



UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION

PROJECT DOCUMENT

Project of the Governments of Ghana and Nigeria (Regional)

Project number:	GF/RAF/07/XXX
Project title:	Regional project to develop appropriate strategies for identifying sites contaminated by chemicals listed in Annexes A, B and/or C of the Stockholm Convention
GEFSEC Project ID:	2720
Thematic area code:	B16
Starting date:	September 2007
Duration:	4 years
Project site:	Ghana/Nigeria
Government Co-ordinating agency:	
Counterpart: Executing agency/ cooperating agency/	Ministry of Environment and Science, Accra, Ghana Federal Ministry of Environment, Abuja, Nigeria Regional Industrial Development Office in Abuja (UNIDO)
Project Inputs: GEF UNIDO inputs:	US\$ 2,650,000 (including PDF-B of US\$ 650,000) US\$ 200,000 (in-kind) US\$ 100,000 (in cash)
Counterpart inputs: - Govt. of Ghana: - Govt. of Nigeria: - Other Donors: GRC DANIDA, CIDA, mining industries in Ghana, GTZ, Germany, ECOWAS, etc.	US\$ 250,000 (in-kind) US\$ 250,000 (in-kind) US\$ 900,000 (in cash) US\$ 250,000 (in-kind) US\$ 150,000 (in kind)
Grand Total:	US\$ 4,750,000
Support costs (10%):	US\$ 265,000

BRIEF DESCRIPTION

The objective of the proposed project is to build capacity in Ghana and Nigeria to develop strategies to identify land/sites contaminated with persistent organic pollutants (POPs) as implicated in the Stockholm Convention. It deals with barrier removal in the areas of intervention with policy/legal framework, enforcement, capacity building in the region to develop systematic approach in identification of lands/sites contaminated with POPs, to collect information, develop and manage an Information Management System (IMS) on contaminated sites, social economic indicators affecting human health and the environment due to POPs and other persistent toxic substances (PTS) exposures from contaminated land and other sources, to identify, monitor and analyse samples from

POPs contaminated lands, set up model experiments to develop appropriate environmentally and economically acceptable remediation technologies for POPs contaminated land/sites based on risk assessment involving all relevant stakeholders. The project is based on the countries' National Implementation Plans (NIPs) to demonstrate how they will be able to implement the obligations under the Stockholm Convention. The participating countries will build up capacity in the region to identify and prioritize POPs contaminated sites and develop suitable technologies for land remediation in accordance with best available techniques and best environmental practices (BAT/BEP). The project is closely linked to Article 6 Section 1(e) of the Stockholm Convention, which states that Parties shall "endeavour to develop appropriate strategies for identifying sites contaminated by chemicals listed in Annex A, B or C, if remediation of those sites is undertaken, it shall be performed in an environmentally sound manner". The project will be implemented through National Coordinator Units set up in Ghana and Nigeria under the supervision of a Regional Coordination Unit (RCU) set up in the UNIDO Regional Development Office, Abuja, Nigeria. Based on the project objectives, the following outputs will be achieved:

- i. Establishment of an organizational set up to implement and monitor the progress of the project.
- ii. Establishment of regional policy and national legal framework for the management of contaminated sites.
- iii. Establishment of national and regional capacity building and institutional strengthening including risk assessment/management.
- iv. A toolkit for selection of environmentally sound and economically feasible remediation technologies in Ghana and Nigeria.
- v. Establishment of IMS and Framework for Stakeholders and Public Education Awareness Programme.
- vi. Regional Monitoring and Evaluation Plan.

The proposed project will bring out toolkit for the systematic identification of sites contaminated by POPs and methodologies to be adopted in the region for the decontamination of the contaminated sites that could eventually benefit the whole Africa region and beyond. Though the proposed project is limited to the identification of sites contaminated by POPs chemicals listed under Annex A, B or C of the Stockholm Convention, the methodology established through this project could be modified for the identification of sites contaminated by other chemicals.

The GeoEnvironmental Research Centre (GRC) located in Cardiff University, UK with long standing experience in industrial and agricultural land remediation will cooperate as a technical partner making available its expertise and technical facilities during the implementation of the project. The project takes into account sustainability and reproductibility and above all incorporates regional context for future outreach activities. Lessons learned and experience gained will be useful in systematic identification of POPs contaminated lands, risk assessment/prioritization and application of appropriate remediation technology.

<u>Approved</u> :	Signature:	Date:	Name and title:
On behalf of:			
Government of Ghana			
Government of Nigeria			
UNIDO			

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LIST OF SELECTED ACRONYMS AND ABBREVIATIONS

ASP	Africa Stockpiles Programme
BAT	Best available techniques
BEP	Best environmental practices
CBOs	Community Based Organizations
CEA	Country Environment Analysis
CIDA	Canadian International Development Agency
CLR	Contaminated Land Report
CTA	Chief Technical Advisor
DANIDA	Danish International Aid Agency
DFID	Department for International Development
DPR	Department of Petroleum Resources
EA	Executing Agency
EIA	Environmental impact assessment
EHF	Environmental Health Fund
EPA	Environmental Protection Agency
ESEID	Environmentally Sustainable Economic and Industrial Development
EU	European Union
FAO	Food and Agricultural Organization of the United Nations
FMENV	Federal Ministry of Environment
FML&P	Federal Ministry of Labour and Productivity
FOTE	Friends of the Environment
GC	Geoenvironmental Centre
GC-ECD	Gas chromatograph – Electron capture detector
GCLME	Guinea Current Large Marine Ecosystem
GEF	Global Environment Facility
GHS	Global Harmonised Labelling System
GRC	Geoenvironmental Research Centre
HCB	Hexachlorobenzene
HCH	Hexachlorocyclohexane
HPLC	High Pressure Liquid Chromatography
HR GCMS	High Resolution Gas Chromatography
IA	Implementing Agency
IAEA	International Atomic Energy Agency
IC	Incremental cost
ICP	Inductively coupled plasma
IFCS	Intergovernmental Forum on Chemical Safety
IMS	Information Management System
INC	Intergovernmental Negotiating Committee
IOMC	Intergovernmental Organization for the Sound Management of Chemicals
IPEN	International Pesticides Elimination Network
IPEP	International Pesticide Elimination Project
LRTAP	Long Range Transport of Environmental Pollutants
MDG	Millennium Development Goals
MEAs	Multilateral Environmental Agreements
MoU	Memorandum of Understanding
NACWC	National Authority on Chemical Weapons Convention
NAFDAC	The National Agency for Food and Drug Administration and Control
NCS	National Classification System
NES	Nigerian Environmental Society
NEST	Nigerian Study Team
NGO	Non-governmental Organization
NIP	National Implementation Plan
NPA	Nigerian Ports Authority
NPD	National Project Coordinator
OP	Operational Programme
OSPAR	Oslo-Paris Accord

Polyaromatic hydrocarbons
Polybrominated diphenylethers
Programme Coordinator
Polychlorinated biphenyl
Polychlorinated dibenzo-p-dioxin
Polychlorinated dibenzofurans
Pentachlorophenol
Project Development Facility
Persistent organic pollutants
Private-Private Partnership
Plant Protection and Regulatory Services Department
Project Steering Committee
Persistent toxic substances
Risk Based Decision Making
Regional Coordination Unit
Research and Development
Regeneration of European Sites in Cities and Urban Environment
Resource Industrial Development Centre
Resource Integrated Development Foundation
Regional Industrial Development Office
Regional Ministerial Committee
Regional Programme Coordinator Unit
Regional Steering Committee
Strategic Approaches for International Chemicals Management
Sustainable Urban Environment
Toxic equivalent
Terminal Evaluation Report
United Nations Development Programme
United Nations Economic Commission for Europe
United Nations Environment Programme
United Nations Industrial Development Organization
UNIDO Regional Industrial Development Office
The World Bank

SECTION A. CONTEXT

A.1 Context/history

- 1. The post war period made a big leap in the evolution of chemical and allied industries in that mankind has become very much dependent on chemicals not only for its very basic standard of living but also in keeping a high standard of living. While mankind owes its survival to the use of chemicals in agriculture, public health and control of ailments and diseases, one of the major problems facing the global planet is the innumerable number and vast amounts of chemicals that have been produced, used, stored and disposed of over almost half a century. Many of these chemicals used in the past, understandably, have been used, probably within the law, but without all the information on their long-term persistence, mobility in the environment and their ability to bioaccumulate causing toxic effects. The consequent after effect is that it has left certain persistent toxic residual chemicals, especially the so called 'dirty dozen' implicated in the Stockholm Convention, in the environment that they not only get transported from one matrix to another but also tend to move up the food chain and bioaccumulated in humans, other mammals, avian species, wildlife, etc. In the process with proven chronic toxicity they can interfere at three levels of biodiversity through generic level; population species level and community/ecosystem level.
- 2. While most of the developing countries and the countries with economies in transition banned agricultural and industrial persistent organic pollutants (POPs) decades ago, they are burdened with obsolete stocks of POPs pesticides lying in unattended warehouses, buried underneath the ground without proper records, protective and monitoring measures, and PCBs contaminated and leaking electrical equipment. In addition, there is practically no knowledge/information to the public at large regarding the release of unintentionally produced highly toxic by-products namely dioxins and furans as well as hexachlorobenzene (HCB) and polychlorinated biphenyls (PCBs) from various industrial and non-industrial categories specified in Annex C, Article 5 of the Stockholm Convention. The World Bank, GEF and other bilateral donors have been actively engaged in helping African countries under the Africa Stockpiles Programme (ASP) in getting rid of obsolete stocks of POPs pesticides and capacity building in avoiding future accumulation of stockpiles of obsolete pesticides.
- 3. However, many countries in Africa such as Ghana and Nigeria recognize the problem of sustainability that ongoing POPs project would face where they deal only with the problem of disposal of stockpiles while ignoring the related problem of subsequent cleanup of sites contaminated with POPs chemicals. Such contaminated sites if redeveloped or redeployed for agricultural or housing purposes will pose significant and immediate threats to human and animal health and the environment. It is always cheaper to take precautionary and preventive action before using contaminated land for rural or urban development or put into agriculture so as to avoid expensive mistakes such as the Love Canal saga in the USA. Ghana and Nigeria have a very vibrant mining and oil producing industries in addition to other chemical industries, which are potential contaminators of POPs implicated in the Stockholm Convention and also those outside the Convention. Based on the findings of the ongoing NIPs in the two countries (also referred to in paras 16-19). Ghana and Nigeria have consequently approached UNIDO to assist them through GEF grant to develop policies and regulations for the rehabilitation of contaminated sites, capacity building in identifying contaminated land and in the selection of methodology for site remediation, public education, setting up of IMS and at a later stage through public-private partnership and other donors support, promote proper clean up of such sites while promoting the transfer of appropriate remediation technologies conforming to best available techniques (BAT) and best environmental practices (BEP).

