



GEF-6 GEF SECRETARIAT REVIEW FOR FULL-SIZED/MEDIUM-SIZED PROJECTS THE GEF/LDCF/SCCF TRUST FUND

GEF ID:	9076		
Country/Region:	Bangladesh		
Project Title:	Pesticide Risk Reduction in Bangladesh		
GEF Agency:	FAO	GEF Agency Project ID:	
Type of Trust Fund:	GEF Trust Fund	GEF Focal Area (s):	Chemicals and Waste
GEF-6 Focal Area/ LDCF/SCCF Objective (s):	CW-2 Program 3;		
Anticipated Financing PPG:	\$200,000	Project Grant:	\$8,295,000
Co-financing:	\$17,340,000	Total Project Cost:	\$25,635,000
PIF Approval:		Council Approval/Expected:	
CEO Endorsement/Approval		Expected Project Start Date:	
Program Manager:	Anil Sookdeo	Agency Contact Person:	Mike Robson

PIF Review			
Review Criteria	Questions	Secretariat Comment	Agency Response
Project Consistency	1. Is the project aligned with the relevant GEF strategic objectives and results framework? ¹	3/17/15 (AS) The project partially meets the GEF 6 chemicals and waste program 3 objectives in that it seeks to dispose stockpiles of DDT. Addressing non-POPs chemicals however do not fall under the mandate of the Stockholm Convention and are not part of the focal area objectives. The proponent should revise the project design to use GEF resources to address eligible chemicals.	

¹ For BD projects: has the project explicitly articulated which Aichi Target(s) the project will help achieve and are SMART indicators identified, that will be used to track the project's contribution toward achieving the Aichi Target(s)?

PIF Review

Review Criteria	Questions	Secretariat Comment	Agency Response
		<p>4/9/15 (AS) - GEF resources can only be used to treat with chemicals under the Stockholm Convention. In this regard an assessment of the non-DDT obsolete pesticides would need to be done to establish if there is a presence of POPs chemicals/waste. All non-POPs chemicals would have to be treated from non-GEF resources. In designing the project therefore, the proponents should take this into account in the financing package for the project and adequately prepare for the possible scenarios.</p> <p>7/14/2015 (AS) - While the non-eligible chemicals references have been removed from the project the cost of the project remains the same. Please clarify.</p> <p>9/28/15 (AS) - Comment cleared</p>	
	2. Is the project consistent with the recipient country's national strategies and plans or reports and assessments under relevant conventions?	Yes. The country's NIP identifies DDT stockpiles as a priority area.	
Project Design	3. Does the PIF sufficiently indicate the drivers ² of global environmental degradation, issues of sustainability, market transformation, scaling, and innovation?	The project seeks to address an obsolete stockpile of DDT. In this regard the features of scale up, market transformation etc, do not apply.	

² Need not apply to LDCF/SCCF projects.

PIF Review

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	<p>4. Is the project designed with sound incremental reasoning?</p>	<p>The design of the disposal component is clear however the components dealing with highly hazardous pesticides is not. Additionally can the project proponents clarify if the DDT being used or suspected of being used in fish drying is coming from the stockpiles or is it coming from another source. If the former then why is there a need for the activity?</p> <p>4/9/15 (AS) - HHP are to be discussed as a SAICM priority at ICCM 4 in 2015. For the GEF support to SAICM related chemicals, the support is limited to lead in paints, chemicals in products and e-waste. HHP's were not envisaged to be covered in GEF 6 and as such the inclusion of components covering HHP's are not appropriate. They can be covered in the co-financing package for the project.</p> <p>In regard to the use of DDT for fish drying - the DDT action plan in Bangladesh's NIP, which was submitted in 2009 did identify this as a potential issue in specific places in Bangladesh. Since then has any work been done to try to identify the source and what are the results? Has the problem become more widespread or is it still limited to the regions</p>	

PIF Review

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		<p>identified in the NIP? Would such an activity be more appropriate in the context of the NIP update and review?</p> <p>7/14/2015 (AS) - We agree with the responses made to the comments related to fish drying. We agree that there is a health risk posed here but would urge that work be done during the PPG phase to elaborate on this aspect and the costs that would be incurred since mainly investigative work is being proposed in the project.</p> <p>9/28/15 (AS) - Comment cleared - the agency is required to provide justifications at CEO endorsement for inclusion of fish drying once the issue is elaborated during the PPG stage.</p>	
	<p>5. Are the components in Table B sound and sufficiently clear and appropriate to achieve project objectives and the GEBs?</p>	<p>No. The components dealing with highly hazardous pesticides is not a GEF eligible activity as these chemicals do not fall under the chemicals covered by the Stockholm Convention. Additionally it is unclear what types of activities are being contemplated for the container management program. Is the intention of support/facilitate the sound recycling of these containers to prevent combustion of chlorinated plastics or is land filling or other methods being contemplated?</p>	

