





ELIMINATING POPS THROUGH SOUND MANAGEMENT OF CHEMICALS



MID-TERM REVIEW REPORT

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October 2022

Acknowledgements:

The authors of the Mid-Term Review Report wish to express their appreciation to all project stakeholders whom they have interviewed during the data collection phase for their open views on progress in the project implementation and candid opinions on achievement of the planned targets. The consultants also extend their appreciation to the UNDP Country Office in the Maldives for logistical support and assistance with arranging the on-line interviews. Effective and timely assistance with organisation of the stakeholder interviews and timely provision of all project-related documentation contributed to the smooth conduct and successful completion of the Mid-Term Review.

Abbreviations

AWP	Annual Work Plan
BAT	Best Available Techniques
BEP	Best Environmental Practices
CDR	Combined Delivery Report
CEO	Chief Executive Officer
CCMS	Central Chemical Management System
СО	Country Office
CPD	Country Programme Document
CTA	Chief Technical Advisor
EPA	Environmental Protection Agency
EPR	Extended Producer Responsibility
ERM	Enterprise Risk Management
ESM	Environmentally Sound Management
GAP	Gender Action Plan
GoM	Government of the Maldives
GMEIWMP	Greater Malé Environmental Improvement and Waste Management Project
GEF	Global Environment Facility
HACT	Harmonised Approach to Cash Transfers
HCB	Hexachlorobenzene
HCM	Hazardous Chemical Management
LoA	Letter of Agreement
MCEP	Maldives Clean Environment Project
MEA	Multilateral Environmental Agreement
MECCT	Ministry of Environment, Climate Change and Technology
MoD	Ministry of Defence
MoU	Memorandum of Understanding
MSP	Medium Sized Project
MTR	Mid-Term Review
NGO	Non-governmental Organization
NIM	National Implementation Modality
NIP	National Implementation Plan
PPP	Payment for Pollution Prevention
PSC	Project Steering Committee

PCBs	Polychlorinated biphenyls
PCDD	Polychlorinated dibenzo-p-dioxins
PCDF	Polychlorinated dibenzofurans
PIF	Project Identification Form
PIR	Project Implementation Report
POPs	Persistent Organic Pollutants
PM	Project Manager
PMU	Project Management Unit
PPG	Project Preparation Grant
PSC	Project Steering Committee
RTA	Regional Technical Advisor
RWMC	Regional Waste Management Centre
SC	Stockholm Convention
SESP	Social and Environmental Screening Procedure
SESR	Social and Environmental Screening Report
TOR	Terms of Reference
u-POPs	Unintended Persistent Organic Pollutants
URA	Utility Regulatory Authority
WAMCO	Waste Management Corporation Limited
WG	Working Group

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EXECUTIVE SUMMARY

This report summarizes the findings of the independent Midterm Review (MTR) conducted via virtual meetings between 4 August 2022 and 30 September 2022 for the UNDP-GEF Project *Eliminating POPs through Sound Management of Chemicals* that received a US\$3,675,000 grant from the Global Environment Facility (GEF) in October 2019.

Project Information Table

Project Title	Eliminating POPs throu	1gh Safe Management of Chem	nicals	
UNDP Project ID (PIMS #):	5918	PIF Approval Date:	23 May 2017	
GEF Project ID (PMIS #):	9562	CEO Endorsement Date:	16 October 2019	
Country: The Maldives	The Maldives	ProDoc Signature Date:	6 February 2020	
Region:	Asia Pacific	Date Project Manager hired:	October 2020	
Focal Area:	Chemicals and Waste	Inception Workshop date:	5 November 2020	
GEF Focal Area Strategic Objective:	CW-2 Programme 1 and Programme 3	Midterm Review Date:	August – September 2022	
Trust Fund:	GEF TF	Planned closing date:	31 December 2024	
Executing Agency/ Ministry of Environme		nt, Climate Change and Technology (MECCT)		
Other execution partners:	N.A.			
Project Financing		at CEO endorsement (US\$)	at Midterm Review (US\$)	
[1] GEF financing:		3,675,000	370,147	
[2] UNDP contribution (TRAC))	65,000	0	
[3] Government		57,877,273	25,234,327	
[4] Other partners (private secto	r)	1,473,804	883,326	
[5] Total co-financing [2 + 3+ 4]:	59,351,077	26,117,653	
PROJECT TOTAL COSTS [1 +	- 5]	63,091,077	26,487,800	

Project Description

The general objective of the project is 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. The objective is to be achieved through establishment of sustainable systems for the sound collection, labelling, storage, and disposal of hazardous POPs chemicals and waste as well as introduction of Best Environmental Practices (BEP) and Best Available Techniques (BAT) at the regional/municipality level, and at tourist resorts.

The project was designed to address the following important aspects:

- 1) Increase national POPs management capacities including development and enforcement of legislation: The legislative component of the project was designed to:
- 2) Remove technical capacity barriers for inventory and management of POPs: The technical component was designed to:
- 3) Increase levels of awareness through engagement of stakeholders: The issue of PCBs and u-POPs is typically not a well-known environmental issue. Therefore, there is a need to inform the key stakeholders and the public about the benefits brought by the project so that the Government and other stakeholders are encouraged to undertake necessary actions.

Project Progress Summary

Under Component 1, the project supports strengthening of the regulatory and policy framework and building institutional and technical capacities for sound management and disposal of POPs chemicals and wastes.

The project contributes to upgrading of the baseline legislation in terms of definitions and scope. Under Outcome 1.1, it was recognised that the baseline legislation did not provide definition and detailed classification of hazardous chemicals. Therefore, the original plan to develop subsidiary legislation under the Waste Management Act was changed and a draft Hazardous Chemicals Management Act was prepared following intensive stakeholder consultations and submitted into the legislative process. Moreover, the project produced a report on Inventory of Municipal Waste-related Sources of PCDD/F.

Implementation of Outcome 1.2 contributed to harmonisation of the respective mandates related to hazardous waste management between the two key ministries, namely the Ministry of Environment, Climate Change and Technology (MECCT) and the Ministry of Defence (MOD). Based on signature of a MoU, the project supports upgrading of the electronic portal of the *MAKUDI* Chemical Information System that manages data on the chemicals imported to the country and issues online permits to importers. At MTR, the work on upgrade of the portal was still in progress.

Under Component 2, the project supports establishment of systems for sound collection, labelling, storage and disposal of hazardous chemicals and wastes. Specifically, the project has achieved the mid-term target for Outcome 2.1, namely safeguarding of up to 30 tonnes of PCB-contaminated transformers and switchgears in a temporary storage and has progressed with arrangements for packaging, shipment, and final disposal of the PCB waste at a certified destruction facility abroad.

Under Outcome 2.2, project supported preparation of a feasibility study for establishment of the HWCM system for the regional waste management centre at Thilafushi. This is an important milestone in the hazardous waste management in the country as the study provides a conceptual-level design for the other regional waste management centres that are to be established on the Addu and Vandhoo islands. Moreover, the project prepared a concept paper for administration of a micro-grants scheme on demonstration of the 3R principle in the area of reduction of u-POPs releases.

The main deliverable under Component 3 dedicated to monitoring, adaptive feedback, outreach, and evaluation is the updated Gender Action Plan and related train-the-trainers workshop that contributes to identification of gender issues and strategies for mainstreaming of gender in the chemicals and waste sector and for reduction of exposure to chemicals in the workplace and household. Moreover, the project supported preparation of 10 awareness materials on sound management of chemicals (3 leaflets and 7 posters) that are available for download from the MECCT webpage.

Measure	MTR Rating ¹	Achievement Description
Project Strategy/ Project Formulation	N/A Stakeholder Participation Rating: N.A.	Project design consistent with the Maldives SAP 2019-2023 and with priority areas of the NIP under the Stockholm Convention, It is aligned Programmes 1 and 3 of the GEF-6 Chemicals and Waste Focal Area Definition of the Project Objective, outcomes, and outputs clear.
		practicable and feasible within the project time frame and with majority of indicators and their targets suitable for measurement of progress to achievement of the planned results A few indicators/targets found not in line with the SMART criteria and thus not fit for measuring progress in implementation
Progress Towards	Objective	No progress on development of economic instruments.
Results	Achievement Rating: MU	no data available on assessment of progress on direct beneficiaries affected by the project
	Outcome 1.1 Achievement Rating: S	Draft Hazardous Chemicals Management Act prepared and validated through stakeholder consultations and submitted for legislative approval
		Inventory of Municipal Waste-related Sources of PCDD/F
	Outcome 1.2	Work on upgrade of the on-line MAKUDI portal in progress
	Achievement Rating: MS	Work in progress on development of capacity building programme for regulatory and technical stakeholders
	Outcome 2.1	Up to 30 tonnes of PCB safeguarded at temporary storage
	Achievement Rating: S	Design of the interim HW storage facility completed
		Construction of the interim HW storage facility in progress
		Tender for procurement of services for packaging shipment and ultimate disposal of PCB waste initiated
	Outcome 2.2 Achievement Rating: MS	Feasibility study for establishment of HWCM at Thilafushi completed Concept paper for administration micro-grants scheme for reduction
		and separation of waste streams
	Outcome 3	Updated Gender Action Plan and train-the-trainers workshop
	Achievement Rating: MS	10 public awareness materials posted at the MECCT website
Project	Overall rating: MS	Management arrangements – MS
Implementation &		Work planning – S
Adaptive		Monitoring and evaluation – S
Management		Identification and management of risks – MS
		Finance and co-finance – S
		Stakeholder engagement – MS
		Reporting and communication - MS
Sustainability	Overall rating: ML	Institutional and governance sustainability - L
		Financial sustainability – L
		Socio-economic sustainability - ML
		Environmental sustainability - ML

MTR Ratings & Achievement Summary

¹ MTR rating indices are provided in Annex 6

Concise summary of conclusions

The project is aligned with the Strategic Action Plan (SAP) of the Government of Maldives for 2019-2023 as a central policy framework and planning document that guides the overall development direction of the Maldives for the five-year period. It also links to the Maldives National Implementation Plan (NIP) under the Stockholm Convention on POPs that mentions management of PCB waste and reduction of u-POPs as priority areas. Furthermore, it aligns with relevant programmes the GEF-6 Chemicals and Waste (CW) Focal Area and contributes to Output 2.3 of the UNDP Country Programme in the Maldives for 2022-2026.

The MTR considers the project results framework and definition of the Project Objective and outcomes explicit and clear. A majority of indicators and their related targets are in line with the SMART criteria but a few indicators and/or targets were found not realistic or not specific enough, particularly those at the level of the Project Objective. Therefore, such indicators and/or targets need to be reconsidered in order to set realistic and more specific targets for the remaining timeframe of the project.

The start of the project implementation was impeded by the unprecedented challenge of the COVID-19 pandemic. After the signature of the Project Document by the GoM, a national lockdown that was imposed slowed down key initial actions under the project, in particular recruitment of the PMU staff. Various internal and external factors caused significant delays in the project implementation. Procurement of consultancy services was protracted due to challenges to find qualified technical experts in the Maldives.

The MTR concludes that the project has achieved satisfactory progress in upgrading national legislation and enhancing cooperation between the key actors in POPs waste management. However, the work on drafting of economic instruments and incentives for supporting enforcement of environmentally sound POPs management has not started. Due to complex nature of this issue and lack of in-country experience with it, the duration of the consultative and drafting processes could last well beyond the remaining duration of the project.

The project is on track towards ultimate disposal of the estimated 30 tonnes of the currently safeguarded PCB equipment that is one of the key deliverables of the project. Arrangements for shipment of the PCB waste to a certified high-temperature incineration (HTI) facility abroad could take considerable time as this process includes specialized political, technical, and legal procedures. Trans-boundary movement of the PCB waste could be one of the main hurdles in execution of the ultimate disposal abroad, as it cannot be fully addressed by the national authorities only but has to be tackled through inter-country agreements according to provisions of the Basel Convention.

Internal approval procedures for procurement of goods and services for the project caused delays in the project implementation during the initial two years of the project. The project management arrangements were found in line with the approved Project Document with the exception of the Technical Advisory Committee that was not created as planned. The MTR also observed that the Project Steering Committee has been composed almost solely of institutions

responsible for regulation and enforcement while waste holders and entities responsible for treatment of waste have not been sufficiently involved in the project implementation.

Preparation of subsidiary regulations is dependent on adoption and promulgation of the HCM Act. The legislative process is out of direct control of the project team but has to be coordinated with preparations for drafting subsidiary regulations under the Act.

Absence of technical guidelines for handling and transport the PCB-contaminated equipment create environmental and health risks from leakage during packaging and in-country transport.

Administration of the micro-grants scheme for demonstration of the 3R principle in waste management is planned to be conducted solely under auspices of the MECCT. Inclusion of WAMCO will enable better evaluation of technical quality of proposals.

The project has successfully updated the Gender Action Plan, but implementation of the latter has been limited to equal participation of men and women in the project (GAP Objective 1).

The project has produced several products for public awareness but there is no concrete plan how to reach the target beneficiaries. More targeted public awareness approach towards the ultimate project beneficiaries contribute to better understanding of health and environmental impacts of PCB and u-POPs releases.

There are two investment projects related to waste management are implemented by the MECCT in parallel with the current project and therefore constitute important partnerships for the project. Collection and sharing of information about the parallel projects contribute to better synergies in implementation.

Substantial amounts of co-financing were pledged by several project stakeholders. The actual co-financing contributions are not followed in a systematic manner throughout the project implementation.

The project organized capacity building events but there is no information on impact of the events on the trainees.

Recommendation Summary Table

No.	Recommendation	Entity
		Responsible
1.	The UNDP CO in cooperation with the PMU should review the internal	UNDP
	approval procedures for procurement of goods and services for the project and	CO+PMU
	identify procurement bottlenecks and options for acceleration of the	
	procurement processes	
2.	The UNDP CO in cooperation with the Procurement UNDP Regional Hub	UNDP
	should maintain close monitoring of the process for international procurement	CO+BRH
	of services for packaging, shipment, and ultimate disposal of PCB waste to	
2	The MECCT with aggistence of the UNDP CO should actively each	MECCTLUNDD
5.	involvement of high level officials relevant for properties of the trans	MECC I+UNDP
	houndary movement of the DCB waste from this project	
1	With guidance from LINDP and following consultative processes, the PMU	PMI I+I INIDP
т.	should conduct a critical revision of the targets on the number of jobs for	
	environmentally sound handling of hazardous waste (Component 2) and the	COTKIA
	target on number of direct beneficiaries and prepare a proposal for revised	
	targets for submission to the 3rd meeting of the PSC.	
5.	The MECCT in cooperation with UNDP CO should consider participation of	MECCT +
	WAMCO and FENAKA in the meetings of the Project Steering Committee for	UNDP
	more effective project monitoring and oversight	
6.	The PMU in cooperation with MECCT should critically assess feasibility of the	PMU+MECCT
	work on development of economic instruments and incentives for POPs	
	management under the current project.	
7.	The PMU should actively monitor the legislative approval process for the HCM	PMU
<u>^</u>	Act and eventually advance consultations for drafting of subsidiary regulations	
8.	The PMU should ensure that the CTA accelerates the work on development of	PMU +with
	technical guidelines for handling and transport of PCB equipment including	CTA support
0	The DMLL in according with the MECCT should consider involvement of	DMU+MECCT
9.	WAMCO in the administration of the micro-grant scheme	FINICTINECCI
10	The LINDP CO should ensure further canacitation of the PMI and the PSC	LINDP CO
10.	related to data and information collection on equity of benefits by men and	
	women (GAP Objective 2) and development of adequate reporting tools	
11.	The PMU with support from the UNDP M&E focal point should develop a	PMU+UNDP
	Stakeholder Communication and Knowledge Management Plan for the project	M&E
	and periodically track and report on the results of implementation of the Plan	
12.	The PMU should collect the information on implementation of the parallel	PMU
	projects on waste management for reporting to the PSC and annual PIRs.	
13.	The PMU should systematically collect the information on co-financing by	PMU
	different stakeholders and report in annual PIRs.	
14.	The UNDP CO should assist the PMU in a periodic review of the project risks	UNDP CO
	for recording in the risk register and reporting to the Project Steering	
1.5		DMU
15.	I he PMU should ensure that evaluation of the training workshops is conducted	PMU
	and included in the training workshop reports	

1. INTRODUCTION

This report summarizes the findings of the independent Midterm Review (MTR) conducted via virtual meetings between 4 August 2022 and 30 September 2022 for the UNDP-GEF Project *Eliminating POPs through Sound Management of Chemicals* that received a US\$3,675,000 grant from the Global Environment Facility (GEF) in October 2019.

1.1. MTR Purpose and Objective

As outlined in the GEF Monitoring and Evaluation Policy, Mid-Term Evaluations (also known as Mid-Term Reviews, MTRs) are a mandatory requirement for all GEF-financed full-sized projects and constitute an important part of the GEF projects' monitoring and evaluation plan. MTRs are primarily a monitoring tool to identify challenges and outline corrective actions to ensure that a project is on track to achieve maximum results by its completion. In order to fulfil the above purpose, MTRs are conducted in order to assess the projects' progress towards results, implementation, and adaptive management for improvement of outcomes, facilitate early identification of risks to sustainability and provide supportive recommendations.

The objective of this MTR is to provide the project partners i.e., GEF, UNDP, key stakeholders/ private institutions, and the Government of the Maldives (GoM) with an independent assessment of the project's strategy and the progress towards achievement of the project objectives and outcomes as specified in the Project Document. MTR also provides assessment of early signs of project success or failure with the goal of identifying the necessary changes to be made in order to keep the project on-track to achieve its intended results. A special assessment was made in relation to the impacts of COVID-19 pandemic to the project implementation and on providing possible solutions to the delays of project implementation. Finally, the MTR also reviews risks to sustainability.

As a standard requirement for all projects financed by GEF, this MTR has been initiated by the project Implementing Agency, in this case UNDP CO in the Maldives. This MTR has been conducted according to the guidance, rules and procedures established by UNDP and GEF as reflected in the UNDP Evaluation Guidance for GEF Financed Projects².

1.2. MTR Scope and Methodology

This MTR covers all activities undertaken in the framework of the project. The time scope of MTR is the implementation period of the PCB project from February 2020 up to September 2022. The geographic scope of the evaluation is the Maldives.

The MTR has been carried out using a participatory approach that seeks to inform and consult with key stakeholders associated with the project using the primary criteria for UNDPsupported, GEF-financed projects that are listed in the Terms of Reference for the evaluation,

² Guidance for Conducting Midterm Reviews of UNDP-supported, GEF-financed Projects UNDP-GEF, 2014 The GEF Monitoring and Evaluation Policy, GEF Independent Evaluation Office, 2019 UNDP Evaluation Guidelines, UNDP Independent Evaluation Office, 2021

i.e., Project Strategy, Progress towards Results, Project Implementation & Adaptive Management, and Sustainability.

In addition to assessing the main criteria, the MTR provides ratings for key elements of the project implementation, presents recommendations for the remaining project implementation period, and draws relevant lessons for other similar project in the future.

Below is presented a summary of the elements covered in the MTR based on the Terms of Reference (TOR) that is provided as Annex 1.

Project Strategy

- Project design
- Results framework/logframe

Progress towards Results

- Progress towards outcomes analysis
- Remaining barriers to achieving the project objective

Project Implementation and Adaptive Management

- Management arrangements
- Work planning
- Finance and co-finance
- Project-level monitoring and evaluation systems
- Stakeholder engagement
- Social and Environmental Standards (Safeguards)
- Reporting
- Communication & knowledge management

Sustainability

- Financial risks to sustainability
- Socio-economic risks to sustainability
- Institutional framework and governance risks to sustainability
- Environmental risks to sustainability

1.3. MTR Approach and Data Collection Methods

The MTR used the following evaluation instruments:

Evaluation matrix: An evaluation matrix was constructed based on the evaluation scope presented in the TOR. The matrix is structured along the four GEF evaluation criteria for MTRs and includes principal evaluation questions. The matrix provided overall direction for the evaluation and was used as a basis for interviewing stakeholders and reviewing project documents. The evaluation matrix is provided as Annex 2.

Preliminary documentation review: The evaluators conducted a review of documents that were made available by the UNDP CO as well as other documents found from various other sources.

The documents served as the main source of information and for preparation for the data collection phase of the MTR.

