



# PROJECT IDENTIFICATION FORM (PIF)

PROJECT TYPE: Full-sized Project

THE GEF TRUST FUND

Submission Date: August 13, 2009

Resubmission: September 14, 2009

## PART I: PROJECT IDENTIFICATION

GEF PROJECT ID<sup>1</sup>: PROJECT DURATION: 4 years

GEF AGENCY PROJECT ID: P113173

COUNTRY(IES): Nigeria

PROJECT TITLE: PCB management and disposal project

GEF AGENCY(IES): World Bank

OTHER EXECUTING PARTNER(S): FEDERAL MINISTRY OF ENVIRONMENT, NIGERIA

GEF FOCAL AREA (S)<sup>2</sup>: Persistent Organic Pollutants

GEF-4 STRATEGIC PROGRAM(S): POPs-SP1, POPs-SP2

NAME OF PARENT PROGRAM/UMBRELLA PROJECT (if applicable):

NA

INDICATIVE CALENDAR*	
Milestones	Expected Dates mm/dd/yyyy
Work Program (for FSP)	November 2009
CEO Endorsement/Approval	April 2010
Agency Approval Date	May 2010
Implementation Start	November 2010
Mid-term Evaluation (if planned)	November 2012
Project Closing Date	November 2014

\* See guidelines for definition of milestones.

## A. PROJECT FRAMEWORK

**Project Objective:** To improve public health and environmental quality by avoiding the environmental release of PCBs from on-line and off-line electrical equipment and ensuring sound management and safe disposal of PCB and PCB-containing equipment.

Project Components	Indicate whether Investment, TA, or STA <sup>b</sup>	Expected Outcomes	Expected Outputs	Indicative GEF Financing <sup>a</sup>		Indicative Co-Financing <sup>a</sup>		Total (\$) c = a + b
				(\$ a)	%	(\$ b)	%	
<p><i>Component 1:</i> Capacity Building for PCB Management</p> <p><i>SC1a:</i> Policy, Regulatory and institutional review and strengthening</p> <p><i>SC1b:</i> Training and Public Awareness</p>	TA	<ul style="list-style-type: none"> <li>Revised legal framework including provisions for safe management of PCBs.</li> <li>Increased capacity at FMOE and PHCN for the management of PCBs.</li> </ul>	<ul style="list-style-type: none"> <li>Specific regulations addressing PCBs</li> <li>Technical staff in pollution department and PHCN environment unit with knowledge of PCB management</li> <li>Training of government officials and other stakeholders on sound management of PCBs</li> <li>Public awareness campaign launched for sound management of PCBs</li> </ul>	600,000	43	800,000	57	1,400,000
<p><i>Component 2:</i> Design, Development and Implementation of Environmental Sound Management (ESM) for on-line and off-line equipment</p>	TA / Investment	<ul style="list-style-type: none"> <li>Development of guidelines for sound and sustainable management of on and off-line PCB-contaminated equipment.</li> </ul> <p>Sound PCB management and</p>	<ul style="list-style-type: none"> <li>Development of guidelines for the identification of PCB-containing equipment, labeling electrical equipment and good maintenance practices</li> <li>Identification and upgrading of</li> </ul>	3,000,000	34	5,900,000	66	8,900,000

<sup>1</sup> Project ID number will be assigned by GEFSEC.

<sup>2</sup> Select only those focal areas from which GEF financing is requested.

		containment at selected pilot sites  Increased capacities of the existing laboratories	laboratories for testing PCBs <ul style="list-style-type: none"> <li>• Development of guidelines for transporting and handling of PCB containing oils from one location to the other</li> <li>• Identification and enhancement of possible interim storage locations</li> <li>• Oil recycling and transformer maintenance guidelines</li> <li>• Development of strategies for PCB management and containment including demonstration pilots</li> <li>• Development of infrastructure at the selected demonstration sites</li> </ul>					
<i>Component 3: Baseline national inventory of PCBs and development of national PCB management plan</i>	Investment	- Reliable and detailed national PCB inventory. - Management plan for on-line equipment developed - Management plan with assessment of disposal options for off-line equipment and PCB waste oils developed	<ul style="list-style-type: none"> <li>• Majority of off-line transformers and waste oils identified and stored until final disposal.</li> <li>• Majority of on-line PCB-containing equipment identified, safeguards and monitored until final decommissioning</li> </ul>	1,600,000	31	3,500,000	69	5,100,000
<i>Component 4: Monitoring and Evaluation</i>	TA	Established M&E system for sound PCB management	<ul style="list-style-type: none"> <li>• M&amp;E through out the project life and dissemination of information to national and local stakeholders</li> <li>• Active PCB tracking with well functioning PCB management information system</li> </ul>	400,000	31	900,000	69	1,300,000
<i>Component 5: Project Management</i>	Project management			700,000	39	1,100,000	61	1,800,000
<b>Total project costs</b>				<b>6,300,000</b>		<b>12,200,000</b>		<b>18,500,000</b>

<sup>a</sup> List the \$ by project components. The percentage is the share of GEF and Co-financing respectively of the total amount for the component.

