



# REQUEST FOR CHEMICALS AND WASTES ENABLING ACTIVITY

## PROPOSAL FOR FUNDING UNDER THE GEF Trust Fund

### PART I: PROJECT IDENTIFIERS

Project Title:	Strengthen national decision making towards ratification of the Minamata Convention and build capacity towards implementation of future provisions.		
Country(ies):	Seychelles	GEF Project ID: <sup>1</sup>	6961
GEF Agency(ies):	UNDP (select)	GEF Agency Project ID:	5483
Other Executing Partner(s):	Ministry of Environment and Energy	Submission Date:	12 Aug 2014
GEF Focal Area (s):	Chemicals and Wastes	Project Duration (Months)	24
Type of Report:	National Action Plan (NAP)	Expected Report Submission to Convention	2017

### A. PROJECT FRAMEWORK\*

<b>Project Objective: Undertake a Mercury Initial Assessment (MIA) to enable the Government of Seychelles to determine the national requirements and needs for the ratification of the Minamata Convention and establish a national foundation to undertake future work towards the implementation of the Convention</b>				
Project Component	Project Outcomes	Project Outputs	(in \$)	
			GEF Project Financing	Confirmed Co-financing <sup>2</sup>
1. To create an enabling environment for decision-making on the ratification of the Minamata Convention.	1.1 Policy and regulatory framework, and institutional capacity needs in regard to the implementation of the Convention's provisions assessed	1.1 Assessment report prepared on the existing and required policy and regulatory framework as well as institutional capacity to implement the Convention (incl. overview of existing barriers).	61,000	20,000
	1.2 Awareness raised on the environmental and health impacts of Mercury.	1.2 Hg awareness raising activities conducted targeting decision makers and population groups at risk.		
2. National Mercury Profile and Mercury Initial Assessment Report developed.	2.1 National capacity built to undertake Mercury inventories.	2.1 Capacity building and training conducted to commence the Mercury inventory.	120,000	5,000
	2.2 National Mercury Profile available.	2.2 Mercury Inventory conducted.		
	2.3 National MIA Report available.	2.3 National MIA Report for the ratification and implementation of the Convention prepared (including proposed policy/regulatory interventions, inst. cap. building and required		

<sup>1</sup> Project ID number will be assigned by GEFSEC and to be entered by Agency in subsequent document submission.

<sup>2</sup> Co-financing for enabling activity is encouraged but not required.

		investment plans.		
Subtotal			181,000	25,000
Project Management Cost <sup>3</sup>			18,100	
<b>Total Project Cost</b>			<b>199,100</b>	<b>25,000</b>

\* List the \$ by project components. Please attach a detailed project budget table that supports all the project components in this table.

## B. SOURCE OF CO-FINANCING FOR THE PROJECT BY NAME AND BY TYPE

Sources of Co-financing	Name of Co-financier	Type of Co-financing	Amount (\$)
Recipient Government	Govt. of Seychelles	In-kind	20,000
GEF Agency	UNDP	In-kind	5,000
(select)		(select)	
(select)		(select)	
(select)		(select)	
(select)		(select)	
(select)		(select)	
(select)		(select)	
<b>Total Co-financing</b>			<b>25,000</b>

<sup>3</sup> This is the cost associated with the unit executing the project on the ground and could be financed out of trust fund or co-financing sources. For EAs within the ceiling, PMC could be up to 10% of the Subtotal GEF Project Financing.

### C. GEF FINANCING RESOURCES REQUESTED BY AGENCY, COUNTRY AND PROGRAMMING OF FUNDS

GEF Agency	Trust Fund	Country Name/Global	Programming of Funds	(in \$)		
				GEF Project Financing (a)	Agency Fee <sup>a)</sup> / (b) <sup>2</sup>	Total c=a+b
UNDP	GEF TF	Seychelles <input checked="" type="checkbox"/>	Cross-Cutting Capacity	199,100	18,915	218,015
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
(select)	(select)	<input type="checkbox"/>	(select as applicable)			0
<b>Total Grant Resources</b>				199,100	18,915	218,015

a) Refer to the [Fee Policy for GEF Partner Agencies](#)

### PART II: ENABLING ACTIVITY JUSTIFICATION

**A. ENABLING ACTIVITY BACKGROUND AND CONTEXT**

(Provide brief information about projects implemented since a country became party to the convention and results achieved):

Seychelles signed the Minamata Convention on Mercury as recently as May 27th 2014, becoming the 98th signatory to the convention.

