



**GEF-6 GEF SECRETARIAT REVIEW FOR PROGRAMMATIC FRAMEWORK DOCUMENT\*  
THE GEF/LDCF/SCCF TRUST FUNDS**

GEF ID:	<b>9444</b>		
Country/Region:	<b>Regional (Ghana, Kenya, Senegal, Tanzania, Zambia)</b>		
Program Title:	<b>EHPMP - Environmental Health and Pollution Management Program in Africa</b>		
GEF Agency:	<b>World Bank</b>	GEF Agency Project ID:	
Type of Trust Fund:	<b>GEF Trust Fund</b>	GEF Focal Area (s):	<b>Chemicals and Waste</b>
GEF-6 Focal Area/ LDCF/SCCF Objective (s):	<b>CW-2 Program 3; CW-2 Program 4;</b>		
Anticipated Financing PPG:		Program Grant:	<b>\$42,201,845</b>
Co-financing:	<b>\$243,050,000</b>	Total Program Cost:	<b>\$285,251,845</b>
PIF Approval:		Council Approval/Expected:	<b>May 01, 2017</b>
Program Manager:	<b>Ibrahima Sow</b>	Agency Contact Person:	<b>Gayatri Kanungo</b>

<b>Review Criteria</b>	<b>Questions</b>	<b>Secretariat Comments</b>	<b>Agency Response</b>
<b>Program Consistency</b>	1. Is the program aligned with the relevant GEF strategic objectives and results framework? <sup>1</sup>	The overall goal of the project with relation to mercury reduction is too modest for a project of this size, particularly in light of the limited funds available in the overall GEF6 replenishment for mercury. The replenishment aims to reduce 1000 tons of mercury, but the overall allocation of funds for mercury projects is only \$141 M. This implies that projects/programs supported by the GEF must be very cost-effective. However this program would consume \$15 M of the available mercury funds, while aiming to reduce only 50 tons of mercury. The proposal seeks to	

<sup>1</sup> 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)?

		<p>address contaminated ASGM sites in Ghana and Tanzania. GEFSEC excluded mercury contaminated sites from the GEF 6 program strategy as guidance is required from the COP on issues including site identification, human health and environmental risks, and options for managing contaminated sites etc. The intention will be to deal with contaminated sites after the COP develops its guidance on these issues and then guides the GEF on the entry points in addressing contaminated sites.</p> <p>For the mercury components, we recommend the Bank to start with a comprehensive assessment of the ASGM sector in Tanzania and Ghana (i.e: preparation of a National Action Plan) as a basis for any work related to managing mercury in priority sectors.</p>	
<p><b>Program Design</b></p>	<p>2. Is the description of the baseline scenario reliable, and based on sound data and assumptions? Are the activities that will be financed using GEF/LDCF/SCCF funding based on incremental/ additional reasoning?</p>	<p>There appears to be significant duplication of efforts between this program and the recently approved project on the "Integrated Health and Environment Observatories and Legal and Institutional Strengthening for the Sound Management of Chemicals in Africa (African ChemObs)" submitted by UNEP. The ChemObs project proposed to develop a prototype of national integrated health and environment observatory, including a core set of indicators enabling data aggregation, to provide timely and evidence based information to predict, prevent and reduce chemicals risk to human health and the environment. The project include tangible interventions including the</p>	

