

ANNEX C - STAP ROSTER TECHNICAL REVIEW

STAP EXPERT REVIEW OF GEF PROJECT BRIEF ENTITLED

“DEVELOPMENT OF NATIONAL IMPLEMENTATION PLANS FOR THE MANAGEMENT OF PERSISTENT ORGANIC POLLUTANTS (POPs)”

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General Observations

This is a proposal for the pilot preparation of National Implementation Plans for the management of Persistent Organic Pollutants by 12 countries. The substances concerned are those addressed in the draft International Convention on Persistent Organic Pollutants (POPs) to be considered for signature at a Diplomatic Conference in May 2001 in Stockholm. These comprise a group of 12 substances that are either manufactured or by-products of industrial processes.

Overall, the project proposal is straightforward and represents an appropriate initial response to the requirements for dealing with POPs issues by countries that become Contracting Parties to the new POPs Convention. It is predicated on the reasonable assumption that developing countries will need guidance in the development of National Implementation Plans to deal with POPs in a manner consistent with the provisions of the Convention. As such, it defines procedures that will be used by a selected short list of developing countries to formulate National Action Plans. This will provide valuable experience for other states that will face similar responsibilities in becoming Contracting Parties to the POPs Convention.

The project contains a number of positive features that deserve highlighting. First, the project expressly allows for countries in the vicinity of the recipient countries to be included in local and/or regional consultations. Second, considerable attention has been paid to defining the nature of the national consultation processes and the types of stakeholder that are to be included in these consultations, including public and non-governmental organization involvement. Third, the entire process is designed to build on and refine a set of international guidelines for the preparation of National Action Plans by states intending to become Contracting Parties to the POPs Convention.

In summary, this project proposal constitutes a well-conceived, thoughtfully prepared and logical response to encouraging countries both to accede to the new Convention and to satisfy their associated responsibilities in a coordinated and systematic manner.

Specific Comments

Inevitably, there are aspects of the proposal that deserve more specific comment. In this context the guidance to STAP Reviewers has been used as a means of categorizing comments.

Scientific and Technical Soundness

This project brief has been prepared on the basis of a PDF-B. It has also benefited from activities in other GEF project preparative phases, such as the Regionally-based Assessment of Persistent Toxic Substances PDF-B, and the negotiations that have taken place through the International Negotiating Committee leading to the preparation of the draft POPs Convention. Accordingly, there exists considerable supporting background to the proposal to ensure that it is sound from technical and scientific standpoints and, more particularly, aligns with the provisions of the draft international convention. Nevertheless, allowance has been made, by specific reference, for the development of National Implementation Plans for POPs to be addressed within the larger context of Persistent Toxic Substances. This improves the scientific validity of the proposal through the strengthening of its toxicological context.

While Annex F provides the basis on which the selection of countries was made, it unfortunately does not document the specific nature of the selection process that resulted in the identification of the 12 participating countries. In this context, it might be noted that there is greater emphasis on pesticides and other manufactured chemicals in the proposal than on the inadvertent by-products, chlorinated dibenzo-*p*-dioxins and chlorinated dibenzofurans that are also covered by the draft POPs Convention. This is probably understandable in the context of the developing nature of the proposed participating countries; nevertheless confidence in the scientific basis of the proposal would have been more convincing if the actual process of country selection had been included to demonstrate how the desire to address all classes of substances addressed by the POPs Convention had been considered.

Global Environmental Benefits

The global benefits of the proposed project are abundantly clear. It should contribute much to the refinement of international guidelines to accelerate the pace at which prospective Contracting Parties to the POPs Convention are able to meet obligations imposed on Contracting Parties. Furthermore, it will provide a measure of the effort and costs of formulating National Implementation Plans so that countries are more prepared for the demands associated with accession to the Convention. The proposed project activities imply no consequences that might adversely affect the environment.

Alignment with the Goals and Operational Strategy of the GEF

The proposed project aligns well with the existing strategic guidance adopted by the GEF, both the Operational Strategy and the Operational Program descriptions. Without any further amendment the project aligns well with Operational Program 10 in that it deals with priority contaminants. It addresses an international concern about the adverse effects of chemicals and contains a strong element of “demonstration” of potential benefit to other developing countries. Thus, even without the recent commitment of the GEF to the “development of action plans for complying with the obligations of the POPs Convention and for setting priorities for initiating future activities on POPs” to provide support to the implementation of the POPs Convention, the project ideally aligns with existing GEF goals and strategies. The recent commitment by the GEF

to create an Operational Program envelope to provide for projects to implement the provisions of the new convention merely strengthens this alignment.

Program Priorities, GEF Council Guidance and the Provisions of Relevant Conventions

The previous paragraph covers most of the issues to be addressed here. The fact that the proposed project deals specifically with procedures for fulfilling responsibilities under the POPs Convention merely makes its relevance to a priority international issue that much more evident. Furthermore, this project proposal stems from a previous preparative activity addressing a larger range of substances that remain of general concern in a number of international agreements. This increases its relevance to the international community.

