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Ministry of Environment
Republic of Maldives

United Nations Development Programme

Annotated Project Document template for nationally implemented projects financed by the GEF/LDCF/SCCF Trust Funds

Project title: Eliminating POPs through sound management of chemicals		
Country: *Republic of Maldives*	**Implementing Partner:** *Ministry of Environment*	**Management Arrangements:** National Implementation Modality (NIM)
UNDAF/Country Programme Outcome: *UNPDF 2016-2020 Outcome 4: By 2020, growth and development are inclusive, sustainable, Increase resilience to climate change and disasters, and contribute to enhanced food, energy and water security and natural resource management*		
UNDP Strategic Plan Output: *Outcome 1: Growth and development are inclusive and sustainable, incorporating productive capacities that create employment and livelihoods for the poor and excluded; Output 1.3: Solutions developed at national and sub-national levels for sustainable management of natural resources, ecosystem services, chemicals and waste.*		
UNDP Social and Environmental Screening Category: *medium*	**UNDP Gender Marker:** *Gen 2*	
Atlas Project ID (formerly Award ID): ATLAS Project Award: 00097168	**Atlas Output ID (formerly Project ID):** ATLAS Project ID: 00100995	
UNDP-GEF PIMS ID number: 5918	**GEF ID number:** 9562	
Planned start date: 01 January 2020	**Planned end date:** 31 December 2024	
PAC meeting date: 12th November 2019		
Brief project description: The project aims to reduce the risks of POPs on human health and the environment through strengthening of the institutional capacity, and the policy and regulatory framework for the environmentally sound management		

(ESM) of hazardous chemicals with focus on POPs. Technically, the project will develop sustainable systems for the sound collection, labeling, storage, and disposal of hazardous POPs chemicals and waste.

Global Environmental Benefits (GEBs) will be achieved by reducing the release of Unintentional Persistent Organic Pollutants (U-POPs) and Polychlorinated Biphenyls (PCBs) through the introduction of Best Environmental Practices (BEP) and Best Available Techniques (BAT) at the regional, municipality level, and at tourist resorts. Gender mainstreaming will target the community level to strengthen women's decision-making tool and awareness about hazardous POPs. The project is structured in three components:

- Component 1: Strengthening the regulatory and policy framework and institutional and technical capacity for the sound management and disposal of POPs, chemicals and wastes.
- Component 2: Establish systems for the sound collection, labeling, storage and disposal of hazardous chemicals and wastes.
- Component 3: Monitoring and learning, adaptive feedback, outreach and evaluation.

FINANCING PLAN	
GEF Trust Fund	USD 3,675,000.00
UNDP TRAC	USD 65,000
(1) Total Budget administered by UNDP	**USD 3,740,000.00**
PARALLEL CO-FINANCING	
Government	USD 57,877,272.96
Private Sector	USD 1,473,803.75
(2) Total co-financing	**USD 59,351,076.71**
(3) Grand-Total Project Financing (1)+(2)	**USD 63,091,076.71**

SIGNATURES

Signature: **Dr. Hussain Rasheed Hassan** **Minister** **Ministry of Environment**	**Agreed by Government**	**06 February 2020:**
Signature: **Dr. Hussain Rasheed Hassan** **Minister** **Ministry of Environment**	**Agreed by Implementing Partner**	**06 February 2020:**
Signature: **Akiko Fujii** **Resident Representative** **UNDP Maldives**	**Agreed by UNDP**	**06 February 2020:**

I. TABLE OF CONTENTS

Table of Figures

Table of Tables

II. DEVELOPMENT CHALLENGE

1. The Republic of Maldives is a Small Island Developing State (SIDS) which faces sustainable development challenges such as small but growing populations, land scarcity, vulnerability to climate change impacts (and other natural disasters) as well as economic development problems due to high transportation costs, lack of adequate infrastructure and lack of industrial development incentives.
2. The Maldives is an archipelago comprised of 1,190 coral islands in 26 atolls over an area of about 750 km on a north-south axis and 120 km on an east-west axis. The land area of the Maldives accounts for about 1% of the country's territory. The Maldives' islands are low lying land areas with an average height above sea level of 1.8 meters (m). The country's population of approximately 344.023 people (174,666 male and 169357 female; National Bureau of Statistics, September 2014) lives on 198 of the 1,190 islands in the Maldives. An additional 80 islands have tourist resorts. Waste generation is estimated to be 324,000 tons annually with consisting of approximately 0.5 to 11% of hazardous chemicals and of approximately 3-9% of plastics depending on location and size of the island.
3. The fact that (chemical) waste is being generated on 278 island presents the country with an incredible challenge, as land is very scarce, low lying and transportation of chemicals and waste from island to island is costly and complicated. The inadequate storage options and current disposal practices of hazardous chemicals and waste, especially open burning of waste at dumpsites or disposal near the Indian Ocean, make it very likely that these toxic chemicals and waste will end up in the waters and oceans.
4. In the Republic of Maldives, the tourism sector accounts for 25 percent of the Gross Domestic Product (GDP) of the economy. Tourists to the Maldives are seeking a pristine environment, not one with polluted waters, degraded coral reefs, waste dumps which are openly burning or waste floating in the ocean. Therefore, the Sound Management of Chemicals and waste, especially the environmentally sound management of Persistent Organic Pollutants (hereinafter referred to as POPs) and hazardous waste, is an important element to achieving environmental sustainability. Further, given the economic importance of tourism to the Maldives, implementing environmentally sound chemical and waste management systems would help decouple growth in the tourism sector from environmental degradation.
5. Apart from the tourism sector, the public is also affected by POPs releases, for example through the improper management and disposal of Polychlorinated Biphenyls (PCBs) or through the emission of unintentionally-produced POPs (u-POPs) from open burning of hazardous waste or releases during improper management of medical waste. Given the fact that there are no manufacturing industries in the Maldives, the presence of POPs can only be accounted for by the direct importation, incidental imports where they are contained in other products (e.g. e-waste), trans-boundary transfers, including marine and atmospheric, incomplete combustion of solid and chemical waste materials burned in the country, or unsound final disposal of medical waste (Annex T).
6. To tackle these environmental and human health risks, the Government of the Republic of Maldives through the Ministry of Environment (MoEn) has already taken some steps to try to manage its growing chemicals and waste management problems. The country has ratified the Stockholm Convention (SC) on 17 October, 2006 and in accordance to Article 7 of the Convention has submitted its National Implementation Plan (NIP) to the Stockholm Convention Secretariat (SCS) on 18 July, 2017, which covers the initial POPs as well as the new POPs added at the 4th and the 5th Conference of the Parties. According to this NIP the highest ranking national priorities are the following:

    a) First Priority: The Implementation of measures to strengthen the institutional and regulatory framework; which includes the (i) developing legislation for chemicals management; (ii) strengthening institutional capacity; (iii) improving data collection and management systems and (iv) conducting research on the effects of POPs;
    b) Second Priority: Developing an action plan to eliminate PCB-containing equipment and its waste by 2025, which includes the (i) identification, labeling and mapping where PCBs and equipment potentially-containing PCBs are located in the country); (ii) putting in place labelling mechanism for all PCB-containing equipment; (iii) establishing adequate storage facilities for replaced equipment-

containing PCBs; (iv) formulating guidelines for disposal of equipment-containing PCBs; and (v) disposing safely of equipment containing PCBs.

c) Reducing the incineration and open burning of wastes (including medical and hazardous waste), which is the source of 98.6% of U-POPs releases in the country- totaling 153.4 g-TEQ/year;
d) Raising awareness through the development of education curricula and targeted awareness campaigns;
e) Establishing a standard Chemical Management System, including chemical labeling in multiple languages.

7. PCBs and U-POPs are among the most toxic and persistent POPs listed under the SC. In the Maldives, PCBs have been used for a variety of industrial uses, mainly as dielectric fluids in capacitors and transformers because of their chemical stability. PCBs are fire-resistant, have low electrical conductivity, high resistance to thermal breakdown and high resistance to oxidants of other chemicals. However, PCBs are also considered to be immunotoxic and might have adverse effects to the human body including damage to the immune system, reproductive system, liver and skin. The SC requires that all equipment containing PCB concentrations above 0.05% be phased out by 2025 and all PCBs are to be subjected to ESM for final disposal by 2028.
8. The production of U-POPs including polychlorinated dibenzo-p-dioxins (PCDD), polychlorinated dibenzofurans (PCDF), polychlorinated biphenyls (PCB) and hexachlorobenzene (HCB) are a result of incomplete combustion of anthropogenic sources such as open burning of waste (including medical waste), certain industrial processes, and other combustion-related activities. The national NIP indicates that open burning of waste is the major source of u-POPs in the country, which is typically used to reduce the waste volume and to dispose of combustible materials. According to the Solid Waste Management-Tourism Adaptation Project (TAP) Report, an estimated 860 metric tons per day (mtpd), or 312,075 metric tons (mt) per year, of solid waste is discarded in the Maldives. About 21% is attributed to tourism with the balance divided among urban areas (65%) and island communities (35%). The NIP says that most of the municipal waste is often incinerated together with hazardous chemicals, whether through intentional fires set to recuperate valuable waste streams and compact the volume of the waste, or unintentionally through careless handling of fire and coincidental combustion of waste and chemicals.
9. Hence, POPs and chemical management are now national priorities, as evident from their recurrence as core themes of successive national development and tourism plans (see paragraph 17 Consistency with National POPs Priorities). Sound chemicals and waste management aligns with Goal Number 6 of the Maldives National Strategy for Sustainable Development (2010- 2020) that states the importance of ensuring that chemicals, including pesticides are handled and used in ways that do not pose significant threats to human and environmental health.
10. Since the Maldives SC ratification in 2006, there have been initial attempts towards drafting a chemicals regulation as well as implementing sound waste management systems. However, the full aspects of POPs and hazardous wastes have not been taken into full consideration by the regulations. For example, the Environment Protection and Preservation Act (Law No 4/93), the law on Importation of Prohibited Items to the Maldives 4/75 or the Waste Management Regulation have particular provisions for the environmentally sound management of chemicals and hazardous wastes, whereas the solid waste management bill is still in drafting stage.
11. There are significant remaining challenges with regards to the enforcement and implementation of chemicals-related laws. Although MoEn is in charge of POPs-related issues, holistic chemical management is devoted among a wide range of stakeholders which makes coordination and implementation lengthy and ineffective. There is lack of government capacity, strategies and guidance's to ensure commitment with the laws. Technically, there are gaps in POPs monitoring capacity, technical expertise, BAT&BEP equipment, knowledge and awareness.
12. Nevertheless, the Government is now committed to implement its NIP priorities and to address the emerging POPs issues with the technical and financial assistance of this first GEF-funded full-sized project in the area of chemicals and waste.

13. This project aims to protect human health and the environment by reducing or eliminating POPs use and unintentional production. The following barriers were the most critical ones to be considered as the project strategy was developed and the Project Development Framework (PDF) was articulated.

- ***Lack of coordination mechanism among relevant stakeholders*****:** POPs, chemical and waste management involves a wide range of governmental and non-governmental stakeholders which have different roles and responsibilities along the chemical life cycle. However, in the Maldives there is lack of coordination among these stakeholders which led to long-lasting, repetitive consultation processes, lack of information exchange, duplication of efforts and even to conflicts of interests.
- ***Unenforced legislative and policy framework for sound management of chemicals, including POPs*****:** Legal instruments to regulate import, storage, transport, use and disposal of POPs are lacking or inadequate, while the Waste Management Regulation has not been finalized. Accelerating the enactment of laws is slow (e.g. the Chemical Regulation is still being drafted) due to lack of national coordination and political will of involved stakeholders. Although all POPs, except PCBs, listed under the SC are officially banned in the Maldives it is not tied to any legislative norm and enforcement and proper monitoring procedures.
- ***Lack of data availability on chemicals imports, use and disposal:*** All chemicals are imported into the Maldives, with import data managed by the Maldives Customs Service (MCS), while the Ministry of Defence (MoD) provides import permits and keeps a record of volumes of permitted chemicals imported into the country as per law 4/75, Act on Goods Prohibited to be imported into the Maldives, Drug Act, Article 5. MoD (with financial support provided by the Ministry of Environment) has made attempts to establish a Central Chemical Management System (CCMS) within the network of the National Centre for Information Technology (NCIT). However, the database does not include POPs chemicals or POPs-containing articles; thus, there are no information related to import, use and disposal (intentionally or unintentionally) of POPs and POPs-containing articles. In addition, a Pollutant Release and Transfer Register (PRTR) is not yet incorporated into the CCMS which would allow regulatory authorities to capture POPs and other hazardous chemicals-related releases to air, water and soil and/or transferred off-site for treatment or disposal.
- ***Dispersed hazardous and waste generation,* collection, transport and disposal:** Due to its number of islands, the Maldives faces particular challenges such as transport infrastructure, remote locations and availability of local disposal options (e.g. for medical waste or e-waste) that are unique to SIDS, some of which are even unique to the Maldives.
- ***Lack of technical expertise and capacity, including availability of ESM practices and disposal infrastructure for hazardous chemicals, including PCBs****:* Currently there is no technical expertise to deal with POPs in the Maldives. Because there is no sufficient capacity for collection, separation, storage and disposal of different waste streams (especially hazardous chemicals and products-containing POPs), non-toxic and toxic waste is being disposed of together in dumpsites, which undergo open burning to reduce waste volume and/or anaerobic compaction. The release of u-POPs can be one of the negative impacts. In the case of PCBs, there are lack of environmentally sound technical expertise and capacity for storage, transport and final disposal.
- ***Lack of gender disaggregated data and no gender action plan:*** There is no gender disaggregated data on POPs management. There is no evidence on the disproportionate health effects on women; no sufficient data on who works in the waste management sector (private, community and household level); and no specific involvement of women in the drafting of waste and chemicals legislations.

14. In order to address the above-mentioned barriers the project will focus on addressing regulatory/policy barriers, technical and capacity and knowledge barriers so that the Republic of Maldives has a) a better foundation to establish a nationwide environmentally sound Management system to address POPs and highly hazardous chemicals, with b) the adequate coordination of key public, private and community stakeholders, regulatory departments, and centers of expertise, and c) the enhanced capacity of all involved, to run the ESM system effectively. Annex T outlines the baseline details for each project component, as gathered during the PPG phase.

15. In 2017, the Maldives was part of the voluntary national review for the high-level political forum on sustainable development goals. The implementation of the Sustainable Development Goals (SDGs) in the Maldives will be built upon the successes in the implementation of the Millennium Development Goals in the country. In this regard, the thematic focus of the current review will be on the substantive progress the country has made in the areas of health, education, gender, water and sanitation, energy, infrastructure, climate change and marine resources. To prioritize the national Sustainable Development Goals (SDGs), the country will carry out a rapid integrated assessment through consultations with implementing agencies, civil society and the private sector. The Maldives has established a National Ministerial Coordination Committee to provide overall policy guidance and political support towards the implementation of SDGs, supported by a Technical Committee on SDGs that brings together representatives from various government institutions and civil society. On monitoring, the country is identifying data gaps and will develop a monitoring framework to monitor and report on SDG targets achievements. It plans to organize focused awareness sessions for parliamentarians, local councils, and members of the judiciary, nongovernmental organizations (NGOs), students and the general public by the end of 2017.

16. Although national SDG priorities for environment are not yet defined, the project will directly support the Government of Maldives with the achievement of SDG number 1 *"No Poverty",* number 3 *"Good health and well-being",* number 5 on Gender Equality *"Achieve gender equality and empower all women and girls*", number 8" *Decent work and economic growth", SDG 9 "Industry, innovation and infrastructure"* and SDG Number 12 *"Responsible consumption and production*. Indirectly the project will contribute to SDG umber 6 "*Clean Water and Sanitation*", SDG 13 *"Climate Action*" and SDG 14 *"Life below water"* because through the environmentally-sound set-up of hazardous waste management it is likely that less waste will be dumped into the oceans or burnt in an uncontrolled manner. The proposed project is consistent with Goal no. 6 of the Maldives National Strategy for Sustainable Development (2010-2020) that states the importance of ensuring that chemicals, including pesticides, are handled and used in ways that do not pose significant threats to human health and the environment.

17. The strategic objectives and main programmes of the NIP are the following:
    - **Institutional and regulatory strengthening measures** (*Develop legislation for chemicals management*: Set mechanism to address POPs within the chemicals legislation or regulation; Revise and harmonize existing mandates of all relevant institutions to incorporate and identify their responsibility in chemicals management. *Strengthen institutional capacity*: Capacity building of custom officers on inspection and identification procedures; Capacity building of staff handling chemicals for use, storage and disposal; Provide POPs chemical testing equipment for relevant authorities; Formulate a chemicals unit within the relevant institution. *Improve data collection and management systems:* Establish and update database of POPs in the country; Establish HS codes for all POPs and POPs containing equipment. *Conduct research on effects of POPs on health*.
    - **Use, identification, labelling, removal, storage and disposal of PCBs and equipment containing PCBs**. Develop an action plan to eliminate PCB-containing equipment and its wastes by 2025 (Identify, label and (map) where PCBs and equipment containing PCBs are located in the country; Labelling mechanism for all PCB containing equipment in place; Establish adequate storage facilities for the replaced equipment containing PCBs; Formulate guidelines for disposal of equipment containing PCBs; and, Safe disposal of equipment containing PCBs.
    - **Production, import and export, use stockpile and wastes of hexaBDE, tetraBDE, pentaBDE and HBB**: Develop an information sharing platform; Improve awareness on EEE and WEEE.
    - **Production, import, and export, use stockpiles and wastes of PFOS, its salts and PFOSF.** Action plan for safe disposal and monitoring of PFOS containing firefighting foam.
    - **Action Plan to reduce releases from unintentional production**. Develop an action plan to reduce releases from UPOPS (Conduct baseline study to identify hotspots, especially for open burning of waste; Set up segregation and recycling mechanism; Establish incinerating facilities; and Establish monitoring system for UPOPs emissions and releases).
    - **Measures to reduce releases from stockpiles, articles and wastes (Article 6)**. Develop an action plan to identify, manage and reduce releases from stockpiles, articles and wastes.

- **Facilitating or undertaking information exchange and stakeholder involvement & Public awareness, information and education (Article 10)**. Establish mechanism for information exchange between Parties to Convention; Enhance awareness mechanisms.
- **Effective evaluation**. Ensure effective compliance mechanism.
- **Reporting**. Establish a data sharing electronic mechanism.
- **Research, development and monitoring**. Improving sampling and analysis of POPs in Labs.
- **Technical and financial assistance.** Strengthen financial and technical capacity.

III. STRATEGY

18. This proposed five-year project directly relates to GEF-6 Chemical and Waste focal areas: CW-2, Program-3: Reduction and elimination of POPs. Specific milestones of the Stockholm Convention will be targeted to meet the deadlines to complete replacement of PCBs contaminated oil and equipment with PCB-free units (2020), to complete the phasing out (2025), and for the destruction of PCB-containing oil and equipment (2028).
19. The Ministry of Environment (MoEn) is in charge of the implementation of the SC on POPs and has ratified the Convention on 17 October, 2006 and in accordance to Article 7 of the Convention has submitted a National Implementation Plan (NIP) to the Stockholm Convention Secretariat on 18 July, 2017. The proposed project is designed to meet Maldives obligations under the SC, as it tackles priorities actions on legislation, PCBs and u-POPs from the NIP.
20. The project aims is to reduce the risks of POPs on human health and the environment through strengthening institutional capacity and the policy and regulatory framework for the sound management and disposal of chemicals, POPs and wastes, and developing sustainable systems for the sound collection, labeling, storage, and disposal of hazardous chemicals and waste.
21. The project will be implemented by UNDP as GEF´s Implementing Agency and MOE as national executing agency to ensure that the framework, technical capacity and knowledge management will led to the final disposal of at least 24 metric tons of PCB-containing oil, equipment and waste and the prevention of at least 15 g-TEQ PCDD/F through the BAT/BEP pilots (which is 10% of total u-POPs releases).
22. Based on the development challenges, the identified problems will be addressed through the following solutions:

Regulatory barriers and capacity:

a. **Problem:** Legal instruments to regulate import, storage, transport, use and disposal of chemicals are lacking or inadequate, while the Waste Management Regulation has not been fully implemented. Accelerating the enactment of laws is slow (e.g. the Chemical Regulation is still being drafted) due to lack of national coordination and political will of involved stakeholders. In addition, there is no unique institutional body on the management of chemical substances, including POPs in the Maldives, and perhaps there is no such need for a unique institutional body, or a single specialty chemicals regulatory framework, provided that there is good inter-correlation between stakeholders and implementing agencies. This would need to be strengthened during project implementation.

b. **Proposed solution:** Advance the development and adoption of regulatory measures pertaining to POPs and SMC and introduce economic instruments and incentives (EPR, PPP) to reduce POPs and other harmful releases

a. **Problem**: Chemicals are not produced, but imported, used and disposed of in the country. Because there is no chemicals database, analytical capacity nor national legislation on chemical safety, the Ministry of Defence (MoD) has started the establishment of a Central Chemical Management System (CCMS), however, it does not included POPs information or a Pollutant Release and Transfer Register (PRTR) which would allow regulatory authorities to capture POPs and other hazardous chemicals-related releases to the environment.

b. **Proposed solution:** A harmonized Central Chemical Management System (CCMS) established within National Centre for Information Technology (covering chemicals' import, use, storage, management, disposal, POPs and PRTR system)

a. **Problem:** There is a lack of technical expertise, practical guidance and training material for regulatory authorities to enforce POPs and chemicals-related regulatory measures, including knowledge of appropriate financial or economic instruments.

b. Proposed solution: Capacity at regulatory authorities strengthened (through trainings, guidelines, technical equipment) for the development and effective enforcement of regulatory measures related to inspections, transportation, storage, use and disposal of POPs, hazardous chemicals and wastes.

a. Problem: Because there is no sufficient national capacity and guidance for the inspection, identification and monitoring of chemicals, and products containing chemicals of concern, these issues will addressed under the project. Then to ensure compliance and consistent working procedures among all relevant stakeholders adequate training is necessary.

b. Proposed solution: Maldives Customs Service (MCS), Ministry of Defence (MoD), National Drug Agency (NDA) and other responsible authorities trained on inspection, identification and monitoring procedures for chemicals, and products containing chemicals of concern.

