



GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS* THE GEF/LDCF/SCCF TRUST FUNDS

GEF ID:	4612		
Country/Region:	India		
Project Title:	POPs: India : Development and Promotion of Non-POPs alternatives to DDT		
GEF Agency:	UNIDO and UNEP	GEF Agency Project ID:	
Type of Trust Fund:	GEF Trust Fund	GEF Focal Area (s):	POPs
GEF-5 Focal Area/ LDCF/SCCF Objective (s):	CHEM-1; CHEM-1;		
Anticipated Financing PPG:	\$300,000	Project Grant:	\$10,000,000
Co-financing:	\$43,147,167	Total Project Cost:	\$53,447,167
PIF Approval:	January 26, 2012	Council Approval/Expected:	February 29, 2012
CEO Endorsement/Approval		Expected Project Start Date:	
Program Manager:	Anil Sookdeo	Agency Contact Person:	E. Galvan

Review Criteria	Questions	Secretariat Comment at PIF (PFD)/Work Program Inclusion ¹	Secretariat Comment At CEO Endorsement(FSP)/Approval (MSP)
Eligibility	1. Is the participating country eligible?	Partially. India has ratified the SC, however the NIP for India has not been Submitted to the Stockholm Convention Secretariat. Please note that if the NIP has not been submitted by the time of CEO endorsement the project will not be considered. 19/10/2011 - Inida's NIP has now been registered by the SSC. Comment cleared.	Yes
	2. Has the operational focal point endorsed the project?	Yes	

*Some questions here are to be answered only at PIF or CEO endorsement. No need to provide response in gray cells.

¹ Work Program Inclusion (WPI) applies to FSPs only . Submission of FSP PIFs will simultaneously be considered for WPI.

FSP/MSP review template: updated 11-22-2010

Review Criteria	Questions	Secretariat Comment at PIF (PFD)/Work Program Inclusion ¹	Secretariat Comment At CEO Endorsement(FSP)/Approval (MSP)
Agency's Comparative Advantage	3. Is the Agency's comparative advantage for this project clearly described and supported?	Yes	Yes
	4. If there is a non-grant instrument in the project, is the GEF Agency capable of managing it?	No	No
	5. Does the project fit into the Agency's program and staff capacity in the country?	<p>UNEP - unclear what technical staff capacity exists in The ROAP office to provide backstopping to this project. Please clarify.</p> <p>19/10/2011 - comment cleared, however if at any time project funds will be used for UNEP staff to provide services to the Government of India, there must be written authorisation from the Government of India and this must be submitted with the terminal report of the project should it be approved.</p>	Yes
Resource Availability	6. Is the proposed Grant (including the Agency fee) within the resources available from (mark all that apply):		
	• the STAR allocation?	N/A	N/A
	• the focal area allocation?	N/A	N/A
	• the LDCF under the principle of equitable access		
	• the SCCF (Adaptation or Technology Transfer)?		
	• Nagoya Protocol Investment Fund		
Project Consistency	7. Is the project aligned with the focal /multifocal areas/ LDCF/SCCF/NPIF results framework?	<p>Unclear why Outcome 1.1.2 and 1.3.1 have been identified in this project.</p> <p>19/10/2011 - these have been deleted from the PIF.</p>	Yes, the project responds to the elimination of POPs, specifically DDT in vector control.

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	8. Are the relevant GEF 5 focal/multifocal areas/LDCF/SCCF/NPIF objectives identified?	See comment above 19/10/2011 - Cleared	Yes
	9. Is the project consistent with the recipient country's national strategies and plans or reports and assessments under relevant conventions, including NPFE, NAPA, NCSA, or NAP?	No NIP submitted. 19/10/2011 - The NIP has been recorded at the SSC and the NIP identifies phase out of DDT as a priority. Comment Cleared.	Yes
	10. Does the proposal clearly articulate how the capacities developed, if any, will contribute to the sustainability of project outcomes?	No 19/10/2011 - Comment not addressed. 6/12/2011 - Comment addressed - cleared	Yes
Project Design	11. Is (are) the baseline project(s), including problem (s) that the baseline project(s) seek/s to address, sufficiently described and based on sound data and assumptions?	No. See comments in Section 30 19/10/2011 - the comment has not been addressed. The baseline situation has been described, but the baseline project that seeks to address this at a national level has not been described. The baseline project is linked with the baseline financing of the project. Without a baseline project being described the case for incremental costs cannot be made and therefore a basis for providing GEF resources to cover the incremental cost of achieving the global environmental benefits is not evident. 6/12/2011 - The baseline project has been clarified. In the elaboration of the FSP very clear descriptions of the baseline activities will need to be included in the project. - Comment Cleared	Yes