Due to uncertainties related to the COVID-19 pandemic, the TOR does not envisage the International Consultant to undertake an evaluation field mission to the Maldives. In order to perform consultations with selected project stakeholders, a series of virtual and remote meetings with selected project stakeholders were conducted using on-line meeting platforms (Zoom, Skype, etc.) The preparation of the virtual meetings was done in close coordination with the UNDP CO.

Interviews: The MTR team conducted a number of virtual consultations with a representative selection of project stakeholders using semi-structured interview questions. Through the interviews, the evaluators obtained information about the key informants' impressions and experiences from implementation of the project. Triangulation of results, i.e., comparing information from different sources, such as documentation and interviews, or interviews on the same subject with different stakeholders, was used to corroborate or check the reliability of evidence. The list of people interviewed is provided as Annex 3.

Information Analysis: In parallel with the interviews, the MTR team conducted systematic and extensive review of available project-related documents. Data analysis involved organizing and classifying the information collected, summarizing it, and comparing the project achievements with other appropriate information in order to address the evaluation questions and fulfil thus the purpose of the MTR. In this process, the evaluators took care of checking factual evidence, ensuring its accuracy, and translating the data into usable formats or units of analysis related to the evaluation questions. The list of documents consulted is provided as Annex 4.

1.4. Structure of the MTR Report

This report closely follows the structure of the MTR report outlined in the Terms of Reference that was prepared by UNDP Country Office in the Maldives as the commissioning unit for this MTR.

The first part of the report describes the project background and summarizes factual information that was assembled during the initial data collection phase. The second part contains information that was collected through consultations with the key stakeholders before, during and after the interviews with the keys project stakeholders. The third part provides evidencebased conclusions connected to the findings from the second part and recommendations in the form of corrective actions for the design, implementation, management arrangements as well as for monitoring and evaluation of the project.

1.5. Constraints and Limitations

The MTR was conducted during the continued global crisis due to the COVID-19 pandemic. At the time of the MTR preparation, it was uncertain whether normal travel would be possible during the MTR process. Consequently, the TOR for the MTR did not envisage the International Consultant to undertake an evaluation field mission to the Maldives and the IC was supported by the National Consultant.

Interviews with as many identified stakeholders as possible were conducted remotely through digital platforms. However, visits to relevant project sites were not carried out as they would normally be. This limited the ability of the MTR team to use direct observation at the stakeholder and beneficiary institutions for gathering additional information, triangulating previously obtained information, and getting a broader picture of the stakeholders' activities.

Last but not least, the MTR team experienced challenges to connect with few stakeholders who either did not want to connect or were unsure about their representation in the interviews which prolonged the time needed for the interview process.

2. PROJECT DESCRIPTION AND BACKGROUND CONTEXT

2.1. Project Context

It is well known that the exposure to Persistent Organic Pollutants (POPs) can lead to serious health effects including certain cancers, birth defects, dysfunctional immune and reproductive systems, greater susceptibility to disease and damages to the central and peripheral nervous systems. The Stockholm Convention on POPs has been established based on the consideration that, given the long-range transportation of POPs, no one government acting alone can protect its citizens or its environment from POPs.

PCBs are among the most toxic and persistent POPs listed in the Stockholm Convention. Although PCBs were mostly used in closed systems, such as transformers and capacitors, very often such equipment is recycled at the end of their operational life and the PCB oil contained therein can be either directly wasted in the environment, recycled, or even sold as fuel oil.

At the project inception, waste generation was estimated at 324,000 tonnes annually out of which approximately 0.5 to 11% comprise hazardous chemicals and approximately 3-9% plastics (depending on location and size of the islands). The fact that chemical waste is being generated on almost 300 islands 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.

Polychlorinated biphenyls (PCBs) and unintentional POPs (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. The production of U-POPs including polychlorinated dibenzo-p-dioxins (PCDD), polychlorinated dibenzofurans (PCDF), PCBs 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. 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. About 21% of waste is attributed to tourism with the balance divided among urban areas (65%) and island communities (35%). 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 chemicals³.

The Maldives acceded to the Stockholm Convention on Persistent Organic Pollutants (the Convention) in October 2006. In response to Article 7 of the Convention, the Government of

³ National Implementation Plan to the Stockholm Convention on Persistent Organic Pollutants, MoEn, 2016

the Maldives (GoM) developed its National Implementation Plan (NIP) and submitted the NIP in July 2017.

The Maldives is Party to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (since 2000) and to the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (since 2006).

2.2. Problems that the project will address

The barriers to the sustainable management of POPs at the project inception can be summarized as follows:

Lack of coordination mechanism among relevant stakeholders: POPs, chemical and waste management involve a wide range of governmental and non-governmental stakeholders which have different roles and responsibilities along the chemical life cycle. There was a perceived 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.

<u>Weak enforcement of legislative and policy frameworks for sound management of chemicals,</u> <u>including POPs:</u> Legal instruments to regulate import, storage, transport, use and disposal of POPs were lacking or inadequate. Despite several amendments, the existing Waste Management Regulation⁴ was considered inadequate and therefore to be replaced by a Waste Management Act. Accelerating the enactment of laws was slow 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, they were not tied to any legislative norm and enforcement and proper monitoring procedures.

Lack of data on import, use and disposal of chemicals: The database in the Central Chemical Management System (CCMS) within the network of the National Centre for Information Technology (NCIT) did not include POPs chemicals or POPs-containing articles; thus, there was 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) was not incorporated into the CCMS and thus regulatory authorities could not capture POPs and other hazardous chemicals-related releases to air, water and soil and/or transferred off-site for treatment or disposal.

<u>Dispersed hazardous and waste generation, collection, transport and disposal:</u> 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 the Maldives.

Lack of technical expertise and capacity, including availability of ESM practices and disposal infrastructure for hazardous chemicals, including PCBs: There was no technical expertise to deal with POPs in the Maldives. Because there is no sufficient capacity for collection,

⁴ Waste Management Regulation 2013/R-58

separation, storage, and disposal of different waste streams (especially hazardous chemicals and products-containing POPs), unseparated non-toxic and toxic waste had been disposed of in dumpsites through open burning to reduce waste volume and/or anaerobic compaction. For PCBs, there was 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 was no gender disaggregated data on POPs management and no evidence on the disproportionate health effects on women due to lack of data on employees in the waste management sector (private, community and household level). Also, there was no specific involvement of women in the drafting of waste and chemicals legislation.

2.3. Project description and strategy

The general objective of the project is 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. The objective is to be achieved through establishment of sustainable systems for the sound collection, labelling, storage, and disposal of hazardous POPs chemicals and waste as well as introduction of Best Environmental Practices (BEP) and Best Available Techniques (BAT) at the regional/municipality level, and at tourist resorts.

The project was designed to address the important aspects outlined below:

- Increase national POPs management capacities including development and enforcement of legislation: The legislative component of the project was designed to:
 - 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;
 - Establish a harmonized Central Chemical Management System (CCMS) within the NCIT covering chemicals' import, use, storage, management and disposal for POPs and PRTR system);
 - Strengthen capacity of regulatory authorities for the development and effective enforcement of regulatory measures related to inspections, transportation, storage, use and disposal of POPs, hazardous chemicals, and wastes;
 - Strengthen capacity of relevant national institutions for inspection, identification and monitoring procedures for chemicals, and products containing chemicals of concern
- Remove technical capacity barriers for inventory and management of POPs: The technical component was designed to:
 - Inventorize, analyse, label and map PCB-containing equipment and waste present in the country;
 - Facilitate the environmentally sound management and disposal of 24 tonnes of PCB-containing oil, PCB containing equipment and waste oil abroad;

- 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;
- Introduce BEP and BAT to reduce POPs releases from waste management;
- Increase levels of awareness through engagement of stakeholders: The issue of PCBs and u-POPs is typically not a well-known environmental issue. Therefore, there is a need to inform the key stakeholders and the general public about the benefits brought by the project so that the Government and other PCB owners are encouraged to undertake necessary actions.
 - Collect experiences, case studies, lessons learned and best practices into knowledge products for dissemination at national and global level to support replication;
 - Undertake awareness raising targeted at households, chemicals users, industries, and decision makers;
 - Prepare and implement 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

2.4. Expected project results

The global environmental benefits 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 tonnes of PCB-containing oil, equipment, and waste oil, as well as the prevention of 15 g-TEQ PCDD/F releases from open burning practices and low-technology incinerators.

The project will produce 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 and improve the workers' socio-economic situation. Release of the harmful chemicals into the environment will be reduced through adoption of a sound management system and treatment of additional PCB, thereby reducing potential exposure to these toxic chemicals, and protecting human and environmental health. 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.

2.5. Project implementation arrangements

The project was designed for implementation according to the UNDP's National Implementation Modality (NIM), according to the Standard Basic Assistance Agreement between UNDP and the Government of the Maldives, and the UNDP Country Office.

The institutional arrangement for the project described in the Project Document is based on the Ministry of Environment⁵ acting as the Implementing Partner, 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 arrangement further assigns the UNDP Country Office (CO) in the Maldives responsibility for overall monitoring of the project implementation, timely reporting of the progress to the UNDP Regional Office and GEF as well as organizing mandatory and possible complementary reviews and evaluations. In line with the selected implementation modality, the Government of Maldives may request the UNDP CO to provide direct services for specific purposes, according to its policies, rules, and regulations. These services (and their costs) are specified in the Letter of Agreement (Annex J of the Project Document).

The UNDP assistance also includes a quality assurance function for the project, and assignment of the UNDP Regional Technical Advisor, based in the Bangkok Regional Hub, for technical oversight and backstopping.

The Project Document also outlines the essential project management and governance structure in the form of a Project Steering Committee (PSC) and the Project Management Unit (PMU). The PSC is predestined to assume responsibility for provision of strategic guidance and oversight to the project, while the day-to-day management should be carried out by the PMU, that assumes overall responsibility for the successful implementation of all project activities and the achievement of planned project outputs.

2.6. Project timing and milestones

The project was developed as GEF-6 project for a duration of 60 months. The key project milestones are summarized in Box 1 below.

Milestone	Date
PIF submission to GEF	April 2017
PPG approval by GEF CEO	23 May 2017
GEF CEO Endorsement	16 October 2019
Project Document signature	6 February 2020
Date of Inception Workshop	5 November 2020
Mid-Term Review	August-September 2022
Terminal Evaluation (expected)	November – December 2024
Project closing (planned)	February 2025

Box 1:	Key	project	dates
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For elaboration of the full-size project, a Project Preparatory Grant (PPG) was approved by the GEF on 23 May 2017. The main project was approved for implementation as a full-size GEF

⁵ Since 2020 the Ministry of Energy, Climate Change and Technology

project on 16 October 2019. The implementation of the project started with the official signature by the GoM on 6 February 2020. The planned end date of the project is February 2025.

The GEF grant approved for the project amounts to US\$3,675,000.00 with co-financing contributions from UNDP TRAC resources (\$65,000), the GoM (\$57,877,272.96) and the private sector (\$1,473,803.75. With the GEF grant and the co-financing contributions, total resources committed at the project inception reach \$63,091,076.71.

2.7. Main project stakeholders

The Project Document identifies an array of the project stakeholders and presents analysis of their potential involvement in the project. The main stakeholders and their expected roles and responsibilities relevant to the project are summarized in Annex 5.

3. FINDINGS

This section brings a summary of empirical facts based on the data collected during the extended document review and interviews with selected project stakeholders. The MTR team paid particular attention to cross-verification of the evaluative evidence using multiple sources of information and, to the extent possible, avoid overreliance on opinions obtained during the interviews.

3.1. Project strategy

The MTR team conducted an analysis of the design of the project as outlined in the Project Document and assessed whether the project strategy is proving to be effective in reaching the desired results. In doing so, the evaluators judged the extent to which the project addresses country priorities and is country driven. Furthermore, the evaluators assessed the extent to which the project objectives are consistent with the priorities and objectives of the donor and implementing agencies.

3.1.1. Project Design

The project is aligned with the Strategic Action Plan (SAP) of the Government of Maldives for 2019-2023 as a central policy framework and planning document that guides the overall development direction of the Maldives for the five-year period. The project links to the following SAP Policies:

Policy 1: Strengthen the legislative, regulatory, institutional framework and the human resource capacity to facilitate effective environmental protection Policy 4: Develop mechanisms to ensure the sound management of chemicals Policy 5: Strengthen information management and resource mobilisation

The project also links to the National Implementation Plan (NIP) of the Maldives under the Stockholm Convention on Persistent Organic Pollutants that mentions management of PCB waste and reduction of u-POPs as priority areas.

Furthermore, the current project aligns with the GEF-6 Chemicals and Waste (CW) Focal Area where GEF continues to play a catalytic role in leveraging budgetary resources from national governments and incentivizing the private sector to contribute more to the achievement of elimination and reduction of harmful chemicals and waste.

Specifically, the PCB project addresses Programme 1 of the CW area that requires the countries to "Develop the enabling conditions, tools and environment for the sound management of harmful chemicals and wastes", and Programme 3 of the same that calls for "Reduction and elimination of POPs".

The project is also in line with the UNDP Country Programme for 2022-2026, namely with the following CP Outcome 2: *By 2026, national and subnational institutions and communities in Maldives, particularly at-risk populations, are better able to manage natural resources and achieve enhanced resilience to climate change and disaster impacts, natural and human-induced hazards, and environmental degradation, inclusively and in a sustainable manner.*

Specifically, Output 2.3 requires that "Policies, regulatory frameworks and capacities at national/ subnational levels strengthened for sustainable management of water and waste resources."

The MTR team concludes that the current project is highly relevant for the needs and priorities of the Maldives and consistent with the strategic and programmatic priorities of the donor and implementing agencies.

3.1.2. Results Framework/Logframe

The evaluators performed critical analysis of the Project Results Framework (PRF) in order to establish whether it has the necessary elements and whether it enables measurement of success and progress to success.

The conceptualisation of the current project started with preparation and approval of the Project Identification Form (PIF) that served as a basis for formulation of the Project Document (PD), approved by the GEF CEO on 16 October 2019.

The description of project results provided in Section IV of the Project Document comprises 3 Components, 5 Outcomes and 11 Outputs. However, the tabular form of the PRF provided in Section VI is not fully consistent with the text of Section IV as the PRF matrix table shows only 3 Components/Outcomes while Section IV enlists 5 Outcomes.

The PRF in Section VI provides a mixture of total 11 quantitative and qualitative Outcome Indicators complemented by indicator targets both for the mid-term and end-of-the project, including a mandatory indicator for sex-disaggregated number of project beneficiaries under the Project Objective.

The MTR team considers the definition of the Outcomes explicit and clear. The indicators at the level of Outcomes and their related targets are in line with the SMART criteria, i.e., specific (S), measurable (M), attainable (A), realistic (R) and time-bound (T). However, the indicators at the level of the Project Objective (PO) do not measure progress towards achievement of the PO. The first indicator is related to economic instruments as a specific legislative tool more appropriate for measurement of progress on enhancing the policy and regulatory framework for sound management of chemicals (Outcome 1.1). Moreover, formulation of the mid-term and EOP targets for this indicator is vague as it is not clear whether drafting or adoption of economic instruments would signify the achievement of the targets. The second indicator (number of direct project beneficiaries) does not measure the progress towards the PO either but rather measures the effect of the strengthened regulatory frameworks and improved management of POPs.

In line with the GEF recommendations, the Project Document also contains a Theory of Change that is shown on Figure 1 below.

Figure 1: The project Theory of Change (from the Project Document)



The above displayed Theory of Change (ToC) map is expected to summarise and depict the project strategy. The evaluators found few inconsistencies in the presented ToC diagram. While a ToC for a project is expected to show the entire project results chain (outputs-outcomes-objective), the above ToC shows Outcome Indicators at the level of Outputs. The ToC also shows development challenge instead of the Project Objective.

However, the outcomes are not mapped into a sequence for prioritization of their implementation. In this case, improved legal and institutional frameworks (Outcomes 1.1 and 1.2) are necessary preconditions for achievement of sound management of hazardous waste (Outcomes 2.1 and 2.2). Therefore, the ToC does not present sufficiently clear causal pathways that lead from the Outputs to the Outcomes and the Project Objective.

The MTR does not provide rating for the project design, as it is not requested by the GEF MTR guidelines.

3.2. Progress towards Results

3.2.1. Progress towards outcomes analysis

The information presented in this section has been sourced from the annual Project Implementation Reports (PIR) for 2020 and 2021, supplemented with information compiled from the stakeholder interviews. The GEF Tracking Tools at MTR were not prepared by the project team.

The progress towards the four project outcomes is presented for each outcome in separate Tables 2-4 and the overall progress towards the project objective is summarized in Table 5. The columns "Midterm Targets", and "End-of-project Targets" are populated with information from the project results framework. Using that data, the MTR team completed the column "Midterm Level & Assessment" and concluded whether: the end-of-project targets have already been achieved (colour of the "Midterm Level & Assessment" item green); is partially achieved or on target to be achieved by the end of the project (colour yellow); or is at high risk of not being achieved by the end of the project and needs attention (colour red).

Outcome	Outcome Indicators	Baseline	Mid-term Targets	End of Project Targets	Midterm Level & Assessment	Rating Justification
1.1 Policy and regulatory framework for the sound management of chemicals enhanced	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 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	At least 2 regulatory pertaining to POPs and SMC one national guideline on integrated waste management and 2 regional guidelines drafted	At least 2 regulatory pertaining to POPs and SMC one national guideline on integrated waste management and 2 regional guidelines drafted	Stakeholder consultations and workshop Validation workshop Draft Hazardous Chemicals Management Act CTA contracted including the following tasks: Develop guidelines and standards for handling of hazardous chemicals along the life cycle Inventory of Municipal Waste-related Sources of PCDD/F	See the text below the table
1.2: Key public and private institutions and entities capacitated to operationalize the regulatory and policy framework for the LCM of chemicals and wastes	#1: Number of government entities (especially involved in CCMS) with increased capacity to assess, plan and implement POPs- free 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	CTA contracted to develop training programmes for several stakeholders (laboratories, customs, enforcement officers), including A training manual for enforcement officers (in progress)	See the text below the table
	#2: A functional national coordination system is set up with capacity created to plan, implement and monitor POPs elimination/reduction interventions		No targets set	No targets set	MoU for upgrade of the MAKUDI portal	See the text below the table

Table 1: Achievements at MTR for Component 1:

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

The activities for this output in the Project Document were subject to revision at the 1st meeting of the Project Steering Committee (PSC) in December 2020. While the original plan was to draft secondary legislative documents under the Waste Management Act that was under development at that time, the PSC decided that to reorient the project support for drafting a primary legislation on overarching management of chemicals including provisions for implementation of the international conventions on chemicals and waste (i.e., the Stockholm, Basel, Rotterdam. and Minamata Conventions).

Apart from this change, implementation of the output was also affected by procurement issues. The initial tender announcement for consultancy services on developing the draft Overarching Chemicals Management Bill was published on the MECCT website in January 2021 but did not receive eligible offers despite being re-advertised thrice between February and April 2021. Consequently, the PMU initiated direct contracting in May 2021 that also did not produce any response. After the consultancy tender notice was published in the GoM Gazette, bids were received from two parties and the contract was awarded to the better offer on 30 June 2021.

Similar procurement delays were experienced for another consultancy for development of a baseline assessment on national use of chemicals and associated risks. The tender was first announced in September 2021 and re-advertised 4 times but without response from qualified bidders. Therefore, this task was included in the ToR for the Chief Technical Adviser (CTA).

In August 2021, the consulting company conducted a series of consultations with relevant institutions that had been identified as primary stakeholders active in the chemicals and waste management in the Maldives. The consultant produced a report that details the roles and responsibilities of all relevant stakeholders in relation to chemicals and waste management and lays down the observations made by the consulted stakeholders on their needs and expectations with regard to chemicals management.

There was another change in the scope of work of this deliverable. The decision of the 1st PSC requested to develop an overall legislative framework on management of all chemicals imported to and used in the country. However, stakeholder consultations conducted by the contracted legal consultant company reoriented the work on development of a legal instrument for management of only the chemicals controlled by the international chemicals conventions that the Maldives is a signatory or a party.