Technical capacity barriers:

a. **Problem:** PPG has showed that the preliminary inventory conducted during the NIP needs to be completed. This activity has started during PPG and needs to be completed during first year of project implementation. There is no analytical capacity nor labeling and GIS-mapping of potentially-containing equipment and waste

b. **Proposed solution:** Inventorize, analyze, label and map PCBs containing equipment and waste present in the country

a. **Problem:** Besides the lack of PCB-related legislation, there are no environmentally sound guidelines and management plans, including disposal plans available in the country. There is also on national capacity for final disposal of PCB-containing equipment, oil and waste.

b. **Proposed solution:** Facilitate the environmentally sound management and disposal of 24 tonnes of PCB-containing oil, PCB containing equipment and waste oil abroad.

a. **Problem:** Because of the increasing quantities of waste, changes in consumption patterns and lack of integrated waste management procedures along the waste management cycle, including separation and final disposal, hazardous waste is being dumped (along with solid) waste in the water or is being burnt to reduce the waste volume. The preparations and plans for regional waste management facilities are on-going; however, they do not include a chemicals component, including measures to reduce separation of waste and u-POPs reduction activities.

b. **Proposed solution:** Develop the capacity of regional waste management facilities and waste management actors for the sound management, interim storage, transport and disposal of hazardous and toxic wastes

a. **Problem:** Currently, there are no BEP and BAT practices and experiences to reduce POPs releases from waste management, including guidelines and technical expertise.

b. **Proposed solution:** Introduction of BEP and BAT to reduce POPs releases from waste management

Knowledge management and training barriers:

a. **Problem:** This project will set the regulatory framework and pilot demonstrations projects, however, the project sustainability and up-scaling needs to be ensured through proper documentation and lessons learned.

b. **Proposed solution:** Experiences, case studies, lessons learned and best practices collected, captured in knowledge products and disseminated at national and global level to support replication

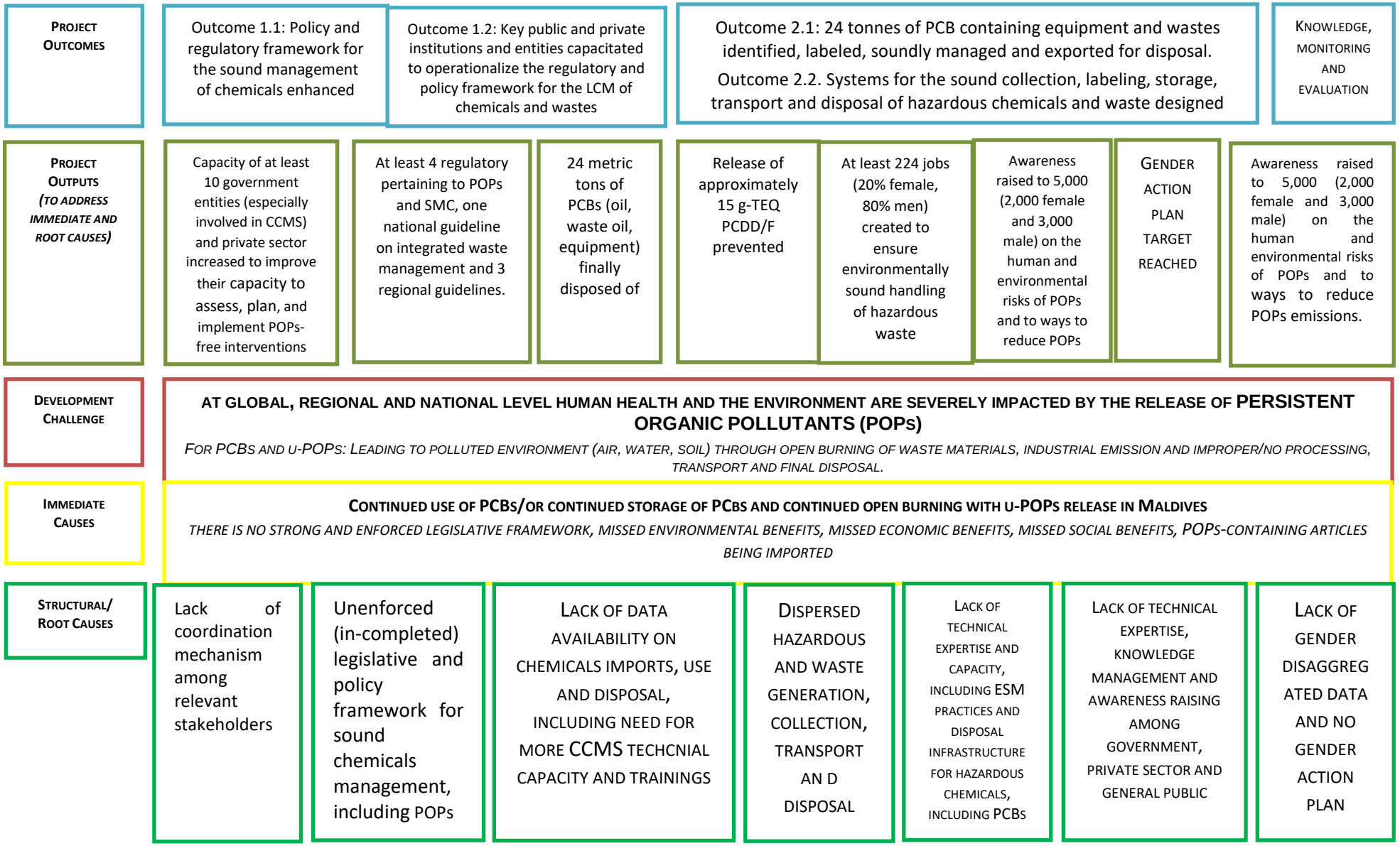
a. **Problem:** There is lack of knowledge about POPs and related environmental and human health risks among different stakeholders of the project.
b. **Proposed solution:** Undertake awareness raising targeted at households, chemicals users, industries and decision makers

a. **Problem**: The barriers to training for the gender pilots on the islands include: inadequate resources allocated to developing training materials and contracting trainers; the cost of travel to the islands and/or bringing participants to Male; whether social roles, including gender-specific or gender-determined roles, both social and occupational, that directly impacts women
lack of participation from the women on the islands; lack of buy in from the local councils or whether the local councils do not support the WDC trainings; lack of support from the Project itself.

b. **Proposed solution**: Implementation of a gender action plan to better empower women (and women´s groups) through capacity building and structural adjustments in relation to environmentally sound hazardous waste management.

a. **Problem:** There is a need for continuous project management monitoring and evaluation to ensure adaptive project management.
b. **Proposed solution: M&E and adaptive management applied in response to needs**

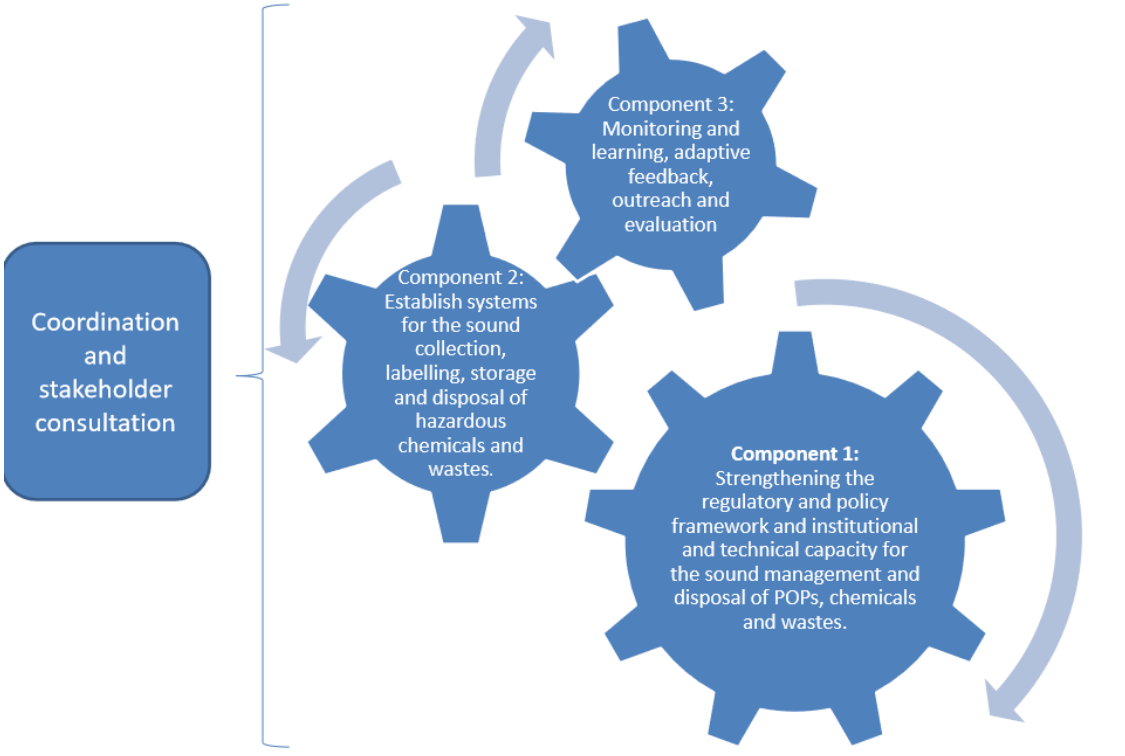
Figure 1: Theory of Change



23. Based on Figure 1 and Figure 2, the project will have the following components and outcomes. Details of the outputs and activities can be found the section "Results and Partnerships":

- Component 1: Strengthening the regulatory and policy framework and institutional and technical capacity for the sound management and disposal of POPs, chemicals and wastes
  - ➢ Outcome 1.1: Policy and regulatory framework for the sound management of chemicals enhanced (details in Annex K and W)
  - ➢ Outcome 1.2: Key public and private institutions and entities capacitated to operationalize the regulatory and policy framework for the LCM of chemicals and wastes (details in Annex L and N)
- Component 2: Establish systems for the sound collection, labeling, storage and disposal of hazardous chemicals and wastes
  - ➢ Outcome 2.1: 24 tonnes of PCB containing-oil, equipment and waste oil identified, labeled, soundly managed and exported for disposal (Annex U).
  - ➢ Outcome 2.2: Systems for the sound collection, labeling, storage, transport and disposal of hazardous chemicals and waste designed (details in Annex U).
- Component 3: Knowledge, monitoring and evaluation
  - ➢ Outcome 3.1: Project results sustained and replicated and awareness raised.

Figure 2: Project Components



24. The Monitoring and Evaluation component is described in detail in Section VII (Monitoring and Evaluation Plan). As for the knowledge management, the work of the project will build on existing experience gained in baseline projects or GEF-projects. UNDP has to-date been implementing PCB and u-POPs projects in all

regions and lessons learned from these projects (e.g. evaluation reports) will be used for effective project implementation. In addition, Stockholm Convention's mechanisms like the PCB Elimination Network (PEN) and participation in collective information events such as webinars organized by the Stockholm Convention Secretariat will be utilized as knowledge management tools.

Financial strategy

25. The project will be GEF-funded with a grant of US$ 3,675,000 and co-financing of 19,899,771.

Incremental Costs Reasoning and expected contributions from the baseline as well as co-financing

26. Annex T summaries the associated baseline projects and Table C of Part I of the CEO endorsement summaries the co-financing for this project. Table 9 summarizes the incremental and catalytic contribution of the alternative scenario in comparison with the baseline project has been summarized by project component.

Table 1: Comparison of the baseline scenario with the alternative scenario to be supported by GEF

Baseline scenario	**Alternative scenario to be supported by the GEF**
The import and use of chemical substances, including POPs, is regulated by the Constitution of the Maldives legislative acts and normative-methodical documents. However according to the NIP (2016) analysis of existing legislation on POPs treatment shows the lack of a normative base for POPs treatment. One of the main challenges encountered in improving the management of POPs, chemicals and their wastes in the country is the fact that legislation regulating certain aspects of chemicals (such as Waste Management) and draft bills of regulations specific to chemicals (such as the Pesticides Bill and the Chemical Regulation) do exist in the country but are not yet adopted or implemented/enforced properly. The same goes for Article 5 of Law no 4/75 "Substances prohibited to be brought into the Maldives", for which the ministry has formulated the relevant regulation as stated in Article 5, however, it is yet to be implemented. The implementation of these regulatory aspects has been said to be delayed due to the unavailability of trained staff, lack of technical capacity, lack of financial resources, lack of high-level commitment and responsibility in comprehending the real impacts of such laws, the lack of a national chemicals database, the lack of a general baseline indicating the usage and disposal of these chemicals, a lack of analytical capacity, among other aspects.	To address these challenges, **Component 1. Strengthening the regulatory and policy framework and institutional and technical capacity for the sound management and disposal of POPs, chemicals and wastes will focus on achieving two (2) Outcomes:** **Outcome 1.1: Further enhance the policy and regulatory framework for the sound management of chemicals.** **Outcome 1.2: Capacitate key public and private institutions and entities to operationalize the regulatory and policy framework for the LCM of chemicals and wastes**. The project will achieve this by: 1. Advancing the development and adoption of regulatory measures pertaining to POPs and SMC (Output 1.1.1) 2. Introduce economic instruments and incentives (EPR, PPP) to reduce POPs and other harmful releases (Output 1.1.1) 3. Establish a harmonized Central Chemical Management System (CCMS) (covering chemicals' import, use, storage, management, disposal, POPs and PRTR system) (Output 1.2.1) 4. Strengthen capacity at regulatory authorities for i) inspection, ii) the development and effective enforcement of standards/ guidelines related to collection, transportation, storage, use and disposal of POPs, hazardous chemicals and wastes (Output 1.2.2 and Output 1.2.3) **GEF Grant requested: USD 700,000**
Since the ratification of the Stockholm Convention in 2006,	To improve the country's situation pertaining to PCBs,

there has been no specific action towards the environmentally sound management of POPs at national level. The 2016 NIP identifies PCB management as the most urgent priority of the country in terms of POPs management. According to the PCB inventory (undertaken as part of the NIP), potentially PCB containing equipment is present on the five (5) most populous islands of the Maldives. The inventory results indicated that there are 18 potentially PCB containing electrical units, made up of 15 electric transformers and 3 oil filled circuit breakers. The total volume of potentially PCB containing oil is 6,100 liters, made up of 5,819 liters of transformer oil and 282 liters used in oil filled circuit breakers. Although the PCB holders have the capacity and have committed co-financing to phase-out PCB containing/contaminated equipment, there are no solutions for the safe disposal of PCB oils and PCB containing equipment at national level. Another priority, as identified by the NIP and the NCP is (hazardous) waste disposal/storage infrastructure. There is a complete lack of infrastructure for both the collection and disposal of hazardous and chemical wastes. There is no designated area for disposing chemicals or hazardous waste and consequently no facility that fulfils environmental criteria for disposing such types of wastes or chemicals exists. Further linked to the unsound management of (hazardous) waste, is the release of UPOPs from the open burning and incineration of wastes (household as well as hazardous wastes), which are responsible for 25.6% and 73% of the country's UPOPs emissions respectively. It is for this reason that the reduction of UPOPs releases from waste burning/incineration is listed in the NIP as one of the country's main POPs priority.	**Component 2. Establish systems for the sound collection, labeling, storage and disposal of hazardous chemicals and wastes, Outcome 2.1. 24 tonnes of PCB containing oil, equipment and waste oil identified, labeled, soundly managed and exported for disposal, will have as objective the identification, labeling, export and disposal of PCB containing equipment and wastes.** The project will achieve this by: 1. Inventorizing, analyzing, labeling and mapping PCBs containing equipment and waste present in the country (Output 2.1.1) 2. Facilitating the environmentally sound management and disposal of 24 tonnes of phased-out PCB containing equipment and waste abroad (Output 2.1.2) In order to support the country in addressing its challenges related to the collection, disposal/treatment of hazardous/chemical wastes and reduce POPs and PTS releases from unsound disposal and treatment practices of these types of wastes, the project will: 1. Develop the capacity of regional waste management facilities and waste management actors for the sound management, interim storage and disposal of hazardous and toxic wastes. 2. Introduction of BEP and BAT to reduce POPs releases from waste management: (i)Introduce/incorporate BEP/BAT approaches for POPs, POPs containing wastes and hazardous wastes into existing and planned Regional Waste Management Systems. Such interventions will include the introduction of BEP and BAT and training of waste operators and handlers, in how to reduce harmful releases from waste management centers and dumpsites, which will lead to a reduction in the open burning and accidental catching on fire of waste management centers and dumpsites. (ii) Demonstrate the phase-out of low technology incinerators at selected tourism resorts, through waste reduction efforts, increased recycling/reuse, and integrating the management of their residual waste into existing or to be established Regional Waste Management Systems. Such interventions would fit well within the country's objective to make its tourism sector more sustainable. (iii) Introduce BAT/BEP to reduce u-POPs at municipality level taking into account proper separation and final disposal of hazardous waste such as medical waste from regional hospitals (because currently medical waste is burnt openly, burnt together with general waste, burnt in a waste burner or burnt in low technology incinerators)

	GEF Grant requested: USD 2,600,000
Nationwide there is lack of adequate knowledge management and training capacity to ensure that: a) Technical expertise on BAT/BEP for dealing with POPs among the life cycle is documented and disseminated; b) Training material, including environmental and health concern and BAT/BEP, is developed and stakeholders, including decision-makers, industries, chemical users and households are aware of sound management of POPs; c) Women (as part of the Gender Action Plan) are equipped with decision-making tools, training materials and specific awareness raising events	To ensure that awareness and training capacity is created, **Component 3: Monitoring and learning, adaptive feedback, outreach and evaluation, Outcome 3.1: Project results sustained and replicated and awareness raised**, will be implemented. **GEF Grant requested: USD 3,000,000**

IV. RESULTS AND PARTNERSHIPS

Expected Results*:*

Global Environmental Benefits

27. The Global Environmental Benefits (GEB) attributed to this project are associated with a reduction in the potential release of POPs, which include the environmentally sound final disposal of at least 24 metric tons of PCB-containing oil, equipment and waste oil, as well as the prevention of 15 g-TEQ PCDD/F releases which were generated from open burning practices and low-technology incinerators.

Socio-Economic Benefits

28. The project will bring several direct and indirect social and economic benefits. The activities related to the project itself will create some jobs for workers on eradication of PCBs. The acquisition, installation and operation of temporary storage facilities for PCB wastes, and any transportation of PCBs, created to support these PCB-related systems, will create jobs improving workers' socio-economic situation. As additional PCB waste is treated in the decontamination alternatives being established, the release of the harmful chemicals into the environment will be reduced, thereby reducing potential exposure to these toxic chemicals and protecting human and environmental health. The reduction of POPs through the development and adoption of a sound management system through this project will lead to a reduction in these hazards and decreased health issues. This will have significant benefits to vulnerable pregnant women and children, as well as the whole population. The education and awareness raising of the population on the safe management and disposal of other chemicals, and specifically POPs, will provide a direct socio-economic benefit through empowering women in the communities (including WDCs/women's groups/ NGOs etc) who are exposed to hazardous waste mainly through household responsibilities, including food preparation, child care, cleaning etc.
29. While the core objective of the project is to reduce releases of harmful chemicals and POPs, it brings additional benefits in terms of climate change through the two activity areas that are inherently climate beneficial i.e. increased recycling and material efficiency and better waste management. The municipal waste management and industrial waste management activities have important socio-economic dimensions, as they improve living conditions of the communities both in the urban industrial areas close to the open burning sites, as well as to those living on the islands. The diversion from burning all waste such as organic matter will have significant local health benefits because that waste is not constantly burnt. It will also increase natural fertilizers through composting. In addition to the community mobilization and activation, some additional employment and income generation opportunities will be created at the waste-sites which could help reduce poverty. A strong chemicals management system will also contribute towards the achievement of the SDGs in a number of ways.

Knowledge management

30. Knowledge management will be carried under Component 3 (please see). The communication networks in Maldives are strongly established and are the most reliable medium for awareness, capacity building and outreach. Maldives has 100% mobile network coverage while smartphones and Internet are commonly used.

