

GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS¹

Country/Region: Nigeria
 Project Title: Nigeria: Less Burnt for a Clean Earth: Minimization of Dioxin Emission from Open Burning Sources
 GEFSEC Project ID: **3804**
 GEF Agency Project ID: 4221 (UNDP) GEF Agency: UNDP
 GEF Focal Area (s): POPs
 GEF-4 Strategic Program (s): POPS-2;POPS-3;POPS-1;
 Anticipated Project Financing (\$): PPG:\$130,000 GEF Project Allocation:\$4,150,000 Co-financing:\$19,680,737 Total Project Cost:\$23,960,737
 PIF Approval Date: February 25, 2009 Anticipated Work Program Inclusion: June 24, 2009
 Program Manager: Ibrahima Sow GEF Agency Contact Person: Suely Carvalho

Review Criteria	Questions	Secretariat Comment at PIF/Work Program Inclusion ²	Secretariat Comment At CEO Endorsement(FSP)/Approval (MSP)
Eligibility	1. Is the participating country eligible?	Nigeria has ratified the SC	Same as in PIF.
	2. If there is a non-grant instrument in the project, check if project document includes a calendar of reflows and provide comments, if any.		
	3. Has the operational focal point endorsed the project?	Yes	Yes.
	4. Which GEF Strategic Objective/ Program does the project fit into?	SP1/SP2/SP3	Same as in PIF.
	5. Does the Agency have a comparative advantage for the project?	Yes, the project mostly addresses technical assistance and relies on on-going work of UNDP on waste management in Nigeria.	Same as in PIF.
Resource Availability	6. Is the proposed GEF Grant (including the Agency fee) within the resources available for (if appropriate):		
	• The RAF allocation?	NA	NA
	• The focal areas?	Yes	Yes.
	• Strategic objectives?	NA	NA
	• Strategic program?	NA	NA

¹ Some questions here are to be answered only at PIF or CEO endorsement. Please do not answer if the field is blocked with gray.

² Work Program Inclusion (WPI) applies to FSPs only. Submission of PIF of FSPs will simultaneously be considered for WPI. For MSPs, once the PIF is approved by CEO, next step will be to continue project preparation until the project is ready for CEO approval.

Project Design

<p>7. Will the project deliver tangible global environmental benefits?</p>	<p>The PIF notes that total releases of UPOPs in Nigeria ‘ mostly burning of waste and from land clearing ‘ amount to 7kg/yr. This is nearly as much as what China reports for all its PCDD/Fs inventory (10.3 kg/yr in total). Has this analysis been peer reviewed?</p> <p>24Feb2009. Addressed in UNDP response The project will improve the assessment of the baseline. Nevertheless, GEFSEC expects at time of CEO endorsement a stronger articulation of baseline and generation of global environmental benefits - through project direct activities and through replication.</p>	
<p>8. Is the global environmental benefit measurable?</p>		<p>The comment above has been adequately addressed in the project document. A comprehensive baseline description of municipal and agricultural wastes management and, in particular of open burning practices in the selected pilot states is provided.</p> <p>The project aims at achieving at least 20% reduction in the UPOPs releases from open burning of collected wastes in the two pilot cities and 15 % of UPOPs releases from burning of crop residues in Kano state. The total UPOPs reduction amounts to 188.47 g per year.</p> <p>With an effective replication scheme in 5 other states, it is expected that this effort will reach 1,060 g per year.</p>
<p>9. Is the project design sound, its framework consistent & sufficiently clear (in particular for the outputs)?</p>	<p>The PIF notes that, "with replicating effect", all Integrated Waste Management Strategies could reduce nationwide municipal waste burning by 20%, thereby resulting in reduction of 900g TEQ/yr PCDD/Fs.</p> <p>- What is understood by "replicating effect"? Is it the adoption of these policies nationwide? If so why only 20% reduction. In</p>	<p>The concept of replication work in 5 other states has been further elaborated in the project document. This work will be integrated into the National Municipal Solid Waste Management Program (IMSWM) whose implementation is co-funded by GoN, State Governments and the Private Sector. The project will bring to the</p>