<sup>b</sup> TA = Technical Assistance; STA = Scientific & Technical Analysis.

**B. INDICATIVE CO-FINANCING FOR THE PROJECT BY SOURCE and by NAME** (in parenthesis) if available, (\$)

Sources of Co-financing	Type of Co-financing	Project
Project Government Contribution	cash	7,000,000
Project Government Contribution	In-kind	5,000,000
Private Sector	cash	0
Private Sector	In-kind	200,000
<b>Total Co-financing</b>		<b>12,200,000</b>

**C. INDICATIVE FINANCING PLAN SUMMARY FOR THE PROJECT (\$)**

	Previous Project Preparation Amount (a)	Project (b)	Total c = a + b	Agency Fee
GEF financing		6,300,000	6,300,000	630,000
Co-financing		12,200,000	12,200,000	
<b>Total</b>	<b>0</b>	<b>18,500,000</b>	<b>18,500,000</b>	<b>630,000</b>

**D. GEF RESOURCES REQUESTED BY AGENCY (IES), FOCAL AREA(S) AND COUNTRY(IES)<sup>1</sup>**

Not applicable.

**PART II: PROJECT JUSTIFICATION**

**A. STATE THE ISSUE, HOW THE PROJECT SEEKS TO ADDRESS IT, AND THE EXPECTED GLOBAL ENVIRONMENTAL BENEFITS TO BE DELIVERED:**

Nigeria signed the Stockholm Convention in May 2001 and ratified the treaty in May 2004. After the signature in 2001, the Government requested and received financial assistance from the Global Environment Facility (GEF) through the United Nations Industrial Development Organization (UNIDO), in the form of a US\$ 499,000 GEF POPs Enabling Activity (EA) grant to finance the preparation of its NIP. Given the size of the country, its level of economic development and its complex government structure, and taking into account the amount of GEF resources available, the level of detail that could have been expected from inventories developed under the NIP was limited.

The POPS/PCB inventory, as proposed by UNIDO was completed, but very limited information on volumes of PCB stocks or on numbers of PCB-containing equipment is actually available. Most of the data compiled were provided by 10 transmission stations of the Power Holding Company of Nigeria (PHCN) in six states of the North Central Zone and in the Federal Capital Territory. The report does not provide any indication of why those particular states were selected or whether they are representative of the national context. In addition, no information was included regarding privately owned equipment. From the report, only 22 transformers were identified, most of which range in ages from 15 to 30 years. No testing was conducted on the transformer oils. No data regarding other types of equipment (e.g. capacitors) are included in the report. Anecdotal information is presented on PCB spills, PCB contaminated soils and groundwater and PCB stocks at some of the transmission stations, but no supporting data are included.

In spite of the inadequacy of the existing PCB survey conducted under the GEF project, The Government of Nigeria has highlighted PCB management as one of its top priorities regarding POPs due to several reasons:

- a) The Nigeria electricity sector has facilities located in all 36 states including the Federal Capital Territory. It is likely that many of these transformers contain PCBs and that a significant number of them may not be providing adequate containment for the oils. The Federal Ministry of Environment (FMOE) is therefore very concerned about the potential harm this equipment might be posing to the health of people living and working nearby PHCN facilities, as well as the environment.
- b) One of the present Government's top priorities is to upgrade up to 10,000 MW of its installed power capacity, at a cost of up to US\$10 billion. Some of the upgrades will involve replacement of old equipment, which may be contaminated with PCBs. It is therefore critical for the government to have a clearer picture of what is the

potential for contamination of PHCN's electrical equipment such that plans to adequately manage the decommissioning of this equipment can be put in place.

- c) The risks to human health and to the environment posed by the unsound management of privately owned PCB-containing equipment or PCB stocks are also a priority of the government. Compiling data about these issues will allow to plan better the level of government enforcement of private sector operations that will be required to ensure human health and environmental safety.