In January 2022, a consultation workshop was held with participation of 12 stakeholder institutions to discuss the drafting of the Overarching Chemicals Act. The result of the consultation was change of scope of the assignment to produce a Hazardous Chemicals Management (HCM) Act instead. With input from the consulted stakeholders, a validation workshop was held in February 2022 where the draft HCM Act was presented to and discussed with the stakeholders. The draft HCM Act was handed over to the MECCT for activating the necessary administrative procedures for enactment.

In addition to the above, the project supported preparation of a report on inventory of municipal waste-related Sources of PCDD/F.

Summary assessment of Outcome 1.1:

The project contributes to upgrading of the baseline legislation in terms of definitions and scope. Specifically, the 2019 Hazardous Chemical Regulation⁶ does not provide a definition of hazardous chemicals as it comprises only a list of chemicals not requiring import permit and states that all other chemicals not listed are classified as hazardous chemicals. The draft HCM Act provides the required definitions and incorporates provisions related to regulation of import, classification, listing, storage, handling, and disposal of hazardous chemicals. Once enacted, the Act will grant the MECCT legal power to introduce economic instruments for regulation of the life cycle management of hazardous chemicals.

Based on the above, the MTR rates progress on Outcome 1.1 as Satisfactory (S).

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

The project issued a letter to Ministry of Defence (MoD) requesting to identify the challenges faced by the MoD in operating the MAKUDI portal⁷. An MoU between the MoD and MECCT to upgrade the MAKUDI portal was signed in June 2021. The scope of the agreement is the provision of IT equipment required to upgrade the portal software to ensure 24/7 uninterrupted online service, safe data management and affirm data reliability. Moreover, according to the Ministry, it would resolve the challenges currently faced in providing training for software users. At MTR, the software upgrade was still in progress.

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

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

In March 2022, the PMU contracted a local consultancy firm to conduct a baseline assessment on national use of chemicals and associated risks. The work on the assessment was in progress during the MTR with the assessment report expected in October 2022. contract

Furthermore, the CTA was awarded with a new contract that comprises the following tasks:

- Undertake training on Globally Harmonized System of Classification and Labelling of Chemicals;
- Develop a training manual for enforcement officers (Customs, Police, Ports, EPA, URA, Coast Guard etc) on POPs trade with a specialized focus on preventing illegal

⁶ Hazardous Chemical Regulation 2019/R-1057, subsidiary to the Import Prohibition Act (Law No. 4/1975)

⁷ MAKUDI Chemical Information System manages data on the chemicals imported to the Maldives and issues online permits to importers.

import and transit of POPs chemicals or POPs containing mixtures or products and hazardous wastes; and

At the MTR, the work of above tasks was still in progress with no deliverables available.

Summary Assessment of Outcome 1.2:

The project contributes to upgrading of the baseline legislation in terms of definitions and scope. Specifically, the 2019 Hazardous Chemical Regulation⁸ does not provide a definition of hazardous chemicals as it comprises only a list of chemicals not requiring import permit and states that all other chemicals not listed are classified as hazardous chemicals. The draft HCM Act provides the required definitions and incorporates provisions related to regulation of import, classification, listing, storage, handling, and disposal of hazardous chemicals. Once enacted, the Act will grant the MECCT legal power to introduce economic instruments for regulation of the life cycle management of hazardous chemicals.

Implementation of this component also contributed to harmonisation of the respective mandates related to hazardous waste management between the two key ministries, namely the MECCT and MoD and paved way to upgrading of the MAKUDI portal.

Notwithstanding the progress described above, there is less advancement in the development of financial and economic incentives including EPR and PPP and preparation of subsidiary regulations and related technical guidance under the proposed HCM Act. The legislative process of enacting the HCM Act is subject to discussion in the country's political and legislative bodies and is therefore out of control of the project team. According to the interviews, development of subsidiary legislation could start only once the HCM Act is officially gazetted and enacted. Nevertheless, development of the planned subsidiary regulations under the HCM Act should be accelerated to ensure the drafting process and promulgation of the regulations is completed before the end of the current project. Also, the work under Outcome 1.2 (capacitation of key public and private institutions and entities) was still in the preparation at the MTR.

Based on the above summary, the implementation of Outcome 1.2 is rated Moderately Satisfactory (MS).

⁸ Hazardous Chemical Regulation 2019/R-1057, subsidiary to the Import Prohibition Act (Law No. 4/1975)

Outcome	Outcome Indicators	Baseline	Mid-term Targets	End of Project Targets	Midterm Level & Assessment	Rating Justification
2.1: 24 tonnes of PCB containing equipment and wastes identified, labelled, soundly managed and exported for disposal.	Volume of PCBs eliminated through the introduction of environmentally sound PCB management, including final disposal	NIP and PPG estimates that 24 metric tons of PCBs is stored or used in the Maldives	24 tonnes of PCBs safeguarded	24 tonnes of PCBs finally disposed of	Estimated 25-30 tonnes of PCB equipment collected and safeguarded in a temporary storage facility in Addu City RFQ on packaging and export of PCB- contaminated equipment for final disposal published Design of an interim storage facility in Addu City Contract for construction of the interim storage facility in Addu City (work in progress) Feasibility study for establishment of HCWM system on Thilafushi island Updated Gender Action Plan (GAP)	See the text below the table
2.2: POPs releases from unsound disposal and treatment of (hazardous) chemicals and wastes reduced	Volume/Amount of prevented release of PCDD/F	NIP and PPG estimates that open burning is the highest source of u-POPs release in the country	Release of approximately 5 g-TEQ PCDD/F prevented	Release of approximately 15g-TEQ PCDD/F prevented	Concept paper on micro-grants scheme for minimisation of hazardous waste pollution through the 3R principle	See the text below the table
	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 sound handling of hazardous waste	At least 224 jobs (20% female, 80% men) create to ensure environmentally sound handling of hazardous waste	About 30 temporary jobs in construction of the interim storage facility in Addu city (for 120-day duration of the construction works)	See the text below the table

Table 2: Achievements at MTR for Component 2:

<u>Output 2.1.1 Inventorize, analyse, label and map PCBs containing equipment and waste present</u> <u>in the country</u>

After the project inception, the PMU conducted a site visit to update the number of PCBcontaining equipment, their location and storage conditions in the Fuvahmulah Island and Addu City. It was established that several potentially PCB-contaminated transformers that had been operational on the Fuvahmulah island were replaced with cleaner ones by FENAKA. In July 2021, oil samples from the decommissioned transformers were sent to an accredited laboratory in Turkey for analysis of the PCB concentration. The results indicated very low PCB contamination of the transformers. At the MTR, the out-of-service transformers that had been temporarily safeguarded were still waiting to be transferred to the newly constructed interim storage facility.

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

It was decided to establish a hazardous waste (HW) interim storage facility within the planned regional waste management centre in the Hithadhoo district of the Addu City and place all outof-service PCB-equipment in a 1500 ft² temporary storage area within the facility.

In November 2021, the PMU held meetings with the Addu and Fuvahmulah City councils on establishment of interim hazardous storage facilities in Hithadhoo and on rehabilitation of potentially PCB-contaminated equipment and sites. However, due to travel restrictions imposed by the Government, the project team was unable to travel to the Fuvahmulah City to collect samples of potentially PCB-contaminated sites for testing. To address this limitation, the project CTA conducted online training to FENAKA staff in Addu and Fuvahmulah on collection of potentially contaminated oil and soil samples.

There were significant delays in procurement of consultancy services due to challenges to find qualified technical experts in the Maldives. In August 2021, a company was contracted to develop a design of the interim HW storage facility in Addu City. Further delays were experienced in the design of the interim hazardous chemicals and waste storage facility due to failure of contracted consultant to provide the deliverables in line with the contract schedule as a result of a medical emergency and due to postponed design approval by the Waste Management and Pollution Control Department of the MECCT.

Although the design was completed at the end of December 2021, the tender for construction of the facility was announced in March 2022 and the contract awarded to the best bidder in June 2022. The MECCT signed an agreement for construction of the HW storage facility with the contractor on 14 June 2022 at the Addu City Council⁹. According to the information from the contractor, the construction site was handed over to the contractor on 11 August 2022. After preparation of the site, the construction work started on 27 August. The expected date of completion is 120 days from the site hand-over, i.e., mid-December 2022.

⁹ https://timesofaddu.com/2022/06/14/hazardous-chemical-waste-storage-facility-to-be-set-up-in-addu/

Total 30 pieces of PCB-contaminated equipment (14 transformers and 16 switchgears) with the estimated weight 25-30 tonnes are to be placed in the temporary storage area and prepared for final disposal abroad. Upon intensive consultations of the PMU and UNDP CO with the UNDP Bangkok Regional Hub (BRH), a RFQ document package on international tender for environmentally sound packaging, transport and elimination of the PCB-equipment was published on the UNDP procurement portal on 4 September 2022. Apart from preparation of necessary documentation and clearances for the transboundary shipment of the PCB waste, the RFQ also requires preparation of an Environmental and Social Management Framework (ESMF) to comply with national regulations and international standards, and UNDP SES (Social Environmental Standards).

Summary assessment of Outcome 2.1:

The project has exceeded the mid-term target of safeguarding 24 tonnes of PCB waste through movement of estimated 30 tonnes of PCB transformers and switchgears into a temporary storage and has progressed with arrangements for export and final disposal of the safeguarded PCB waste.

Based on the above, the MTR concludes implementation of Outcome 2.1 is on rack and rates the progress as **Satisfactory (S)**.

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

The GoM decided to construct a hazardous waste management centre (HWMC) including interim storage and pre-treatment areas for the collected waste with the total required area of 5,000 ft² (464.52 m²). The location of the HWMC is within the waste acceptance area of the Thilafushi Regional Waste Management Centre.

In July 2021, the project awarded a contract for a feasibility study on establishment of a hazardous wastes and chemicals management system in Greater Malé. The feasibility study report was completed in December 2021 and included annexed outline of Standard Operating Procedures (SOPs), technical (functional) specifications for civil works and equipment, as well as information package for potential investors.

According to the report, the HWMC shall mainly serve for intermediate storage and subsequent transport to waste recycling, recovery, or disposal facilities abroad. In-country waste treatment shall be not considered because of low waste quantities that generate high specific costs.

Several planned activities under this output have been implemented with support of the parallel multi-donor Greater Malé Environmental Improvement and Waste Management Project with the Asian Development Bank (ADB) being the principal funding source. As the ADB project is classified as Category A project under the ADB safeguard policies, the MECCT recruited the Social and Environmental Safeguards Specialist. The TOR for the assignment was announced and the successful candidate was recruited in January 2022 for one year under the ADB-funded project.

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

The project originally aimed at a pilot demonstration of hazardous waste and chemicals treatment at the Vandhoo Regional Waste Management Centre. The 1st PSC meeting adopted a decision to focus on conducting a pilot demonstration project at the Thilafushi Regional Waste Management Facility for promotion of the 3R (Reduce, Reuse and Recycle) framework for minimization of waste that needs final treatment.

A concept paper was drafted as a guidance to develop projects for reduction of u-POPs releases from unsound waste management practices at municipality level through proper separation and final disposal of hazardous waste. The concept paper identified 5 waste streams potentially containing hazardous substances, namely household, e-waste, automotive, industrial/agricultural, and construction/demolition waste streams. The paper also contains outline of a micro grants scheme for support of small-scale projects prepared by NGOs, companies, councils, etc. Priority will be given towards projects which aim towards minimization of hazardous waste pollution. Prior to submission of proposals, the MECCT plans to hold a training programme on preparation of high-quality proposals. It is expected that the micro grants scheme will be operational in early 2023.

Summary Assessment of Outcome 2.2:

The MTR found only limited progress in implementation through preparation of the concept paper for demonstration of the 3R principle in the area of reduction of u-POPs releases and, as a matter of fact, the mid-term target of prevention of 5 g-TEQ PCDD/F releases has not been achieved.

The feasibility study for the establishment of the HWCM system for the regional waste management centres (RWMC) at Thilafushi does not relate directly to the current project targets. However, it is an important milestone in the hazardous waste management in the country as the study provides a conceptual-level design for the other regional waste management centres that are to be established on the Addu and Vandhoo islands. Once all RWMCs are established and operational, the level of waste segregation in the country will be increased, the cost of waste transportation to the regional waste centres will be reduced, and the risk of spill of hazardous waste during transportation will be minimised.

With regard to the above, the MTR did not find evidence of work planning for setting-up a collection, segregation, and transport system for hazardous waste management to be integrated into the RWMCs (Activity 2.2.1.4). The Project Document envisaged implementation of this intervention on assumption of co-financing from WAMCO and financing leveraged through the new EPR/PPP system. This assumption appears not realistic as WAMCO pledged only in-kind financing for the project and the work on economic instruments has not started by the MTR stage. The MTR established that planning of this outcome was not carefully considered during the project design phase as the development of the infrastructure for the RWMCs depends on progress in the parallel ADB project. However, the current project is expected to provide capacity building to waste management actors (WAMCO, waste haulage companies,

waste handlers, etc.) in the sound management, interim storage, and disposal of hazardous and toxic wastes.

The MTR noted that in August 2022 the PMU contracted an environmental consultancy to conduct research to establish baseline levels of persistent organic pollutants in the fish species around Thilafushi reef area. The MTR considers this consultancy to be outside of the scope of the project. The available minutes of the PSC meeting in December 2021 does not record any discussion about this subject so there is question about the purpose and approval of this consultancy.

The second target under Outcome 2.2, namely creation of a number of jobs on environmentally sound handling of hazardous waste was not achieved either and it appears to be overambitious and not realistic. Through its planned activities, the project can directly create only limited number of temporary jobs e.g., in construction of the interim storage areas for hazardous waste and in separation of waste streams. The project scope is mainly building of technical and institutional capacity as well as creation of public awareness required for implementation of investment projects that will create permanent jobs in environmentally sound handling of waste.

Based on the above, the MTR concludes that implementation of Outcome 2.2 needs to be accelerated and therefore rates the progress as **Moderately Satisfactory (MS)**.

Outcome	Outcome Indicators	Baseline	Mid-term Targets	End of Project Targets	Midterm Level & Assessment	Rating Justification
3: Monitoring and	Number of trainings	To date, there are no	Training materials	10 trainings	Updated GAP and train-the-trainers	See the text below the
learning, adaptive	carried out in line with the	specific gender actions	developed	carried out	workshop	table
feedback,	Gender Action Plan	Towards eliminating or	5 trainings carried out		2 training workshops	
outreach and	(Annex G)	reducing POPs				
evaluation	Sex-disaggregated	To date none of the	Awareness raised to	Awareness raised to 5,000	No data available	See the text below the
	number of people	inhabitants or workers	5,000 (2,000 female and	(2,000 female and 3,000		table
	reached through awareness	on tourism	3,000 male) on the	male) on the		
	raising events	resorts/dumpsite	human and	human and		
	on the human and	have been made	environmental	environmental		
	environmental risks of	aware of the dangers of	risks of POPs	risks of POPs and to ways to		
	POPs, and environmentally	POPs and ways to	and to ways to	reduce POPs emissions.		
	sound ways to reduce	eliminate or reduce	reduce POPs emissions			
	POPs emissions	POPs releases				
	Number of GEF M&E	0 GEF M&E	15 of GEF M&E	34 of GEF M&E	N.A.	See the text below the
	requirements met and	requirements	requirements	requirements met		table
	adaptive management	met by the project	met and adaptive	and adaptive		
	applied in response		management	management		
	to needs and Mid-Term		applied in	applied in response to needs		
	Evaluation findings		response to	and Mid-term		
			needs and Mid-	reviews findings		
			term review			
			findings			

Table 3: Achievements at MTR for Component 3
<u>Output 3.1.1 Experiences, case studies, lessons learned, and best practices collected, captured</u> <u>in knowledge products, and disseminated at national and global level to support replication</u>

Until the MTR there were no activities planned for this output as it will be delivered in the remaining period of the project mainly through implementation of MTR recommendations.

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

In July 2021, a professional PR company was contracted to develop awareness materials on sound management of chemicals. The contract produced total 10 awareness materials (3 leaflets and 7 posters) that are available for download from the MECCT webpage. However, no information was available on how the produced materials serve increase of public awareness on POPs. The contract with the company was terminated.

Awareness session was held for 5^{th} grade students (55 m, 45 f) as part of a special MECCT programme.

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

In March 2022, a gender specialist contractor conducted a capacity development training workshop on development of GAP with 42 participants (28 women and 14 men) from various government institutions, private institutions, state-owned enterprises, and NGOs in the Addu and Fuvahmulah cities. The workshop aimed at identification of women-specific issues in the chemicals and waste sector and recommend opportunities and strategies for women empowerment. The participants were trained as train-the-trainers targeting women groups to champion gender issues and empowerment, gender mainstreaming and up-scaling.

Summary assessment of Component 3:

The main deliverable under this Component is the updated GAP and train-the-trainers workshop that contributes to identification of gender issues and strategies for mainstreaming of gender in the chemicals and waste sector and for reduction of exposure to chemicals in the workplace and household. However, implementation of the Gender Action Plan has not taken a full speed and the efforts on monitoring and evaluation of project activities with regard to gender will have to be more systematic.

The progress on the awareness raising part of the component was limited to production of some awareness materials without a clear plan how to get the products to the target population. The project lacks a dedicated knowledge management plan with dedicated staff support for the rest of the project implementation period.

Based on the above assessment, the implementation progress under Outcome 3 is rated Moderately Satisfactory (MS).

Objective Indicators	Baseline	Mid-term Targets	End of Project Targets	Status at MTR	Rating Justification
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 exit	1 economic instrument 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	No economic instruments and incentives promulgated	See the text below the table
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 not available	See the text below the table

Table 4: Achievements related for assessment towards the Project Objective

Summary assessment of progress towards the Project Objective:

As already mentioned under the Project Design, the Objective Indicators are not suitable for direct measurement of progress towards achievement of the Project Objective.

In general, there are several challenges that discourage governments from utilizing economic policy instruments for management of chemicals waste. A recent analysis by UNEP under the Strategic Approach to International Chemicals Management (SAICM)¹⁰ stipulates that existing economic policy tools aimed at sound chemicals and waste management have not yet been well assessed and therefore may require further investigation and deeper understanding.

The Extended Producer Responsibility (EPR) suggested as one of the possible economic instruments may be more suitable for management of plastic waste¹¹ but far less ready for use on management of POPs chemicals. Moreover, the work on drafting of national-wide appropriate financial mechanism to encourage EPR and PPP under the current project (Activity 1.1.1.8) has not started by the MTR. Due to the very limited experience with introduction and use of economic instruments for waste management in the Maldives, the stakeholder consultations and drafting of the financial mechanism could take substantial amount of time potentially beyond the closure date of the current project. Therefore, the MTR team considers the aim to introduce economic instruments for sound management of POPs as an overambitious target.

With regard to the second Objective Indicator, data on the number of beneficiaries with reduced risks of exposure to POPs has not been systematically collected and reported by the PMU. Therefore, the MTR team was not able to assess progress in this area.

Based on the above, the progress towards achievement of the Project Objective is rated **Moderately Unsatisfactory (MU).**

3.2.2. Remaining barriers to achieving the project objective

Legislative barriers

The project was successful in drafting amendment of the baseline legislation. However, the new Hazardous Chemical Act has not been officially adopted and therefore related regulations and therefore enforcement of the new legislation could still pose a barrier to implementation of ESM. According to the reports by the legal consultant contracted by the project, there is still some overlap of mandates as several state institutions share identical or similar powers related to regulating and overseeing aspects related to chemicals (hazardous and non-hazardous) waste management.

The MoD has been identified as the primary institution tasked with the responsibility of issuing permits or authorization for import of hazardous chemicals under the Import Prohibition Act. Since hazardous chemicals are not defined under the subsidiary Hazardous Chemical

¹⁰ Role of economic instruments for the sound management of chemicals and waste, Policy Brief, UNEP, 2020

¹¹ Since 2021, the GoM is implementing a project on establishment of EPR scheme for plastic waste funded by UNDP via the Ocean Innovation Challenge

Regulation, dual permits are to be obtained for certain chemicals from the MoD and a relevant institution to which that class of chemical belongs.

Technology and infrastructure barriers

The MAKUDI Portal as the current centralized system in operation related to issuing requested import/export permits for chemicals lacks some important features, namely, the system does not send out notifications to approving institutions for new permit requests submitted by chemical importers, and these institutions are required to manually check for new requests within the system after logging into the system.

