



GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS*

THE GEF/LDCF/SCCF TRUST FUNDS

GEF ID:	4477		
Country/Region:	Pakistan		
Project Title:	Comprehensive Reduction and Elimination of Persistent Organic Pollutants in Pakistan		
GEF Agency:	UNDP	GEF Agency Project ID:	4600 (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; Project Mana;		
Anticipated Financing PPG:	\$0	Project Grant:	\$5,150,000
Co-financing:	\$20,060,000	Total Project Cost:	\$25,210,000
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?	UNDP has dealt in the past with similar projects in other regions and would be able to implement this project.	
	4. If there is a non-grant instrument in the project, is the GEF Agency capable of managing it?	No	
	5. Does the project fit into the Agency's program and staff capacity in the country?	Yes	
	6. Is the proposed Grant (including the Agency fee) within the resources		

*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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Resource Availability	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		
	• focal area set-aside?		
Project Consistency	7. Is the project aligned with the focal /multifocal areas/ LDCF/SCCF/NPIF results framework?	The components are all aligned with the chemicals focal area strategy, however the project design needs clarification. See below. 4/11/11 - components have been clarified - comment cleared.	
	8. Are the relevant GEF 5 focal/ multifocal areas/LDCF/SCCF/NPIF objectives identified?	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?	Yes	
	10. Does the proposal clearly articulate how the capacities developed, if any, will contribute to the sustainability of project outcomes?	No. There are a number of training programs being proposed but it is unclear how they will be made sustainable in the context of the development of legislation and ESM for PCB and other POPs. July 28, 2011 - The comment has been addressed. Please note that in the elaboration of the FSP Document a clear	

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		description of how the sustainability will be ensured must be included.	
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?	<p>No, there is no clear baseline project described. For the assessment of contamination caused by the flooding is there already work that is being done or will this be a new activity?</p> <p>Please clarify what work is in progress, completed or planned that will be built upon by this project.</p> <p>July 28, 2011 - The revised PIF and response to the comments of the last review show that there is no baseline project. This project will be done in the absence of any other work. The reason appears to be that the level of awareness is not there for POPS. It will be useful if the Government can work with the industries to identify areas where they can work together. We would like to see more details on how the utilities intend to manage their PCB containing equipment. Are there still equipment in use? Are there plans to remove them for service, retrofit them or manage in place?</p> <p>Additionally will there be any container management put into place for POPS pesticides.</p> <p>4/11/11 - the baseline project has been clearly defined. Comment cleared</p>	

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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?		
	13. Are the activities that will be financed using GEF/LDCF/SCCF funding based on incremental/ additional reasoning?	<p>cannot access incrementality due to an unclear baseline.</p> <p>May 10 - The new description of the Baseline project raises more questions that it answers. There is a disconnect from what is proposed in the project framework and what is described in the first paragraph of the baseline project description.</p> <p>We would recommend that a deeper discussion with the project proponents take place in order to identify what actions are planned and ongoing by the Government and local stakeholders to address POPs.</p> <p>We also recommend that the project design be clarified to what actions will be taken by the projects in a logical sequence.</p> <p>July 28, 2011 - the project still does not clarify what will be paid on an incremental basis.</p> <p>4/11/11 - comments addressed and cleared.</p>	
	14. Is the project framework sound and sufficiently clear?	No. There are a number of issues that are intertwined in the project and there	

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		<p>is a need to have a more logical approach to each major component for the project.</p> <p>There is a component to access the contamination caused by the flooding in Pakistan. For this activity it is not clear if this activity will compliment work being done in the flooded areas to help to address the problems caused by the flooding.</p> <p>The second major activity seems to be the collection and disposal of obsoleted POPS including PCBs. This should be a one off activity unless there are other stockpiles that have not been discovered in the NIP.</p> <p>The third component is the NIP update. We wish to draw the attention to the GEF 5 strategy on NIP Updates which limits the funding to no more than 250,000 USD for activities described in the strategy. Please breakdown the costs in component 3 so that we can access the costs in this section.</p> <p>May 10 - Component 4 is still unclear in regard to the disposal scheme. What is envisaged to be accomplished by this. Additionally the updating of the chemical profile can be done as part of the NIP update. We would suggest including this component in Component 3 and reduce the funding requested.</p>	

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		<p>July 28, 2011 - The project framework is clear and logical. Some work is still required to clarify the issues raised in previous questions above.</p> <p>4/11/11 - Comments addressed - comment cleared</p>	
	15. Are the applied methodology and assumptions for the description of the incremental/additional benefits sound and appropriate?	<p>Please describe how the specific project components will achieve the Global Environmental Benefits.</p> <p>4/11/11 - Comment cleared.</p>	
	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 indigenous people, taken into consideration, their role identified and addressed properly?	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)	<p>No. A major issue being brought up in this proposal is due to a climate event. How would such a repeat of this type of event affect the situation of POPs in Pakistan and how will the project seek to prevent an occurrence of the effects of such an event in the future?</p> <p>May 10 - Explanation provided is satisfactory - Comment Cleared.</p>	
	19. Is the project consistent and properly coordinated with other related initiatives in the country or in the region?	Yes. Please ensure that all disposal activities are properly coordinated to prevent duplication of effort.	