A.2 Technology Context

4. Chemicals are essential requirements for modern society and need to be managed properly in order to achieve a suitable level of agricultural and industrial development and a high level of environmental and human health protection.

- 5. Presently, the major types of chemicals used in Ghana and Nigeria are imported. Many of them are used in or arise from industry, agricultural and public health vector disease control. Human exposure to these chemicals occurs through diet, occupation, accidents and indoor applications, particularly in rural communities and also from agricultural use. The inventory of obsolete pesticides has shown that there are stockpiles of persistent organic pollutants (POPs), which need to be disposed of since they are associated with risks to health and the environment.
- 6. The inventory of obsolete pesticides and other POPs chemical stocks is an integral component of the GEF funded Enabling Activities for the development of NIPs underway in Ghana and Nigeria and is expected to provide national listing of chemicals contaminated sites, which are not, however, associated with the identification of the risks to health and the environment that these sites pose. Both countries are covering NIP activities with the support of UNIDO and are aware of the fact that identification of contaminated sites for developing an inventory is very complicated with no available data.
- 7. Article 6, Section 1(e) of the Stockholm Convention states that Parties shall "endeavour to develop appropriate strategies for identifying sites contaminated by chemicals listed in Annex A, B or C; if remediation of those sites is undertaken, it shall be performed in an environmentally sound manner". The implication is that it is incumbent on countries to undertake rehabilitation of contaminated sites following their identification and prioritisation based on risk assessment/ management. Furthermore, the WB/GEF ASP project mentioned earlier, even while recognizing the importance of clean up of contaminated sites, has not included this aspect in its programme of work except in the case of Mali where there was consensus between partners that the severity of contaminated land requires attention. It is therefore important for all African countries to take measures and provide a systematic approach to deal with contaminated sites.

A.3 The Stockholm Convention on POPs

- 8. On 22 May 2001, the Stockholm Convention on POPs was adopted and entered into force on 14 May 2003 after the 50th country ratified the Convention. This Convention has led to a new GEF/POPs Draft Operational Programme (OP 14), and the proposed project will serve as a barrier reduction exercise that can help to inform future activities mandated or encouraged under the provisions of the Convention when it enters into force for parties.
- 9. Article 6 of the agreed text addresses the identification and management of (POPs) wastes. It requires such wastes to be "managed in a manner protective of human health and the environment." Parties must "develop appropriate strategies for identifying stockpiles, products and articles in use, and wastes covered by the treaty, after which they must manage the stockpiles in a "safe, efficient, and environmentally sound manner." The Convention requires that disposal of such wastes be done in such a way that the POP content is "destroyed or irreversibly transformed" so that it is no longer a POP, or "otherwise disposed of in an environmentally sound manner when destruction or irreversible transformation does not represent the environmentally preferable option or the persistent organic pollutant content is low."
- 10. In particular Article 6.1(e) specifically says "endeavour to develop appropriate strategies for identifying sites contaminated by chemicals listed in Annex A, B, or C, if remediation of those sites is undertaken it shall be performed in an environmentally sound manner"
- 11. Article 10 clearly puts great emphasis on public information, awareness and education to policy/decision makers, provide to the public of all available information on POPs including impact on their health and environmental effects, importance given to public participation 'training workers, scientists, educators and technical and managerial personnel'.
- 12. Article 10.1(f) and specifically advocate "development and exchange of educational and public awareness materials, education and training programmes at the national and international levels".

- 13. Article 11 puts emphasis on Research and Development (R&D) and monitoring where it specifically covers 'sources and release into the environment, presence, levels and trends in humans and environment, socio-economic impacts and harmonized methodologies for making inventories of sources and analytical techniques for the measurement of releases'. Further, Article 11.2 (b) asks among others for strengthening national scientific and technical research capabilities, particularly in developing countries.
- 14. It is always difficult to look into POPs contamination in isolation, since environment including land is exposed to wide variety of man-made activities resulting in long- and short-term chemical and biological contamination. The proposed project will also keep in its scope and coverage as much as possible some of the chemicals under the Oslo-Paris Accord (OSPAR), however, without losing the main project objective of POPs contaminated sites. The OSPAR covers: PCCDs, PCDFs, PCBs, PAHs, PCP, HCH (technical and pure quality), cadmium, lead, nonylphenols, specific xylenes, some phthalates, etc.
- 15. Ghana and Nigeria are both signatories of the Stockholm Convention. Ghana ratified the Convention on 30 May 2003 while Nigeria ratified it on 24 May 2004. Both countries have developed their NIPs and heading towards implementation of identified priorities.
- 16. The results of inventories carried out in Ghana and Nigeria as part of the preparation of their NIPs indicated that there are several hundreds of metric tonnes of stockpiles/obsolete pesticides, which may include POPs pesticides. Sites where the stockpiles are stored need to be investigated for possible soil and ground water contamination. Potential sources of POPs releases in Ghana and Nigeria include:
 - locations where electrical equipment (particularly transformers and capacitors) were serviced;
 - areas where spillages occurred during the filling of such equipment with PCBs;
 - poorly designed and maintained storage sites;
 - locations where POPs wastes were/are potentially dumped (including co-disposal of hazardous and/or domestic waste);
 - waste discharges from chemical plants, where elemental chlorine is involved in the technology;
 - sewage sludge treatment plants; and
 - former organochlorine pesticides manufacturing/formulation plants.
- 17. The immediate surroundings of all leaking transformers are potential contaminated sites. This could be as a result of spillage resulting from maintenance operations of the main utility service providers. Transformers are occasionally filled or topped up with oil, which could be PCB oil. PCB- containing wastes for example may also be found at the Accra Central Station of the Electricity Company of Ghana, where broken down transformers from all over the country are repaired. This is located in the city's biggest open market where all types of goods, including vegetables, fruits, groceries, clothes and other goods are sold. There is a drainage, which carries all spilled oil into the sea. Thus, if the transformer oil is contaminated with PCBs, it is a major hot spot not only contaminating the local areas but also the international waters. In Nigeria, similar sites contaminated with PCBs may be found at ljora warehouse of the Power Holding Company of Nigeria.
- 18. Available evidence indicates that contents of the dirty oil (PCB contaminated oil) reservoir in both countries are unofficially and illegally sold out to:
 - enterprising women who illegally use the oil or possibly PCBs to formulate beauty creams for sale on the open market;
 - welders for use in welding machines as coolants;
 - · people who apply them as lubricants in domestic sewing machines; and
 - other entrepreneurs that formulate mixtures with sawdust for industrial and domestic use as fuel.

19. There are unconfirmed reports of volumes of pesticides containers buried at some specific locations. For example in Ghana, it is alleged that the pesticides containers, which might include POPs pesticides, were buried in the early 1970's at the premises of the Plant Protection and Regulatory Services Department (PPRSD) at Pokuase in the Ga District of the Greater Accra Region and also at the Tono and Vea Irrigation projects in the Upper East Region. These locations are within important river basins such as the Densu and Volta. Ghana is very much concerned about potential POPs contamination of land and specifically refers to its priorities of action in the NIP as "carry out further investigations to identify contaminated sites, secure and label sites, identify potential remediation technologies available, establish regulation and guidelines for clean-up of contaminated sites". It requests specially technical and financial support over a period of 5-10 years. Similarly in Nigeria, the ASP project has identified some warehouses where obsolete pesticides including POPs are stocked namely Lagos, Kaduna, Ibadan and Kano. The Government of Nigeria's concern is on various studies indicating presence of POPs (pesticides and PCBs) in environmental samples, food, fish, wildlife and human milk. Even though these studies are old, they are concerned among other things, about soil contamination as one of the sources from waste stockpiles of POPs. According to the NIP, a study carried out in 2002 indicated a wide spread contamination of Nigerian soils covering farmland, industrial soils and refuse dump soils. The noted presence of POPs despite studies showing "relatively short half-lives of POPs in Nigerian soils" also raised concern. With many unknown factors, data gaps and lack of capacity to identify and monitor contaminated land, Nigeria is giving one of the priorities to capacity building contaminated soil management.