In 2008, the Nigerian Government undertook a more detailed analysis of PCB situation in the power generating facilities in the country with financial support to the amount of 250,000 Canadian Dollars from the World Bank (using funds from the Canadian POPs Trust Fund). The main conclusions and recommendations of the study, which covered only an estimated 10% of the potentially contaminated electrical equipment, are summarized below:

- The pieces of equipment inventoried are distributed across 10 out of 36 states (including the Federal Capital Territory) of the Country.
- PHCN is the greatest user of dielectric fluid in Nigeria and there were no records found of historical PCB wastes. Dielectric fluids are used and re-used and not disposed of as wastes.
- Awareness about PCB use in transformer oil is very low and consequently there is a lack of proper procedures in its handling, storage and disposal.
- The total amount of PCB-contaminated waste in Nigeria is estimated to be 3,400 tonnes. This figure was obtained on the basis of very conservative assumptions. The total amount is expected to be much greater. No regulatory framework exists for the management and disposal of PCBs and no tracking of PCB oils or contaminated equipment is carried out. PCB-free oils are mixed with contaminated oils during regular maintenance and recycling procedures, potentially contaminating an even greater number of pieces of equipment
- A more comprehensive and expanded PCBs Inventory covering the entire country and all users of dielectric fluids is required.
- The Government should develop and implement a regulation respecting PCBs to control the use, handling, storage and disposal of PCBs and PCB-contaminated equipment and oil.
- Once the Government of Nigeria (GON) has implemented PCB management regulations, PCB-containing electrical equipment can be removed from service for disposal by the Stockholm Convention deadline of 2025.
- While it is acknowledged that 80 % of the transformers in use in Nigeria still have significant useful life, those contaminated with PCBs may be disposed of in advance of the Stockholm Convention timeline requirements, if they are found to pose threats to human health or the environment.

The overall goal of the proposed project is to improve public health and environmental quality by avoiding the environmental release of PCBs from on-line and off-line electrical equipment and ensuring sound management and safe disposal of PCB and PCB-containing equipment. The specific objective is to build capacity for environmentally sound management of PCBs, and the main outcomes of the project will include (i) increase awareness among key stakeholders and the general public, (ii) improved regulations, (iii) enhanced physical facilities management of PCBs and PCB-containing equipment and (iv) improved national capacity to manage PCBs in an efficient and environmentally sound manner. The components include:

1. *Capacity building for PCB Management:* This component is subdivided into two sub-components:

(i) *Policy, regulatory and institutional review and strengthening* - There is no comprehensive national law on chemicals in Nigeria. The existing national legislations relevant to chemicals management are too general, fragmented and not specific to POPs especially PCBs. The proposed project will aim at strengthening the Nigerian Government's ability to monitor, control and ultimately phase out the use of PCBs in electrical equipment. Activities will include a comprehensive review of current hazardous waste management regulations, and the development of proposed revisions to this framework that will specifically address PCBs. Roles and responsibilities of various government agencies and other stakeholders for the monitoring, management and final disposal of PCB oils and contaminated equipment will be clearly delineated. Also, an assessment will be conducted of the existing capacity at the Federal Ministry of Environment (FMOE) and other

relevant agencies to adequately oversee the national management of PCBs, and recommendations will be made on actions needed to strengthen that capacity.

(ii) *Training and public awareness* - Public awareness will involve the preparation and dissemination of training and awareness raising materials; and would essentially include TV programs / documentaries, posters and the production of brochures/pamphlets for raising public awareness of PCBs issues.

2. *Design, development and implementation of Environmentally Sound Management (ESM) for on-line and off-line equipment and potentially contaminated sites*

This will involve a series of investment activities that will better prepare the government to handle PCBs in the future; and consist of:

(i) *Development of procedures, manuals, management protocols and guidelines for the identification of PCB-containing equipment, labeling electrical equipment and good maintenance practices* – Guidelines and procedures will be made available, to be used as activities under Components 2 and 3 are implemented.

(ii) *Identification and upgrading of laboratories for testing PCBs in oils, water and soils samples* – Very limited analytical capacity exists in Nigeria to carry out testing of potentially contaminated PCB samples, which complicates even further efforts to diagnose the magnitude of the contamination problem. Activities under this component will assess existing laboratories and will upgrade equipment and testing procedures, in order to set up local facilities that will be available in the future, as inventories and site characterization efforts are conducted.

