



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

GEF ID:	4442		
Country/Region:	Kazakhstan		
Project Title:	NIP update, Integration of POPs into National planning and Promoting Sound Healthcare Waste Management in Kazakhstan		
GEF Agency:	UNDP	GEF Agency Project ID:	4612 (UNDP)
Type of Trust Fund:	GEF Trust Fund	GEF Focal Area (s):	POPs
GEF-5 Focal Area/ LDCF/SCCF Objective (s):	CHEM-1; CHEM-1; CHEM-3; CHEM-4; Project Mana;		
Anticipated Financing PPG:	\$0	Project Grant:	\$3,400,000
Co-financing:	\$16,011,000	Total Project Cost:	\$19,411,000
PIF Approval:		Council Approval/Expected:	
CEO Endorsement/Approval		Expected Project Start Date:	
Program Manager:	Anil Sookdeo	Agency Contact Person:	Dr. Suely Carvalho

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?	Yes	
	2. Has the operational focal point endorsed the project?	Yes	
Agency's Comparative Advantage	3. Is the Agency's comparative advantage for this project clearly described and supported?	Yes. UNDP has worked on a Global Medical Waste Project which includes mercury, and they have worked on NIP development and mainstreaming of the sound management of chemicals into national development plans.	
	4. If there is a non-grant instrument in the project, is the GEF Agency capable of managing it?	No	

*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

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	5. Does the project fit into the Agency's program and staff capacity in the country?	Yes	
Resource Availability	6. Is the proposed Grant (including the Agency fee) within the resources available from (mark all that apply):		
	• the STAR allocation?		
	• the focal area allocation?		
	• the LDCF under the principle of equitable access		
	• the SCCF (Adaptation or Technology Transfer)?		
	• Nagoya Protocol Investment Fund		
Project Consistency	7. Is the project aligned with the focal /multifocal areas/ LDCF/SCCF/NPIF results framework?	<p>Not clear at this stage. The project requires major revisions to present a coherent range of activities. The project appears to contain mainly a Health Care Waste Management Project looking at POPS and Mercury, with a number of other activities slapped on to it, in some cases like mercury inventories which are wider than the mercury in healthcare wastes.</p> <p>June 28, 2011 The project framework has been revised, focusing on the objectives of 1) NIP update (inventory for new POPs and unaddressed priority POPs); 2) conducting a country mercury assessment and developing a mercury action plan; 3) a pilot (mercury and POPs) emission reduction project in healthcare sector; and 4) Improvement</p>	

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		of national regulatory and institutional framework. Comment Cleared	
	8. Are the relevant GEF 5 focal/multifocal areas/LDCF/SCCF/NPIF objectives identified?	<p>The relevant GEF 5 focal area objectives are identified, however the indicators for SAICM in the SMC GEF 5 strategy are to measure work done on specific issues related to e-waste, lead in paints and chemicals in products.</p> <p>For the mainstreaming work, the project can be configured to fit with the approach, without requiring funding from the GEF. If specific mainstreaming activities need to be conducted such as workshops or steering committee meetings, this should be sourced from the co-financing of the project.</p> <p>June 28, 2011 Revised.</p>	
	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?	<p>The NIP of Kazakhstan has identified to some extent that u-POPs from the medical sector needs to be included in national action on the reduction of emissions of u-POPs. The data presented in the PIF goes beyond the data in the NIP, where it appears that the potential emissions were underestimated.</p> <p>The project will fit also with the ongoing discussions on mercury as understanding how to eliminate emissions of mercury from this sector is an important piece of dealing with</p>	

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		<p>mercury.</p> <p>Kazakhstan as a party to the Stockholm Convention is also required to update its NIP based on the amendment of the Convention to add nine additional chemicals.</p>	
	<p>10. Does the proposal clearly articulate how the capacities developed, if any, will contribute to the sustainability of project outcomes?</p>	<p>Yes</p>	
<p>Project Design</p>	<p>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?</p>	<p>The PIF does not describe what is the baseline situation is satisfactorily. Please elaborate on work that has been done in the past or currently to advance the some of the objectives that are being sort to be addressed by the project.</p> <p>June 28, 2011 The current revised part on baseline situation in the country touches upon the issue of underestimated emission amount in health sector, unregulated incinerator operation, improper management of medical waste situation, the lack of national capacity, and the government's attempt to develop a new national action plan on chemical conventions implementation.</p> <p>The Baseline project is still not clearly described. The part of the project funded by co-financing will mostly constitute the baseline project. The Baseline scenario is not the same as the baseline project. What has been described in the section has been the</p>	