A.4. Barriers to project implementation

20. Experience gained during the project brief preparation has resulted in an improved understanding of the barriers to be overcome during the full project implementation. The major barriers identified to date include:

Inadequate National Policy on POPs

- 21. Appropriate policies and regulations constitute the first two axes in managing contaminated sites. This calls for legislation and legal framework.
- 22. A Government policy on POPs is often part of a broader policy on chemicals management. The current policy direction for the management of potentially bio-accumulative and toxic substances in both Ghana and Nigeria is inadequate and incapable of dealing with the specific requirements of the Stockholm Convention. An explicit policy needs to be established to implement the Stockholm Convention and to promote POPs free agriculture, health and industry sectors and at the same time ensure protection of the environment and the natural resources.

Inadequate policy and legal framework

23. In both Ghana and Nigeria, there are a number of laws that have some relevance to POPs and persistent toxic substances (PTS). Many of these laws, however, do not address the dangers posed to human and the environment by the chemicals in question. Where they may be relevant, the institutions that deal with them do not have the resources to monitor or research into their effects on health and the environment and do not have adequate disposal guidelines as required by the Convention.

Ghana

- 24. In Ghana, there are currently seventeen (17) existing chemical-related legislations. Although these laws are not specific to POPs, they provide a framework for the management of all chemicals and pesticides. The existing laws in the country are listed as follows:
 - The Environmental Protection Agency (EPA) Act, (Act 490) of 1994. This Act, which established the Environmental Protection Agency, seeks among other things to control the volumes, types, constituents and effects of waste discharges, emissions, deposits or other sources of pollutants and/or substances which are hazardous or potentially dangerous to the quality of life, human health and the environment through the issuance of environmental permits and pollution abatement notices.

- The Pesticides Control and Management Act, 1996 (Act 528) provides rules for registration, manufacturing, use, disposal and non-disclosure of information, classification, licensing, reporting, labelling and inspections of pesticides.
- The Food and Drugs Law, 1992 (PNDCL) 305B, which was enacted to control the manufacture, import, export, distribution, sale, use and advertisement of foods, drugs, cosmetics, household chemicals and medical devices are made from several chemical substances that may have a negative impact on health and environment if the manufacture, distribution and disposal are not controlled and managed properly.
- The Factories, Offices and Shops Act, (Act 328) 1970, which seeks to protect the health and safety of workers from the dangers posed by chemicals to employees in the working environment.
- The Standards Decree, 1973 (NRCD 1273)
- The Draft Policy and Bill on Occupational Safety and Health, 2000, which seeks to ensure that measures are instituted to ensure the attainment of optimum health for workers in all occupations in Ghana
- The Mercury Law, 1989
- The Minerals (Off-Shore) Regulations, 1962 (as amended)
- The Oil in Navigable Waters Act, 1964
- Infectious Disease Ordinance (Cap 78)
- The Prevention and Control of Pests and Diseases of Plants Act, 1965 (Act 307)
- Prevention of Damage by Pests Decree, 1968 (NLCD 245)
- Cocoa Industry Regulations, 1968 (NLCD 278)
- Merchant Shipping (Dangerous Goods) Rules, 1974 (LI 971)
- Customs, Excise and Preventive Service Law
- Local Government Act, 1992 (Act 458)
- Export and Import Act, 1995 (Act 528)
- Environmental Assessment Regulations, 1999 (LI 1652)

Nigeria

- 25. Similarly, in Nigeria, there are a number of laws set up under the Federal Ministries of Environment, Health and Agriculture, which deal with chemicals and hazardous wastes. Some of these laws are:
 - S.1.8 National Environmental Protection (Effluent Limitation) Reg. 1991
 - S.1.9 National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes) Reg. 1991
 - S.1.15 National Environmental Protection (Management of Solid and Hazardous Wastes), Reg. 1991
 - FEPA Decree 58 of 1988 (Amended by FEPA Decree 59 of 1992)
 - FEPA Decree 86 Environmental Impact Assessment 1992
 - FEPA Sectoral Guidelines and Standards 1991
 - Factories Act 1990
 - Harmful Waste (Special Criminal Provisions etc.) Decree 1988
 - NAFDAC Decree 15 1993
 - Pesticides Registration Regulation 1996
 - Pharmacy Council Decree 1992
 - IPAN Decree No. 100 of 1992
 - Customs & Excise Act 1990
 - Standards Organization of Nigeria
 - Occupational Safety & Health Guidelines
 - Nigerian Ports Authority Act
 - Nigerian Maritime Decree
 - DPR Guidelines & Standards for the Petroleum Industry in Nigeria (2002)
 - NDLEA Decree

- 26. The National Agency for Food and Drug Administration and Control (NAFDAC) also set up laws to regulate food, drugs, cosmetics, medical devices, bottled water and chemicals.
- 27. Additionally, the Factories Act 1990, Chapter 126 Vol. III Laws of the Federation of Nigeria, being implemented by the Factories Inspectorate Division of the Federal Ministry of Labour and Productivity (FML&P) concerns itself with the occupational health and safety of workers from the chemicals and other risks in the workplace. Other Ministries/Agencies that have relevant laws are the following:
 - The Produce Inspection Service Divisions of the Federal Ministry of Commerce imports chemicals and oversees the quality of produce leaving the country. It also provides industry analysis and statistical information, as well as business counselling and export assistance.
 - The Nigerian Ports Authority (NPA), which is responsible for ensuring the safe transportation, loading, unloading and handling of goods including chemicals, carriage, and embarking/disembarking of passengers in or from sea going vessels. Efforts are made to ensure that all hazardous materials imported and exported are transported in accordance with international regulations and the manufacturer's recommendations.
 - The Federal Ministry of Industry, though not an institutional manager of chemicals and pesticides, supervises industries and companies that handle chemicals in the course of production.
 - The Department of Petroleum Resources (DPR), in cooperation with Federal Ministry of Environment (FMENV), regulates the petroleum sector (both upstream and downstream). This includes regulation of hazardous materials, consignors, consignees of drilling chemicals, exploration, formulation, refineries, distribution, import and export of petroleum products.
 - The Nigerian Custom Service is responsible for the control of imports and exports of all goods including chemicals. It also ensures that the imports and exports are in accordance with the national and international regulations.
 - The National Authority on Chemical Weapons Convention (NACWC), located in the office of the Secretary to the Government of the Federation, ensures the implementation of Nigeria's obligations under the chemical weapons convention.
- 28. It is thus clear from the above that there is a need for harmonization of all these responsibilities at the government level. It is also necessary for greater efficiency and effectiveness to strengthen capacity for enforcement of laws and regulations through provision of adequate funding to the relevant government agencies, improvements in management capacity, adequate equipment, transport and staff career development.
- 29. On the other hand, the near total absence of legislation on issues related contaminated lands/sites is the first major barrier to their identification and management. Yet, it is universally acknowledged that the provision of appropriate legislation is "the beginning of wisdom" in this regard. A suitable legislative framework providing the rules of management for contaminated lands/sites including economic incentives, but also sanctions tied to compliance or failures is crucial. Difficulties in the development of suitable legislation could include:
 - low prioritisation to draft and pass such legislation;
 - often fragmented nature of responsibility for management of chemicals and contaminated lands;
 - inadequate data and information that normally underpins such legislation; and
 - considerable cost of such an undertaking including enforcement.

Inadequate comprehensive scientific/socio-economic data

30. The formulation of suitable and effective management framework for contaminated lands should be underpinned by adequate scientific and socio-economic data and information.

The information gathered must cover sources, pathways, fate and transport, human and ecosystem exposure, toxicology and ecotoxicology. A detailed understanding of the socioeconomic indices must complement it. Decision makers must take account of threats posed and costs incurred by possible changes and identify realistic measures needed to ensure effective management of contaminated lands. Difficulties in achieving scientific and socioeconomic data include:

- absence of comprehensive scientific data on toxic chemicals and the risks they pose to humans, wildlife and the environment;
- insufficient analytical facilities for hazard/risk assessment;
- lack of tools for proper assessment of the socio-economic aspects of remediation and contaminated land management;
- limited technical expertise to enable rational choice of remediation technologies and ensure successful implementation; and
- unsatisfactory environmental practices.

Ineffective enforcement of regulations and legislation

- 31. Even in countries where there is a semblance of legislation, there is no functional enforcement and surveillance procedure to ensure the effectiveness of such laws. Designing an effective system of enforcement and linking this to appropriate monitoring strategies is a complex task that calls for ongoing inputs in terms of training and resources. The difficulties in providing this necessary outfit include:
 - providing suitable training and resources to achieve a critical mass of personnel with the requisite skills and equipment to enforce envisaged legislation;
 - near absence of resources to undertake required inspection and pursue offenders and reward those who comply ; and
 - lack of technical and management capacity for monitoring to underpin enforcement.

Lack of a National Classification System

- 32. Setting priorities for remediation of contaminated lands require the existence of a rational approach for contaminated land site identification methodology and site classification system. A National Classification System (NCS) affords a vantage platform based on scientific and socioeconomic considerations for such judgement. The difficulties in adopting such a system include:
 - lack of capacity to develop a NCS;
 - lack of implementation of a global harmonized labelling system (GHS);
 - weakness in the procedures of risk assessment; and
 - lack of necessary legislation to underpin such a system.

Absence of clear responsibilities and limited coordination

- 33. The multi-sectoral nature of chemicals management in most developing country situations results in a lack of coordination, which is a *sine qua non* in the management of contaminated lands. Assigning responsibilities explicitly must be dealt within any framework legislation on contaminated lands. Barriers in assigning and agreeing responsibilities include:
 - competition amongst the various ministries and departments concerned with the management of contaminated land;
 - absence of positive engagement of key players and potential problems with assumption of liability; and
 - historical actions carried out in good faith but also in ignorance of potential for future problems.