Furthermore, other than the MoD institutions are unable to generate reports by themselves and have to request the MoD for data and reports from the system on a needs basis. Based on the name, the type of any certain chemical may not be identifiable via the system that does not provide warning for substances requiring particular attention such as POPs and Rotterdam Convention substances.

The stakeholder consultations revealed only very limited resources (such as equipment, and tools) for identification and analysis of chemicals. Several institutions hinted at inadequate space and lack of testing equipment at the national laboratory to carry out all the functions. Although the laboratory established at the Maldives Customs Service (MCS) is well equipped for testing for narcotics, it does not have sufficient expertise and equipment for testing of chemicals.

Additionally, a lack of storage space for chemicals at the ports was reported, particularly for the chemicals confiscated by the MCS. Also, the current infrastructure and operational system in place for disposal of chemicals and hazardous waste is inadequate.

Awareness barriers

Despite the efforts of the project so far, the levels of awareness on the adverse effects of POPs appears to be low. The workers and affected communities are not fully aware of the health and environmental adverse effects of PCBs and u-POPs. While the low levels of awareness on PCBs and resulting mismanagement of PCB-containing equipment and contaminated transformer oil will no longer be an issue the PCB-waste is transported for ultimate destruction abroad, low level of awareness on negative health effects of u-POPs persists and does not trigger changes in practices for collection, separation and treatment of solid waste.

3.3. Project Implementation and Adaptive Management Arrangements

This section of the MTR report provides assessment of the seven components of the project implementation and adaptive management, namely management arrangements, work planning, finance and co-finance, project-level monitoring and evaluation, management of risks, stakeholder engagement, as well as reporting and communications.

3.3.1. Management arrangements

The project is being implemented following the UNDP's National Implementation Modality (NIM) with UNDP CO support, according to the Standard Basic Assistance Agreement between UNDP and the Government of the Maldives, and the UNDP Country Programme.

The institutional arrangement for the project described in the Project Document is based on the Ministry of Environment¹² acting as the Implementing Partner, 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.

In particular, the MECCT is responsible for:

- Approving and signing the multiyear workplan;
- Approving and signing the Combined Delivery Report (CDR) at the end of the year; and

• Signing the financial report or the Funding Authorization and Certificate of Expenditures (in line with the he Harmonized Approach to Cash Transfers (HACT) policy).

The UNDP Country Office (CO) in the Maldives is responsible for monitoring of the project implementation, timely reporting of the progress to the UNDP regional hub and GEF as well as organizing mandatory and possible complementary reviews and evaluations. It also supports the Implementing Partner through provision of project management cycle services as defined by the GEF Council. In addition, the Government of the Maldives may request UNDP direct services the following support services for the project: (a) identification and/or recruitment of project and programme personnel; (b) identification and facilitation of training activities; and (c) procurement of goods and services. These services (and their costs) are specified in the Letter of Agreement (LoA) between UNDP and the Government for the Provision of Support Services (Annex J of the Project Document).

In addition, the UNDP CO provides quality assurance function for the project, and the UNDP Regional Technical Advisor is responsible for technical oversight and backstopping of the project. The current project is assigned to the Bangkok Regional Hub (BRH). In early 2022, there was a change in the RTA that provides technical backstopping to the project.

The original project management arrangements are shown on Figure 2 below.

¹² Since 2020 the Ministry of Environment, Climate Change and Technology (MECCT)



Figure 2: Project organizational structure (as in the Project Document)

The Project Management Unit (PMU) has been established and located within the MECCT with responsibilities for the day-to-day running of the project, including overall project coordination, planning, implementation, monitoring, and reporting of all project activities. The PMU is led by a full time Project Manager (PM), who is a staff of the MECCT on sabbatical leave¹³.

As reflected in Figure 2, the PM was to be supported by a Project Assistant, 3 Working Group Coordinators and 3 Field Facilitators, as well as short-term experts. In reality, the PMU is composed only of 4 staff, namely the PM, an Administrative Assistant (AA), a Policy Coordinator for Component 1, and a WG Coordinator for Component 2.

The start of the project implementation was impeded by the unprecedented challenge of the I pandemic. After the signature of the Project Document by the GoM in February 2020, a state of Public Health Emergency was declared by the Minister of Health on 12 March 2020. A national lockdown that was imposed initially for 30 days and gradually extended until 4 July 2020 slowed down key initial actions under the project, in particular recruitment of the PMU staff. After the relief of the lockdown measures in July, the GoM and UNDP were able to conduct a normal recruitment process and the two essential members of the PMU (the PM and AA) were on board as of November 2020, i.e., 8 months after the official start of the project.

The original project management arrangements envisaged establishment of separate Technical Advisory Committees for each of the 3 project components. Although the 1st PSC meeting discussed establishment of one overall TAC for the projects, in reality it was not established.

¹³ The Maldivian Civil Service Act 5/2007

Annex D of the Project Document contains an abridged ToR for the TAC that comprises several tasks. Review of planned activities and provision of technical advice and inputs related to project implementation was included in the RTA contract while tasks related to technical coordination and information sharing between institutions was left with the PSC.

Although not mentioned in the original project management arrangements, the Project Document anticipates appointment of a Chief Technical Advisor (CTA). However, Annex D of the Project Document that contains ToRs for the project staff does not contain a specific ToR for recruitment of the CTA.

In preparation for the project implementation, UNDP CO prepared a ToR for the CTA in March 2020, and a qualified CTA was recruited at the project inception for initial period of 11 months (250 days) to be based in the UNDP CO in the Maldives. The ToR is very comprehensive and requires provision of services to the project in the following key areas:

- Technical and management services
- Project advisory and guidance
- Project monitoring and implementation support
- Training

A number of specific tasks were specified under each of the above areas. Although the TOR anticipated regular reporting of progress by the CTA, according to the PMU there were no CTA progress reports prepared under the first CTA contracting period.

In 2022, the CTA contract modality was changed. The same CTA has been contracted to provide technical oversight to the project remotely with duration of the contract 65 days. Several specific tasks are included in the ToR for the new CTA contract, namely development of framework and capacities for laboratory testing of POPs and development of training programmes for the customs and enforcement officers including preparation of training materials.

UNDP as the Implementing Agency provides the project assurance function through the UNDP CO in Malé as well as technical supervision and backstopping through the UNDP Regional Technical Advisor (RTA) located in the Bangkok Regional Hub. In addition, UNDP keeps a project oversight and monitoring function through organizing mandatory reviews and evaluations, as well as a direct support function in the procurement of the required goods and services.

The MTR observed that the RTA backstopping function for the related GEF-7 project¹⁴ is provided from the UNDP Istanbul Regional Hub and concludes that the physical separation of the RTA function for the two projects will require close coordination between the two RTAs.

The Project Steering Committee (PSC) has been established with membership of the key project stakeholders, namely the MECCT, MoD and several other ministries and agencies of the GoM. The role of the PSC is to oversee the project implementation, provide overall strategic policy

¹⁴ ISLANDS - Indian Ocean Child Project, UNDP/GEF (2022)

and management directions, review and make recommendations on the project progress, and approve annual project work and budget plans.

The standard requirement for GEF projects is to organize the Inception Workshop (IW) within few months after the project official start. In this case it was envisaged to organise the IW within two months after the Project Document has been signed by the GoM. Due to the above-described impediments, the IW was held on 5 November 2020 with participation of 26 representatives of different ministries and government agencies relevant to the project. A report from the IW shows that the IW fulfilled its purpose to inform the project stakeholders about the project strategy and discuss the roles and responsibilities of the project team, including reporting and communication lines.

The IW is normally considered as the 1st meeting of the PSC, or the IW and the 1st PSC are organised as back-to-back meetings. In this case, there was a time gap between the two meetings as the 1st PSC meeting convened on 9 December 2020. The 2nd PSC meeting convened on 22 December 2021. According to the minutes of the two PSC meetings, the Committee has fulfilled the expected tasks and functions, in particular assessment of the project progress, discussion of important project implementation issues and challenges, as well as approval of the annual work plans.

The MTR team found the planned management arrangements adequate for the size and level of complexity of the project. The actual management arrangements appear to be effective with the dedicated PMU led by a senior staff member of MECCT on sabbatical leave and supported by the technically competent international CTA. However, the absence of the TAC and change of the CTA contract modality to remote support could cause challenges on quality and timeliness of delivery of planned outputs related to the u-POPs (Outcome 2.2).

The Minutes of both PSC meetings indicate active involvement of the PSC members in the project oversight and provision of overall guidance to the project team on specific issues. However, the MTR team observed that the PSC membership is restricted to stakeholders with the regulatory functions (ministries and affiliated agencies) while other key stakeholders, namely the FENAKA Corporation as the holder of the PCB equipment and the Waste Management Corporation (WAMCO) as the lead agency mandated to provide a sustainable waste management solution throughout the country, are not included.

The MTR concludes that the actual management arrangements do not provide sufficient opportunities for discussion of technical aspects of the project implementation amongst the project stakeholders and limit active participation of wider range of project stakeholders that are not members of the PSC.

Based on the above findings, the project management arrangements are rated Moderately Satisfactory (MS).

3.3.2. Work planning

In line with the standard UNDP format, the PMU prepares results-based Annual Work Plans (AWPs) and presents to the PSC meetings for discussion and approval. Two AWPs were prepared for the years 2021and 2022 and annexed to the respective PSC meetings' minutes.

The MTR team noted interventions of adaptive management when several modifications at the level of project activities were introduced to and approved by the 1st PSC meeting in December 2020. Under Component 1, modified activities were developed for drafting an overarching regulation on chemicals management with provisions the implementation of the relevant international conventions on chemicals and waste, and for conduct of a baseline assessment on national use of chemicals and associated risks. Under Component 2, it was decided to conduct the planned pilot demonstration for hazardous waste and chemicals treatment in the Thilafushi regional waste management centre instead the original plan at Vandhoo. Under the same component, the planned demonstration on phase-out of low technology incinerators through waste at selected tourism resorts was replaced by promotion of the 3R principle for minimization of waste ends up with the incineration.

While the 2021 AWP contains only description of planned outputs, related activities, and the indicative implementation timeframe, the 2022 AWP contains in addition corresponding financial apportionments. The extended AWP format inclusion of allocated financial inputs is in line with the standard UNDP AWP format that increases transparency of the annual work planning and gives the PSC members better insight into the project implementation.

During the initial 2 years of the project, a vast majority of activities listed in the Project Document have been either completed or in progress, with exception of drafting the financial mechanisms (Activity 1.1.1.8) and support to establishment of a collection, segregation and transport system for hazardous waste management and integration into the RWMCs.

The MTR team considers the capacity of the PMU sufficient for delivery of a majority of the planned outputs in terms of quantity. However, some of the activities are planned in areas that are quite new to the country so external review is required to ensure quality of the deliverables. The MTR team noted that provision of technical expertise, quality control of interventions and support to the Project Manager for implementation of the planned activities has been included in generic manner into the 2nd contract of the CTA. However, the project would benefit from a more direct support to concrete individual deliverables.

Based on the above, the MTR team rates the project work planning Satisfactory (S).

3.3.3. Monitoring and evaluation

The Project Document states that the project performance monitoring and evaluation (M&E) will be conducted in line with the UNDP Programme and Operations Policies and Procedures (POPP) and the UNDP Evaluation Policy. In accordance with the GEF and UNDP M&E policies, the project M&E system comprises mandatory requirements (as outlined below).

The monitoring is provided in the first instance by the PMU that is responsible for regular monitoring of the project results and risks, including social and environmental risks. This is in line with the requirement to ensure project-level M&E is undertaken in cooperation with national institutes (in this case the MECCT) and is aligned with national systems so that the monitoring data generated by the project supports relevant national institutions and systems. In the second instance, monitoring is also provided through the annual PSC meetings.

<u>Project Implementation Reports:</u> The Project Manager, the UNDP CO and the UNDP-GEF Regional Technical Advisor compile annual Project Implementation Reports (PIRs) that cover the reporting period from July (previous year) to June (current year) for each year of the project implementation. Two PIRs have been completed covering the GEF fiscal years 2021 and 2022. The MTR team found both PIRs in line with the standard GEF PIR format containing adequate level of details in narrative descriptions of achievements during the reporting period as well as justified ratings of progress in project implementation and of overall progress towards the project development objective.

<u>Mid-term Review (MTR)</u>: In line with the M&E plan outlined in the Project Document, the independent MTR was initiated after the submission of the 2nd PIR to the GEF Secretariat. The Terms of Reference, the MTR process and the required outline of the MTR report follow the standard templates and guidance for GEF-financed projects available on the UNDP Evaluation Resource Centre (ERC). The MTR team is composed of one International Consultant and one National Consultant. Both consultants appointed by the commissioning unit to undertake the MTR assignment are independent from the organizations that have been involved in the designing, executing, and implementation of the project. The MTR team noted that commissioning of the MTR was delayed reportedly due to challenges to identify suitable evaluation consultants.

<u>GEF Focal Area Core Indicators:</u> The Core Indicators sheet at project baseline is provided as Annex B to the Project Document. However, there was no update of the sheet for the MTR.

Based on the above, the monitoring and evaluation of the project is rated Satisfactory (S).

3.3.4. Identification and management of risks

As a standard requirement of UNDP projects, the Project Document should contain a risk matrix composed of description and type of risks identified during the project preparation, assessment of risk impacts and probability, related mitigation measures, as well as owners of each risk.

Annex H of the Project Document contains a risk matrix with description of 12 risks of various types. The risk description, rating and proposed mitigation measures are summarized in Table 6 below.

Description	Туре	Impact and Probability	Mitigation Measures	Owner
1. Climate Risk (short term) -release	Environme	I = 4	Environmental risk assessments prior to the selection of	MECCT
of waste to sea as a result of flooding	ntal	P = 2	the interim PCB and hazardous waste storage	
due to storms and sea surge			sites/facilities),	
2. Climate Risk (long term) – flooding	Environme	I = 4	Urgent export of POPs from the country to prevent	MECCT
due to long-term sea level rise	ntal	P = 3	release to the global environment	
3. Economic incentives too low for	Financial/	I = 3	Detailed financial and economic incentives study,	MECCT
adoption and replication of BEP/BAT	Operational	P = 2	including cost-benefit analysis and PPP opportunities,	
			to outline most appropriate economic incentives	
			supportive of the revised legislative framework.	
4. Waste leakage due to dispersed	Operational	I = 2	Bulk transport methods to reduce transport costs and	MECCT
islands and costly logistics of		P = 2	training to all stakeholders involved in waste	
transport			management	
5. Change of mandate of institutions	Operational	I = 2	Inclusion of high officials in the PSC and the technical	MECCT
and roles during project	-	P = 2	advisory committee, thorough information management	
implementation				
Lack of coordination between	Political	I = 3	Set up of a national chemicals' coordination mechanism	MECCT
relevant institutions/ministries and		P = 1	with clear roles and responsibilities among the project's	
stakeholders			stakeholders	
7. New regulatory instruments (at	Political	I = 2	Selection of proper legislative instruments (embedded	MECCT
national and/or provincial level) not		P = 2	in existing regulations); establishment of a legal	
adopted within the project timeline			working group and extensive stakeholder consultations	
8. Delay in the project implementation	Regulatory	I = 4	Continuous communication with dependency projects	MECCT
due to co-dependencies with other	Operational	P = 4	to ensure mitigation measures are in place	
projects				
9. Unwillingness to separate at source	Other	I = 3	Targeted training at household level and will set-up a	MECCT
or extraction due to local conflict in		P = 2	formal waste separation mechanism at Vandoo, tourism	
pilots			resorts and municipality level	
10. Local community grievances in	Other	1 = 2	Training and awareness raising to local communities	MECCT
relation to project sites' selection		$\mathbf{P}=2$	and open competition selection procedure for low	
(environmental and human health			temperature incinerators	
concerns)	. .			Magaz
11. Potential PCB exposures to the	Environme	1 = 2	Proper PCB management developed and put into	MECCT
or in communities nearby	ntal	P = 2	facility	
12. Negative adverse impacts on	Other	I = 3	Ensure proper separation and treatment of waste	MECCT
gender equality and/or the situation of		P = 2	especially hazardous waste through empowerment of	
women and girls			the Women's Development group (e.g., training of	
8			trainers)	
	1	1		1

Table 5: Summary of project risks identified at the project inception

A periodic re-assessment of the initial risks is required as a standard part of the PIRs. Risks are reported as critical when the impact and probability are high (i.e., when impact is rated as 5, or 4 and probability is rated at 3 or higher). Critical risk management is a standard part of the annual PIRs and periodic re-assessment of a risk management plan by both PMU and RTA is fundamental to the project's proper functioning and success.

The 2021 PIR specifically mentions the risk related to the COVID-19 induced lockdowns that adds to risk No. 8 (Implementation delays) and calls for examination of other reasons for implementation challenges. As a response, the project team introduced adaptive ways of work (remote work, virtual meetings, and site visits) to mitigate the impact COVID-19 related delays. The same PIR does not address the other critical risk (No. 2). However, the mitigation measure is the export of PCB waste for final destruction abroad withing the project timeline.

The RTA suggested that the project team re-examines the list of risks in Atlas and provides an update in the next PIR. However, there is no update in the 2022 PIR. In line with the UNDP Enterprise Risk Management (ERM) policy, the project risks should be recorded in the ERM

Risk Register and risk reporting should be integrated in the mandatory project reporting cycle, including presentation of risks to the PSC.

The MTR team consider the risks No. 3 (lack of economic incentives for BAT/BEP) and No. 4 (waste leakage) were underrated on both probability and impact. The two risks should have been reported as critical risks and further monitored as both have a high potential to negatively affect the progress towards achievement of the Project Objective and Outcome 2, respectively.

The Social and Environmental Screening Procedure (SESP) completed at the project preparatory phase identified total 7 risks and the Social and Environmental Screening Report (SESR) is provided as Annex E to the Project Document. Some of the risks identified in the SESP include, *inter alia*, economic, and physical displacement of local communities, waste leakage during waste transport and storage, as well as potential exposure to releases of toxic substances.

The SESP was updated in February 2022 and the resulting SESP risk matrix is provided in Table 7 below.

Description	Impact and Probability	Significance ¹⁵	Assessment and management measures
1: Economic displacement of informal waste collectors	I = 3 P = 1	Low	WAMCO is involved in the collection, transport and disposal of waste. Hence, displacement of stakeholders currently involved in the processes of collection, transportation, and disposal of waste is not envisaged
2: Potential displacement of local community members by any infrastructure, including but not limited to, the temporary storage sites and any change in road or shipping infrastructure, involved in the project	I = 3 P = 1	Low	Additional technical assessments and management planning related to potential releases of chemicals and waste from various stages of collection storage, transport, and disposal in the course of the project.
3: Risk of release of hazardous substances during transport between facilities, storage, export for disposal and testing of substances	I = 5 P = 3	High	It's planned to undertake an Environmental Impact and Social Assessment before activities that pose potential threat to environment and human health. The EIA document could also incorporate social assessment in line with the donor and UNDP requirements.
4: Risks associated with siting and characteristics of storage facilities that may mean increased vulnerability to Climate Impacts and risk to workers, local community, and ecosystem health	I=4 P=3	High	As this project is rated overall as a High-Risk project, there will be an Environmental and Social Impact Assessment (ESIA) with an Environmental and Social Management Plan (ESMP)which will be carried out at the start of Project Implementation ahead of the start of any
5: Upgrading/Retrofitting of facilities could harm workers and/or communities if poorly managed and there is structural failure	I = 3 P = 3	Moderate	other project execution. Note that this, will also update the current Stakeholders Engagement Plan (SEP) and Gender Action Plan, as well as address management plans, as necessary for areas such as Livelihoods, and include
6: Capacity of workers may not be sufficient to execute safe collection, packaging, transport, storage, and/or disposal steps	I = 4 P = 2	Moderate	additional technical assessments and management planning related to potential releases of chemicals and waste from various stages of collection storage, transport and disposal in the course of the project.
7: Potential perception of gender inequality and/or unintentional social backlash against the attempts to especially include women into the recognized waste management infrastructure	I = 4 P = 2	Moderate	Gender disaggregated data needs to be collected during such assessments of capacity. During implementation phase, low risk and high-risk work labours will be identified and separated and high- risk activities will be conducted though licensed international experts.