(iii) *Identification and enhancement of possible interim storage locations so as to meet the requirements for environmentally sound and safe storages of PCBs wastes/oils and PCB-containing equipment* – As treatment and final disposal of PCB-containing materials are not considered as part of this project, existing locations like the ijora workshop in Lagos and sub-stations at Alagbon, Ikeja, Kaduna, Oji river and Minna will be visited and assessed for their suitability as interim storage locations; and if possible upgrading and enhancement procedures and options will be discussed with Government; as it is very probable the these storage facilities may need to be upgraded to prevent PCB contamination. The interim storage locations will exist on a temporary basis until an effective treatment and disposal plan is available

(iv) *Waste oil management and transformer maintenance guidelines* - Current and past electrical equipment maintenance practices in Nigeria have not been regulated or monitored, therefore allowing for mixing dielectric fluids from different pieces of equipment. Recent inventory results showed it is possible that a large number of pieces of electrical equipment, regardless of their manufacturing date, may have been cross-contaminated with PCBs. Activities under this subcomponent will focus on developing, putting in place and monitoring guidelines for waste oil management and maintenance of electrical equipment, such that will prevent further cross-contamination

(v) *Development of strategies for PCB management and containment at the national level* - This component aims to evolve strategies for PCB management and containment as well as demonstration pilots in selected sites. The demonstration will cover activities such as identification of PCB-containing oils, equipment and wastes; conduct oil and soil sampling and testing to determine level of PCB contamination; and examine PCB management practices and capacity at the sites.

(vi) *Development of guidelines for characterization and risk management of contaminated sites* – A number of sites have been identified around the country, where PCB containing equipment were discarded, for years, without following any type of precaution. No investigations have been conducted to ascertain the level of contamination at these sites, and no management plans have been

conceived. Activities under this subcomponent would consist of the development of basic contaminated site characterization and risk assessment guidelines, which would allow the government to prioritize sites according to their potential impacts on human health and the environment and to select risk management alternatives accordingly.

### *3. Baseline national inventory of PCBs and PCB-containing equipment and development of a national PCB management plan.*

This component will build on the recently concluded partial PCB inventory study that covered 10 states funded by the World Bank with support from the Canadian Trust funds for POPs. The proposed project will establish a database of PCB containing equipment in 15 additional states and develop the methodology for a comprehensive study and guidelines/procedures that Government will follow to cover the remaining 11 states and the Federal Capital Territory (FCT) in the future. This will include sampling and testing of potentially contaminated equipment owned by the electricity sector, as well as by other economic sectors that have never been controlled. Results from this inventory will provide a clearer picture of the extent of PCB contamination in electrical equipment across the country, on the basis of which, a long-term PCB management plan will be developed. The management plan that is envisioned will consist of a cost-effective schedule to phase out all potentially contaminated on-line equipment, in a manner consistent to the targets of the Stockholm Convention, and according to, among other factors, age of equipment, level of risk, location, capacity, and ownership.

The management plan will also include an assessment of disposal options for off-line equipment and PCB waste oils. Safeguarding, storage and disposal options will be evaluated for equipment and contaminated oils that are currently in storage, as well as those which will be taken off-line in the future and until 2025. A long-term plan, which will include options for financing the costs of disposal, will be developed. The overall PCB management plan will be developed in conjunction with PHCN.

### *4. Monitoring and Evaluation*

This component will support activities to monitor progress of project implementation and to evaluate effectiveness of project activities. The M&E tools to be developed under the project are expected to be institutionalized for the management of all PCBs in Nigeria.

### *5. Project Management*

The component will finance costs related to the establishment of the Project Management Unit (PMU) and incremental operating costs of the PMU. In addition, this component will ensure an effective and timely project management, coordination and the set-up of a project performance monitoring system, all of which are pre-requisites for successful project implementation.

## **B. DESCRIBE THE CONSISTENCY OF THE PROJECT WITH NATIONAL/REGIONAL PRIORITIES/PLANS:**

Nigeria became a Party to the Stockholm Convention in May 2004 and completed its NIP in early 2009. The top national priorities identified in the NIP included strengthening institutional and regulatory capacity for the management of POPs, increasing public awareness, and reducing/eliminating releases of intentionally produced POPs - particularly PCBs. These national priorities are well reflected in the various components of this proposed Project.