Inadequate financial resources

34. The implementation of remediation of contaminated lands requires adequate financial resources. In developing country situation, lack of funding is and will always be a problem for reasons, which include:

- often limited budgets from governments and therefore no matching funds from bilateral/multilateral donors;
- competing demands for limited resources and lack of mechanism for evaluating comparative seriousness of competing problems;
- difficulty in applying the "polluter pays" principle while ensuring needed improvement and actions; and
- difficulties in ensuring the rational use of meagre resources.

Inadequate awareness and information

- 35. In most developing countries, information is not available to stakeholders who are in a position to influence decisions on contaminated land/site management. Provision of vital scientific as well as socio-economic data to politicians and policy makers is generally inadequate. Awareness for stakeholders on the requirements and practices for effective contaminated lands management needs to be improved. Difficulties in achieving this include:
 - limited capacity to collect relevant data and information on issues of contaminated sites and their socio-economic impacts;
 - insufficient and limited effective tools to communicate appropriate messages in a form that can be easily understood and relevant to the target audience;
 - inadequate resources to undertake outreach campaigns; and
 - low level of general awareness.

Lack of capacity and experience in selecting environmentally sound cost-effective technology for soil remediation

36. It is always difficult for developing countries to adopt well-proven expensive technologies followed in industrialized countries mainly due to lack of know-how, and the proprietary nature of technology. There are however existing technologies such as bioremediation and emerging technology such as phytoremediation that could be looked at as viable technologies for developing countries. Obviously one has to do some model pilot, scale experiments in the countries concerned, to prove their performance and pinpoint any modifications that need to be incorporated. One has to look into the merits of BAT/BEP experiences in similar developing economies.

Lack of capacity to conduct risk management decision for contaminated land/site remediation

37. Risk Based Decision Making (RBDM) is a very complicated process and before embarking on a costly land remediation exercise, one has to take into account all factors. Some are linked to capacity building in bringing stakeholders involvement, consideration of all the technology, legal, social factors are of is of utmost importance for any public and/or private involvement in land/site remediation.

A.5. Linkages to other programmes in the region

38. There are a number of ongoing and pipeline projects in Ghana and linked to POPs among other environment related projects. During the preparation of the project all relevant project personnel were met and close collaboration will be kept wherever necessary. Figure 1 gives the linkages of the proposed regional project to other projects in the region. This will provide the synergy and avoid duplication since no other project directly deal with POPs contaminated land/sites.



Fig. 1: Possible Linkages and Synergies to other Ongoing Programmes in the Region

Guinea Current Large Marine Ecosystem (GCLME)

39. The GCLME is a regional GEF funded project, which focuses on environmental degradation, pollution control and eco-diversity conservation in the Guinea Current. The project focuses on five integrated modules: resource productivity, natural resources management of fish and fisheries, pollution and ecosystem health, socio-economics and governance. This project will complement GCLME project through the prevention of pollution of the Guinea Marine Current from activities particularly the contaminated sites. It will facilitate the achievement of the outputs of the pollution and ecosystem health reduction as well as enhancing the biodiversity conservation of the Guinea Current region, sustainable development of LME resources, greater food security and the promotion of increased socio-economic benefits.

Africa Stockpiles Programme (ASP) in Nigeria

40. The Canadian International Development Agency (CIDA) along with the World Bank has already approved a subprogramme under the ASP for disposal of obsolete stockpiles of pesticides including POPs. The ASP project is aimed at clearing and disposing stocks of obsolete pesticides including POPs with a view to prevent further stockpiles and contamination of the environment. A preliminary survey carried out under the project identified some warehouses stocked with some obsolete pesticides prohibited under the Stockholm Convention. The warehouses are located in Lagos, Ibadan, Kano and Kaduna. This proposed project would link with the ASP project in identifying the extent of soil/site contamination due to the indiscriminate use and bad storage of obsolete pesticides, especially those that are POPs.

Strategic Approaches for International Chemicals Management (SAICM)

41. SAICM has been finalised and includes a Global Action Plan that has put forward a number of concrete measures mainly intended to facilitate implementation of global conventions and agreements including the relevant chapters of Agenda 21 dealing with environmentally sound management of chemicals and chemical wastes. Ghana and Nigeria participated fully in the Global Action Plan and play an important role in the African Regional Consultation to the Action Plan. Under concrete measures, SAICM refers to 288 items and among other things item 253 specifies:

"establish infrastructure for analysing and remediating contaminated sites. Provide training in rehabilitation approaches. Develop capacity to rehabilitate contaminated sites. Develop remediation techniques. Increase international cooperation in provision of technical and financial assistance to remedy environmental and human health effects of chemicals ..."

Danish International Development Agency (DANIDA) Densu Basin Pollution Control Project in Ghana

- 42. DANIDA is currently supporting Ghana through the Water Resources Commission to address the Densu River Basin pollution problem. The main sources of water pollution have been identified to include pesticides mismanagement, contaminated farmlands along the river basin, domestic and industrial wastes from the numerous settlements along the Densu river and its tributaries, unconventional fishing practices in the Densu River and Weija Lake downstream, which form the main source for water supply for the whole of Western part of Accra.
- 43. The Pokuase Agricultural Station, located on the banks of the Nsakyi River (a major tributary of the Densu River) was identified as a major hotspot where obsolete and containers of POP pesticides have been disposed off through burial. However, decontamination of such sites has not been included in the DANIDA support programme. Extension of support to cover this current proposal for decontamination, public participation, awareness creation and education in the basin by DANIDA will facilitate achievement of these noble objectives.

Country Environment Analysis (CEA) in Ghana

44. The CEA in Ghana is a multi-donor support programme to carry out a country environmental analysis, focusing on forestry, wildlife, urban/rural development and land degradation. The project support provides assistance for and promotion of water and sanitation facilities, sustainable agricultural practices and reclamation of degraded mining lands. This proposed project would strive to complement the CEA through contributing to the safety and quality of underground water from POP contamination and enhancement of agricultural productivity, urban/rural development and analyze the potential use of remediated lands for agricultural, industrial and commercial purposes.

PCB Management (GEF/UNDP/GHANA)

45. The main objective of the PCB management project is to identify all possible sources of PCBs such as capacitors, transformers, contaminated sites, stockpiles and any other sources. This would enable the development of disposal plans. However, this project like the ASP does not include decontamination of PCB-contaminated sites as an additional responsibility. This regional project, to identify and treat selected chemically contaminated sites, could be a major collaborator to clean the environment of POPs.

NGO/Industries cooperation

- 46. On 1st May 2004, the International POPs Elimination Network (IPEN), in partnership with UNIDO and UNEP began a global NGO project called the International POPs Elimination Project (IPEP). The GEF provided core funding for the project. The three principal objectives of IPEN are:
 - Encourage and enable NGOs in 40 developing countries in their efforts in preparation for the implementation of the Stockholm Convention.
 - Enhance the skills and knowledge of NGOs to help build capacity as effective stakeholders in the Convention implementation process.
 - Help establish regional and national NGO coordination and capacity in all regions of the world in support of long-term efforts to achieve chemical safety.
- 47. Two NGOs covering the Anglophone Africa in Tanzania and Francophone Africa in Senegal are signatories to this agreement and will be linked on a long-term objective.
- 48. Oil and mining industries play a key economic role in Nigeria and Ghana. As already mentioned, NGOs and the industries themselves are aware of soil/water contamination caused

by these activities using POPs chemicals such as PCBs and HCBs. Based on discussions during the preparatory phase, the government, private and public industries and the NGOs have shown great interest in the project and will be joining in the capacity building on contaminated site identification, technology selection and prioritisation leading to future land remediation.

A.6 Linkages to development objectives of the national/regional authorities, and UN common development goals

- 49. Most countries with developing economies and economies in transition lack adequate and appropriate technical capacity to properly destroy obsolete stocks of POPs and/or remediate POPs-contaminated environmental reservoirs. By establishing criteria and guidelines for the identification and selection of appropriate methodology for identification of polluted sites and selection of environment friendly and economically feasible low cost remediation as well as establishing guidelines for the deployment of these technologies, this project would provide a model for the decontamination of sites associated with POPs in the region. The World Bank document (2005) entitled "Opportunities for integrating the Sound Management of Chemicals to the Millennium Development Goals (MDG)" specially links:
 - MDG 1: Eradicate poverty and extreme hunger MDG 4: Reduce child mortality MDG 5: Improve maternal health MDG 6: Combat /HIV/aids, malaria and other diseases MDG 7: Ensure environmental sustainability MDG 8: Build a global partnership for development
- 50. This document clearly cites the vulnerability of poor people in particular to chemical risks and links agriculture, fishery, health, energy, mining, water and sanitation sectors' exposure to POPs implicated in the Stockholm Convention.
- 51. Following the identification of hotspots using the proposed methodology for site identification and after the selection of the economically viable and environmentally friendly remediation technologies, pilot scale remediation experiments for low cost technologies will be undertaken both in Ghana and Nigeria. Special emphasis will be given to sites that can be considered as hotspots of contamination. Suitable training and supervisory assistance will also be provided to the participating countries by linkage and partnership arrangement with relevant institutions in the developed world. Most importantly, the proposed project will bring out two sets of toolkits: one for the systematic identification of land/sites contamination using low cost technologies. Such toolkits will benefit the whole of the African region.