Table 6: Abridged SESP risk matrix (as of March 2022)

¹⁵ Significance (Low, Moderate, High)

In line with the SESP risk rating, the project is rated as a high-risk project that implies conduct of an Environmental and Social Impact Assessment (ESIA) and preparation of an Environmental and Social Management Framework (ESMF) and other technical management plans related to the collection, packaging, transport, storage, and disposal of waste in the course of the project. Furthermore, it calls for a more extensive engagement with local communities and fine tuning of engagement with larger stakeholders.

The MTR team considers the initial identification of project risks reasonable in terms of description but imperfect in classification of critical risks for the project implementation in terms of probability and impact. Consequently, the risk reporting in PIRs did not comprise key risk management measures required by the standard practice of UNDP/GEF projects. Otherwise, the MTR found the SESP conducted in line with the standard UNDP requirements.

Based on the above, the MTR team rates the identification and management of risks as **Moderately Satisfactory (MS).**

3.3.5. Finance and co-finance

The tables below provide a summary of resources allocation for the project and of level of disbursement of the GEF grant funds as well as the estimated actual amount of co-finance up to MTR.

Table 7 below displays comparison of the GEF budget and expenditures by individual project components and breakdown of the GEF project grant disbursements by years of implementation.

		Expenditures (US\$)			A (
Project Component	Budget (US\$)	2020	2021	2022	2020-2022	%
Component 1	377,856.90	6,785.02	105,923.38	30,543.19	143,251.59	37.91
Component 2	2,930,130.00	0.00	149,245.44	17,999.06	167,244.50	5.71
Component 3	192,120.00	0.00	11,270.26	10,360.13	21,630.39	11.26
Project Management	174,893.10	8,391.56	17,170.26	12,458.87	38,020.69	21.74
Total	3,675,000.00	15,176.58	283,609.34	71,361.25	370,147.17	10.07

Table 7: Allocation and disbursement of GEF funds (as of 30 June 2022)

The financial data in Table 7 shows that as of 30 June 2022 the total disbursement of the GEF grant at the MTR stage stands at US\$370,147.17 that gives the overall rate of implementation of the GEF grant 10.07%. The project has already entered the second half of its implementation period and has the outstanding unobligated budget balance of US\$3,304,852.83 available for the remainder of the project implementation period.

The rates of implementation for the individual project components reflect the achieved progress towards the end-of-project targets described above (see Tables 2-5 and related text). The data in Table 7 shows that the implementation rate for Component 1 (37.91%) is adequate for the

mid-term point of the project while the relatively low implementation rate for Component 3 (11.24%) is understandable as this component covers knowledge management and M&E activities that are expected to increase in the second half of the project period.

The low implementation rate for Component 2 reflects the fact that the two major investment activities, namely the construction of the interim storage facility, as well as packaging, and export for ultimate disposal of the PCB equipment at a certified facility just started shortly before the MTR. Since most of the project funds are allocated under this component, completion of the two investment activities will significantly increase the financial delivery not only for Component 2 but also for the entire project.

The budget allocation for Project Management is 4.75% of the total GEF grant that is in line with the GEF policy on budgeting of the Programme Management Costs (PMC)¹⁶. By the MTR stage, actual expenditures for PMC constituted only 21,74% of the total planned budget for this item. The low expenditure rate reflects the lower than planned level of the PMU staffing.

For management of the project finances, the UNDP CO facilitates timely processing of advances to the national Implementing Partner and checks against the initially agreed activities in the Project Document to maintain the pace of project delivery throughout implementation. The CO also provides guidance on liquidation of obligations and makes routine follow-ups in line with requirements of the Harmonized Approach to Cash Transfers (HACT) policy adopted by UNDP, including audit requirements under HACT and makes sure that the IP is engaged under an updated/current Macro Assessment. Moreover, the UNDP CO facilitates recruitment of an independent auditor for routine spot checks on the existing Long-Term Agreements (LTAs) for procurement.

The CO works closely with the PMU to budget for future project years and after its endorsement by the PSC meeting seeks allocation of Authorized Spending Limits (ASL) on the Project Information Management System (PIMS+) platform. Routine consultations are conducted with the RTA on compliance with the approved budget in the Project Document as well as GEF and UNDP fiscal policies and regulations.

Overall, the MTR team observed strong control over the project budget.

The co-financing commitment that the key project stakeholders made at the project inception (confirmed by means of official co-financing letters provided to UNDP) is considered an important indicator to assess the country's ownership of the project. The co-financing letters provided in Annex Q of the Project Document show that all in-cash co-financing was expected from 5 parallel projects implemented by the GoM. The in-kind contributions are based on the estimated operational cost for the Regional Waste Management Facility at Vandhoo by WAMCO and the cost of replacement of 14 transformers and 4 switch-gears by FENAKA.

Although the co-financing letter from the GoM sets the total contribution from the 5 parallel projects at US\$80.3 million, the Project Summary Table at p. 2 of the Project Document shows the GoM co-financing contribution at \$57,877,272.96. The MTR team understands that the co-

¹⁶ GEF Guidelines on the Project and Programme Cycle Policy – Annex 8, GEF/C.59/Inf.03

3 of the 5 co-financing projects had been implemented before the start of the current project and therefore were discounted so the total in-cash co-financing for the current project is made of two parallel projects, namely the Greater Malé Environmental Improvement and Waste Management Project (GMEIWMP) and the Maldives Clean Environment Project (MCEP).

Table 8 below summarizes status at MTR of the project co-financing by source.

		Type of Co- Amount (US\$)		nt (US\$)
Source of Co-financing	Name of Co-financier	financing	ancing At inception	
Recipient Government	MEE/MECCT	Cash	57,877,273	2,325,181.17
GMEIWMP	Asian Development Bank	Cash	017	13,711,870.12
GMEIWMP	Japan Fund for Poverty Reduction	Cash	017	114,688.52
MCEP	World Bank	Cash	017	9,082,586.94
Private sector	FENAKA	In-kind	264,400	264,400
Private sector	WAMCO	In-kind	1,209,404	619,326
All sources		All types	59,351,077	26,117,653

Table 8: Allocation of co-financing for the project by source

It follows from Table 8 that the actual reported parallel financing contributions at MTR reached US\$26,117,653 that is 44.0% of the total amount pledged by various co-financiers at the project inception.

The two parallel projects financed through the ADB and WB grants are expected to disburse combined about \$32.5 million in 2023 and further co-financing contribution is expected from the newly approved GEF-7 regional project. On this basis the MTR team concludes that it is realistic to expect the co-financing contributions will increase in the remaining period of the project. So, the total actual co-financing contribution to the current project could slightly exceed the pledged amount of \$57.9 million for the current project.

Despite the fact that the project managed to attract considerable level of co-financing, the PMU collects systematically only the co-financing information from the ADB project but not from other co-financiers. It is desirable that the PMU monitors the co-financing contributions in the remaining period of the project in order to ensure availability of information on actual co-financing contributions of all project stakeholders at the Terminal Evaluation.

Based on the above, the finance/co-finance component is rated Satisfactory (S).

3.3.6. Stakeholder engagement

A range of stakeholders had been consulted during the preparatory phase of the project to ensure their commitment to the project and active participation. Annex F of the Project Document

 $^{^{17}}$ The co-financing pledged at inception is included in the MEE/MECCT amount

presents a stakeholder engagement plan that identified key project stakeholders and their areas of interest. However, this list of stakeholders is rather generic and does not comprehend the differing relations of various stakeholders to the project, namely the distinction between core (involved) and tangential or peripheral stakeholders.

All core stakeholders are represented in the Project Steering Committee that serves as the primary point of stakeholders' engagement. However, it is noted that engagement of some PSC members in the project is limited solely to participation in the PSC meetings as some stakeholders do not have direct interests in relatively narrow scope of the project.

From the available reports and interviews with the MECCT and MoD representatives, it is clear that two ministries' extensive engagement in the preparation of the project has been continued in the implementation phase as they take active part in delivery of the various project outputs. Furthermore, the several stakeholders were also actively engaged through participation in the training events and in revision of the baseline legislation. It was noted that the PMU had organized several bilateral meetings with the Health Protection Agency, FENAKA, and the Addu and Fuvahmulah City Councils. Although WAMCO based on their mandate for waste management across the country has been on important stakeholder to the project, it has not been engaged in the project implementation.

The evaluators concluded that involvement of the core stakeholders in the project implementation has been strong as indicated by the knowledge and awareness by the interviewed stakeholders' representatives of the project goals and objectives, the progress in implementation of the project, as well as the remaining challenges. However, there is a room for strengthening participation of PCB holders (FENAKA and STELCO), WAMCO, and the affected city councils. Also, connections to tangential (peripheral) stakeholders that are indirectly affected by the project activities, such as academia and community-based/non-governmental organizations /CBOs/NGOs) was found weak or not existent. Strong engagement with relevant CBOs and NGOs is important for promotion of participatory citizenship in decision making of local government institutions as it can secure wider support for the project interventions, especially in cases advocacy or policy change are needed.

Based on the above, the evaluators rate the stakeholder engagement in the project formulation and implementation as **Moderately Satisfactory (MS)**.

3.3.7. Reporting and communication

Reporting during project implementation helps to identify potential issues that may endanger the project's capacity to achieve its development objectives. Reporting also helps to make informed decisions, provides valuable information for project evaluation, and provides lessons to be learnt for future projects. Effective and timely communication between the PMU and the core stakeholders is a key element in that respect.

The project reporting is described under the section "monitoring and evaluation" above. The MTR team considers the internal periodic reporting and obligatory reporting to the donor agency are satisfactory. However, there is ample scope to make better use of the learning and knowledge it contains for broader knowledge management and reporting.

The PMU meets with the UNDP CO on a bi-monthly basis to track progress against project results framework. During these meetings, detailed inputs are provided on accelerating delivery given throughout implementation along with advice on planning for the following quarters and years. Meeting minutes including follow-up actions are recorded and shared. The CO also monitors activity changes that the PMU is required to bring during implementation and coordinates with RTA/RPA to check compliance with GEF/UNDP regulations governing project implementation. The PMU also meets with the Waste Department of the MECCT.

The MTR team concluded that communication with the group of core project stakeholders – members of the PSC has been extensive.

Communication with a wider circle of stakeholders was planned through meetings of a Technical Advisory Committee (TAC). As the latter has not been established, this communication was restricted to bilateral interactions between the PMU and some peripheral stakeholders (WAMCO, City Councils) that are not members of the PSC. This communication was found less satisfactory as the bilateral meetings address specific issues without providing overall picture on progress in implementation to the peripheral stakeholders.

For facilitation of communication with the public at large, the project contracted a professional company. Information and awareness materials produced under this contract are available at the MECCT website. However, there is no information available on whether and how these materials reached the target population. Lack of effective communication with target beneficiaries could result in relatively low level of public awareness and insufficient understanding of the HCW-related issues as well as of health and environmental impacts of hazardous chemical waste.

The rating for the reporting and communication component is Satisfactory (S).

3.3.8. Gender Mainstreaming

The project was designed to reduce the exposure to PCBs and u-POPs particularly by eliminating the existing PCB waste and generating capacity for separation and better management of hazardous waste. This represents an improvement in the living conditions of vulnerable populations, such as the workers in the formal industry and the informal recycling sector, underprivileged, women and marginalized groups including women headed households in the surrounding communities.

The project has been assigned a gender marker 2 which indicates that gender equality and women's empowerment is a significant objective of the project¹⁸. A gender analysis was conducted at the project preparatory phase, and a Gender Action Plan (GAP) was provided as Annex G to the Project Document. This analysis found a robust national framework for gender equality on paper but extremely lacking in implementation.

The existing national primary legislative frameworks that embrace or address gender issues include:

¹⁸ Coding Definitions for Gender Equality Markers: Guidance Note, UN CEB, 2018

- The Constitution of the Maldives (2008)
- The Family Act (4/2000)
- The Employment Act (2/2008)
- The Gender Equality Act (18/2016)

The GAP was updated in early 2022 with the aim to ensure that the project activities are genderresponsive and transformative to redress existing gender inequalities and redefine the roles associated with gender through gender mainstreaming strategies. The GAP was also updated with regard to the current country context.

The updated GAP has three objectives as follows:

- 1. Increase participation of women in all project activities
- 2. Ensure equitable access to project resources and benefits for all women and men
- 3. Progress towards gender equality, including the change of household decision-making patterns, leadership in community-based organisations, and avenues for employment

During the implementation so far, the project team has made a concerted effort for collection of gender-disaggregated data on women participation government institutions, state-owned enterprises, private entities, and NGOs participated in the workshops. The project highlighted that gender-determined occupational roles have a primary impact on the level and frequency of exposure to toxic chemicals. It also emphasized that at the household level women usually assume a key role in ensuring that the proper management of chemicals and waste is adopted in the day-to-day practices, and they are therefore among the key targets for the project implementation. Therefore, continued training and building capacity of women's organizations will increase their decision making and result in greater empowerment.

The GAP implementation matrix comprises specific activities and number of targets related to the GAP objectives. Good progress was reported on activities related to inclusion/participation of women, knowledge management, as well as on awareness raising of gender equality and empowerment. Not much progress was reported for establishment of partnerships and identification of synergies with organisations that focus on women's empowerment and that are women-led. Also, more focus is expected on assessment of secondary and "informal" exposure of women to PCB waste and exposure to u-POPs, as well as on prioritization for clean-up of contaminated sites that pose risk to women and other vulnerable groups living in their neighbourhood.

The MTR concluded that the project enhanced visibility and awareness of gender-related issues related to waste management, and in sound chemicals management. Public awareness campaigns targeted both women and men equally. Reducing the exposure to chemical waste will provide both in immediate and longer-term positive health impacts for men, women, and children. At the same time, the MTR considers the 3rd objective of the GAP too ambitious for a project of this size.

Using the UNDP Gender Results Effectiveness Scale (GRES)¹⁹, the MTR rates the project implementation as **Gender Targeted**.

3.4. Sustainability

The sustainability is defined as continuation of benefits from an intervention after the development assistance has been completed. The important aspect here is the sustainability of results, not necessarily sustainability of the activities that had produced the results. The assessment of sustainability requires evaluation of risks that may affect the continuation of the project results.

In general, the activities supported by the project have the potential to ensure long-term sustainability but with serious challenges described in the text below.

3.4.1. Institutional framework and governance sustainability

Waste management is a particular challenge in the Maldives because of the country's especially high economic and social dependence on a healthy marine and island environment. The First Biannual Report to the UNFCCC describes waste management as "one of the biggest environmental threats the country faces". While the previously completed World Bank-financed projects²⁰ have created some capacity for solid waste management (SWM), there is still a strong need to develop a robust human resource and infrastructure capacity for hazardous waste management in the Maldives.

The current project has been aligned with the key agencies of the GoM responsible for regulation and management of waste chemicals, namely the MECCT, MoD and EPA. The same agencies had been involved in the previous projects and participate in the ADB-funded project implemented in parallel. Limited capacity building for management of hazardous waste was provided under the current project, the existing institutional base in the country still needs improvement.

It has to be noted that Maldives is in a specific situation in relation to the PCBs. Before the start of the current project, there were no guidelines from relevant government authorities to deal with the disposal of PCB-contaminated equipment. The country has relatively small quantities of PCB-contaminated equipment that will be addressed almost entirely by the current project.

Although in the baseline legislation there are laws to control the import and handling of various chemical and drugs in the Maldives, they do not address processing and management of hazardous waste. The Regulation on Hazardous Chemicals²¹ focuses on classification of hazardous chemicals (also applicable in case hazardous chemicals will arise as waste) and import, storing and disposal methods, the regulation lacks the information on the storing facility until disposal or the disposal methods to be followed.

¹⁹ The Gender Results Effectiveness Scale (GRES): A Methodology Guidance Note, UNDP IEO (2013)

²⁰ Maldives Environmental Management Project and Maldives Clean Environment Project, World Bank

²¹ Regulation Number 2019/R-1057

The Regulation on Waste Management²² stipulates segregation and handling of hazardous waste and lays down the regulatory structure for waste management. The Regulation on Protection and Conservation of Environment in the Tourism Industry defines that toxic or hazardous waste shall be kept in separate bins and shall be labelled as such. However, monitoring of waste sites and enforcement of the regulations is not always effective.

The current project addresses the fact that the framework legislation related to hazardous waste management empowers the regulatory authorities to further develop necessary bylaws and other governance structures guiding the decisions and actions taken by the regulators. Furthermore, the development of the Hazardous Chemicals Act under the current project addresses the need to establish more detailed policies taking into account relevant international laws and conventions on storage and transportation of hazardous waste within the national boundaries and for export. However, the progress of enactment of legislative tools is slow and the country still lacks some policies and procedures on management and implementation of relevant regulations.

Involvement of the responsible institutions of the GoM in the process of amendment of legal instruments is an important factor for ensuring sustainability of the project results from an institutional point of view. As all key stakeholders were involved in the process of formulation and drafting of the Hazardous Chemicals Act, it is expected that approval of the latter would not take too long. Only once the Act is adopted and promulgated, there is no further risk with regard to this aspect of sustainability, given the strong project alignment with key national and international priorities and the high degree of national ownership.

Additional strengthening of the capacity of relevant national institutions and further development of enabling policies regulatory frameworks for waste management is expected under the regional GEF project that has just started and will be implemented by UNDP for duration of 60 months²³.

Based on the above, institutional and governance sustainability of the project is rated Likely (L).

3.4.2. Financial sustainability

The financial sustainability has to be examined in relation to the importance of compliance with the obligations of the Maldives in relation to the Stockholm Convention. Following the provisions of this convention, all equipment found to contain more than 50 ppm of PCBs must be identified, labelled, and removed from service by 2025. The recent update of the PCB inventory confirmed relatively small quantities of PCB equipment (transformers and switchgears) in the country. According to experience from other similar projects, the project has sufficient funds for securing safe temporary storage, export, and environmentally sound final disposal of the PCB waste. The only concerns on the PCB part of the project are whether all necessary export permissions can be obtained in time for completion of this part of the

²² Regulation Number 2013/R-58

²³ ISLANDS - Indian Ocean Child Project, UNDP/GEF (2022)

project during the current project lifetime and whether the project procurement procedures will be effective for attracting an experienced contractor with functional links to a certified POPs waste destruction facility.

Activities under the u-POPs part of the project have been just initiated with only modest progress towards the planned targets. Consequently, continued financing will be needed, and sustainability of this part will depend on availability of additional financing beyond the timeframe of the current project. Currently, the country has been implementing the ADB-financed Waste-to-Energy project that has objective of improved solid waste treatment and disposal services in the Greater Malé Region and its outer islands. Although the latter project does not explicitly focus on hazardous waste, it addresses sorting of waste at source and sound management of separated waste streams that contribute to prevention of u-POPs releases from unsound solid waste management. As the current project and the ADB project are implemented by the MECCT, it is expected that close coordination between the two projects will ensure the required complementarity and adoption of measures for prevention of u-POPs releases.

Based on the above, financial sustainability of the project is rated Likely (L).

3.4.3. Socio-economic sustainability

Commitment to ultimate disposal of PCBs and prevention of adverse health impacts due to u-POPs releases are the main issues of socio-economic sustainability of the project. The institutional stakeholders (regulatory and enforcement agencies) are well aware of the issues and committed to address them. Due to the awareness raising component of the current project, there is some level of awareness of the adverse health and environmental impacts of PCBs and u-POPs, however this level is not sufficient throughout the country.

While the vast majority of the PCB waste could be eliminated by the end of the project, the u-POPs generation will constitute a continued risk to the environment. Insufficient awareness of the adverse environmental and health effects of the u-POPs by the public at large can cause challenges for sustainability of the u-POPs component of the project. A stronger and continued effort is required to increase public interest and awareness in this respect.

Based on the above, socio-economic sustainability of the project is rated **Moderately Likely** (ML).

3.4.4. Environmental sustainability

The environmental sustainability is closely linked to the development and strengthening of the primary legislative frameworks. Specifically, if the Hazardous Waste Act is not promulgated soon, there is a risk that secondary legislation on hazardous chemicals will not be developed and its enforcement not effective. Failure to reduce u-POPs emissions resulting from inadequate separation and handling of hazardous waste could produce environmental and health effects that may not be resolved in the way the project has been designed.

