PROJECT EXECUTIVE SUMMARY

REQUEST FOR Council Work Program Inclusion
UNDER THE GEF Trust Fund

GEFSEC PROJECT ID: 1520
IA/ExA PROJECT ID: GF/IND/07/XXX
COUNTRY: India
PROJECT TITLE: Development of a National Implementation Plan in India as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)
GEF IA/ExA: UNIDO
OTHER PROJECT EXECUTING AGENCY(IES): Ministry of Environment and Forests, India
DURATION: 2 years
GEF FOCAL AREA: Persistent Org. Pollutants
GEF STRATEGIC OBJECTIVES: POP-1: Assist in the development of NIP program and disseminate information on best practices
GEF OPERATIONAL PROGRAM: OP 14
PIPELINE ENTRY DATE: 20 September 2002
EXPECTED STARTING DATE: September 2007
EXPECTED CEO ENDORSEMENT: August 2007
IA/ExA FEE: $ 355,810

FINANCING PLAN ($)		
	PPG	Project*
GEF Total	**$ 317,000**	**$3,241,100**
Co-financing	(provide details in Section b: Co-financing)	
GEF IA/ExA UNIDO (in kind)	$ 40,000	$ 200,000
Government of India (in cash/in kind)	$ 40,000	$6,880,000
Others		
Co-financing Total	**$ 397,000**	**$ 7,080,000**
Total	**$ 397,000**	**$10,321,100**
Financing for Associated Activities If Any:		

** For multi-focal projects, indicate agreed split between focal area allocations

FOR JOINT PARTNERSHIP**		
GEF PROJECT/COMPONENT ($)		
(Agency Name)	(Share)	(Fee)
(Agency Name)	(Share)	(Fee)
(Agency Name)	(Share)	(Fee)

*** Projects that are jointly implemented by more than one IA or ExA

CONTRIBUTION TO KEY INDICATORS IDENTIFIED IN THE FOCAL AREA STRATEGIES:
1. (c) Number of countries submitting their initial NIP to the COP

Approved on behalf of the *United Nations Industrial Development Organization (UNIDO)*. This proposal has been prepared in accordance with GEF policies and procedures and meets the standards of the GEF Project Review Criteria for work program inclusion.

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1. PROJECT SUMMARY

A. PROJECT RATIONALE, OBJECTIVES, OUTCOMES/OUTPUTS AND ACTIVITIES

A.1 PROJECT RATIONALE

1. The Stockholm Convention on Persistent Organic Pollutants (POPs), which was adopted in May 2001 with the objective of protecting human health and the environment from POPs, come into force on 17th May 2004. Parties to the Stockholm Convention are required to develop National Implementation Plans (NIPs) to demonstrate how their obligations to the Convention will be implemented. Each Party is to submit their NIP to the Conference of the Parties (COP) within two years of the date on which the Convention enters into force for the Party. India signed the Convention on 14 May 2002 and ratified it on 13 January 2006.

2. India recognizes its obligation, under Article 7 of the Convention, to develop and submit a NIP to the COP[1]. As such, India is committed to complete and deliver its NIP within the timetable set out in the Convention.

3. The NIP for India is to be developed keeping in mind the specific requirements of the country. The focus is on socio-economic aspects, sustainable development and environmentally appropriate policies and actions. The Stockholm Convention places obligations on the Parties for 12 chemicals; however a provision is also made in this NIP to respond to the listing of any new chemicals.

4. India is committed to starting the compilation of the NIP. As such, the country invited the United Nations Industrial Development Organization (UNIDO) to act as the GEF Executing Agency with expanded opportunities for the development of the NIP and opted to undertake this work in two phases through the full GEF project cycle rather than by taking up the so-called 'Enabling Activities'. The GEF-funded, UNIDO-executed PDF-B project entitled "*Development of a National Implementation Plan in India as a first step to implement the Stockholm Convention on POPs*", whose objective is to identify the requirements for developing the NIP through a preliminary assessment, was implemented during 2004 by the Ministry of Environment and Forests (MOEF) through the Industrial Toxicology Research Centre (ITRC), Lucknow. This Project Brief is the principal outcome of that preparatory phase.

5. During the PDF-B phase, GEF through UNIDO provided funding for a series of capacity building workshops to raise the awareness of national and state officials and industry to the requirements of the Stockholm Convention. These workshops were of particular assistance in the preparation of the project brief. A coordinating mechanism drawing together India's international development partners was established to ensure that NIP development takes full advantage of the findings and experience of associated projects and programmes executed by intergovernmental organizations and bilateral donors. Studies on exposure and health impacts of POPs on living systems and of integrated approaches for the replacement of POPs, as well as further capacity building to improve the management of PCBs wastes and the assessment of sources, releases and pathways of unintentional by-products will be undertaken during the full project.

6. The National Experts Committee (NEC) for the project identified five representative zones covering 16 states in the country for core assessment and nation wide projections on POPs and POP-related activities. With a view to developing questionnaire-based methodology to undertake inventories of sources, releases, contaminated sites, hotspots, etc. of POPs, workshops were organized in each zone to discuss technical aspects with relevant stakeholders (private sector

[1] Articles 7 (1)(a)-(b) of the Convention

representatives of small, medium and large enterprises, industrial and agricultural associations, academic institutions, testing laboratories, public institutions and Government bodies).

7. A series of five interactive workshops, one in each zone, were organized for representatives of national as well as the States and Union Territories' infrastructure of Government institutions, commerce and industry, public and private testing laboratories, research institutes, enforcement entities, public health institutes, non-governmental organizations (NGOs) and other associations that are relevant to the implementation of the Stockholm Convention, to facilitate assessment of regulatory control, enforcement capacity, research and development, health and environmental risks and also assess capacity building needs.

A.2 PROJECT OBJECTIVE

8. The overall objective of the full project is to develop the NIP for India to meet its obligation with the Convention. To stand by this commitment, the Project will:

- Establish inventories on the production, use, trade, stockpiles and wastes of, and sites contaminated by, the chemicals listed in the Annexes of the Convention and existing in India.
- Develop strategies and action plans for the reduction and elimination of the chemicals listed in Annexes of the Convention, which exist in India.
- Assess infrastructure capacity and propose management options, including institutional arrangements, regulatory frameworks, and requirements for capacity building, raising stakeholder awareness and research and development, to ensure the effective and sustainable implementation of the proposed strategies and action plans and thus facilitate India's preparedness for compliance with the Convention.
- Formulate and gain stakeholder endorsement for a NIP, including priorities and objectives with the aim of estimating the total costs and the additional costs likely to be incurred for introduction into development and assistance planning.
- Build sustainable capacity sufficient to prepare the NIP and its component inventories, strategies and action plans, and to fulfill ongoing reporting requirements of the Convention.
- Develop and demonstrate methodologies representing practical and feasible approaches to priority actions required by India in meetings its Convention obligations.

9. Capacity building at the national, state and district levels is needed in India. A long-term Capacity Building Programme addressing POPs issues therefore needs to be developed for donor funding.

A.2.1 LONG-TERM OBJECTIVE

10. The long-term objective of this project is to protect human health and the environment from persistent organic pollutants – the principal objective of the Convention. The purpose of the project is to enable India to take the first steps towards implementation of the Convention. Its principal outputs are:

a) A comprehensive National Implementation Plan (NIP) incorporating an assessment of the national baseline with regard to POPs chemicals including preliminary inventories of POPs chemicals currently in production and use, of PCBs and equipment containing PCBs, of unintentional production of POPs, of human exposure of POPs and health impacts, of research and development capabilities, and of regulatory and institutional frameworks relating to POPs and chemicals management and control.

b) Management strategies, action plans and investment needs required by India to meet its obligations under the Convention.

c) A methodology for the identification of sites contaminated by POPs or products containing POPs.

d) A Capacity Building Programme proposal to meet India's long term institutional strengthening and capacity building needs.

e) Management and information systems functioning at national level and instigated at state level.

f) A national information centre established and information dissemination and public awareness and education campaigns developed.

g) A pilot study to investigate the exposure to POPs and their adverse effects with special emphasis on the health of women and children and other high risk groups with the vastness of India's genetic diversity, environmental genomic based molecular epidemiology for POP affects needed.

h) Research study on non-POP alternatives for vector control.

i) A pilot project to develop a detailed inventory methodology for PCBs.

j) A pilot capacity building programme on PCBs management.

k) A demonstration of methodologies to promote the implementation of best available techniques (BAT) and best environmental practices (BEP) to reduce unintentional production of POPs in key sectors of industry.

A.2.2 SPECIFIC PROJECT OBJECTIVES AND ACTIVITIES

11. To achieve the requisite outputs, the activities of the project have been grouped into a series of work packages each focused on a specific objective as follows:

1. Convention implementation infrastructure at national and state levels
2. Measures in relation to DDT, the only POP pesticide currently being produced and used in India
3. Measures in relation to polychlorinated biphenyls (PCBs)
4. Measures in relation to unintentionally produced POPs
5. Measures in relation to wastes and contaminated sites
6. Project Management and Monitoring & Evaluation

Outcome for Objective 1: Convention implementation infrastructure at national and state levels

Output 1.1 Develop and implement national management system for the Stockholm Convention compliance

Activity 1.1.1 Establish national management system

- The National Steering Committee (NSC) has been formed to harmonize the interests and standpoints of different ministries, state administrations and commissions as well as to determine the position of the Government of India with regard to POPs issues.
- The MOEF is the designated agency responsible for implementing the Stockholm Convention in India.

- Determine and formalize appropriate linkages between the NSC, national and state departments and bureaus providing monitoring information, regulatory control and other services.
- Conduct training to build capacity in national and state departments and bureaus providing monitoring information, regulatory control and other services.

Activity 1.1.2 Establish Information Management System (IMS)

- Examine existing IT architecture within lead organization.
- Determine inventory and reporting requirements of the Convention.
- Assess results and actions of other work packages (described below) relevant to information needs.
- Determine remaining information needs.
- Determine existing data holdings relevant to POPs within other government departments and non-government institutions.
- Encourage cooperation between institutions gathering information that may be relevant to the reporting requirements of the Convention so that this can be exchanged with the IMS.
- Recruit and train staff to operate IMS.
- Establish data management infrastructure capable of input, storage modeling and reporting of national and state information in formats compatible with Convention requirements.

Output 1.2: Preparation of the National Implementation Plan (NIP)

Activity 1.2.1 Draft the National Implementation Plan

- Prepare the National Profile.
- Integrate the profile, inventory reports, strategies and action plans from all objectives into a comprehensive draft NIP suitable for transmission to the COP according to the requirements of Article 7 and formats in consistent with the recommendations arising from the COP.
- Consolidate national priorities and their concomitant l costs.

Activity 1.2.2 Review and endorse the National Implementation Plan

- Conduct a detailed review of the draft NIP and its component implementation plans with international and national experts and representatives of principal stakeholder groups.
- Correct, amend and modify the draft NIP to take into account the review recommendations.
- Hold meetings with principal stakeholders at national and state levels to introduce and gain endorsement for the NIP, its component implementation plans and priority actions.
- Disseminate the draft NIP to relevant ministries to gain its endorsement.
- Correct, amend and modify the draft NIP to take into consideration the recommendations from these ministries.
- Submit the NIP for Government endorsement.

- Prepare the final NIP for publication in English with an executive summary translated into Hindi.
- Submit the final NIP to the appropriate authorities for transmission, through the Convention Secretariat then to the COP.

Output 1.3: Develop national and state policy, legal, regulatory and promotional frameworks to meet the Convention requirements

Activity 1.3.1 Establish regulatory requirements in relation to national sustainable development policies, national environmental protection plans, country assistance strategies, state laws and administrative regulations

- Integrate results and recommendations with regard to national sustainable development policies, national environmental protection plans and country assistance strategies.
- Integrate results and recommendations with regard to state laws and administrative regulations.
- Examine the recommendations for consistency, conformity with Convention requirements and Government policies, plans and laws.
- Examine the recommendations for conformity with other multilateral environmental agreements.

Activity 1.3.2 Establish regulatory requirements in relation to national and state administrative rules, standards and guidelines

- Integrate results and recommendations from Objectives 2 - 5 with regard to national and state administrative rules, standards and guidelines.
- Examine the recommendations for consistency and conformity with the Convention requirements.

Activity 1.3.3 Assess opportunities for voluntary promotions schemes to address the Convention requirements

- Assess opportunities to encourage industry compliance with the Convention objectives and obligations through market-led voluntary approaches, such as Cleaner Production, ISO accreditation or eco-labeling initiatives.
- Assess opportunities to encourage voluntary compliance with the Convention objectives and obligations amongst users of POPs chemicals through taking up, for example, integrated pest management and improved health awareness.

Activity 1.3.4 Undertake Socio-economic impact study

- Using parameters such as those included in Annex F of the Convention, study the social and economic impact of: (a) the continuing use of POPs chemicals; and (b) the possible regulatory requirements and voluntary schemes, to assess the costs and benefits of proposed actions to facilitate the consideration of proposals by legislative bodies.

Activity 1.3.5 Provide recommendations and gain endorsement for them

- Provide recommendations and cost-benefit analysis to relevant legislative bodies.
- Hold detailed consultations with legislative bodies and principal stakeholders to review and gain endorsement for inclusion of the recommendations in the NIP.

- Present the recommendations to MOEF who will in turn present the same to legislative bodies to facilitate legal drafting.
- Assess institutional strengthening and capacity building implications of recommended actions at national and state level for integration with the Capacity Building Programme proposal.