A.7 Civil Society Involvement

- 52. Civil Society involvement was a hallmark of the preparation activities. Repeated consultations with the NGO community took place in Ghana and Nigeria. In addition, preparatory activities included two regional seminars. The first one held in Abuja, Nigeria on 26th January 2006 considered the technology options for site remediation and the second one held in Accra, Ghana on 2nd February 2006 considered the policy and legal framework for the project. In both seminars more than 20% of the participants were NGOs, educational institutions, press and TV media.
- 53. Even more extensive Civil Society involvement is planned during the implementation of this project. Arrangements have therefore been included for substantial and ongoing country-based Civil Society participation both in project implementation and project monitoring in both Ghana and Nigeria. The project also provides for explicit and continuing regional Civil Society involvement in both the work of the Project and the overall Programme linkages with the NGO network in Africa, as shown in Fig. 1. A sample letter from a NGO organization, Nigerian Environmental Society (NES) is attached in Annex 6 Appendix 2.

A.8 Regional approaches to POPs stockpile destruction

54. Since the ASP has taken a Regional Approach to the elimination of obsolete stockpiles of pesticides on the African continent, this project is considered as an obvious extension into

identification and remediation, if required, of contaminated lands. For this reason, there will be close linkages between the project and the ASP.

A.9 Inclusion of other countries in the region

55. As referred earlier (Fig.1), Nigeria and Senegal's active role in SAICM and Mali's initiative in land contamination will all strengthen the inclusion and participation of more countries in the regional project.

SECTION B. REASONS FOR UNIDO ASSISTANCE

- 56. Under the Multilateral Environmental Agreements, UNIDO has been one of the leading agencies in implementing projects under the Montreal Protocol and is an Executing Agency with Expanded Opportunities in Stockholm Convention on POPs. Under the GEF funded Enabling Activities, UNIDO is assisting more than 40 countries in the preparation of the NIP as one of the requirements of the Parties to comply with the obligations under the Stockholm Convention.
- 57. Under the enabling activities projects, UNIDO has been providing assistance on capacity building in the participating countries in understanding the implications of Stockholm Convention and providing expertise in generating the following POPs related inventories such as:
 - Inventory of use
 - Inventory of import/export
 - Inventory of stockpiles
 - Inventory of sources
 - Inventory of polluted sites
- 58. In addition, UNIDO provided necessary assistance in preparing and/or updating National Chemical Profiles. With National Executing Agencies, UNIDO made sure that all relevant stakeholders were involved during the preparation of the NIP. In all these activities the national expertise was used extensively.
- 59. The proposed project encompasses, for the first time on a regional basis, to establish policy/legal framework for dealing with POPs contaminated lands/sites, the systematic identification of POPs contaminated lands/sites, carry out risk assessment, prioritization and risk management and develop appropriate technologies for land remediation. In the process of implementation of the project, it is proposed to identify local institutions as focal points for various outputs and strengthen their facilities and train staff to provide long- term sustainability.
- 60. Land remediation is a complex and expensive process and needs a well established policies/legal framework, robust methodology for identification of contaminated lands, proper analysis of soil samples, a good understanding of risk analysis, identification and application of appropriate technologies and good participation of all stakeholders.
- 61. UNIDO for many years has been actively involved with UNECE in expert group discussions on decontamination of soil and water contaminated by toxic chemicals. In collaboration with UNECE, UNIDO has put a valuable compendium of "Soil clean-up technologies and soil remediation companies".
- 62. Being a complex subject, UNIDO will use as much as possible local experts and has identified a technical partner in GeoEnvironmental Research Centre (GRC) located in Cardiff, UK. The centre is one of the leading institutions in Europe dealing with reclamation of brown fields. The expertise of the Centre will be fully utilized to build the regional capacity in the project.

SECTION C. THE PROJECT

C.1 Objective of the Project

63. The overall objective of the programme is to build capacity and strengthen institutional arrangement and develop appropriate strategies for identifying sites contaminated by chemicals listed in Annexes A, B and/or C of the Stockholm Convention. The project will also assess the viability of environmentally sound and low-cost remediation technologies. Results of these pilot project experiences will be extended to other countries in the region.

Immediate Objective of the Project

64. The immediate objective of the programme includes:

- Development of policy and legal frameworks for management of contaminated lands/sites; and
- Strengthening of institutional capacity for mitigation of land contamination and sustainable land management, potential hotspots identified and prioritised for pilot testing of appropriate low-cost environmentally sound technologies, if remediation is required.

C.2 The UNIDO approach

Project implementation:

- 65. The project implementation will be under the oversight of a Regional Ministerial Committee (RMC) to ensure that a high-level importance is given to policy and legal objectives of the project. The organizational arrangement (Fig. 2) is proposed and will be further modified after further consultations. The policy units in Ghana and Nigeria will be in contact with the Regional Coordination Unit (RCU) and RMC to be briefed on the policy issues, ways and means to be included in the countries' legal framework and existing relevant laws and decrees and finally agreeing to enforcement at national and regional levels. The proposed RCU office will be located at the UNIDO Regional Office in Abuja for ease of communication from the Regional office to all counterpart organizations in Nigeria and Ghana. It is also cost-effective in the sense that UNIDO will cover the salary of the Regional Coordinator, office space and at least one secretary under its field operational budget. The Government departments will deal with national coordination units assigned to them on a national basis.
- 66. While the RCU will take care of the day-to-day functioning of the project, the Regional Steering Committee (RSC) will supervise the overall implementation of the project and recommend any modifications or change of work plan including budget provisions. The RSC will meet twice a year, once in Nigeria and once in Ghana. During the project implementation, it will meet at UNIDO or in an institution in Europe that provides technical training.
- 67. The establishment of Geoenvironmental Centres (GCs), linked to private sector, is a unique undertaking in the region that, with fully developed programmes on land/site development of contaminated land, will have a cost-effective benefit to the region. Care has been taken not to establish any stand-alone institution that would eventually be difficult for governments to cover the operational costs from the recurrent budgets. The Centres will play a key role in technical capacity building in Ghana and Nigeria on identification of contaminated sites due to industrial, non-industrial and agricultural activities, develop environmental indicators, soil and other matrices analysis for prioritization of contaminated land based on risk assessment/management and develop capacity to select appropriate low cost technology for remediation of POPs contaminated soil. These Centres will continue to be responsible to develop and update the toolkit for stepwise strategy to identify and prioritize POPs contaminated sites and methodology for the selection of appropriate low-cost technology for remediation, if required.
- 68. It is also conceived that industries especially oil, mining (particularly users and produces of PCBs and HCBs) and agricultural industries (users and produces of pesticides) will join as partners in running the Geoenvironmental Centres with the Government in line with public-private partnership to share the cost beyond the proposed project.

Figure 2: Proposed Organization Chart for the implementation of the Regional Project



Note: The Centre will not be a stand-alone institution. It will be established within the existing institutions in order to be cost-effective and sustainable in the long-term.

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Intertwining of Institutions

69. In order to promote sustainability and capacity building, the Geoenvironmental Centre, IMS unit and the Risk Assessment units will intertwine with similar institutions in industrialized world. Such an intertwining will promote interaction within the project but also in other areas related to sound environmental management beyond the project life. This institution is identified as the Geoenvironmental Research Centre located in Cardiff, which will act as a Technical Partner in the project.

Cost-Effectiveness

70. The project aims at cost-effectiveness means of environmentally sound management of POPs contaminated sites in Ghana and Nigeria. Past experiences in the US Super Fund exercise and the experience of Holland in the 1960s due to lindane contamination have shown that land remediation by all means is an expensive undertaking particularly to developing countries. According to UNIDO/UNECE "Compendium on soil-cleanup technologies" published in 2000, a remediation cost range of EUR 100-300 per metric tonne is entertained, depending on the level of contamination, selection of technology and the level of clean up required by law for various development uses. This project will aim to verify if these costs could be decreased and render remediation technologies usable for environmentally acceptable standards and if low-cost technology deployment for Ghana and Nigeria could be affordable to private-public sector participation. The outputs of the toolkit project would be applicable (including the policy/legal framework, the toolkit for identification of POPs contaminated sites) for the whole region of Africa in a cost-effective way. In addition, in each component, effective measures have been taken to reduce the cost such as the RCU office be located in the UNIDO Regional Office and the NCUs be hosted in the existing government offices.

Stakeholder participation/preparation

71. Throughout the project preparation, stakeholders' participation and discussions were given cardinal importance and this will continue to be a major feature of the project implementation. The project will stress participation within the two countries through workshops, IMS and dissemination of information giving transparency. NGOs along with relevant ministries will be part of the public awareness and environmental education programmes. The table below shows the list of stakeholders that have fully agreed to participate in the project implementation.

