

REVISED STAP SCREENING TEMPLATE, OCTOBER 2022

GEF ID	11049
Project title	Circular and POPs-free Plastics in Africa
Date of screen	8 November 2022
STAP Panel Member	Miriam diamond
STAP Secretariat	Sunday Leonard

1. Summary of STAP's views of the project

This project aims to “reduce the use of POPs in plastics-containing products and uPOPs generation by applying circular economy approaches” through the following:

1. develop strategies for targeting plastics containing POPs
2. promote circular economy practices to reduce pollution from plastics containing POPs
3. promote environmentally sound management of plastics-containing wastes
4. promote knowledge management, capacity building, communication

Although many restrictions have been placed on POPs, POPs-containing plastics continue to enter waste streams and require appropriate waste management to minimize exposures to, in particular, waste handlers that are predominantly women and the environment. Further, the common waste management practice of open burning of POPs-containing plastics creates hazardous by-products (e.g., mixed halogenated dioxins and furans, also PAH, which were not mentioned). The open burning of all plastics and organic creates uPOPs.

The strengths of the project are that it builds on activities underway through the GEF and other agencies; the proposal seeks to bring in those partners to help achieve the goal of reducing POPs and uPOPs from plastics; the communication plan also builds on existing resources; and the project referenced gender-sensitive interventions, including in action plans and knowledge sharing and communication plan.

However, the project has some areas requiring improvement, including inconsistent definitions, unclear scope and focus, and inadequate and incomplete theory of change. Given the lack of coherence and focus, it is unclear whether the proposed outputs are appropriate, whether the key stakeholders have been included, and thus whether the project will deliver on the intended impacts.

So, while this is a worthwhile and needed project, STAP believes that the proposal needs significant revision and clarification to ensure the project can deliver its objectives. Please see sections 2 and 3 for more information.

Note: STAP is willing and offers to engage with the agency team to help improve the proposal and ensure that it delivers on its stated objectives.

Note to STAP screeners: a summary of STAP's view of the project (not of the project itself), covering both strengths and weaknesses.

STAP's assessment*

- Concur - STAP acknowledges that the concept has scientific and technical merit
- Minor - STAP has identified some scientific and technical points to be addressed in project design
- Major - STAP has identified significant concerns to be addressed in project design**

Please contact the STAP Secretariat if you would like to discuss.

2. Project rationale, and project description – are they sound?

See annex on STAP's screening guidelines.

