

# UNDP-GEF MTR Report Audit Trail

To the comments received on (1 November, 21 and 31 December 2021) from the MTR of (Mid-term Review of the UNDP-GEF- Nigeria Project “Environmentally Sound management and Disposal of PCBs in Nigeria” (UNDP Project ID-PIMS 5720)

The following comments were provided in track changes to the draft MTR report; they are referenced by institution (“Author” column) and track change comment number (“#” column):

Author	#	Para No./ comment location	Comment/Feedback on the draft TE report	MTR team response and actions taken
PMU	1.	Title Page	Logo of Project Donors rearranged.	Accepted
PMU	2.	Project Progress Summary Line 2	Please, review rating after considering additional work done, particularly on inventory and location of PCBs centres.	Comment was considered after reviewing the new data/info provided by the project team.
PMU	3.	Project Progress Summary Paragraph 3 Line 1	Pls., update this section, after review of additional information provided by PMU	Comment was considered after reviewing the new data/info provided by the project team.
PMU	4.	Project Progress Summary Paragraph 4 Line 4	With reports of training of inventory field teams, comprising of representatives of power sector operators, Government, NGOs and academia. outcomes 2,3 and 4 have been achieved. 235 people trained, 46 women (more than 20%). Kindly review the reports, Combined Delivery Report (CDR) from UNDP and other evidential records provided by PMU. The training was facilitated by PMU, International Consultant (Inventory) and Lead Technical Support Consultant (Mr. Lupi)	Comment was considered after reviewing the new data/info provided by the project team.

PMU	5.	Table 3 Page 28 Line 3	I think it is necessary to amend this. if we agree that the indicators are linked to measurable targets	Irrelevant. The Project team cannot intervene with the evaluators' rating.
PMU	6.	Table 4. Page 38 MTR Rating Column. Line 3	Please, refer to the workshop reports and update the ranking.	Comment was considered after reviewing the new data/info provided by the project team.
PMU	7.	Work Planning. Table 5 Page 49. AWP Budgets Line 4	Kindly update using CDR from UNDP.	Comment was considered after reviewing the updated CDR shared by UNDP CO
PMU	8.	Finance and Co-Finance Page 50. Paragraph 3 Line 4	Pls update	Comment was considered after reviewing the new data/info provided by the project team.
PMU	9.	Efficiency and Effectiveness Page 59. Paragraph 5 Line 2	Please, refer to my comments on co-financing by Government and TCN, for example. and amend accordingly. Government has provided in-kind support and TCN is committing investment on interim storage facility and inventory update in initial 14 States and FCT	Comment was considered after reviewing the new data/info provided by the project team.
PMU	10	Sustainability Page 59, Paragraph 2 Line 3	Please, refer to my comment above.	Comment was considered after reviewing the new data/info provided by the project team.
PMU	11	Financial risks to Sustainability Page 60, Paragraph 3 Line 3	Pls., refer to my comment on co-financing	Comment was considered after reviewing the new data/info provided by the project team.
PMU	12	Progress Toward Results Page 64, Paragraph 1 Line 2	Pls., amend. This paragh may not be totally descriptive.	Irrelevant comment.
PMU	13	Progress Toward Results Page 65, Paragraph 1. Line 7	Pls., update based on updated CDR	Comment was considered after reviewing the updated CDR shared by UNDP CO
UNDP RO	14	Page 7 – Project Information Table	[5] Total co-financing [2+3+4]: for the column	Corrected.

			'situation at MTR October 2021', the total should be "176,000" and not zero.	
UNDP RO	15	Page 8 line 2	"Regulatory regulations" seems to be a repeat	Corrected
UNDP RO	16	Page 9 : line on Outcome 5	"will achieve all of its mid-term targets by end of the project with minor shortcomings." Should it not be "achieve end of project targets by project closure"? Or mi-term targets achieved at mid-term?	Corrected
UNDP RO	17	Page 11 Recommendation 1	The last sentence seems incomplete (there is no verb). The Log frame should be revised, completed?	Corrected
UNDP RO	18	Page 11 Recommendation 2	The rationale of the recommendation is understood (however, the Project Document has been shared with the main stakeholders already and is available on the UNDP page here: <a href="https://open.undp.org/projects/00105607">https://open.undp.org/projects/00105607</a> ). The request for a one-year extension should be assessed by the implementing partner and the Country Office, and then submitted to the technical team of NCE (RTA and PTA) for possible recommendation to the NCE coordinator. The extension will bear costs of implementation to be taken into account. During the latest PIR (completed in 2021) the IP and the CO indicated to the RTA that	Noted. No action has been taken.