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		<p>baseline scenario which the baseline project combined with the GEF project will address. Please revise the section to clearly delineate the two parts of the project.</p> <p>Sept 12, 2011 - The Baseline Project has still not been described. Additionally what is meant by "GEF funding will be used to support this baseline program?" at bottom of page 16.</p> <p>Please revise this section and clearly describe the baseline project.</p> <p>20/10/2011 - The baseline project has been clearly described in the revised PIF. Comment Cleared</p>	
	<p>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?</p>		
	<p>13. Are the activities that will be financed using GEF/LDCF/SCCF funding based on incremental/ additional reasoning?</p>	<p>It is not clear from the PIF, what activities are currently being undertaken that would constitute a baseline project. There is reference to work being done by the Government is currently done in a fragmented way. Please elaborate.</p> <p>Please clarify if the related activities being done are ongoing, completed.</p> <p>June 28, 2011 Same with 12</p>	

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		<p>September 12, 2011- Comment not cleared.</p> <p>20/10/2011 - Comment satisfactorily addressed. Cleared.</p>	
	<p>14. Is the project framework sound and sufficiently clear?</p>	<p>No. There are a lot of activities that are related but not properly aligned into a coherent project.</p> <p>1. It is unclear what is being proposed for work on mercury. The project appears to be a Health Care Waste Project, but then there are activities for doing a national inventory of mercury. If it is to be a national inventory then this should be properly described in the project component</p> <p>2. The components on selecting facilities to participate in the pilots would be better done during the PPG phase and not wait for the implementation phase.</p> <p>3. The mainstreaming components are not clear in terms of where this will be applied. Will it be used for a general POPs mainstreaming or specifically in the Health Care Sector? Will this project result in money being leveraged by the Government in its national budget to do further work?</p> <p>4. The project should be revised to present a clear case that incorporates the elements in the present proposal.</p>	

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		<p>June 28, 2011 Correspondingly, 1. The work on mercury is fleshed out, that is, development of a mercury inventory and the outline of a mercury reduction plan. How the work is carried out in relation to other components, such as the pilot project and NIP update, is unclear. Is it carried in parallel with NIP update(inventory for new POPs and unaddressed POPs)? 2. Addressed. 3. Addressed by removing the mainstreaming part. 4. Revised.</p> <p>20/10/2011 - All comments addressed - Cleared</p>	
	15. Are the applied methodology and assumptions for the description of the incremental/additional benefits sound and appropriate?	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 achievement of incremental/additional benefits?	Yes	
	17. Is public participation, including CSOs and indigeneous people, taken into consideration, their role identified and addressed properly?	Yes	

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	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)	Yes	
	19. Is the project consistent and properly coordinated with other related initiatives in the country or in the region?	Yes	
	20. Is the project implementation/ execution arrangement adequate?	Yes	
	21. Is the project structure sufficiently close to what was presented at PIF, with clear justifications for changes?		
	22. If there is a non-grant instrument in the project, is there a reasonable calendar of reflows included?		
Project Financing	23. Is funding level for project management cost appropriate?	<p>The Project Management cost is within the acceptable range, however the co-financing for this component is not adequate.</p> <p>July 15, 2011</p> <p>Please note that the GEF Secretariat's email of June 17, 2011 on Project Management costs apply to PIFs not yet approved. In this regard please justify the need for Project Management Costs over the 5% threshold for projects requesting more than 2 Million from the GEF Trust Fund.</p> <p>September 12, 2011</p>	