Seychelles has been undertaking a Child development study since the 1980s to evaluate the effects of prenatal methyl mercury exposure in babies born to mothers with high consumption of fish in their diet; fish consumption and low level mercury exposure on the development of children even before they are born. Although research is ongoing researchers have no evidence of abnormal or delayed development in children as a result of their mother's consumption of fish during pregnancy. So far the data do not support the hypothesis that there is a neurodevelopmental risk from prenatal methyl mercury exposure resulting solely from ocean fish consumption.

The Seychellois population however consumes mostly demersal fishes, which apparently accumulate lower levels of mercury than larger open ocean predators such as swordfish. As concern grows about the sustainability of the demersal fisheries, people are being encouraged to consume more abundant pelagic species, such as swordfish and tuna.

Concentrations of methyl-mercury above the standard set by the European Union (EU) was detected in swordfish from the Seychelles earlier this year. This resulted in a temporary ban of imports of fish from the Seychelles. As swordfish makes up about 50% of catches in the local long-line fishery sector, the lack of a market for this species caused a temporary collapse of this sector. In turn, this resulted in long liners redirecting their fishing effort to the demersal fishery sector, which was already at risk of over-exploitation. As these long-liners are using highly effective practices their entrance into the demersal fishery raised serious concern about sustainability.

Seychelles has also ratified the Stockholm Convention in 2007 which states that Parties to the Convention must concentrate their efforts on managing the 21 POPs listed under the Convention including putting into place regulatory measures, undertaking comprehensive assessments of the presence of POPs.

Seychelles has received support for drafting its initial National Implementation Plan on POPs (2007) and is currently in the process of revising and updating its NIP with support from the GEF and UNIDO (2013).

The GEF-SGP is currently supporting the Lions Club in building capacities of the Public Utilities Corporation and the Customs division through sensitization and training for identification, labeling and testing of PCB related material and to help control import and export of such substances in the respective departments.

Seychelles is also participating in the regional UNEP project "Disposal of PCB Oils Contained in Transformers

