**Annex 13 – Management Response**

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| **MTR Summary Recommendation 1:**  **Project Management and Plan:**   1. The global Environment Facility has issued guidelines on core indicators and sub-indicators and recommends that GEF-6 approved projects transition to core indicators and sub-indicators at the next available opportunity in the project cycle (CEO Endorsement/Approval, mid-term or completion). For this secondary copper project, it is recommended to have the outputs prepared during the 2nd phase of the project targeted at these indicators and sub-indicators (shown in section 7.5). In practical terms, this means that the outputs must be much closer related to numerical reductions in the unit of reporting (note: for PCDD/PCDF should be gram of toxic equivalents (g TEQ) and not tons as for other POPs) rather than to textual milestones. | | | | |
| **Management Response:** In the mid-term evaluation stage, BAT/BEP demonstration of the project is in progress, NRP is being formulated, and has not been formally launched, so there is no specific dioxin emission reduction data for the project. However, with the completion and acceptance of BAT/BEP demonstration and the implementation of NRP, the specific data of dioxin emission reduction of the project will be estimated and collected and reflected in the summary report. Of course, the specific implementation process of the project at this stage will closely focus on the GEF 6 core indicators and sub-indicators and strive to make a good summary and promotion on the basis of successfully completing the indicators. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | |
| **Comments** | **Status** |
| BAT/BEP demonstration | By December 2020 | FECO, LPMO, demonstration enterprises | None | completed |
| NRP | By September 2021 | FECO, NRP enterprises | To be followed up | To be completed |
| Development of relevant policies and standards | By June 2021 | FECO | None | completed |
| 1. Since there is no scale to measure the impact on training activities, it is recommended to develop a scheme or at least a categorization as to the targeted groups of training; e.g., government officials, workers at the enterprises but also their line management and the industry associations, industrial park management (which is very specific to China and this project), and the general public. It should be noted that people or groups that have been trained may be trainers for others. Therefore, the training plans, the contents and the actors should be detailed and documented. | | | | |
| **Management Response:** In the mid-term evaluation stage, a large number of training work has been carried out for government officials, enterprise management and technical personnel. Because these training are relatively scattered, some are organized by the national project office, while others are organized by local project offices, associations and demonstration enterprises. Part of the information collected and sorted out by the project is not sorted out and summarized in detail, and the project will be strengthened Collection and summary of training information. On the one hand, we will continue to collect the training information that has been carried out in the early stage, and summarize the training object, content, number, gender ratio and other information. On the other hand, the project will develop corresponding training plans, strengthen the collection and collation of information, and evaluate the training effect. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | |
| **Comments** | **Status** |
| Information collection of the trainings carried out | By September 2020 | FECO, LPMO | None | completed |
| Design and information collection of the trainings to be done | By June 2021 | FECO, LPMO | None | completed |
| 1. A communication and transfer of any result from this project with relevance to article 5 and annex C but also articles 6 on national implementation plan and article 15 on national reporting to the Conference of the Parties to the Stockholm Convention should be pursued with high priority | | | | |
| **Management Response:** Two demonstration enterprises are selected for the project, and two production lines are selected for BAT/BEP demonstration in each demonstration enterprise. In the selection of BAT and process of demonstration, some achievements have been formed and some experience has been accumulated. The project has always attached great importance to the exchange and sharing of these achievements, and shared the achievements of the project to all countries through various international conferences, such as the International Conference on toxic pollutants and the annual conference on dioxins. In the next project implementation process, the project will also carry out the revision of emission factors of secondary copper industry, carry out dioxin emission detection for different raw materials and processes, and update emission factors. Relevant results of the project will be submitted to UNEP to provide technical and data support for the revision of emission factors of recycled copper industry. In addition, according to Article 15 of the Convention, China has to submit national reports to the Convention Secretariat every four years. As the technical support department for the implementation of the Convention, all the achievements under the project will be used as the basic materials for submitting the national report, and the project will continue to play the role of technical support for submitting the national report in the next implementation process. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Acceptance of BAT/BEP demonstration | By September 2021 | FECO, LPMO | To be followed up | To be completed |
| Development of publicity films | By June 2021 | FECO | None | completed |
| Preparation of summary reports | By June 2021 | FECO | None | completed |
| Revision of UNEP dioxin emission factors | By June 2021 | FECO | None | completed |
| Preparation of reports submitted to the relevant authorities | By August 2021 | FECO | None | completed |
| 1. The much broader goals on development goals of China and the causality between unintentional POPs emissions, environmental monitoring systems, using a public private partnership model in industry-chain management should be clearer explained and linked to the project outcomes and outputs. | | | | |
| **Management Response:** Demonstration of smart park management based on PPP mode under the project is being carried out. In the following demonstration activities, the design of the activity and the construction of smart management will be more closely combined with the goal of dioxin emission reduction of enterprises in the demonstration park, and make a summary of the results. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Demonstration of smart park management based on PPP mode | By September 2021 | FECO, LPMO | To be followed up | To be completed |
| Preparation of summary report | By September 2021 | FECO | To be followed up | To be completed |
| 1. The benefits to other non-ferrous metal industries such as aluminium, nickel, lead, zinc, should be highlighted and but also taken into account especially for sustainability aspects but also for financial implications to avoid duplication in the future and be more cost-efficient. | | | | |