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		<p>Please clarify what the communications costs entail. Also please indicate how many staff and approximate rate per person is being used to arrive at these figures.</p> <p>November 17, 2011</p> <p>The Project Management costs are within acceptable limits at the PIF stage.</p>	
	<p>24. Is the funding and co-financing per objective appropriate and adequate to achieve the expected outcomes and outputs?</p>	<p>Unable to determine at this stage. Dis-aggregation of costs is required.</p> <p>July 15, 2011</p> <p>Will be assessed once the baseline project is clearly elaborated.</p> <p>September 12, 2011 - Still pending. Please note this section will be addressed once there is a clear baseline project.</p> <p>Thanks for the breakdown of the NIP update component, please note that since the NIP update will not be done through direct access, the agency fee must be deducted from the cost of the component, in this case since 250,000 is being requested, the activities should only total 225,000 since the agency fee of 10% will need to be deducted from the total. Please revise these figures and the figures in the overall cost tables A and B.</p> <p>20/10/2011 - Addressed - Cleared</p>	

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	<p>25. At PIF: comment on the indicated cofinancing; At CEO endorsement: indicate if confirmed co-financing is provided.</p>	<p>The major co-financing is not confirmed.</p> <p>June 28, 2011</p> <p>While the co-financing is not confirmed the type should be approxiamtely known at this stage. At the current point only 15% of co-financing is cash and this is of concern of the ability to implement all the components of the project.</p> <p>Sept 12, 2011 - comment has not been addressed satisfactorily. It is of concern that without sufficient cash co-financing linked to the baseline project that the activities will not be able to be implemented.</p> <p>20/10/2011 - the co-fiancing has been clearly identified and within the range expected.</p>	
	<p>26. Is the co-financing amount that the Agency is bringing to the project in line with its role?</p>	<p>Please clarify what in-kind support will be provided.</p> <p>28/06/2011- UNDP has clarified this satisfactorily. Comment Cleared</p>	
Project Monitoring and Evaluation	<p>27. Have the appropriate Tracking Tools been included with information for all relevant indicators, as applicable?</p>		
	<p>28. Does the proposal include a budgeted M&E Plan that monitors and measures results with indicators and targets?</p>		Yes
Agency Responses	<p>29. Has the Agency responded adequately to comments from:</p>		
	<ul style="list-style-type: none"> • STAP? 	None Received	

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	<ul style="list-style-type: none"> • Convention Secretariat? 	None Received	
	<ul style="list-style-type: none"> • Council comments? 		None Received
	<ul style="list-style-type: none"> • Other GEF Agencies? 	None Received	
Secretariat Recommendation			
Recommendation at PIF Stage	<p>30. Is PIF clearance/approval being recommended?</p>	<p>Further clarification and major revisions are required for this project before a recommendation can be made.</p> <p>1. There are a number of issues with this project and clarification is required on the following:</p> <ul style="list-style-type: none"> - The Mercury outcome 3 in the project framework does not seem to be directly related to the mercury tracking and mercury issues in the Health Care Sector. Is a wider project on mercury inventory being envisioned and if so, would it be better to do a separate project on this or better articulate this in the current project where for example the mercury inventory can be done including in the health care sector and a demonstration to dealing with mercury in the Health care sector be done along with improvement of emissions of POPs etc? - Output 4.1 is also unclear as to what will be done here. The UNDP-UNEP PI on SMC has already developed and demonstrated outcome 4, so is the intention here to re-do such a method or to use the toolkit to mainstream POPs into the development plans. If this is the case and the 	

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		<p>intention is also to leverage funding for POPs and chemicals management then the activity may be considered to be done at the stage of the PPG so that co-financing can be finalized and ensure a project that has the by in of stakeholders.</p> <ul style="list-style-type: none"> - Please note the upper limit for NIP updates is 250,000 USD. - The use of Economic Valuation for priority setting should be done prior to project development since this will provide the basis of what actions are needed on a priority basis. This type of activity should be more appropriately done at the stage of the development of the NIP and it is unclear how doing this activity now will achieve improvements in the health care sector in regard to the reduction of POPs. - There are a number of activities that would be better done during the PPG phase including selection of facilities to implement the Health Care Waste Management and choice of technology to be deployed etc. <p>2. There are too many unrelated activities to make this a cohesive project. There are conceivably three projects in here. The NIP update, a mercury project with activities related to inventory and including work on handling and storage in the Healthcare</p>	