Output 1.4: Information exchange, public awareness and education

Activity1.4.1 Establish the National Information Centre

- Review national and state level requirements for the provision of information to stakeholders including the public.
- Establish within MOEF, a national information centre and determine the appropriate arrangements to establish an information network providing public access to POPs information in consistent with Article 10 of the Convention at provincial level.
- Establish an Internet presence for the purpose of disseminating information related to the objectives of the Stockholm Convention and other multinational chemicals management agreements.

Activity 1.4.2 Increase public awareness of POPs issues related to agriculture

- Determine, in conjunction with the Ministry of Agriculture, FAO and other stakeholders, appropriate educational schemes to raise awareness of the hazards posed by the use and inappropriate management of intentionally produced POPs;
- Devise appropriate programmes and materials that can be delivered, for example through the agricultural extension workers network, to promote environmentally sound alternatives to POPs or integrated pest management alternatives.
- Develop appropriate programmes and materials for enterprises licensed to produce POPs chemicals, to use POPs chemicals in product formulations, and to distribute these chemicals and products to promote an improved and safer manufacturing and handling as well as progressive transfer to effective and environmentally sound alternatives.

Activity 1.4.3 Increase industry and public awareness of unintentional production of POPs

- Determine, in conjunction with the MOEF, other relevant Ministries and their development partners and stakeholders, appropriate educational schemes to raise awareness of industry and the public on the hazards posed by the unintentional production and releases of POPs.
- Examine the examples of best environmental practices in other countries for methodologies that are useful in India.
- Devise appropriate awareness raising programmes and materials that can be delivered in conjunction with schemes to promote the improved performance of industry.

Activity 1.4.4 Increase national and local government, municipalities, industry and public awareness of POPs issues related to waste management

- Determine, in conjunction with the national and local government, municipalities, relevant ministries and their development partners and other stakeholders, appropriate educational schemes to raise awareness of administrations, industry and the public of the hazards posed by the inappropriate disposal of wastes comprising POPs or products

containing POPs.

- Devise appropriate awareness raising programmes and materials that can be delivered in conjunction with schemes to promote environmentally sound waste management in conjunction with Activity 1.5.

Output 1.5: Develop R&D and monitoring strategies

Activity 1.5.1 Undertake an exposure risk assessment study of POPs

- Collect available information on the adverse health effects of POPs from national and international studies.
- Study exposure and affect to high-risk groups such as women and children needs specific study.
- Hold expert workshop to review the information collected and select the study sites, design investigation methodologies and establish the sampling cohort.
- Conduct methodology training for field teams.
- Collect information through health and clinical examinations of population cohort, field investigations of levels of pesticides and PCB in the environment – water, soil and food in the pilot area, and monitoring and analysis of samples.
- Prepare a preliminary assessment of health impacts posed by POPs to guide future actions.
- Undertake studies on environmental fate and exposure pathways of unintentional POP chemical under the Indian conditions including photochemical degradation.

Activity 1.5.2 Develop R&D and monitoring strategies to support the Convention implementation

- Examine national research and development facilities capable of undertaking specific research programmes as well as systematic and regular investigations of POPs production, use, trade, release, disposal, environmental occurrence and impact and provide recommendations for institutional strengthening and capacity building to meet India's obligations under the Convention for monitoring and reporting information.
- Assess, incorporating results from work packages described below, and provide recommendations for strengthening national R&D programmes (a) leading to improved methodologies for preparing regular POPs inventories (b) leading to improved techniques for production, management and disposal of POPs and products containing POPs and alternative environmentally sound products and practices, removing barriers to POPs elimination, (c) providing testing information on new industrial chemicals and pesticides to ensure compliance with Article 3 para 3 and Annexes D, E and F of the Convention, (d) leading to the determination of release limit values, to improved disposal techniques, and to improve methodologies for the identification and characterization of land contaminated by POPs to ensure compliance, in particular, with Articles 5, 6 and 11.

Outcome for Objective 2: Measures in relation to DDT, the only POP pesticide currently being produced and used in India

Output 2.1 Develop measures to restrict and/or eliminate production, use and trade of DDT

Activity 2.1.1 Establish inventories on production, distribution, use, and international trade

- Develop production inventory methodologies.
- Undertake preliminary inventory of production of currently produced DDT through questionnaires, field visits and in-depth studies.
- Undertake inventory of distribution and use of DDT through customer investigations.
- Prepare inventory of international trade on currently produced DDT.
- Identify potential obsolete pesticides during above-mentioned activities and prepare an inventory.
- Prepare current and forecast future production, distribution, use of DDT in India and trade to and from the country.
- Detailed retrieval and collection of data on DDT levels in different compartments over the years to find the trend change and develop mathematical modeling for future scenario.

Activity 2.1.2 Develop reduction and phase-out strategies

- Investigate alternative techniques for the control and phase-out of intentionally produced POPs, in particular, alternative technologies.
- Evaluate the feasibility of alternative technologies for use in India.
- Evaluate existing institutional and regulatory barriers to the reduction of intentionally produced and used POPs chemicals and develop viable alternative i.e. both cost effective and capable of controlling diseases.
- Assess public awareness and participation opportunities and prepare recommendations to increase awareness and participation.
- Assess monitoring and R&D capacity.
- Formulate the strategy on reduction and phase-out of these POPs for inclusion in the NIP.

Activity 2.1.3 Build capacity within the national focal point

- Train government officials involved in the implementation of the country's obligations under the Convention relating to the POPs chemicals intentionally produced and used.
- Establish an Information Management System (IMS) for the intentionally produced POPs within MOEF.
- Establish a long-term expert working group to support MOEF in the implementation of the Convention obligations relating to the intentionally produced POPs chemicals.

Output 2.2 Develop measures in relation to stockpiles of/or containing, intentionally produced POPs

Activity 2.2.1 Establish national inventory of stockpiles

- Develop a stockpile inventory methodology, taking advantage, wherever possible, of information from inventories established in Activity 2.1
- Undertake preliminary inventory of stockpiles through questionnaires and in-depth studies on contaminated sites/hotspots in the vicinity of historical and existing production sites.
- Prepare data according to established formats for inclusion in the data management system and for reporting in the NIP.

Activity 2.2.2 Develop guidelines for the management of stockpiles

- Examine existing regulatory measures related to the management of stockpiles.
- Identify additional measures necessary for the safe, efficient and environmentally sound management of stockpiles and proper disposal of expired stocks at contaminated sites/hotspots.
- Identify and make proposals to overcome barriers to effective working of current and proposed management measures.
- Hold stakeholder workshop to review and endorse recommendations.
- Prepare recommendations for inclusions in the NIP and regulatory framework.

Outcome for Objective 3: Measures in relation to polychlorinated biphenyls (PCBs)

Output 3.1: Prepare a preliminary national inventory of PCBs and PCB-containing equipment

Activity 3.1.1 Collect national information on production, import and use of PCBs and PCB-containing equipment

- Build on initial inventory prepared in the PDF-B phase by gathering further information relating to import of PCBs and PCB-containing equipment.
- Prepare national inventory of equipment still in use from records held by utility corporations, government and other sources.
- Conduct preliminary surveys at state level to develop a preliminary inventory.
- Present the preliminary inventory to principal stakeholders.
- Prepare the preliminary inventory according to format suitable for inclusion in the NIP.

Activity 3.1.2 Collect information on management and monitoring capacity

- Gather information related to the existing control, management and replacement planning of equipment in use.
- Assess capacity to undertake any phase-out programme that is necessary to meet the Convention requirements.
- Make recommendations for capacity building and planning requirements.
- Present recommendations to principal stakeholders.

Output 3.2 Develop and demonstrate a detailed inventory methodology for PCBs and a draft strategy on PCB disposal in India

Activity 3.2.1 Develop and test a detailed inventory methodology for PCBs

- Prepare requirements, guidelines and training for inventory.
- Investigate PCB-containing devices in use.
- Investigate obsolete PCB-containing devices and their current storage conditions.
- Review inventory information and develop timetable for equipment replacement and for safe storage.
- Prepare a management information system to hold the inventory data and replacement timetables.

- Prepare recommendations for PCB storage compatible with the Convention requirements.

Activity 3.2.2 Develop draft national strategy on options and approaches to PCB reduction and disposal

- Assess the existing national institutional framework of PCB policy and management.
- Assess the current PCB disposal management and monitoring and prepare draft strategy including storage and disposal of obsolete, out-of-use PCB-containing devices.
- Review the draft national strategy.
- Disseminate information to relevant stakeholders within the central and state governments, electrical utilities and industry.

Output 3.3 Building capacity in PCBs management

Activity 3.3.1 Establish pilot training programme

- Facilitate national expert group meeting to reach consensus on key technical and logistical issues and to promote awareness of PCB issues in India;
- Undertake a pilot programme in each state by conducting workshops to raise awareness on health and safety issues, inventory, management and destruction methods and techniques for key stakeholders.
- Lead a study tour on PCBs management, storage and destruction facilities to a country that has a well-developed PCBs management programme.

Activity 3.3.2 Develop a national PCBs training programme

- Develop a proposal for a permanent, sustainable training programme to address all aspects of PCBs identification, inventories, analysis and disposal work.

Outcome for Objective 4: Measures in relation to unintentionally produced POPs

Output 4.1 Develop measures for the progressive reduction of releases and elimination of sources of unintentionally produced POPs

Activity 4.1.1 Develop inventories of sources and estimates of releases

- Train project management staff, entrepreneurs and government officials to disseminate knowledge on how POPs may be formed unintentionally under local conditions.
- Undertake surveys and establish questionnaires to collect data and information on sources of unintentionally produced POPs in India.
- Develop the source inventories and estimate the unintentional production of POPs, providing detailed technical commentary on the modeled results.

Activity 4.1.2 Evaluate existing analytical and monitoring capacity and needs

- Evaluate the analytical and monitoring capacity of existing laboratories, their human and physical resources, management and analytical standards.
- Develop a plan to strengthen national analytical institutions to establish national analytical capabilities for monitoring unintentionally produced POPs.

- Evaluate the need for establishing national standards for the sampling and analysis of unintentionally produced POPs.
- Evaluate available methods that use indirect data for the estimation and modeling of unintentional production of POPs and, where necessary, establish revised methodologies and models that are better suited to industrial practices of the key sources of unintentionally produced POPs in India.
- Observations on exposure and effect levels in humans through epidemiological surveys and biological monitoring in likely hot spots.

Activity 4.1.3 Evaluate and develop relevant policies, laws and promotional schemes

- Evaluate the current state of unintentionally produced POPs management in India, including relevant laws, rules and regulations and institutional responsibilities and identify the need to amend these or to develop relevant health and environmental standards and guidelines for unintentionally produced POPs in products, emissions, effluents, wastes, daily intake limits, etc.
- Propose sustainable monitoring and reporting regimes for major sources of unintentionally produced POPs.
- Develop legal and regulatory frameworks to implement BAT requirements for new sources (identified in Part II of Annex C) of unintentional production of POPs.
- Develop regulatory, administrative or other schemes to promote the use of BEP in new sources and BAT and BEP in existing sources of unintentional production.

Activity 4.1.4 Formulate strategies and action plan for the control of unintentionally produced POPs

- Assess the social and economic impacts of releases of unintentionally produced POPs.
- Develop the strategies for unintentionally produced POPs reduction and elimination in India.
- Prepare an action plan as part of the overall NIP within 2 years of entry into force of the Convention.
- Prepare an investment portfolio, including estimates of required costs incurred, to implement the strategies in the action plan relating to key priority industry sectors.
- Hold meetings to raise stakeholder awareness and to gain their support in the preparation of the NIP.

Outcome for Objective 5: Measures in relation to wastes and contaminated sites

Output 5.1 Develop and implement strategies for identifying and managing waste consisting of, containing or contaminated by POPs

Activity 5.1.1 Develop and implement strategies to locate and characterize wastes

- Develop methodology to locate and characterize wastes or sites that potentially host wastes, taking advantage, wherever possible, of information from inventories established in other activities of Output 1.
- Conduct training in inventory techniques for officials, investigators and key stakeholders likely to hold wastes.
- Undertake preliminary inventory of wastes and contaminated sites through

questionnaires, field visits and in-depth studies.

- Establish, within the overall POPs information management system, data management routines to identify, hold, display and report direct and other inventory data.
- Test these data elements through pilot investigations in selected areas.
- Monitoring of POPs can be made mandatory for all surveys on air and water quality in and around waste sites and other potential hotspots.
- Include inventory results in the NIP.

Activity 5.1.2 Develop methodologies for the sound management of products and articles in use, and wastes

- Collect draft recommendations arising from all other activities of Outputs 1 and 2 (workshops) as well as those related to the sound management of products and articles in use and wastes.
- Test their appropriateness against the obligations for wastes set out in Article 6 of the Convention and, where necessary, make additional recommendations to ensure compliance.
- Examine the techniques that may be in use in India or elsewhere for the environmentally sound handling, collection, transport and storage of POPs wastes.
- Assess the appropriateness of these techniques to wide application in the Indian context and prepare recommendations establishing the preferred methodology, or methodologies meeting Convention requirements.
- Examine the incremental costs to those with actual or potential liabilities arising from the additional requirements of sound management of POPs products and wastes and prepare a national strategy for implementation.
- Identify the most effective destruction methods in conformity with the requirements of the Stockholm Convention dealing with the typical obsolete POPs pesticides/PCBs disposal and in this context introduce technical specifications for cement kilns and non-combustion technologies.
- Hold a national expert review meeting to examine and endorse recommendations and a national implementation strategy based on agreed priorities.

