

Circular and POPs-free Plastics in Africa

Basic Information

GEF ID

11049

Countries

Regional (Kenya, Nigeria, South Africa, Uganda, Zimbabwe)

Project Title

Circular and POPs-free Plastics in Africa

GEF Agency(ies)

UNEP

Agency ID

GEF Focal Area(s)

Chemicals and Waste

Program Manager

Ibrahima Sow

1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

a) Yes, the project is eligible for funding under the Chemicals and Waste window

b) Executing Partner: Explain why the African Institute polarizing two project countries (South Africa and Zimbabwe) is not considered as a potential EP

- Project Information: Please remove "Regional, Africa" from the field Countries.

Agency's Comments

Africa Institute was indeed considered as an Executing Agency and consulted during PPG. As executing partners for two co-financing projects (Norwegian retailers projects), Africa Institute will be closely involved in the project delivery arrangements, although not as the main Executing Agency. The Basel Convention Coordinating Centre for Training and Technology Transfer for the African Region in Lagos was ultimately selected due to in-house capacity for POPs analysis which will be required to confirm POPs in plastics and establish sustainable capacity in the region for continued monitoring. In addition, the implementing agency is committed to working with all the BRS Regional Centres to ensure capacity building and reduce reliance on a small number of high performing Executing Agencies.

Re Project Information: This change has been made in the GEF portal. The category (global/ regional/ country) is still selected as 'Regional' to allow multiple countries to be selected in the below field.

2. Project Summary

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?

Secretariat's Comments Yes

Agency's Comments

3 Indicative Project Overview

3.1 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?

Secretariat's Comments Yes

Agency's Comments

3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?

Secretariat's Comments Yes

Agency's Comments

3.3 a) Are the components adequately funded?

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

c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

Agency's Comments

4 Project Outline

A. Project Rationale

4.1 SITUATION ANALYSIS

a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?

b) Are the key barriers and enablers identified?

Secretariat's Comments Yes

Agency's Comments

4.2 JUSTIFICATION FOR PROJECT

- a) Is there an indication of why the project approach has been selected over other potential options?
- b) Does it ensure resilience to future changes in the drivers?
- c) 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?
- d) are the relevant stakeholders and their roles adequately described?

Secretariat's Comments

- a) Yes
- b): Yes
- c): Please elaborate the section on the enforcement plans, in particular explain what concrete measures are (or will be put in place) to address the illegal importation of POPs-containing products which is recurrent in the project countries
- d) Yes

Agency's Comments As described in the baseline, there are currently limited regulations in countries explicitly prohibiting the import of POPs-containing electronics or vehicles. The project will develop those regulations under Output 1.1, and then take concrete measures to enforce them as described under Output 1.3 on Enforcement plans. The concrete measures identified in the early consultations during PIF preparation are few and will be further developed during PPG phase. They currently include a) consultations to ensure widespread awareness of new regulatory limits and measures e.g. electronics labels or vehicle standards; b) ensuring that POPs-containing plastics are in scope for enforcement and customs measures in place for other plastic bans and c) support for monitoring and analysis to identify POPs presence in plastic goods.

5 B. Project Description

5.1 THEORY OF CHANGE

- a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?
- b) Are the key outputs of each component defined (where possible)?

Secretariat's Comments Yes

Agency's Comments

5.2 INCREMENTAL/ADDITIONAL COST REASONING

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

Secretariat's Comments

Agency's Comments

5.3 IMPLEMENTATION FRAMEWORK

- a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?
- b) Comments to proposed agency execution support (if agency expects to request exception).
- c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area
- d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication

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

Secretariat's Comments a): Please explain why the African Institute polarizing two project countries (South Africa and Zimbabwe) is not considered as a potential EP

Agency's Comments See response to comment 1b above.

5.4 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 indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?