	and Disposal of Capacitors Containing PCB in Southern Africa
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<p><b>B. ENABLING ACTIVITY GOALS, OBJECTIVES, AND ACTIVITIES</b> (The proposal should briefly justify and describe the project framework. Identify also key stakeholders involved in the project including the private sector, civil society organizations, local and indigenous communities, and their respective roles, as applicable. Describe also how the gender dimensions are considered in project design and implementation):</p>	<p>The proposed EA and the project framework, including envisaged activities, are entirely in line with the GEF Initial Guidelines for Enabling Activities for the Minamata Convention on Mercury (GEF/C.45/Inf.05).</p> <p>The project's objective is to undertake a Mercury Initial Assessment to enable the Government of the Republic of Seychelles to determine the national requirements and needs for the ratification of the Minamata Convention and establish a sound foundation to undertake future work towards the implementation of the Convention.</p> <p>As per the GEF Initial Guidelines (GEF/C.45/Inf.05) the Minamata Convention Initial Assessment for Seychelles will contain the following components:</p> <p>a) Undertake an assessment of legislation and policies in regard to the implementation of the following Convention provisions: The policy and legislative assessment will be undertaken through a review of existing legislation on chemicals management and identification of the gaps prevalent in association to issues of mercury.</p> <p>b) Undertake a detailed Mercury Initial Assessment in the following categories:</p> <ul style="list-style-type: none"> <li>•Stocks of mercury and/or mercury compounds and import and export procedures including an assessment of the storage conditions;</li> <li>•Occurrence of mercury in local industrial processes and the source of supply of mercury, and its occurrence in waste streams;</li> <li>•Sectors that may use mercury and the amount per year, including manufacturing processes, ASGM and mercury added products;</li> <li>•Trade in mercury and mercury containing compounds.</li> <li>•Assessment of mercury levels in fish for export (swordfish).</li> </ul> <p>c) Identify:</p> <ul style="list-style-type: none"> <li>•Emission sources of mercury;</li> <li>•Release sources of mercury to land and water.</li> </ul> <p>d) Assess institutional and capacity needs to implement the Convention. Institutional capacity of governmental institutions and agencies will be assessed to determine the capacity needs and gaps that exist for the implementation of the Convention and propose interventions to strengthen these institutions and capacities. The assessment will also review the systems needed to report to the Convention under article 21.</p>
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	<p>The institutional capacity gaps identified and the findings of the legislation and policy review will be used to formulate a number of priority actions, which will be included in the Mercury Initial Assessment Report. Proposed actions will be discussed and agreed upon among the key stakeholders mentioned in section B through several rounds of discussions.</p> <p>The project's key stakeholders are identified as follows:</p> <p>Key Government Institutions (among else):</p> <ul style="list-style-type: none"> <li>- Ministry of Environment and Energy (MEE): Ensure overall coordination at national level in support of the Minamata Convention, in particular: Setting of national targets; Support the Mercury inventory; Monitoring levels of contamination in environmental matrices and quantity of Mercury in products; Coordination with partners such as the Ministry of Health for achievement of the major objectives related to mercury phase-out; Oversee the environmentally sound disposal of waste products and materials resulting from phase-out efforts; Put into place interim and permanent measures for ensuring implementation of the Minamata Convention.</li> <li>- Ministry of Health (MH): Coordinate the project components that relate to the use of Mercury in the health sector, advocate for the phase-out of Mercury containing devices where cost-effective alternatives exist and provide advice and guidance on best practices for Mercury management in the health sector.</li> </ul> <p>Oversee any project component, which involves human subjects; screen projects for ethical standards and provide advise on avenues for further exploration. Ensure the necessary linkages between future research on Mercury and heavy metals and the ongoing Child Development Study.</p> <ul style="list-style-type: none"> <li>- Ministry of Natural Resources: • Oversee the work of the SFA (see below) and the SAA (see below) as the parent Ministry of both institutions. • Set policy guidelines and liaise with MEE to meet Minamata Convention Objectives.</li> <li>- Seychelles Fishing Authority: Monitoring the levels of methyl mercury in swordfish and identifying risks and sources linked to high mercury levels, in collaboration with the Fishermen and Boat Owners Association (FBOA), Institut de Recherche pour Développement (IRD) and Université de La Rochelle. Furthermore, coordinate and lead the project component on mercury monitoring in swordfish, including the programme's design (swordfish sampling program, laboratory tests, data analysis and preparation of technical report) through collaboration with its partners.</li> <li>- Seychelles Agricultural Agency (SAA): • Responsible for conducting inspections and certifying of fish Exports. • Collaborate with local entities in the identification of areas where intervention is necessary within the agricultural</li> </ul>