Activity 5.1.3 Develop strategies for the appropriate disposal of POPs

- Review recommendations from other activities of Outputs 1 and 2 relating to the disposal of POPs materials and wastes and test their compliance with Article 6 of the Convention.
- Examine, where appropriate, the techniques used in India and elsewhere to destroy, irreversibly transform or otherwise dispose of POPs.
- Assess the appropriateness of these techniques for application in India and prepare recommendations establishing preferred techniques to meet the requirements of the Convention, including for BAT/BEP.
- Examine any additional costs involved in the introduction of appropriate disposal techniques or the modification of existing techniques to comply with the Convention.
- Prepare recommendations and a draft national strategy for implementation.
- Hold a national expert review meeting to examine and endorse the recommendations and

strategy.

- Conduct R&D for cost effective technology for safe disposal of POPs stockpiles/POPs containing wastes.

Activity 5.1.4 Evaluate regulatory framework and institutional responsibilities pertaining to the management of waste

- Review the draft recommendations arising from other activities of Output 2 for modification of the regulatory framework governing the management of POPs products in use, and of wastes, their international trade and disposal to ensure compatibility with Article 6 of the Convention and, where applicable, with other multilateral environmental agreements to which India is a party.
- Make, where necessary, additional recommendations to ensure compliance.
- Examine institutional responsibilities relating to measures to ensure that POPs wastes are handled, transported and stored in an environmentally sound manner and that actions are reported as required by the Convention and, where appropriate, prepare recommendations for revised responsibilities.

Activity 5.1.5 Prepare and disseminate training and awareness raising materials and technical guidance for the management of POPs wastes

- Prepare in conjunction with Activity 1.4 training and awareness-raising materials and technical guidelines to promote environmentally sound management and assist stakeholders to dispose of POPs materials in a manner compatible with the Convention.
- Hold training and information meetings to disseminate information and guidance to national and provincial officials and key stakeholders that possesses POPs wastes requiring, or likely to require disposal or who operate disposal facilities.

Output 5.2 Develop measures to identify sites contaminated by POPs

Activity 5.2.1 Develop strategy for the identification of contaminated sites

- Develop a methodology for the preparation of an inventory of potential contaminated sites and hotspots using, where possible, existing information related to primary or secondary production, storage, transport, use and disposal of POPs or products containing POPs.
- Use this methodology and incorporate the results of inventory work undertaken in Objectives 1 and 2 to provide a preliminary national inventory.
- Conduct preliminary investigations to refine this inventory in selected states through field characterization and interviews with relevant persons.
- Establish risk assessment criteria related to contaminated sites and hotspots and make a preliminary assessment to identify sites requiring priority attention.

Activity 5.2.2 Evaluate relevant laws, policies and institutions

- Assess laws, policies and administrative instruments related to the prevention and control of contamination, to the management of contaminated, or potentially contaminated, sites and to the environmentally sound clean-up of such sites in India and make proposals for

their amendment to meet the country's obligations under the Convention;

- Make recommendations for relevant legal and regulatory measures to control contamination of sites by POPs including the legal principles guiding the assignment of responsibilities and obligations.
- Assess the capacities of relevant administrative institutions and propose options for institutional strengthening and capacity building.

Outcome for Objective 6: Project management and monitoring & evaluation

Output 6.1 Establish project management and implementation arrangements

Activity 6.1.1 Operate national coordination mechanisms and effective national implementation

- Strengthen the National Steering Committee.
- Appoint the National Project Director.
- Operate the Project Management Committee.
- Implement the project activities according to a letter of agreement and implementation plans established with UNIDO.
- Recruit and supervise national experts and subcontractors as necessary to deliver the project outputs.
- Prepare and present project plans, regular progress and financial reports to UNIDO and to meetings of the NSC.
- Establish arrangements for independent financial audit at key stages.

Activity 6.1.2 ***Establish*** *a Technical Coordination Group at MOEF including the engagement of 5 institutions specialized in the field of pesticides, PCBs, dioxins and furans, analytical and legal and strengthen the existing UNIDO RCO in Delhi*

- Establish a Technical Coordination Group at MOEF and strengthen the existing UNIDO RCO in Delhi to provide administrative, financial and logistical functions in support of the project.
- Provide technical advice, international experts and other services as necessary to assist MOEF in accordance with letter of agreement and implementation plans.
- Participate in NSC meetings.
- Provide support to Technical Coordination Group.
- Provide necessary management, technical and financial reporting to the Implementing Agency and the GEF and cooperate with any audit requirements.

Output 6.2 Operate project review, monitoring and evaluation mechanism

Activity 6.2.1 Establish independent technical peer review mechanism

- Establish an independent national expert group for peer review of project outputs.
- Recruit independent international experts to undertake technical reviews at key milestones.

Activity 6.2.2 Establish project evaluation mechanisms

- Undertake annual Project Implementation Reviews (PIRs).
- Agree on a mechanism to provide independent management and financial reviews according to GEF M&E procedures at the termination of the project.
- Undertake an independent terminal project evaluation according to GEF M&E procedures.

B. KEY INDICATORS, ASSUMPTIONS AND RISKS (FROM LOGFRAME)

12. The principal indicator for the success of the project is the delivery of a completed NIP to the COP within the two-year period after entry into force of the Convention.

The key indicators include the following:

- Inventory of DDT;
- Inventory of PCBs;
- Preliminary inventory of unintentionally produced PCDD/PCDF, HCB and PCBs;
- Strategy for identifying stockpiles containing chemicals listed in Annex A and B;
- Strategy for appropriately manage wastes containing chemicals listed in Annex A and B;
- Strategy for identifying contaminated sites containing chemicals listed in Annex A, B and C; and
- Adequate budgetary allocations at central and local levels to implement the Stockholm Convention related obligations.

The Project Logical Framework elaborates the indicators for each activity.

13. The success of India's efforts to complete its NIP within the time period set by the Convention rests on the implementation of this full project without delay and the availability of financial resources. The government of India will contribute a considerable proportion of co-financing but additional resources are required from the GEF, as the principal entity for the financial mechanism of the Convention, to meet the required costs.

14. The project will depend in large measure on the development of successful coordination mechanisms between the national implementing agency and its partner stakeholders within the Government, academia, industry and the public. The willingness of stakeholders to provide and share data, information and knowledge will be critical to the preparation of inventories and other status reports required in the NIP and to the consensual development and implementation of the national strategies and action plans, and the identification of national priorities.

15. The success of the project will also depend on the early availability of guidance from the COP, its review committees and expert groups. It will also depend on the timely delivery of outputs from component work packages so that an integrated NIP can be prepared.

16. Project design is based on the following key assumptions:

a. the NIP is endorsed by the Indian Government;
b. Central and local governments support and participate in project activities;
c. National and local governments provide necessary co-funding and post-project support; and
d. Strengthened national regulatory and policy framework supported by the project continues to work effectively after completion of the project.

17. The Project Logical Framework elaborates the assumptions for each activity.

18. The following risks have been identified during project design:

- Lack of adequate inter-sectoral coordination and cooperation;
- Lack of technical competencies and economic resources for local government to adequately support and participate in project activities; and
- Conflicting stakeholder interests will inhibit realization of project goals.

RISKS

The details of potential risks and the relevant mitigation measures are described in the table below.

Potential Risks	Proposed Mitigation Measures	Rating
1. Delays in development and implementation of the project activities.	The National Steering Committee for the implementation of the proposed project has been set up comprising of Stakeholder Ministries, Department, NGOs, and this would ensure active involvement of all in the implementation process. During the preliminary assessment studies necessary linkages have been established with the stakeholders and their active partnership in the implementation. Therefore, the possible delays in the implementation of the project activities would be avoided.	Low
2. Insufficient project management capacities might lead to delays or restrict the achievement of project benefits	The Project Management System designed for the implementation of this project has been developed after due consultation with all the stakeholders. Since majority of the stakeholders are from the concerned Ministries, Department and Governmental institutions with good work culture, there would efficient management of the project and would avoid delays or restrict the overall outputs of the project. Furthermore, UNIDO would be providing the overall supervision for ensuring effective and timely delivery of the targeted outputs.	Low
3. Risk of inadequate and ineffective stakeholder participation	In the course of the preliminary assessment project stakeholders were selected, concrete contacts established and were all involved in the development of the various activities defined under the present programme. Therefore, there participation would be effective.	Low
4. Availability of cost effective alternatives to POPs pesticide, PCBs, and waste disposal technologies	The Government of India has been actively pursuing the policy of environmental protection through enforcement of appropriate legislation measures and providing incentives to the manufacturers to switch over to cost effective pesticides namely, Neem based pesticide, Bt based biopesticides to eliminate the eight POP pesticides. The use of PCB in the transformer oil has been banned which would continue.	Low
5. Ensuring effective cooperation between concerned agencies at all levels of government.	While the Steering Committee would ensure effective coordination between the centrally sponsored agencies, Departments and Ministries, the Project management committee would ensure effective participation of concerned stakeholders at the State, district and Community Development Block levels,	Low
6. Difficulties in securing access to public and private sector information sources	During the preliminary assessment stage, a beginning has already been made towards strengthening the institutions both in the public and private sector required for data collection, processing and reporting. This would ensure securing access to private and public sector information sources.	Modest
Overall risk rating		**Low**

The Project Logical Framework elaborates the risks for each activity.

2. COUNTRY OWNERSHIP

a. COUNTRY ELIGIBILITY

19. India has expressed its strong commitment to the Stockholm Convention through its active participation in the Conference of Plenipotentiaries held on 22nd-23rd May 2001 in Stockholm and signed its Final Act. India signed the Convention on Persistent Organic Pollutants (POPs) on 14 May 2002 and ratified it on 13 January 2006.

20. India is eligible under paragraph 9(b) of the GEF Instrument. India has signed and ratified the Stockholm Convention on POPs.

b. COUNTRY DRIVENNESS

21. India after the ratification of the Stockholm Convention on 13 January 2006 has accelerated the preparatory activities for the National Implementation Plan (NIP). Due to the time constraints to meet the submission date of NIP and integrate NIP in its national sustainable development strategies, India has started to pursue developing and endeavoring the post-NIP program for the implementation of its obligations under the Convention.

3. PROGRAM AND POLICY CONFORMITY

a. FIT TO GEF FOCAL AREA STRATEGIC OBJECTIVES AND OPERATIONAL PROGRAM

22. The proposed project is consistent with the GEF Operational Programme on Persistent Organic Pollutants (OP #14) and with the indicator of strategic objective 1 (c): Number of countries submitting their initial NIP to the COP and is consistent with the GEF4 Strategic Objective 1, which assist in the development of NIP program and disseminate on information on best practices.

b. SUSTAINABILITY (INCLUDING FINANCIAL SUSTAINABILITY)

23. Sustainability implies not only the commitment of India and its national implementing agency to continue to make provision for Convention implementation, but also on the development of a NIP that provides initiatives to mainstream the objectives of the Stockholm Convention into the nation's broader development policies and strategies and on the management of a wide range of stakeholders.

24. Various objectives of the full project are directed to address these issues. The initiative to develop approaches to BAT for key sectors of the industry relies on the active and willing participation of enterprises. The methodology set out for this activity is broadly similar to that employed globally by UNIDO through its Cleaner Production Programme. This emphasizes both the environmental and economic benefits of participation. Raising production effectiveness and reducing manufacturing inputs, for example, generate lower production costs and provide a positive incentive for enterprises to participate. Concomitant reductions in pollutant releases bring the environmental benefits sought by the general community.

25. The national executing agency, MOEF, has over 20 years experience in the development, implementation and managerial oversight of projects and programmes funded by various Multilateral Environmental Agreements (MEAs) and their funding mechanisms, including the GEF. It has wide experience of collaboration with various intergovernmental organizations, bilateral donors and enterprises in India. It has acted successfully as the national executing

agency for the PDF-B phase of the project and is currently establishing convention implementation measures that are intended to be permanent.

26. Nevertheless, it is recognized that capacity building and institutional strengthening to ensure that India moves successfully from development to the subsequent implementation of its plans cannot be fully achieved within the duration or financial resources of the project proposed here. For this reason, the full project will develop and invite donor support for, a proposal for a longer-term Capacity Building Programme.

c. REPLICABILITY

27. The experience India gains in developing its NIP through these "enabling activities" will be of benefit in the longer term, as the Convention requires regular reporting of progress towards the Convention obligations.

28. India's experience will also be of use and relevance to other developing countries, particularly the more industrialized nations of South and Southeast Asia.

29. Experience within the demonstration and case study components of the project will be of direct benefit to other countries seeking effective strategies to eliminate the use of POPs chemicals.

d. STAKEHOLDER INVOLVEMENT

30. Activities to be undertaken during the full project have been planned in accordance with the initial guidelines for POPs enabling activities established by the GEF. Many of these activities require the willing participation of a broad range of stakeholders. Inventories, for example, require enterprises, local authorities and others to cooperate in the provision and sharing of information. Each of the activities such as provision for stakeholder reviews and endorsement at various stages of development of the NIP and its various action plan and strategies will require the development of successful methodologies *inter alia* encouraging active participation by relevant stakeholder groups. Furthermore, activities set out for the proposed project have been designed so that draft findings are taken to principal stakeholder groups for review and endorsement before being included in the NIP.

31. The main stakeholders are Government departments such as the Ministries of Environment and Forests, Agriculture, Health and Family Welfare, External Affairs, Chemicals and Fertilizers, Urban Development, Department of Roads and Buildings, Railways, Water Resources, Labour, Central Pollution Control Board, Department of Scientific and Industrial Research, Chemical Group of CSIR Laboratories, Industrial Toxicology Research Centre, other relevant research centers/institutes as well as industrial associations, NGOs, public and private enterprises and others. The development of the stakeholder directory will continue in order to facilitate engagement with appropriate actors at key stages.