		<p>any event, what measure are planned to ensure such replication takes place?</p> <p>Land burning. Addresses 153g TEQ (not a lot?). Direct project activity would reduce by 20g; "successful replication" by 100g. So cost-effectiveness of that component is around \$50,000/gTEQ. As above, we would need to see evidence that successful replication will be promoted and that conditions are such that it will take place.</p> <p>24Feb2009. This is addressed in UNDP's response. Further clarity and elaboration expected by CEO endorsement.</p>	<p>IMSWM a new dimension specifically related to UPOPs reduction through implementation of BAT/BEP guidelines in the wastes and agricultural management sectors.</p>
	<p>10. Is the project consistent with the recipient country's national priorities and policies?</p>	<p>Nigeria's NIP is due for submission Aug 2006. Through UNDP, the GEF would appreciate receiving a copy of the draft NIP so as to be in a position to judge whether this proposal is in line with NIP priorities as requested by Convention guidance. Furthermore, we would urge Nigeria to submit its NIP to the convention at its earliest convenience.</p> <p>24Feb2009 - draft NIP received through UNDP with thanks.</p>	<p>According to the Nigerian NIP, UPOPs generated by uncontrolled burning of municipal wastes and agricultural land are among the key environmental challenges in Nigeria</p>
	<p>11. Is the project consistent and properly coordinated with other related initiatives in the country or in the region?</p>	<p>The project relies on UNDP work in the country. It is the first of this kind for the GEF.</p>	<p>Coordination with the GEF/UNIDO project in Ghana and Nigeria on contaminated sites and the GEF/WB/FAO project on ASP mentioned in the project document is quite relevant.</p>
	<p>12. Is the proposed project likely to be cost-effective?</p>	<p>Based on the corresponding background section, I understand the reference to 20g TEQ avoided from land burning. In that context however, I don't understand the 90g avoided from waste management practices. I suspect it is because conceptually the incremental reasoning is unclear.</p> <p>24Feb2009. This is addressed in UNDP's</p>	

		response. Further clarity and elaboration of cost-effectiveness expected by CEO endorsement, taking into account project direct benefits and replication potential.	
	13.Has the cost-effectiveness sufficiently been demonstrated in project design?		Open burning of municipal and agricultural wastes with UPOPs releases is a recurring practice in many developing countries, - I assume that lessons learned from this project will be largely replicated in the region with very little or no additional costs.
	14.Is the project structure sufficiently close to what was presented at PIF?		Yes. It is noted that the work done under the PPG has allowed the consolidation of components 1 and 2, - Legislative strengthening and policy and Reduction of UPOPs emissions through introduction of new practices and approaches in wastes management -reducing the number of components from four to three.
	15.Does the project take into account potential major risks, including the consequences of climate change and includes sufficient risk mitigation measures?	Potential risks and mitigation strategies are outlined. CC risks appear negligible.	Same as in PIF.
Justification for GEF Grant	16.Is the value-added of GEF involvement in the project clearly demonstrated through incremental reasoning?	<p>I can understand that component 1 on UPOPs inventory is mostly incrementalâ€</p> <p>â€ however, component 2 appears to be of a baseline nature ("national waste management policy developed"; "state and municipal guidance covering waste management"), with perhaps a modest contribution to ensure these policies, guidelines etc also cover aspects specific to UPOPs release reduction. One would therefore expect this component to attract more co-financing than GEF resources.</p> <p>In that logic, 3.1 looks acceptableâ€</p> <p>â€ but again I do not understand why 3.2</p>	Nigeria has adopted and will invest in an integrated wastes management strategy through introducing new practices and approaches in wastes management. The GEF incremental support will bring a new dimension specifically related to UPOPs reduction through implementation of BAT/BEP guidelines in the wastes and agricultural management sectors. These include wastes sorting and recycling, composting, demonstration and promotion of improved fallow systems.