			extension may not be necessary.	
UNDP RO	19	Page 11 Recommendation 3	“The communities around the power plant need to be targeted with awareness because of the leakage of PCB oil that gets into unwholesome use.”. Which power plant is referred to in this recommendation? Or is it a general recommendation? Why focus specifically on communities around power plants as the main source of PCBs may be in other facilities?	The recommendation was based on the site visit done by the NC to the site.
UNDP RO	20	Page 11 Recommendation 4	The need for increased awareness raising is noted, though the PMU is actually developing strong activities in this field. The rationale for focusing on secondary schools is not obvious. Why should this target group be specifically prioritised?	The focus is on young generation and thus, schools would be the best venue to access them.
UNDP RO	21	Page 17 – 1.7. last sentence	It seems a verb is missing in this sentence “Nonetheless, the stakeholders interviewed to give an adequate representation of the standing of the project.” Maybe consider the phrase: “were able to give”?	Rephrased
UNDP RO	22	Page 23	<ul style="list-style-type: none"> <li>• CEMAC</li> <li>• AEDC</li> </ul> <p>These acronyms have not been defined in the MTR and maybe it would be good to mention what they stand for?</p>	<p>AEDC was part of the acronym list.</p> <p>CEMAC full name was added to the list and the report.</p>
UNDP RO	23	Page 23 section 2.5	“The total duration of the MTR will be approximately 40 days over 8 weeks starting July 2021 and shall not exceed 2 months from	Modified

			<p>when the consultant(s) are hired. The tentative MTR timeframe is as follows”</p> <p>This seems extracted from the ToR: should it not be in past tense now that the work of the MTR team is completed?</p>	
UNDP RO	24	Page 27 2d paragraph	It is not obvious how the project contributes to this SDG which the MTR highlights as one that the project does: SDG 15, indicator 15.5, “Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species”.	Mentioned in Pages 24 and 26.
UNDP RO	25	Page 27-28 - 3.1.2 Results Framework/ Log-frame	The criticism of the lack of output is well understood. Can the MTR team specifically explain what the recommendations is? Should the Log Frame be revised accordingly? If it relates to Recommendation 6 on page 13, could this be more explicit on what actions are required in response to the MTR?	The recommendation is made in page 27.
UNDP RO	26	Page 29 Section 3.2.1	We shall request the PMU to update the Tracking Tool so that the MTR team can assess it.	No updated TT was shared with the MTR during the MTR review work.
UNDP RO	27	Page 29 Indicator 1 (Objective)	As per the color code table, this box should be indicated as red, it seems?	No. It should be yellow. Red means will not be achieved by the project closure, which is not the case.
UNDP RO	28	Pp 38 (final para) and 39 (first para)	The awareness raising and training workshops are likely to be held in Q1 of 2022 instead, it seems.	Updated

UNDP RO	29	Page 40, last box	Should it be green as per the color code, considering the assessment?	It is green.
UNDP RO	30	Pp 42-43	Outcome 4: why is the color not yellow, as per the assessment, for the 2 indicators? Nothing indicates both indicators cannot be achieved by end of project, it seems.	No. Both should be in red.  The work under the two indicators did not start yet.
UNDP RO	31	P 45 3.2.2	Suggest: "establishing" rather than "building" storage facilities, since pre-existing facilities may be used and adapted for the planned use.	Noted.
UNDP RO	32	P46 3.3.1	Reporting is to the GEF rather than an internal one to UNDP regional technical team. Suggest correcting the sentence.	Corrected
UNDP RO	33	P 47 (overall)	My understanding is that the Executing entity monitors progress in line with the ProDoc, while UNDP, as GEF agency, ensures the oversight.	Noted.
UNDP RO	34	P48, second to last paragraph	The PSC also met on 9 March 2021, which is not mentioned in the description of its meetings. Suggest adding that meeting.	It is already mentioned in Page 47. The paragraph before the last.
UNDP RO	35	P 48, last paragraph	The Project Coordinator was not hired by UNDP, but was appointed by the Ministry. The PC is not a UNDP employee either, and this position is thus not funded by the GEF funds. Suggest correcting.	Text was modified
UNDP RO	36	P49	Procurement: The international senior technical consultant was hired by UNDP, not the PMU directly. Also, one	Modified