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	12. Has the cost-effectiveness been sufficiently demonstrated, including the cost-effectiveness of the project design approach as compared to alternative approaches to achieve similar benefits?		Yes
	13. Are the activities that will be financed using GEF/LDCF/SCCF funding based on incremental/additional reasoning?	<p>Cannot assess without a baseline project.</p> <p>19/10/2011 - A baseline project to address the situation described in the baseline situation has not been described. The reasoning for incremental cost have therefore not been made.</p> <p>6/12/2011- Comment addressed.</p>	Yes
	14. Is the project framework sound and sufficiently clear?	<p>No. See Comments in Section 30</p> <p>19/10/2011 - It is still unclear how the components will be implemented and what constitutes the activities to be funded from the GEF Grant.</p> <p>6/12/2011 - Comment Cleared</p>	Yes
	15. Are the applied methodology and assumptions for the description of the incremental/additional benefits sound and appropriate?	<p>No, there is no baseline described and therefore no incremental reasoning to arrive at incremental benefits.</p> <p>19/10/2011 - Comment not cleared.</p> <p>6/12/2011 - Comment cleared</p>	Yes
	16. Is there a clear description of: a) the socio-economic benefits, including gender dimensions, to be delivered by the project, and b) how will the delivery of such benefits support the	<p>See Comments in Section 30.</p> <p>19/10/2011 - The response to this leads to further concerns that the GEF is being asked to pay for non-eligible activities</p>	Yes

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	achievement of incremental/ additional benefits?	which is the replacement of other chemicals other than DDT used in other sectors. 6/12/2011 - Issues clarified in response - comment cleared	
	17. Is public participation, including CSOs and indigeneous people, taken into consideration, their role identified and addressed properly?	Yes	Yes
	18. Does the project take into account potential major risks, including the consequences of climate change and provides sufficient risk mitigation measures? (i.e., climate resilience)	Climate Change Risks should be considered with this type of project. Please see commetns in Section 30. 19/10/2011 - comment not addressed 6/12/2011 - Comment cleared	Yes
	19. Is the project consistent and properly coordinated with other related initiatives in the country or in the region?	Yes	Yes
	20. Is the project implementation/ execution arrangement adequate?	Not Defined in the PIF. Please provide. 19/10/2011 - Not addressed 6/12/2011 - Comment Addressed - cleared	Yes
	21. Is the project structure sufficiently close to what was presented at PIF, with clear justifications for changes?		Yes, Minor modifications have been made that have improved the design and clarified the roles of the two implementing agencies.
	22. If there is a non-grant instrument in the project, is there a reasonable calendar of reflows included?		N/A
	23. Is funding level for project management cost appropriate?	No. See comments in Section 30	Yes