Regional Context

The proposed project has no single regional alignment. It is a global project based on the pilot demonstration development of National Implementation Plans for ameliorating the damage and threats posed by persistent toxic substances. The only relevant question under this heading might be “Are the countries that have been selected for participation appropriate in both global and regional contexts?” This question can only be authoritatively addressed on the basis of the debate that resulted in the 12 countries being selected. As this information is not provided, as noted previously, a judgement of appropriateness could only be made superficially on the basis of the regional distribution of the beneficiaries. In this respect, the regional distribution appears appropriate in the context of my limited knowledge of national circumstances and the diversity and similarity of practices within the regions from which the countries were selected.

Replicability of the Project

The very nature of the project implies replicability to the benefit of other developing countries throughout the world. The wise inclusion of provisions for liaison with neighbours of the countries selected for participation further enhances the potential benefits to be derived from the project.

Sustainability of the Project

This is not a pertinent issue in respect of this project. The project proposal has been specifically designed as a means of accelerating the ability of countries to accede to the draft POPs Convention. Accordingly, the sustainability of the activity is inextricably bound up with the future of the Convention and, ultimately, will become a part of the GEF projects supporting the implementation of the Convention. Once the GEF Operational Program is established and the Convention comes into force, project directions and sustainability issues will become part of the guidance provided by meetings of Contracting Parties.

Linkages to Other Focal Areas

The other GEF Focal Area to which the project relates is Biodiversity because of the concerns about the effects of persistent chemical accumulations in organisms, especially higher trophic

chain organisms. At this stage, however, this relationship only needs to be acknowledged. The relevance to Biodiversity, however, does not warrant changes to the project as outlined in the project brief.

Linkages to Other Programs and Action Plans at Regional and Sub-Regional Levels

Although the primary focus of the proposed project is the implementation of the POPs Convention, it has direct linkages to regional, sub-regional and national activities in relation to the Global Program of Action for the Protection of the Marine Environment from Land-Based Sources of 1995. It also has direct association with other GEF initiatives under Operational Program 10 that are referred to in the project brief such as the PDF-Bs on “*Regionally-based Assessment of Persistent Toxic Substances*”, “*Reducing pesticide runoff to the Caribbean Sea*” and the “*Comprehensive Action Programme to Phase-out DDT in Mexico and Central America*”. In addition, many of the UNEP Regional Seas Action Plans and other regional Marine Protection Agreements among developed countries have major activities directed at assessments and control of POPs. The proponents are clearly aware of these other activities as well as the Inter-Organization Programme for the Sound Management of Chemicals. Equally, the proponents are aware of other international agreements that bear on the topic of chemical safety such as the Basel and Rotterdam Conventions.

Other Beneficial or Damaging Environmental Effects

None.

Degree of Involvement of Stakeholders in the Project

Considerable effort has been made to specify how broad stakeholder involvement and buy-in to the process of preparing National Implementation Plans is to be promoted, including where necessary, the allocation of some funding through grants to so-called “grass-roots” organizations. In this respect, the project is extremely well conceived.

Capacity-Building Aspects

Implicitly, this project deals with capacity building in representative countries. It also extends to knowledge improvement and capacity building in neighbouring countries and, ultimately, to facilitating extended capacity building at a global level. As noted previously, the sustainability of the capacities developed within this project will become a matter of concern to the Contracting Parties to the POPs Convention. One of the major advantages of this project is that it actually considers and allows for capacity building in the broader sense – in relation to a larger suite of persistent toxic substances, including those that result in sustained long-term exposures because of their continuous release to the environment, rather than purely the twelve POPs. This reflects the foresight with which other previous GEF interventions in Operational Program 10 have been fostered to deal with the larger range of potentially damaging substances rather than confining the focus to the existing list of 12 substances of immediate relevance to the draft POPs Convention.

Innovativeness of the Project

The project proposal is not really innovative in the conventional sense of the word. However, it does have some novel features that show that considerable thought has gone into its design such as the broad selection of participating countries, the provisions for the involvement, through consultation, of other neighbouring countries, and the manner in which it promotes and facilitates broad governmental and non-governmental institution, industry sector and public involvement.

Other Matters

Preparation of Methodologies

It is not wholly clear what guarantees are provided regarding the compilation of a manual of existing methodologies from specialised national, non-governmental and international organizations for provision to the participating countries at the beginning of the project (*i.e.*, prior to August 2001) (Paragraph 22 and Implementation Timetable of the proposal). The concept of doing this is a good one, but there appears to be no specific reference to a commitment by an individual or organization to undertake this work prior to the commencement of the project. This also extends to some of the responsibilities covered under Paragraph 26 of the proposal beyond those expressly covered by the consultative processes built into the project.

Mid-Term Review

The prior commitment to the conduct of a mid-term review of the project contained in the proposal is appropriate.

Timetable

Overall, the timetable seems reasonable. However, the timing of the Second Steering Group Meeting (January 2003) does not permit either the priority-setting exercise or the second stage of the global guidance consolidation to have been completed beforehand. Consideration should be given to adjusting the timetable by delaying the Second Steering Group Meeting to allow these elements to be completed and considered during the meeting.

Accountability

The project proposal includes draft terms of reference for the Project Manager and National Coordinators. These appear to be appropriate. However, issues of accountability and authority do not appear to have been considered in the proposal as a whole. Some consideration should be given to such issues in the context of problem resolution within the project brief.