Project description: Components/Outcomes/Outputs

31. In order to reduce the risks of POPs on human health and the environment and address the challenges that the Government of the Maldives faces in achieving the sound management and disposal of POPs, POPs containing wastes and reducing releases of POPs to the environment, the project proposes the following interventions:

32. COMPONENT 1. STRENGTHENING THE REGULATORY AND POLICY FRAMEWORK AND INSTITUTIONAL AND TECHNICAL CAPACITY FOR THE SOUND MANAGEMENT AND DISPOSAL OF POPS, CHEMICALS AND WASTES

33. The import and use of chemical substances, including POPs, is regulated by the Constitution of the Maldives, legislative acts and normative-methodical documents. One of the main challenges encountered in improving the management of POPs, chemicals and their wastes in the country is the fact that legislation regulating certain aspects of chemicals (such as Waste Management) and draft bills of regulations specific to chemicals (such as the Pesticides Bill and the Chemical Regulation) do exist in the country but are not yet adopted or implemented/enforced properly. The same goes for Article 5 of Law no 4/75 "Substances prohibited to be brought into the Maldives", for which the ministry has formulated the relevant regulation as stated in Article 5 and Article 182 of National Drug Act 2011/7, however, it is yet to be implemented.
34. It is for this reason that Project Component 1, will focus on achieving two Outcomes: Outcome 1.1: Further enhance the policy and regulatory framework for the sound management of chemicals and Outcome 1.2: Capacitate key public and private institutions and entities to operationalize the regulatory and policy framework for the LCM of chemicals and wastes. It will address priority 1 of the NIP.

Outcome 1.1 Policy and regulatory framework for the sound management of chemicals enhanced

Output 1.1.1 Advance the development and adoption of regulatory measures pertaining to POPs and SMC and introduce economic instruments and incentives (EPR, PPP) to reduce POPs and other harmful releases

35. As part of this Output, first and foremost the project will support the regulatory authorities, ministries as well decision makers in creating additional awareness on the importance of advancing the approval and adoption of pending regulatory measures pertaining to SMC (in conjunction with Component 4), and building (through Outcome 1.2) their capacity to get the regulatory framework approved and afterwards operationalized.
36. Although the project cannot be ultimately held responsible for the approval of these regulatory measure, considering this is the first POPs/chemicals project in the Maldives (with the exception of one GEF EA and one SAICM QSP TF project), it is important that the project helps advance the regulatory environment to the extent possible.
37. The already drafted Solid Waste Management Bill, Pesticides Bill and the Chemical Regulation will be strengthened by finalizing, testing and disseminating guidelines related to POPs and hazardous waste management.
38. Firstly, building upon these efforts and based on a detailed national hazardous waste assessment (using as a baseline the NIP, PPG and obtaining further detailed information on POPs, POPs containing products, or POPs precursors) national stakeholders will decide on which POPs and POPs containing products/precursors are considered the most pressing priorities and for which it is urgent that guidelines for their management (which would cover the entire process from import to the point of general/disposal), or import bans (for products containing POPs that cannot be managed in the country) will be formulated.
39. Secondly, the project will support the introduction of economic instruments and incentives (such as Extended Producer Responsibility (EPR), and Payment for Pollution Prevention (PPP)) to reduce releases of POPs and other harmful releases. Potential financial and economic incentives shall be introduced in the Maldives to provide sustainable long-term solutions and encourage the introduction of Best Available Technologies (BAT)/Best Environmental Practices (BEP), with a focus on POPs containing products, or

POPs precursors (products which through processing or burning could lead to the formation and release of POPs).

40. Activities under this output will be the following:
    - **Activity 1.1.1.1**: Establish national Project Steering Committee and National Advisory Committee, including policy development trainings to facilitate coordination relevant governmental stakeholders;
    - **Activity 1.1.1.2:** Review of existing legislative chemical/hazardous waste regulations to ensure POPs management aspects are properly addressed and sufficiently defined, including provisions for control for import, chemical classifications and listing, storage, handling, transportation and disposal;
    - **Activity 1.1.1.3:** Draft technical documents for the Draft Waste Management Bill to include (1) waste classification standards for hazardous and special wastes; (2) Standards for the storage, treatment and disposal of hazardous and special wastes; (3) the Prohibited and Restricted Substances List (to include tracking of PCBs); (4) Hazardous and Special Waste Management Plan;
    - **Activity 1.1.1.4:** Provide draft technical specification documents to support Draft Chemical Standards to include: (1) chemical classification standard; (2) Standards for the storage, transportation, and handling of chemicals;
    - **Activity 1.1.1.5:** National integrated waste management plan (IWMP) drafted addressing reduce, recycle and reuse of waste items; and adapted to selected regional waste management zones;
    - **Activity 1.1.1.6.** Based on Activity 1.1.1.5. Strengthen sub-regional regulatory framework and policies by developing a local and regional waste management plans for the Fuvahmulah and Feydhoo/Gan/Hithadhoo islands;
    - **Activity 1.1.1.7:** Guidelines and standards for handling of hazardous chemicals along the life cycle (import, use, handling and data management, storage, transport and disposal), with focus on BAT/ BEP for PCBs and u-POPs developed;
    - **Activity 1.1.1.8.** Based on PPG economic/incentives analysis, draft national-wide appropriate financial mechanism to encourage EPR and PPP.

Outcome 1.2 Key public and private institutions and entities capacitated to operationalize the regulatory and policy framework for the LCM of chemicals and wastes

Output 1.2.1 A harmonized Central Chemical Management System (CCMS) established within NCIT (covering chemicals' import, use, storage, management, disposal, POPs and PRTR system).

41. Data on the import of chemicals are managed by the Maldives Customs Service (MCS), while a record of permits and amount of chemicals that are permitted to be imported into the country is kept by MoD. As per law 4/75 (Act on Goods Prohibited to be Imported into the Maldives), Article 5 of the Act states that all dangerous chemicals (except for fireworks), acids and other poisonous items produced using these chemicals shall only be imported into the country with the prior written permission and approval (in the form of a permit) issued by MoD. MoD keeps records of (1) chemical and amount allowed to be imported, (2) importer details, (3) storage location, (4) intended use of chemical.
42. However, the country does not yet dispose of a database which captures the usage and disposal of POPs. As a result, there is no clear insight in how much chemical and hazardous waste is being generated and what type or quantities of harmful substances are being released to the environment. This in turn hampers monitoring, implementation of legislative measures as well as decision making at local and national level.
43. As a first step, the Ministry of Defence (MoD) (with financial support provided by the Ministry of Environment) started the establishment of a central chemical management system. However, there are a number of aspects that would require further support from this project. In order to ensure that the database/information system allows the country to report to chemicals-related Conventions, and monitor and improve the management and release of POPs (use, release, and disposal), the proposed project will ensure that the Central Chemical Management System (CCMS) is designed/adjusted in a way that allows the government to monitor POPs and keep an up-to-date POPs database. The following are minimum activities to be developed during project implementation:

- Identify and add data fields related to POPs to ensure that a customized and centralized database is developed and functional. For example, including data fields for information typically included in the permit (storage location, user id, etc) will allow reports to be generated to improve POPs tracking;
- Ensure customized reporting for restricted items that have special requirements such as PCBs;
- Review and update existing chemical restricted/prohibited lists to ensure all chemicals prohibited by the Stockholm Convention and other international standards are included;
- Develop national training, guidance and toolkits and conduct relevant trainings.

44. Furthermore, a Pollutant Release and Transfer Register (PRTR) system will be incorporated in the Central Chemical Management System (CCMS) which can capture potentially hazardous chemical substances, especially POPs, released to air, water and soil and transferred off-site for treatment or disposal.
45. Activities under this output will be the following:

- **Activity 1.2.1.1.** . CCMS´s database strengthened to be aligned with revised POPs regulations
- **Activity 1.2.1.2.** Capacity strengthened to ensure an efficient CCMS along the chemical life cycle, including analytical capacity;
- **Activity 1.2.1.3.** Practitioner guidelines for the CCMS developed and distributed, including (1) Government-wide restricted and prohibited chemical list ;2) Protocols for evaluation and approval of special requests of new chemicals.
- **Activity 1.2.1.4**. Officials and staff involved in CCMS are trained on chemical harmonization according to their needs

<u>Output 1.2.2 Capacity at the regulatory authority strengthened for the development and effective enforcement of standards/ guidelines related to collection, transportation, storage, use and disposal of POPs, hazardous chemicals and wastes</u>

46. The main priority identified in the NIP (2016) as the need for institutional strengthening of relevant institutions which have a mandate for the sound management of chemicals. In particular, the NIP requests the capacity building of government staff to support the development and effective enforcement of standards/guidelines related to the collection, transportation, storage, use and disposal of hazardous chemicals and waste.
47. The project will train staff of the regulatory authority (as well as other key stakeholder identified during the project's PPG phase) on policies and national planning, (waste and chemicals) assessments, BAT/BEP guidelines for priority chemicals, international standards, and other technical guidelines related to the collection, transportation, storage, use and disposal of hazardous chemicals and waste, with a particular focus on POPs, POPs containing products and wastes, and POPs precursors.
    - Activity 1.2.2.1. Technical capacity strengthened for regular national inspections
    - Activity 1.2.1.2: Relevant staff trained on updated regulatory measures

<u>Output 1.2.3 MCS, MoD and other responsible authorities trained on inspection, identification and monitoring procedures for chemicals, and products containing chemicals of toxic concern</u>

48. The NIP (see also Output 1.2.2) requests the capacity building of custom officers from the Maldives Customs Service (MCS), staff of the Ministry of Defence (MoD) as well as other relevant authorities in the area of inspection, identification, handling, transportation, storage, disposal and monitoring procedures for dangerous chemicals as well as products containing chemicals of concern.
49. It is important for the Maldives, which is in a remote location and for which import by shipping vessel is the principle avenue for the importation of chemicals, to ensure that the first point of entry of a chemical or product containing a chemical of concern into a country is well managed. For this reason, the project anticipates to train MCS customs officers, MoD staff and related responsible authorities on inspection and identification procedures.
50. Activities under this output will be the following:

51. Activities 1.2.3.1. Relevant staff trained on updated CCMS

COMPONENT 2. ESTABLISH SYSTEMS FOR THE SOUND COLLECTION, LABELING, STORAGE AND DISPOSAL OF HAZARDOUS CHEMICALS AND WASTES

52. This component, outcome 2.1. will address NIP priority 2, which is "the development of an action plan to eliminate PCB-containing equipment and its wastes by 2025, which should include: i) The identification, labeling and mapping where PCBs and equipment containing PCBs are located in the country; ii) Putting in place labeling mechanism for all PCB containing equipment; iii) Establishing adequate storage facilities for replaced equipment containing PCBs; iv) Formulating guidelines for disposal of equipment containing PCBs; and v) Disposing safely of equipment containing PCBs".
53. Outcome 2.2. will support the country in introducing BEP/BAT approaches for the sound management of hazardous wastes and reduce release of UPOPs from open burning and low technology incineration (at tourism islands).

Outcome 2.1: 24 tonnes of PCB containing equipment and wastes identified, labeled, soundly managed and exported for disposal.

Output 2.1.1 Inventorize, analyze, label and map PCBs containing equipment and waste present in the country

54. Based on the PCB verification efforts described in the baseline section, the project still needs to complete the following activities:
    - **Activity 2.1.1.1.** Expand details of current PCB inventory to include GIS locations of each PCB-containing transformer, switchgears and waste oil, including labeling

Output 2.1.2 Facilitate the environmentally sound management and disposal of 24 tonnes of phased-out PCB containing equipment and waste abroad

55. As part of this Output, the project aims to ensure that at least 24 tonnes of PCB-containing oil, equipment and waste oil is being safeguard and environmentally sound disposed of. To achieve this, the following activities will be implemented. Please note that according to the PCB inventory, FENAKA Corporation is expected to upgrade the electricity network from 3.3 to 11 KV systems in GN. Fuvahmulah. As seen from Table 1, 10 of the 15 potentially PCB containing transformers are located there, which may therefore be part of the phase-out plan. This would present a very time sensitive opportunity both in terms of co-financing as well as in ensuring that phased-out equipment is safely handled and stored awaiting its decontamination/disposal abroad.
56. Activities under this output will be the following:
    - **Activity 2.1.2.1.** Current PCB-oil and waste oil interim storage facilities upgraded to ensure environmentally sound storage;
    - **Activity 2.1.2.2.** ESM and disposal plan for PCBs-containing oil, equipment and waste oil developed, including cost-effective disposal options;
    - **Activity 2.1.2.3.** Undertake an Environmental Impact Assessment for the establishment/refurbishment of a secure storage facility for the temporary storage of phased-out PCB containing equipment and waste oil;
    - **Activity 2.1.2.4.** Undertake a risk assessment prior to the movement/transport of PCB containing-oil, equipment and waste oil from the various islands to a centralized interim storage facility(ies);
    - **Activity 2.1.2.5.** Train and equip service providers capable of undertaking packaging, transportation, and residual contamination clean-up for PCB wastes;
    - **Activity 2.1.2.6**. Transport PCB containing oil, equipment and waste oil to the centralized interim storage facility;
    - **Activity 2.1.2.2.** 24 tons of PCB-containing-oil, equipment and waste oilremoved, retrofilled and/or disposed of (through export to a qualified disposal facility).

Outcome 2.2 POPs releases from unsound disposal and treatment of (hazardous) chemicals and wastes reduced

Output 2.2.1 Develop the capacity of regional waste management facilities and waste management actors for the sound management, interim storage and disposal of hazardous and toxic wastes

57. There is a complete lack of national infrastructure for both the collection and disposal of hazardous and chemical wastes. Although significant interventions are currently being supported in the area of MSWM by among others the World Bank, Government of the Maldives, IRENA, OPID and others (see Table 8), unfortunately the management, disposal and treatment of POPs wastes, POPs containing products/precursors and other hazardous wastes have not been taken into account. According to the Waste Management Regulation, hazardous waste shall not be burned under any circumstances and cannot be dumped on any area of the Maldives. However that is the current situation.
58. Considering there are a critical number of MSWM regional activities being implemented or planned, this provides an excellent baseline and opportunity to ensure the management of hazardous waste is also being tackled at the same time. This can be done to ensure that BEP/BAT approaches for hazardous waste management are being integrated into on-going and planned Regional Waste Management Systems and technical capacity of entities and authorities is built to manage, treatment and dispose of these types of wastes. Thus, the activities under this output will build on the existing or planned MSWM which have been established other co-financing sources.
59. The proposed project aims to have work at three intervention levels:
    - First, at the regional level, aspects of waste segregation of hazardous waste will be incorporate into the Regional Waste Management System in Vandhoo (close to operation) and interim safeguarding of hazardous waste streams will be set up there. This introduction of BEP and BAT will be replicated in newly (to be established) waste management infrastructures/systems which include the Huvadhu Atoll regional waste management facility, Addu Atoll regional waste management facility and the establishment of Regional Waste Management System in Zone 1 Islands, Haa Alifu, Haa Dhaalu and Shaviyani Atoll. After this replication of practices it is assumed a tipping point has been reached and sufficient capacity among waste management entities will have been built to warrant that similar practices can be replicated elsewhere.
    - Secondly, the project will target low technology incinerators at tourism resorts;
    - Thirdly, BAT/BEP pilot at selected dumpsites at municipality level to ensure that waste is being segregated and recycled to reduce of the amount of waste being openly burnt.
60. Activities under this output will be the following:
    - **Activity 2.2.1.1.** Conduct in-depth national-wide inventory of municipal waste-related sources of PCDD/PCDF and specific for the regional waste facilities. For each of the regional waste management systems to be supported by the project, a POPs and hazardous waste assessment would be conducted. This assessment would also review current approaches and recommend BEP/BAT interventions (including cost estimates) for their improved management. Data generated through these assessments would be incorporated in the national information system (see Output 1.2.1);
    - **Activity 2.2.1.2.** Priority waste assessment in terms of u-POPs production by national stakeholders done. With national stakeholders the project is expected to decide which priority wastes (e.g. chemicals, POPs in products, e.g. E-waste,) cause the most harm in terms of being UPOPs/POPs generators, environmental degradation, health impact and which cannot be treated/handled by the existing approaches/infrastructure;
    - **Activity 2.2.1.3.** In coordination with Output 1.1.1 and Activity 2.2.1.2 develop guidelines for selected priority chemicals and wastes. These guidelines shall cover their entire life-cycle from the point of import to the point of treatment/disposal) and import bans for priority products will be drafted/instituted;
    - **Activity 2.2.1.4.** Set-up a collection, segregation and transport system for hazardous waste management to be integrated into the regional waste management facilities. Using co-financing from WAMCO and financing leveraged through the new EPR/PPP system (see Output 1.1.1), a collection,

segregation and transporting system for hazardous waste management will be established and integrated into each of the four (4) regional waste management systems; This activity will include the capacity building of waste management actors (WAMCO, government staff, waste haulage companies, waste handlers, etc.) in the sound management, interim storage and disposal of hazardous and toxic wastes;

- **Activity 2.2.1.5.** Based on activity 2.2.1.1. and cost-benefit analysis, set-up BAT/BEP approach for hazardous waste. The project in coordination with Output 2.2.2 will potentially introduce BEP/BAT approaches for hazardous waste management in case such approaches are deemed cost effective compared to export. BEP and BAT would be incorporated into existing Regional Waste Management Systems;
- **Activity 2.2.1.6.** In close coordination with Outcome 2.1 (interim storage of PCBs), explore possibility of a central or decentralized interim hazardous waste storage facility. In conjunction with the Regional Waste Management Systems a system for the interim storage of hazardous wastes which cannot be safely disposed/treated in the country is needed;
- **Activity 2.2.1.7.** In coordination with Output 2.1.2 "*Facilitate the environmentally sound management and disposal of 24 tonnes of phased-out PCB containing equipment and waste abroad"* demonstrate (on a one-time basis), the export of hazardous chemicals and wastes (including PCBs). The project will build the necessary capacity of chemicals related Convention Focal Points and their units (e.g. Stockholm, Basel, Minamata, Rotterdam) on clearance and PIC procedures and export of hazardous wastes for disposal abroad, so that gained experiences can be replicated in the future. This approach would also allow for the testing of the newly established EPR/PPP system (as part of Output 1.1.1), which is expected to cover the costs for disposal of non-POPs wastes.
- **Activity 2.2.1.8.** Development of the Environmental and Social Management Plan (ESMP) based on the SESP results and findings.
  As the SESP results identified the project as a high-risk project. The project requires the undertaking of an ESIA leading to the development of an ESMP prior to conducting work on project activities. This will be a priority activity during the initial stages of project implementation.

61. The latter activity would be implemented using experience from a UNDP/GEF project "Sustainable management of POPs in Mauritius" (GEF ID: 3205), where the project disposed of 139 tonnes of DDT, 5 tonnes of PCB contaminated, waste and 300 m3 of excavated POPs contaminated soil, and (using co-financing from waste holders) also dispose of non-POPs hazardous waste (making use of economies of scale – as total costs are mostly transportation related, not so much waste volume related).

Output 2.2.2 Introduction of BEP and BAT to reduce POPs releases from waste management

62. This output aims to introduce BEP and BAT to reduce harmful POPs releases from unsound waste management practices. Following the cost assessment, the identification/recommendation of potential BEP/BAT interventions and the prioritization of waste streams (all undertaken as part of Output 2.2.1).
63. Activities under this output will be the following:
    - **Activity 2.2.2.1.** Introduce/incorporate BEP/BAT approaches for POPs, POPs containing wastes and hazardous wastes (in case such approaches are deemed cost effective as compared to export) into existing the Regional Waste Management System at Vandhoo. Such interventions will include the introduction of BEP and BAT and training of waste operators and handlers, on how to reduce harmful releases from waste management centers and dumpsites, which will lead to a reduction in the open burning and accidental catching on fire of waste management centers and dumpsites. Details of this demonstration projects are in Annex V.
    - **Activity 2.2.2.1.** Demonstrate the phase-out of low technology incinerators at selected tourism resorts. This can be achieved through waste reduction efforts, increased recycling/reuse, and integrating the management of their residual waste into existing or to be established Regional Waste Management Systems. Details of this demonstration projects are in Annex V.

- **Activity 2.2.2.2**. Introduce BAT/BEP to reduce u-POPs at municipality level taking into account proper separation and final disposal of hazardous waste, including medical waste from regional hospitals because currently medical waste is burnt openly, burnt together with general waste, burnt in a waste burner or in a low technology incinerator. These efforts will built upon the available daily medical waste inventories and waste management plans (if).. Details of this demonstration projects are in Annex V.

COMPONENT 3. MONITORING AND LEARNING, ADAPTIVE FEEDBACK, OUTREACH AND EVALUATION

64. This project component's objective is, as reflected in associated Outcome 3.1 to capture and disseminate lessons learned and best practices and make them available at national, regional and global levels to allow for the replication of project results; Conduct awareness raising to change attitudes towards the management and disposal of POPs, chemicals and wastes; and Ensure adequate monitoring and evaluation of project progress and results.