		<p>would attract so little co-financing: "introduction of waste separation"; "establishment of composting etc". These are activities that appear to be of a baseline nature.</p> <p>Component 4. Can the case really be made that the main reason/benefit of reduction of bush burning is for UPOPs release reduction? (the proposal is GEF \$800K, co-financing \$150Kâ€)</p> <p>Without the [GEF] support it is expected that economic considerations rather than environmental (UPOPs) concerns will determine course of action". With what consequence? What is it specifically that one would do to reduce UPOPs release from poor waste management practices, beyond what would be expected as (baseline) policies and practices for good waste management?</p> <p>And the same question of course with regards section E on incremental reasoning: "Without the project, any reduction in UPOPS emissions would be unintentional and a result of happy coincidence". Right. What is it that would be different in a course of action explicitly considering UPOPs?</p> <p>24Feb2009. Addressed in UNDP's response. Further elaboration expected by CEO endorsement.</p>	
	<p>17. Is the type of financing provided by GEF, as well as its level of concessionality, appropriate?</p>		
	<p>18. How would the proposed project outcomes and global environmental benefits be affected if GEF does not invest?</p>		<p>Without GEF intervention, it is likely that high levels of UPOPs generated by open burning of municipal and agricultural wastes will continue to affect the</p>

			environment and the health of people in Nigeria and the global environment.
	19. Is the GEF funding level of project management budget appropriate?	Project management needs to be co-financed at a higher level. At present it is 10% of GEF grant, 2% of cofinancing. 24Feb2009. Satisfactorily addressed in revised document.	Project management budget stands now at 7% of the GEF grant.
	20. Is the GEF funding level of other cost items (consultants, travel, etc.) appropriate?		Yes. GEF funding levels of other costs appear appropriate.
	21. Is the indicative co-financing adequate for the project?	2:1 - acceptable. Cofinancing is mostly baseline government intervention relative to integrated waste management.	
	22. Are the confirmed co-financing amounts adequate for each project component?		Yes. However, the contribution from the Federal Ministry of Environment of Nigeria and from UNDP respectively estimated at US \$ 9,970,000 and \$US 100,000 should be supported by co-financing letters.
	23. Has the Tracking Tool ³ been included with information for all relevant indicators?		
	24. Does the proposal include a budgeted M&E Plan that monitors and measures results with indicators and targets?		Yes.
Secretariat's Response to various comments from:	STAP	None received	None received.
	Convention Secretariat	None received	
	Agencies' response to GEFSEC comments		
	Agencies' response to Council comments		Comment received from Germany and responded adequately.
Secretariat Decisions			
Recommendations at	25. Is PIF clearance being recommended?	This can be a great project in line with country priorities if the case can convincingly be made on the incrementality and potential to generate	

³ At present, Tracking Tools apply to Biodiversity projects only. Tracking Tools for other focal areas are currently being developed.

PIF		global environmental benefits. The central question is : what is it that is proposed, in addition to good waste management practices, specifically to reduce UPOPs releases? 24Feb2009. This is addressed in a largely satisfactory manner in revised document and UNDP's response. Further elaboration expected by CEO endorsement. CEO PIF clearance is recommended.	
	26.Items worth noting at CEO Endorsement.		
Recommendation at CEO Endorsement	27. Is CEO Endorsement being recommended?		Upon submission of co-financing letters from the Federal Ministry of Environment of Nigeria and UNDP.
Review Date	1 st review		
	2 nd review		
	3 rd review		

REQUEST FOR PPG APPROVAL

Review Criteria	Decision Points	Program Manager Comments
PPG Budget	1. Are the proposed activities for project preparation appropriate?	<p>None submitted yet. PPG of \$200K is expected.</p> <p>May 28, 2009 PPG submitted May 20, 2009.</p> <p>The PPG will be used to review existing NIP data on UPOPs emitted from the open burning of municipal wastes and from agricultural land clearing activities and to collect missing baseline information needed for the development of the FSP.</p> <p>The PPG will also help collect relevant technical information from similar types of projects/proposals and determine most economic applicable, BAT/BEP measures.</p> <p>It will facilitate, through a stakeholder consultation process, the determination and establishment of implementation and project monitoring and evaluation arrangements.</p> <p>The results of the above investigations will be presented to a multi-stakeholder workshop for review and approval.</p>

	2. Is itemized budget justified?	PPG needs to be co-financed at a higher level. 24Feb2009. May 28, 2009 PPG financed at a ratio 1:1
	3. Is the proposed GEF PPG Grant (including the Agency fee) within the resources available under the RAF/Focal Area allocation?	
	4. Is the consultant cost reasonable?	Yes.
Recommendation	5. Is PPG being recommended?	May 28, 2009. PPG is recommended for approval.
Other comments		
Review Date	1 st review	
	2 nd review	
	3 rd review	

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