32. Awareness of the Convention amongst stakeholders at national and state levels has been raised through a series of workshops organized during the PDF-B phase. Representatives from national, state and districts of all government departments viz. health, agriculture, electricity, power, municipal corporations, chemical and fertilizers as well as representatives from industry, non-governmental organizations, research and educational institutions attended the workshops held in Delhi, Vadodara, Pune, Bangalore, Hyderabad, Chandigarh, Bhopal, Kolkatta, Trivandrum and Goa.

33. During the full project, each component work package will include opportunities to engage stakeholders in the development of strategic actions, ranking of objectives against national and Convention priorities, and endorsement of action plans and other outcomes. In many cases, the

proposed actions require stakeholder engagement drawn from both the producers and users of POPs chemicals.

34. The obligations of the Convention require more than the establishment and enforcement of a legal framework. In developing actions to protect human health and the environment from POPs chemicals within the context of a market economy, the Convention stresses the need to develop and promote a range of voluntary actions. Developing successful positive drivers for change will require stakeholder to be involved in their formulation. The project will take full advantage of the experience of other development activities in order to establish successful initiatives, the group representing the donor and development partner communities will be of value in this regard.

35. An important aspect of participation is empowerment through capacity building, public awareness and education, particularly in those groups most at risk from exposure to POPs chemicals. Capacity building within MOEF and its cooperating departments that started during the PDF-B phase of the project will continue. A technically sound, feasible and knowledge based approach that satisfies the needs of all concerned stakeholders will be developed. However, considering the scale of work to be undertaken and the limited duration and financial resources available, it is not feasible to address all of India's capacity building requirements in terms of the Convention within the full project. For this reason, a proposal for a long-term Capacity Building Programme will be developed in parallel with the NIP. Donors will be invited to participate in this long-term partnership to ensure that sustainable capacity is built not only at national level but also amongst relevant officials and stakeholders at provincial level and below.

e. MONITORING AND EVALUATION

36. The National Steering Committee (NSC) has already been constituted in the MOEF and the same will be engaged in the execution of the full project. A coordination cell to oversee the implementation of the project activities would be set up which, amongst others, would ensure compliance of the various provision contained in the Stockholm Convention in all its aspects.

37. Coordination between India's development partners will continue and facilitate the integration of successful operational experience in the development of strategies and action plans required as elements of the NIP.

38. Provision has also been made for the establishment of a National Expert Review Group (NERG) to undertake independent technical reviews at key milestones of the project. The review group will report its findings to the NSC.

39. Formal monitoring and evaluation of the project will follow the procedures set out in the GEF Monitoring and Evaluation policies and procedures. UNIDO, as executing agency, will be responsible for the preparation of Annual Project Implementation Reviews (PIR). UNIDO will also make arrangements for an independent international mid-term evaluation of the project according to Monitoring and Evaluation procedures established by the GEF. The NSC and their partners will use the results of these reviews to inform project implementation planning in subsequent phases of the project. UNIDO will also make arrangements for the independent international terminal evaluation of the project.

40. Ultimately, the success of the project will be measured by the endorsement of its principal outcome, the National Implementation Plan, by the Government and its successful review by the Conference of Parties of the Stockholm Convention.

4. FINANCING (for all tables, expand or narrow table lines as necessary)

a) PROJECT COSTS

Project Components/Outcomes	Co-financing ($)	GEF ($)	Total ($)
1. Convention implementation infrastructure at national and state levels	1,010,000	1,023,600	2,033,600
2. Measures in relation to DDT, the only POP pesticide currently being produced and used in India	231,800	256,100	487,900
3. Measures in relation to PCBs	883,200	291,600	1,174,800
4. Measures in relation to unintentionally produced POPs	237,400	774,000	1,011,400
5. Measures in relation to wastes and contaminated sites	2,000,000	735,800	2,735,800
6. Project management and monitoring & evaluation budget/cost*	2,717,600	160,000	2,877,600
Total project costs	**7,080,000**	**3,241,100**	**10,321,100**

* This item is an aggregate cost of project management; breakdown of this aggregate amount should be presented in the table b) below.

b) PROJECT MANAGEMENT BUDGET/COST[2]

Component	Estimated staff weeks	GEF ($)	Other sources** ($)	Project total ($)
Locally recruited personnel*	170	135,000	-	135,000
Internationally recruited consultants*	100	0	200,000	200,000
Office facilities, equipment, vehicles and communications		-	-	-
Travel		25,000	-	25,000
Miscellaneous			-	
Total	**270**	**160,000**	**200,000**	**360,000**

* Local and international consultants in this table are those who are hired for functions related to the management of project. For those consultants who are hired to do a special task, they would be referred to as consultants providing technical assistance. For these consultants, please provide details of their services in c) below:

** Other sources exclude the Government of India's project management costs.

[2] For all consultants hired to manage project or provide technical assistance, please attach a description in terms of their staff weeks, roles and functions in the project, and their position titles in the organization, such as project officer, supervisor, assistants or secretaries.

C) CONSULTANTS WORKING FOR TECHNICAL ASSISTANCE COMPONENTS:

Component	Estimated staff weeks	GEF ($)	Other sources ($)	Project total ($)
Personnel	17,300	-	5,078,200	5,078,200
Local consultants	1,200	1,050,700	-*	1,050,700
International consultants	266	401,300	-*	401,300
Total	**18,766**	**1,452,000**	**5,078,200**	**6,530,200**

* Other sources exclude the Government of India's project management costs.

LIST OF CONSULTANTS FOR PROJECT MANAGEMENT AND TECHNICAL ASSISTANCE COMPONENTS:

Consultant	**Description**	**Estimated staff weeks**
Int'l POP Pesticides	Preparation of inventory and reporting	36
Int'l PCBs expert	Preparation of inventory and reporting	36
Int'l Dioxins and Furans	Preparation of inventory and reporting	36
Int'l Waste management	Waste identification and management	36
Int'l Pesticide Stockpiles	Stockpiles identification and management	30
Int'l Chemical management experts	POP management system	20
Int'l Analytical expert	Analytical consultancy on testing procedures	16
Int'l Medical waste expert	Identification and evaluation of the existing system in the country	24
Int'l Policy expert	Reviewing the existing policy and framework and suggest necessary changes	16
Int'l Legal expert	Review the legal provisions to manage POPs	16
Project Management expert	Managing and implementing project on day to day basis	104
Project support staff	Support to the project management implementation	66
Nat'l POP Pesticides (2 experts)	Collation of data for preparation of inventory, and reporting	192
Nat'l PCBs expert (2 experts)	Collation of data for preparation of inventory, and reporting	192
Nat'l Dioxins and Furans (2 experts)	Collation of data for preparation of inventory, and reporting	192
Nat'l Waste management (2 experts)	Waste identification and management	144
Nat'l Pesticide Stockpiles (2 experts)	Stockpiles identification and management	144
Nat'l Chemical management expert	POP management system	96
Nat'l Analytical expert (2 experts)	Analytical consultancy on testing procedures	48
Nat'l Medical waste expert (2 experts)	Identification and evaluation of the existing system in the country	96
Nat'l Policy expert	Review the country's policy and framework and prepare necessary legal documents	48
Nat'l Legal expert	Review the legal provisions to manage POPs	48

d) CO-FINANCING SOURCES (expand the table line items as necessary)

Co-financing Sources				
Name of co-financier (source)	Classification	Type	Amount ($)	Status
Ministry of Environment and Forests	Nat'l Gov't	in cash/in kind	$ 6,880,000	Confirmed
UNIDO	Impl. Agency	in kind	$ 200,000	Confirmed
Sub-total co-financing			**$7,080,000**	

Note on the co-financing letter from the Government of India

The Government of India has so far anticipated an in-cash/in kind contribution of US$ 7.630 million to the project as confirmed in their co-financing letter dated 14 February 2007. US$ 6,880,000 is committed to the proposed NIP project and the difference (US$ 750,000) will be used to start the post-NIP programme development in parallel with the NIP development.

The Government of India, being one of the classified 4 large countries that would receive full-sized project GEF supported NIP, has recognized that post-NIP activities could equally start in the same way as China experience has been made.

India enjoys a large network of specialized research institutions focusing on the above-mentioned projects domain and it was felt that there are enough technical data and information within these institutions to enable fast development of post-NIP activities.

India has several specialised NGOs on chemicals management and community-based environmental and health organizations that have international reputation in positive engagements and greatly contributed to the global and regional public awareness and information dissemination efforts. Conforming to the call of several environmental agreements, these society groups urged the government to take immediate implementation actions after the ratification of the Stockholm Convention by the Government of India and generate project activities rather than to wait for external financial and technical support in the areas of environment and health protection.

India is a populated country that has strong federal and decentralized governments where decision-making is rooted towards the responsibilities of the local authorities. Therefore, resources are available to kick start the post-NIP projects in hotspots and sensitive fragile ecosystems already identified by the local authorities.

In an encouraging effort, UNIDO has agreed with the Government of India to provide seed money to cover the international consultancy requirements to meet the programme development obligations of the 2 major post-NIP projects on Medical waste disposal and Sound management of PCBs.

5. INSTITUTIONAL COORDINATION AND SUPPORT

a. CORE COMMITMENTS AND LINKAGES

Commitment of India

41. India has signed and ratified the Stockholm Convention on POPs and recognizes its obligation, under Article 7 of the Convention, to develop and transmit a NIP to the Conference of Parties within two years of entry into force of the Convention in the country. The country is committed

to start the compilation of the NIP as soon as the necessary technical and financial support from the international community is provided in accordance with Article 3 of the Convention. The preparatory project, to identify the requirements for developing the NIP, has been implemented successfully by the Ministry of Environment and Forests through the Industrial Toxicology Research Centre, Lucknow with the assistance of UNIDO under a PDF-B grant from the GEF. This Project Brief is the principal outcome of that preparatory project.

Commitment of UNIDO

42. UNIDO is committed to assisting its developing country Member States with regard to meeting the obligations of the Stockholm Convention. The GEF has approved Enabling Activities proposals submitted by UNIDO for 40 countries including India and China that have opted to undertake NIP development through the GEF full project cycle. In addition, UNIDO is executing or developing a range of demonstration and capacity building projects geared to support the Convention implementation. UNIDO has committed considerable effort to build this assistance programme. This commitment is based on a clear understanding that such activities are compatible with UNIDO's mandate and Corporate Strategy and lead towards the Millennium Development Goals (MDGs).

43. India is one of UNIDO's largest recipients of technical cooperation assistance. Activities undertaken in India by UNIDO include a range of measures related to investment, industry efficiency and waste management. The experience gained in these projects will be of relevance in the development of India's NIP.

b. CONSULTATION, COORDINATION AND COLLABORATION BETWEEN IAS AND EXAS, IF APPROPRIATE

44. Once the project is approved and key milestone elements are built in the organizational structure to enable close consultation, collaboration will be maintained at various levels in the country. Consultations and collaboration with WHO, FAO, the Basel Convention Secretariat, the Stockholm Convention Secretariat and the GEF Secretariat will be maintained through UNIDO and also directly through their local representatives. The Government of India has been maintaining close coordination with the GEF agencies as well as other UN agencies on multi-million dollar programme of technical cooperation undertaken with the World Bank, WHO, Integrated Pest Management with FAO, on-going work on cleaner production and solid waste management and Regional Network on Pesticides for Asia and the Pacific (RENPAP) with UNIDO. Prior to the initiation of the PDF-B project, the Government of India carried out an extensive consultation with the GEF agencies through the organization of the Expert Group Meeting sponsored by the World Bank focusing on the status of POPs in India in which UNDP and UNEP also participated. While preparing the PDF-B project, all stakeholders including the GEF agencies were involved in 10 workshops organized by the ITRC in selected parts of India.

c. PROJECT IMPLEMENTATION ARRANGEMENT

45. India invited *UNIDO* to act as *GEF Executing Agency with Expanded Opportunities* for the development of the NIP. During the PDF-B phase, UNIDO has assisted MOEF through the provision of timely assistance at key phases, in the review of inventories and reports prepared as outcomes to the project and in guiding MOEF in relation to the requirements of the Stockholm Convention and GEF procedures. UNIDO is also responsible in the overall management of the project and its funds.

46. The *Ministry of Environment and Forests* (MOEF) is the nodal agency for planning, promoting and coordinating environmental programmes. MOEF is the focal point for the Stockholm

Convention and the GEF. MOEF has over 20 years experience in the development, implementation and managerial oversight of projects and programme funded by various MEAs and their funding mechanisms, including the GEF. It has wide experience of collaboration with various intergovernmental organizations, bilateral donors and enterprises in India. It has acted successfully as the national executing agency of the PDF-B phase of the project and is currently establishing convention implementation measures that are intended to be permanent. For the execution of the project, MOEF will engage 5 institutions specialized in the field of pesticides, PCBs, dioxins and furans, analytical and legal.

47. The *National Steering Committee* (NSC) already constituted within MOEF represents the nucleus for sustainable and integrated management of the Convention implementation activities. The NSC will be responsible for planning, guidance and monitoring all actions needed for the compliance of the provision of the Stockholm Convention. It would delegate appropriate authorities namely the National Project Director (NPD) as head of the Project Management Committee (PMC) and relevant specialists who will be responsible for the day-to-day project implementation and for this a core cell will be formed within the MOEF. This cell would coordinate the project activities to ensure compliance of the various provisions contained in the Stockholm Convention in all its aspects. The PMC will manage all local elements of the project included, for example, the recruitment and supervision of local experts subcontractors preparing component technical inventory and recommendations and drafting of the project outputs. It will cooperate with UNIDO for the procurement and delivery of project inputs and the organization of project activities. The PMC will prepare periodic forward planning, progress and financial reports through MOEF to UNIDO. It will provide support for India's representatives to the COP (described in Article 19) and its review committees and be responsible for vertical coordination with local and state government representatives and stakeholders representing public, industry, academia and other groups. The PMC will be charged with fulfilling the national review, reporting and information exchange obligations set out in several articles of the Convention.