Organization	Involvement
NIGERIA	
1. Federal Ministry of Environment	Overall in-charge of implementing the project in Nigeria/Geoenvironmental Centre/IMS
2. Federal Ministry of Agriculture and Natural Resources	POPs pesticides contamination/data collection and related issues
3. Federal Ministry of Health	Health indicators/interpretation
4. National Agency for Food and Agricultural Administration and Control	Pesticides export/import registration
5. Power Holding Company of Nigeria	PCB contamination/partner for Geoenvironmental Centre and private-public partnership
6. Nigerian National Petroleum Corporation	POPs and other PTS contamination, partner with Geoenvironmental Centre and private-public partnership
7. Print and Electronic Media	Public awareness/information dissemination (IMS)
8. Manufacturing Association of Nigeria	General aspects of chemical contamination
9. Mobile Oil Company Plc.	Part of private-public partnership
10. Nigerian Environment Society	Public awareness/IMS
11. Clean-up Nigeria Environmental Resources Managers Ltd.	Policy aspects

Organization	Involvement
GHANA	
1. Ministry of Environment and Science – Environmental Protection Agency Ghana	Overall implementation of the project in Ghana/IMS
2. National Plant Protection, Ministry of Agriculture	POPs pesticides contamination
3. Electrical Company of Ghana	PCB contamination and private-public partnership
4. Council of Scientific and Industrial Research	Analysis of contaminants
5. EcoLab, University of Ghana, Accra	Geoenvironmental Centre

Rationale for GEF Intervention

- 72. In general, the project has been designed in full conformity with GEF policies and programme guidelines. It is built upon a partnership between and among the Implementing and Executing Agencies, the Government, the Private Sector and the bilateral donors. It enjoys the strong support of Civil Society at local, national and regional levels.
- 73. The project is consistent with the GEF operational programme on POPs, OP # 14 (GEF/C.22/Inf.4), and is aligned with POPs strategic objective 4 "Partnering in the demonstration of feasible, innovative technologies and practices for POPs reduction". This programme emphasizes the need to develop and strengthen country capacity to fulfil its obligations under the Stockholm Convention through the provisions of on-the-ground interventions to implement specific phase-out and remediation measures at national and/or regional level and includes provision for capacity building. The project is consistent with this stated intent of OP#14, in particular its para 16, which states that on-the-ground interventions to assist eligible countries Include "environmentally sound destruction of wastes that contain POPs and remediation of related affected sites, where warranted, taking into account the assessment of the risks posed to ecosystems and human health and cost-effectiveness". This paragraph further states that activities eligible for GEF funding may include identification, containment and stabilization of wastes that contain POPs and environmentally sound management of stockpiles. Lastly, the proposal responds to OP#14 emphasis on strengthening capacity and infrastructure and institutions at different levels, monitoring, strengthening of enforcement capacity and facilitation of technology transfer.

C.3 RBM code and thematic area code

Stockholm Convention - BC.16

C.4. Expected outcomes

- 74. At the end of the project, the two participating countries, Ghana and Nigeria, would have developed the capacity to systematically identify POPs contaminated lands and sites and would have evolved and endorsed regional policy and national legal framework for proper management of POPs contaminated sites. The countries would have achieved in preparing a toolkit for the selection of appropriate technologies for the countries to adopt in a stepwise manner using risk assessment/management approach.
- 75. The outcome would be a full participation of all stakeholders in the two countries and greater understanding of the public in awareness and environmental education related to POPs contaminated lands/sites.
- 76. The two local Geoenvironmental Centres established under the project in Ghana and Nigeria would have trained staff and facilities to identify/analyze contaminated land/sites, carry out full risk assessment according to national/international standards, carry out experimental scale land remediation techniques and select appropriate technologies for implementation. The countries will have the capability to assess socio-economic impact of POPs contaminated land/sites.

- 77. The countries would have established Regional/National Information Management System for POPs and other toxic contaminants, which would be updated periodically and made accessible to all interested parties.
- 78. A regional monitoring and evaluation system would have been in place and all of these will make the project outcome sustainable and replicable for the whole African region.

Output/ Activity	Description	Responsibility
Output 1	A suitable organization arrangement set up for timely and well monitored implementation of the project	
Activity 1.1	Establish a Regional Ministerial Committee (RMC) from Ghana and Nigeria for overall monitoring of the project implementation and meeting twice annually.	RIDO (Abuja)/Ghana (EPA)/Nigeria, (FMENV)
Activity 1.2	Establish a Regional Steering Committee (RSC) to meet three times annually to monitor the progress of the project, make recommendations for any changes/modifications to activities outputs and budget allocations. Prepare Terms of Reference for the RSC.	UNIDO/RIDO(Abuja)/Ghana (EPA)/Nigeria (FMENV)/GRC(Cardiff)
Activity 1.3	Establish a Regional Coordination Unit (RCU) for the day-to-day implementation of the project. Prepare Terms of Reference for the Unit.	UNIDO/RIDO/Ghana (EPA)/Nigeria (FMENV)
Activity 1.4	Recruit Chief Technical Advisor (CTA).	UNIDO
Activity 1.5	Appoint Regional Co-ordinator and administrative staff for the RCU.	UNIDO/RIDO(Abuja)
Activity 1.6	Identify and recruit National Project Director and administrative staff in each country.	RIDO (Abuja)/Ghana(EPA)/Nigeria (FMENV)
Activity 1.7	Establish all the National Coordination Units and prepare Terms of Reference.	RIDO (Abuja)/Ghana(EPA)/Nigeria (FMENV)
Activity 1.8	Equip the RCU with office equipment and other facilities as agreed during the project implementation.	UNIDO/CTA/RIDO
Activity 1.9	Skill share workshops in Ghana and Nigeria annually for project teams (RMC and RCU) and other potential country participation.	UNIDO/CTA/RSC/RIDO
Output 2	Establishment of Regional Policy and National Legal frameworks for the management of contaminated sites	
Activity 2.1	Develop regional policy for the management (enforcement, monitoring and evaluation) of contaminated sites based on a risk assessment model.	UNIDO/CTA/RCU/International experts/National Experts
Activity 2.2	Recruit international and national experts to assist in the drafting of the environmental legislation.	UNIDO/CTA/RCU/Ghana/ Nigeria
Activity 2.3	Develop, reform and extend existing policy and legislation to cover the management of contaminated sites.	UNIDO/CTA/RCU/GRC/ National and international experts
Activity 2.4	Keep the RMC fully informed of the policies developed in and to have overall responsibility for monitoring the implementation of the policy when enacted through national legislation.	RSC/RCU
Activity 2.5	Establish regional/national training programme for staff in the meanings, requirements and enforcement of the legal framework.	UNIDO/CTA/RCU/National/ International experts /GRC
Output 3	National and Regional Capacity Building and Institutional Strengthening	
Activity 3.1	Establishment of a Regional/ National Classification System for contaminated sites.	RCU/CTA/GRC/National experts

C.5. Outputs and activities

Output/ Activity	Description	Responsibility
Activity 3.2	Strengthening of institutional capacity for mitigation of land contamination and for sustainable contaminated land management.	GRC/RCU
Activity 3.3	Human resource capacity development on sustainable methodologies for contaminated land site identification and remediation.	GRC/RCU
Activity 3.4	Development of capacity for programmes of stakeholder engagement, public awareness and education programmes.	RCU
Output 4	Toolkit for the selection of environmentally sound and economically feasible remediation technologies for Ghana and Nigeria	-
Activity 4.1	Establish two national Geoenvironmental Centres within an existing institution (public-private sector partnership) in Ghana and Nigeria for remediation of (POPs) contaminated sites.	RCU/GRC/CTA
Activity 4.2	Develop methodology for the systematic and stepwise identification of potentially POPs contaminated sites in Ghana and Nigeria with a regional prospect (including all risk studies).	RCU/GRC/CTA/UNIDO
Activity 4.3	Develop a framework, including an analytical toolkit for a decision support system for the selection of environmentally sound economically feasible technologies for the remediation of POPs contaminated sites.	UNIDO/GRC
Activity 4.4	Deploy selected methodology and framework for the identification and selection of appropriate low-cost remediation technology for POPs contaminated sites based on samples taken from the contaminated sites.	RCU/GRC
Activity 4.5	Undertake experimental project(s) in Ghana and Nigeria to verify effectiveness of low-cost technology and validate the site selection methodology, the framework for remediation technology selection and the selected technology option. No site remediation will be undertaken.	RCU/GRC
Output 5	Establishment of environmental IMS and framework for stakeholders engagement and public educational and awareness Programme	
Activity 5.1	Development of project strategy for communication and stakeholder engagement including a strategic communication plan.	RCU
Activity 5.2	Establish, organise and maintain effective, national databases for potentially POPs and other PTS contaminated sites to assist in site prioritisation and best practise development.	RCU/GRC
Activity 5.3	Establishment of an effective environmental Information Management System (IMS) to share information, relevant assessment tools, classification system, remediation methodologies and best practices techniques through the development and deployment of a 10-year IMS Strategic Plan.	RCU/GRC
Activity 5.4	Undertake activities necessary to strengthen the understanding of POPs issues through programmes of education and awareness for all relevant stakeholders. Promote regional awareness outside the participating countries in the ECOWAS region.	RCU/GRC/CTA
Activity 5.5	Development and deployment of complementary websites, newsletters and systems for internal and external dissemination of POPs related information.	RCU/NCU
Output 6	Regional Monitoring and Evaluation Plan	
Activity 6.1	Develop/assess baseline for M&E indicators for the project outputs.	RCU/GRC/UNIDO
Activity 6.2	Establish a socio-economic assessment and indicators for POPs exposure likely to emanate from contaminated sites.	RCU/GRC/UNIDO
Activity 6.3	Mid-term and terminal Project Implementation Review (PIR) exercise (excluding UNIDO staff time).	UNIDO/RCU
Activity 6.4	M&E of the various non-civil society stakeholders.	RCU/NCU/UNIDO
Activity 6.5	Establish continuous civil society involvement/participation in M&E.	RCU/NCU

C.6 Risks, Sustainability and Commitment

- 79. The five principal risks that need to be taken into account for this project include:
 - The possibility that the project will not be sustainable for financial and other reasons beyond the life of the GEF intervention.