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	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>Yes, within acceptable ranges.</p> <p>July 28, 2011 - Further to the email on project management costs sent by GEF SEC to the agencies, please justify the need for project management costs exceeding 5%.</p> <p>4/11/11 - PM cost adjusted. Comment cleared</p>	
	24. Is the funding and co-financing per objective appropriate and adequate to achieve the expected outcomes and outputs?	<p>Need further information as mentioned above.</p> <p>May 10 - Component 1 should be revised to no more than 200,000 Component 2 should be revised to no more than 100,000. Component 3 is appropriate, however the updating of the National Chemical Profile in component 4 should be included without increasing the budget in component 3.. The cost effectiveness of Component 5 is still higher than other projects.</p> <p>July 28, 2011 - Components revised - comment cleared.</p>	

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	25. At PIF: comment on the indicated cofinancing; At CEO endorsement: indicate if confirmed co-financing is provided.	<p>The co-financing is not confirmed at this stage.</p> <p>May 10 - some of the cofinancing is confirmed, however there is still no indication of the co-financing coming from the utilities.</p> <p>July 28, 2011 - the level of co-financing has been raised, however please refer to the comments in the baseline question.</p> <p>4/11/11 - baseline funding is clear and adequate. Comment Cleared</p>	
	26. Is the co-financing amount that the Agency is bringing to the project in line with its role?	<p>Yes. UNDP proposes to provide 1M in cash co-financing.</p> <p>July 28, 2011 - The amount from UNDP has decreased by 300,000, please clarify.</p> <p>4/11/11 - programming changes in the country office has resulted in a lower amount form UNDP country office resources, however overall co-financing has been increased. Comment Cleared</p>	
Project Monitoring and Evaluation	27. Have the appropriate Tracking Tools been included with information for all relevant indicators, as applicable?		
	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	
	• Convention Secretariat?	None Received	

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	<ul style="list-style-type: none"> • Council comments? • Other GEF Agencies? 	None Received	
Secretariat Recommendation			
Recommendation at PIF Stage	30. Is PIF clearance/approval being recommended?	<p>The PIF cannot be cleared at this stage. Further consideration will be given provided a revised PIF is submitted along with responses to the questions raised above and summarised below:</p> <ol style="list-style-type: none"> 1. The project design is confusing. Would the assessment of the potential contaminated sites as a result of flooding be included in the work on the NIP update? 2. There would be a need to access the level of contamination caused by the flooding, but are there already plans to do this? Would the project team have to start from scratch? Are there suspected hotspots already? 3. The Guidance provided in the GEF 5 Strategy document on updating of NIPs indicated funding up to a maximum of 250,000 USD would be provided to the countries to update their National Implementation Plans to include the nine new chemicals. In this regard please break down the costs indicted in activity 3 of the project framework so we can access the costs of the various activities being proposed in this component. 4. Why is there not a country wide 	

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		<p>PCB management system being developed instead of a number of province level systems? The same applies to a province level POPs management system.</p> <p>5. After disposal of the obsolete POPS, why is there a need for further management? Is it envisioned that there will be more obsolete POPs identified?</p> <p>6. Are their regulations related to the BASEL convention that will prevent hazardous waste to be shipped from Pakistan?</p> <p>7. Please explain what is meant by development of a scheme for POPs as part of a hazardous waste management scheme. Does this waste management system already exist and the handling and disposal of POPs would be incorporated into the system?</p> <p>8. Why is only legislation on POPS being considered? Will the country have the resources to manage a single chemical category law?</p> <p>9. What type of training is being envisioned and how will the project make the training sustainable.</p> <p>10. For the POPS pesticides that are proposed to be dealt with in this project, have alternatives already been adopted and implemented and if not how is the</p>	

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		<p>use of POPS pesticides being dealt with?</p> <p>11. In reviewing the project there are four main components that are intertwined in the project and it may be useful to consider how to arrange the project framework so that it works logically on these issues. The first issue we see is the need for the rapid assessment of contamination caused by the flooding in Pakistan, however we would stress that there already be plans in the making or ongoing to deal with this and the GEF intervention can assist with the analysis etc. The second issue is disposal of stockpiles which should be a one off activity to repack and ship for disposal. The third is the development of an ESM for existing PCB infrastructure and finally the fourth is alternatives to POPS pesticides,</p> <p>12. For the ESM of PCB we are not clear on the involvement of the private sector in this as this would be an area where the utilities would benefit from the GEF intervention and as such we would expect to see co-financing identified from this sector.</p> <p>May 10 - Further clarifications and revisions are required before a decision to recommend this project can be made.</p> <p>July 28, 2011 - Requires further revision</p>	

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		November 4, 2011 - Substantial effort in improving the project framework and financing has been done. The project addresses all the comments raised during the review and can now be recommended for elaboration into a FSP.	
	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 23, 2011	
	Additional review (as necessary)	May 10, 2011	
	Additional review (as necessary)	July 29, 2011	
	Additional review (as necessary)	November 04, 2011	
	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?	
	2. Is itemized budget justified?	
Secretariat Recommendation	3. Is PPG approval being recommended?	
	4. Other comments	

Review Date (s)	First review*	
	Additional review (as necessary)	

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