Secretariat's Comments The targets for indicator 9 need to cover only what can be achieved by project completion. The agency's comment seems to indicate it adds results expected to be achieved after completion. It states " The estimated GEBs are based on the assumption that the project can influence 5% of annual reduction for the imported used vehicles produced before 2014, and 1% of annual reduction for the electronics products containing PBDEs into the five countries during five years' time (3 years during project period, and 2 years after project's conclusion)."

Agency's Comments Changes have been made accordingly in the Portal and highlighted in the PIF document (see Section on Core Indicators).

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

Secretariat's Comments NA

Agency's Comments

5.6 RISKS

- a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?
- b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?
- c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?

Secretariat's Comments Yes

Agency's Comments

5.7 Qualitative assessment

- a) Does the project intend to be well integrated, durable, and transformative?
- b) Is there potential for innovation and scaling-up?
- c) Will the project contribute to an improved alignment of national policies (policy coherence)?

Secretariat's Comments

The potential for scaling up needs to be better articulated. In particular, how the project countries could be considered in the context of EAC.

The potential for scaling up needs to be better articulated in particular, how the project outcomes could be considered in the context of ERE, ECOWAS and SADC

Agency's Comments The project identifies limited scaling up as one of the key barriers in the problem analysis and proposes a specific output 3.4 on scaling up through regional and global collaborations. Extra information has been provided referencing the alignment with regional economic commissions which have indeed identified relevant interventions and priorities. Section C on alignment with policies, the Stakeholder Engagement Plan in Appendix 3, and Appendix 1 have been updated and changes highlighted in the text.

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

6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?

Secretariat's Comments Yes

Agency's Comments

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's Comments

Please explain how the project is aligned with countries updated NIPs

The statement mentioning that Nigeria is the only project country that has ratified the Basel Convention is not accurate. Please correct (i trust you meant here the Basel AMENDMENT)

Import of plastic wastes are often done through uncontrolled e-waste imports. Please explain how the project would reduce the import of plastic wastes containing POPs, in particular in Nigeria and South Africa, the largest Plastic importers in the region
Regional priorities are not clearly articulated - Please provide elements of relevant strategies and policies in the context of EAC, SADC and ECOWAS for potential scaling up in countries polarized by these regional economic communities.

Agency's Comments

Re Updated NIPs: Most of the countries' data on POPs in plastics is coming from NIPs and are providing the proof of their presence. NIPs covering the POPs used in plastics have been developed for all project countries but South-Africa, although the country is currently updating its NIP. This is mentioned in the project rationale section (p. 14). Section 3 (national baselines) of appendix 1, gives an overview of what NIPs have been transmitted and what data is included.

Re Basel ratifications: Noted. This has been corrected in the PIF document.

Re Import of plastic waste: Please see response to Review Sheet comment 4.2 on enforcement plans above.

Re Regional priorities: See response to Review Sheet comment 5.7 above.

7 D. Policy Requirements

7.1 Is the Policy Requirements section completed?

Secretariat's Comments

Agency's Comments

7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?

Secretariat's Comments Please provide detailed information concerning the consultation process in the project countries during the project identification phase

Agency's Comments More information on the consultations with project countries during the PIF stage has been provided in section D on stakeholder engagement.

8 Annexes

Annex A: Financing Tables

8.1 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's Comments

Agency's Comments

Focal Area allocation?

Secretariat's Comments Yes

Agency's Comments

LDCF under the principle of equitable access?

Secretariat's Comments NA

Agency's Comments

SCCF A (SIDS)?

Secretariat's Comments NA

Agency's Comments

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

Secretariat's Comments NA

Agency's Comments

Focal Area Set Aside?

Secretariat's Comments NA

Agency's Comments

8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments Yes

Agency's Comments

8.3 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?

Secretariat's Comments

Agency's Comments

Annex B: Endorsements

8.4 Has the project been endorsed by the country's(ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?

Secretariat's Comments

LoEs from Kenya, South Africa and Uganda are missing. Please provide the said letters.