The risk is low due to the fact that the capacity building achieved in the project would be broadly applicable to many similar toxic contaminants.

• The possibility that there exists inadequate and ineffective political will, government support and actual commitment for the project.

This is low since the project puts emphasis on policy and legal framework, country driven and country ownership approach and will be implemented under the supervision of a committee at Ministerial level indicating full commitment.

• The possibility of inadequate timeframe in which to complete and achieve the outlined tasks.

The risk is none due to the fact that the implementation will be based on a workplan that will be monitored periodically and remedial action and adjustments made to meet the timely inputs to achieve the outputs.

• The possibility of inadequate and ineffective stakeholder participation during the project as well as the possibility of conflicting long-term stakeholder priorities.

The risk is low due to the fact that during the preparation of the country NIPs and the project brief, all relevant stakeholders played an important role and even wanted expanded coverage of toxic contaminants and not restricted to POPs only.

Sustainability, replicability, commitment and future sites contamination prevention

- 80. The project gives great importance to policy development and legal framework for giving credibility, sustainability and above all commitment at ministerial level due to its role in Outputs 1 & 2 of the project.
- 81. The capacity building, especially in public awareness, environmental education, NGOs and stakeholders' involvement and establishment of a well-functioning IMS will provide the long-term knowledge upgrade of public, civil servants and civil society, which will have its own momentum for providing information on POPs land pollution and consequent impact on other environmental matrices including water bodies.
- 82. Sufficient cooperation/linkage with projects related to Stockholm Convention in the region is envisaged in the implementation of the project.
- 83. During the project brief preparation, there has been a great cooperation and understanding and full involvement and interaction among the national experts, several Ministries and NGOs in order to keep the partnership, country ownership and country driven approach.
- 84. Many of the outputs from the six components offer scope of replicability to other countries in the region. It is envisaged to hold two regional seminars in cooperation with ECOWAS as part of the activities to promote policy/legal framework, enactment and enforcement and also on the use of toolkit to stepwise identify POPs contaminated sites/lands and carry out risk assessment/management strategy to prioritise contaminated lands and in selecting appropriate technology, if remediation is needed.
- 85. The expectation is that by enacting policy/legal framework on a national basis and consequently on a regional basis will have an impact on the prevention of future land contamination. Projects like the ASP that look after the prevention of future accumulation of obsolete stocks and as part of NIP action taken in industrial and non-industrial categories implicated in the Stockholm Convention, the toolkit and the set of policies should as well take care for the elimination or reduction of POPs. This will have a direct effect on land contamination prevention. This project strategy of monitoring/containment of POPs contaminated land will contribute to the prevention of further contamination.

- 86. There will be no creation of any new stand-alone centre but only existing institutions and laboratories will be upgraded thereby increasing the probability of long-term sustainability and replicability.
- 87. As part of the Outputs 3 and 4, a toolkit will be prepared by a group of national and international experts. Such a toolkit will assist the participating countries to identify POPs contaminated sites, carry out risk assessment/management to adopt environmentally sustainable management of POPs contaminated sites and prevent any future contamination on a systematic approach. The toolkit will also provide a reference guide on available low cost technologies for developing countries and countries with economies in transition. The toolkit will be further optimised in consultation with other agencies such as UNEP/UNECE/FAO for universal application on a national/regional/global basis. In the long run, this should help in national/regional and even global mapping of highly contaminated sites. It will also include the policy/legal framework aspects on a national or regional basis. These aspects will assure replicability of this output and add to awareness to policy issues by the stakeholders.
- 88. The proposed centres in Ghana and Nigeria will be part of existing institutions and will be miniature models of the Geoenvironmental Research Centre located in Cardiff, UK, who will act as technical partner for this project. It is also envisaged that once these local centres are established, there will be twinning arrangements among these Centres to assure a long-term sustainability. It is also envisaged that some NGO organizations, industries and governmental departments will use the services of these centres. The proposed set-up for GRC is given below:



Proposed set-up for Geoenvironmental Centre (GC) in Ghana and Nigeria

* Ghana: the EcoLaboratory at the University of Ghana, Accra will accommodate the GC.

Nigeria: the GC will be established in one of the environmental laboratories of the Ministry of Environment, Lagos.

C.7 Timelines of the activities – Tentative Workplan

Component	Activities		Y	ear 1			Year 2				Yea	/ear 3			Year 4		
		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
1. Project Coordination	1																
	TORs for RMC/RSC/RCU/NCUs																
	Establish all UNITS with staff/equipment																
	Skill share workshops, for RMC/RCU/NCUs and regular activities review meetings, project evaluation, etc.																
2. Regional policy and	legal framework																
	Develop regional policy for management of contaminated sites																
	Recruitment of international/national experts to assist in drafting of environment legislation																
	Keep RMC fully informed of policies developed to facilitate enactment																
	Keep all stakeholders involved during policy development																
	Organize and conduct regional/national training programmes of staff on requirements /enforcement of legal framework							_									
	Policies/legal framework enacted																
	Develop indicators for monitoring policy enactment and enforcement																
3. National and regiona	I capacity building and institutional strengthening																
	Develop national/regional classification system																
	Strengthening of institutional capacity for mitigation of land contamination and sustainable contaminated land management					_				_					_		_
	Human resource development on sustainable methodologies for contaminated land site identification /remediation					_									_		
	Develop programmes for stakeholders involvement/public awareness and education																
	Draw plans for required training for trainers to sustain the programme																

Component	Activities		Y	ear 1			Year 2					ar 4					
		1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
4. Toolkit for selection	on environmentally and economically feasible remediation technologies for the Region.																
	Establish two Geoenvironmental Centres in participating countries with required trained staff/equipment																
	Develop methodology for systematic and stepwise identification of potentially POPs contaminated sites with regional context including all risk studies																
	Develop an analytical tool kit for decision /support system for environmentally sound and economically feasible technologies for contaminated sites					_	_							—			
	Deploy selected methodology and framework for the identification and selection of appropriate low-cost technology for POPs contaminated sites based on samples taken from the contaminated sites.					-	—						—				
	Carry out experiments to verify effectiveness																
5. IMS public awaren	ness and environmental education																
	Develop project strategy for communication for all parties engagement																
	Establish an effective data base on POPs and other PTS contaminated sites																
	Establish IMS as per requirement for a 10 year IMS strategy plan														—		
	Develop/deploy complimentary websites, newsletters for regional dissemination of POPs related information n																
	Organize two regional seminar in collaboration with ECOWAS on project achievements																
6. Regional M&E Pla	an																
	Develop/assess baseline for M&E indicators for the project outputs																
	Establish socio economic assessment and indicators for POPs exposure from POPs contaminated sites					_	—						—				
	Mid term and terminal project review in accordance with GEF/UNIDO guidelines																
	M&E of various civil society stakeholders																
	Involve civil society /participation in M&E																
7. Draw plans for lon	7. Draw plans for long term sustainability /replicability of the project and make an evaluation plan																

SECTION D. INPUTS

D.1	Counterpart Inputs		
	Government of Ghana (in-kind)	US\$	250,000
	Government of Nigeria (in-kind)	US\$	250,000
	Government of Nigeria (in cash)	US\$	900,000
	Other donors:		
	GRC, UK (in-kind)	US\$	250,000
	Bilateral/Multilateral donors (in-kind/cash)	US\$	150,000
	(such as CIDA (Canada); DANIDA (Denmark);		
	mining industries in Ghana; GTZ (Germany);		
	ECOWAS, etc.)		
D.2	UNIDO inputs (in-kind)	US\$	200,000
	(in cash)	US\$	100,000
D.3	GEF (cash)	US\$2	2,000,000

SECTION E. BUDGET

E.1 PROJECT BUDGET (GEF only)

Component	Budget	Description	Year	1	Year	2	Year	3	Year 4		TOTAL	
	IIIIe		US\$	w/m	US\$	w/m	US\$	w/m	US\$	w/m	US\$	w/m
1. Project Coordination	11-01	Chief Technical Advisor	15,000	1.5	20,000	2.0	15,000	1.5	10,000	1.0	60,000	6.0
	15-00	Project travel (consultants/experts)	5,000		5,000		5,000		5,000		20,000	
	21-02	Subcontract (NCUs)	20,000		50,000		40,000		20,000		130,000	
	21-03	Subcontract (RCU)	5,000		5,000		5,000		5,000		20,000	
	45-00	Office equipment	5,000				5,000				10,000	
Subtotal			50,000	1.5	80,000	2.0	70,000	1.5	40,000	1.0	240,000	6.0
2. Regional policy/legal	11-01	Chief Technical Advisor			5,000	0.5	5,000	0.5			10,000	1.0
Iraniework	11-50	Short-term consultants	20,000	2,0	20,000	2.0	10,000	1.0	10,000	1.0	60,000	6.0
	13-00	Admin. Support	3,000	1.5	3,000	1.5	5,000	2.5	4,000	2.0	15,000	7.5
	15-00	Project travel (consultants/experts)	2,500		3,000		2,500		2,000		10,000	
	17-50	National consultants	20,000	4.8	20,000	4.8	10,000	2.4	10,000	2.4	60,000	14.4
	21-01	Subcontract (GRC)	5,000		5,000		10,000				20,000	
	33-00	Training	15,000		20,000		10,000		5,000		50,000	