48. A *National Project Director* (NPD) responsible for day-to-day project management will be required and supported by the core cell that will be formed within the MOEF.

49. In view of the complex nature of the full project and its many and diverse components, UNIDO will establish a project focal point in its existing Regional Coordination Office (RCO) in Delhi to facilitate the project execution. This focal point will comprise of a small team of dedicated staff for technical backstopping and project management on day-to-day basis. The focal point will also render the services of a National Project Management Expert and would be supervising the development of the NIP. The RCO in Delhi with its network in the countries of the Asia-Pacific region will ensure exchange of experiences and expertise between India and other countries of the region and beyond, as well as ensure national awareness of regional initiatives on POPs. It will also benefit from the part-time services of professional and support staff colleagues, in particular of senior staff engaged in the management and coordination of UNIDO's programme of support to the Stockholm Convention, which UNIDO will make available as its in-kind contribution to the project.

ANNEX A: INCREMENTAL COST ANALYSIS

In order to comply with the various provisions under the Stockholm Convention, the proposed project has been designed to incorporate actions required within the institutional and regulatory framework existing in India. These actions, therefore, would invite incremental costs which otherwise would not have been required had the Convention not been ratified by the Government of India. Therefore, the incremental costs are required to be incurred primarily to undertake various future actions, which otherwise would have had to be incurred by India, as well as globally, in addressing various human health problems as well as for remediation of environmental damages caused by POPs chemicals.

In accordance with Article 13 of the Stockholm Convention, the incremental costs to undertake such Enabling Activities are fully borne by the international community through the GEF in respect of most of the developing countries. While the Government of India would provide the major co-financing for the proposed activities through the GEF project cycle, financing from the GEF will ensure that all the necessary components of the project are undertaken in a time bound manner through provision of the required support for essential coordination, integration and capacity building activities.

The continued use, disposal and release of POPs chemicals into the environment would essentially risk the environment and human health if urgent actions were not initiated in India. Also, because of the massive size of the chemical industry in action by a country like India, it will certainly weaken the global accord established in the Stockholm Convention.

Within the time limit specified in Article 7 of the Stockholm Convention, India will not be able to fulfill its obligations to provide a NIP to the Conference of Parties if urgent actions are not taken thereby seriously upsetting India's abilities to meet the major obligations under the Stockholm Convention.

The Government of India has already incurred significant baseline expenditures while preparing itself to become party to this Convention with the establishment of coordination and administrative arrangements at different governmental levels and investments in upgrading laboratories and research centres for undertaking basic work on POPs chemicals and their alternatives.

India has already spent significant amount of money through its actions particularly in multi-million dollar programmes of technical coordination undertaken with the World Bank, WHO, Integrated Pest Management with FAO and on-going work on cleaner production and solid waste management and Regional Network on Pesticides for Asia and the Pacific (RENPAP) with UNIDO. All these experiences and other similar associated programmes will provide invaluable support to the proposed project.

Summary Cost Matrix in US$

Component	Alternative	GEF	Co-finance India	Co-finance UNIDO
Convention implementation infrastructure	2,033,600	1,023,600	1,010,000	-
Measures to eliminate production, use and trade of DDT	487,900	256,100	231,800	-
Measures in relation to PCBs	1,174,800	291,600	883,200	-
Measures in relation to unintentionally produced POPs	1,011,400	774,000	237,400	-
Measures in relation to wastes and contaminated sites	2,735,800	735,800	2,000,000	-
Project Management and Monitoring & Evaluation	2,877,600	160,000	2,517,600	200,000
Total	**10,321,100**	**3,241,100**	**6,880,000**	**200,000**

The GEF Alternative:

The GEF alternative (GEF contribution plus co-financing) for each component is given based on the estimated barrier cost. For Convention implementation structure the GEF alternative will provide **US$2,033,600**; for measures to eliminate production, use and trade of DDT, **US$487,900**; for measures in relation to PCBs, **US$1,174,800**; for measures in relation to unintentionally produced POPs, **US$1,011,400**; for measures in relation to wastes and contaminated sites, **US$ 2,735,800**, and for project management and monitoring & evaluation, **US$2,877,600.**

ANNEX B: PROJECT LOGICAL FRAMEWORK

Hierarchy of Objectives (Intervention logic)	Objectively verifiable Indicators of Achievement	Means (Sources) of Verification	Assumptions and Risks
Goal			
Human health and the environment protected from POPs	Human and environmental burdens of POPs decline with time	Global, national and provincial health and environmental status reports	Reliable monitoring continues over suitable timeframe
Purpose			
Stockholm Convention obligations met by India	Convention targets for national production, use, and trade; Fewer sources and reduced releases of POPs meeting Convention targets	Periodic reports to Conference of Parties; national environmental status reports; industry performance indicators	Financial and human resources available to sustain management and investment needs identified in NIP
Objectives/Results			
1. National Implementation Plan (NIP)	NIP submitted to Secretariat within 2 years of Convention entry into force	NIP available at Secretariat	Government endorses NIP
2. Partnership Programme for Capacity Building	Partnership Programme proposal submitted to GEF by project completion date	Partnership Programme entered to GEF Work Programme database	Capacity Building remains a GEF eligible/donor funding priority
3. Case Studies and Demonstration Projects	Viable methods and techniques to address India's priority actions developed, evaluated and demonstrated by project completion date	Action plans and investment projects included in NIP	Successful stakeholder participation and coordination; Techniques evaluated are viable in India

Activities			
Objectives (Intervention logic)	**Verifiable Indicators of Achievement**	**Means (Sources) of Verification**	**Assumptions and Risks**
1. Convention implementation infrastructure at national and state levels			
1.1 Develop and implement national management system for Stockholm Convention compliance 1.2 Draft, review and gain endorsement for the NIP 1.3 Develop national and state level policy, legal, regulatory and promotional frameworks to meet Convention requirements 1.4 Develop information exchange, public awareness and education strategies 1.5 Develop R&D and monitoring strategies	- Management and information management systems functioning at national level and instigated at State level by project end. - NIP and component action plans and strategies finalized and endorsed by stakeholders and government by project end. - Legal and regulatory evaluations of Activities 1.2-1.5 integrated and national and state level recommendations developed by project end. - Information exchange centre established; strategy for state level information dissemination developed; public awareness campaigns devised; education strategies developed. - Reviews of national R&D capacity; recommendations for strengthening national R&D. - Assessment of impact of current POPs burden on human health and its implications for national development.	- Project reviews; progress reports; COP participation; reports to Stockholm Convention Secretariat and to the Government. - NIP, action plans and strategies, priority investment portfolio. - Contributions to sustainable development policies; Country Assistance Strategy; NIP; submissions to legislative bodies. - Information exchange centre; targeted public information materials. - Revised curricula at different levels of education. - Number of R&D programs funded at national level.	- Government stakeholders willing to participate and cooperate. - COP and Stockholm Convention Secretariat provides reporting standards and formats. - Official support for mainstreaming of POPs/chemicals issues into development strategies. - User networks (public health, agricultural extension, etc.) willing to participate. - R&D Centres and networks willing to participate and collaborate. - Suitable cohort identified and recruited.
2. Measures in relation to DDT – the only POP pesticide produced and used in India			
2.1 Develop measures to restrict and/or eliminate production, use and trade of DDT.	- Inventories and information system components, reduction and phase-out strategies and capacity building completed by project end.	- Inventories of production, use and trade.	- Inventory information forthcoming.

Activities			
Objectives (Intervention logic)	**Verifiable Indicators of Achievement**	**Means (Sources) of Verification**	**Assumptions and Risks**
	- Preliminary inventory of stockpiles completed.	- Regular reporting on DDT to COP and Stockholm Convention Secretariat.	- Conflicting interests of stakeholders (manufacturers, users, etc).
2.2 Develop measures in relation to stockpiles of/ or containing, intentionally produced POPs.	- Guidelines for stockpile management developed. - Inventories and information system components, reduction and phase-out strategies and capacity building completed by project end. - Preliminary inventory of stockpiles completed including DDT (its precursors and intermediates) contaminated sites/hotspots. - Guidelines for stockpiles management developed.	- Information management system, reduction and phase-out strategy, findings disseminated to stakeholders. - Inventories of production, use and trade.	- Effective alternatives or integrated methods to replace POPs identified and viable. - Industry and market acceptance of improved products with reduced POPs residues. - Stakeholders willing to participate and report.
3. Measures in relation to polychlorinated biphenyls (PCBs)			
3.1 Prepare a preliminary national inventory of PCBs and equipment containing PCBs. 3.2 Develop and demonstrate a detailed PCB inventory methodology and a draft strategy on PCB reduction and disposal. 3.3 Build capacity in PCBs management.	- Preliminary national inventory of PCB wastes and equipment in use completed. - Preliminary surveys at state levels completed. - Strategies for the phased removal from use of PCB-containing equipment developed. - Detailed inventories of PCB wastes, out-of use equipment and contaminated sites/hotspots. - Environmentally sound waste management strategies developed. - Pilot training programme established; national training programme developed.	- Preliminary inventory included in information management system. - Capacity assessed for undertaking any phase out programme under the requirements of the Convention. - Draft regulatory instruments; preliminary inventories within NIP. - Environmentally sound waste management strategies disseminated to stakeholders. Priority investment portfolio within NIP.	- Records of equipment in use kept and shared. - Records of safekeeping sites traced. - Techniques for environmentally sound waste management are viable and implementable within Convention targets. - Stakeholder participation secured.

Activities			
Objectives (Intervention logic)	**Verifiable Indicators of Achievement**	**Means (Sources) of Verification**	**Assumptions and Risks**
		- National training programme proposal developed for PCBs identification, inventories, analysis and disposal work.	
4. Measures to reduce or eliminate releases of unintentional production of POPs			
4.1 Develop measures for the progressive reduction of releases and elimination of sources of unintentionally produced POPs	- Legal, regulatory and promotional schemes developed and disseminated to stakeholders. - Key sectors identified and investment plans developed.	- Draft regulatory instruments and industry promotion schemes. - Releases and elimination inventory reports to CO-P. - BAT/BEP Guidelines and Guidance disseminated to stakeholders. - Priority investment portfolio within NIP in key industry sectors.	- BAT/ BEP guidelines and guidance provided to Parties. - Active participation of suitable enterprises secured.
5. Measures in relation to wastes and contaminated sites			
5.1 Develop and implement strategies for identifying and managing wastes consisting of containing or contaminated by POPs. 5.2 Develop measures to identify sites contaminated by POPs.	- Inventory, risk assessment and environmentally sound management options developed and disseminated to stakeholders. - Contaminated sites and hotspots identified. - Inventory and risk assessment methodology developed and disseminated to stakeholders. - Evaluation of laws, amendments in policies, strengthening and capacity building completed.	- Inventory reports to Government and COP; Management guidelines - Inventory methodology to Government and COP. - Education and awareness media	- Information from waste owners and site operators forthcoming. - Liability issues clarified. - Viable and implementable techniques for environmentally sound management accepted by COP. - Information from stakeholders forthcoming.

Activities			
Objectives (Intervention logic)	**Verifiable Indicators of Achievement**	**Means (Sources) of Verification**	**Assumptions and Risks**
6. Project Management and monitoring			
6.1 Establish project management and implementation arrangements. 6.2 Operate project review, monitoring and evaluation mechanism.	- National Steering Committee, Project Technical Coordination Group and UNIDO existing RCO in Delhi operational and strengthened. - National Expert group established. - Implementation plans, progress management and financial reports, outputs delivered on time and within budget. - National Steering Committee reviews; annual review; project completion review.	- Letters of agreement between UNIDO and Government of India; implementation plans; progress reports. - Periodic technical reviews; Annual Project Implementation Reviews; Terminal Evaluation.	- Project approved and funds transferred from GEF without delay. - Agreement over implementation arrangements. - Components implemented on time and do not impact on overall delivery. - Good coordination between components

ANNEX C: RESPONSE TO PROJECT REVIEWS

a) Convention Secretariat comments and IA/ExA response

none received

b) STAP expert review and IA/ExA response

Subject of the Review:

Project name: Development of a National Implementation Plan in India as a first step to implement the Stockholm Convention on Persistent Organic Pollutants (POPs)

Evaluated documents:

Project Executive Summary, Annexes, Project brief proposal

Evaluation:

The subject of this evaluation is a draft of the National Implementation Plan (NIP) of the Stockholm Convention on Persistent Organic Pollutants (POPs) in India.

India recognizes its obligation, under Article 7 of the Convention, to develop and submit a NIP to the COP. As such, India is committed to complete and deliver its NIP within the timetable set out in the Convention. The NIP was prepared based on the GEF project proposal, which is a Annex 7 of the NIP

The NIP for India is to be developed keeping in mind the specific requirements of the country. The focus is on socio-economic aspects, sustainable development and environmentally appropriate policies and actions.

Based on the project time schedule, India was committed to starting the compilation of the NIP. As such, the country invited the United Nations Industrial Development Organization (UNIDO) to act as GEF Executing Agency with expanded opportunities for the development of the NIP and opted to undertake this work in two phases through the full GEF project cycle rather than by taking up the so-called 'Enabling Activities'

A coordinating mechanism drawing together India's international development partners was established to ensure that NIP development takes full advantage of the findings and experience of associated projects and programmes executed by intergovernmental organizations and bilateral donors. Studies of exposure and health impacts of POPs on living systems and of integrated approaches for the replacement of POPs, as well as further capacity building to improve the management of PCBs wastes, and the assessment of sources, releases and pathways of unintentional by-products will be undertaken during the full project.