Agency's Comments All letters of endorsement have been uploaded as a single file.

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

Secretariat's Comments No, OPF endorsement letters need to be uploaded as a single document.

Agency's Comments All letters of endorsement have been uploaded as a single file.

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

Secretariat's Comments

Agency's Comments

8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?

Secretariat's Comments NA

Agency's Comments

Annex C: Project Location

8.6 Is there preliminary georeferenced information and a map of the project's intended location?

Secretariat's Comments No. UNEP indicated that the related annex will be provided with the CEO endorsement request.

Agency's Comments Yes, these will be provided at the CEO Endorsement request.

Annex D: Safeguards Screen and Rating

8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?

Secretariat's Comments Yes

Agency's Comments

Annex E: Rio Markers

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

Secretariat's Comments Yes

Agency's Comments

Annex F: Taxonomy Worksheet

8.9 Is the project properly tagged with the appropriate keywords?

Secretariat's Comments Yes

Agency's Comments

Annex G: NGI Relevant Annexes

8.10 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. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.

Secretariat's Comments NA

Agency's Comments

9 GEFSEC Decision

9.1 Is the PIF and PPG (if requested) recommended for technical clearance?

Secretariat's Comments

Yes

Cover memo

Plastics containing POPs additives have adverse effects on the human health and environment through direct leakage of additives during all life cycle stages and release of uPOPs when burnt in uncontrolled conditions. POPs in plastics value chains also limits circularity. As producers but mainly importer of these products, with high rates of plastic mismanagement/open dumping, low segregation, limited formal circular businesses, and as successful experiences are often not scaled-up, Africa faces a problem with high levels of plastic pollution releasing POPs when plastic products are openly dumped or burned.

Africa is a contributor to global plastic pollution due to macro and micro-plastic loss to the environment. A global ranking of 192 countries on plastic waste generation indicates that two of the project countries (Nigeria and South Africa) occupy top positions. The continent also has the highest proportion of mis-managed plastic waste globally which is a direct source of releases of POPs into the local and global environments.

Open dumping, often associated with burning, is the predominant disposal method used in Africa. Durable plastic components of key waste streams highlighted in Stockholm Convention National Implementation Plans (NIPs) require specialized waste management approaches for hazardous wastes, which are not available or affordable in many countries. Any plastics that contain halogens may form dioxins and furans (uPOPs) when burnt in uncontrolled conditions. UPOPs have negative developmental effects on the nervous system and interfere with mechanisms of the endocrine system. The presence of POPs in plastics value chains also limits circularity in the plastics economy, as the POPs-contaminated materials cannot be safely reused and recycled or re-enter the value chain.

The project aims to reduce the use of POPs in plastics-containing products and uPOPs generation by applying circular economy approaches through the development of strategies targeting plastics containing POPs, circular economy practices to reduce pollution from plastics containing POPs, environmental sound management of plastics containing waste and Knowledge management, capacity building, and communication

It is innovative in being the first plastics sector project to directly target POPs in plastics. By taking a circular/upstream approach (controlling imports of plastics that cannot be safely managed), it is highly complementary but distinct from projects/initiatives that seek to improve ESM capacity. The project intends to prevent 56.9 tonnes of PBDEs, 49.1 gTEQ of uPOPs emissions, and 62,687 metric tons of CO₂eq from entering the environment. 9,000 people (50% female) will be direct beneficiaries of the investment.

Agency's Comments

9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval

Secretariat's Comments

21 October 2022: Regarding African Institute, I presume your intention was to write will be consulted during PPG as the PPG is not implemented yet.

Please consult with the Adrican Institue as a potential Executing Agency during the PPG Phase

Agency's Comments

Review Dates

	PIF Review	Agency Response
First Review	10/20/2022	10/21/2022
Additional Review (as necessary)	10/21/2022	
Additional Review (as necessary)		
Additional Review (as necessary)		
Additional Review (as necessary)		