Due to lack of guidelines and legislative measures for disposal of PCB-contaminated oil in the Maldives, there was anecdotal evidence that such oil had been sold by utility companies to

island communities that applied the oil on wooden furniture and vessels²⁴. These cases indicate huge gaps in public perception of health and environmental impacts of PCB-waste.

Specific to the current project, the main environmental risk to the PCB component is related to insufficient uptake and practical implementation of technical guidelines for PCB transport, handling, and temporary storage. There is risk of leakage of PCBs in case transport, handling and storage of PCB-contaminated oil and equipment is not conducted strictly in line with the recommended internationally recognized procedures and if eventual leakage and spills are not contained according to the developed safeguards measures. This risk can be mitigated by provision of auxiliary equipment, safety arrangements at the temporary storage facilities, and remediation of contaminated sites.

Based on the above, environmental sustainability of the project is rated **Moderately Likely** (ML).

²⁴ National Implementation Plan to the Stockholm Convention on POPs, Ministry of Environment and Energy (2016)

CONCLUSIONS AND RECOMMENDATIONS

Based on the previous section of the fact-findings, this section synthesizes and interprets the findings into conclusions that make judgments supported by one or more specific findings. Recommendations are then specific actions the MTR team proposes to be taken by various project stakeholders that are based on the findings and conclusions.

<u>Conclusion 1:</u> Internal approval procedures for procurement of goods and services for the project caused delays in the project implementation during the initial two years of the project. For instance, there is a new GoM requirement to submit all procurement requests to the Ministry of Finance for approval. UNDP internally also scrutinizes project activities against its Social and Environmental Policy closely and conducts quality assurance reviews on project-level safeguards instruments. These new administrative procedures could cause delays.

<u>Recommendation 1:</u> The UNDP CO in cooperation with the PMU should review the internal approval procedures for procurement of goods and services for the project and identify procurement bottlenecks and options for acceleration of the procurement processes.

<u>Conclusion 2:</u> Ultimate disposal of the estimated 30 tonnes of the currently safeguarded PCB equipment is one of the key deliverables of the project. Timely and effective procurement of services for packaging, transport and ultimate disposal of the PCB waste abroad will be critical for achievement of the planned global environmental benefits of the project and for fulfilment of the GoM obligations under the Stockholm Convention. Qualified providers of such services will have to be recruited internationally. Due to its experience from similar implemented projects, UNDP could be better positioned to lead the procurement process in this particular case to minimise delays and ensure timely execution of the export.

<u>Recommendation 2:</u> The UNDP CO in cooperation with the Procurement UNDP Regional Hub should maintain close monitoring of the process for international procurement of services for packaging, shipment, and ultimate disposal of PCB waste to ensure timely and effective completion of the procurement process.

<u>Conclusion 3:</u> Arrangements for shipment of the PCB waste to a certified high-temperature incineration (HTI) facility abroad could take considerable time as this process includes specialized political, technical, and legal procedures. Trans-boundary movement of the PCB waste could be one of the main hurdles in execution of the ultimate disposal abroad, as it cannot be fully addressed by the national authorities only but has to be tackled through inter-country agreements according to provisions of the Basel Convention.

<u>Recommendation 3:</u> The MECCT with assistance of the UNDP CO should actively seek involvement of high-level officials relevant for preparation of the trans-boundary movement of the PCB waste from this project.

<u>Conclusion 4:</u> Few indicators and their targets in the project results framework are not realistic or not specific enough. Technical assistance by the current project cannot directly create high number of jobs for environmentally sound handling of hazardous waste (Outcome 2.2). The

indicator on number of direct beneficiaries for whom the risks of POPs exposure has been reduced (Project Objective) is not specific enough. Therefore, such indicators and/or targets need to be reconsidered in order to set realistic and more specific targets for the remaining timeframe of the project.

<u>Recommendation 4:</u> With guidance from UNDP and following consultative processes, the PMU should conduct a critical revision of the targets on the number of jobs for environmentally sound handling of hazardous waste (Component 2) and the target on number of direct beneficiaries and prepare a proposal for revised targets for submission to the 3rd meeting of the PSC.

<u>Conclusion 5:</u> The Technical Advisory Committee was not created as planned in the Project Document and the Project Steering Committee has been composed almost solely of institutions responsible for regulation and enforcement. Waste holders and entities responsible for treatment of waste have not been sufficiently involved in the project monitoring and oversight.

<u>Recommendation 5:</u> The MECCT in cooperation with the UNDP CO should consider participation of WAMCO and FENAKA in the meetings of the Project Steering Committee for more effective project monitoring and oversight.

<u>Conclusion 6:</u> The work on drafting of economic instruments and incentives for supporting enforcement of environmentally sound POPs management has not started. Due to the complex nature of this issue and lack of in-country experience with it, the duration of the consultative and drafting processes could last well beyond the remaining duration of the project.

<u>Recommendation 6:</u> The PMU in cooperation with MECCT should critically assess feasibility of the work on development of economic instruments and incentives for POPs management under the current project.

<u>Conclusion 7:</u> Formulation of subsidiary regulations is dependent on adoption and promulgation of the HCM Act. The legislative process is out of direct control of the project team but should be coordinated with preparations for drafting subsidiary regulations under the Act.

<u>Recommendation 7:</u> The PMU should actively monitor the legislative approval process for the HCM Act and eventually advance consultations for drafting of subsidiary regulations.

<u>Conclusion 8</u>: Absence of technical guidelines for handling and transport the PCBcontaminated equipment create environmental and health risks from leakage during packaging and in-country transport.

<u>Recommendation 8:</u> The PMU should ensure that the CTA accelerates the work on development of technical guidelines for handling and transport of PCB equipment including provision of related training.

<u>Conclusion 9</u>: Administration of the micro-grants scheme for demonstration of the 3R principle in waste management is planned to be conducted solely under auspices of the MECCT. Inclusion of WAMCO in this process will enable better evaluation of technical quality of proposals.

<u>Recommendation 9:</u> The PMU in cooperation with the MECCT should consider involvement of WAMCO in the administration of the micro-grant scheme.

<u>Conclusion 10:</u> The project has successfully updated the Gender Action Plan, but its implementation focused solely on equal participation of men and women (GAP Objective 1). Additional gender focused activities will be required for data and information collection on equity of benefits by men and women (GAP Objective 2).

<u>Recommendation 10:</u> The UNDP CO should ensure further capacitation of the PMU and the PSC related to data and information collection on equity of benefits by men and women (GAP Objective 2) and development of adequate reporting tools.

<u>Conclusion 11:</u> The project has produced several products for public awareness but there is no concrete plan how to reach the target beneficiaries. More targeted public awareness approach towards the ultimate project beneficiaries contribute to better understanding of health and environmental impacts of PCB and u-POPs releases.

<u>Recommendation 11:</u> The PMU with support from the UNDP M&E focal point should develop a Stakeholder Communication and Knowledge Management Plan for the project and periodically track and report on the results of implementation of the Plan.

<u>Conclusion 12</u>: There are two investment projects related to waste management implemented by the MECCT in parallel with the current project and therefore constitute important partnerships for the project with substantial amounts of co-financing pledged by the partner projects. Collection and sharing of information about the parallel projects contribute to better synergies in implementation.

<u>Recommendation 12:</u> The PMU should systematically collect information on implementation of the parallel projects on waste management including co-financing contributions for reporting to the Project Steering Committee and in annual Project Implementation Reports.

<u>Conclusion 13:</u> The MTR observed several cases of adaptive management in terms of changing the planned project activities. However, the changes were not presented to the PSC in a systematic manner.

<u>Recommendation 13:</u> The UNDP CO in cooperation with the MECCT should ensure that all changes in the planned project activities are discussed and formally approved by the Project Steering Committee.

<u>Conclusion 14</u>: Review and rating of the project risks has not been made in a systematic manner according to the valid UNDP policies. Systematic risks assessment facilitates identification of risks that require a priority treatment in order to avoid impediments in project implementation.

<u>Recommendation 14:</u> The UNDP CO should assist the PMU in a periodic review of the project risks for recording in the risk register and reporting to the Project Steering Committee.

<u>Conclusion 15:</u> The project organised capacity building events but there is no information on impact of the events on the trainees.

<u>Recommendation 15:</u> The PMU should ensure that evaluation of the training workshops is conducted and included in the training workshop reports.

Measure	MTR Rating	Achievement Description
Project Strategy/	N/A	Project design consistent with the Maldives SAP 2019-2023 and with
Project Formulation	Stakeholder Participation	priority areas of the NIP under the Stockholm Convention,
	Rating: N.A.	It is aligned Programmes 1 and 3 of the GEF-6 Chemicals and Waste
		Focal Area
		Definition of the Project Objective, outcomes, and outputs clear,
		majority of indicators and their targets suitable for measurement of
		progress to achievement of the planned results
		Few indicators/targets found not in line with the SMART criteria
Progress Towards	Objective	No progress on development of economic instruments,
Results	Achievement Rating: MU	no data available on assessment of progress on direct beneficiaries
	0	affected by the project
	Outcome 1.1	Draft Hazardous Chemicals Management Act prepared and validated
	Achievement Rating: S	approval
		11
	Outcome 1.2	Work on upgrade of the on-line MAKUDI portal in progress
	Achievement Rating: MS	Work in progress on development of capacity building programme for
		regulatory and technical stakeholders
	Outcome 2.1	Up to 30 tonnes of PCB safeguarded at temporary storage
	Achievement Rating: S	Design of the interim HW storage facility completed
		Construction of the interim HW storage facility in progress
		Tender for procurement of services for packaging shipment and
	Outcome 2.2	Easibility study for establishment of HWCM at Thilafushi completed
	Achievement Rating: MS	Concept paper for administration f micro-grants scheme for reduction
		and separation of waste streams
	Outcome 3	Updated Gender Action Plan and train-the trainers workshop
	Achievement Rating: MS	10 public awareness materials posted at the MECCT website
Project	Overall rating: MS	Management arrangements – MS
Implementation &		Work planning – S
Adaptive		Monitoring and evaluation – S
Management		Identification and management of risks - MS
		Finance and co-finance – S
		Stakeholder engagement – MS
		Reporting and communication - MS
Sustainability	Overall rating: ML	Institutional and governance sustainability - L
		Financial sustainability – L
		Socio-economic sustainability - ML
		Environmental sustainability - ML

MTR Ratings & Achievement Summary

3.4.5. Lessons learned

The experience from implementation of the projects shows that the baseline data compiled during the project preparatory phase was incomplete. Filling of gaps in the baseline data during the first years of implementation prove that few indicators and related EOP targets are not realistic. The takeaway lesson is that in case of incomplete baseline data it is desirable to revise the results' targets as early as possible in the project implementation. More complete baseline data and other information on actual realities on the ground and changed external conditions ensure revision of the indicators and targets to make them more realistic and attainable.

Legislative procedure for adoption of new or revised national laws requires considerable time. Indicators and targets related to such procedure are outside the control of the project and therefore carry a high risk of non-achievement within the 5-year lifetime of the project. Inclusion of such indicators and targets in the project frameworks should be carefully considered and eventually avoided to the extent possible.

Inter-institutional coordination and collaboration ensured by the Project Steering Committee is critical for overall project oversight as well as for development of strategic partnerships, donor relations and resource mobilization. However, the PSC is less suitable for addressing technical issues as the PSC member institutions are usually represented at a more political level. A separate body such as a Technical Advisory Committee is more suitable for this purpose as it has more technical representation of its member institutions and ensures participatory approach to technical solutions through coordinated action of various institutions dealing with different aspects of the same subject.

Establishment of TAC also enables wider participation of stakeholders that for different reasons cannot be represented at the PSC and ensures thus greater awareness and visibility of the project among secondary (tangential) stakeholders.

An effective M&E system is a necessary condition for identification of bottlenecks in the project implementation, documentation of accumulated experience and dissemination of lessons learned. It also ensures regular and timely collection and analysis of relevant progress and performance information regular for real-time evidence-based decision-making.

Engagement of an experienced Chief Technical Advisor has been critical for implementation of the project as the Maldives has insufficient and limited national expertise with POPs waste management. The CTA has particularly important role for ensuring quality control of outputs and mentoring of the PMU.

A proper consideration of selection criteria in the ToR is critical in the process of procurement of goods and services, particularly when local expertise availability is limited. Inadequate assessment of procurement needs cause procurement delays due to lack of qualified suppliers to deliver required goods and experts to conduct the required work. For particular critical procurement events, it might be appropriate to conduct a separate risk assessment with the aim to identify procurement hindrances and establishment of adequate risk-treatment measures.

ANNEX 1: UNDP-GEF MIDTERM REVIEW TERMS OF REFERENCE

https://jobs.undp.org/cj_view_job.cfm?cur_job_id=106560

ANNEX 2: EVALUATION MATRIX

Evaluation Criteria	Evaluation Questions	Indicators	Data Sources	Data Collection Methods
Project Strategy (Relevance)	Are the project's objectives and outcomes or components clear, practical, and feasible within its time frame? Does the progress so far indicate that the project could in the future catalyse beneficial development effects that could be included in the project results framework and monitored on an annual basis? Are broader development and gender aspects of the project being monitored effectively? Develop and recommend SMART 'development' indicators, including sex-disaggregated indicators and indicators that capture development benefits []] How relevant is the project strategy to address the country priorities? Is the project in line with the national sector development priorities and plans? To what extent were perspectives of those affected by project decisions and of those who could affect the outcomes, taken into account during project design processes? Does the project strategy provide an effective route towards expected/intended results? To what extent were lessons learned from other relevant projects incorporated into the project design? Are the underlying assumptions for the problem addressed by the project still valid?	Project activities in line with the country development and sectoral priorities and plans Activities produce outputs according to the project logframe Lessons learned from previous projects taken into account for implementation Assumptions and risks identified are effectively managed	UNDP programme/project documents UNDP programme/project Annual Work Plans Programmes/projects/ thematic areas evaluation reports Government's national planning documents Human Development Reports SDG progress reports Government partners progress reports Interviews with beneficiaries UNDP staff Development partners (UN agencies, bilateral development agencies) Government partners involved in specific results/thematic areas Concerned NGO partners Concerned associations and federations	Desk reviews of secondary data Interviews with government partners Interviews with NGOs partners/service providers Interviews with funding agencies and other UNCT Interviews with UNDP staff, development partners and government partners, NGO partners, associations, and federations
Progress Towards Results (Effectiveness)	Which are the aspects of the project that have already been successful and how the project can further expand these benefits? How does the GEF Tracking Tool at the Baseline compare with the GEF TT completed before the Midterm Review? How far has the regional context been taken into consideration while selecting the project/ programme? Was there any partnership strategy in place for implementation of the project and if so how effective was it?	GEF TT used as project management instrument The project has partnership strategy and actions taken to promote cooperation between partners	Project/programme/thematic areas evaluation reports Progress reports on projects UNDP staff Development partners Government partners Beneficiaries Progress reports on projects Programme documents Annual Work Plans/Progress Reports Evaluation reports MDG/Human Development Reports	Desk reviews of secondary data Interviews with government partners, development partners, UNDP staff, civil society partners, associations, and federations
Project Implementation &	Has the project or programme been implemented within the original timeframe and budget? To what extent the work-planning processes are results-based? To what extent has the project's results framework/logframe been used as a management tool and were there any changes to it since the project start?	Project implementation within the original timeframe and budget Annual workplans elaborated according to the logframe Implementation issues solved by PMU/UNDP	Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit)	Desk reviews of secondary data Interviews with government partners and development partners

Evaluation Criteria	Evaluation Questions	Indicators	Data Sources	Data Collection Methods
Adaptive Management	Have UNDP and the PMU taken prompt actions to solve implementation issues?	Implementation monitoring tools in place and effectively used		
(Efficiency)	Have there been any delays in project start-up and implementation and if so what were the causes and how they have been solved?			
	What mechanisms does UNDP have in place to monitor implementation? Are these effective?			
	Have there been any outside factors (e.g. political instability) affecting on implementation effectiveness?			
	To what extent financial controls have been established that allow the project management to make informed decisions regarding the budget at any time and allow for the timely flow of funds?	Financial controls established and	Programme documents Annual Work Plans	
	Has there been over-expenditure or under-expenditure on the project?	used to provide feedback on implementation	Annual Progress Reports Evaluation reports	Desk reviews of secondary data Interviews with government partners
	Were the resources focused on the set of activities that were expected to produce significant results?	Activities prioritized for achievement of significant results	Government partners Development partners UNDP staff (Programme Implementation	and development partners
	Were the project resources concentrated on the most important initiatives or were they scattered/spread thinly across initiatives?	-	Support Unit)	
	Have changes been made and are they effective? Are the existing responsibilities and reporting lines clear? To what extent is decision-making in the project transparent and undertaken in a timely manner?	Decision-making on implementation transparent and timely Implementation of components with multiple responsible partners clear and timely	Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit)	Desk reviews of secondary data Interviews with government partners and development partners
Project Implementation & Adaptive Management	Has the project developed and leveraged partnerships with direct and tangential stakeholders? Do the stakeholders have roles in project decision-making that support efficient and effective project implementation? To which extent has stakeholder involvement and public awareness contributed to the progress towards achievement of project objectives and are there any limitations to stakeholder awareness of project outcomes/ participation in project activities?	Mechanisms for involvement of other stakeholders in place Other stakeholders aware of the project and involved in implementation	Programme documents Annual Work Plans Annual Progress Reports	Desk reviews of secondary data
(Efficiency) - continued	How the Project Team and partners undertake and fulfill the GEF reporting requirements? To what extent have lessons derived from the adaptive management process been documented, shared with and internalized by key partners and incorporated into project implementation? Have the PIRs been shared with the Project Board and other key stakeholders?	Quality reporting according to GEF reporting requirements Lessons for adaptive management documented and taken into account for implementation	Evaluation reports Progress reports UNDP programme staff	Desk reviews of secondary data Interview UNDP programme staff
	How regular and effective has been the internal project communication with project stakeholders?	Quality and effectiveness of internal communication Possibilities for additional communication material identified	Evaluation reports Progress reports UNDP programme staff	Desk reviews of secondary data Interview UNDP programme staff

Evaluation Criteria	Evaluation Questions	Indicators	Data Sources	Data Collection Methods
	Are there any ways of external communication established to inform about the project progress the public? Are there any aspects of the project that might yield excellent communications material as additional project output?			
	What is the likelihood of financial and economic resources not being available once the GEF assistance ends? To what extent financial and economic instruments and mechanisms have been established or will be established to ensure the ongoing flow of benefits once the GEF assistance ends? What additional factors are needed to create an enabling environment for continued financing?	Existence of counterpart/stakeholder funding for the project outcomes Additional factors for continued financing identified	Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit)	Desk reviews of secondary data Interviews with government partners and development partners
Sustainability and progress to impact	Has the project put in place frameworks, policies, governance structures and processes that will create mechanisms for institutional and technical knowledge transfer after the project's closure? To what extent has the project been developing institutional capacity (systems, structures, staff, expertise, etc.) that will be self-sufficient after the project closure date? Has the project achieved stakeholders' consensus regarding courses of action after the project's closure?	Institutional frameworks for continuation of activities established Level of self-sufficiency of the established institutional frameworks	Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit)	Desk reviews of secondary data Interviews with government partners and development partners
	Are there any social or political risks that may jeopardize sustainability of project outcomes? Are there any environmental factors that could undermine and reverse the project's outcomes, including factors that have been identified by project stakeholders? What is the risk that the level of stakeholder ownership (including ownership by governments and other key stakeholders) will be insufficient to allow for the project outcomes/benefits to be sustained? Is there sufficient public/ stakeholder awareness in support of the objectives of the project?	Social, political and environmental risks identified and taken into account Level of stakeholder awareness and ownership of the project results	Programme documents Annual Work Plans Annual Progress Reports Evaluation reports Government partners Development partners UNDP staff (Programme Implementation Support Unit)	Desk reviews of secondary data Interviews with government partners and development partners