Outcome 3.1 Project results sustained and replicated and awareness raised

Output 3.1.1 Experiences, case studies, lessons learned and best practices collected, captured in knowledge products and disseminated at national and global level to support replication

65. Even though the Project Implementation Reviews (PIRs), the Mid-Term Review (MTR), and the Terminal Evaluation (TE) report contain sections on lessons-learned (see Output 3.1.3), seldom are these lessons-learned consolidated and made easily available in an easy-to-share format. Therefore, at least once a year the proposed project will take stock of the experiences and lessons-learned to that date to ensure that this valuable information remains available to interested parties beyond the project's closure.
66. The project will capture such experiences and lessons-learned in easy to update, sharable and understandable communication materials/publications, and will make such knowledge products available on-line and ensure they are disseminated at national, regional and global level events (e.g. chemicals related international meetings – COPs, ICCM, etc.) to support replication. An important part of this project Output will be the exchange of experiences with countries in a similar situation through South-South Cooperation. For example, Mauritius and Comoros (which are also land scarce, climate sensitive and have limited opportunities for hazardous waste disposal in country because of financial in-sustainability) will be embarking on UNDP supported POPs and hazardous waste interventions around the same time. Such exchanges between the countries is critical, in particular because certain countries might be more advanced than others and can guide/demonstrate less advanced countries in improving practices in POPs and hazardous waste management.
67. Activities under this output will be the following:
    - Activity 3.1.1.1. Knowledge captured and targeted dissemination materials developed

Output 3.1.2 Undertake awareness raising targeted at households, chemicals users, industries and decision makers

68. At the start of the project, a communication/awareness raising plan will be developed and subsequently implemented over the duration of the project. This communications/awareness raising plan will focus on changing behavior and attitudes towards SMC and waste management, targeting politicians, decision makers, NGOs/CBOs, private sector entities managing wastes, waste pickers and recyclers, among many others. Depending on the means of communication most appropriate, various avenues for information dissemination will be considered and taken up in the plan (e.g. meetings, skits/plays, radio broadcasting, posters, internet, etc.).
69. Activities under this output will be the following:
    - Activity 3.1.2.1. Awareness raising campaign for decision makers on updated regulations with focus on PCBs and u-POPs;

- Activity 3.1.2.2. Awareness raising campaign for selected private sector on updated regulations, procedures and risks with focus on PCBs;
- Activity 3.1.2.3. Awareness raising campaign for selected pilots on updated regulations, procedures and risks with focus on u-POPs;
- Activity 3.1.2.4. Awareness raising and sensitization campaign for civil society organizations nationally and specific to communities related to u-POPs pilots;
-

<u>Output 3.1.3. Implementation of Gender Action Plan (GAP) to develop gender expertise, creating awareness raising campaigns and empowering the Women's Development Committees</u>

70. The Gender Action Plan (Annex G) recommends specific activities to ensure that all three components contain elements of Gender Equality and Women's Empowerment (GEWE.) These activities will focus on developing project gender expertise, creating awareness campaigns, and empowering the Women's Development Committees through capacity building and training. This will be occurring through targeted gender activities as outlined in Figure 3.

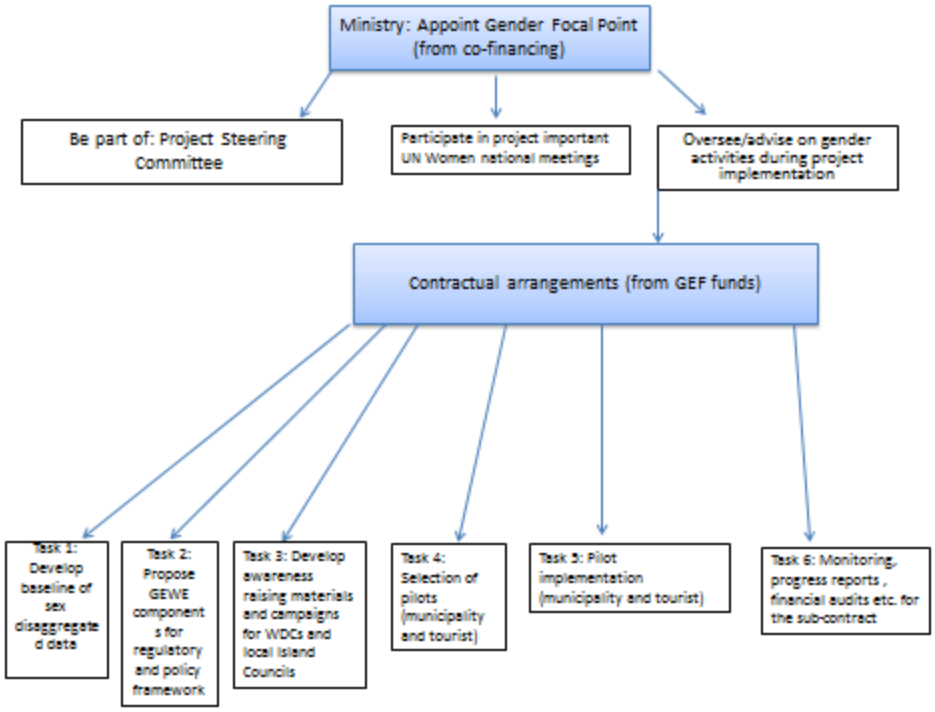


Figure 3: Gender Action Plan (outline)

71. Activities under this output will be the following:

- Activity 3.1.3.1. Complete existing national data on sex-aggregated data;
- Activity 3.1.3.2. Propose gender-aspects for the POPs-related legislative framework (under Component 1);
- Activity 3.1.3.3. Develop awareness raising programmes and training materials; and carry out training of trainers program
- Activity 3.1.3.4. Selection of pilot islands (based on criteria-setting);
- Activity 3.1.3.5. Pilot implementation at selected islands;
- Activity 3.1.3.6. Lessons learned prepared and disseminated

Table 2: Partnerships

Name of stakeholder/ initiative	What is the stakeholder/initiative currently doing to address the development challenge	What will be the role of the partner in project implementation	What are the assumptions and expected results (to be) achieved by partners that are critical for the achievement of the results of the project?
Ministry of Defence and National Security (MoD)	-The MoD regulates, amongst others, the import of dangerous chemicals into the country. -Maintains Chemical Database (Makudi)	The Ministry of Defence and National Security will partner with the project focusing on legislation and CCMS	-Data relevant to import of chemicals. -Collaboration in trainings and capacity building -Enhancing chemical Database, 'makudi'
Maldives National Defence Force (MNDF)	-MNDF enforces the final disposal of chemicals on behalf of MoD	The Maldives National Defense Force will partner with the project focusing on trade procedures and final disposal procedures for hazardous chemicals	-Data relevant to current procedures for disposal of chemicals. -Identify gaps and needs
Maldives Customs Service	-Regulating import and maintaining import statistics -verify chemicals imported into the country, authorize for importation, withhold any chemicals without such authorization, and discard it if required with consultation from key relevant institutions	The Maldives Customs Service will partner with the project focusing on ltrade procedures and final disposal procedures for hazardous chemicals as well as CCMS	-Data relevant to import of chemicals. -Identify gaps and needs within the institution for institutional strengthening and capacity building.
Ministry of Environment (MoEN)	The Ministry of the Environment and Energy is responsible for the Government's environmental, energy and climate policy. The Ministry works on issues concerning the climate, energy, biological diversity, chemicals, ecocycles, nature, marine and water environments and international environmental cooperation.	MoEn will be the Project's Executing Agency	Run the project smoothly in a timely and efficient manner
Environmental Protection Agency (EPA)	-regulatory compliance and environmental monitoring -regulate waste management	EPA will partner with the project focusing on	Information implementation of existing policies, laws and regulations, and disposal of waste.

	(incl. hazardous waste) and pollution. -set standards and guidelines for pollution prevention and waste management	legislation and CCMS as well as capacity initiatives	Identify gaps in implementation and capacity building.
Maldives Energy Authority (MEA)	-Regulator and the enforcer of all laws and regulations relevant to utilities (Law No. 4/96) -Set standards and guidelines for licensing and net metering.	MEA will partner with the project focusing on the chemicals legislation framework.	-Information implementation of existing policies, laws and regulations, standards and licensing.
Ministry of Health (MoH)	Ministry is responsible for ensuring the accessibility of quality health services , and ensuring the protection of public health	MEA will partner with the project focusing on the chemicals legislation framework as well as consultative partner for health issues.	-Information on existing policies, laws and regulations. -(acts as a parent body to both MFDA and HPA)
Maldives Food and Drug Authority (MFDA)	Certifying the import and export items of food and drugs.	MFDA will partner with the project focusing on the chemicals guidelines and chemicals certification procedures	-Information on certification, (and the procedure) of - import and export of food and drugs. - identify gaps and needs for improving the implementation of the existing guidelines and certification process. - identify gaps and needs for capacity building and technical assistance.
Ministry of Housing and Urban Development *(Previously Ministry of Housing and Infrastructure)*	Roles in relation to the reconstruction and demolition hazards included in the Building Act, its Regulation and standards	Will be consulted for activities 2 and 3 in relation to housing and demolition	-Available information provided, as adequate
Health Protection Agency (HPA)	Establish policies for protection of public health and implement them. Implementation of International Health Regulation, Capacity building of relevant stakeholders on chemical safety component	HPA will inform about legislation framework related to public health	-information on existing policies for protection of public health and its implementation Identify gaps and needs Strengthen capacity building
National Drug Agency (NDA)	Regulate policies related to the Law no.17/2010 and Article 182 (b) of 17/2011	NDA will inform about policies for maintaining drugs. Will be included	Information on policies (and the procedure) for maintaining drugs.

		for consultation for CCMS activities	
Ministry of Fisheries and Agriculture (MoFA)	- Develop standards and regulations related to the import and handling of pesticides and fertilizers. -updating data regarding pesticides and chemical fertilizers and fibreglass -licenses for the import of pesticides and chemical fertilizers.	MoFA will inform about legislative framework, procedures related to chemicals in the fisheries and agriculture sector. Will be included for consultation for CCMS activities	-information on chemicals used at the agricultural sector, procedures and licensing.
Maldives Police Service	Civilian national *police force* of the Republic of *Maldives*	Will be included for consultation for CCMS activities	Information related to public safety
National Centre for Information Technology (NCIT)	Development, promotion and propagation of Information Technology (IT) in the Maldives.	Will be included for implementation, consultation and development of CCMS activities, assistance in monitoring and hosting of the system in addition to designing of the system.	Smooth update of CCMS database and future operation and proper maintenance
Ministry of Tourism	Tourism-related laws and guidelines	MFDA will partner with the project on the u-POPs demonstrations	Smooth implementation of pilot project on Tourism resorts and phase out of low technology incinerators
Maldives Association of Tourism Industry (MATI)	The purpose of the Association shall be to enhance the development of the tourism industry of the Maldives	Consultation regarding the interests of the tourism industry, and to generate awareness.	Smooth implementation of pilot project on Tourism resorts and phase out of low technology incinerators
Ministry of Gender and Family	Review all laws and policies for compliance with Gender Equality Law, CEDAW, etc	The Ministry will partner with the project on the implementation of the Gender Action Plan	Smooth implementation of the Gender action Plan
Local Government Authority (LGA)	Provides technical inputs during the planning and design of the project document as well as	LGA will partner with the project on the u-POPs	Smooth implementation of pilot project, if applicable

	during the project's implementation.	demonstrations	
Male' City Council	Provide technical as well as policy level inputs during the project's development as well as implementation stage.	Will partner with the project on the u-POPs demonstrations	Smooth implementation of pilot project, if applicable
City Councils, Atoll Councils, and Island Councils	-Management and overall Administrative functions of the City/Atoll/Island. -Implementation and enforcement of laws and regulations. plan and implement projects related to development of the island	Will partner with the project on the u-POPs demonstrations	Smooth implementation of pilot project, if applicable
Maldives Transport Authority	Provides technical and policy inputs and information during the planning and design of the Project Document.	Will partner with the project on the u-POPs demonstrations	Smooth implementation of pilot project, especially related to transport
National Bureau of Statistics	Maintains data and statistical database of the country.	Consult	-general demographic statistical data. - Consultation and feedback
Waste Management Corporation (WAMCO)	Waste management across the country	WAMCO will partner with the project on the u-POPs demonstrations and waste management issues	Data on implementation of national waste management policies, regulations and guidelines. Identify gaps for capacity building and training Smooth implementation of pilot project on uPOPs
STELCO	-All matters related to providing electricity/utilities. -Management of potentially PCB containing equipment	STELCO will partner with the project on PCB phase out	-Data on implementation of utilities, regulations and guidelines. -Identify gaps for capacity building and training Smooth implementation of PCB elimination
FENAKA Corporation Ltd;	-All matters related to providing electricity/ utilities -Management of potentially PCB containing equipment	STELCO will partner with the project on PCB phase out	-Data on implementation of utilities, regulations and guidelines. -Identify gaps for capacity building and training - Smooth implementation of PCB elimination
Maldives Association of Construction Industry (MACI)	Interests of the construction industry, and to generate public awareness for these interests both within the government and among the general public.	Consult	Consultation and feedback
Maldives National University (MNU)	-University offers a program in environmental chemistry and waste management and including pollution prevention -research including sampling and testing -research on gender in the sector	MNU will partner with the project on awareness raising and training activities.	-data collection and research including sex disaggregated data. -Consultation and feedback -Development of training materials

BluePeace	NGO providing awareness on waste management and chemicals related issues among the general public.	Will consult on GAP	Smooth implementation of the Gender action Plan
Eco Care	NGO working with WDCs to train on gender, role of women in waste management	Will consult on GAP	Smooth implementation of the Gender action Plan
The Women's Development Committees* (WDCs)	Provide inputs to ensure the engagement and participation of women throughout the project's development as well as its implementation.	Will consult on GAP	Smooth implementation of the Gender action Plan
Parley	Expand recycling and collection points on pilot islands and waste management sites	Will consult on GAP	Increased collection of plastic bottles and less incineration and PCB production
Hope for Women; Voice of Women	Work with EcoCare on development gender sensitive training and capacity building materials for WDCs and awareness campaign	Will consult on GAP	Smooth implementation of the Gender action Plan

Risks and Assumptions*:*

Table 3: Project risk table

Description	Type	I & P	Countermeasures / Management Response	Owner	Status
Climate Risk (short term). The Maldives is especially vulnerable to climate-related hazards such as extreme rainfalls, storm surges, swell waves, droughts, and damaging winds. From a solid waste perspective, the primary climate risk to waste management facilities and dumpsites appears to be related to effects of severe storms, including sea surges that lead to flooding, damaging winds, which can take out the waste to sea.	Environmental	P=2 I= 4	Prior to the selection of project sites (interim PCB and hazardous waste storage sites/facilities), the project will conduct environmental risk assessments, that will assess potential risks that might jeopardize the safe interim storage of hazardous wastes and could result in the immediate pollution of coastal waters. Any supported interim storage facilities/sites will be protected against severe climatic conditions, which is justified to prevent long-term aesthetic effcts on the tourism sector due to floos water wahsing solid waste into the sea, and hazardous chemicals degrading coral reefs.	MoEn	No Change
Climate Risk (long term) For example, climate-related changes can trigger flooding due to sea level rise in the long-term and will have broader implications to the Maldives	Environmental	P=3 I= 4	It is for this reason that there is such urgency in starting to address the sound management of POPs, hazardous chemicals and wastes in the Maldives. Compared to land-rich countries where particular types of wastes can be stored for a longer period of time, in relatively risk safe environments, away from water sources, communities, etc., the situation is different in the Maldives. There is an extreme urgency to remove POPs from the country as otherwise it is likely that ultimately these sources will be all released to the global environment.	MoEn	No Change
Economic incentives perceived too low to adopt and replicate BEP/BAT practices resulting in continued polluting practices. Thus, formal waste sector service providers do not respond to market opportunities with appropriate capacity investment *(Non-SESP)*	Financial/ Operational	P = 2 I = 3	Developing a countries waste and chemicals management towards an integrated waste management requires the existence of apprpriate financial incenttives for the private sector dealing with hazardous waste to implement BAT/BEP. It is unlikely that these BAT/BEP measures will be implemented or replicated if there are no clear financial incentives to do so. It is even more unlikely for municipality dumpsite or tourism resort owners to replicate u-POPs reduction measures ifeconomic benefits from separation, recycling and reuse are not clearly demonstrated. The project will therefore develop a detailed financial and economic inventives study, including cost-benefit analysis and PPP opportunities, to outline most appropriate economic incentives supportive of the revised legislative framework. This will also include training, establishment of at least three private-public partnership to demonstrate implementation feasibility. These case studies will be captured and disseminated to support future replication.	MoEn	No Change
Geographic constraints due to the dispersed nature of	Operational	P = 2	To address this, bulk transport methods will be utilized to reduce transport costs. Rough seas	MoEn	No

islands in the country may cause high logistical and transportation costs and increases the changes of spillage during transport. Seasonal exposure to rough seas could prevent inter-island transport.		I = 2	will be avoided through proper planning. To avoid spillage/accidents during transport and interim storage, training will be provided to all stakeholders involved in the management of chemicals and hazardous wastes.		Change
Change of mandate of instututions and roles during project implementation	Operational	P=2, I=2	Changes in the mandate of involved institutions might occur during project implementation, which might also include changes in staff assisgnments. To minimize the risks in project interruption it is aimedto include high officials in the project steering committee and technical respresentatives in the technical advisory committee, including proper documentation of meeting minutes, discussion points, workplans, roles and responsibilities. This should allow that information is kept and can easiliy be given to newly assigned staff.	MoEn	Change
Lack of political willingness for a consolidated coordination between relevant institutions/ministries and stakeholders involved in chemicals/POPs management *(Non-SESP)*	Political	P = 1 I = 3	A national chemicals coordination mechanism with clear roles and responsibilities among the project's stakeholders will be set-up to ensure a clear communication line and distribution of project assignments. The Project Steering Committee, the Project Technical Advisor Committee (TAC) and the Working Group (1) on Legislative and Poliy will be involved to ensure proper planning, implementation and monitoring. (see also Section VIII Governance and Management Arrangements).	MoEn	No Change
New regulatory instruments (at national and/or provincial level) cannot be adopted within the	Political	P = 2 I = 2	The selection of proper law-making process (i.e. decrees, guidance, standards, etc. embedded in existing regulations); continous support and oversight provided by the project team; the establishment of a legal working group made-up of all relevant stakeholders; and wider stakeholder consultations, will enable the coordinated and speedy development, and review of an improved regulatory framework on chemicals and waste management in-line with the relevant chemicals related multi-lateral environmental agreements (MEAs)	MoEn	No Change
Delay in the implementation of project activities due to co-dependencies with other projecs. *(Non-SESP)*	Regulatory Operational	P = 4 I = 4	Implementation of replication activties of the setting up hazardous waste management at the regional waste facilities depends on the planning and contruction of them under other projects. Because procurement and implementation procedures are lenghty there might be delays with the replication. The Project Steering Committee will therefore ensure continuous communication with dependency projects to ensure mitigation measures are in place to ensure that u-POPs GEB under this project will be reached.	MoEn	No Change
Local conflict (e.g. unwillingness to separate at source or extraction) hampers the implementation of the pilots *(Non-SESP)*	Other	P = 2 I = 3	The project aims to promote separation at source to ensure that hazardous materials are being separted from the municipal waste. This is a pre-condition for cleaner hazardous waste manament at the Regional Waste Management Facilities and preferably at the municipalty level pilot at a dumpsite. However, there might be lack of willingness to do so combined with informal activties of waste separation (e.g. to recover valuabale materials). Therefore, the project will provide targeted training at household level, especially gender-determined occupational and social roles during waste handling, and will set-up a formal waste separation mechanism at Vandhoo, tourism resorts and municipality level.	MoEn	No Change

There could be local community grievenaces in relation to project site selections and interventions (e.g. in terms of environmental and human health concerns) (SESP Risk)	Other	P=2 I=2	During PPG, a lack of ccordination among government and local community about the selection of regional waste management facilities were observed. However, the selection of these sites (4 in total) is not part of this project. Nevertheless, this project will set up selected local training and awareness raising events to ensure that local communites are kept informed and have the opportunity to consult and express potential concerns. The selection of tourism resorts (to phase out low technology incinerators) and u-POPs phase out demonstation at municipality level will occur during project start using an open competition selection procedure.	MoEn	No Change
PCB transport, storage and disposal operation may pose potential health risk of PCB exposures to the workers in power and utilities industry or in communities nearby such industry. This risks releated to (i) potential safety risks to local communities, (ii) potential project risks to community health and safety of chemicals, and (iii) potential release of pollutants to the environment due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts?, and d) potentially adverse impacts to habitats (e.g. modified, natural, and critical habitats) and/or ecosystems and ecosystem services (SESP risk)	Environment	P= 2 I = 2	The project will ensure that a proper PCB management will be developed and put into practice so that PCB waste is properly transported, stored and disposed. An Environmental Impact Assessment (EIA) will be undertaken in regards to the temporary PCB storage facility to ensure that implementation activities do not harm the environment or human health. In addition, a risk assessment prior to the movement/transport of PCB containing wastes from the various islands to a centralized interim storage facility(ies).	MoEn	No Change
The project could have negative adverse impacts on gender equality and/or the situation of women and girls (SESP risks)	Other	I= 3 P= 2	As mentioned in the Gender Assessment and Gender Action Plan (Annex G), women are the main handler of waste separation, transportation and disposal activities at the household level. Through empowerment of the women (e.g. training of trainers) the project will ensure that waste, especially hazardous waste is being separated and treated in an environmentally sound and healthy manner to avoid release of toxic pollutants' to the families. This will ensure that the project will have positive adverse effects on families and communities.	MoEn	No Change

Economic and/or financial analysis:

72. The project will support ESM, taking all practicable steps to ensure that POPs are managed in a way that protect human health and the environment. Regarding the enforcement of the strengthened legislative framework, a feasibility study (see Activity 1.1.1.8.) will determine the introduction (if applicable) of economic instruments, fiscal incentives and tax schemes (e.g. Extended Producer Responsibility [EPR], and Payment for Pollution Prevention [PPP]) in order to reduce the release of POPs and other harmful discharges. This study will include a cost-benefit analysis and public-private partnership (PPP) opportunities to validate which potential economic incentives are applicable for the Maldives and for which chemicals, products and wastes such economic incentives would provide sustainable long-term solutions. Potential economic and financial schemes could the following:

Economic mechanisms

- Guidelines to stimulate eco-friendly enterprises, and the use of non-polluting solutions
- Course of action to develop and propagate an economic set of standards for resorts to operate within environmental norms

Fiscal schemes

- Tax abatements for businesses
- Surcharge on sale for selected materials
- Duties, import tax on selected goods
- Transportation tolls
- Eco-levy on entry and exit visas indexed to reciprocate cost of visas for Maldivian citizens traveling to the designated countries

Financial

- Pay-as-you-go structures for households to stimulate waste disposal
- Pay-as-you-pay structures for businesses to stimulate waste separation and disposal
- Rebates for certain items and services, eco-friendly, waste-management-related
- Discounts on recycled waste
- Reimbursements for recyclables and disposals
- Allowances for separated waste
- Refunds for delivery to waste centers of certain materials

73. Regarding the introduction of Best Available Technology (BAT) and Best Environmental Practice (BEP) for the elimination of PCBs and reduction of u-POPs, the project will ensure under Output 2.2.2. that cost-effective and environmentally sound BAT/BEP will be chosen for the pilot scenarios at regional, tourism and municipality level. The project will advocate studies, assessments and a draft proposal of an EPR or PPP general regulation, and the subsequent development of particular measures for priority products, waste streams and a statutory approval process for these measures.