The proposed project is consistent with the following Government policy documents: the seven point agenda and vision 2020 with special attention to pollution prevention, abatement, remediation and management theme. The proposed project also fits well within the context of Nigeria's Electric Power Sector Reform legislation (enacted in March 2005), of the ongoing IDA assistance to the power sector, and more specifically, it is well aligned with the objectives of the recently approved US\$ 200 million Nigeria Electricity and Gas Improvement Project (NEGIP). The proposed GEF project is therefore very timely, as it will focus primarily in strengthening the Government's capacity for PCB management, ensuring that appropriate measures are taken, consistently throughout the country, as the power sector reform and the

NEGIP are carried out. In that sense, the proposed GEF project is fully complementary and will directly support the objectives of the NEGIP.

The proposed Project will build upon the work carried out by the GON and supported by GEF-UNIDO and World Bank (through the Canadian Trust fund for POPs). The ultimate impact will be the reduction and prevention of POPs releases to the global environment, specifically PCBs. With enhanced PCB management capacity and demonstrated approaches to reduce and/or eliminate exposure risks from existing sources of PCBs, Nigeria will be on track to meeting its obligations under the Stockholm Convention, for its priority chemical.

**C. DESCRIBE THE CONSISTENCY OF THE PROJECT WITH GEF STRATEGIES AND STRATEGIC PROGRAMS:**

The proposed Project is fully aligned with GEF strategic programs under the POPs focal area. Specifically, the Project will: (i) strengthen the government's technical capacity for NIP implementation, at the FMOE, PHCN and other relevant agencies; and (ii) provide the GON technical and financial assistance to respond to the top priorities identified in the NIP in terms of PCBs and public awareness.

The proposed project is also consistent with the GEF's Sound Chemicals Management Framework Strategy. The strengthening of regulatory and institutional capacity to integrate PCB management into the current framework for management of hazardous wastes will allow the government to consistently address other chemical pollutants.

**D. JUSTIFY THE TYPE OF FINANCING SUPPORT PROVIDED WITH THE GEF RESOURCES:**

Grant resources will be provided to the government and to public utility companies to partially cover the costs long-term management and disposal of private and publically-owned, PCB-contaminated oils and electrical equipment. Grant financing will also be provided to increase the level of public awareness on issues involving PCBs, a top priority of the government as per the NIP and the recently concluded study financed by the Canadian Trust fund on POPs. In the absence of these grant resources and of the associated technical assistance, it is unlikely that the GON will be financially able to meet its commitments under the Stockholm Convention.

**E. OUTLINE THE COORDINATION WITH OTHER RELATED INITIATIVES:**

The proposed project will collaborate with the following projects: African Stockpiles Programme (ASP); GEF- UNIDO regional project (involving Ghana and Nigeria) to develop appropriate strategies for identifying sites contaminated by chemicals listed in Annexes A, B and/or C of the Stockholm Convention; and the just approved Nigeria Electricity and Gas Improvement Project (NEGIP). Details on coordination and drawing complementarities with ongoing initiatives will be analyzed during project preparation and elaborated at CEO endorsement.

**F. DISCUSS THE VALUE-ADDED OF GEF INVOLVEMENT IN THE PROJECT DEMONSTRATED THROUGH INCREMENTAL REASONING :**

Under the baseline scenario, the lack of a regulatory framework that addresses PCBs will greatly hamper the government's ability to phase out all PCB contaminated equipment by 2025, in line with the targets of the Stockholm Convention. The national PCB inventory is incomplete, public awareness about the risks of PCBs is low, and little institutional capacity exists at the government level or within the power utility company-PHCN to put in place environmentally sound practices for the management and disposal of PCBs. This is the case even though evidence shows that existing management practices for PCB oils have not prevented cross contamination of originally PCB-free equipment, and that spills and leaks from PCB-contaminated equipment have occurred across the country, with potentially severe impacts on human health and the environment. Under this current scenario, no incentives exist for public or private owners of electrical equipment to prevent any further cross contamination, to assess current levels of contamination of their equipment, nor to put in place measures that would ensure its safe handling.

Under the baseline scenario, no management plan will be developed in the medium term to schedule the removal of contaminated on-line equipment in a feasible and cost effective manner, and no resources will be available for assessing disposal alternatives for PCB-contaminated oils and electrical equipment that will be taken off-line in the future. Procedures for draining, repackaging, safeguarding and storing potentially substantial volumes of PCBs, for indefinite lengths of time, will likely not be developed, and PCB spills and leakages will continue to occur at storage sites and repair shops, posing significant risks to employees and to the overall environment.

