, the explanation of the methodological approach, as well as the rationale for establishing target levels for both Core and Sub-Indicators, already clarifies that an average foam density of 1.02 kg/L was used to convert liters into metric tons. Based on this assumption, multiplying 23,154 liters by 1.02 kg/L and dividing by 1,000 kg (to convert to metric tons) results in approximately 23.6 tons of foam.

5.4 Risks

- a) Is there a well-articulated assessment of risk to outcomes and identification of mitigation measures under each relevant risk category? Are mitigation measures clearly identified and realistic? Is there any omission?**
- b) Is the rating provided reflecting the residual risk to the likely achievement of intended outcomes after accounting for the expected implementation of mitigation measures?**
- c) Are environmental and social risks, impacts and management measures adequately screened and rated and consistent with requirements set out in SD/PL/03?**

Secretariat comment at CEO Endorsement RequestThe risk rating is moderate.

Agency Response

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response

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

6.1 Is the project adequately aligned with Focal Area objectives, and/or LDCF/SCCF strategy?

Secretariat comment at CEO Endorsement RequestYes the project is aligned with GEF 8 strategy.

Agency Response

6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors).

Secretariat comment at CEO Endorsement RequestYes the project is aligned with the national priorities of Saint Lucia as they wish to show leadership in PFAS elimination. Also aligned with the objective of the SC.

Agency Response

6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e., BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

7 D. Policy Requirements

7.1 Are the Policy Requirement sections completed?

Secretariat comment at CEO Endorsement Request Yes.

Agency Response

7.2 Is the Gender Action Plan uploaded?

Secretariat comment at CEO Endorsement Request

Yes.

1. As per GEF guidance, gender should be mainstreamed throughout the project document. Please ensure that the findings and actions identified in the gender analysis and gender action plan are fully integrated into the project design, rather than treated as stand alone elements. In particular, Components 1, 2, and 3 should be strengthened from a gender responsive perspectives. E.g. with gender responsive policies and the designation of gender focal points under Component 1; ensuring that women and gender experts are adequately trained in PFAS management; and explicitly targeting informal women's organizations within stakeholder engagement activities.
2. Please clarify the proposed 30% target under Output 3.2, as other components set higher targets (approximately 40%). In line with GEF ambition on gender equality, the Agency is encouraged to consider increasing this target.

Agency Response

FIRST QUESTION

The following text has been included in the different components, outcomes, and outputs as applicable:

Component 1, Outcome 1: The regulatory framework will be informed by the project's Gender Analysis and Action Plan, which identifies gender gaps in participation, employment, and decision-making, as well as differentiated exposure risks to PFAS. In this context, the development and implementation of regulatory measures will ensure inclusive stakeholder consultation processes and promote the participation of both women and men, taking into account existing disparities in leadership and technical roles. The framework will also reflect national gender policies and institutional arrangements, including coordination with the Division of Gender Affairs, to ensure that gender considerations are integrated into policy development and implementation.

Output 1.2: Implementation of the compliance framework will include the use of sex-disaggregated data and indicators, as established in the Gender Action Plan.

Component 2, Outcome 2: The implementation of the PFAS phase-out and disposal system will take into account the gender-differentiated exposure pathways identified in the Gender Analysis and Action Plan. The GAP highlights that men are predominantly represented in firefighting and industrial roles with direct occupational exposure, while women are more exposed through community and household pathways, including water use, food preparation, and caregiving responsibilities. In response, project activities will ensure that training, monitoring, and implementation processes are accessible to both women and men and reflect their different roles and exposure patterns.

Output 2.2: Monitoring systems will incorporate sex-disaggregated data collection, as defined in the Gender Action Plan, to track participation and exposure-related outcomes.

Component 3, Outcome 3: Capacity-building and knowledge management activities will be implemented in line with the Gender Analysis and Action Plan, which identifies disparities in workforce participation, access to decision-making, and exposure to PFAS risks. The GAP notes that women have higher levels of tertiary education but are underrepresented in technical and leadership roles, while men dominate operational roles with higher occupational exposure. In this context, training and awareness activities will promote inclusive participation, support the involvement of women in technical and environmental roles, and ensure that knowledge dissemination reflects the different needs and roles of women and men.

Output 3.1: Training activities will be designed in accordance with the Gender Action Plan, including the use of sex-disaggregated indicators and inclusive participation approaches.

Output 3.2: Awareness and stakeholder engagement activities will reflect gender-differentiated roles in exposure pathways and community interactions, as identified in the Gender Analysis.