Stakeholder engagement plan:

74. Effective Stakeholder engagement is one basis for achieving sustainable project implementation. With this regard, a wide range of relevant stakeholders have been consulted during the PPG phase to ensure active project participation and commitment. Various meetings were organized to discuss the project objectives, potential outcomes and outputs to ensure active participation and support. Specific discussions with the Ministry of Defence (MoD) were carried out regarding the import of chemicals and the various means of chemicals and hazardous wastes disposal. Discussions with the Ministry of Health and Agriculture were held on existing guidelines. The Environmental Protection Agency, the regulatory authority and the Waste Management and Pollution Control Department of the Ministry of Environment, which has the mandate to manage the disposal of wastes in the country, have been involved from the very beginning. Relevant stakeholders with gender equality and women's empowerment expertise were consulted by the PPG Gender Consultant for the Gender Analysis and the Gender Action Plan.

75. Annex F, Table 1 summaries the project stakeholders and Table 2 summaries the ratings of the stakeholders' potential impact, influence and importance for effective project implementation.
76. The main project stakeholders include the following:

Institutional Stakeholders

- Ministry of Defence (MoD)
- Maldives National Defence Force (MNDF)
- Maldives Customs Service (MCS)
- Ministry of Environment (MEE)
- Environmental Protection Agency (EPA)
- Maldives Energy Authority (MEA)
- Ministry of Health (MoH)
- Maldives Food and Drug Authority (MFDA)
- Health Protection Agency (HPA)
- National Drug Agency (NDA)
- Ministry of Fisheries and Agriculture (MoFA)
- Ministry of Tourism Arts and Culture
- Ministry of Gender and Family
- Male' City Council
- Maldives Transport Authority
- National Bureau of Statistics
- Local Government Authority
- City Councils, Atoll Councils, and Island Councils
- National Chemical Management Committee (NCMC)
- The Women's Development Committees* (WDCs)
- National Centre for Information Technology (NCIT)
- United Nations Entity for Gender Equality and the Empowerment of Women (UN Women)

Principle Industrial/Private Sector Stakeholders

- Waste Management Corporation (WAMCO)
- Potential PCB Holders/Utility Providers (e.g. STELCO; FENAKA Corporation Ltd; City/island councils)
- Maldives Association of Construction Industry (MACI)
- Maldives Association for Tourism Industry (MATI)
- Local level businesses (eg. small waste haulers, collectors, separators, island community members of the informal waste sector).

Academic Institutions

- Maldives National University (MNU)

Civil Society / Non-Governmental Organizations

- Blue peace* (representing CSOs)
- EcoCare
- Hope for Women
- Parley

General Public/Local Communities

- Wider Population of the Maldives
- Specific local communities in those islands where there will be temporary storage facilities and pilots.

77. Based on the stakeholder consultation, a stakeholder engagement approach (Annex F, Table 2), including areas of work-related influence, effect on project (as rating), role, stakeholder type, engagement approach and tool as well frequency has

been prepared. The expected roles, responsibilities and expected results from each stakeholder engagement have also been identified.

Gender equality and empowering women:

78. During PPG, a Gender Analysis (see Annex G) was conducted and summarizes the international commitments to gender equality which the Maldives became a signatory to or which are useful to understand the national gender situation related to POPs, e.g. the national legal and administrative framework. Baseline data collection was done through stakeholder interviews, site visits and desk study.
79. Based on the outcomes, a gender action plan (see Annex G) has been developed. Main focus will be on component 3 as outlined in output 3.1.3. (paragraph 71.)
80. The gender action plan is in line with the Maldives UNDAF 2016-2020, Outcome 2: By 2020, gender equality is advanced and women are empowered to enjoy equal rights and opportunities in access to social, economic and political opportunities
    - Output 2.1: By 2020, gender-responsive frameworks at national and sub-national levels have strengthened capacities to advance women's rights, gender equality and economic empowerment
    - Output 2.2: By 2020, State institutions, civil society organizations and the private sector are able to participate fully in CEDAW and other gender-relevant inter-governmental processes, monitor and report progress, and domesticate international obligations and commitments into the national policy framework

South-South and Triangular Cooperation (SSTrC):

81. The project will actively seek to transfer the lessons learnt to other countries, especially SIDS nations with similar circumstances. Developing knowledge products from this project is a good opportunity to share experience and information among relevant stakeholders from other SIDS who might faces similar challenges and problems related to POPs and waste management.

Sustainability and Scaling Up:

Innovativeness, sustainability and potential for scaling up

82. The Maldives encounters a serious lack of capacity for the sound management of POPs, hazardous chemicals and hazardous wastes. This challenge requires urgent and immediate solutions, as not only it presents immediate and long-term challenges to the environment and human health, but is also critical to the economic wellbeing of the population, which for a large part (~ 30% GDP) depends on the tourism sector, a sector which expects the environment to be pristine. Pollution by chemicals and waste would not only deteriorate the environment but also jeopardize the country's economy. As the country also faces challenges in terms of rising sea levels, chemicals and waste management has to be addressed in a sustainable manner that prevents POPs and hazardous chemicals and wastes from ultimately entering the Indian Ocean.
83. **Innovation:** The project is innovative from several perspectives: i) Considering the country is extremely land scarce, very low lying (an average height above sea level of 1.8 meters) consists of 1,190 coral islands in 26 atolls spreading over an area of about 750 km on a north-south axis and 120 km on an east-west axis, chemicals and waste management and the transportation of chemicals and waste from island to island is costly and complicated. ii) The issue of PCBs management has never been addressed before in the Maldives.; iii) The project will introduce/incorporate BEP/BAT approaches for POPs, POPs containing wastes and hazardous wastes (in case such approaches are deemed cost effective compared to export) into existing and planned Regional Waste Management Systems. Currently no system for hazardous waste or POPs exists so this is considered innovative within the country context. The Project is also innovative in building subcontracting partnerships with NGOs who will provide financial and technical support directly to the Women's Development Committees for capacity building and training on waste management at the local level.
84. **Sustainability**: The country does not have an existing EPR/PPP system, therefore the project will introduce economic instruments and incentives as EPR/PPP that will be applied towards long-term financial sustainability to cover chemicals and waste management costs which lead to a reduction in POPs and other harmful releases. Because the country faces serious threats in terms of climate change and rising sea levels, there is an urgency to remove POPs from the country as otherwise there is a high risk that ultimately these POPs will be released to the global environment. Removing POPs sooner rather than later, and introducing sound practices for chemicals and waste management, including working directly with

local communities and the tourism sector, will prevent POPs and waste from entering the global environment in the long term.

85. **Potential for Scaling up:** The proposed project aims to initially work with the Regional Waste Management System in Vandhoo (World Bank supported Maldives Environmental Management Project (MEMP)) to incorporate aspects related to waste segregation of hazardous waste and interim safeguarding of hazardous waste streams. As a follow-up effort, and once the success of new practices for hazardous waste management (introduction of BEP and BAT) has been proven at Vandhoo, the project will replicate successful practices and experiences in newly (to be established) waste management infrastructures/systems which include the Huvadhu Atoll regional waste management Facility project (funded by GoM and IRENA), Addu Atoll regional waste management facility project (Funded by GoM and IRENA) and the Establishment of Regional Waste Management System in Zone 1 Islands, Haa Alifu, Haa Dhaalu and Shaviyani Atoll (funded by OFID). After this replication of practices it is assumed a tipping point has been reached and sufficient capacity among waste management entities will have been built to warrant that similar practices can be replicated elsewhere. The financing for replication and continued management of POPs and hazardous chemicals and wastes, will be drawn from the EPR/PPP system established by the project. Lessons learned from working with the WDCs will be scaled up through the lessons learned and available training materials to islands not included in the initial pilots.

V. PROJECT MANAGEMENT

Cost efficiency and effectiveness*:*

86. The project is expected to achieve the maximum reduction of POPs with a cost-effective approach, including the following:
    - **Strengthening the long-term national capacity of environmentally sound POPs management through technical assistance and technology transfer**. The project will demonstrate that a) the phase-out of PCBs is feasible without interrupting the national electricity service and b) the reduction of u-POPs is possible through simply separation and recycling activities which could also generate additional income. Training (and development of training materials) will be conducted at several levels, including government, private sector and general public, to ensure a widespread awareness raising activity. The technical and gender pilots will have a training of trainers activities, both at company and community level, to allow that lessons learned are shared among communities.
    - **Supporting the phase-out of PCBs to be ensuring the national commitments under the Stockholm Convention until 2025 and 2028.** The project will ensure the complete phase out of PCBs and PCB-containing equipment with the most cost-effective and environmentally sound disposal technique (most properly export).
    - **Supporting the demonstration of best available techniques (BAT) and best environmental practices (BEP) to minimize u-POPs release in a three step approach.** The project will support the reduction of uPOPs through a three step approach. This include a) the introduction of BAT/BEP to manage hazardous waste at Vandhoo Regional Waste Facility and its later up-scaling to the other three Regional Facilities, b) support selected tourism resorts) to phase out the use of low technology incinerators. Because the project cannot support all tourism islands in the Maldives, a selection process will ensure that at least 20 resorts will separate hazardous waste and will be integrated into the transportation to Vandhoo Island. Selected islands will be strategically selected to ensure that project support covers multiple country locations and sizes or resorts. Such interventions would fit well within the country's objective to make its tourism sector more sustainable. The third (c) demonstration will be at municipality level to demonstrate that a material recovery facility can bring not only environmentally benefits but also economic incentives. These lessons learned shall be supported through the set up of appropriate financial and economic incentives.
    - **Supporting the sustainability of improved integrated** hazardous waste management through enforcement of selected financial and economic incentives. See above.

Project management*:*

87. The Implementing Partner for this project is the Ministry of Environment and Energy (MoEn). The Project Management Unit will be located at MoEn in Male, Maldives.
88. Integrated demonstrations will be implemented at Vandhoo Island, at least 3-5 tourism resorts and at least 3-5 selected municipalities. In order to engage with local stakeholders, communities and project

Agreement on intellectual property rights and use of logo on the project's deliverables and disclosure of information**:** To accord proper acknowledgement to the GEF for providing grant funding, the GEF logo will appear together with the UNDP logo on all promotional materials, other written materials like publications developed by the project, and project hardware. Any citation on publications regarding projects funded by the GEF will also accord proper acknowledgement to the GEF. Information will be disclosed in accordance with relevant policies notably the UNDP Disclosure Policy[1] and the GEF policy on public involvement[2].

[1] See http://www.undp.org/content/undp/en/home/operations/transparency/information_disclosurepolicy/

VI. PROJECT RESULTS FRAMEWORK

Table 4: Project Results Framework

This project will contribute to the following Sustainable Development Goal (s): Direct: SDGs 1, 3, 5, 8, 9 and 12. Indirect. SDGs 6, 13 and 14.					
This project will contribute to the following country outcome included in the UNDAF/Country Programme Document: UNPDF 2016-2020, Outcome Area 4: Environment and Climate Change					
This project will be linked to the following output of the UNDP Strategic Plan: Output 1.3: Solutions developed at national and sub-national levels for sustainable management of natural resources, ecosystem services, chemicals and waste.					
	Objective and Outcome Indicators	**Baseline**	**Mid-term Target**	**End of Project Target**	**Data Collection Methods and Risks/Assumptions**
Project Objective: To reduce the risks of POPs on human health and the environment through strengthening institutional capacity and the policy and regulatory framework for the sound management and disposal of chemicals, POPs and wastes, and developing sustainable systems for the sound collection, labeling, storage, and disposal of hazardous chemicals and waste.	Number of economic instruments and incentives (EPR, PPP- at least 2) to support enforcement of gender friendly and environmentally sound solutions for POPs	No economic instruments exits	1 economic instruments and incentives (EPR, PPP- at least 1) to support enforcement of gender friendly and environmentally sound solutions for POPs	3 economic instruments and incentives (EPR, PPP- at least 2) to support enforcement of gender friendly and environmentally sound solutions for POPs	Data Collection Method: The project will conduct an economic and financial analysis during project implementation start and will review yearly implementation status Assumptions: Economic and financial analysis in line with strengthened regulatory framework and strengthening of national capacity completed during first two years of project implementation
	Sex-disaggregated number of direct project beneficiaries for which the risks of POPs exposure has been reduced (GEF Core Indicator 11)	0 direct project beneficiaries	83,000 direct project beneficiaries (41,500 female and 41,500 male) for which the risks of POPs exposure has been reduced	183,000 direct project beneficiaries (91,500 female and 91,500 male) for which the risks of POPs exposure has been reduced	Data Collection Method: ▪ Direct project beneficiaries are those that will experience a reduction in POPs releases to their living and working (133,000 in male plus 50,000 on other islands) + which include people trained by the project (400) + Gov. Staff trained by the project (100) + those reached by the awareness raising campaign (10,000). Tourists not counted. ▪ Once POPs reductions are being achieved by the project in a certain municipality, the most recent census can provide the number of people in the project area benefiting from the POPs reduction. ▪ Quarterly progress reports (QPRs) sent to the CO will provide information on the number of people trained as well as the number of people that have been reached by the awareness raising campaign

					Assumptions: PCB reductions will start to occur in year 2/3 of the project. U-POPs reduction will start to occur in year 4 of the project
Component/Outcome 1. Strengthening the regulatory and policy framework and institutional and technical capacity for the sound management and disposal of POPs, chemicals and wastes.	Number of government entities (especially involved in CCMS) with increased capacity to assess, plan and implement POPs-free interventions A functional national coordination system is set up with capacity created to plan, implement and monitor POPs-elimination/reduction interventions	The devolution of POPs and chemical responsibilities and the enforcement of chemical regulations from the national level to the municipalities is currently hampered by capacity and technical expertise and technology deficits.	Capacity of 5 government entities – (especially involved in CCMS) increased to improve their capacity to assess, plan, and implement POPs-free interventions	Capacity of at least 10 government entities (especially involved in CCMS) and private sector increased to improve their capacity to assess, plan, and implement POPs-free interventions	Data Collection Method: ▪ Assessment report on the capacity of government entities. ▪ 10 capacity building plans prepared by the project. ▪ Trainings provided to ~ 1000 government staff – training/workshop attendants lists will provide the total number of people trained. ▪ Quarterly progress reports (QPRs) sent to the CO will provide information on the number of entities assessed, plans developed and implemented and staff trained.
					Assumptions: The project will ensure that the current draft chemicals regulation will be finalized and approved.
	Number of national policies and regulatory frameworks for environmentally sound POPs management, elimination or reduction efforts drafted	Legal instruments to regulate import, storage, transport, use and disposal of POPs are lacking or inadequate, while the Waste Management Regulation has not been fully implemented. Accelerating the enactment of laws is slow (e.g. the Chemical Regulation is still being drafted) due to lack of national coordination and political will of involved	At least 2 regulatory pertaining to POPs and SMC one national guideline on integrated waste management and 2 regional guidelines drafted	At least 2regulatory ertaining to POPs and SMC one national guideline on integrated waste management and 2 regional guidelines drafted	Data Collection Method: Assessment report on the needs and gaps for policies, plans, regulations, standards and measures to support formalization of the chemicals and POPs sector. ▪ Copies of the policies, regulations, Ministerial Agreements and guidance documents. ▪ Quarterly progress reports to CO will provide information on the number regulatory measures drafted and approved.
					Risks: The approval and/or adoption of regulatory measures and guidance documents developed by the project is delayed during the project and will hamper the implementation of project activities, in particular formalization efforts.

		stakeholders. Although all POPs, except PCBs, listed under the SC are officially banned in the Maldives it is not tied to any legislative norm and enforcement and proper monitoring procedures.			
Component/ Outcome 2 2. Establish systems for the sound collection, labeling, storage and disposal of hazardous chemicals and wastes.	Volume of PCBs eliminated through the introduction of environmentally sound PCB management, including final disposal	NIP and PPG estimates that 24 metric tons of PCB is stored or used in the Maldives	24 metric tons of PCBs safeguarded	24 metric tons of PCBs finally disposed of	▪ Data Collection Method: PCB screening kits, training/workshop attendants' lists, in combination with training reports will report on the total number of people trained, Quarterly progress reports (QPRs) sent to the CO will provide information on the total number of people trained Assumptions: PCB holders are committed to cooperate in the project to ensure that the country will reach the Stockholm Convention Goal of 2025 and 2028 on PCBs
	Volume/Amount of prevented release of PCDD/F	NIP and PPG estimates that open burning is the highest source of uPOPs release in the country	Release of approximately 5 g-TEQ PCDD/F prevented	Release of approximately 15 g-TEQ PCDD/F prevented	▪ Data Collection Method: Dioxin toolkit (baseline versus interventions), training/workshop attendants lists, in combination with training reports will report on the total number of people trained, Quarterly progress reports (QPRs) sent to the CO will provide information on the total number of people trained Risks: Planning and finalization of regional waste management centers not reached during project implementation. Mitigation is to have additional municipalities to demonstrate u-POPs reduction to ensure that GEB is reached.
	Sex-disaggregated number of jobs created to ensure environmentally sound handling of hazardous waste	To date, there are no jobs directly related to hazardous waste management	At least 100 jobs (20% female, 80% men) created to ensure environmentally	At least 224 jobs (20% female, 80% men) created to ensure environmentally sound handling of	Data Collection Method: Official job offer; Training/workshop attendants lists, in combination with training reports will provide the total number of miners trained, ▪ Quarterly progress reports (QPRs) sent to the CO will provide information on the

			sound handling of hazardous waste	hazardous waste	total number of people trained Assumptions: Pilot demonstration can show the cost benefits from waste separation and recycling activities
Component/ Outcome 3 Monitoring and learning, adaptive feedback, outreach and evaluation	Number of trainings carried out in line with the Gender Action Plan (Annex G)	To date, there are no specific gender actions towards eliminating or reducing POPs.	Training materials develop: 5 trainings carried out.	10 trainings carried out	Data Collection Method: ▪ Training/workshop attendants' lists, in combination with training reports will provide the total number of people trained. Assumptions: Gender focal point appointed in the MoEn (from co-funding) to ensure that gender activities are well-planned and monitored.
	Sex-disaggregated number of people reached through awareness raising events on the human and environmental risks of POPs, and environmentally sound ways to reduce POPs emissions.	To date none of the inhabitants or workers on tourism resorts/dumpsite have been made aware of the dangers of POPs and ways to eliminate or reduce POPs releases.	Awareness raised to 5,000 (2,000 female and 3,000 male) on the human and environmental risks of POPs and to ways to reduce POPs emissions.	Awareness raised to 5,000 (2,000 female and 3,000 male) on the human and environmental risks of POPs and to ways to reduce POPs emissions.	Data Collection Method: ▪ Training/workshop attendants' lists, in combination with training reports will provide the total number of people trained. ▪ Interviews with tourist resorts groups and pilot demonstration site inhabitants. ▪ Reports provided by the entity implementing the awareness raising campaign will provide the total number of people reached by the project's awareness raising campaign. ▪ Quarterly progress reports (QPRs) sent to the CO provides information on the total number of people trained and the number of people of whom awareness has been raised. Assumptions; Number of people trained: 500; No. of Gov. officials trained: 100. It is assumed that all people trained by the project in turn raise awareness of their immediate families which on average consist of 4 people (awareness raised of a total of ~ 2,000 people). In addition, the project will raise awareness of an additional 3,000 people from the general public awareness raising campaign.