The National Experts Committee for the project identified five representative zones covering 16 states in the country for core assessment and nation wide projections on POPs and POP-related activities. With a view to developing questionnaire-based methodology to undertake inventories of sources, releases, contaminated sites, etc. of POPs, workshops were organized in each zone to discuss technical aspects with relevant stakeholders (private sector representatives of large, medium and small enterprises, industrial and agricultural associations, academic institutions, testing laboratories, public institutions and Government bodies).

A series of five interactive workshops, one in each zone, were organized for representatives of national as well as the States and Union Territories' infrastructure of Government institutions, commerce and industry, public and private testing laboratories, research institutes, enforcement entities, public health institutes, non-governmental organizations (NGOs) and other associations that are relevant to the implementation of the Stockholm Convention, to facilitate assessment of regulatory control, enforcement capacity, research and development, health and environmental risks and also assess capacity building needs.

Current POPs status in the country is clearly summarized in the NIP Project Executive Summary (NIP_ES) and deeply described in the Annexes 1 – 6 (NIP_AN).

The structure of NIP is not strictly done by UNEP/WB Guidance as UNIDO strictly ask in the previous cases. It means that I will not discuss the former structure of the Indian NIP, which is different the Guidance recommendations, but the contents of the Indian NIP. The issue of formal structure was very artificial and it is not so important. Maybe any version of Guidance exists now, but I have not any knowledge about this.

The Stockholm Convention's goal for those intentionally produced substances listed in Annex A (pesticides and industrial chemicals) is elimination of their production and use. Article 3, "Measures to reduce or eliminate releases from intentional production and use" is the central mechanism for achieving this goal. It requires the Parties to prohibit and/or take the legal and administrative measures necessary to eliminate substances listed at Annex A. The assumption is that proof of adopting these practices will be found in legitimate legislation, regulation, orders or other authoritative instruments of the Party's system of government.

Again the both part of the Indian NIP (NIP_ES and NIP_AN), summarize and describe all relevant information and problems which are connected with the POPs issues as far as intentionally and unintentionally produced substances, stockpiles, wastes and sites contaminated by POPs. Based on my knowledge concerning to POPs problems in India, this description is sufficient.

Other parts clearly describe India's policies and legislative framework relevant to POPs, important issue of the development of India's environmental legislation and India's regulatory framework for the safe management of hazardous chemicals. All these chapters are prepared very detailed and give a good overview of the POPs problems in the country.

Project proposal and the NIP mention that although sustainable development is taken as a fundamental policy principle, there are few barriers in effectively meeting the obligations of the Stockholm Convention in India. Local development strategies continue to emphasize economic growth promoting increased employment to meet the people's need for basic necessities and higher quality of life in the face of population growth pressure. Several of industrial units are inefficient and can neither afford end-of-pipe treatment, nor take up precautionary measures within-process changes. Many provisions of important Indian environmental laws are policy pronouncements and have not defined individual responsibilities for compliance. Administrative guidelines issued by one body may be in conflict or contradiction to those issued by another one. State Pollution Control Boards and other responsible bodies lack adequate monitoring facilities and have limited access to legal expertise. The enforcement is not adequate which affects the efficacy of environmental laws and standards.

Existing national standards are adequate enough to meet the requirements of specific instruments such as the Convention. But still some barriers exist and they are, I think very well, described in the NIP. Overcoming these barriers and integrating the requirements of the Convention will require considerable and long-term capacity building at the national, state, district and taluka levels within government and more widely across industry and a variety of key stakeholder communities.

Project Brief mentioned that any formulation or enforcement of laws or regulations to meet the obligations of the Stockholm Convention will need to be established within the general policy and legislative framework set out above in order to contribute towards India's overall development objectives. A preliminary review undertaken during the PDF-B phase indicated that there are elaborated laws for pollution control and environmental protection but no specific law addressing the elements of the Stockholm Convention. Also, there will be a need to incorporate the obligations of the Convention in national chemicals registration schemes as well as into a wide range of other legislations governing the industry and chemicals production, use, trade and disposal.

Project NIP-ES summarized that a comprehensive study is now required to identify those obligations set out in the Stockholm Convention that are not met by current regulatory instruments and to recommend additions or amendments to ensure that India can expeditiously meet its obligations and reporting requirements. India will also need to identify those priority programmes and areas where additions to mainstream the control of POPs could play a role in supporting sustainable development nationally as well as India's contributions to international efforts to protect human health and the environment.

In each case, a methodology for their adaptation to meet the needs of the Convention and for their successful and effective implementation will need to be developed. In this regard the social and economic impacts associated with the continuing use of the chemicals listed in the Convention, and the consequences of any control measures established to eliminate or restrict their production and use, and to manage their destruction or disposal by environmentally sound means will need to be studied and evaluated. Such a study or studies, based on the parameters set out in Annex F of the Convention, would need to take account of the differing capacities and conditions of India's different regions.

In addition to changes to the legislative framework, a wider range of mechanisms, including education and information dissemination, capacity building and promotional schemes for industry will need to be considered to ensure that Convention obligations can be met in an increasingly diversified market-led economy.

The overall objective of the full project is to develop the NIP for India to meet its obligation with the Convention. To stand by this commitment, the Project will establish inventories on the production, use trade, stockpiles and wastes of, and sites contaminated by, the chemicals listed in the Annexes of the Convention and existing in India; develop strategies and action plans for the reduction and elimination of the chemicals listed in Annexes of the Convention, which exist in India.

NIP assess infrastructure capacity and propose management options, including institutional arrangements, regulatory frameworks, and requirements for capacity building, raising stakeholder awareness and research and development, to ensure the effective and sustainable implementation of the proposed strategies and action plans and thus facilitate India's preparedness for compliance with the Convention.

NIP formulates and gains stakeholder endorsement for a NIP, including priorities and objectives with the aim of estimating the total costs and the additional costs likely to be incurred for introduction into development and assistance planning.

NIP also builds sustainable capacity sufficient to prepare the NIP and its component inventories, strategies and action plans, and to fulfill ongoing reporting requirements of the Convention, develops and demonstrates methodologies representing practical and feasible approaches to priority actions required by India in meetings its Convention obligations.

Very important part of NIP is focused on the detailed description of capacity building at the national, state and district levels is needed in India. A long-term Capacity Building Programme addressing POPs issues therefore needs to be developed for donor funding. The goal of the NIP based on the goals of the SC is to

protect human health and the environment from persistent organic pollutants. The purpose of the project is to enable India to take the first steps towards implementation of the Convention.

Its principal output was to develop a comprehensive National Implementation Plan (NIP) incorporating an assessment of the national baseline with regard to POPs chemicals incorporating preliminary inventories of POPs chemicals currently in production and use, of PCBs and equipment containing PCBs, of unintentional production of POPs, of human exposure of POPs and health impacts, of research and development capabilities, and of regulatory and institutional frameworks relating to POPs and chemicals management and control.

NIP describes the management strategies, action plans and investment needs required by India to meet the obligations of the Convention including the methodology for the identification of sites contaminated by POPs or products containing POPs.

Indian NIP gives a great attention to a capacity Building Programme proposal to meet India's long term institutional strengthening and capacity building needs.

Part of the future steps is also a development of the management and information systems functioning at national level and instigated at state level. Important activity in this filed is an establishment of the national information centre and information dissemination and public awareness and education campaigns developed.

An attention was also given to the realization of a pilot study concerning to investigation of the exposure to POPs and their adverse effects with special emphasis on the health of women and children and other high risk groups with the vastness of India's genetic diversity, environmental genomic based molecular epidemiology for POP affects.

Also a research study on non-POP alternatives for vector control must be done in the near future, similarly as a pilot project to develop a detailed inventory methodology for PCBs.

Part of management of POPs issue in India is a preparation of a pilot capacity building programme on PCBs management and a demonstration of methodologies to promote the implementation of best available techniques (BAT) and best environmental practices (BEP) to reduce unintentional production of POPs in key sectors of industry.

The other part of NIP_ES consists from Specific Project objectives and activities.

To achieve the outputs, the activities of the project have been grouped into a series of work packages each focused on a specific objective as follows:

- Convention implementation infrastructure at national and state levels
- Measures in relation to DDT currently being produced and used in India
- Measures in relation to polychlorinated biphenyls (PCBs)
- Measures in relation to unintentionally produced POPs
- Measures in relation to wastes and contaminated sites
- Strategy for capacity building and institutional strengthening
- Project Management overview

Every objective has defined special output and every output has some activity for realization of the objectives. Structure is logically based on the structure and Annexes of the SC.

For example the development and implementation of the national management system for the Stockholm Convention compliance is focused on the forming of the National Steering Committee (NSC) which will

harmonize the interests and standpoints of different ministries, state administrations and commissions as well as to determine the position of the Government of India with regard to POPs issues.

Important and for the NIP future realization is very important to support strong and effective co-operation among the stakeholders, ministries and other relevant bodies, preparation of common projects and activities such as a increasing of the public awareness of POPs issues related to human health determine, in conjunction with the Ministry of Health, WHO and other stakeholders, in particular women's groups, appropriate educational schemes to raise the awareness of the hazard posed by the inappropriate use and management of POPs chemicals in public health and disease vector control programmes; and devise appropriate programmes and materials that can be delivered, for example through the public health network, to promote the safe handling and use of those POPs chemicals remaining in use, environmentally sound alternatives to POPs, or integrated disease management techniques minimizing or eliminating the need for POPs chemicals.

Generally, the activities, which are focused to the increasing of the public awareness of POPs issues related to agriculture and industry are extremely important in the so large country such as India.

I think that for the future development of the country are also very important all activities which are focused on the research and development and monitoring strategies. Similarly as exposure risk assessment study of POPs which will collect available information on the adverse health effects of POPs from national and international studies; study exposure and affect to high risk groups such as women and children needs specific study, will be extremely important for health care of Indian population. This part of NIP is very comprehensive and clearly described what country needs.

Other important issue is focused on the in the Indian case important issue which is the development of the measures to restrict and/or eliminate production, use and trade of DDT.

All other objectives and connected activities sufficiently covered the SC goals and affairs which country needs. I have no additional comments.

The Appendixes very detailed described the POPs problems in India based of the Annexes of the SC. The first is focused on the problems of pesticides in India, probably the most serious POPs problem in India. This Appendix defines the Priorities and objectives for OCPs management in India. The study was executed in 5 Zones covering 16 States of the country to get a representative idea of the different geo climatic zones, industrialized areas and intensive agricultural land. Similarly as in the case of Annex 2 this part was focused on the establishment of POPs inventory and assessment of national infrastructure and capacity, preparation of a National Profile, preliminary inventory of POPs production, distribution, use, import and export; preliminary inventory of POPs stocks and contaminated sites and products; assessment of capabilities for disposal of obsolete stocks; preliminary inventory of POPs releases to the environment; assessment of infrastructure capacity and institutions to manage POPs, including regulatory controls, and chemical analytical reference laboratories; needs and options for strengthening them; assessment of enforcement capacity to ensure compliance; assessment of social and economic implications of POPs use and reduction, including the need for the enhancement of local commercial infrastructure for distributing benign alternative technologies/products; assessment of monitoring and research and development, and chemical analytical capacity; and identification of POPs-related human health and environmental issues of concern; basic risk assessment as a basis for prioritization of further action taking into account, inter alia, potential releases to the environment and size of exposed population.

All points based on the SC Annexes and recommended structure of the NIP. Annexes summarized clearly and detailed all cases mentioned in the SC annexes. There is a setting of priorities and determination of objectives, development of criteria for prioritization, taking into account health, environmental, and socio-economic impact and the availability of alternative solutions; and determination of national objectives in relation to priority POPs or issues.

The description of impacts of Pesticidal POPs in India and connected environmental risks and health hazards presents the level of pesticidal POPs in environment, animal and human tissues. However, the monitoring was found to be "one-time monitoring" that means there were almost no regular – continuous studies and follow ups in most of the regions of the country. Therefore, it was not possible to observe any meaningful trends. The data are inadequate to conclude meaningfully.

Management of POPs Pesticides in India is described in the context of relevant statutes on management of POPs pertaining to Pesticides, regulation to handle hazardous chemicals safely.

India has the required legal regulations for restriction of manufacture/usage of POPs candidates in India. The Manufacture, Storage and Import of Hazardous Chemicals Rules 1989, The Hazardous Waste (Management and Handling) Rules 2003 and The Insecticides Act are very important regulations.

As only one pesticide product – DDT – out of 9 POPs pesticides being manufactured in India, it is easy to implement the Stockholm Convention with respect to pesticides. Moreover, there is only one manufacturer of DDT and it is also under the Public Sector. To have an effective implementation of various rules, a coordinated effort of the different statutory agencies involved – Central Insecticides Board/Ministry of Environment and Forests / Pollution Control Board / Agricultural Departments – is required.

Other POPs pesticides in India are banned from use, production, import or export in India, a combination of factors has led to their continued production, trade, use and release into the environment.

The stockpiles of obsolete POPs exist, posing a major threat to the environment, there is no known government programme to monitor them. The State Pollution Control Boards, however, do have the responsibility to identify and notify sites storing hazardous material.

The information on the stockpiles of pesticidal POPs in the country is limited. With the banning of various pesticides, the country has restricted manufacture and usage of the POPs Pesticides. However, certain pesticides were continued to be used even after banning. An extensive investigation is required to establish the total quantity of stockpiles/waste dumping of pesticidal POPs.

India was using large quantity of pesticidal POPs in the past. Large quantities of the various pesticides were being manufactured/formulated/stored/used. This would have created contamination and degree of contamination is to be investigated. Based on the NIP conclusions a long-term strategy that should include identification, management and decontamination of POPs polluted sites, will be prepared.