SECOND QUESTION

Component 1 aims for at least 40% women's involvement in developing and implementing the regulatory framework, supporting the GAP and national gender equality goals. Likewise, Component 2, especially Outputs 2.1 and 3.1, includes gender-responsive training in PFAS management, knowledge sharing, and technical strengthening, targeting 40% women's participation to boost women's roles in technical and environmental sectors. However, for Output 3.2, which focuses on community-level workshops addressing fire risk prevention, gender, and climate-related risks, a minimum target of 30% women's participation has been established (as defined in the GAP, section 9.5, table 21).

This target reflects the specific socio-economic and sectoral context identified in the GAP, where key stakeholder groups such as fisherfolk associations and certain community-based organizations are predominantly male-dominated. As a result, considering higher participation rates of women from initial actions may be constrained by existing gender dynamics in these subsectors and organizations. Notwithstanding this contextual limitation, the project will actively implement the inclusive engagement strategies defined in the GAP such as childcare, targeted outreach, and gender-sensitive communication to maximize women's participation, with the objective of progressively reaching higher participation rates approaching gender parity. Thus, the results framework has modified the indicators in Output 3.2 to: 3 Stakeholder workshop (promoting gender parity), and 2 community workshops (30% women with a tendency to gender parity).

7.3 Is the stakeholder engagement plan uploaded?

Secretariat comment at CEO Endorsement Request
Yes.

It is well noted that agency has highlighted the importance to engage civil society and local communities. However, their roles related to project components have not been elaborated in the Stakeholder Engagement Plan (SEP). Please elaborate in table 2 (Stakeholders roles within the project) the specific roles of civil society and local communities (as well as marginalized and vulnerable populations and groups) related to project components and activities as well and project plans and means to engage and consult these in project implementation.

Agency Response

Table 1 in the Stakeholder Engagement Plan (SEP) provides concrete evidence of the project's planned approaches to engage and consult civil society and local communities during implementation. It identifies key expectations, including access to transparent information on PFAS risks, active involvement in monitoring activities, and the protection of marine and coastal ecosystems that sustain local livelihoods. At the same time, it highlights critical concerns such as potential health risks from PFAS exposure, possible job and economic disruptions during the transition, and the risk of exclusion from decision-making processes.

Table 2 in SEP has been updated for local communities and civil society.

In response, the SEP defines specific engagement measures that will guide project implementation, including the delivery of awareness campaigns, designed to be gender-sensitive, the inclusion of fisherfolk associations and civil society organizations in participatory monitoring processes, and the establishment of accessible and transparent grievance mechanisms. These measures ensure that local communities and civil society are not only informed but actively involved in project activities, enabling continuous feedback, strengthening trust, and supporting adaptive management throughout the project lifecycle.

8 Annexes

Annex A: Financing Tables

8.1 GEF Financing Table and Focal Area Elements: Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):
STAR allocation?

Secretariat comment at CEO Endorsement Request

Agency Response
Focal Area allocation?

Secretariat comment at CEO Endorsement RequestYes

Agency Response
LDCF under the principle of equitable access?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

SCCF A (SIDS)?

Secretariat comment at CEO Endorsement RequestNA

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

Secretariat comment at CEO Endorsement RequestNA

Agency Response
Focal Area Set Aside?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

8.2 Project Preparation Grant (PPG)

a) Is PPG reimbursement requested and if so, is it within the eligible cap of USD 50,000?

b) Is the use of PPG attached in Annex: Status of Utilization of Project Preparation Grant (PPG) properly itemized according to the guidelines?

Secretariat comment at CEO Endorsement RequestThe PPG table was provided. It is noted that the majority of the funds has not been spent to date.

Agency Response

The remaining budget will be used to target a detailed baseline of basic engineering of facilities and environmental monitoring of facilities where spill risks have been identified.

8.3 Source of Funds

Does the sources of funds table match with the OFP's LOE? Note: the table only captures sources of funds from the country's STAR allocation

Secretariat comment at CEO Endorsement RequestYes the OFP letter was attached and matches the amount requested.

Agency Response

8.4 Confirmed co-financing for the project, by name and type: Are the amounts, sources, and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines? e.g. Have letters of co-finance been submitted, correctly classified as investment mobilized or in-kind/recurring expenditures? If investment mobilized: is there an explanation below the table to describe the nature of co-finance? If letters are not in English, is a translation provided?