	Number of GEF M&E requirements met and adaptive management applied in response to needs and Mid-Term Evaluation findings	0 GEF M&E requirements met by the project.	15 of GEF M&E requirements met and adaptive management applied in response to needs and Mid-term review findings.	34 of GEF M&E requirements met and adaptive management applied in response to needs and Mid-term reviews findings.	Data Collection Method: 1 National Inception Workshop + Report; 3 Island Level Inception Workshops (Tourism, Municipality, Gender) + Reports; 5 PIRs (1 per year); 5 audits (average 1 per year); 10 Project Steering Committee meetings (2 per year); 5 Monitoring missions + Back-to-Office Report (BTOR) (1 per year); 1 mid-term GEF Core Indicators updated; 1 Gender assessment completed (as part of MTE); 1 MTR conducted; 1 GEF Secretariat oversight mission conducted + BTOR; 1 TE GEF Core Indicators updated; 1 TE conducted. Assumptions: The project team and UNDP CO can meet all the GEF M&E requirements and within the time planned
	Number of GEF country project website established; Number of monthly project calls project team participates in on yearly basis; Existence of identified opportunities for communication of project activity results at a global level; Number of quarterly project progress reports elaborated by the project team and submitted to the UNDP Country Office	0 project results, experiences, lessons-learned or best practices are captured, published, and taken up by MoEn website	1 GEF country project webpage established. Country project participated in 12 monthly programme/project calls on a yearly basis. On a quarterly basis, information on project progress (using agreed metrics and templates provided by CO, is submitted to CO (in total 10 reports)	1 GEF country project webpage established. Country project participated in 12 monthly programme/project calls on a yearly basis. On a quarterly basis, information on project progress (using agreed metrics and templates provided by CO, is submitted to CO (in total 20 reports)	Data Collection Method: 1 GEF POP website developed and quarterly updated; Meeting minutes from monthly project calls; Quarterly progress reports; Articles published on websites, papers, etc. and on TV; Maldives GEF project reports and publications or reports/publications in which the project is figured. Assumptions: The project team can meet all reporting and communication requirements on time.

VII. MONITORING AND EVALUATION (M&E) PLAN

The project results as outlined in the project results framework will be monitored annually and evaluated periodically during project implementation to ensure the project effectively achieves these results.

Project-level monitoring and evaluation will be undertaken in compliance with UNDP requirements as outlined in the UNDP POPP and UNDP Evaluation Policy. The UNDP Country Office will work with the relevant project stakeholders to ensure UNDP M&E requirements are met in a timely fashion and to high quality standards. Additional mandatory GEF-specific M&E requirements (as outlined below) will be undertaken in accordance with the GEF M&E policy and other relevant GEF policies[3].

In addition to these mandatory UNDP and GEF M&E requirements, other M&E activities deemed necessary to support project-level adaptive management will be agreed during the Project Inception Workshop and will be detailed in the Inception Report. This will include the exact role of project target groups and other stakeholders in project M&E activities including the GEF Operational Focal Point and national/regional institutes assigned to undertake project monitoring. The GEF Operational Focal Point will strive to ensure consistency in the approach taken to the GEF-specific M&E requirements (notably the GEF Core Indicatorss) across all GEF-financed projects in the country. This could be achieved for example by using one national institute to complete the GEF Core Indicatorss for all GEF-financed projects in the country, including projects supported by other GEF Agencies.[4]

M&E Oversight and monitoring responsibilities:

Project Manager: The Project Manager is responsible for day-to-day project management and regular monitoring of project results and risks, including social and environmental risks. The Project Manager will ensure that all project staff maintains a high level of transparency, responsibility and accountability in M&E and reporting of project results. The Project Manager will inform the Project Steering Committee, the UNDP Country Office and the UNDP-GEF RTA of any delays or difficulties as they arise during implementation so that appropriate support and corrective measures can be adopted.

The Project Manager will develop annual work plans based on the multi-year work plan included in Annex A, including annual output targets to support the efficient implementation of the project. The Project Manager will ensure that the standard UNDP and GEF M&E requirements are fulfilled to the highest quality. This includes, but is not limited to, ensuring the results framework indicators are monitored annually in time for evidence-based reporting in the GEF PIR, and that the monitoring of risks and the various plans/strategies developed to support project implementation (e.g. ESMP, gender action plan, stakeholder engagement plan etc..) occur on a regular basis.

Project Steering Committee: The Project Steering Committee will take corrective action as needed to ensure the project achieves the desired results. The Project Steering Committee will hold project reviews to assess the performance of the project and appraise the Annual Work Plan for the following year. In the project's final year, the Project Steering Committee will hold an end-of-project review to capture lessons learned and discuss opportunities for scaling up and to highlight project results and lessons learned with relevant audiences. This final review meeting will also discuss the findings outlined in the project terminal evaluation report and the management response.

Project Implementing Partner: The Implementing Partner is responsible for providing all required information and data necessary for timely, comprehensive and evidence-based project reporting, including results and financial data, as necessary. The Implementing Partner will strive to ensure project-level M&E is undertaken by national institutes, and is aligned with national systems so that the data used and generated by the project supports national systems.

[3] See https://www.thegef.org/gef/policies_guidelines
[4] See https://www.thegef.org/gef/gef_agencies

UNDP Country Office: The UNDP Country Office will support the Project Manager as needed, including through annual supervision missions. The annual supervision missions will take place according to the schedule outlined in the annual work plan. Supervision mission reports will be circulated to the project team and Project Steering Committee within one month of the mission. The UNDP Country Office will initiate and organize key GEF M&E activities including the annual GEF PIR, the *independent mid-term review* and the independent terminal evaluation. The UNDP Country Office will also ensure that the standard UNDP and GEF M&E requirements are fulfilled to the highest quality.

The UNDP Country Office is responsible for complying with all UNDP project-level M&E requirements as outlined in the UNDP POPP. This includes ensuring the UNDP Quality Assurance Assessment during implementation is undertaken annually; that annual targets at the output level are developed, and monitored and reported using UNDP corporate systems; the regular updating of the ATLAS risk log; and, the updating of the UNDP gender marker on an annual basis based on gender mainstreaming progress reported in the GEF PIR and the UNDP ROAR. Any quality concerns flagged during these M&E activities (e.g. annual GEF PIR quality assessment ratings) must be addressed by the UNDP Country Office and the Project Manager.

The UNDP Country Office will retain all M&E records for this project for up to seven years after project financial closure to support ex-post evaluations undertaken by the UNDP Independent Evaluation Office (IEO) and/or the GEF Independent Evaluation Office (IEO).

UNDP-GEF Unit: Additional M&E and implementation quality assurance and troubleshooting support will be provided by the UNDP-GEF Regional Technical Advisor and the UNDP-GEF Directorate as needed.

Audit: The project will be audited as per UNDP Financial Regulations and Rules and applicable audit policies on NIM implemented projects.[5]

Additional GEF monitoring and reporting requirements:

Inception Workshop and Report: A project inception workshop will be held within two months after the project document has been signed by all relevant parties to, amongst others:
a) Re-orient project stakeholders to the project strategy and discuss any changes in the overall context that influence project strategy and implementation;
b) Discuss the roles and responsibilities of the project team, including reporting and communication lines and conflict resolution mechanisms;
c) Review the results framework and finalize the indicators, means of verification and monitoring plan;
d) Discuss reporting, monitoring and evaluation roles and responsibilities and finalize the M&E budget; identify national/regional institutes to be involved in project-level M&E; discuss the role of the GEF OFP in M&E;
e) Update and review responsibilities for monitoring the various project plans and strategies, and related budgets, including the risk log, SESP, Environmental and Social Management Plan (ESMP)- after its completion early during project implementation- and other safeguard requirements; project grievance mechanisms; the gender strategy; the knowledge management strategy, and other relevant strategies;
f) Review financial reporting procedures and mandatory requirements, and agree on the arrangements for the annual audit; and
g) Plan and schedule Project Steering Committee meetings and finalize the first year annual work plan.

The Project Manager will prepare the inception report no later than one month after the inception workshop. The inception report will be cleared by the UNDP Country Office and the UNDP-GEF Regional Technical Adviser, and will be approved by the Project Steering Committee.

[5] See guidance here: https://info.undp.org/global/popp/frm/pages/financial-management-and-execution-modalities.aspx

Environmental and Social Management Plan (ESMP): The SESP pre-screening carried out during the preparation of the PIF rated this project at High Risk. This triggers the need for an ESMP ahead of execution of core activities, since PPG funds only permitted the successful completion of the SESP, Gender Action Plan (GAP) and the Stakeholder Engagement Plan (SEP). Therefore, an Environment and Social Impact Assessment (ESIA) will be undertaken during the first stages of project implementation to assess the potential impacts of the identified risks, and inform the development of the ESMP. The ESMP will outlay specific safeguards plans and guidance to manage the identified risks, and update the GAP and SEP. The ESIA/ESMP process will involve close stakeholder involvement and final results will be vetted by the Project Steering Committee.

GEF Project Implementation Report (PIR): The Project Manager, the UNDP Country Office, and the UNDP-GEF Regional Technical Advisor will provide objective input to the annual GEF PIR covering the reporting period July (previous year) to June (current year) for each year of project implementation. The Project Manager will ensure that the indicators included in the project results framework are monitored annually in advance of the PIR submission deadline so that progress can be reported in the PIR. Any environmental and social risks and related management plans will be monitored regularly, and progress will be reported in the PIR.

The PIR submitted to the GEF will be shared with the Project Steering Committee. The UNDP Country Office will coordinate the input of the GEF Operational Focal Point and other stakeholders to the PIR as appropriate. The quality rating of the previous year's PIR will be used to inform the preparation of the subsequent PIR.

Lessons learned and knowledge generation: Results from the project will be disseminated within and beyond the project intervention area through existing information sharing networks and forums. The project will identify and participate, as relevant and appropriate, in scientific, policy-based and/or any other networks, which may be of benefit to the project. The project will identify, analyse and share lessons learned that might be beneficial to the design and implementation of similar projects and disseminate these lessons widely. There will be continuous information exchange between this project and other projects of similar focus in the same country, region and globally.

GEF Focal Area Core Indicators: The following GEF Core Indicators(s) will be used to monitor global environmental benefits:
The baseline/CEO Endorsement GEF Focal Area Core Indicators(s) – submitted as Annex B to this project document – will be updated by the Project Manager/Team (not the evaluation consultants hired to undertake the MTR or the TE) (indicate other project partner, if agreed) and shared with the mid-term review consultants and terminal evaluation consultants before the required *review/*evaluation missions take place. The updated GEF Core Indicators(s) will be submitted to the GEF along with the completed Mid-term Review report and Terminal Evaluation report.

Independent Mid-term Review (MTR): An independent mid-term review process will begin after the second PIR has been submitted to the GEF, and the MTR report will be submitted to the GEF in the same year as the 3rd PIR. The MTR findings and responses outlined in the management response will be incorporated as recommendations for enhanced implementation during the final half of the project's duration. The terms of reference, the review process and the MTR report will follow the standard templates and guidance prepared by the UNDP IEO for GEF-financed projects available on the UNDP Evaluation Resource Center (ERC). As noted in this guidance, the evaluation will be 'independent, impartial and rigorous'. The consultants that will be hired to undertake the assignment will be independent from organizations that were involved in designing, executing or advising on the project to be evaluated. The GEF Operational Focal Point and other stakeholders will be involved and consulted during the terminal evaluation process. Additional quality assurance support is available from the UNDP-GEF Directorate. The final MTR report will be available in English and will be cleared by the UNDP Country Office and the UNDP-GEF Regional Technical Adviser, and approved by the Project Steering Committee.

Terminal Evaluation (TE): An independent terminal evaluation (TE) will take place upon completion of all major project outputs and activities. The terminal evaluation process will begin three months before operational closure of the project allowing the evaluation mission to proceed while the project team is still in place, yet ensuring the project is close enough to completion for the evaluation team to reach conclusions on key aspects such as project sustainability. The Project Manager will remain on contract until the TE report and management response have been finalized. The terms of reference, the evaluation process and the final TE report will follow the standard templates and guidance prepared by the UNDP IEO for GEF-financed projects available on the UNDP Evaluation Resource Center. As noted in this guidance, the evaluation will be 'independent, impartial and rigorous'. The consultants that will be hired to undertake the assignment will be independent from organizations that were involved in designing, executing or advising on the project to be evaluated. The GEF Operational Focal Point and other stakeholders will be involved and consulted during the terminal evaluation process. Additional quality assurance support is available from the UNDP-GEF Directorate. The final TE report will be cleared by the UNDP Country Office and the UNDP-GEF Regional Technical Adviser, and will be approved by the Project Steering Committee. The TE report will be publically available in English on the UNDP ERC.

The UNDP Country Office will include the planned project terminal evaluation in the UNDP Country Office evaluation plan, and will upload the final terminal evaluation report in English and the corresponding management response to the UNDP Evaluation Resource Centre (ERC). Once uploaded to the ERC, the UNDP IEO will undertake a quality assessment and validate the findings and ratings in the TE report, and rate the quality of the TE report. The UNDP IEO assessment report will be sent to the GEF IEO along with the project terminal evaluation report.

Final Report: The project's terminal PIR along with the terminal evaluation (TE) report and corresponding management response will serve as the final project report package. The final project report package shall be discussed with the Project Steering Committee during an end-of-project review meeting to discuss lesson learned and opportunities for scaling up.

Mandatory GEF M&E Requirements and M&E Budget:

Table 5: GEF M&E Requirements and M&E budget

GEF M&E requirements	Primary responsibility	Indicative costs to be charged to the Project Budget[6] (US$)		Time frame
		GEF grant	Co-financing	
Inception Workshop	UNDP Country Office	USD 5,000	*20,000*	Within two months of project document signature
Inception Report	National Project Manager	None	None	Within two weeks of inception workshop
Standard UNDP monitoring and reporting requirements as outlined in the UNDP POPP	UNDP Country Office	None	None	Quarterly, annually
Monitoring of indicators in project results framework	National Project Manager	USD 5,000 (USD 5,000/year)	*USD 60,000*	Annually
GEF Project Implementation Report (PIR)	National Project Manager and UNDP Country Office and UNDP-GEF team	None	None	Annually
NIM Audit as per UNDP audit policies	UNDP Country Office	USD 15,000	*USD 60,000*	Annually or other frequency as per UNDP Audit policies
Lessons learned and knowledge generation	National Project Manager	*9,000*	*20,000*	Annually
Monitoring of environmental and social risks, and corresponding management plans as relevant	Project Manager UNDP CO	*None*	None	On-going
Project Steering Committee meetings	Project Steering Committee UNDP Country Office National Project Manager	*25,000*	*60,000*	At minimum annually
Supervision missions	UNDP Country Office	None[7]	None	Annually

[6] Excluding project team staff time and UNDP staff time and travel expenses.

Oversight missions	UNDP-GEF team	None	None	Troubleshooting as needed
Visits to field sites	National Project Manager	USD 40,000	*USD 145,000*	At least once annually or as deemed necessary
Knowledge management as outlined in Outcome 3	National Project Manager	*5,000*	*20,000*	*On-going*
GEF Secretariat learning missions/site visits	UNDP Country Office and Project Manager and UNDP-GEF team	None	None	To be determined.
Mid-term GEF Core Indicators to be updated by National Project Manager	*Project Manager*	None	None	*Before mid-term review mission takes place.*
Independent Mid-term Review (MTR) and management response	*UNDP Country Office and Project team and UNDP-GEF team*	*USD 21,000*	USD 120,000	*Between 2nd and 3rd PIR.*
Terminal GEF Core Indicators to be updated by National Project Manager	Project Manager	None	None	Before terminal evaluation mission takes place
Independent Terminal Evaluation (TE) included in UNDP evaluation plan, and management response	UNDP Country Office and Project team and UNDP-GEF team	USD 35,000	USD 215,000	At least three months before operational closure
TOTAL indicative COST (excluding gender) Excluding project team staff time, and UNDP staff and travel expenses		*USD 180,000*	*USD 720,000*	

[7] The costs of UNDP Country Office and UNDP-GEF Unit's participation and time are charged to the GEF Agency Fee.

VIII. GOVERNANCE AND MANAGEMENT ARRANGEMENTS

Roles and responsibilities of the project's governance mechanism: The project will be implemented following UNDP's national implementation modality, according to the Standard Basic Assistance Agreement between UNDP and the Government of Maldives, and the Country Programme.

The **Implementing Partner** for this project is the Ministry of Environment (MoEn).
The Implementing Partner is responsible and accountable for managing this project, including the monitoring and evaluation of project interventions, achieving project outcomes, and for the effective use of UNDP resources.

The Implementing Partner is responsible for:

- Approving and signing the multiyear workplan;
- Approving and signing the combined delivery report at the end of the year; and,
- Signing the financial report or the funding authorization and certificate of expenditures.

The project organisation structure is as follows:

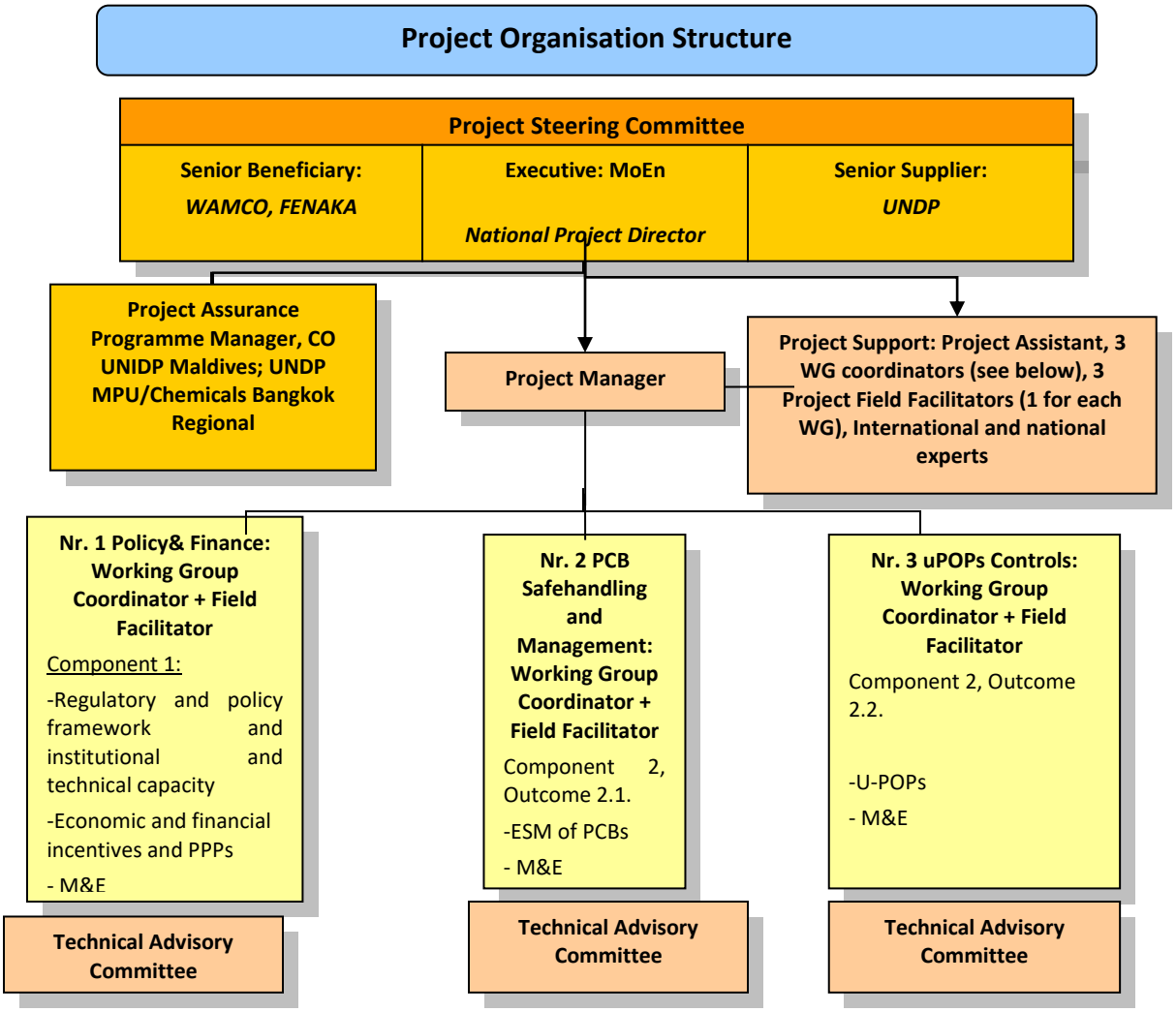


Figure 4: Project Management Structure

Project Steering CommitteeSteering Committee: The Project Steering CommitteeProject Steering Committee is responsible for making by consensus, management decisions when guidance is required by the Project Manager, including recommendations for UNDP/Implementing Partner approval of project plans and revisions, and addressing any project level grievances. In order to ensure UNDP's ultimate accountability, Project Steering Committee decisions should be made in accordance with standards that shall ensure management for development results, best value money, fairness, integrity, transparency and effective international competition. In case a consensus cannot be reached within the Board, final decision shall rest with the UNDP Programme Manager.

The composition of the Project Steering Committee is made up of representatives from the following institutions:

1. Ministry of Environment
2. Ministry of Health
3. Ministry of Fisheries, Marine Resources and Agriculture
4. Maldives Customs Service
5. Environment Protection Agency
6. Ministry of Tourism
7. Ministry of National Planning and Infrastructure (MNPI)
8. Ministry of Defense
9. Maldives National Defense Force (MNDF) Fire and Rescue Service
10. Local Government Authority

Specific responsibilities of the Project Steering Committee include:

- Provide overall guidance and direction to the project, ensuring it remains within any specified constraints;
- Address project issues as raised by the project manager;
- Provide guidance on new project risks, and agree on possible countermeasures and management actions to address specific risks;
- Agree on project manager's tolerances as required;
- Review the project progress, and provide direction and recommendations to ensure that the agreed deliverables are produced satisfactorily according to plans;
- Appraise the annual project implementation report, including the quality assessment rating report; make recommendations for the workplan;
- Provide ad hoc direction and advice for exceptional situations when the project manager's tolerances are exceeded; and
- Assess and decide to proceed on project changes through appropriate revisions.