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	<p>sector and support recommended actions through its network of technicians, extension officers and facilities.</p> <ul style="list-style-type: none"> <li>- Seychelles Bureau of Standards (SBS): Verification and guidance on sampling methods; Provision of sampling materials; Conditioning and preservation of samples and coordination with external labs; Run tests for various matrices on behalf of the MEE for all entities participating in the project.</li> <li>- Fishers and Boat Owners Association (FBOA): Work in collaboration with IRD and SFA on identifying mercury in fish species. Provide access to swordfish for sampling, collaborate in the sampling program and provide inputs to the technical reports.</li> <li>- Institut de recherché de la Reunion (IRD): Design and collaborate in the design and implementation of the swordfish sampling program, data analysis and preparation of technical report.</li> <li>- Université de La Rochelle: Provide laboratory facilities and train SFA staff to undertake tests/analysis in accordance with EU standards.</li> </ul> <p>In addition,</p> <ul style="list-style-type: none"> <li>- Secondary and Tertiary Education Institutions (such as UNISEY): Involved in key research programmes on mercury and mercury waste management.</li> <li>-Private Sector: Involved in various important aspects of the proposed project: Private and parastatal companies/industries responsible for the release of Mercury and production of mercury containing wastes; Private medical facilities making use of mercury containing devices; Service providers involved in waste collection, disposal and treatment; Distributors and retailers of Mercury containing and Mercury-free consumer products; Laboratories for testing and certification; etc.</li> <li>-Civil Society Organizations and Non-Governmental Organizations (CSOs/NGOs): Will be engaged in the project to help required and important information (e.g. on the environmental and health aspects and concerns of mercury releases and accumulation in the environment) reach local communities at risk, the general public and decision makers.</li> </ul> <p><b>Gender Dimensions</b></p> <p>Generally, two groups are more at risk for the effects of mercury. Foetuses and people who are regularly exposed (chronic exposure) to high levels of mercury (such as populations that rely on subsistence fishing or people who are occupationally exposed or exposed through use of cosmetics). As mercury is passed on from mother to child, and foetuses and children are most susceptible to developmental effects from mercury, the MIA will pay particular attention to assessing national capacity to keep such risk groups safe. Recommendations on how to</p>
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	improve gender dimensions and gender mainstreaming related to mercury, and priorities actions in this area will be highlighted in the project document and the MIA report.
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<p><b>C. DESCRIBE THE ENABLING ACTIVITY AND INSTITUTIONAL FRAMEWORK FOR PROJECT IMPLEMENTATION</b> (discuss the work intended to be undertaken and the output expected from each activity as outlined in Table A ).</p>	<p>This project will be implemented via the UNDP National Implementation Modality (NIM). The Ministry of Environment and Energy (MEE) will be responsible for the implementation of the project.</p> <p>The proposed EA project has been organized into two components:</p> <ol style="list-style-type: none"> <li>1. Creation of an enabling environment for decision-making on the ratification of Minamata.</li> <li>2. Development of the National Mercury Profile and Mercury Initial Assessment Report.</li> </ol> <p>1.1 Conducting an assessment of the policy and regulatory framework and institutional capacity needs in regard to the implementation of the Convention's provisions.</p> <ul style="list-style-type: none"> <li>- The work will begin with a review of the structures, institutions and policies and regulations already in place: Legislation on the governance of chemicals in general and the capacities of the key institutions will be the initial focus.</li> <li>- Review of existing legislation and identification of gaps for meeting the Minamata Convention requirements and initial technical input on proposed amendments.</li> <li>- Roles of ministries and institutions related to the key sectors where the mercury inventory might establish the presence of mercury use, emissions and/or releases are to be analyzed. These institutions will include, but not be limited to the Ministries responsible for the issues related to Health, Economy, Environment, Agriculture and Fisheries, Energy and Waste Management.</li> <li>- Capacities of these institutions will be reviewed and the gaps for comprehensive management of mercury issues will be identified.</li> <li>- Identification of barriers that would hinder or prevent implementation of the Convention will be identified and recommendations will be made on how to remove such barriers.</li> </ul> <p>Upon the identification of capacity and/or regulatory gaps (in relation to the Convention's obligations), these will be discussed and reviewed by the project's stakeholders. The results of these discussions will direct the work under component 2, in particular related to the development of the MIA Report.</p> <p>1.2 Raising awareness on the environmental and health impacts of mercury</p> <p>An awareness raising plan will be developed to conduct awareness raising among the larger public on the human health and environmental effects of mercury and mercury compounds and conduct awareness on the proper management of mercury containing products and wastes (e.g thermometers, CFL's tubes, batteries).</p>
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	<p>Specifically, some targeted actions will be undertaken through preventive programmes on occupational exposure to mercury and its compounds (Article 16) and provision to the public of available information on health effects of mercury and its compounds. Awareness raising will target decision makers, the general public and population groups at risk.</p> <p>2.1 Building national capacity to undertake the Mercury Inventory. National capacity to undertake the Mercury Inventory will be built through training, which will be conducted and facilitated by the project's international technical advisor. Training will be provided on data collection methodologies, reliability, credibility, data analysis, etc.</p> <p>Training will be targeted towards a group of national technical experts who will conduct and develop the National Mercury Profile. Training will also be targeted towards key government representatives and other national project stakeholders who need sufficient knowledge about conducting a Mercury Inventory to be able to review it and comment on it.</p> <p>2.2 Conducting the Mercury Inventory and prepare the National Mercury Profile. The inventory will make use of the UNEP "Toolkit for identification and quantification of mercury releases", which is intended to assist countries to develop a national mercury releases inventory. It provides a standardized methodology and accompanying database enabling the development of consistent national and regional mercury inventories.</p> <p>Throughout the data collection, analysis and preparation of the Mercury Inventory, the national expert team will be guided by an international technical advisor. At the beginning of the assignment, the methodology and work programme for carrying out the inventory will be submitted to the Steering Committee* and agreed upon. In addition, the experts will formally present their reports to the Steering Committee for comments, views and approval during the period of the assignment.</p> <p>They will be required to carry out an inventory of mercury-containing wastes in Seychelles in accordance with the UNEP Inventory Level 2 methodology. The experts are expected to conduct desk studies, thorough quantitative and qualitative surveys and field audits of the activities generating mercury-containing wastes in Seychelles, in number and nature in compliance with statistical norms in order to:</p>