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		<p>Sector which can include activities on reduction of POPS from this sector through better handling of waste. The third project should be reconsidered.</p> <p>3. Overall the way the project is described in the project framework makes it difficult to see how the project will work. It may be better for example to consider looking at the NIP again and see that in there the priority for the u-POPS is to first inventory them. Also since mercury data is a priority in the mercury strategy an overall inventory program could be considered and then managment of a sector where there is an intersection fo u-POPs, new POPs and mercury such as the health care sector can be looked at to acheive reductions of these issues in a cost effective manner. If one of the activities is inventories then this will also serve the purpose of the NIP update to get an indication of what new POPs exist.</p> <p>June 28, 2011 The project framework has been revised, focusing on the objectives: NIP update (inventory for new POPs and unaddressed priority POPs); conducting a country mercury assessment and developing a mercury action plan; Improvement of national regulatory and institutional framework; and a pilot (mercury and POPs) emission reduction project in healthcare sector. The idea of creating cost-effectiveness is</p>	

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		<p>encouraged, yet how these objectives combined together are aligned into a coherent project is unclear. For instance, how the development of a national mercury inventory and reduction plan can be carried out in relation to the pilot project in healthcare sector or NIP update.</p> <p>In addition, there is a lack of a systemic description of specific work on the ground which has been completed in the past as baseline foundation for GEF to build on.</p> <p>Large part of co-financing needs further confirmation.</p> <p>July 15, 2011</p> <p>The project has been improved, however there are still some technical issues and financial issues that needs to be addressed before a final decision can be made.</p> <p>Technical Issues:</p> <ol style="list-style-type: none"> 1. In Component 1.2.1, what type of support will be provided to the Center for Chemical Safety? 2. In the discussion of the current situation in Kazakhstan, there is an indication that mercury lamps from hospitals are not properly disposed. Please note that UNDP is already developing a project on Energy Efficient Lighting in Kazakhstan that includes development of appropriate regulations 	

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		<p>and legislation to deal with the disposal of mercury lamps. In this regard activity related to mercury containing lamps should be covered by the other project but the two projects need to be coordinated. How this will be done needs to be elaborated at CEO endorsement.</p> <p>3. The Baseline project is still not clearly described. The part of the project funded by co-financing will mostly constitute the baseline project. The Baseline scenario is not the same as the baseline project. What has been described in the section has been the baseline scenario which the baseline project combined with the GEF project will address. Please revise the section to clearly delineate the two parts of the project.</p> <p>Financing Issues:</p> <p>1. The ratio of co-financing is too low, additionally only 15% of the total co-financing appears to be cash.</p> <p>2. Please note that the GEF Secretariat's email of June 17, 2011 on Project Management costs apply to PIFs not yet approved. In this regard please justify the need for Project Management Costs over the 5% threshold for projects requesting more than 2 Million from the GEF Trust Fund.</p> <p>3. In our previous review we indicated that the NIP Updates can be up to 250,000. This amount is being requested; however there is no</p>	

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		<p>justification for requesting the full amount. Please provide an indicative list of activities and the approximate budget for this activity. You may want to refer to the templates on the NIP updates available on the GEF website.</p> <p>September 12, 2011 - the PIF has gained from more consultation with the project proponents how major issues related to the design of the baseline project and the related incremental reasoning have not been addressed sufficiently. There appears to be more detail in this version of the PIF, however the description in the baseline project section does not give a coherent picture of the baseline project. We recommend that this be completely revised, with a clear description of the activities that are funded from co-financing which will make the incremental arguments clearer.</p> <p>The justification of the PM cost is also not sufficient. Please see the comments realted above in section 23.</p> <p>The co-financing levels remain lower than expected and is primarily in-kind which makes a weak argument for financing this project. Some addtional consultation with the proponents would be helpful to resolve this.</p> <p>17/11/2011 - All comments have been addressed and the project is being recommended for CEO clearance</p>	

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	31. Items to consider at CEO endorsement/approval.		
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?		
	33. Is CEO endorsement/approval being recommended?		
Review Date (s)	First review*	March 18, 2011	
	Additional review (as necessary)	September 12, 2011	
	Additional review (as necessary)	November 17, 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?	Yes
	2. Is itemized budget justified?	Yes
Secretariat Recommendation	3. Is PPG approval being recommended?	Yes
	4. Other comments	
Review Date (s)	First review*	November 17, 2011
	Additional review (as necessary)	

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