The Project Steering Committee must include the following roles:

Executive: The Executive is an individual who represents ownership of the project who will chair the Project Steering Committee. This role can be held by a representative from the Government Cooperating Agency or UNDP. The Executive is: The National Project Director (NPD), of the Ministry of Environment, Department of Environment.

The Executive is ultimately responsible for the project, supported by the Senior Beneficiary and Senior Supplier. The Executive's role is to ensure that the project is focused throughout its life cycle on achieving its objectives and delivering outputs that will contribute to higher level outcomes. The executive has to ensure that the project gives value for money, ensuring cost-conscious approach to the project, balancing the demands of beneficiary and suppler.

Specific Responsibilities: (as part of the above responsibilities for the Project Steering Committee)

- Ensure that there is a coherent project organization structure and logical set of plans;
- Set tolerances in the AWP and other plans as required for the Project Manager;
- Monitor and control the progress of the project at a strategic level;

- Ensure that risks are being tracked and mitigated as effectively as possible;
- Brief relevant stakeholders about project progress;
- Organize and chair Project Steering Committee meetings.

Senior Supplier: The Senior Supplier is an individual or group representing the interests of the parties concerned which provide funding and/or technical expertise to the project (designing, developing, facilitating, procuring, implementing). The Senior Supplier's primary function within the Board is to provide guidance regarding the technical feasibility of the project. The Senior Supplier role must have the authority to commit or acquire supplier resources required. If necessary, more than one person may be required for this role. Typically, the implementing partner, UNDP and/or donor(s) would be represented under this role. The Senior Suppler is: UNDP.

Specific Responsibilities (as part of the above responsibilities for the Project Steering Committee)

- Make sure that progress towards the outputs remains consistent from the supplier perspective;
- Promote and maintain focus on the expected project output(s) from the point of view of supplier management;
- Ensure that the supplier resources required for the project are made available;
- Contribute supplier opinions on Project Steering Committee decisions on whether to implement recommendations on proposed changes;
- Arbitrate on, and ensure resolution of, any supplier priority or resource conflicts.

Senior Beneficiary: The Senior Beneficiary is an individual or group of individuals representing the interests of those who will ultimately benefit from the project. The Senior Beneficiary's primary function within the Board is to ensure the realization of project results from the perspective of project beneficiaries. The Senior Beneficiary role is held by a representative of the government or civil society.

The Senior Beneficiary is responsible for validating the needs and for monitoring that the solution will meet those needs within the constraints of the project. The Senior Beneficiary role monitors progress against targets and quality criteria. This role may require more than one person to cover all the beneficiary interests. For the sake of effectiveness, the role should not be split between too many people. The Senior Beneficiary is: MoEn.

Specific Responsibilities (as part of the above responsibilities for the Project Steering Committee)

- Prioritize and contribute beneficiaries' opinions on Project Steering Committee decisions on whether to implement recommendations on proposed changes;
- Specification of the Beneficiary's needs is accurate, complete and unambiguous;
- Implementation of activities at all stages is monitored to ensure that they will meet the beneficiary's needs and are progressing towards that target;
- Impact of potential changes is evaluated from the beneficiary point of view;
- Risks to the beneficiaries are frequently monitored.

Technical Advisory Committee (TAC): The TAC will provide technical advice and inputs relating to project implementation and will be chaired by the Project Director (MoEn, Environment) ith support from the Project Manager. The members of the TAC will consist of representatives from Government Ministries, UNDP, other relevant government agencies, research and educational organizations, NGOs, technical experts and other relevant stakeholders to be agreed by the Project Steering Committee. A preliminary TAC list has been provided below (no order of priority):

- Maldives National Defense Force (MNDF)
- Ministry of Defense (MoD)
- Ministry of Environment- Environment Department/ Chemicals Unit
- Ministry of Environment-Energy Department
- Ministry of Environment-Waste and Pollution Control Department

- Ministry of Housing and Infrastructure
- Ministry of Tourism
- Maldives Association of Tourism Industry
- Ministry of Fisheries and Agriculture (MoFA)- Agriculture section
- Ministry of Gender
- Ministry of Health (MoH)
- Local Government Authority
- Male' City Council
- Maldives Transport Authority
- Environmental Protection Agency (EPA)- Waste Unit
- Maldives National Defense Force (MNDF)- Fire and Rescue
- Maldives Association of Construction Industry (MACI)
- Maldives Customs Service
- Maldives Energy Authority (MEA)
- Maldives Food and Drug Authority (MFDA)
- National Drug Agency (NDA)
- National Bureau of Statistics
- Waste Management Corporation (WAMCO)
- FENAKA
- Hope for Women
- Blue peace
- Eco Care
- UN Women

Technical experts may be invited in to discuss specific issues. Draft Terms of Reference for the TAC can be found in Annex D. These will be reviewed by the Project Steering Committee during project inception and may be extended as necessary.

Project Manager: The Project Manager has the authority to run the project on a day-to-day basis on behalf of the Project Steering Committee within the constraints laid down by the Board. The Project Manager is responsible for day-to-day management and decision-making for the project. The Project Manager's prime responsibility is to ensure that the project produces the results specified in the project document, to the required standard of quality and within the specified constraints of time and cost.

The Implementing Partner appoints the Project Manager, who should be different from the Implementing Partner's representative in the Project Steering Committee.

Specific responsibilities include:

- Provide direction and guidance to project team(s)/ responsible party (ies);
- Liaise with the Project Steering Committee to assure the overall direction and integrity of the project;
- Identify and obtain any support and advice required for the management, planning and control of the project;
- Responsible for project administration;
- Plan the activities of the project and monitor progress against the project results framework and the approved annual workplan;

- Mobilize personnel, goods and services, training and micro-capital grants to initiative activities, including drafting terms of reference and work specifications, and overseeing all contractors' work;
- Monitor events as determined in the project monitoring schedule plan/timetable, and update the plan as required;
- Manage requests for the provision of financial resources by UNDP, through advance of funds, direct payments or reimbursement using the fund authorization and certificate of expenditures;
- Monitor financial resources and accounting to ensure the accuracy and reliability of financial reports;
- Be responsible for preparing and submitting financial reports to UNDP on a quarterly basis;
- Manage and monitor the project risks initially identified and submit new risks to the Project Steering Committee for consideration and decision on possible actions if required; update the status of these risks by maintaining the project risks log;
- Capture lessons learned during project implementation;
- Prepare the annual workplan for the following year; and update the Atlas Project Management module if external access is made available.
- Prepare the GEF PIR and submit the final report to the Project Steering Committee;
- Based on the GEF PIR and the Project Steering Committee review, prepare the AWP for the following year.
- Ensure the mid-term review process is undertaken as per the UNDP guidance, and submit the final MTR report to the Project Steering Committee.
- Identify follow-on actions and submit them for consideration to the Project Steering Committee;
- Ensure the terminal evaluation process is undertaken as per the UNDP guidance, and submit the final TE report to the Project Steering Committee;

As reflected in Figure 4, the Project Manager (PM) will be supported by Administrative staff (30%) and three (3) Working Group Coordinators (WGCs). Each Working Group Coordinator will be responsible for overseeing execution of the activities assigned to their particular working groups and ensuring that they are executed according to the project results framework and activity schedule, and employing the safety guidelines and standards embodied in the Environment and Social Management Plan that is to be developed for the project. The envisioned working groups are:- Working Gp 1 : Policy & Finance; Working Gp 2: PCB Safe Handling & Management; Working Gp 3: uPOPs Controls. The detailed TORs of the working groups will be elaborated at the start of implementation with inputs from the ESIA /ESMP process, the TORs ultimately being vetted by the Project Steering Committee.

The WGs ensure coordination among the stakeholders and are an opportunity to represent the voice of stakeholders on topics such as mercury use in ASGM and the implementation of project activities in line with the agreed project plan and approach. In addition, the Working Group Coordinators (WGCs) will also be responsible for the implementation of all project activities assigned to national consultants within their respective project component.

Project Assurance: UNDP provides a three – tier supervision, oversight and quality assurance role – funded by the GEF agency fee – involving UNDP staff in Country Offices and at regional and headquarters levels. Project Assurance must be totally independent of the Project Management function. The quality assurance role supports the Project Steering Committee and Project Management Unit by carrying out objective and independent project oversight and monitoring functions. This role ensures appropriate project management milestones are managed and completed. The Project Steering Committee cannot delegate any of its quality assurance responsibilities to the Project Manager. This project oversight and quality assurance role is covered by the GEF Agency.

<u>Governance role for project target groups</u>:

In order to engage with project target groups (tourism, municipalities, communities) in decision making for the project, yearly Regional Project Advisory Boards will be organized for each of the pilot projects. The Regional Project Advisory Boards will be called upon by the local government in the respective municipality, and will comprise of representatives from local government, WAMCO (or formal waste handler), community

representatives, as well as non-governmental and community groups active in waste management, including women´s groups. The Project Manager or another representative of the project (WG Coordinator) will attend such meetings and will report on the outcomes of the yearly Regional Project Advisory Boards to the National Project Steering Committee so that points raised during Regional Project Advisory Boards meetings can be considered in the National Project Steering Committee meetings for decision making.

IX. FINANCIAL PLANNING AND MANAGEMENT

The total cost of the project is US$ US$ 63,091,076.71. This is financed through a GEF grant of US$ 3,675,000, cash co-financing of US$ 65,000 and US$ 59,351,076.71 in parallel co-financing. UNDP, as the GEF Implementing Agency, is responsible for the execution of the GEF resources and the cash co-financing transferred to UNDP bank account only.

Parallel co-financing: The actual realization of project co-financing will be monitored during the mid-term review and terminal evaluation process and will be reported to the GEF. The planned parallel co-financing will be used as follows (Table 6)

Table 6: Co-financing

Co-financing source	Co-financing type	Co-financing amount (U$)	Planned Activities/Outputs	Risks	Risk Mitigation Measures
UNDP	In-cash	65,000	Support the implementation of project activities and its management according to the budget and workplan proposed to the GEF.	UNDP CO budget allocation change. Low risk since the resources belong to the UNDP budget.	The UNDP CO will monitor the Ministry's co-financing contribution to the project.
Private Sector- PCB holders FENAKA Corporation	In-kind	264,400	Support the implementation of PCB-project activities (legislation, training, guidance development, staff and time support with PCB transportation to interim facility, final disposal selection and implementation support)	This private sector has been involved and committed during PIF and PPG.	STELCO will support the project activities related to PCBs. The UNDP CO will monitor the Ministry's co-financing contribution to the project.
Waste Management Corporations Ltd.	In-kind	1,209,403.75	Support the implementation of waste management and especially u-POPs pilot activities (legislation, training, guidance development, BAT/BEP implementation	This private sector has been involved and committed during PIF and PPG.	WAMCO will support project activities related to the u-POPs pilots. The UNDP CO will monitor the Ministry's co-financing contribution to the project.

Government of the Maldives	In-kind	57,877,272.96	In accordance with the NIP, the elimination of PCBs and the reduction of u-POPs. Focus on national level activities (component 1 and 3)	Budget allocation change by the Ministry of Finance. However, this is low risk, because the resources belong to the national budget.	The UNDP CO will monitor the Ministry's co-financing contribution to the project.

UNDP Direct Project Services as requested by Government: The UNDP, as GEF Agency for this project, will provide project management cycle services for the project as defined by the GEF Council. In addition, the Government of Maldives may request UNDP direct services for specific purposes, according to its policies and convenience. The UNDP and Government of Maldives acknowledge and agree that those services are not mandatory, and will be provided only upon Government request. If requested, the services would follow the UNDP policies on the recovery of direct costs. These services (and their costs) are specified in the Letter of Agreement (Annex J). As is determined by the GEF Council requirements, these service costs will be assigned as Project Management Cost and duly identified in the project budget as Direct Project Costs. Eligible Direct Project Costs should not be charged as a flat percentage. They should be calculated on the basis of estimated actual or transaction-based costs and should be charged to the direct project costs account codes: "64397- Services to projects – CO staff" and "74596 - Services to projects GOE for CO".

Budget Revision and Tolerance: As per UNDP requirements outlined in the UNDP POPP, the Project Steering Committee will agree on a budget tolerance level for each plan under the overall annual work plan allowing the project manager to expend up to the tolerance level beyond the approved project budget amount for the year without requiring a revision from the Project Steering Committee. Should the following deviations occur, the Project Manager and UNDP Country Office will seek the approval of the UNDP-GEF team to ensure accurate reporting to the GEF: a) Budget re-allocations among components in the project with amounts involving 10% of the total project grant or more; b) Introduction of new budget items/or components that exceed 5% of original GEF allocation.

Any over expenditure incurred beyond the available GEF grant amount will be absorbed by non-GEF resources (e.g. UNDP TRAC or cash co-financing).

Refund to GEF: Should a refund of unspent funds to the GEF be necessary, this will be managed directly by the UNDP-GEF Unit in New York.

Project Closure: Project closure will be conducted as per UNDP requirements outlined in the UNDP POPP.[8] On an exceptional basis only, a no-cost extension beyond the initial duration of the project will be sought from in-country UNDP colleagues and then the UNDP-GEF Executive Coordinator.

Operational completion: The project will be operationally completed when the last UNDP-financed inputs have been provided and the related activities have been completed. This includes the final clearance of the Terminal Evaluation Report (that will be available in English) and the corresponding management response, and the end-of-

[8] see https://info.undp.org/global/popp/ppm/Pages/Closing-a-Project.aspx

project review Project Steering Committee meeting. The Implementing Partner through a Project Steering Committee decision will notify the UNDP Country Office when operational closure has been completed. At this time, the relevant parties will have already agreed and confirmed in writing on the arrangements for the disposal of any equipment that is still the property of UNDP.

Transfer or disposal of assets: In consultation with the NIM Implementing Partner and other parties of the project, UNDP programme manager (UNDP Resident Representative) is responsible for deciding on the transfer or other disposal of assets. Transfer or disposal of assets is recommended to be reviewed and endorsed by the Project Steering Committee following UNDP rules and regulations. Assets may be transferred to the government for project activities managed by a national institution at any time during the life of a project. In all cases of transfer, a transfer document must be prepared and kept on file[9].

Financial completion: The project will be financially closed when the following conditions have been met: a) The project is operationally completed or has been cancelled; b) The Implementing Partner has reported all financial transactions to UNDP; c) UNDP has closed the accounts for the project; d) UNDP and the Implementing Partner have certified a final Combined Delivery Report (which serves as final budget revision).

The project will be financially completed within 12 months of operational closure or after the date of cancellation. Between operational and financial closure, the implementing partner will identify and settle all financial obligations and prepare a final expenditure report. The UNDP Country Office will send the final signed closure documents including confirmation of final cumulative expenditure and unspent balance to the UNDP-GEF Unit for confirmation before the project will be financially closed in Atlas by the UNDP Country Office.

[9] See https://popp.undp.org/_layouts/15/WopiFrame.aspx?sourcedoc=/UNDP_POPP_DOCUMENT_LIBRARY/Public/PPM_Project%20Management_Closing.docx&action=default.

X. TOTAL BUDGET AND WORK PLAN

Award ID:	00097168
Award Title:	Eliminating POPs through sound management of chemicals
Business Unit:	MDV10
Output ID: PIMS no. 5918	00100995
Implementing Partner (Executing Agency)	Ministry of Environment

Table 7: Total budget

GEF Component/Atlas Activity	(Atlas Implementing Agent)	Fund ID	Donor Name	Atlas Budgetary Account Code	ATLAS Budget Description	Amount Year 1 (USD)	Amount Year 2 (USD)	Amount Year 3 (USD)	Amount Year 4 (USD)	Amount Year 5 (USD)	Total (USD)	See Budget Note:
***OUTCOME 1**: Strengthening the regulatory and policy framework and institutional and technical capacity for the sound management and disposal of POPs, chemicals and wastes*	**Ministry of Environment**	**62000**	**GEF**	71200	International consultants	56,000.00	21,000.00	21,000.00	0.00	0.00	98,000.00	1
				71300	Local Consultants	15,256.90	0.00	0.00	0.00	0.00	15,256.90	2
				71400	Contractual Services - Individ	25,200.00	50,400.00	0.00	0.00	0.00	75,600.00	3
				71600	Travel	10,000.00	10,000.00	10,000.00	0.00	0.00	30,000.00	4
				72100	Contractual Services-Companies	10,000.00	10,000.00	20,000.00	0.00	0.00	40,000.00	5
				72200	Equipment and Furniture	0.00	42,500.00	42,500.00	0.00	0.00	85,000.00	6
				72500	Supplies	1,000.00	1,000.00	1,000.00	0.00	0.00	3,000.00	7
				74200	Audio Visual&Print Prod Costs	5,000.00	5,000.00	6,000.00	0.00	0.00	16,000.00	8
				75700	Training, Workshops and Confer	5,000.00	5,000.00	5,000.00	0.00	0.00	15,000.00	9
					sub-total GEF	**127,456.90**	**144,900.00**	**105,500.00**	**0.00**	**0.00**	**377,856.90**	
					Total Outcome 1	**127,456.90**	**144,900.00**	**105,500.00**	**0.00**	**0.00**	**377,856.90**	
***OUTCOME 2**: Establish systems for the sound collection, labeling, storage and disposal of hazardous chemicals*	**Ministry of Environment**	**62000**	**GEF**	71200	International consultants	50,166.66	64,166.67	64,166.67	35,000.00	35,000.00	248,500.00	10
				71400	Contractual Services - Individ	0.00	100,800.00	100,800.00	0.00	0.00	201,600.00	11

and wastes				71600	Travel	0.00	10,000.00	10,000.00	10,000.00	15,030.00	45,030.00	12
				72100	Contractual Services-Companies	25,000.00	940,000.00	910,000.00	500,000.00	0.00	2,375,000.00	13
				74200	Audio Visual&Print Prod Costs	0.00	0.00	5,000.00	12,500.00	12,500.00	30,000.00	14
				75700	Training, Workshops and Confer	0.00	0.00	10,000.00	10,000.00	10,000.00	30,000.00	15
					sub-total GEF	**75,166.66**	**1,114,966.67**	**1,099,966.67**	**567,500.00**	**72,530.00**	**2,930,130.00**	
					Total Outcome 2	**75,166.66**	**1,114,966.67**	**1,099,966.67**	**567,500.00**	**72,530.00**	**2,930,130.00**	
***OUTCOME 3**: KM and M&E Monitoring and learning, adaptive feedback, outreach and evaluation*	**Ministry of Environment**	**62000**	**GEF**	71200	International consultants	0.00	0.00	21,000.00	0.00	35,000.00	56,000.00	16
				71600	Travel	15,000.00	10,000.00	5,000.00	5,000.00	5,000.00	40,000.00	17
				72100	Contractual Services-Companies	26,250.00	16,250.00	26,250.00	16,250.00	6,120.00	91,120.00	18
				74200	Audio Visual&Print Prod Costs	1,000.00	0.00	1,500.00	0.00	2,500.00	5,000.00	19
					sub-total GEF	**42,250.00**	**26,250.00**	**53,750.00**	**21,250.00**	**48,620.00**	**192,120.00**	
					Total Outcome 3	**42,250.00**	**26,250.00**	**53,750.00**	**21,250.00**	**48,620.00**	**192,120.00**	
***PROJECT MANAGEMENT**: Project Management Unit*	**Ministry of Environment**	**62000**	**GEF**	71400	Contractual Services - Individ	30,000.00	30,000.00	30,000.00	30,000.00	30,000.00	150,000.00	20
				72200	Equipment and Furniture	2,000.00	2,000.00	1,000.00	0.00	0.00	5,000.00	21
				72400	Communic & Audio Visual Equip	2,000.00	1,000.00	1,000.00	1,000.00	0.00	5,000.00	22
				72500	Supplies	2,500.00	1,500.00	1,000.00	0.00	0.00	5,000.00	23
				74596	Services to projects-GOE for CO	9,893.10	0.00	0.00	0.00	0.00	9,893.10	24
					sub-total GEF	**46,393.10**	**34,500.00**	**33,000.00**	**31,000.00**	**30,000.00**	**174,893.10**	
		40000	**UNDP**	71400	Contractual Services - Individ	13,000.00	13,000.00	13,000.00	13,000.00	13,000.00	65,000.00	25
					sub-total UNDP	**13,000.00**	**13,000.00**	**13,000.00**	**13,000.00**	**13,000.00**	**65,000.00**	
					Total Project Management	**59,393.10**	**47,500.00**	**46,000.00**	**44,000.00**	**43,000.00**	**239,893.10**	
					SUB-TOTAL GEF	**291,266.66**	**1,320,616.67**	**1,292,216.67**	**619,750.00**	**151,150.00**	**3,675,000.00**	

				SUB-TOTAL UNDP	**13,000.00**	**13,000.00**	**13,000.00**	**13,000.00**	**13,000.00**	**65,000.00**	
				PROJECT TOTAL	**304,266.66**	**1,333,616.67**	**1,305,216.67**	**632,750.00**	**164,150.00**	**3,740,000.00**	