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	<p>a) Identify and assess the amounts of emission sources of mercury and release sources of Mercury to land and water. This will include the identification of activities generating mercury-containing wastes in Seychelles.</p> <p>b) Collect, compile data and prepare an inventory of the sources, types, quantities and physical states of mercury-containing wastes generated, stored and recycled, treated or disposed of in Seychelles. This will include the identification of old, historical sources of Mercury contamination (such as abandoned waste dumping sites).</p> <p>c) Assess current levels of handling, storage and management practices for mercury-containing wastes.</p> <p>d) Identify key sectors, local authorities, communities and other stakeholders affected by or involved with important Mercury sources and/or emissions.</p> <p>e) Identify opportunities and propose measures for the minimisation, recycling, pre-treatment and disposal of mercury containing wastes.</p> <p>After completion of the data gathering stage, a National Mercury Profile, including significant sources of emissions and releases, as well as inventories of Mercury and Mercury compounds, will be prepared for review, approval and adoption by national stakeholders during a validation workshop.</p> <p><b>2.3 Preparing the National MIA Report</b> Following the finalization of the project activities as envisaged under component 1 (1.1 – 1.2) as well as completion of the project activities 2.1 and 2.2 (see above), the national project team will prepare a National MIA Report.</p> <p><b>*Project Steering Committee (PSC):</b> The PSC will provide high-level policy guidance and orientation to the Implementation of the Project (Strengthen national decision making towards ratification of the Minamata Convention and build capacity towards implementation of future provisions).</p> <p>The PSC will be composed of the project’s principal stakeholders and decision-makers, ensuring a balanced and effective composition. All the necessary preparations for its effective functioning (preparation of Workplans, Budgets, Progress Reports, etc.) will be handled by the Programme Coordinator based at the Programme Coordinating Unit who will act as secretary of the Steering Committee.</p> <p>The Ministry of Environment will chair the PSC, and the UNDP-GEF Programme Coordinator will serve as Secretary. The PSC will consist of (10) voting members from the following organizations (Listed below) including UNDP. Other members may be co-opted for regular or</p>
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	<p>extra-ordinary meetings/sessions, according to the need. The preferred mode of reaching a decision within the Committee is by consensus.</p> <p>No members of the PSC will be remunerated from project funds. Government may wish to remunerate members but will do so at its own costs.</p> <p>Membership (Proposed):</p> <ol style="list-style-type: none"> <li>1. Ministry of Environment and Energy</li> <li>2. Ministry of Natural Resources</li> <li>3. Seychelles Fishing Authority</li> <li>4. Ministry of Health</li> <li>5. Seychelles Bureau of Standards</li> <li>6. Fishers and Boat Owners Association</li> <li>7. Seychelles Agricultural Agency</li> <li>8. UNDP</li> <li>9. GEF-SGP</li> <li>10. Programme Coordinating Unit</li> <li>11. IRD/Universite de la Rochelle (observers)</li> </ol> <p>Tasks / duties:</p> <p>The Project Steering Committee will meet quarterly to:</p> <ol style="list-style-type: none"> <li>a. Provide high level orientation and guidance for the project (institutional, political and operational)</li> <li>b. Ensure that the project develops in accordance within the agreed framework (Project Document, Annual Workplans) and achieves its targets (outputs, outcomes and objectives).</li> <li>c. Approve annual progress reports, workplans and budgets;</li> <li>d. Approve TORs for Consultants and any (sub-)Committees or working groups required;</li> <li>e. Nominate 2 – 3 members from the Steering Committee to sit on a Tender Evaluation Committee for major tenders (together with UNDP-GEF Programme Coordinator and UNDP Country Programme Officer);</li> <li>f. Endorse the recommendation of the Tender Evaluation Committee;</li> <li>g. Perform Monitoring &amp; Evaluation of the Project;</li> <li>h. Ensure collaboration between implementing institutions.</li> <li>i. Pay special attention to the sustainability of activities developed by the project.</li> <li>j. Ensure the integration and coordination of project activities with other related government and donor-funded initiatives.</li> <li>k. Contribute to the preparation of the Annual Reports required under the Project.</li> </ol>
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<b>D. DESCRIBE, IF POSSIBLE, THE EXPECTED <u>COST-EFFECTIVENESS</u> OF THE PROJECT:</b>	<p>The cost-effectiveness of the project will be assured by combining the management of the project with shared resources from other POPs- and chemicals-related projects being implemented by UNDP in Seychelles</p> <p>The project will as much as possible engage national experts to facilitate the collection of accurate information and to establish a high-responsiveness of the project to keep a steady momentum in project implementation with an international technical advisor providing succinct, specific input where local expertise gaps exist.</p> <p>Finally, the MIA project in Seychelles will work closely together with the MIA project in Mauritius, which are both managed out of the UNDP Country Office based in Mauritius, allowing economies of scale, exchanges of lessons-learned and opportunities to use the same consultants (national and international).</p>
<b>E. DESCRIBE THE BUDGETED M&amp;E PLAN:</b>	Project monitoring and evaluation will be conducted in accordance with established UNDP and GEF procedures and will be provided by the project team and the UNDP Country Office (UNDP-CO) with support from the UNDP/GEF Regional Coordination Unit. M&E requirements will be specified in detail in the UNDP project document.
<b>F. EXPLAIN THE DEVIATIONS FROM TYPICAL COST RANGES (WHERE APPLICABLE):</b>	N/A