Component	Budget	Description	Year	1	Year	2	Year	3	Year 4		TOTAL	
	inte		US\$	w/m	US\$	w/m	US\$	w/m	US\$	w/m	US\$	w/m
	35-00	Workshops/meetings	10,000		10,000		5,000				25,000	
Subtotal		75,500	8.3	86,000	8.8	57,500	6.4	31,000	5.4	250,000	28.9	
3. National and Regional	11-01	Chief Technical Advisor			5,000	0.5	5,000	0.5			10,000	1.0
institutional strengthening	11-50	Short-term consultants	5,000	0.5	10,000	1.0	5,000	0.5	10,000	1.0	30,000	3.0
	13-00	Admin. Support	3,000	1.5	3,000	1.5	5,000	2.5	4,000	2.0	15,000	7.5
	15-00	Project travel (consultants/experts)	5,000		5,000		5,000		5,000		20,000	
	17-50	National consultants	5,000	1.2	15,000	3.6	10,000	2.4	10,000	2.4	40,000	9.6
	21-01	Subcontract (GRC)	32,000		48,000		64,000		16,000		160,000	
Subtotal			50,000	3.2	86,000	6.6	94,000	5.9	45,000	5.4	275,000	21.1
4. Toolkit for selection of	11-01	Chief Technical Advisor	5,000	0.5					5,000	0.5	10,000	1.0
environmentally and economically feasible remediation technologies for Ghana and Nigeria and establishment of national Geoenvironmental Centres	11-50	Short-term consultants	20,000	2.0	20,000	2.0	10,000	1.0	10,000	1.0	60,000	6.0
	13-00	Admin. Support	2,000	1.0	4,000	2.0	8,000	4.0	4,000	2.0	18,000	9.0

Component	Budget	Description	Year	· 1	Year	2	Year 3		Year 4		TOTAL	
	inic		US\$	w/m								
	15-00	Project travel (consultants/experts)	5,500		7,500		7,500		6,500		27,000	
	21-01	Subcontract (GRC)	55,000		90,000		112,000		28,000		285,000	
	21-02	Subcontract (NCUs)	30,000		30,000		30,000		25,000		115,000	
	21-03	Subcontract (RCU)	10,000		15,000		10,000		10,000		45,000	
	33-00	Training	10,000		20,000		20,000		10,000		60,000	
	35-00	Workshops/meetings	10,000		5,000		5,000		5,000		25,000	
	45-00	Equipment	60,000		100,000		100,000		30,000		290,000	
Subtotal			207,500	3.5	291,500	4.0	302,500	5.0	133,500	3.5	935,000	16.0
5. IMS, public awareness	11-01	Chief Technical Advisor					5,000	0.5	5,000	0.5	10,000	1.0
education	11-50	Short-term consultants	10,000	1.0	5,000	0.5	5,000	0.5	5,000	0.5	25,000	2.5
	15-00	Project travel (consultants/experts)	3,000		2,500		2,500		2,000		10,000	
	21-01	Subcontract (GRC)	2,000		10,000		6,000		2,000		20,000	
	21-02	Subcontract (NCUs)	5,000		10,000		10,000		5,000		30,000	
	21-03	Subcontract (RCU)	3,000		10,000		5,000		2,000		20,000	

Component	Budget Description		Year 1		Year 2		Year 3		Year 4		TOTAL	
	inte		US\$	w/m	US\$	w/m	US\$	w/m	US\$	w/m	US\$	w/m
	33-00	Training	10,000		10,000		15,000		5,000		40,000	
	35-00	Workshops/meetings	10,000		10,000		20,000		10,000		50,000	
Subtotal		43,000	1.0	57,500	0.5	68,500	1.0	36,000	1.0	205,000	3.5	
6. Regional M&E plan	11-50	Short-term consultants	5,000	0.5	10,000	1.0	5,000	0.5	5,000	0.5	25,000	2.5
	15-00	Project travel (consultants/experts)	4,500		3,500		3,500		3,500		15,000	
	21-01	Subcontract (GRC)	3,000		5,000		5,000		2,000		15,000	
	21-02	Subcontract (NCUs)	4,000		15,000		4,000		2,000		25,000	
	21-03	Subcontract (RCU)	4,000		5,000		4,000		2,000		15,000	
Subtotal			20,500	0.5	38,500	1.0	21,500	0.5	14,500	0.5	95,000	2.5
GRAND TOTAL			446,500	18.0	639,500	22.9	614,000	20.3	300,000	16.8	2,000,000	78.0

E.2 CO-FINANCING AND BUDGET

Name of Co-financier (source)	Classification	Туре	Amount (US\$)	Status
Ministry of Environment and Science, Ghana	Government	In-kind	250,000	Confirmed
Federal Ministry of Environment, Nigeria	Government	In-kind In cash	250,000 900,000	Confirmed Confirmed
UNIDO	GEF Implementing/ Executing Agency	In-kind In cash	200,000 100,000	Confirmed Confirmed
GeoEnvironmental Research Centre, UK	Private	In-kind	250,000	Confirmed
Multidonors such as CIDA, Canada; DANIDA, Denmark; mining industries in Ghana, GTZ, Germany, ECOWAS, etc.	Bilateral/Multilateral agencies	in kind / in cash	150,000	to be confirmed during project implementation

Detailed Co-financing budget

	Output	Amount (US\$)
Government of	Project Coordination	100,000
Nigeria & Ghana	Policy/legal framework	100,000
(in-kind)	Regional capacity building	50,000
	Geoenvironmental Centre/Technology development	150,000
	IMS, public awareness and education	50,000
	Regional monitoring and evaluation	50,000
	Sub-total	500,000
Government of	Project Coordination	47,500
Nigeria	Regional policy	75,000
(cash)	Capacity building	75,000
	Toolkit selection of remediation technologies	312,500
	IMS	95,000
	Monitoring and evaluation	45,000
	National in-country activities such as:	
	- upgrading of office building for GRC/purchase of laboratory equipment	130,000
	- training of staff and relevant stakeholders	30,000
	 procurement of project vehicles for GRC and NCU 	40,000
	- pilot demonstration of environmentally sound remediation technologies	50,000
	Sub-total	900,000
GRC, UK	Support to international technical inputs to the project	250,000
(in-kind)		
UNIDO	Support to Regional Coordination Unit	170,000
(in-kind / cash)	Information Management System	110,000
	Miscellaneous	20,000
	Sub-total	300,000
Other donors		150,000
	GRAND TOTAL	2.100.000

SECTION F. MONITORING AND EVALUATION AND REPORTING

89. The project objectives, outputs, activities, information on experimental laboratory scale and technology selection will be reviewed and evaluated according to GEF/UNIDO project evaluation policies and procedures. Experimental scale tests and investigations results on at least 4 sites for land remediation of POPs contaminated sites in order to verify and validate the site selection methodology, the framework for remediation and the selected technology options based on BAT/BEP. Two committees, the Regional Ministerial Committee (RMC) and the Regional Steering Committee (RSC) will be meeting regularly to monitor and provide necessary coordination. The Regional Coordinator (RC) will prepare the reports of these meetings (RMC and RSC). The RC will prepare progress reports and submit to UNIDO Hqs. every three months. UNIDO Project Manager will submit a yearly Project Implementation Report (PIR) to the GEF Secretariat. The table below shows the activity and responsibility of stakeholders in reporting on project progress activities. This takes into account the technical aspects of implementation.

Type of M&E activity	Responsible parties	Timeframe	GEF (US\$)	Other (US\$)
Baseline activities report	UNIDO Project Manager (Task Manager)	3 months after the start of the project	N.A	30,000
Regional Ministerial Committee meetings report	Regional Coordinator	On biannual basis	20,000	20,000
Regional Steering Committee reports	Regional Coordinator	Twice a year	30,000	40,000
PIR	RCU/UNIDO	Once a year	0	20,000
Mid-term review report	UNIDO Project Manager, international consultant and UNIDO M&E branch	After two years of the start of the project	20,000	30,000
Terminal evaluation including financial auditing	UNIDO M&E branch and independent evaluation consultant	At the end of the project	25,000	20,000
Total			95,000	160,000

90. The mid-term review will assess the criteria used for hot spots identification, impact on stakeholders, progress of IMS and public education and the progress of the methodology for site identification/investigation/use of toolkit for appropriate technology selection as well as the review will cover the government's response to the proposed policy/legal framework. Output 6 also covers the M&E approach for both technical and logistic implementation indicators. The monitoring and evaluation GEF budget is US\$ 95,000 (excluding UNIDO staff costs, which are covered by the Agency fee). The M&E plan is given in Annex 4.

SECTION G. PRIOR OBLIGATIONS AND PREREQUISITES

- 91. The project puts emphasis on full stakeholders' involvement and hence their commitment to participation should be assured preferably in writing. The participating Government counterparts should provide all the physical facilities like office premises, conference facilities, all relevant logistics for RMC, RSC, NCU for field workshops and training courses and for information management system. These will be covered by their in-kind contribution to the project.
- 92. UNIDO should provide its office space (probably in Abuja and/or Lagos and Accra) for the establishment of the RCU with relevant support staff.

SECTION H. LEGAL CONTEXT

- 93. This project document shall be the instrument referred to the Standard Basic Agreement between the Governments of Ghana and Nigeria and UNIDO. The project objectives shall be in line with the objectives of the Policies of the Governments of Ghana and Nigeria.
- 94. The following types of revisions may be made to this Project Document with the signature of the Project Manager, provided he or she is assured that the other signatories of the Project Document have no objection to the changes:
 - Revision in, or addition of, any of the annexes of the Project Document.
 - Revisions that do not involve significant changes in the immediate subcomponents, objectives, outcomes or activities of the project, but are caused by the rearrangement of the inputs already agreed to or by cost increases due to inflation.