As far as PCBs in India, the location and quantity of PCB waste and storage are not known. Leakage of PCBs has caused environmental degradation. The quantity of PCBs requiring proper disposal will only be possible when a detailed study is carried out to identify its location.

Although India has conducted many large-scale environment surveys at the national level, data are still insufficient to determine the impacts of POPs on ecological environment. India has many obstacles to overcome to successfully implement the Convention and provide for the effective disposal of PCBs. Most importantly PCBs inventory in India is very necessary, and on that basis, follows the formulation of the strategy on PCBs reduction and phase-out as the guidance for convention implementation within deadline.

Little information is obtained about the import situation of polychlorinated biphenyl raw material and availability of finished product in India. However, the estimated quantity of PCB in India is about 2000 – 4000 MT PCBs

India lacks an effective management system for handling PCBs. There is a need to identify dedicated sites for disposal of PCB containing waste if any are found in the country. Though PCBs are framed under the

Hazardous Waste Management Rules, its concentration in the wastes is not measured and monitored. There is dearth of PCB data availability in the country. Data that exists is scattered and is related to research work by individuals or individual agencies. There is no dedicated manpower to monitor implementation of rules and regulation of hazardous waste.

India never was a manufacturer of PCB. The requirements of PCB for numerous applications were through imports. The problem in India with respect to PCB is due to unaccountability of the used transformer oils and those used in open and partially open applications.

The policies and legislations framed for hazardous waste management need to be practiced. The officials associated with government bodies at the Centre and at the State Level have to effectively implement the rules and regulations.

Only on practicing the existing rules the lacuna if any in the current legislations and policies can be identified. Therefore it is essential to review the existing policies and legislations on PCBs management in the draft NIP stage. Amendments if any, can then be made.

Capability enhancement of the officials and monitoring body on hazardous waste and in particular those concerned with PCB management is required in order to implement the rules and regulations.

The area of great concern is the stockpiles of PCB and PCB contaminated waste if any. Such stockpiles and contaminated sites need to be identified for which a good investigation methodology has to be formulated in the NIP.

A track on the import of PCB and the distribution of imported PCB has to be monitored. In addition to legal import those if at all through illegal trade have to be identified and stopped. Total number of PCB containing transformer and capacitors in use and those defunct has to be identified.

The objective of this project is to develop an inventory methodology based on results of pilot projects and a draft strategy on approaches and options for disposal/reduction of PCB. The draft strategy will provide an assessment of current PCB disposal, reduction, management, policy and regulation and identification of approaches and options (or course of actions) that are suitable for India.

Unintentional by-products - dioxin as a subject is relatively unknown in India as such its populace is yet to realize the gravity of dioxin contamination and its related health effects. No study has been conducted to find out the level of dioxin exposure in India neither are they monitored in the country. Two recent studies, based on human samples, have found that dioxin content is very high in samples of Indian breast milk, meat and dairy products.

Since investigation and monitoring of dioxins and furans is in the inception stage, the supervision and regular observation is also in the dormant state. In addition to this, the rules framed by the government body do not cover dioxin and furans in particular. There are no stringent norms for regular monitoring of dioxins and furans in the country.

In order to improvise the supervisory ability, every department directly or indirectly associated with generation of dioxins and furans have to work hand in hand. There is a need to come out with policies and rules specific to dioxins and furans.

Further, monitoring of dioxins and furans is highly expensive and implementation needs good supervision that is at present inadequate in India.

Reducing and eliminating the PCDD/PCDF by-products emissions furthest with the best actual techniques (BAT) and the best environmental plans (BEP) is the requirement of the convention to all the signatory

countries. Presently adopting the BAT and the BEOP is accepted conceptually, but the practices of the BAT and the BEP are almost blank.

The other Appendix is focused on the education and public awareness programmes, which will have to be developed in local languages. Such information must highlight the issues of health and health related impacts of dioxins/furans being unintentionally released into the environment.

The multi tier system of administration in India is also a limiting factor as each entity right from the village/gram panchayat/municipality/ municipal corporation /district/state will have to address the issue in their respective framework. The most recent initiative of some of the progressive, larger mills in India limits itself to the recovery of chemicals from black liquor for reusability.

Management of POPs issue must be connected with the relevant national legislature, laws and regulations. India is one among the first few countries in the world that has made provisions for the protection and improvement of Environment in its Constitution.

Appendix 5 discusses the primary assessment report on India's POP stakeholders. A pre requisite of the Stockholm Convention is the involvement of all stakeholders in the preparation of the NIP. As such major stakeholders identified were the national and state governments, municipal corporations, industrial enterprises, analytical and testing laboratories, research institutes; law-enforcement agencies, public health organizations, NGOs and other relevant agencies. Views of all these stakeholders were considered while preparing this project brief.

The stakeholders' information is presented in the NIP as Preliminary National Digital Stakeholder Directory. Primary review report on India's POPs Stakeholders

Appendix 6 contents an initial assessment on POPs monitoring and analysis laboratories in India. There is few organizations which have given a feedback that they can analyze all the POPs including Dioxins and Furans. These organizations have HRGC/LRMS but no HRMS is available with any organization. This is I think for so large country a necessity.

This Appendix clearly describes national capacities for POP laboratories and their ability to analyse POPs including of used quality assurance/quality control systems.

As far as monitoring Indian experts indicate that many studies have been completed throughout India on levels and health effects of pesticides and PCBs in animals and humans. There is no review or compilation of this research, which exists, mostly in departmental reports.

The ITRC monitors pesticide levels in the environment and reports that levels of banned POPs pesticides have dropped in India over the past 10 years. Recent research at the ITRC shows certain programmes on selected POP chemicals that include the association between environmental pollutants (lead, DDT, HCH) and intrauterine growth retardation; biodegradation of chlorinated pesticides (including DDT); molecular toxicology and epidemiology surveys; mechanisms of stress gene expression in *Drosophila melanogastor* by chlorinated pesticides.

Conclusions:

Based on my professional experiences, I consider the project proposal was sufficiently covered, the NIP was very well prepared and clearly and detailed described the POPs problems in India including the recommendations which must be done in the future.

I recommend this project to accept.

Moscow, 06/06/2006

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UNIDO response to the STAP Review

The STAP review indicated that the proposal was sufficiently covered and that the preparatory phase of the NIP was very well prepared, clearly detailed and described the POPs problem in India including recommendations for the way forward. It was further recommended that the project should be accepted (approved) for funding by the GEF.

Although the project proposal highlighted various problems and action plans with budgets for implementing the Stockholm Convention to enable the country to meet its obligations, detailed inventories are not available to enable accurate planning. Fairly accurate baseline inventories of POPs will be required to enable the country embark on post-NIP activities for reducing and eventually eliminating POPs releases. This is the gap that will be filled by the implementation of this full-sized project.

The Government of India is fully committed by this initiative, evidenced by the fact that she ratified the Stockholm Convention on 13 January 2006 and especially the level of co-financing amounting to US$6.88 million for this full-sized project.

c) GEF Secretariat and other Agencies' comments and IA/ExA response

GEF SECRETARIAT PROJECT REVIEW OF13 APRIL 2007

1. COUNTRY OWNERSHIP			
Country Eligibility: Eligible under para 9(b) of GEF Instrument. India has signed the Stockholm Convention, which is a requisite in order to access funds for enabling activities. Eligibility for follow up actions still to be defined. Most likely it will require ratification. Oct. 2006. India has ratified the SC.			
At PPG, if any	**Expected at Work Program inclusion**	**Expected at CEO endorsement**	**IA/ExA Response**
Country Drivenness: India will execute the project through the Ministry of Environment and Forests.	Substantial co-financing will be contributed to the full project by the Government. Oct. 2006 India is pledging more than $7m to the project.		Noted
Endorsement: India has endorsed the project.	The proposal is endorsed.		
2. PROGRAM AND POLICY CONFORMITY			
Program Designation and Conformity The proposal falls within the context of GEF's action on POPs as the Interim Financial Mechanism for the Stockholm Convention, and responds to the requirements of GEF policies and guidelines.	The proposal goes beyond "enabling activities" strictly speaking in a number of aspects.		As suggested, the activities that fall beyond "enabling activities" have been taken out of the ambit of the project. Some of these, however, would possibly fall under post NIP activities.
Project Design The project concept follows the general framework recommended by GEF for the preparation of National Implementation Plans. A number of the activities listed in the concept seem however go beyond the scope of 'Enabling Activities' sensu strictu	In light of (1) the total budget foreseen, which greatly exceed the amounts normally granted for enabling activities**,** even for large countries (see precedents of other Conventions); and (2) the list of activities that would be covered by the project, it is recommended to adopt a phase approach, which would include as a first phase the Enabling Activities s.s… Follow up		A list of activities proposed to be covered in the project would be properly phased. This would enable to prioritized actions on specific issues through development of separate follow up projects, namely Treatment & Disposal of medical wastes, Development of alternatives to DDT Identification of major sources of dioxins and furans emissions, etc.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	actions/phases would emerge from priorities identified, and would be presented as separate projects (capacity building, structural strengthening, detailed inventories, laboratory accreditation and strengthening, etc.)		In view of the limitation of time all efforts would be made to complete the NIP without resorting to case studies etc. which would be left for consideration as post-NIP activities.
	Oct. 2006: Moreover, the problem of doing pilots, case studies, etc. is that these will not be finished on time to inform the NIP, but on the contrary will slow down the process. Bearing in mind that India has 2 years after entry into force to submit its NIP, I would suggest that rather than trying to address all POPs issues in India in one project, India should focus its efforts with a streamlined proposal aiming at delivering a NIP within two years.		Recommendation accepted and all efforts would be made to ensure delivery of the NIP within 2 years through appropriate streamlining of the activities.
	In many instances, there are references to "incremental costs" of certain activities. This is ambiguous and counter productive. Are those supposed to be "incremental costs" in the GEF sense? These cannot be defined in a priori through a project since these are by definition a negotiated agreement between the GEF and the country. Please refer to the "cost" of actions, implementing measures, etc. as this is unambiguous and therefore more useful. It is often not clear who does what. E.g. Activity 1.3.1 "Examine the recommendations for consistency … with governmental policies."		The activities under the project document have been identified based on extensive studies and consultation in the field. The requirement of additional funds to deal with these activities was reflected as incremental cost, which in fact would be the cost of action and implementation measures and necessary amendments have been reflected in the PES and Project Brief documents.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	In the Executive Summary, the activities described under DDT do not seem to match the title, or they are worded strangely (e.g. "prepare forecast of production of these POPs"? These? In fact, this objective 2 seems to merge activities related to DDT and those related with the other pesticides. Project Management: Why a "national steering committee" (NSC), and a "project steering committee? (The latter mentioned in the full brief, but not in the exec. Sum). Who is the "National Steering Committee"? I do not understand how a NSC could be responsible for managing the project, recruitment of consultants, etc. (P25). The National project director is to be located in a "core cell" in MOEF. Is that core cell different from the Stockholm Convention Compliance Office? If so why? Who is the "National executing agency", referred to in a couple of places? The ITRC? I do not understand the sentence "MOEF will coordinate with the Stockholm Compliance Office to be set up in MOEF. This will require additional funds". This is found both in the Exec. Sum and the brief.		The word "these POPs" have been replaced with DDT. There would only be National Steering Committee (NSC). The NSC is responsible to plan, guide and monitor all actions needed for compliance of the provision of the Stockholm Convention. It would delegate appropriate authorities namely National Project Director who would be heading the Project Management Committee and would be responsible for recruitment and supervision of local experts, prepare sub-contracts, coordinate with UNIDO, etc. The Ministry of Environment & Forests will be the National executing agency and would appoint appropriate institutions, which amongst others may include institutes like ITRC. A Coordination cell to oversee the implementation of the project activities would be set up which, amongst others,

At Pipeline Entry	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	Finally, one of the description of activities reads (5.1.2) "Multilateral funds in line with the ODS phase out convention should be made available…" This is not a description of activities, please delete.		would ensure compliance of the various provision contained in the Stockholm Convention in all its aspects and oversee the national execution. Observation noted and deleted.
Sustainability (including financial sustainability	Ways to promote sustainability will be pursued during project preparation, for example Government co-financing for national project coordinator / POPs focal point unit. Oct. 2006 The relatively high Government contribution to this project, including the support of the focal point, should facilitate the long-term sustainability of the activities started here, and of the structures put in place to implement the Convention.		Noted Noted
Replicability N/A	N/A		
Stakeholder Involvement: The concept provides mechanism and assurances for full stakeholder participation, particularly of various sectoral Ministries and Industry	Ways to promote civil society participation in NIP development and implementation will be sought during project preparation. Oct. 2006 There is a stakeholder analysis, and some general statements about the fact that stakeholders will be invited to participate in activities. Concrete examples would be better, including for example how private sector and NGOs were involved in the PDF phase.		Noted Noted