Under the alternative scenario, project resources will be used to update the regulatory framework in order to control, manage and ultimately eliminate the use of PCB-containing equipment, in line with Nigeria’s commitment to the Stockholm Convention. The Project will strengthen capacity, both in the public and private sectors in the use of adequate procedures for the safe-handling and disposal of off-line PCB-contaminated equipment and PCB oils. The project will also develop a management plan that will ultimately lead to the decommissioning of all on-line PCB-contaminated equipment, by 2025.

Furthermore, with little assistance from the GEF but within the context of this Project, the GON will be able to leverage resources to address an issue of highest priority, namely the management of PCB contaminated sites. Though exact locations and sites are not known, sites around the country are known to have been polluted with PCBs and represent high risks to the environment and the surrounding populations. This project will develop procedures to systematically evaluate and manage environmental and human health risks posed by these sites. The government will demonstrate management alternatives for contaminated sites that will reduce overall risks, and taking advantage of the increased exposure and awareness generated by the project, hopes to put in place a plan to address all of the identified hotspots.

**G. INDICATE RISKS, INCLUDING CLIMATE CHANGE RISKS, THAT MIGHT PREVENT THE PROJECT OBJECTIVE(S) FROM BEING ACHIEVED, AND IF POSSIBLE INCLUDING RISK MITIGATION MEASURES THAT WILL BE TAKEN:**

<b>Risk</b>	<b>Rating</b>	<b>Risk Mitigation measures</b>
Lack of capacity by the PMU at the Federal Ministry of Environment to coordinate project activities, and thus project implementation will might be slow	M	A well defined project management system will be followed including the selection of skilled individuals
Regular payment of counterpart funds: Government has not systematically meets its counterpart contribution in previous projects	H	During the identification mission, the minister of environment promised to pay promptly and has made a provision for co-financing to be included in the current Federal budget. A letter to that is in the process of being sent to the Bank
Possibility of inadequate and ineffective stakeholder participation	M	Right from the Canadian Trust fund study on the PCB baseline and the identification mission, wide partnership and consultations were held. The project will continue on this manner in order to mobilize the widest stakeholder participation
Failure to properly identify and find all PCB sites and equipment	M	Detailed inventories will be complemented by awareness campaigns to encourage the public and key stakeholders to disclose locations of PCB sites and equipment
Procurement and financial management risks: Insufficient knowledge and experience with Bank procurement may cause delays in project implementation	M	Procurement and FM training will be provided to key staff during implementation; experienced procurement and FM specialists will be hired to assist the PMU; intensive supervision of PMU staff by the Bank’s country office procurement and FM experts

**H. DESCRIBE, IF POSSIBLE, THE EXPECTED COST-EFFECTIVENESS OF THE PROJECT:**

The project cost-effectiveness will be determined during project preparation based on the estimated PCBs to be managed, collected and disposed. The project will achieve the desired outputs in a cost-effective manner. During the project’s development period, more information will be collected for calculating the cost effectiveness and this information will be presented in the proposal at CEO endorsement.

**I. JUSTIFY THE COMPARATIVE ADVANTAGE OF GEF AGENCY:**

Under the GEF IV, the World Bank has demonstrated its ability to manage complex, multi-stakeholder investment projects under the POPs focal area, in particular on PCB management and elimination in China and Moldova. Relevant lessons learned from implementation of those projects will be built-in to the design of this Project. Moreover, more than 75% of the GEF resources requested for this project will finance investment activities, which fall within the comparative advantage of the World Bank. The remaining resources will be used to finance strengthening of regulatory frameworks, capacity building and awareness raising, all critical project components that, in the interest of sustainability, cannot be excluded from the overall approach. These elements reinforce the Bank’s goal of promoting institution strengthening, infrastructure development and policy reform.



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


**A. RECORD OF ENDORSEMENT OF GEF OPERATIONAL FOCAL POINT (S) ON BEHALF OF THE GOVERNMENT(S):**

(Please attach the [country endorsement letter\(s\)](#) or [regional endorsement letter\(s\)](#) with this template).

NAME	POSITION	MINISTRY	DATE
M.S. Umar Kalgo	Director	Federal Ministry of Environment	<b>AUGUST 5, 2009</b>

**B. GEF AGENCY(IES) CERTIFICATION**

This request has been prepared in accordance with GEF policies and procedures and meets the GEF criteria for project identification and preparation.

Agency Coordinator, Agency name	Signature	Date (Month, day, year)	Project Contact Person	Telephone	Email Address
Steve Gorman GEF Executive Coordinator The World Bank		July 15, 2009	P. Agostini AFR Regional GEF Coordinator	X37620	pagostini@worldbank.org