SAMPLE QUESTIONS RELATING TO THE PROMOTION OF UN VALUES FROM A HUMAN DEVELOPMENT PERSPECTIVE				
Evaluation Criteria	Evaluation Questions	Indicators	Data Sources	Data Collection Methods
Supporting policy dialogue on human development issues	To what extent does the initiative support the government in monitoring achievement of MDGs? What assistance has the initiative provided supported the government in promoting human development approach and monitoring MDGs? Comment on how effective this support has been.	Level of contribution of the project to the achievement of MDGs	Project documents Evaluation reports HDR reports MDG reports National Planning Commission Ministry of Finance	Desk review of secondary data Interviews with government partners
Contribution to gender equality	To what extent was the UNDP initiative designed to appropriately incorporate in each outcome area contributions to attainment of gender equality? To what extent did UNDP support positive changes in terms of gender equality and were there any unintended effects? Provide example(s) of how the initiative contributes to gender equality. Can results of the programme be disaggregated by sex?	Level of monitoring of gender related issues	Project documents Evaluation reports UNDP staff Government partners Beneficiaries	Desk review of secondary data Interviews with UNDP staff and government partners Observations from field visits
Addressing equity issues (social inclusion)	To what extent does the project take into account the needs of vulnerable and disadvantaged to promote social equity, for example, women, youth, disabled persons? Provide example(s) of how the initiative takes into account the needs of vulnerable and dis- advantaged groups, for example, women, youth, disabled persons. How has UNDP programmed social inclusion into the initiative?	Level of monitoring of social inclusion related issues	Project documents Evaluation reports UNDP staff Government partners Beneficiaries	Desk review of secondary data Interviews with UNDP staff and government partners Observations from field visits

ANNEX 3: LIST OF PERSONS INTERVIEWED

Name and position	Institution	Role in the project
Fizan Ahmed, Programme Associate Vathanya Vichitlekarn, Planning, M&E and RBM Analyst	UNDP CO	Project Implementing Agency / QA
Aysha Solih, Programme Officer/ Acting Assistant Resident Representative (Resilience and Climate Change)		
Jie Pan, Regional Technical Specialist	UNDP BRH	Project RTA
Miruza Mohamed, Director, Environment Management and Conservation Department	MECCT	National Project Director
Hassan Azhar	PMU/MECCT	Project Manager
Mahmut Osmanbasoglu	UNDP CO	Chief Technical Advisor
Musab Sabree, Assistant Engineer	Environment Protection Agency	PSC member
Ziduna Mohamed, Director, Chemical Management Section	Ministry of Defence	PSC member
Rifaath Ali Jaleel	Fenaka Corporation Ltd.	Stakeholder
Ahmed Shafiu +3	Waste Management Corporation	Stakeholder
Ali Nooradheen	Nooradheen Investment	Contractor for Interim storage facility
Aminath Nuzuha	Addu City Council	Project beneficiary

ANNEX 4: LIST OF DOCUMENTS CONSULTED

- 1. Eliminating POPs through Sound Management of Chemicals, GEF-6 Project Identification Form, UNDP, 2017
- 2. Eliminating POPs through Sound Management of Chemicals, GEF-6 Project Document, UNDP, 2019
- 3. Eliminating POPs through Sound Management of Chemicals, Report from the Inception Workshop, UNDP, 2020
- 4. Eliminating POPs through Sound Management of Chemicals, Project Implementation Reports, UNDP, 2021 and 2022
- 5. Eliminating POPs through Sound Management of Chemicals, Project Combined Delivery Reports, UNDP, 2020, 2021, 2022
- 6. Eliminating POPs through Sound Management of Chemicals, Minutes of the Project Steering Committee, 2020 and 2021
- 7. Status of ratification of the Stockholm, Basel and Rotterdam Conventions, http://chm.pops.int
- 8. ISLANDS Indian Ocean Child Project, Project Document, UNDP/GEF, 2022
- 9. A Regional Waste Management Strategy and Action Plan, Ministry of Environment, 2019
- 10. National Implementation Plan to the Stockholm Convention on Persistent Organic Pollutants, Ministry of Environment and Energy, 2016
- 11. Workshop Report: Drafting an Overarching Chemicals Management Bill for Maldives, Azur Chambers LLP, 2022
- 12. Feasibility Study for Establishment of Hazardous Wastes and Chemicals Management System in The Greater Male' Region, Fichtner Consultancy for MECCT, 2021
- 13. Concept paper on the 3R microgrants scheme, MECCT, 2022
- Development of a Gender Action Plan for Eliminating Persistent Organic Pollutants through Sound Management of Chemicals Project, Training Workshop Report, MECCT, 2021
- 15. Training Workshop on ESMF, GRM and ESMP of Eliminating POPs through Sound Management of Chemicals Project, MECCT, 2021
- 16. Inventory of Municipal Waste-related Sources of PCDD/F, CTA Report, 2022
- 17. Guidance for Conducting Midterm Reviews of UNDP-supported, GEF-financed Projects UNDP-GEF, 2014
- 18. The GEF Monitoring and Evaluation Policy, GEF Evaluation Office, 2010
- 19. UNDP Evaluation Guidelines, UNDP, 2019 and June 2021 update
- 20. Guideline on evaluations during COVID-19, UNDP, 2020
- 21. Glossary of Key Terms in Evaluation and Results Based Management, OECD, 2010
- 22. Integrating Human Rights and Gender Equality in Evaluations, UNEG, 2014
- 23. The Gender Results Effectiveness Scale (GRES): A Methodology Guidance Note, UNDP IEO (2013)
- 24. Guidance Note on Social and Environmental Standards (SES) Procedure, UNDP, 2019
- 25. Ethical Guidelines for Evaluations, UNEG, 2020

ANNEX 5: PROJECT STAKEHOLDER MAP

Stakeholder Organization	Role
Institutional Stakeholders	
Ministry of Defence and National Security (MDNS)	The MDNS regulates, amongst others, the import of dangerous chemicals into the country. Article 5 of the Act No. 4/75 states that all dangerous chemicals (except for fireworks), acids, and other poisonous items produced using these chemicals can only be imported into the country with written permission from the ministry and in accordance with such rules and regulations set out by the ministry. MDNS is also obliged by the CWC to monitor/control the flow of chemicals that are categorized as chemical weapons.
The Maldives National Defence Force (MNDF)	Pursuant to Article 11 of Law 4/75, the final disposal of chemicals is the responsibility of the Ministry of Defence and National Security. The Ministry has assigned the Maldives National Defence Force (MNDF) to carry out this function on its behalf. At the point of customs clearance, the Maldives Customs Service and the Maldives National Defence Force will check/verify if chemicals have been issued a permit by the Ministry of Defence and National Security, before advantage imparts are cleared or moted.
The Maldives Customs Service (MCS)	The MCS ensures that the regulations regarding the import of chemicals into the country are met and fulfilled. As an implementing authority, MCS: - verifies chemicals imported into the country, - authorizes for importation, - withholds any chemicals without such authorization, - discards it if required with consultation from key relevant institutions
Ministry of Environment and Energy (MEE)	MEE is responsible for the management and guidance of control of environmental hazards caused by chemicals such as HCFCs and HCFC blends by formulating a guideline to reduce and limit the import, use and sales and phasing it out completely by 2020. MEE further extends its mandate to the disposal of wastes in the country.
Environmental Protection Agency (EPA)	 EPA is the regulatory body assigned to implement and enforce the laws and regulations pertaining to the environmental sector. Among its many responsibilities, the EPA: i) regulates waste management (incl. hazardous waste) and pollution, is responsible for the implementation of waste-and pollution- related regulations, and sets standards and guidelines for pollution prevention and waste management (e.g. each island is required to have a waste management plan); ii) is responsible for the monitoring of air quality and setting up air monitoring mechanisms; iii) reviews and provides clearance of Environmental Impact Assessments as per the Environmental Impact Assessment Regulations, among else.
The Maldives Energy Authority (MEA)	MEA is the regulator and the enforcer of all laws and regulations relevant to utilities.
Ministry of Health (MoH)	The ministry is responsible for ensuring the accessibility of quality health services and establishing policies for protection of public health. The following authorities are formed under MoH to work at the frontline to implement the Public Health Act, Law No. 7/2012.
The Maldives Food and Drug Authority (MFDA)	MFDA is the competent authority for certifying the import and export items of food and drugs.
Health Protection Agency (HPA)	HPA is formed under the Public Health Act Law No. 7/2012 to establish policies for protection of public health and identify the parties responsible for its protection, to define how public health protection policies will be implemented and establish policies to limit basic rights ensured under the Maldives' constitution to Maldivians and people residing in the Maldives to necessary extents to protect public health.
National Drug Agency (NDA)	NDA is the regulatory body assigned to implement the policies related to the Law no. 17/2010 (The law on drugs).
Ministry of Fisheries and Agriculture (MoFA)	MoFA's mandate extends to: - developing standards and regulations related to the import and handling of pesticides and fertilizers. - updating data regarding pesticides and chemical fertilizers (this will be facilitated and systematized by the proposed - project activity "National Chemicals Management Database Development"). - issuing licenses for the import of pesticides and chemical fertilizers.
Ministry of Tourism Arts and Culture	Ministry with oversight on tourism sector and resorts
Ministry of Gender and Family	Government ministry responsible for implementation of Gender Equality Law
Male' City Council	Provides technical as well as policy level inputs during the project's development- as well as implementation- stage.
The Maldives Transport Authority	Provides technical and policy inputs and information during the planning and design of the Project Document.
National Bureau of Statistics Local Government Authority	Maintains data and statistical database of the country. Provides technical inputs during the planning and design of the project document as well as during the project's implementation. As per the Decentralization Act (7/2010), Atoll Councils, Island Councils and City Councils have the responsibility to plan and implement projects related to development of the island.
City Councils, Atoll Councils, and Island Councils	Mandated with management and overall administrative functions of the City/Atoll/Island. They are also functional in implementation and enforcement of laws and regulations.
National Chemical Management Committee (NCMC)	The mandate of the NCMC includes, but not limited to; And is made up of - Ministry of Environment and Energy; - The Maldives Police Service; - The Maldives National Defence Force; - The Maldives Customs Service; - The Maldives National University; - Transport Authority; - Ministry of Defence and National Security; - Health Protection Agency; - Ministry of Gender and Family - Environmental Protection Agency; - Ministry of Gender and Acriculturate

Stakeholder Organization	Role
8	- The Maldives Food and Drug Authority;
	- Male' City Council
	- FENAKA Corporation Ltd:
	- Civil society representatives
Principle Industrial/Private Sector Stakeholders	
Waste Management Corporation	The Waste Management Corporation (WAMCO) established in September 2015 is responsible for waste
(WAMCO)	management across the country. WAMCO's objectives are to:
	- Provide a practical and environmentally responsible and sustainable solid waste collection service for Maldivian
	communities.
	- Operate a cost-effective waste transportation system between designated waste collection points and waste
	processing/ disposal facilities.
	- Promote and create awareness on best practices in waste management that can be adapted in Maldivian
	communities.
	- Assess and develop environmentally accountable and economically viable waste recycling, processing, treatment
	and disposal systems.
Potential PCB Holders/Utility Providers	State owned companies;
(e.g. STELCO; FENAKA Corporation	Own and are responsible for the sound management, maintenance and phase-out of potentially PCB containing
Ltd; City/island councils)	electrical equipment.
The Maldives Association of	MACI is the standard bearer of the second largest industry in the Maldives. One of the primary roles of MACI
Construction Industry (MACI)	includes interests of the contractors, laborers, employers, employees, technical and support staff, including but not
	limited to the collaborating commercial and market interests of the construction industry, and to generate public
	awareness for these interests both within the government and among
	Stakeholder Engagement Plan 6 the general public.
Local level businesses (eg. small waste	These represent the first step in waste management, and their current role, and future role in the enhanced waste
haulers, collectors, separators, island	management structure is critical. Attention to ensuring their livelihoods are enhanced, or at least maintained, has been
community members of the informal	recognized in the SESP, and will be explored in the ESIA, with appropriate planning reflected in the ESMP to be
waste sector).	developed at the start of implementation.
General public and Local Community	This stakeholder needs to be engaged both from the standpoint as generators of some categories of waste, as well as
Members	potential handlers and/or subjects of exposure of releases. Therefore, their engagement is critical.
Academic Institutions	
The Maldives National University	The first government tertiary institution in the Maldives provides an undergraduate program in Environmental
(MNU) ** THERE MAY BE GENDER	Management, which was initiated and funded by the MEMP World Bank/MoEE project. This program offers studies
AND SCIENCE EXPERTISE AT MNU	in environmental chemistry and waste management including pollution prevention.
Civil society / Non-Governmental Organizations	
Blue peace* (representing CSOs) /Save	Active NGOs can play a vital role to increase awareness on waste management and chemicals related issues among
the beach	the general public. They can also conduct environmental education and provide training related to environmental
	protection.
The Women's Development	Each inhabited island has a Women's Development Committee. As of 2012 there were 186. They are created by
Committees* (WDCs)	statute. These committees can provide inputs to ensure the engagement and participation of women throughout the
	project's development as well as its implementation.
EcoCare	An NGO that works on environmental protection and sustainable development and has expertise on gender and
	working with the WDCs.
Hope for Women	An NGO that works across the sectors in the Maldives on all aspects of women's empowerment and gender equality.
Voice of Women	A national NGO focused on women's rights in the Maldives.
Parley	An international NGO with a plastic bottle recycling program in the Maldives where recycling should be the
	alternative to burning plastic.
ANNEX 6: MTR RATING SCALES

Rati	Ratings for Progress Towards Results: (one rating for each outcome and for the objective)						
6	Highly Satisfactory (HS)	The objective/outcome is expected to achieve or exceed all its end-of-project targets, without major shortcomings. The progress towards the objective/outcome can be presented as "good practice".					
5	Satisfactory (S)	The objective/outcome is expected to achieve most of its end-of-project targets, with only minor shortcomings.					
4	Moderately Satisfactory (MS)	The objective/outcome is expected to achieve most of its end-of-project targets but with significant shortcomings.					
3	Moderately Unsatisfactory (MU)	The objective/outcome is expected to achieve its end-of-project targets with major shortcomings.					
2	Unsatisfactory (U)	The objective/outcome is expected not to achieve most of its end-of-project targets.					
1	Highly Unsatisfactory (HU)	The objective/outcome has failed to achieve its midterm targets and is not expected to achieve any of its end-of-project targets.					
Rat	ings for Project Implementation &	Adaptive Management: (one overall rating)					
6	Highly Satisfactory (HS)	Implementation of all seven components – management arrangements, work planning, finance and co-finance, project-level monitoring and evaluation systems, stakeholder engagement, reporting, and communications – is leading to efficient and effective project implementation and adaptive management. The project can be presented as "good practice".					
5	Satisfactory (S)	Implementation of most of the seven components is leading to efficient and effective project implementation and adaptive management except for only few that are subject to remedial action.					
4	Moderately Satisfactory (MS)	Implementation of some of the seven components is leading to efficient and effective project implementation and adaptive management, with some components requiring remedial action.					
3	Moderately Unsatisfactory (MU)	Implementation of some of the seven components is not leading to efficient and effective project implementation and adaptive, with most components requiring remedial action.					
2	Unsatisfactory (U)	Implementation of most of the seven components is not leading to efficient and effective project implementation and adaptive management.					
1	Highly Unsatisfactory (HU)	Implementation of none of the seven components is leading to efficient and effective project implementation and adaptive management.					
Rati	ings for Sustainability: (one overall	rating)					
4	Likely (L)	Negligible risks to sustainability, with key outcomes on track to be achieved by the project's closure and expected to continue into the foreseeable future					
3	Moderately Likely (ML)	Moderate risks, but expectations that at least some outcomes will be sustained due to the progress towards results on outcomes at the Midterm Review					
2	Moderately Unlikely (MU)	Significant risk that key outcomes will not carry on after project closure, although some outputs and activities should carry on					
1	Unlikely (U)	Severe risks that project outcomes as well as key outputs will not be sustained					

Result	Objective and Outcome Indicators	Baseline	Mid-term Target	EOP 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 labelling	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 instrument 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
sound collection, labelling, storage, and disposal of hazardous chemicals and waste	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
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	start to occur in year 4 of the project 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 staft trained. Assumptions: The project will ensure that the current draft chemicals regulation will be finalized and approved

ANNEX 7: PROJECT RESULTS MATRIX

Result	Objective and Outcome Indicators	Baseline	Mid-term Target	EOP Target	Data Collection Methods and Risks/Assumptions
	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 stakeholders. Although all POPs, except PCBs, listed under the SC are officially banned in the the Maldives it is not tied to any legislative norm and enforcement and proper monitoring procedures	At least 2 regulatory pertaining to POPs and SMC one national guideline on integrated waste management and 2 regional guidelines drafted	At least 2 regulatory pertaining 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
Component/ Outcome 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 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
	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	Goal of 2025 and 2028 on PCBs • 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 wast management centers not reached during project implementation Mitigation is

Result	Objective and Outcome Indicators	Baseline	Mid-term Target	EOP Target	Data Collection Methods and Risks/Assumptions
					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 sound handling of hazardous waste	At least 224 jobs (20% female, 80% men) create to ensure environmentally sound handling of hazardus waste	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 total number of people trained Assumptions: Pilot demonstration can show the oot howsfits form words concertion and recording 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.

Result	Objective and Outcome	Baseline	Mid-term Target	EOP Target	Data Collection Methods and Risks/Assumptions
	Indicators				
					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/pro ject 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/projec t 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; the 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

ANNEX 8: CONSULTANTS' AGREEMENT FORMS

Agreement to abide by the Code of Conduct for Evaluation in the UN System

Evaluators:

- 1. Must present information that is complete and fair in its assessment of strengths and weaknesses so that decisions or actions taken are well founded.
- 2. Must disclose the full set of evaluation findings along with information on their limitations and have this accessible to all affected by the evaluation with expressed legal rights to receive results.
- 3. Should protect the anonymity and confidentiality of individual informants. They should provide maximum notice, minimize demands on time, and respect people's right not to engage. Evaluators must respect people's right to provide information in confidence and must ensure that sensitive information cannot be traced to its source. Evaluators are not expected to evaluate individuals and must balance an evaluation of management functions with this general principle.
- 4. Sometimes uncover evidence of wrongdoing while conducting evaluations. Such cases must be reported discreetly to the appropriate investigative body. Evaluators should consult with other relevant oversight entities when there is any doubt about if and how issues should be reported.
- 5. Should be sensitive to beliefs, manners and customs and act with integrity and honesty in their relations with all stakeholders. In line with the UN Universal Declaration of Human Rights, evaluators must be sensitive to and address issues of discrimination and gender equality. They should avoid offending the dignity and self-respect of those persons with whom they come in contact in the course of the evaluation. Knowing that evaluation might negatively affect the interests of some stakeholders, evaluators should conduct the evaluation and communicate its purpose and results in a way that clearly respects the stakeholders' dignity and self-worth.
- 6. Are responsible for their performance and their product(s). They are responsible for the clear, accurate and fair written and/or oral presentation of study imitations, findings and recommendations.
- 7. Should reflect sound accounting procedures and be prudent in using the resources of the evaluation.

Name of Consultant: Dalibor Kysela

Name of Consultancy Organization (where relevant):

DocuSigned by:

Dalibor kysela 70AD800B99C345F....

I confirm that I have received and understood and will abide by the United Nations Code of Conduct for Evaluation.

Signed at Vienna Date

Date: 30-0ct-2022

Signature:

N/A

Agreement to abide by the Code of Conduct for Evaluation in the UN System

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- 6. Are responsible for their performance and their product(s). They are responsible for the clear, accurate and fair written and/or oral presentation of study imitations, findings and recommendations.
- 7. Should reflect sound accounting procedures and be prudent in using the resources of the evaluation.

Name of Consultant: Ahmed Aslam

N/A

Name of Consultancy Organization (where relevant):

I confirm that I have received and understood and will abide by the United Nations Code of Conduct for Evaluation.