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Project Financing	<p>24. Is the funding and co-financing per objective appropriate and adequate to achieve the expected outcomes and outputs?</p>	<p>19/10/2011 - Addressed</p> <p>No. See Comments in Section 30</p> <p>19/10/2011 - while there is an increase in the levels of co-financing and an explanation provided that there will be asset transfers without real cash flows, please clearly describe in the development and establishment of the Neem production facilities what it will cost to construct these facilities and the source of financing for this and what the TA grant from the GEF will cover.</p> <p>6/12/2011 - The clarification provided are satisfactory - comment cleared.</p>	<p>At the time of PIF review the issue of co-financing was raised. The proponents indicated in the responses to the GEFSEC review that the types would be confirmed during the PPG stage. This submission re-opens the question of adequacy of the resource package to achieve the objectives of the project. Over 75% of the co-financing package is classified as 'in-kind'. It is expected that there will be the need for sufficient cash resources to make the necessary technological changes and in this regard it appears this project cannot be implemented with the current financing package.</p> <p>Mar 25, 2015 (AS) - The response provided is adequate. The agency is requested to report on co-financing in the PIRs - Comment cleared</p>
	<p>25. At PIF: comment on the indicated cofinancing; At CEO endorsement: indicate if confirmed co-financing is provided.</p>	<p>There seems to be no real cash co-financing for this project and it is difficult to understand what 35.9 M of in kind co-financing is paying for. Even is the 9.1 M identified as unknown materialises as cash, we are very doubtful how in particular the technology transfer components will be implemented.</p> <p>Further comments in section 30.</p> <p>19/10/2011 - see additional comment in 24 above.</p>	<p>Co-financing is confirmed, however the quality of the co-financing as raised in point 24 above brings into question the ability of the financing package to achieve the objectives of this project.</p> <p>Mar 25, 2015 (AS) - comment cleared</p>

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		6/12/2011 - Comments cleared	
	26. Is the co-financing amount that the Agency is bringing to the project in line with its role?	No. 6/12/2011 - Comment cleared.	Yes
Project Monitoring and Evaluation	27. Have the appropriate Tracking Tools been included with information for all relevant indicators, as applicable?		Yes
	28. Does the proposal include a budgeted M&E Plan that monitors and measures results with indicators and targets?		Yes
Agency Responses	29. Has the Agency responded adequately to comments from:		
	• STAP?	None Received	Yes, clearance was received from the STAP on this project
	• Convention Secretariat?	None Received	
	• Council comments?		
	• Other GEF Agencies?	None Received	
Secretariat Recommendation			
Recommendation at PIF Stage	30. Is PIF clearance/approval being recommended?	<p>This PIF has major issues, both technical and financial. Please revise the PIF and re-submit before a final decision is made.</p> <p>General:</p> <p>1. The wrong template has been used. 19/10/2011 - Addressed</p> <p>Project Design:</p> <p>1. Component 2 “ Is this all TA or is there actual investment in building the manufacturing facilities. Will there be any industrial conversion/closure of the DDT manufacturing plants as a result of this project and development of</p>	

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		<p>new manufacturing technology? 19/11/2011 - comment somewhat addressed, but as indicated in section 24 above, it is unclear what is being established and how it will be financed and how the TA grant from the GEF will be used.</p> <p>2. Please describe what will be done in this activity and what constitutes the technical assistance. 19/10/2011 - the activities that constitute the technical assistance has still not been described. In fact all of the activities described in the response to this comment are investment activities for example, establishment of pilot production etc.</p> <p>3. Has an effectiveness evaluation of Neem and other Biological controls being proposed been done and an evaluation of the environmental fate of it in the environment? Has a cost benefit analysis been done to justify the use of these technologies? Is there sufficient study on the application of these botanical pesticides? Please clarify and provide these reports as well as a summary of the findings. 19/10/2011 - comment addressed</p> <p>4. How will LLIN be dealt with at the end of life? 19/10/2011 - while no conclusion on how to treat these nets at the end of life has been reached, in a country where the usage will be significant, a plan for at least collecting</p>	

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		<p>and storing of these at the end of life should be developed otherwise this will introduce additional adverse impacts on the environment.</p> <p>5. Component 3 as written is not eligible for GEF funding since this activity is not specific to replacement of DDT, however if there is already a project designed to improve the yield of the Neem Plant through tissue culture then the incremental cost for boosting the yields to compensate for replaced DDT could be considered. 19/10/2011 - the proponents have not addressed the question. The point raised in the review is that boosting of the yields is beneficial to replacing DDT, but there are also other uses for Neem which as indicated in the PIF includes agriculture etc where according to the NIP, the use of DDT has already been banned so that any benefits to other sectors needs to be financed by those sectors. We would appreciate more effort be put into the costing of these components and separating what is incremental from the baseline project.</p> <p>6. Please provide the reports made to the Stockholm Convention Secretariat and the WHO on the usage of DDT, the conditions for such use and the relevance to India's disease management strategy. 19/10/2011 - the data supplied is not the reports that India should be submitting to the Stockholm convention Secretariat. Please provide</p>	