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
Monitoring and Evaluation	An M&E plan will be developed, including provisions for independent mid-term review of the full NIP project. Oct. 2006 Please pull out of the logframe some 5/6 key results to be achieved by the project, together with indicators. You need to refer to the terminal evaluation in the Exec. Sum P21. The M& E table refers to a UNIDO project manager. Is the equivalent of a Bank TTL or UNEP task manager, i.e. someone whose costs are covered by the agency fee and who provides oversight and some technical backstopping for the project?		Key results to be achieved along with indicators (in italics) for some of the activities are presented below. Develop measures to restrict and/or eliminate production, use and trade of DDT. - *Inventories and information system components, reduction and phase-out strategies and capacity building completed by project end.* Prepare a preliminary national inventory of PCBs and equipment containing PCBs - *Preliminary national inventory of PCB wastes and equipment in use completed.* Develop measures to identify sites contaminated by POPs. - *Contaminated sites identified.* Develop measures in relation to stockpiles of/ or containing, intentionally produced POPs. - *Preliminary inventory of stockpiles completed* The UNIDO project manager would be someone similar to UNEP task manger.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
3. FINANCING			
Financing Plan Given the size of the country and the magnitude of the problems related to toxic chemical management in India, the preparation of the NIP will require funds beyond the limit of $500K established by the Council for Enabling Activities under expedited approval procedures. Hence, the proposal is for a full project, with a tentative total budget of $4-5 million. This amount however seems to include the costs of actions that go beyond the normal reach of enabling activities.	A substantial co-financing is expected from the Government and/or other donors. A structuring of the project into phases is recommended in this review, including an initial phase covering "enabling activities s.s." the cost of which should not exceed $1.5 million to the GEF. Oct. 2006 The proposal goes beyond what is expected of a NIP development project in many aspects. In light with the recommendation to "streamline" the proposal, a number of non-essential elements could be cut from the budget, for example $242K for "increase awareness of POPs issues" (1.4.2), a least $100K of 4.1 (UPOPs) as well as most 4.2 and the whole of 6 "strategy for Capacity building development", 360K. There is little attempt to convince the reader of the reality of the proposed co-financing. Some numbers would need justification, for example I note that $1.6m of co-financing is attributed to "establish project focal point in MOEF".		Necessary changes as suggested have been carried out in all the documents.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	It is strange that there should be no co-financing for establishing an MIS in the Ministry, taking into account the technological sophistication of India. $200K is promised from UNIDO. Please elaborate.		Activity 1.1.2 Establish National Information Management System - This has a co-financing of US$200,000 from GoI. $200 K is an in-kind contribution of UNIDO for technical backstopping of the project.
Implementing Agency Fees	What is the status and source of funding of the CTA? What is meant by "UNIDO may establish a focal point"?		CTA has been canceled; instead a National Project Management Expert will be recruited by UNIDO. In view of the complex nature of the full project and its many and diverse components, UNIDO will provide an additional staff member from UNIDO hqs. as a program liaison officer for all environment related activities including NIP and post-NIP projects in its existing Regional Coordination Office in Delhi. The RCO in Delhi with its network in the countries of the Asia-Pacific region will ensure exchange of experiences and expertise between India and other countries of the region and beyond, as well as ensure national awareness of regional initiatives on POPs. It will also benefit from the part-time services of professional and support staff colleagues, in particular of senior staff engaged in the management and coordination of UNIDO's programme of support to the Stockholm Convention, which UNIDO will make available as its in-kind contribution to the project.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
4. INSTITUTIONAL COORDINATION AND SUPPORT			
Core Commitments and Linkages	India is one of UNIDO's largest programs. UNIDO is committing in-kind contribution of $200K in additional technical backstopping for the project.		Noted
Consultation, Coordination, Collaboration between IAs/EAs, if appropriate The proposal does not provide a comprehensive context, nor assurances that coordination with on-going or planned activities of other IA/EAs or other agencies ill be an integral part of the project, and that complementarities will be captured.	The full proposal will include a comprehensive and exhaustive presentation of ongoing related activities, and indicate specific mechanisms to ensure coordination and synergies. Oct. 2006 I can find no evidence of consultation or coordination with other IAs/EAs, nor list of on-going initiatives.		Noted The project proposal submitted by the GOI is a result of close coordination between UNIDO and the GOI. Other IAs were also involved in the process.
5. RESPONSE TO REVIEWS			
Council			
Convention Secretariat			
GEF Secretariat			
Other IAs and RDBs UNDP has commented on the proposal. Some of the comments have been taken into consideration.			
STAP			
Review by expert from STAP Roster			

GENERAL COMMENTS			
(for record purposes only, not pre-conditions)			
At PPG, if any	**Expected at Work Program inclusion**	**Expected at CEO endorsement**	**IA/ExA Response**
The concept reflects in principle an effective response to the initial requirements of the Stockholm Convention and outlines the actions needed to prepare a National Implementation Plan. Many of the activities and their scope, however, appear to go beyond the limited reach of Enabling Activities as defined by GEF Council, and by the POPs Treaty (NIPs).	Because of the large size and population of India, the amount of effort necessary to develop a NIP in India is expected to be much greater than in most countries. However, the activities eligible for GEF funding are not expected to go beyond those described in the GEF initial guidelines for POPs enabling activities approved by the GEF Council. Oct. 2006 This review raises a number of points that need addressing before the project can be submitted to Council. In particular, in many instances, the activities proposed go beyond what is normally expected of a NIP development process. Taking into account the limited time available to India to develop and submit its NIP, it would be advisable to streamline the proposal.		Noted Based on the review, the proposal have been streamlined and revised.
SUMMARY RECOMMENDATIONS BY PROGRAM MANAGER			
	Consideration will be given to all recommendations contained in this review. It is recommended to adopt a phased approach, with a first step consisting of "Enabling Activities sensu strictu". The total GEF contribution at the time of the work program inclusion should not exceed the amount indicated in this review. Oct. 2006 The points raised in this review should be discussed in a review meeting with UNIDO.		Noted Noted and the changes in budget have been made. Noted

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	April 2007 Additional comments for June WP based on revised March 2007 document. Most comments raised in this review have been addressed, but a number remain: I do not understand the 'note on the co-financing letter from the GoI'.		The note on co-financing letter explains the commitments of GoI for the project on NIP development ($6.88 million) and the post-NIP program development ($750K), a total of $7.63 million.
	I don not understand the meaning of the insertion of the sentence 'Incineration with proper design parameters should be available' in the context of the description of Activity 5.1.2.		The activity pertains to identify effective destruction methods in conformity with the requirements of the Stockholm Convention dealing with the typical obsolete POPs pesticides/PCBs disposal and in this context technical specifications for cement kilns, non-combustion technologies, etc. would need to be established.
	It would be helpful if the document could clarify how UNIDO intends to support the project with $200K in addition to the project fee. UNIDO's response to my earlier query regarding establishing a focal point is still ambiguous. As the project is described, I am incapable of understanding whether or not it is proposed that GEF project resources should be allocated to UNIDO for staff related costs.		The comment has been noted and consequently, UNIDO has revised its response as well as the relevant parts of the PES and PB. UNIDO contribution of $200K is in addition to the project fee, which will be used to fund an additional program and liaison officer at the existing Regional Coordination Office (RCO) in Delhi to support and ensure effective project implementation and M&E. However, the so-called focal point at MOEF will actually comprise of a small team of dedicated staff for technical backstopping and day-to-day project management who would keep daily contacts with 5 institutions

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			specialized in the field of pesticides, PCBs, dioxins and furans, monitoring and analysis and policy and regulations to undertake the various activities of the project. To develop and formulate NIP in India within a short period of time such a small organizational entity at MOEF for overall coordination has of utmost importance and the budgetary allocations are reasonable. To bring clarity to the document the wording has been changed. Instead of *focal point* the wording of *technical coordination group* has been introduced. The title of budget lines has been changed accordingly.
	That 'the proposal submitted by the GoI is a result of close coordination between UNIDO and GoI' is an evidence, and is no response to the observation that the proposal makes no mention of coordination with other GEF agencies, and other initiatives more generally.		The Government of India has been maintaining close coordination with the GEF agencies as well as other UN agencies on multi-million dollar programme of technical cooperation undertaken with the World Bank, WHO, Integrated Pest Management with FAO, on-going work on cleaner production and solid waste management and Regional Network on Pesticides for Asia and the Pacific (RENPAP) with UNIDO. Prior to the initiation of the PDF-B project, the Government of India carried out an extensive consultation with the all GEF IAs through the organization of the Expert Group Meeting sponsored by the World Bank focusing on the status of POPs in India in which UNDP and UNEP also participated. While preparing the PDF-B project, all stakeholders including all GEF IAs and ExAs were involved in 10 workshops organized by the ITRC in selected parts of India.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	I requested clarification on the 'establishment of a focal point in MOEF', since this item represents $1.6m of co-financing.		India is one of the largest countries in the Asia-Pacific region with 28 States and 5 Union Territories with a population of over 1 billion. The chemical industry has been one of the fastest growing industries in the Indian economy. Due to large geographical area and strong base of the chemical and heavy industry distributed across the country generating large quantities of unintentional POPs, the activities related to NIP development is multifarious. Taking into account the magnitude of the problem and the time constraints to prepare the NIP, the MOEF will engage 5 institutions specialized in the field of pesticides, PCBs, dioxins and furans, analytical and legal to undertake the various activities of the project. In order to effectively coordinate with all these agencies/institutions, the MOEF has decided to establish a technical coordination group in the Ministry to provide an overall coordination for the smooth implementation of the project. To bring clarity to the document the wording has been changed. Instead of *focal point* the wording of *technical coordination group* has been introduced. The title of budget lines has been changed accordingly. In light of the above clarification the co-financing amounting to $ 1.6 seems to be reasonable.
	There are a number of items that it is proposed should not be co-financed, and this again seems counter-intuitive because of the type of activity that should inevitably involve participation and co-financing from various stakeholders in India.		Since a large amount of co-financing from the GoI is committed from various sources including different stakeholders, the activities as mentioned in the review sheet viz. Establishment of IMS, draft NIP, review and endorse NIP, provide recommendations and gain endorsement, establish

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	Establish information management system. Draft the NIP Review and endorse the NIP (?!) Provide recommendations and gain endorsement Establish national information center Establish stockpile inventory (will this be done solely by international consultants?) Evaluate analytical capacity Evaluate and develop laws, policy (?!) Formulate strategies for U-POPs		national information center, establish stockpile inventory, evaluate analytical capacity, evaluate and develop laws, policy, formulate strategies for U-POPs, requires a complimentary support of the GEF as most of the funds required to undertake these activities would be reflected as in-kind contribution (which are not added in the budget of GoI and reflected in the budget sheet) such as salary/wages of the technical and scientific staff engaged in the work, laboratory facilities, infrastructural support costs, etc.
	The description of activity 3.3.1 envisages a study tour. This would normally not be covered by GEF funds.		Study tour as envisaged under 3.3.1 is a very important activity as this would give a first hand exposure to the group of national experts who would be engaged in the PCB management. The 3 activities namely (1) facilitate national expert group meeting to reach consensus on key technical and logistical issues and to promote awareness of PCB issues in India, (2) undertake a pilot programme in each state by conducting workshops to raise awareness of PCBs health and safety issues, inventory, management and destruction methods and techniques for key stakeholders and (3) lead a study tour to PCBs management, storage and destruction facilities to a country with a well-developed PCBs management programme are included under 3.3.1 with a total budget of US$ 25,100. Thus, the actual expenditure of this study tour is very minimal (less than $9000) and is considered appropriate.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	Activity 6.1.2 appears to relate mostly to activities of UNIDO as a GEF agency, and to be covered by the project fee. As such, it should probably not be here. Moreover, this doe not fit with the project budget, which refers to establishment of project focal point in MOEF.		In order to support a complex and multi-location activities based project, there is an essential need to have 2 project technical (professional) officers (1 National Program Officer and 1 National Technical Coordinator) in Delhi to provide technical backstopping and project management on day-to-day basis. In this context, the post of this additional program and liaison officer will be established in the existing UNIDO Regional Coordination Office in Delhi.
	Activity 6.2.2: need to refer to independent terminal evaluation.		Necessary corrections have been made in the said activity to include independent terminal evaluation.
	Project management costs attributed to the GEF should be no more than 10% of the GEF grant.		Project Management costs have been brought down to less than 10% ($160,000) of the GEF grant.
	The project management table seems 'wrong'. All locally recruited personnel costs are attributed to the GEF, whilst most internationally recruited consultants are attributed to other sources. Maybe it is the other way around?		The costs mentioned as other sources for internationally recruited consultant (the newly recruited technical/professional officer) is the contribution of UNIDO. Other local personnel involved in the project management were not reflected in the project management table as it is in kind contribution of the Government. This has been also put in a footnote to the same table.
	Why is the GEF asked to pay for office facility etc to the tune of $91K		The budget allocated for office facility has been deleted.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
	'Miscellaneous' is not a description of expenses.		Miscellaneous cost has been deleted from the management budget.
	Why is the GEF requested to fund $50K of travel, for whom, to go where?		Travel cost has been reduced to $25K. This is mostly to cover local travel of nationals to different sites/locations in different parts of the country including coordination with 5 institutions engaged in the project activities, industries and other places where project related activities are envisaged to be conducted/undertaken.
	More than $1.8m of GEF allocation, or 57%, is for project management + personnel costs – this appears excessive.		While formulating the proposed project, all due considerations were given to identify the specific activities and determination of work-weeks needed to accomplish the project activities as detailed in the main project document. Keeping view of the vast size of the country, its large population, very diverse industrial and other activities generating wastes and unintentional POPs, as well as coordination with 5 institutions located in different parts of the country, the requirement of funds for project management and personnel costs were calculated on the basis of the actual requirements to undertake the complex nature of variety of project activities as envisaged in the project document to achieve the targeted outputs in a timely manner.

At PPG, if any	Expected at Work Program inclusion	Expected at CEO endorsement	IA/ExA Response
FURTHER PROCESSING			
A PDF-B request together with an outline for the proposed full enabling activities project was submitted as concept paper May 21 2002. Following discussions between UNIDO and GEF Secretariat, a final revised version was submitted September 18 2002. The program manager would recommend the concept for pipeline entry. The program manager would recommend the PDF-B for CEO approval. Nov 2006: the project should be kept in the pipeline and submitted as a priority at the first GEF-4 work program.	Submission of satisfactorily revised document.		