Scientific and Technical Advisory Panel

The Scientific and Technical Advisory Panel, administered by UNEP, advises the Global Environment Facility (Version 5)

STAP Scientific and Technical screening of the Project Identification Form (PIF)

Date of screening: January 23, 2012 Screener: Christine Wellington-Moore

Panel member validation by: Hindrik Bouwman Consultant(s):

I. PIF Information (Copied from the PIF)
FULL SIZE PROJECT GEF TRUST FUND

GEF PROJECT ID: 4446 PROJECT DURATION: 5 COUNTRIES: Indonesia

PROJECT TITLE: Introduction of an Environmentally Sound Management and Disposal System for PCBs Wastes and PCB

Contaminated Equipment in Indonesia

GEF AGENCIES: UNIDO

OTHER EXECUTING PARTNERS: Ministry of the Environment of the Republic of Indonesia

GEF FOCAL AREA: POPs

II. STAP Advisory Response (see table below for explanation)

Based on this PIF screening, STAP's advisory response to the GEF Secretariat and GEF Agency(ies): Consent

III. Further guidance from STAP

- a) Working in the massive archipelago that is the Republic of Indonesia, with 33 provinces, in assessing the sites for gathering up of PCBs, storage sites and decontamination facility sites, there should be consideration of the risks associated with transportation between sites, as well as the site-specific contamination associated with geo/hydrological features, atmospheric conditions and any changes associated with climate change (eg changes in storm frequency, ground water aquifer levels, rainfall and drought/flood cycles etc) that may differentially impact the security of the sites in the various areas of the country. It is assumed that EIAs will be carried out in selection of sites for storage, destruction and/or decontamination activities, and that climate-resilience will be incorporated into safety guidelines developed for transport, health and safety etc. Appropriate transportation protocols also need to be developed taking into account geographical and climate risks. STAP anticipates these measures to be clearly reflected in the project document to ensure that GEF projects take the necessary measures to minimize all possible and foreseeable risks associated with a GEF-funded project.
- b) In developing the project document and determining disposal options, action should be taken to incorporate the Stockholm/Basel and GEF guidance on technology selection for POPs disposal and the overall development of the ESM system for PCBs. This would ensure that a comprehensive set of parameters be used to select technologies for GEF investment (e.g. environmental performance, ability to manage residuals and transformation products of the destruction and decontamination processes, full assessment of pre-treatment steps required and attendant associated risks, and required resources and capacities to manage them). Explicitly following the aforementioned scientific guidelines would be desirable in the course of project development, implementation, and monitoring and evaluation. This would also ensure that the true costs of a technology are brought to light since pre-destruction steps (eg. characterization of the PCB congeners to be handled, prioritization, capture and transport, containment and pre-treatment) can carry their own significant resource and capacity burdens, and can often be the barrier to implementation of technologies in developing countries and CEITs. Definition of environmentally safe low POPs concentrations would also be clearer and kept consistent with best practices.
- c) STAP is concerned with the apparent ambiguity in the second last sentence of #19 which states: "Arguably, disposal of PCBs in incinerators may be the easier option if environmental burden is taken out of the equation (generation of more toxic gases in many cases)." STAP does not think that this line of thinking should be a part of the PIF, nor the eventual thinking for the project, since GEBs will invariably be compromised should this approach be entertained.

- d) The dangers of informal, repurposed use of POPs containing containers should be included in any targeted awareness in communities. There may be a large gender component to this (eg if women do water collection and other gathering of food etc using repurposed containers).
- e) Mention is made of enhancing analytical laboratory capacity, but how this would interact with the project is not clear. STAP suggests close interaction of this to be developed capacity within relevant aspects of the project such as to ensure characterization and quantification of PCBs, EIAs, and measuring environmental levels of PCBs before, during, and after operation. Consideration should be given to monitor operator exposures. These aspects could also be incorporated in risk mitigation.
- f) STAP also suggests that this project should learn from numerous similar projects in other countries, and consider the lessons learned.
- g) STAP is also concerned about the remainder of the PCBs that will be collected and stored at "interim storage sites" (potentially 20,000 tons). Provision should be made to ensure sustainable ESM of the PCBs after completion of the project. This should include sound management of contaminated sites as well as care that in creating interim storage/collection sites, you don't inadvertently create more contaminated sites in the country.

STAP advisory		Brief explanation of advisory response and action proposed
1.	sponse Consent	STAP acknowledges that on scientific/technical grounds the concept has merit. However, STAP may
		state its views on the concept emphasising any issues that could be improved and the proponent is invited to approach STAP for advice at any time during the development of the project brief prior to submission for CEO endorsement.
2.	Minor revision required.	STAP has identified specific scientific/technical suggestions or opportunities that should be discussed with the proponent as early as possible during development of the project brief. One or more options that remain open to STAP include:
	·	 (i) Opening a dialogue between STAP and the proponent to clarify issues (ii) Setting a review point during early stage project development and agreeing terms of reference for an independent expert to be appointed to conduct this review The proponent should provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement.
3.	Major revision required	STAP proposes significant improvements or has concerns on the grounds of specified major scientific/technical omissions in the concept. If STAP provides this advisory response, a full explanation would also be provided. Normally, a STAP approved review will be mandatory prior to submission of the project brief for CEO endorsement. The proponent should provide a report of the action agreed and taken, at the time of submission of the full project brief for CEO endorsement.