PIF Review

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		<p>4/9/15 (AS) - the reply on the container management program are acceptable. The response on the inclusion of HHP is not. As stated previously, HHP's are neither POPs nor covered under the three specific SAICM areas in the GEF 6 chemicals and waste strategy. The inclusion makes sense in a national pesticide management context but we fail to see the global environmental benefits that would accrue from these actions. The proponents should include these only under the non-GEF resources.</p> <p>7/14/2015 (AS) - Responses provided by the proponents sufficiently address the comments of 4/19/15. Comment cleared.</p>	
	6. Are socio-economic aspects, including relevant gender elements, indigenous people, and CSOs considered?	Yes	
Availability of Resources	7. Is the proposed Grant (including the Agency fee) within the resources available from (mark all that apply):		
	<ul style="list-style-type: none"> • The STAR allocation? 		
	<ul style="list-style-type: none"> • The focal area allocation? 	<p>The project proposes to dispose of 1000 tons of DDT. For the cost of the project the cost effectiveness is above what is usually expected for disposal projects of a similar design.</p> <p>4/9/15 (AS) - Comment is cleared</p>	

PIF Review

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		based on the explanation provided, however, dis-aggregated costs for the handling, re-packaging, transport and disposal must be presented in PIR, MTR and TR's during the course of the project implementation.	
	<ul style="list-style-type: none"> • The LDCF under the principle of equitable access 		
	<ul style="list-style-type: none"> • The SCCF (Adaptation or Technology Transfer)? 		
	<ul style="list-style-type: none"> • Focal area set-aside? 		
Recommendations	8. Is the PIF being recommended for clearance and PPG (if additional amount beyond the norm) justified?	<p>Not at this time. There are a number of issues with the design and eligibility of some of the components of the project. The proponent should re-consider the project components and align them with chemicals covered by the Stockholm Convention.</p> <p>4/9/15 (AS) - Not at this time. The project continues to have a number of un-resolved issues.</p> <p>7/14/2015 (AS) - Please clarify the comments in 1 above</p> <p>9/28/15 (AS) - The proposal is technically cleared by the program manager</p>	
Review Date	Review	March 17, 2015	
	Additional Review (as necessary)	April 09, 2015	

PIF Review			
Review Criteria	Questions	Secretariat Comment	Agency Response
	Additional Review (as necessary)	July 14, 2015	

CEO endorsement Review			
Review Criteria	Questions	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
Project Design and Financing	1. If there are any changes from that presented in the PIF, have justifications been provided?		
	2. Is the project structure/ design appropriate to achieve the expected outcomes and outputs?		
	3. Is the financing adequate and does the project demonstrate a cost-effective approach to meet the project objective?		
	4. Does the project take into account potential major risks, including the consequences of climate change, and describes sufficient risk response measures? (e.g., measures to enhance climate resilience)		
	5. Is co-financing confirmed and evidence provided?		

CEO endorsement Review

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	6. Are relevant tracking tools completed?		
	7. <i>Only for Non-Grant Instrument:</i> Has a reflow calendar been presented?		
	8. Is the project coordinated with other related initiatives and national/regional plans in the country or in the region?		
	9. Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?		
	10. Does the project have descriptions of a knowledge management plan?		
Agency Responses	11. Has the Agency adequately responded to comments at the PIF ³ stage from:		
	• GEFSEC		
	• STAP		
	• GEF Council		
	• Convention Secretariat	Comments from the BRS Secretariat on the PIF: 1. To be eligible to receive funding from the financial mechanism defined under Article 13 of the Stockholm Convention in accordance with a country must be a developing country or a country with	

³ If it is a child project under a program, assess if the components of the child project align with the program criteria set for selection of child projects.

CEO endorsement Review

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		<p>an economy in transition; and a Party to the Convention. Bangladesh became a Party to the Stockholm Convention on the 12 March 2007, and is eligible to receive financial assistance in accordance with paragraph 1(a) of the Annex to decision SC-1/9. It transmitted its initial national implementation plan addressing the first twelve POPs on the 8 May 2009. The country's NIP identifies DDT stockpiles as a priority area.</p> <p>2. One of the project components is waste management, however, it is acknowledged in the project proposal that national capacity for the management of hazardous waste from sectors, including agriculture, will not be developed. Ref. Page 6: "The project will also emphasize the need for national solutions for the management of hazardous waste from all sectors, including agriculture. This project will not aim to develop those solutions, but can catalyze action in the area of hazardous waste management that is otherwise unlikely to advance". This project provides an opportunity to investigate solutions at the national level to Bangladesh's lack of hazardous waste management</p>	

CEO endorsement Review

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		<p>infrastructure. On the basis of the inventories undertaken under this project wouldn't it be possible to forecast future arising and using this information develop business cases for the development of much needed hazardous waste management infrastructure (comment from March 2015)</p> <p>3. Project component 2: Regulation and enforcement could be rephrased to Governance and enforcement and should relate in the project outcome to the ratification and implementation of the Rotterdam Convention.</p> <p>4. In regulating illegal imports of POPs pesticides, the private sector chemical importers could play a key role and therefore more emphasis on their involvement should be considered. While output 2.1.3 focuses on the Customs, the output 4.1.4 and the role of private sector, as elaborated in the Stakeholder section (page 8) pay more emphasis on promoting bio-pesticides and alternatives within awareness and communication on risk and illegal use.</p>	
Recommendation	12. Is CEO endorsement recommended?		
Review Date	Review		
	Additional Review (as necessary)		

CEO endorsement Review

Review Criteria	Questions	Secretariat Comment at CEO Endorsement	Response to Secretariat comments
	Additional Review (as necessary)		