- The proposal explains the magnitude of the plastic-waste problem in numerous African countries, but the connection to POPs is not clear and consistent. The proposal needs to provide background information on POP-containing plastics requiring waste management or show that such information is unavailable. In those waste streams, which product streams contribute most to POPs-containing plastics, and what are their sources – how much is legally and illegally imported vs. locally manufactured? The proposal needs to clarify that uPOPs are created from the open burning of all plastics and organic material, not just POP-containing plastics. The purpose for mentioning other hazardous chemicals in plastics is not evident (will these other hazardous chemicals be addressed in the proposal?), as is the mention of additional product categories other than vehicles and electronics, such as building and construction materials, toys, food and beverage packaging, textiles and clothing (is the intention to consider these categories and if so, how and why?). The proposal does not clarify the targeted sector within the various plastic use and justification for focusing on the sector.
- Some root causes and drivers of the problem were described, as well as barriers to circularity, but these need to be more exhaustive. Drivers could be economic, social, demographic, technological, political, and institutional factors facilitating the problem. And they need to be described from a systems perspective, including the interaction between drivers and how they contribute to the challenges the project seeks to address.
- While some element of future trends was included, the proposal did not adequately account for how drivers could unfold and influence the targeted plastic products in the future. Assumptions need to be articulated. For example, the proposed solutions for POPs-containing plastics seem to assume a constant supply of such plastics, but the occurrence of intentionally added POPs in final products is decreasing. Will solutions prevail over illegal waste importation and handling practices?
- Useful baseline information, both in terms of the current situation and ongoing projections, was presented. The project design also needs to consider activities and lessons learned related to e-waste management, given the considerable effort expended on managing e-waste.
- A theory of change (ToC) diagram was presented along with some narrative text. However, the ToC is inadequate and incomplete. Assumptions and drivers were entirely missing, which weakens the connection between outputs and outcomes, leading to intended impacts. The interventions/activities that will lead to achieving project outputs, outcomes, and impacts are also missing. Also, the project components described in the narrative under the project description need to be consistent in other parts of the proposal.
- The project components were insufficiently explained and required clear descriptions of how they would lead to outcomes. For example, what is the argument supporting the proposal that eco-labeling would be a useful approach to controlling POPs-plastics? Eco-labelling only applies to newly produced products that should not contain POPs, and eco-labeling requires an infrastructure to develop definitions and coordinate its use, along with consumer buy-in. How would Extended Producer Responsibility help to achieve the intended impact if the problem with POPs-containing plastics lies in imported used vehicles and electronics? Questions such as these reinforce the importance of bringing attention to drivers and assumptions.
- Further to the above, the logic of the intervention requires more clarity. There is a mix-up of different types of plastic products, waste plastics vs. plastic products, plus the context of the targeted countries. Is the project mainly targeting electronic and vehicle plastics? If so, do the targeted African countries produce plastics for these sectors, or is the source mainly for importing used products? If the countries do not manufacture new POP-containing plastic products, or if they are minimal, why does the project have plastic manufacturing as a component? Are there other plastic manufacturing sectors being targeted in the project? All of these are not clear from the project components.
- Further on the targeted sectors, the last paragraph of Component 2 indicates that the project will target plastic products and applications in industries such as food and beverage, agriculture, recreation, fishing, and tourism. It is unclear how these sectors fit into the context of this project. Do the plastics in these sectors contain POPs? If not, why are they being targeted? If the reason is that they are being produced in the countries, what is the benefit to the project, or why is the intervention focusing on manufacturing if they do not contain POPs? Or do the plastic resins imported for manufacturing these products already contain POPs? If this is included mainly because they are burnt at their end of life, then the ideal intervention is to prevent or reduce their use in the first place. There are many questions that make the

logic of the planned interventions unclear, highlighting the need for systems analysis to understand the issues and the appropriate leverage point to intervene effectively.

- In Component 1, the proposal indicates that policy coherence will be ensured through the project’s regional approach. But it is unclear what this means. Does this refer to consistency in policies across the countries? While consistency in policies across countries is useful, the reason for this is unclear. Do the countries trade plastic products with each other, or is there any other form of plastic flow between them? Furthermore, policy coherence, as defined by the [OECD](#), means “the systematic promotion of mutually reinforcing policy actions across government departments and agencies creating synergies towards achieving the agreed objectives” or by [STAP](#) as “an approach to integrate environmental objectives into domestic policymaking by fostering synergies, maximizing benefits, and managing trade-offs across economic, social, and environmental policy areas, and by balancing domestic policy objectives with commitments under the multilateral environmental agreements.” This is an essential aspect that the project needs to address. For example, how do fiscal policies directly or indirectly influence the flow of targeted plastic products into the country? How will labor laws influence the ability to address the challenges in the sector? An analysis of relevant existing policies and their coherence in each country is essential to be carried out, and measures for enhancing synergies and minimizing trade-offs need to be identified and incorporated as part of the activities in Component 1.
- Component 3 is unclear whether it will go beyond waste characterization, ESM strategies, practices, standards development, and technology options identification to actually demonstrate the ESM of plastic waste containing POPs. A practical demonstration of ESM is required to generate direct GEBs in the project, so this needs to be made clear.
- Technical capacity needs to be explicitly considered. Experience has shown the difficulties of building inventories of POPs in some countries. How does this proposal build off of experiences with building inventories of, for example, PBDEs in Nigeria? Identifying POPs-containing plastics requires analytical tools, which are costly to purchase and need the expertise to operate and money to keep the equipment operative, e.g., XRF for screening metals in plastics. Will efforts to improve legislation, e.g., national regulations to comply with the Basel Convention Plastics Amendment, be worthwhile if not accompanied by technical means of testing waste for POPs?
- The project references gender-specific approaches in several outputs but without a logical and well-justified case for how these activities will lead to the intended impacts. As it is currently, the gender dimension of the project seems more like word-dropping.
- The proposal identified regional and global collaborations that will facilitate project knowledge dissemination, including AMCEN, PAGE, Switch Africa Green, GPAP, PACE, African Circular Economy Alliance, African Circular Economy Network, Ellen MacArthur Foundation, Green Growth Knowledge Platform, and SAICM Knowledge Platform. The proposal indicated that the project communication strategy would be developed at the PPG stage. It is essential that the project knowledge management goes beyond communication and be strategic on how lessons would be curated, disseminated, and used to enhance scaling regionally and globally.
- It is vital that the proponent note that the reduction of uPOPs is not a co-benefit but part of the main GEB of the project. Also, climate benefits should not be seen as a co-benefit but as an essential multiple GEB of the project since this is part of the GEF core indicators. See [STAP advisory document](#) on “refining the tracking of co-benefits in future GEF investments” for an explanation of these terms.
- Further to the above, information on how the estimate of climate benefits (greenhouse gas emissions reduction) was calculated, including the interventions that will lead to it and the underlying assumptions, should be provided. The information provided only presents the estimates of that of POPs/uPOPs.