			procurement for the lab equipment of the national laboratory in Abuja was conducted by the CO (could not be completed in 2020).	
UNDP RO	37	Table 5 p 49	I am not sure the "Totals" line means much (last line in the table). All years added, the total is higher than the overall project budget. Of course, having the realized percentage per year does make sense, as is indicated.	Noted but nothing to address. The idea is to show the AWP vs the actual expenditures. Of courses, the total will be higher than the actual budget.
UNDP RO	38	Page 52	I completely agree with the concern regarding the co-financing indicated by the MTR team. I am not sure that letters can be provided for the MTR purposes to confirm co-financing trough. But it seems that the co-financers are not ready to firmly confirm their commitment at this point, which is a major issue for the project (this was also highlighted in the 2021 PIR).	Noted with thanks
UNDP RO	39	Page 52	It is indicated in this draft that no PIR was prepared for 2019 and implies that such a PIR should have been prepared. PIRs are required by the GEF for projects that start before the date of 1 July for the following year's PIR cycle. In UNDP terms, the start of the project is the date of signature of the Project Document. The Project document was signed on <b>27</b> July 2018. No PIR was thus required covering the 2018-2019 period for submission in 2019. While it may have been beneficial to have one,	Although this is correct and it is not mandatory for have a PIR for 2019 taking into consideration that the project started Mid July 2019, yet, it would have been very beneficial to have a PIR for 2019. This is the opinion of the MTR team.

			this is not the decision of the GEF Agency whether a PIR is due or not. The first due date for PIR was 2020, covering the period July 2018 to June 2020. Suggest clarification in the text of the draft MTR.	
UNDP RO	40	Page 53	The Tracking tool should be updated by the project team, I am not sure why it is not available to the MTR team yet.	Nothing was shared.
UNDP RO	41	Page 53	The project closure date of the project is July 2023. Suggest editing the current text.	Corrected.
UNDP RO	42	Page 54, para 3.3.5	There was a description of stakeholder engagement in the Project Document (see specific paragraphs, for ex. Page 28 of the ProDoc), though, as mentioned by the MTR team, this seems not to have been detailed enough to be a meaningful analysis.	The MTR team used different ways to understand the stakeholder engagement, including the projects reports, the interviews with the stakeholders and the project's team. Yet, the details were not enough to enable the MTR team to provide more meaningful analysis.
UNDP RO	43	Page 55, 3.3.6	The PIR is not formally endorsed by the PSC, it is only shared with the PSC members.	This is the situation as stated by the project team.
UNDP RO	44	Page 56	The 2021 PIR also had ratings for IP and DO progress. The final version of the PIR is attached along with these comments.	Noted
UNDP RO	45	Page 56, 3.3.6	The project no longer can use Twitter as a platform, due to the Nigerian Government policy in this regard at the moment.	Noted and the text was modified.
UNDP RO	46	pp. 60-61	The rehabilitation of contaminated sites is indeed	Well noted



			the responsibility of the Government, it is not an objective of the project itself. Only contaminated oil and equipment are targeted by the project.	
UNDP RO	47	p. 63, 3.4.4	While I am glad to see that no major environmental risk is noted in this section, I would draw the attention of the PMU and thus of the MTR team to the High Risk qualification of the project in terms of Social and Environmental Standards as per the UNDP assessment. The SESP and the ESMF that have been completed highlight these potential risks and the necessary mitigation measures.	Noted and the text was updated accordingly.
UNDP RO	48	p. 64 Conclusion #4	Apart from short-term consultants, there is at least one international long-term consultant, to provide specific technical advice to the project.	Noted.
UNDP RO	49	P 67 Recommendation 1	Should Recommendation 1 not list the PMU as well in terms of responsibility / follow up for the revision of the timeline?	Added
UNDP RO	50	P67 Recommendation 2	While this is noted and supported by the COVID-19 situation, it should be noted that such request for extension is decided by UNDP, does not need to be submitted to the GEF for approval. However, all avenues should be explored to avoid or minimize this extension. Additionally, the CO should note that there will be financial costs associated for the CO for	For the CO to follow up on.

			this extension, as per the latest SOP of the Vertical Funds (internal to UNDP).	
UNDP RO	51	pp. 84-85	Noted that documents 12 and 42 (final ESMF) seem to be referring to the same document. Is this not a repeat?	Corrected
UNDP RO	52	Table 5.5	It seems that several people listed in the interviews (5.4) are not listed in this table as people that were interviewed (this is just a remark for consistency – for example, the regional team of UNDP is not mentioned). Also, I suggested that Carlo Lupi would be interviewed as international consultant, but it seems he has not been. It would have been useful, I believe, but is probably too late at this point.	Names were added.