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		<p>the data as requested.</p> <p>National Strategies:</p> <ol style="list-style-type: none"> 1. NIP should be final at time of CEO endorsement. 19/10/2011 - addressed <p>Baseline Project:</p> <ol style="list-style-type: none"> 1. No Baseline Project has been defined. Additionally the baseline project is funded from other resources but there is greater than 90% of the additional funding being in-kind and unknown. Is this realistic? For example in Component 2 there is a significant amount of co-financing being indicated but if these funds are not realized how would the component function? 19/10/2011 - the comment has not been adequately addressed as indicated in sections above. Please quantify what is meant by "a lot of cash flow" If there is cash being used please amend the co-financing tables to reflect reality. 2. Please clearly define what the baseline project is and how the GEF funding will achieve the Global Environmental Benefits through funding of incremental activities. 19/10/2011 - Not addressed. from the reponse it would appear that the baseline project is the GEF project which cannot be the case. <p>Socioeconomic Benefits:</p> <ol style="list-style-type: none"> 1. Development and promotion of non-POPs alternatives for vector control 	

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		<p>only will be acceptable under this project. How will "promotion of non-chemical means of food production ensure national food safety concerns" be a benefit of this project if the project is only designed to address vector control? Project Risks: 19/10/2011 - While this is good, the costs for replacing chemicals other than DDT should be met by the sectors that benefit from a neem based pesticide.</p> <p>1. Please identify risks to the long term outcome of this project due to climate change including changes to the vector habitats that may occur. 19/10/2011 The response does not address the question raised, which is how would change in climatic conditions impact the areas that are currently prone to malaria and would in the future new areas need to be dealt with and how the project takes this into account.</p> <p>Outline of coordination with other related initiatives:</p> <p>1. Please clarify para 16 line 3 "what is a non alternative to DDT?" - 19/10/2011 - cleared</p> <p>Project Funding:</p> <p>1. The co-financing is below what is expected. 19/10/2011 - based on the responses provided please quantify all the cash inflows into the project so that the levels per component can be evaluated. - 6/12/2011 - Cleared</p>	

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		<p>2. We have a strong concern that the majority of co-financing (>90%) is in-kind. If this is not cash then the project cannot be implemented since the baseline project should form the bulk of the project. In this regard please clearly indicate what the co-financing will be paying for. 19/10/2011 - we note that the GOI has a 52.5 million set aside for POPs, however how much of this will be used for this proeject? 6/12/2011 - Cleared</p> <p>3. Agencies were guided on a number of occasions on the level of PM costs that should be applied to projects exceeding 2M in GEF funding. The PM costs are well above this level and we request that it be reduced to the threshold or lower or a detailed justification on the costs and the reasons for the costs be provided. 19/10/2011 - Cleared</p> <p>4. Please provide a breakdown of the costs for Component 4 and what is being budgeted for in this component. 19/10/2011 - in light of the responses provided, there is triplication of effort among the three agencies. Why is a policy advocay group needed and how is this an incremental cost to phasing out DDT in India? The sharing of results should be part of the knowledge management of the agencies and the reports of the project. In this regard please remove this component.</p>	