Note: provide a general appraisal, asking whether relevant screening guideline questions have been addressed adequately – not all the questions will be relevant to all proposals; no need to comment on every question, only those needing more attention, noting any done very well, but ensure that all are considered. Comments should be helpful, evaluative, and qualitative, rather than yes/no.

3. Specific points to be addressed, and suggestions

Based on the issues raised above, STAP recommends that the following should be addressed:

- Improve the project rationale by using consistent definitions of the problem and being more explicit about what the problem(s) is(are). The issue of POPs-containing plastic waste (that requires specific ESM handling) needs to be distinguished from uPOPs generation from all plastic (and organic) waste handled by open burning. What is meant by “circularity” – does this include using plastics from imported used goods to produce new items domestically, is energy-from-waste included in circularity?
- Clarify the scope of the problem. Data should be presented to allow the distinction between the sources of waste streams and information essential to developing appropriate solutions. For example, data are needed to approximate POPs-containing plastics entering the countries from importation (e.g., used vehicles and electronics) vs. domestically produced POPs-containing plastics. If this information is not known, then this data gap should be clearly flagged, and measures proposed to fill the gap should be followed by solution options.
- The above point begs the question of considering uncertain futures that should be considered; in other words, how would the problem shift according to changes in drivers and whether assumptions were correct?
- Completely revised the theory of change narrative and diagram to address the comments in Section 2. Assumptions need to be articulated for all solutions throughout the ToC. For example, the temporal trends in the use of POPs in plastics need to be considered since there is a downward trend in POPs use in vehicles and electronics. The ToC diagram should include the interventions/activities that will result in the expected output and outcomes and show the pathway leading to the overarching project impact.
- Data and ToC are needed to underpin proposed solutions. For example, data (current and temporal trends) are necessary to distinguish imports vs. domestic manufacturing, and the temporal trends require analysis to understand how circularity can be achieved, e.g., how robust are domestic markets for recycled plastics? The cost of waste management is a crucial driver since informal dumping is so inexpensive. How can ESM of POP-containing waste be facilitated and financed? In turn, this requires an analysis of the economic and institutional feasibility of building and maintaining facilities to enable ESM of POPs-containing wastes. Why would waste segregation reduce POPs and uPOPs emissions without ESM? (What will ensure that waste segregation is coupled with ESM?).
- Be more strategic on the intended project interventions and provide more details and clarity on the intended interventions/activities (see comments in section 2). Make clear which plastic sectors the project is targeting with justifications and information on the type of circular economy interventions/activities being proposed for each sector. And address the issue of technical capacity in the countries.
- Incorporate policy coherence activities into the project, including analyzing existing policy in each country to identify synergies and trade-offs with the project objective and options to address the trade-offs and maximize synergies. Consider the role of regional cooperation and implementation.
- In line with the above, consider how reuse, repair, and refurbish solutions can be implemented for largely imported goods if parts aren’t available or if parts can be obtained through waste and repair networks. Do you want to increase the longevity of POP-containing products like furniture, which are a source of POPs exposure to those using the furniture? Solutions to reducing emissions of POPs need to be clearly distinguished from solutions to reduce uPOPs, where the latter received less attention.
- Provide more clarity on the gender dimension of the project. What concrete solutions are expected from the components of the proposal that address gender? What is expected from a gender-sensitive policy review? What does a gender-responsive pilot project look like, and what’s needed to make it successful?
- Make clear in the project description which stakeholders have been engaged (or will be engaged) and ensure that they are appropriate for achieving the project objective. For example, stakeholders that could implement Extended Producer Responsibility or could bring about business innovation in plastic manufacturing (if this is, in fact, a source of POPs-containing plastics and an appropriate project activity), or those that can support project outcome scale up.
- Provide details of how the GEBs, especially greenhouse gas emissions reduction, were estimated, including the specific activities that will lead to the benefits and the underlying assumptions.