Secretariat comment at CEO Endorsement Request

1. Please clarify for Buckeye:

\$7,177,160 USD comprising of \$1,148,000 USD in the form of in-kind support and \$6,000,030 in investment is stated in their letter but the table reflects as solely in kind:

Private Sector	Buckeye St. Lucia Terminal Limited	In-kind	Recurrent expenditures	7,177,160.00
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2. Kindly confirm the UNIDO cofinancing letter.

Agency Response

The Buckeye cofinancing has been recategorized, and the UNIDO Co-financing letter has been uploaded to the platform (by now in the ESS supporting documents, since the portal does not allow us to upload the file in the co-fianning section. The issue was communicated to the GEF IT team).

Annex B: Endorsements

8.5 a) Has the project been endorsed by the GEF OFP/s of all GEF eligible participating countries and has the OFP name and position been checked against the GEF database at the time of submission?

Secretariat comment at CEO Endorsement RequestYes.

Agency Response

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

Secretariat comment at CEO Endorsement RequestYes except UNIDO's

Agency ResponseUNIDO Co-financing letter has been uploaded to the platform (by now in the ESS supporting documents, since the portal does not allow us to upload the file in the co-financing section. The issue was communicated to the GEF IT team).

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

Secretariat comment at CEO Endorsement RequestYes- UNIDO and BuckEye to be clarified.

Agency ResponseUNIDO cofinancing letter has been attached, and the Buckeye cofinancing types have been clarified in the system.

8.6 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project before the PIF submission?

Secretariat comment at CEO Endorsement RequestNA

Agency Response

Annex C: Project Results Framework

8.7 a) Have the GEF core indicators been included?

b) Have SMART indicators been used; are means of verification well thought out; do the targets correspond/are appropriate in view of the budget (too high? Too low?)

c) Are all relevant indicators sex disaggregated?

d) Is the Project Results Framework included in the Project Document pasted in the Template?

Secretariat comment at CEO Endorsement Request

Yes.

The agency has reported **only on C.I. 9**. Please also report on C.I. 11 as it is also applicable to this project.

Agency ResponseC.I. 11 has also been incorporated. Although it was explained in the methodology, it was not previously included as an indicator; it has now been added.

Annex E: Project map and coordinates

8.8 Are geo-referenced information and maps provided indicating where the project interventions will take place ?

Secretariat comment at CEO Endorsement RequestYes the coordinates and map showing the interventions is included.

Agency Response

Annex F: Environmental and Social Safeguards Screen and Rating

8.9 Have safeguard screening document and/or other ESS document(s) attached and been uploaded to the GEF Portal?

Secretariat comment at CEO Endorsement RequestYes

Agency Response

Annex G: GEF Budget template

8.10 a) Is the GEF budget template attached and appropriately filled out incl. items such as the executing partner for each budget line?

b) Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

c) Are TORs for key project staff funded by GEF grant and/or co-finance attached?

Secretariat comment at CEO Endorsement Request

1. Please reformat the budget table at Annex G in the CEO Document as it is difficult to read. The budget attached in Annex G has no grid lines and is also difficult to follow. Please also remove decimal places and decrease font size, to improve legibility.

2. Please review the Budget Table template available on the GEF website or in the [Guidelines](#) (p. 58). Please refer to the Expenditure Categories (far left column) and use those when completing the budget table. For example, 'PMC' is not an eligible Expenditure Category but a portion of the overall budget, these costs should be broken out into eligible Expenditure Categories per the GEF template. Similarly, there is no 'Train/Fellowship/Study' category; some items found here should be placed in a Training/Workshop/Meeting category, along with the 'Training' items already in the budget table.

3. When revising the Budget Table, please be aware that it should be structured so that each line is a discrete cost item, and not by activity or output-based. The Contractual Services section has many activities that seem to be related by function (e.g., trainings or comms) or topic; please aggregate these activities together if they are envisioned to be delivered by a single contractor. In the same way that the budget line for the Project Coordinator represents all the deliverables of that individual, so should each line under Contractual Services represent the sum total delivery an individual contractor.

4. The current Travel category contains a number of activities not related to travel. Please review and revise.

5. Currently, 65% of the requested GEF resources is allocated to firms/companies, which is quite large. Understanding that SL is a SIDS and individual consultants may be difficult to recruit, there may be room for more diversification. Additionally, there are a few activities in this category that are often delivered by a local consultant, such as media campaigns, stakeholder consultations, community briefings and public awareness initiatives. Please provide some insight/justification on this approach and if any changes can be considered.

SPECIFIC BUDGET COMMENTS.

Replace PEE with BCRC/SCRC.