		<p>development of integrated waste management approaches to chemicals and waste issues at national level with targeted pilot interventions to remove risks in high priority cases from wastes such as POPs, PCB, electronic wastes, flame retardants such as PBDE and related compounds used in the textiles and building products sectors, specific mercury waste issues identified at national level and reduction of risks from recycling of lead acid batteries.</p> <p>Kenya, Tanzania and Zambia are participating in both projects. We recommend WB to carefully review the proposed activities under the ChemOBs project and make sure that the different components in the program are complementary and not duplicative.</p> <p>The e-waste component for Ghana is ill-defined. We expect a detailed description of activities and clarification of the roles and responsibilities of different actors, including the informal sector to support the sound management of e-waste. Also note that for this component, the co-financing is too low and not acceptable. For Tanzania and Kenya, the activities described to support the investments in solid waste dumpsites are not GEF eligible.</p> <p>The types of activities that the GEF could support are activities that could achieve reduction of unintentional POPs (uPOPs) by better preventing UPOPs precursors such as plastic wastes mixed with the municipal and organic wastes that are subject to open burning and consequently</p>	
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		<p>causing higher emissions of uPOPs. The spontaneous combustion will be also better controlled by improving uncontrolled dump sites through separation, segregation, recycling of municipal and hazardous waste which should be the primarily responsibility of local governments. In this regard, the project has to identify clearly relevant partners such as private companies specialized in waste management, NGOs, etc. and develop a business model that would ensure the capitalization of waste management experiences and sustainability of the accumulated knowledge.</p> <p>Following comments received from STAP and Council members including Canada, Germany, Switzerland and US, The GEF Council requested the project to be resubmitted for the October work program after all comments are addressed. A comprehensive review has been undertaken by the Bank Team and a revised PFD addressing those comments has been resubmitted.</p>	
	<p>3. Is the program framework (Table B) sound and sufficiently clear and appropriate to achieve program objectives and the GEBs?</p>	<p>Please note that the project objectives as described under table B are not relevant for the Child projects for Ghana, Zambia and Tanzania and need to be corrected.</p>	
	<p>4. Are socio-economic aspects, including relevant gender elements, indigenous people, and CSOs considered?</p>		
	<p>5. Does the program take into account potential major risks,</p>		

	including the consequences of climate change, and describes sufficient risk response measures? (e.g., measures to enhance climate resilience)		
	6. If there is a non-grant instrument in the program, is the GEF Agency(ies) capable of managing it?		
	7. Is the program coordinated with other related initiatives and national/regional plans in the country or in the region?		
	8. Is the program implementation/ execution arrangement adequate?		
	9. Does the program include a budgeted M&E Plan that monitors and measures results with indicators and targets?		
	10. Does the program have description of knowledge management plan?		
<b>Resource Availability</b>	11. Is the proposed Grant (including the Agency fee) within the resources available from (mark all that apply):		
	• the STAR allocation?		
	• the focal area allocation?		
	• the LDCF under the principle of equitable access?		
	• the SCCF (Adaptation or Technology Transfer)?		
• focal area set-aside?			
<b>Secretariat Recommendation</b>			
<b>PFD</b>	<b>Is the PFD recommended for clearance to include in the work program?</b>	Not at this time. Please address comments above. 19 April 2016	

<b>Clearance</b>		<p>Please address the following comments:</p> <ul style="list-style-type: none"> <li>- We note intersecting and overlapping projects, with overlapping countries in the Africa region looking at waste of various sources in GEF 6 – i.e. BOAD project (PMIS # 9371) the UNIDO project on e-waste in West Africa (PMIS # 9438), the UNDP/Kenya project (PMIS # 9109), the UNDP healthcare waste project (PMIS # 9428) -. The Bank is requested to undertake a comprehensive review of all these projects, coordinate with the relevant Agencies and revise accordingly the PFD with the view to avoiding duplication of efforts in the same countries.</li> <li>- Ghana: Please clarify to what extent the Ghana Local Capacity Support Project and the Urban Water Project are precisely correlated to the e-waste component?</li> </ul> <p>25 April 2016. All comments have been addressed. PM recommends CEO clearance of the PFD. Inclusion in upcoming work programs is pending availability of resources. During the development of the child projects, we request the Bank to provide an explanation on the project cost-effectiveness related to the reduction of POPs.</p> <p>30 August 2016 The project has not been approved by Council at the June work program following several comments received</p>	
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		<p>from STAP and Council members including Canada, Germany, Switzerland and US. Council requested the project to be resubmitted for the October work program after all comments are addressed.</p> <p>A comprehensive review has been undertaken by the Bank Team and a revised PFD addressing those comments has been resubmitted.</p> <p>PM recommends CEO clearance of the revised PFD for inclusion in October WP pending availability of resources.</p> <p>22 March 2017</p> <p>The PFD was not considered for inclusion in the October WP due to lack of sufficient resources and is now being proposed for inclusion in the May 2017 WP.</p>	
<b>Review Date (s)</b>	Review*	August 20, 2015	
	Additional Review (as necessary)	April 19, 2016	
	Additional Review (as necessary)	August 30, 2016	

**\* This is the first time the Program Manager provides full comments for the program. Subsequent follow-up reviews should be recorded. For specific comments for each section, please insert a date after comments.**