Note: number key points clearly and provide useful information or suggestions, including key literature where relevant. Completed screens should be no more than two or three pages in length.

*categories under review, subject to future revision

ANNEX: STAP'S SCREENING GUIDELINES

1. How well does the proposal explain the problem and issues to be addressed in the context of the **system** within which the problem sits and its drivers (e.g. population growth, economic development, climate change, sociocultural and political factors, and technological changes), including how the various components of the system interact?
2. Does the project indicate how **uncertain futures** could unfold (e.g. using simple **narratives**), based on an understanding of the trends and interactions between the key elements of the system and its drivers?
3. Does the project describe the **baseline** problem and how it may evolve in the future in the absence of the project; and then identify the outcomes that the project seeks to achieve, how these outcomes will change the baseline, and what the key **barriers** and **enablers** are to achieving those outcomes?
4. Are the project's **objectives** well formulated and justified in relation to this system context? Is there a convincing explanation as to **why this particular project** has been selected in preference to other options, in the light of how the future may unfold?
5. How well does the **theory of change** provide an "explicit account of how and why the proposed interventions would achieve their intended outcomes and goal, based on outlining a set of key causal pathways arising from the activities and outputs of the interventions and the assumptions underlying these causal connections".
 - Does the project logic show how the project would ensure that expected outcomes are **enduring** and resilient to possible future changes identified in question 2 above, and to the effects of any conflicting policies (see question 9 below).
 - Is the theory of change grounded on a solid scientific foundation, and is it aligned with current scientific knowledge?
 - Does it explicitly consider how any necessary **institutional and behavioral** changes are to be achieved?
 - Does the theory of change diagram convincingly show the overall project logic, including causal pathways and outcomes?
6. Are the project **components** (interventions and activities) identified in the theory of change each described in sufficient detail to discern the main thrust and basis (including scientific) of the proposed solutions, how they address the problem, their justification as a robust solution, and the critical assumptions and risks to achieving them?
7. How likely is the project to generate global environmental benefits which would not have accrued without the GEF project (**additionality**)?
8. Does the project convincingly identify the relevant **stakeholders**, and their anticipated roles and responsibilities? is there an adequate explanation of how stakeholders will contribute to the development and implementation of the project, and how they will benefit from the project to ensure enduring global environmental benefits, e.g. through co-benefits?

9. Does the description adequately explain:

- how the project will build on prior investments and complement current investments, both GEF and non-GEF,
- how the project incorporates **lessons learned** from previous projects in the country and region, and more widely from projects addressing similar issues elsewhere; and
- how country policies that are contradictory to the intended outcomes of the project (identified in section C) will be addressed (**policy coherence**)?

10. How adequate is the project's approach to generating, managing and exchanging **knowledge**, and how will lessons learned be captured for adaptive management and for the benefit of future projects?

11. Innovation and transformation:

- If the project is intended to be **innovative**: to what degree is it innovative, how will this ambition be achieved, how will barriers and enablers be addressed, and how might scaling be achieved?
- If the project is intended to be **transformative**: how well do the project's objectives contribute to transformative change, and are they sufficient to contribute to enduring, transformational change at a sufficient scale to deliver a step improvement in one or more GEBs? Is the proposed logic to achieve the goal credible, addressing necessary changes in institutions, social or cultural norms? Are barriers and enablers to scaling be addressed? And how will enduring scaling be achieved?

12. Have **risks** to the project design and implementation been identified appropriately in the risk table in section B, and have suitable mitigation measures been incorporated? (NB: risks to the durability of project outcomes from future changes in drivers should have been reflected in the theory of change and in project design, not in this table.)