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		<p>6/12/2011</p> <p>6/12/11 - This component should be removed as previously requested.</p> <p>19/10/2011</p> <p>There are still a large number of unanswered questions and serious concerns about the viability of this project. The proponents are requested to review carefully the entire review sheet, do additional work on quantifying the costs in the project, properly and clearly defining the baseline project and developing the incremental reasoning before resubmitting the project. A major revision of the project will be required before resubmission.</p> <p>6/12/2011</p> <p>While the PIF indicates co-financing in-kind it is clear that this will be cash from national budgets of GOI and provision of land, materails and other resources. In this regard the co-financing is clear.</p> <p>Component 4 should be removed and the overall budget should be reduced. GEF budget should be limited to 10M. Please revise accordingly.</p> <p>10/1/12 - Comment addressed - cleared</p> <p>Please provide in a separate document a</p>	

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		<p>complete breakdown by agency of the work to be done by each agency and the associated request.</p> <p>10/1/12 - Comment addressed - cleared. Additionally FAO has dropped out of the project, but the component that FAO was to implement has been taken over by UNIDO with consultation with UNEP.</p> <p>Jan 10, 2012, All comments addressed and project can be recommended</p>	
	31. Items to consider at CEO endorsement/approval.	<ol style="list-style-type: none"> 1. The description of the baseline project is clearly elaborated. 2. The quantification of the resources being put in as co-financing needs to be clearly indicated. 3. Legislative provisions for banning the production and export of DDT from India. 4. In the description of the current situation and background a detailed analysis of export of DDT to other countries, internal usage, etc must be provided. 5. Take back program for the LLIN clearly defined. - this should not be funded from GEF resources but is essential to the environmental impact of the project. 	
Recommendation at CEO Endorsement/ Approval	32. At endorsement/approval, did Agency include the progress of PPG with clear information of commitment status of the PPG?		YES
	33. Is CEO endorsement/approval being recommended?		Pending the following:

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			<p>1. The agency and proponent are to clarify how the financing package which is primarily in kind contributions will achieve the investments needed for this project.</p> <p>2. Please include a section in the proposal the responses to section 31 in the PIF review.</p> <p>Mar 25, 2016 (AS) - The comments have been adequately addressed. The project can be recommended for CEO endorsement.</p>
Review Date (s)	First review*	September 06, 2011	November 12, 2014
	Additional review (as necessary)	October 19, 2011	March 25, 2015
	Additional review (as necessary)	December 06, 2011	
	Additional review (as necessary)		
	Additional review (as necessary)		

* **This is the first time the Program Manager provides full comments for the project. Subsequent follow-up reviews should be recorded. For specific comments for each section, please insert a date after comments. Greyed areas in each section do not need comments.**

REQUEST FOR PPG APPROVAL

Review Criteria	Decision Points	Program Manager Comments
PPG Budget	1. Are the proposed activities for project preparation appropriate?	Please include an assessment of the socio-economic impacts the project will have due to change in land use planning. Also include what safeguards will be put in place to protect workers in both the cultivation aspects of the neem plant and the processing of the bio and botanical products.
	2. Is itemized budget justified?	<p>No, the amount being requested is too high, particularly with the dropping of one agency. Please revise the request to no more than 200,000.</p> <p>June 4th, 2012 - The justifications provided for maintaining the costs at the proposed level are not sufficient. The proponent may wish to provide a</p>

		quantitative justification to show the costs required. This project was approved for further development based on part on the baseline project proposed in the project. This baseline project should have been constructed with much of the data that is being proposed in the PPG.
Secretariat Recommendation	3. Is PPG approval being recommended?	<p>1. Please increase the level of co-financing of the PPG</p> <p>2. Provide how many consultants are being hired in Annex A of the PPG</p> <p>6/12/2011 - a revised PPG and response to the comments have not been provided to date.</p> <p>26/1/12 - Comments addressed.</p> <p>June 4, 2012 - The questions on the budget are not satisfactorily addressed.</p> <p>November 16, 2012 - After an extensive teleconference with the project partners and clear justifications provided in the revised PPG request it is understood that significant on the ground effort in remote areas would be required to complete the preparation of this project. There has been a 30,000 reduction in the PPG budget with is consistent with the newly approved PPG levels for projects over 10M. In this regard the PPG can be recommended.</p>
	4. Other comments	
Review Date (s)	First review*	September 06, 2011
	Additional review (as necessary)	November 16, 2012

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