| **Management Response:** through the implementation of the secondary copper project, the experience, the knowledges gained from this project are eminently good for the Other non-ferrous metal smelting processes, we have prepared PIF for the secondary metals, and was approved by GEF secretariat in November 2020. Now we are in the design of the project and development of full-size project document. The experience will be learned from the secondary copper project, and be used for the design of the secondary metals project to strengthen the sustainability of the project and cost efficiency of the project  According to the MTR recommendations, the project will timely summarize BAT/BEP demonstration experience, lessons of implementation of the project are also to be summed up, besides, we also plan to prepare publicity films and materials in the next stage of summary and promotion process, and strengthen the publicity and training for other non-ferrous metal enterprises. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| BAT/BEP demonstration | By September 2021 | FECO, LPMO, demonstration enterprises | To be followed up | To be completed |
| Development of publicity films | By June 2021 | FECO | None | completed |
| Preparation of summary reports | By June 2021 | FECO | None | completed |
| Training for other non-ferrous metal industries | By June 2021 | FECO | None | completed |
| 1. A social plan for the workers on workplaces lost and new workplaces created should be developed in the second phase of this project and reported for the terminal evaluation. | | | | |
| **Management Response:** The project will carry out a socio-economic impact assessment by the end of 2020, in which a social plan will be developed in accordance with the recommendations of MTR. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Socio-economic impact assessment of the project | By September 2021 | FECO | To be followed up | To be completed |
| 1. Distinction should be made with respect to measures towards existing sources (copper plants) and new plants; | | | | |
| **Management Response:** The project distinguishes the pollution prevention and control measures and pollutant emission standards of existing copper smelting plants and new plants from two aspects. Firstly, the newly revised *“Emission standards of pollutants for secondary copper, aluminum, lead and zinc industry”* has different requirements for pollutant emission standards of existing plants and new plants; secondly, in the implementation of NRP, the requirements for dioxin pollution prevention and control measures for new plants and existing plants are different. For new plants or new production lines of existing plants, facilities meeting the requirements of dioxin emission standards is required in the process of construction of plants or production lines; for existing enterprises, comprehensive transformation from raw materials, smelting process and terminal treatment is required to meet the requirements of NRP. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Development of *“Emission standards of pollutants for secondary copper, aluminum, lead and zinc industry”* | By December 2019 | FECO | None | Completed |
| NRP | By September 2021 | FECO, NRP enterprises | To be followed up | To be completed |
| 1. It is not recommended to use the term "UPOPs" since "UPOPs" is not used in any of the official documents generated through the Stockholm Convention (U is the chemical symbol for uranium). | | | | |
| **Management Response:** In future reports, the word UPOPs will be changed to UP-POPs according to the MTR recommendation. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Preparation of summary report | By June 2021 | FECO | None | completed |
| 1. It is recommended to compile quantitative information systematically and assess it at least on annual basis to justify interventions and if they are positive or negative or inefficient; | | | | |
| **Management Response:** The project will systematically sort out the quantitative information, such as the number and gender of trainees, the number and personnel of meetings. The project will also evaluate the implementation effect every year according to MTR recommendations. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Information collection of the trainings and meetings carried out | By July 2021 | FECO, LPMO | None | completed |
| Evaluation of the implementation effect for training and meeting | By August 2021 | FECO | To be followed up | To be completed |
| 1. The direct impact on the PCDD/PCDF release inventory (aimed reduction of 396 g TEQ) should be established in a clear methodological approach to allow the national reporting under article 15 of the Stockholm Convention reporting (this is a quantitative table). A great success at the end of the project and a direct contribution from this project to the Stockholm Convention would be achieve - in line with the GEF-indicator on "g TEQ reduced". The model baseline calculation relevant to PCDD/PCDF releases developed by the MTR Team could be used for the assessment of the dioxin reduction towards the terminal evaluation (and the quantitative target). | | | | |
| **Management Response:** After the end of NRP, the project will conduct a comprehensive assessment on the dioxin emission reduction effect of the project by integrating the UNEP dioxin toolkit and the model given by MTR recommendations. The assessment results will be submitted to the Ministry of Ecology and Environment as part of the national report. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| NRP | By September 2021 | FECO, NRP enterprises | To be followed up | To be completed |
| Assessment of NRP | By September 2021 | FECO | To be followed up | To be completed |
| 1. Whereas the MTR Team found the PCDD/PCDF measurement of high quality, there should be a plan which PCDD/PCDF measurements would be undertaken and at which intervals. It shall be clarified if such requirements are laid down in the national or technical standards. | | | | |
| **Management Response:** According to “Emission standard of pollutants for secondary copper, aluminum, lead and zinc industry” issued by Ministry of Ecology and Environment in 2015, dioxin emissions from all newly-built secondary copper, aluminum, lead and zinc enterprises in China should been monitored annually since July 1, 2015, and dioxin emissions from existing enterprises should been monitored annually since July 1, 2017. According to the implementation requirements of the pollution permit system for secondary non-ferrous metals industry in 2018, dioxin emissions from all secondary copper, aluminum, lead and zinc enterprises should be monitored every year, and monitoring results should be written into the quarterly summary report or annual summary report and submit them to the Ministry of Ecological Environment. The specific requirements will be explained and clarified in the next stage of the project reports. | | | | |
| **Key Action(s)** | **Time Frame** | **Responsible Unit(s)** | **Tracking\*** | **Key Action(s)** |
| **Comments** | **Status** |
| Preparation of summary report | By October 2021 | FECO | To be followed up | To be completed |