Budget notes:	**For more details, please refer to Annex C of the project document.**
1	Chief Technical Advisor (CTA) will be responsible for providing overall technical backstopping and management support to the Project. See the full TOR in Annex D for details - **50 of 250 days (USD 35,000) *@USD700/day***
	International Consultant for activity 1.1.1.3. and 1.1.1: Support for "Draft technical documents for the Draft Waste Management Bill to include (1) waste classification standards for hazardous and special wastes; (2) Standards for the storage, treatment and disposal of hazardous and special wastes; (3) the Prohibited and Restricted Substances List (to include tracking of PCBs); (4) Hazardous and Special Waste Management Plan", and for "Support for "Provide draft technical specification documents to support Draft Chemical Standards to include: (1) chemical classification standard; (2) Standards for the storage, transportation, and handling of chemicals." **- 30 days (USD 21,000) *@ USD700/day***
	International Consultant for activity 1.1.1.5.and 1.1.1.6: Support for "National integrated waste management plan (IWMP) drafted addressing reduce, recycle and reuse of waste items; and adapted to selected regional waste management zones" - **30 days (USD 21,000) *@ USD700/day***
	International Consultant for activity 1.1.1.5.and 1.1.1.7: Support for "Guidelines and standards for handling of hazardous chemicals along the life cycle (import, use, handling and data management, storage, transport and disposal), with focus on BAT/ BEP for PCBs and u-POPs developed" - **15 days (USD 10,500) *@ USD700/day***
	International Consultant Support for" Activity 1.2.1.3: Practioner guidelines for the CCMS developed and distributed" **- 15 days (USD 10,500) *@ USD700/day***
2	Economic/financial specialist.Support for "Activity 1.1.1.8. Based on economic/incentives analysis, draft national-wide appropriate financial mechanism to encourage EPR and PPP" **- 63 days (15,256.90) *@ USD242.173/day***
3	Working Group Coordinator for Component 1 - **2 years (USD 25,200/year) *@ USD100/day for 252 days per year***

	Project Field Facilitators. (See Annex A and D for details) - **1 year (USD 25,200) *@ USD100/day for 252 days***
4	Travel related to Component 1
5	Contractual services for training activities. Support for "Activity 1.2.1.3: Practioner guidelines for the CCMS developed and distributed", Activity 1.2.1.4: Officials and staff involved in CCMS are trained on chemical harmonization according to their needs, Activity 1.2.1.2: Relevant staff trained on updated regulatory measures, Activities 1.2.3.1. Relevant staff trained on updated CCMS, Activity 2.1.2.5. Train and equip service providers capable of undertaking packaging, transportation, and residual contamination clean-up for PCB wastes, Support for Activity 1.2.2.1. Technical capacity strengthened for regular national inspections
6	Equipment for CCMS and inspections
7	Office supplies
8	Publication and training materials etc. for component 1
9	Workshops for stakeholder meetings under component 1. **USD 5000/per workshop 3 times**
10	Chief Technical Advisor (CTA) will be responsible for providing overall technical backstopping and management support to the Project. See the full TOR in Annex D for details **- 200 of 250 days (USD 35,000/year) *@ USD700/day***
	International Consultant for activity 2.2.1.1. Support for "Activity 2.2.1.1. Conduct in-depth national-wide inventory of municipal waste-related sources of PCDD/PCDF and specific for the regional waste facilities". **- 20 days (USD 14,000) *@ USD700/day***
	International Consultant for Activity 2.2.1.4. Set-up a collection, segregation and transport system for hazardous waste management to be integrated into the regional waste management facilities. **- 10 days (USD 7,000) *@ USD700/day***

	International consultant for activity 2.2.1.6 and 2.2.1.7. Support for "Activity 2.2.1.6. In close coordination with Outcome 2.1 (interim storage of PCBs), explore possibility of a central or decentralized interim hazardous waste storage facility", "Activity 2.2.1.7. In coordination with Output 2.1.2 "Facilitate the environmentally sound management and disposal of 24 tonnes of phased-out PCB containing equipment and waste abroad" demonstrate (on a one-time basis), the export of hazardous chemicals and wastes (including PCBs)." **- 20 days (USD 14,000) *@ USD700/day***
	International Consultant for Activity 2.1.2.8 to undertake ESIA and develop an ESMP or ESMF as required after the initial assessment. This will link with the EIA and risk assessments under Activity 2.1.2.3 and 2.1.2.4 (respectively). **- 30 days (USD 21,000) *@ USD700/day***
	International consultant for Activity 2.2.2.1, Activity 2.2.2.2. and Activity 2.2.2.3." Technical support for BAT/BEP implementations. **- 75 days (USD 52,500) *USD 700/day***
11	Working Group Coordinator for Component 2 -**2 years (USD 25,200/year) @ USD100/day for 252 days per year**
	Project Field Facilitator for Component 2 (See Annex A and D for details) - **2 years (USD 25,200/year) @ USD100/day for 252 days**
	Working Group Coordinator for Component 3 **- 2 years (USD 25,200/year) *@ USD100/day for 252 days per year***
	Project Field Facilitator for Component 3 (See Annex A and D for details) **- 2 years (USD 25,200/year) *@ USD100/day for 252 days per year***
12	Travel related to Component 2
13	Contractual services for EIA. Support for Activity 2.1.2.3. Undertake an Environmental Impact Assessment for the establishment/refurbishment of a secure storage facility for the temporary storage of phased-out PCB containing equipment, stockpiles and wastes (at one (or two) of the holders sites. **USD 25,000**

	Contractual services for planning and construction of interim PCB storage facilities. Support for "Activity 2.1.2.2. ESM and disposal plan for PCBs developed, including cost-effective disposal options", Activity 2.1.2.4. Undertake a risk assessment prior to the movement/transport of PCB containing wastes from the various islands to a centralized interim storage facility(ies); Activity 2.1.2.6. Transport PCB containing waste to the centralized interim storage facility, Activity 2.1.2.2. At 24 tonnes of PCB-containing equipment and waste removed, retrofilled and/or disposed of (to be exported to a qualified disposal facility). **USD 40,000**
	Contractual services for planning and construction of hazardous waste management set up at Vandhoo (plus 3 sites). Support for "Activity 2.2.2.1. Introduce/incorporate BEP/BAT approaches for POPs, POPs containing wastes and hazardous wastes (in case such approaches are deemed cost effective as compared to export) into existing and planned Regional Waste Management Systems, including guideline development, technical capacity" **USD 900,000**
	Contractual services for waste reduction efforts, increased recycling/reuse and integrating hazardous waste disposal into Vandhoo. Activity 2.2.2.2. Support tourism resorts to phase out the use of low technology incinerators, through waste reduction efforts, increased recycling/reuse, and integrating the management of their residual waste into existing or to be established Regional Waste Management Systems. **USD 260,000**
	Contractual services for the removal, retrofitting, and/or disposal of PCB-containing equipment and waste (to be exported to a qualified disposal facility) under Activity 2.2.27.7 - **USD 150,000**
	Contractual services for planning and construction of u-POPs reduction demonstration at municipality. Activity 2.2.2.3. Introduction of BAT/BEP at selected communities to reduce u-POPs from open burning activities. **USD 1,000,000**
14	Publication and training materials etc. for component 2
15	Workshops for stakeholder meetings under component 1. **USD 5000/per workshop 6 times**
16	International consultant for M&E. Support for "Activity 3.1.4.3. Mid-term and terminal evaluation conducted" **- *80 days (USD 56,000) @ USD700/day***
17	Travel related to development of ESIA/ESMP and M&E
18	Contractual services for awareness raising activities. Support for "Output 3.1.2: Undertake awareness raising targeted at households, chemicals users, industries and decision makers" and its activities. **USD 26,120**

	Contractual services for Implementation of the Gender Action Plan. Output 3.1.3 and its activities. Implementation of Gender Action Plan (GAP) to develop gender expertise, creating awareness raising campaigns and empowering the Women's Development Committees. **USD 65,000**
19	Publication and training materials etc. for component 3
20	Project Manager. The Project Manager (PM), together with the CTA will be responsible for the overall management of the project, including the mobilization of all project inputs, supervision over project staff, consultants and sub-contractors. See Annex D for details. **5 years (USD28,000/year)** ***USD 15,000/year covered in this line***
	Project Assistant. The Project Assistant (PA) will assist the Project Manager (PM) in day- to -day management and oversight of project activities. See Annex D for details. **- 5 years (USD 15,000/year)**
21	Office equipment and furniture for 3 years
22	Communications for 4 years
23	Supplies for 3 years
24	Budget line "Direct Project Costs" (Services to Project) will be utilized to cover the costs of UNDP services on procurement, recruitment, etc. Direct project costs will be charged according to GEF rules on DPCs. Please see Annex J. Direct project cost – GOE, Direct project cost – staff: Direct Project Costs (DPC) are the costs of administrative services (such as those related to human resources, procurement, finance, and other functions) provided by UNDP in relation to the project. Direct project costs will be charged based on the UNDP Universal Pricelist (UPL) or the actual corresponding service cost, in line with GEF rules on DPCs. The amounts indicated here are estimations, however as part of annual project operational planning the Direct Project Costs would be defined, and the amount included in the yearly budgets. The account 64397 can only be used for operational cost per transaction; it is not a flat fee; Total cost: **USD 9,893.10**

25	Project Manager. The Project Manager (PM), together with the CTA will be responsible for the overall management of the project, including the mobilization of all project inputs, supervision over project staff, consultants and sub-contractors. See Annex D for details. **5 years (USD28,000/year)** ***USD 13,000/year covered in this line***

SUMMARY OF FUNDS

	Amount	Amount	Amount	Amount	Amount	Total
	Year1	Year 2	Year 3	Year 4	Year 5	
GEF	291,266.66	1,320,616.67	1,292,216.67	619,750.00	151,150.00	**3,675,000.00**
UNDP (in-cash)	13,000.00	13,000.00	13,000.00	13,000.00	13,000.00	**65,000.00**
Ministry of Environment (In-kind)	11,575,454.60	11,575,454.59	11,575,454.59	11,575,454.59	11,575,454.59	**57,877,272.96**
WAMCO (In-kind)	218,871.60	229,815.18	241,305.94	253,371.24	266,039.79	**1,209,403.75**
Fenaka (In-kind)	52,880.00	52,880.00	52,880.00	52,880.00	52,880.00	**264,400.00**
TOTAL	**12,151,472.86**	**13,191,766.44**	**13,174,857.20**	**12,514,455.83**	**12,058,524.38**	**63,091,076.71**

XI. LEGAL CONTEXT

This project document shall be the instrument referred to as such in Article 1 of the Standard Basic Assistance Agreement between the Government of Maldives and UNDP, signed on 25 January 1978. All references in the SBAA to "Executing Agency" shall be deemed to refer to "Implementing Partner."

This project will be implemented by the Ministry of Environment ("Implementing Partner") in accordance with its financial regulations, rules, practices and procedures only to the extent that they do not contravene the principles of the Financial Regulations and Rules of UNDP. Where the financial governance of an Implementing Partner does not provide the required guidance to ensure best value for money, fairness, integrity, transparency, and effective international competition, the financial governance of UNDP shall apply.

The designations employed and the presentation of material on this map do not imply the expression of any opinion whatsoever on the part of the Secretariat of the United Nations or UNDP concerning the legal status of any country, territory, city or area or its authorities, or concerning the delimitation of its frontiers or boundaries.

XII. RISK MANAGEMENT

Consistent with the Article III of the SBAA *[or the Supplemental Provisions to the Project Document]*, the responsibility for the safety and security of the Implementing Partner and its personnel and property, and of UNDP's property in the Implementing Partner's custody, rests with the Implementing Partner. To this end, the Implementing Partner shall:

a) put in place an appropriate security plan and maintain the security plan, taking into account the security situation in the country where the project is being carried;

b) assume all risks and liabilities related to the Implementing Partner's security, and the full implementation of the security plan.

UNDP reserves the right to verify whether such a plan is in place, and to suggest modifications to the plan when necessary. Failure to maintain and implement an appropriate security plan as required hereunder shall be deemed a breach of the Implementing Partner's obligations under this Project Document.

The Implementing Partner agrees to undertake all reasonable efforts to ensure that no UNDP funds received pursuant to the Project Document are used to provide support to individuals or entities associated with terrorism and that the recipients of any amounts provided by UNDP hereunder do not appear on the list maintained by the Security Council Committee established pursuant to resolution 1267 (1999). The list can be accessed via http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml.

The Implementing Partner acknowledges and agrees that UNDP will not tolerate sexual harassment and sexual exploitation and abuse of anyone by the Implementing Partner, and each of its responsible parties, their respective sub-recipients and other entities involved in Project implementation, either as contractors or subcontractors and their personnel, and any individuals performing services for them under the Project Document.

(a) In the implementation of the activities under this Project Document, the Implementing Partner, and each of its sub-parties referred to above, shall comply with the standards of conduct set forth in the Secretary General's Bulletin ST/SGB/2003/13 of 9 October 2003, concerning "Special measures for protection from sexual exploitation and sexual abuse" ("SEA").

(b) Moreover, and without limitation to the application of other regulations, rules, policies and procedures bearing upon the performance of the activities under this Project Document, in the implementation of activities, the Implementing Partner, and each of its sub-parties referred to above, shall not engage in any form of sexual harassment ("SH"). SH is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

a) In the performance of the activities under this Project Document, the Implementing Partner shall (with respect to its own activities), and shall require from its sub-parties referred to in paragraph 4 (with respect to their activities) that they, have minimum standards and procedures in place, or a plan to develop and/or improve such standards and procedures in order to be able to take effective preventive and investigative action. These should include: policies on sexual harassment and sexual exploitation and abuse; policies on whistleblowing/protection against retaliation; and complaints, disciplinary and investigative mechanisms. In line with this, the Implementing Partner will and will require that such sub-parties will take all appropriate measures to:

i. Prevent its employees, agents or any other persons engaged to perform any services under this Project Document, from engaging in SH or SEA;

ii. Offer employees and associated personnel training on prevention and response to SH and SEA, where the Implementing Partner and its sub-parties referred to in paragraph 4 have not put in place its own training regarding the prevention of SH and SEA, the Implementing Partner and its sub-parties may use the training material available at UNDP;

iii. Report and monitor allegations of SH and SEA of which the Implementing Partner and its sub-parties referred to in paragraph 4 have been informed or have otherwise become aware, and status thereof;

iv. Refer victims/survivors of SH and SEA to safe and confidential victim assistance; and

v. Promptly and confidentially record and investigate any allegations credible enough to warrant an investigation of SH or SEA. The Implementing Partner shall advise UNDP of any such allegations received and investigations being conducted by itself or any of its sub-parties referred to in paragraph 4 with respect to their activities under the Project Document, and shall keep UNDP informed during the investigation by it or any of such sub-parties, to the extent that such notification (i) does not jeopardize the conduct of the investigation, including but not limited to the safety or security of persons, and/or (ii) is not in contravention of any laws applicable to it. Following the investigation, the Implementing Partner shall advise UNDP of any actions taken by it or any of the other entities further to the investigation.

b) The Implementing Partner shall establish that it has complied with the foregoing, to the satisfaction of UNDP, when requested by UNDP or any party acting on its behalf to provide such confirmation. Failure of the Implementing Partner, and each of its sub-parties referred to in paragraph 4, to comply of the foregoing, as determined by UNDP, shall be considered grounds for suspension or termination of the Project.

Social and environmental sustainability will be enhanced through application of the UNDP Social and Environmental Standards (http://www.undp.org/ses) and related Accountability Mechanism (http://www.undp.org/secu-srm).

The Implementing Partner shall: (a) conduct project and programme-related activities in a manner consistent with the UNDP Social and Environmental Standards, (b) implement any management or mitigation plan prepared for the project or programme to comply with such standards, and (c) engage in a constructive and timely manner to address any concerns and complaints raised through the Accountability Mechanism. UNDP will seek to ensure that communities and other project stakeholders are informed of and have access to the Accountability Mechanism.

All signatories to the Project Document shall cooperate in good faith with any exercise to evaluate any programme or project-related commitments or compliance with the UNDP Social and Environmental Standards. This includes providing access to project sites, relevant personnel, information, and documentation.

The Implementing Partner will take appropriate steps to prevent misuse of funds, fraud or corruption, by its officials, consultants, responsible parties, subcontractors and sub-recipients in implementing the project or using UNDP funds. The Implementing Partner will ensure that its financial management, anti-corruption and anti-fraud policies are in place and enforced for all funding received from or through UNDP.

The requirements of the following documents, then in force at the time of signature of the Project Document, apply to the Implementing Partner: (a) UNDP Policy on Fraud and other Corrupt Practices and (b) UNDP Office of Audit and Investigations Investigation Guidelines. The Implementing Partner agrees to the requirements of the above documents, which are an integral part of this Project Document and are available online at www.undp.org.

In the event that an investigation is required, UNDP has the obligation to conduct investigations relating to any aspect of UNDP projects and programmes in accordance with UNDP's regulations, rules, policies and procedures. The Implementing Partner shall provide its full cooperation, including making available personnel, relevant documentation, and granting access to the Implementing Partner's (and its consultants', responsible parties', subcontractors' and sub-recipients') premises, for such purposes at reasonable times and on reasonable conditions as may be required for the purpose of an investigation. Should there be a limitation in meeting this obligation, UNDP shall consult with the Implementing Partner to find a solution.

The signatories to this Project Document will promptly inform one another in case of any incidence of inappropriate use of funds, or credible allegation of fraud or corruption with due confidentiality.

Where the Implementing Partner becomes aware that a UNDP project or activity, in whole or in part, is the focus of investigation for alleged fraud/corruption, the Implementing Partner will inform the UNDP Resident Representative/Head of Office, who will promptly inform UNDP's Office of Audit and Investigations (OAI). The Implementing Partner shall provide regular updates to the head of UNDP in the country and OAI of the status of, and actions relating to, such investigation.

UNDP shall be entitled to a refund from the Implementing Partner of any funds provided that have been used inappropriately, including through fraud or corruption, or otherwise paid other than in accordance with the terms and conditions of the Project Document. Such amount may be deducted by UNDP from any payment due to the Implementing Partner under this or any other agreement. Recovery of such amount by UNDP shall not diminish or curtail the Implementing Partner's obligations under this Project Document.

Where such funds have not been refunded to UNDP, the Implementing Partner agrees that donors to UNDP (including the Government) whose funding is the source, in whole or in part, of the funds for the activities under this Project Document, may seek recourse to the Implementing Partner for the recovery of any funds determined by UNDP to have been used inappropriately, including through fraud or corruption, or otherwise paid other than in accordance with the terms and conditions of the Project Document.

Note: The term "Project Document" as used in this clause shall be deemed to include any relevant subsidiary agreement further to the Project Document, including those with responsible parties, subcontractors and sub-recipients.

Each contract issued by the Implementing Partner in connection with this Project Document shall include a provision representing that no fees, gratuities, rebates, gifts, commissions or other payments, other than those shown in the proposal, have been given, received, or promised in connection with the selection process or in contract execution, and that the recipient of funds from the Implementing Partner shall cooperate with any and all investigations and post-payment audits.

Should UNDP refer to the relevant national authorities for appropriate legal action any alleged wrongdoing relating to the project, the Government will ensure that the relevant national authorities shall actively investigate the same and take appropriate legal action against all individuals found to have participated in the wrongdoing, recover and return any recovered funds to UNDP.

The Implementing Partner shall ensure that all of its obligations set forth under this section entitled "Risk Management" are passed on to each responsible party, subcontractor and sub-recipient and that all the clauses under this section entitled "Risk Management Standard Clauses" are included, *mutatis mutandis*, in all sub-contracts or sub-agreements entered into further to this Project Document.

XIII. MANDATORY ANNEXES

Annex A: Multi Year Work Plan

Note: Annex attached separately

Annex B: GEF Core Indicators

Note: Annex attached separately

Annex C: Overview of Technical Consultancies

Note: Annex attached separately

Annex D: Terms of Reference

Note: Annex attached separately

Annex E: UNDP Social and Environmental Screening Procedure

Note: Annex attached separately

Annex F: Stakeholder Engagement Plan

Note: Annex attached separately

Annex G: Gender Analysis and Action Plan

Note: Annex attached separately

Annex H: UNDP Risk Log

Note: Annex attached separately

Annex I: Results of the capacity assessment of the project implementing partner and HACT micro assessment

Note: Annex attached separately

Annex J: Letter of Agreement (LOA) between UNDP and the Government for the Provision of Support Services

Note: Annex attached separately

Annex K: Assessment of the PCB-related regulatory framework

Note: Annex attached separately

Annex L: Assessment report of the Maldives Centralized Chemical Management System (CCMS)
Note: Annex attached separately

Annex M: Rapid Waste Assessment Report
Note: Annex attached separately

Annex N: Desk review of report of capacity assessment
Note: Annex attached separately

Annex O: STAP & GEFSEC Response
Note: Annex attached separately

Annex P: List of people consulted during project development
Note: Annex attached separately

Annex Q: Co-financing letters
Note: Annex attached separately

Annex R: Project Identification Form (PIF)
Note: Annex attached separately

Annex S: UNDP Project Quality Assurance Report
Note: Annex attached separately

Annex T: Baseline scenario and associated baseline projects
Note: Annex attached separately

Annex U: PCB assessment report
Note: Annex attached separately

Annex V: u-POPs pilots
Note: Annex attached separately

Annex W: Legislative framework assessment for chemicals and waste
Note: Annex attached separately