**PART III: APPROVAL/ENDORSEMENT BY GEF OPERATIONAL FOCAL POINT(S) AND GEF AGENCY(IES)**

- A. RECORD OF ENDORSEMENT OF GEF OPERATIONAL FOCAL POINT(S) ON BEHALF OF THE GOVERNMENT(S):**  
(Please attach the [\*Operational Focal Point endorsement letter\(s\)\*](#) with this template).


NAME	POSITION	MINISTRY	DATE <i>a(Month, day, year)</i>
Mr. Didier Dogley	GEF OFP	<b>MINISTRY OF ENVIRONMENT AND ENERGY</b>	<b>08/01/2014</b>

**B. CONVENTION PARTICIPATION**

CONVENTION	DATE OF RATIFICATION/ ACCESSION (mm/dd/yyyy)	NATIONAL FOCAL POINT
UNCBD		
UNFCCC		
UNCCD		
STOCKHOLM CONVENTION	<b>03/06/2008</b>	<b>MR. FLAVIEN PHILOMEL JOUBERT</b>

	<b>DATE SIGNED (MM/DD/YYYY)</b>	<b>NATIONAL FOCAL POINT</b>	<b>DATE OF NOTIFICATION UNDER ARTICLE 7 TO THE MINAMATA CONVENTION SECRETARIAT</b>
MINAMATA CONVENTION	<b>05/01/2014</b>	<b>Ms. JUDE FLORENTINE</b>	

### C. GEF AGENCY(IES) CERTIFICATION

<b>This request has been prepared in accordance with GEF policies<sup>4</sup> and procedures and meets the standards of the GEF Project Review Criteria for (select) Enabling Activity approval in GEF 6.</b>					
Agency Coordinator, Agency name	Signature	Date (Month, day, year)	Project Contact Person	Telephone	E-mail Address
Adriana Dinu, UNDP – GEF Executive Coordinator and Director a.i		8/12/2014	Mr. Jacques Van Engel Officer-in- Charge UNDP MPU/Chemicals	212-906- 5782	jacques.van.engel@undp.org

<sup>4</sup> GEF policies encompass all managed trust funds, namely: GEFTF, UN5CF, and SCCF