1. What is being developed here - please clarify the type of inventory system?

Establish a computerized foam inventory system
and tracking system

\$195,000.00

2. Is this budget item linked to the database? It is implied that the database will also track. Please clarify.

Implementation of the foam tracking system -
correct deployment validation

\$25,000.00

3. Activities under Equipment are duplicated please clarify?

4. Please clarify if this is travel for international consultants?

International Meetings	Contract Basel-compliant hazardous waste disposal/export execution (includes sampling, packaging, licensed transport, Basel export fees, overseas destruction, permits, audits for controlling phase-out results)	\$24,000.00	\$24,000.00
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5. This is a significant cost- please clarify?

6. Under the training activities there is a train the trainer activity, training at fire stations etc and training of inspectors. Are all these trainings perceived as discrete? There is also training activities under contractual services.

7. Please clarify this line item:

Operational cost - office supplies, others	\$20,000.00
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8. Please clarify this item that falls under travel: Certify converted facilities (containment tanks, spill prevention conditions, spill response kits, monitoring) valued at \$22,000 and the following on building enforcement capacity. On the \$22,000 spend is that for international consultants to travel?

Build enforcement and compliance capacity	\$2,000.00
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Agency Response

1. Annex G: Grid lines have been included in the budget table for facilitating lecture, decimal places have been removed
2. Expenditure categories have been reviewed based on the GEF guidelines example. The previous budget table included the UNIDO budget lines, which could lead to some misunderstandings about the types of expenses.
3. The budget is reported by component. Contractual services considered previously were UNIDO budget lines, current budget has been reviewed using GEF expenditure categories.
4. Travel has been described and related to the corresponding activities.
5. Based on the new distribution by expenditure category, the % of distribution changed. The Budget table file has an additional table that includes a summary of expenditures including % distribution.

SPECIFIC BUDGET COMMENTS

1. The computerized foam inventory (USD 195,000) and tracking system is software for monitoring all foam products and, later on, potentially add additional CIU categories related to PFAS, to be implemented in national systems for customs use. The computerized foam inventory and tracking system would directly address the lack of lifecycle control (especially at the import and distribution/final disposal stages). By integrating such software into customs operations, authorities in Saint Lucia could systematically record what foam products enter the country, in what quantities, and potentially who receives them. This improves traceability, supports risk assessment, and creates a data foundation for future regulatory enforcement. Expanding it to cover additional CIU categories linked to PFAS would further strengthen oversight across related chemical sectors.
2. The USD 25,000 for the Implementation of the foam tracking system ? correct deployment validation, is actually the cost for testing the software in trials with stakeholders, mainly importers, and initial distributors/consumers.
3. Other equipment comments are now reflected differently due to the reorganization of expenditure categories.
4. The cost of travel associated with Contract Basel-compliant hazardous waste disposal/export execution accompaniment reflects the cost of validating the final destruction outside the country, requiring international travel by 1 or 2 delegates.

5. All activities considered training have been categorized accordingly; the misleading categories resulted from using UNIDO budget lines within a more detailed breakdown structure. Travel associated with certified converted facilities includes personnel from the government and the fire department to participate in the process, and the same applies to building enforcement and compliance capacity.
6. All training activities have been considered as training in the budget table.
7. Operational Cost - office suppliers will be used directly for the PMU and its interaction with the Fire Service Department on a regular basis, including office supplies and PPE.
8. There was a mistake in the 22,000 figure, which does not include international travel for certifiers who are considered international consultants and will provide a full service, including their tickets. The budget of 22,000 has been shared with the travel associated with building enforcement and compliance capacity (previously 2000), so both activities could include the presence of national authorities and local technical delegates. New budget table is uploaded.

19 May

The Replacement of PEE with BCRC/SCRC was included in the budget table. Please refer to Annex G

Annex H: NGI Relevant Annexes

8.11 a) Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments.

b) Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments.

c) Is the Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat comment at CEO Endorsement Request NA

Agency Response

Additional Annexes

9. GEFSEC DECISION

9.1. GEFSEC Recommendation Is the project recommended for approval

Secretariat comment at CEO Endorsement Request

9.2 Additional Comments to be considered by the Agency during the inception and implementation phase

Secretariat comment at CEO Endorsement Request

9.3 Review Dates

	1SMSP CEO Approval	Response to Secretariat comments
First Review		5/5/2026
Additional Review (as necessary)		5/19/2026
Additional Review (as necessary)		

1SMSP CEO
Approval

Response to Secretariat
comments

Additional Review (as
necessary)

Additional Review (as
necessary)