Signed at Malé Date: 30-0ct-2022

	DocuSigned by:
Signature:	4650A46FB1104D3

ANNEX 9: AUDIT TRAIL (SUBMITTED AS SEPARATE ANNEX)

ANNEX 9 AUDIT TRAIL

To the comments received on

the Midterm Review of the project Eliminating POPs through Sound Management of Chemicals

The following comments were provided in track changes to the draft Midterm Review report; they are referenced by institution ("Author" column) and track change comment number (# column)

#	Author	Para No./ comment location	Comment/Feedback on the draft MTR report	MTR team response and actions taken
1.	RTA	Synopsis	Overlapping project information table	Accepted and Synopsis deleted. However, the insertion of Synopsis was based on experience of the MTR lead consultant from another MTR when the QARE unit in BRH requested to insert the Synopsis into the report
2	RTA	Synopsis	Original closing date	Not relevant as Synopsis was deleted
3.	RTA	Executive summary P.i	Question on the co-financing realized	No action taken. The figures are based on progress and financial reports from the parallel projects
4.	RTA	Project summary P.ii	That interim storage site is still under construction.	No action taken. The PCB equipment has been temporarily safeguarded before the construction of the interim storage.
5.	UNDP	Project Progress Summary p. iii top	Question about gender component/integration of awareness materials	Partially accepted but information of the gender aspects of the awareness materials not necessary for the Executive Summary
6.	UNDP	Summary of Conclusions p. iv top	Several comments on positive-negative balance, chronology, etc.	Accepted and text revised
7.	UNDP	Summary of Conclusions p. iv bottom	Impact of new administrative GoM procurement procedures	Accepted and the reference to new administrative procurement procedures deleted as it is not needed in the Executive Summary. However, it is kept in the in Conclusion 1 on p. 47.
8.	RTA	Concise summary of conclusions P.iv	To start with positive aspects; also to provide suggestions	Accepted. Although positive aspects are listed under the project progress summary, a summary of positive aspects inserted in this section.
9.	RTA	Concise summary of conclusions P.iv	To provide a summary in a chronological order	Accepted and text of the section modified
10	RTA	Concise summary of conclusions P.iv	Meaning, most indicators are realistic and specific? Positive tone? Suggest refining it to make it clearer.	Accepted and text revised
11	RTA	Concise summary of conclusions P.iv	Involvement of tangential stakeholders in monitoring and oversight	Accepted and text corrected
12	RTA	Concise summary of conclusions P.v	Does the project plan to develop such guidelines? Suggest providing more context to these bullet points. If this is the issue, what recommendations the MRT is making? It's not only-issue finding, most importantly, it's about providing suggestions and recommendations that can help project meet end of project objectives.	No action taken. There is a recommendation addressing that.
13	UNDP	Summary of Conclusions p. v bottom	Dissemination plan for awareness materials	No action taken. There is a recommendation addressing that.

#	Author	Para No./ comment location	Comment/Feedback on the draft MTR report	MTR team response and actions taken
14	UNDP	Summary of Conclusions p. v bottom	Evaluation of impact of training	No action taken. There is a recommendation addressing that.
15	UNDP + RTA	Recommendation summary table P.vi	Several comments made here and in the section Conclusion and Recommendations	Accepted and recommendations modified
16	RTA	Recommendation summary table P.vi	Follow or "Follow up"?? This is a very important distinction, because "follow" indicates that they did NOT follow government legislative approval process, this is a MAJOR (borderline) accusation, for which we need to have ample evidence.	Accepted and wording changed to avoid ambiguity
17	RTA	Recommendation summary table P.vi	What "scheme"? Why is this? As mentioned above, please use the above section as an opportunity to lay down the context for these recommendations, along with positive lessons learned under the project. Both the good and the not-so-good!	Accepted. As above stated, the conclusion summary was amended
18	RTA	Recommendation summary table P.vi	You meant" cofinancing projects"? If so, I agree with you. But if it's co-financing, this recommendation repeats with No. 13.	Accepted and recommendation 12 modified
19	UNDP	Recommendation Summary Table p. vi	Recommendations on quality of activities	No action taken.
20	UNDP	Recommendation Summary Table R#2	Procurement of PCB packaging and export	Accepted and the recommendation modified
21	UNDP	Recommendation Summary Table R#5	Conflict of interest	Noted but the recommendation maintained
22	UNDP	Recommendation Summary Table R#6	Gender lens on economic instruments	No action taken as elaboration of economic instruments is by default gender neutral
23	UNDP	Recommendation Summary Table R#8	CTA support	Accepted and recommendation
24	UNDP	MTR Purpose and Objective p. 1	Factor for delay to correlate in the background	No action taken. The commented text is a description of MTR purpose/objective. Assessment of what actually happened is in the Findings section.
25	RTA	Constraints and limitations p.4	Add list of people interviewed	No action taken. The list is already in Annex 3
26	UNDP	Problems that the project will address P.6	Fact check on the Waste Management Regulation	Accepted and text modified including a footnote
27	UNDP	Problems that the project will address P.7	to consider to add a paragraph reflecting on an issue of monitoring	Partially accepted. The commented text describes the baseline situation. The comment is considered for the relevant part of the Finding section.
28	UNDP	Problems that the project will address P.7	Is the Gender Specialist listed in the GAP hired?	No action taken. The commented text describes the baseline situation and not the MTR findings
29	RTA	Project description and strategy p. 7	Numbering of the project aspects	Accepted and numbering replaced by bullet points
30	UNDP	Project implementation arrangements P.9	RTA based in BRH	Accepted and corrected
31	RTA	Box 1 p. 9	Project closing date	No action taken as the information is based on PIMS+
32	UNDP	Project Strategy, project design P.11	Specify the output. Add "output 2.3 Policies, regulatory frameworks	Accepted and the text of the output inserted
33	UNDP	Results Framework/Logframe P.12	component has been mislabeled as outcome. (i.e., the table should only read "component")	No action taken. The review of the PRF is already included in the recommendations.
34	RTA	Results framework / logframe P.12	Comment on revision of the PRF	No action taken. The revision of the PRF is implicitly included in the recommendation on revision of the PRF indicators and targets
35	UNDP	Process towards results P.14	Review of results against GEF tracking tools (TT)	Partially accepted. A sentence inserted about missing TT at MTR
36	RTA	Output 1.1.1 P.16	These are two examples of project delay, un-related to UNDP or Covid. Please reflect all these different reasons up front in the "summary" section where there is one paragraph on "project delays".	No action taken. Text about procurement delays is already in the summary of conclusions

#	Author	Para No./ comment location	Comment/Feedback on the draft MTR report	MTR team response and actions taken
37	RTA	Summary assessment of Outcome 1.1: P.17	Please add one sentence on if the software has been delivered. If not, when will it be?	Partially accepted. Text on status of the software inserted. It is not the purpose of MTR to make predictions.
38	UNDP	Output 1.2.2 P.17	The Utilities Regulatory Authority is not in the abbreviation page. Nor is EPA.	Accepted and EPA and URA added under Abbreviations
39	RTA	Output 1.2.2 P.18	Meaning the "company" hired in Jan. 22. Suggest revising it to make it clearer. When the deliverable is expected? Any difficulties in delivering it?	Accepted and text amended
40	UNDP	Summary assessment of outcome 1.2 P.18	Consider putting summary of assessment in one section rather than mentioning separately	No action taken. The MTR has to assess the individual outcomes separately hence the assessment of each outcome comes after description of outputs
41	UNDP	Summary assessment of outcome 1.2 P.18	The PMU is based in MECCT. PMU has responsibility to seek support of senior officials of MECCT to ensure sufficient progress/address bottlenecks	No action taken. The political approval process is wider than just the MECCT
42	RTA	Output 2.1.1 P.20	The opening chapter says that all PCB- contaminated equipment has been temporarily stored and safeguarded. I made a comment earlier about this. Please verify again with PMU the status on this.	Accepted and clarification inserted
43	RTA	Output 2.1.1 P.20	Highlight an example of a covid related delay	Noted but no action taken
44	RTA	Output 2.1.1 P.20	On the critical role of CTA, for accelerating project implementation.	No action taken as the importance of the CTA is highlighted in the recommendations
45	RTA	Output 2.1.1 P.20	Ditto, as mentioned above, many reasons for delay, so the opening chapter needs to be more complete and balance in attributing reasons for delay (there, UNDP internal procedure was pointed as causes for delay only).	Accepted and text inserted into the Executive Summary (concise summary of conclusions)
46	UNDP	Output 2.1.1 P.21	This is where UNDP internal procedure for quality assurance review came in and delayed the issuance of RfQ.	Noted but no action taken
47	RTA	Output 2.2.1 P.21	In PIR 2022 discussions, PMU mentioned that the plan has changed for the construction of the regional HWMC because the cost (6 million) is much higher than budgeted (2 million). Therefore, this activity was changed into funding small grant to 3R activities (see PIR for detail). BUT, your description says that this activity is still ongoing, combined with ADB funding, to build the HWMC.	Accepted and text modified for greater clarity
48	RTA	Output 2.2.1 P.21	For which one, UNDP -funded one, or ADB activities? Most focus should be on UNDP activities. Was this ADB activity considered as co- financing (realized)?	Accepted and text amended for clarity.
49	RTA	Output 2.2.2 P.21	Support to pilot demonstration in Vandhoo changed to 3R demonstration in Thilafushi RWMF.	Noted but no action taken as the substance of the comment is already in the text
50	RTA	Summary Assessment of Outcome 2.2: P.22	This section has a lot of very good findings and thinking. Can you please translate these findings into Recommendations that help the project steer towards safeguarding the chemicals and reducing toxic substances and waste emission to the environment? My observation is that the Recommendations are very much on how to complete the project on time, very little about how to complete the project while achieving	Noted but no action taken. Several recommendations (e.g. #2, 3, 8) address safeguarding the PCB chemicals and reduce risk of leakage. Other recommendations (e.g., # 6, 7,8, 9) address achievement of quality deliverables from the project. Criticality of baseline data on the project design is included
			the best environmental outcome- that's the end goal of the project while achieving the best environmental outcome- that's the end goal of the project. What about project design? What are the lessons learned so that the next project is developed better?	in the lessons learned section.
51	RTA	Summary Assessment of Outcome 2.2: P.22 paragraph 3	Why was that, a project design issue? Insufficient stakeholder consultation? If we could point towards the root causes, we can avoid it in the future (projects) too.	Accepted and text amended for clarity
52	RTA	Summary Assessment of Outcome 2.2: P.22 Paragraph 4	How was this project initiated/approved? Can you please elaborate on this decision- making process. So that CO can help supervising better and avoid this.	Accepted and text amended

#	Author	Para No./ comment location	Comment/Feedback on the draft MTR report	MTR team response and actions taken
53	RTA	Output 3.1.1 P.25	Can you please write a few paragraphs on how this Output has been implemented	Partially accepted. Statement of no activities on
			In the first two years? Status quo, current practices, so to speak	implementation of the output inserted.
54	RTA	Output 3.1.2 P.25 last paragraph	Please make sure to include how PMU can improve Awareness Raising work in the	No action taken. Recommendation 11 to
			recommendations, similar with other shortfall areas.	prepare a Stakeholder Communication Plan addresses this issue
55	RTA	Summary assessment of progress towards	I remember the PMU says that they plan not to conduct this activity.	Accepted and new Recommendation 13
		the Project Objective:	This falls under earlier comment suggesting that MTR provide a summary of project activities that PMU has changed already plan to change/delete, or add (like	formulated
			the fish sampling activity that should not have been funded by this project).	
56	UNDP	Management arrangements P.29 on the title	Have not seen if in the board UNDP is a co-chair or member. In the latter case it	No action taken. The practice in GEF project
			would be good the evaluator mentioning the practice across GEF project and that we will need to be co-chairs	recipient governments and UNDP with no
				conclusive evidence of impact of UNDP co-
67	UNIDD	M		chairing the PSC
57	UNDP	Management arrangements P.29 towards the final paragraph	RIA change was in early 2021.	Accepted and date corrected
58	UNDP	Below Figure 2 project organizational structure (as in the pro doc) P.30	Clarify that the PM used to be a civil servant (all non-political posts at ministries are that) but he had to go on the sabbatical to join the ministry as a project staff.	Accepted and reference to the Maldivian Civil Service Act inserted as footnote
59	RTA	Below Figure 2 project organizational	Using this paragraph for earlier sections can address comment on including	Accepted and para used in the Executive
(0)	DTA	structure (as in the pro doc) P.30	"Covid-related delays".	Summary
60	RTA	Below Figure 2 project organizational structure (as in the pro doc) P 30 last line	Unclear how this was relevant to CTA contract. Suggest adding one sentence	Accepted and clarification inserted. Modified
		structure (us in the pro doe) 1.50 has the		rating of the section
61	UNDP	Page 31	As explained during our last meeting, this was never the case (as the RTA based in	Accepted and text corrected. Additional para on
			IRH advises on our related GEF-7 project).	separation of RTAs for the POPs and ISLANDS projects inserted.
62	RTA	Table 6: Summary of project risks	Can you please note that this risk register is updated by CO twice a year, so this has	Noted by no action taken. The risk update is
		identified at the project inception P.34	changed by now.	discussed in the text after the table.
63	UNDP	Page 35 Paragraph 4	Consider to include this as a recommendation (in line with UNDP ERM -	Accepted and new Recommendation 14
<u> </u>	CT A	D 25 D 1 A / 1	Enterprise Risk Management).	formulated on risk management
64	CIA	Page 35 Paragraph Accepted	The comment on underrating of risks of absence of economic incentives is true that both risks look a bit underrated	that the probability of the two mentioned risks
				was underrated. Although assistance for
				development of economic instruments is being
				provided under another UNDP project, it is doubtful to what extent it will be applicable to
				POPs. The high-risk rating of PCB leakage
				during transport is based on experience from
65	UNDP	Below table 7 P 36	The latest FSME report was in February 2022. Do you mean it is recommended	other projects in Africa (e.g. Rwanda, Ethiopia).
05	UNDI	Below table 7, 1.50	that the project conducts another one? What should be the timeframe for the ESMF	and related to project implementation risks and
			(e.g. annually, oneat the started of the project, another one after project MTR, etc.)?	not SESP risks.
66	RTA	Below table 7, P.36	Since the project risk is high already, does "imperfect" mean that some risks are	No action taken. The commented text is related
			classified too high? If that's the case, I agree with you. Suggesting adding one sentence to unnack it	to the project implementation risks and not the high-risk SESP rating
L		I	Sentence to unput it.	ingii nok ollor runng

#	Author	Para No./ comment location	Comment/Feedback on the draft MTR report	MTR team response and actions taken
67	RTA	Below table 7, P.36	What does this mean? Can you please substantiate this statement with example(s)? I do not understand this statement.	Accepted and explanation inserted. The 2022 PIR risks reporting contains description of the risk monitoring procedure but not the critical risk management measures
68	RTA	Finance and co-finance P.37	Please make sure that the Total amount here is aligned with the cover page summary sheet.	No action taken. The total amount in Table 8 is the same as the total amount in the cover page summary sheet
69	UNDP	Reporting and communication P.41	Propose to add recommendation on the monitoring aspect, can be combine with recommendation #11 on comms and knowledge management plan	No action taken. The monitoring aspect is already contained in Recommendation 11
70	UNDP	Gender mainstreaming P.41	Was the Gender Results Effectiveness Scale (GRES) used? GRES was discussed during the inception (see "cross-cutting issues" in the Inception Report). Please add to annex http://web.undp.org/evaluation/documents/guidance/gender/GRES_English.pdf	Accepted and GRES rating inserted at the end of the section 3.3.8. The GRES guideline also added to the
71	UNDP	Gender mainstreaming P.42	Consider ensuring the work space is harassment free. Do women in waste collection / separation have access to washrooms, rest space etc. Data sets sex disaggregated data is needed urgently to understand if the work force is mor female of male dominated and at what levels.	Noted. The issue of sexual harassment at work is implicitly included in the 3 rd GAP Objective, however, the latter is considered too ambitious for a project of this size. A statement on that inserted at the end of the section
72	СТА	Financial sustainability P.44	Comment on the possibility to 2. We had a pre-bid meeting and we got 4 potential bidders. It looks we have a competitive bidding process. I know three of them except Greenway and two of them are really big players in hazardous waste business. If there is not a force mejeur situation, we will have a contractor.	Noted but no action taken. The MTR maintains that this procurement requires close supervision.
73	СТА	Financial sustainability P.44	The project is not focusing on resolving the environmental and health effects of inadequate separation and handling of hazardous waste. It is focusing directly to establish an infrastructure for proper separation and handling of hazardous waste. In other words, the project will be successful, if it establishes the proposed mechanism. If separation and handling cannot be achieved by local staff in waste maangement, then it is not a credit for the project.	Noted and no action taken. The commented text is an external risk to sustainability but still related to the project
74	UNDP	Conclusions and recommendations (on the title) p.42	Project team did not submit the GEF Tracking Tool for review. Propose to include this in the recommendation. Could phrase it in a similar way to recommendation 13?	Partially accepted. The project team was supposed to prepare Core Indicators sheet. Statement about that included under M&E.
75	UNDP	Recommendation 2 P.42	N.b. UNDP is already leading this under our limited execution support arrangement as outlined in the existing LOA.	Accepted and recommendation modified
76	UNDP	Recommendation 3 P.42	Disposal is already included in the RFQ that the CO is undertaking. We have stipulated that the HTI technology should be in the following GEF STAP Document.	No action taken. The recommendation addresses the issue that involvement of high- level officials also from outside the MECCT will be required for obtaining the necessary permits
77	UNDP	Conclusion 10 P.49	Additional a gender training session for the PMU and the Steering Committee and any other key stakeholders	Partially accepted and the Conclusion/Recommendation 10 modified. The formulation of gender strategy of the ministry is outside the scope of the project GAP
78	UNDP	Conclusion 11 P.49	, from an M&E perspective, this is something that we need to hugely improve on. What are your thoughts on this? This goes back to the issue on the lack of monitoring of project progress, results and updates, the issue of poor design of data collection system which results in the data not being collected and results/updates are not reported in a periodic manner. Recommendations 10, 12, 13, 14 are all related to the improvement of the project monitoring systems/ PMU's monitoring roles	Accepted and Recommendation 11 modified

#	Author	Para No./ comment location	Comment/Feedback on the draft MTR report	MTR team response and actions taken
79	RTA	MTR Ratings and achievement summary P.51	Repetition of the table	No action taken. The appearance of the table in the Executive Summary and in the body of the report is not a repetition.
80	RTA	Lessons learned p. 51	 This is very little in lessons learned. Please expand it. Actually, many lessons have surfaced in the previous writing. Just a matter of teasing it out and categorizing. For instance, lessons on "why delay happened and how to avoid delay" Lessons on project design (of results indicators) Coordination between METCC with Ministry of Defence. Lessons on stakeholder engagement (FANAKA and WAMCO?) Gender? Knowledge Sharing? CTA role is critical, this should NOT be taken for granted. 	Accepted and text amended with few additional lessons learned
81	UNDP	Annex 1 P.53	Add Gender Results Effectiveness Scale and Methodology to annex http://web.undp.org/evaluation/documents/guidance/gender/GRES_English.pdf	Accepted and the document added to the list of documents consulted (Annex 4)
82	UNDP	List of persons Interviewed	Aysha, as acting ARR for RCC then	Accepted and the record corrected
Addition	ıal commen	ts received 16 October		
83	UNDP	Recommendation Summary p. vi and Conclusions and Recommendations p. 48	Comment on Recommendation 5: WAMCO and FENEKA are already in the PSC (reference: PSC diagram, project document p. 51). This Recommendation might not be valid. Propose to rephrase Recommendation 5.	Partially accepted. Although WAMCO and FENAKA are listed for the PSC membership in the ProDoc, they were not represented at the two PSC meetings (reference: Minutes of the 1 st and 2 nd PSC meetings).Moreover, the interviewed WAMCO representatives did not khave information about progress in the project. Recommendation 5 modified.
84	UNDP	Recommendation Summary p. vi and Conclusions and Recommendations p. 48	Question on CTA as responsible entity for Recommendation 8	Accepted and Recommendation 8 modified to include the CTA as the leading entity
85	UNDP	Management arrangements p. 30	Question on Fig. 2 consistency with Recommendation 5	No action taken. Fig. 2 shows the envisaged but not actually realised organizational structure. Recommendation 5 is formulated to correct this discrepancy.
Last con	nment recei	ved on 27 October		
86	UNDP RTA	Throughout the MTR report	Consistency between the MTR target of safeguarding 24 tonnes of PCB waste and actual estimated 30 tonnes of safeguarded PCB-contaminated equipment	Accepted. 24 tonnes target is consistently mentioned as well as the actual achievement of estimated 30 tonnes of safeguarded transformers and switchgears. For clarity, text under summary achievement of Outcome 2.1 on p. 21

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