

UNDP Management Response Template
Mid-term Review: Sound Chemicals Management Mainstreaming and UPOPs reduction in Kenya' (PIMS # 5361)
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Overall comments:

The MTR was conducted between August and November 2019. The Final Report submitted on November 2019. UNDP and the Partners rate the outcome as Satisfactory and participated in coming up with the management responses. The recommendations clearly identify areas where the project team will need to refocus the ongoing implementation, to ensure delivery of the project targets, have in place a sound chemicals management framework for Kenya and track emissions.

Evaluation Recommendation or Issue 1: Review the Targets for reduction in the emission of UPOPs due to Component 3 (Healthcare waste)

The baseline emissions are 19 gTEq/ Yr. The target for emission reduction is also 19 gTEq (Target 48). This is 100% reduction in the emissions. Complete elimination of the emissions of UPOPs from the medical waste is not feasible.

Management Response: The 19gTEq was the baseline in 2015 during the PPG stage. It might have increased or decrease. The project team will establish the baseline and revise the target as recommended.

Key Action(s)	Time Frame	Responsible Unit(s)	Tracking*	
			Status	Comments
Revision of the targets for the reduction of UPOPs due to Health care waste	By 31 January 2020	Project Team UNDP CO		
Communicate the revised target to UNDPRO	By 5th Feb 2020	UNDP CO		

Evaluation Recommendation or Issue 2: Identify emergency measures for reduction of UPOPs due to burning of SW and facilitate their implementation

The Outcome 4.2 (Target 73) requires reduction in the emissions of UPOPs of 20 gTEq/yr. by implementing the emergency measures. However, the project design has not provided for identification and implementation of the emergency measures to achieve this Target. Although, the project design has provided for capacity building and awareness creation etc. the emergency measures, there are no provisions in the project budget to support implementation of the emergency measures.

Management Response:

The capacity building on measures to reduce open burning is informed by the identification of gaps in the ongoing operations of dumpsites at the counties. Emergencies occurrence of fires when generated deliberately or through methane from organic waste does occur. The emergency measures have not been clearly outlined by the project capacity building plan. Though some elements have been covered in the overall capacity building action. The project team will identify and document the emergency measures to be promoted.

Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Definition/identification of emergency measures to address emergency situations at the dumpsites	By 31 January 2020	Project Team		
Emergency measures capacity building plan developed and mainstreamed in project implementation.	By 31 March 2020	Project Team UNDP CO		

Evaluation Recommendation or Issue 3: Promote alternatives to dumping of Organic Solid Waste

The project is promoting recovery of recyclable materials (metals, plastics, glass, paper) at the source of generation of the 'solid waste'. In the baseline situation recovery of such inert materials was happening at the dumpsites (except for the paper) for the SW. Thus, in the baseline the inert components of the SW were not leading to emissions of UPOPs.

Recovery of recyclable materials at the point of generation of waste (instead of the dumpsites) is good, however, it is not leading to any reduction in the emissions of UPOPs as there is no reduction in the quantum (except some waste paper) and composition of the material **getting burned** at the dumpsites. It is recommended that the target (Target 74) for reduction in the emissions of UPOPs due to 3Rs be reviewed and made flexible to include the activities like composting by CBOs at the local level.

The project is already promoting alternate methods for disposal of 'decay-able organic solid waste' at the community level by the CBOs using composting/vermicomposting technologies, but the scale of such activities is very low. It is recommended that the project further promote the composting/vermicomposting at the level of CBOs, to dispose of the organic component of the SW, which doesn't lead to emission of UPOPs and help to achieve the Target of reduction of 3 gTEq/ Yr. due to waste segregation.

Management Response:

Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Revision of Target 74 to include composting	31 st January 2020	Project Team UNDP CO		
Revision of the workplan to include the recommended scale-up of composting actions by the community	31 st January 2020	Project Team UNDP CO		

Evaluation Recommendation or Issue 4: Review of the provisions regarding PRTR

Outcome 1.2: Monitoring activities intensified and strengthened and PRTR database in place, has provided for the laboratory equipment and other such related activities.

However, quantification and monitoring of the emissions of POPs and other hazardous chemicals is mostly done using the emission factors, mass balance methods, engineering calculations and activity rates etc. Thus, although strengthening of the capacity in the country to carry out laboratory operations is good, it is not contributing towards the overall objective of the project.

It is recommended that the provision of Activities/Targets for Outcome 1.2 be reviewed and if required suitably modified.

Management Response: The project team notes that the actions will not contribute towards the objective. However, the information collected is important documentation of the trends at the hotspots and will enable appropriate deductions on the underlying reasons. In Kenya under the Environment and Management coordination Act physical laboratory assessment are the only methods for indicators currently recognized. UNEP toolkits are not recognized by policies and regulations so far. The BAT/BEP guidelines on waste that contain POPs also are explicit on sampling and monitoring of POPs and UPOPs

Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Development of PRTR to provide empirical information on trends of UPOPs emissions at hotspots in Kenya	By 31 May 2020	Project Team UNDP CO		
Revise the activities to include quantification of emissions using the UNEP toolkits.	By 31 January 2020	Project Team UNDP CO		

Evaluation Recommendation or Issue 5: Promote recycling of plastics in HCW

The project is supporting use of non-burn technologies (Autoclave, Microwave) for disposal of HCW. Thus, the project is leading to disposal of HCW in an ESM. However, as the final disposal of the shredded waste out of the autoclave/microwave is still happening by dumping it at the dumpsites (where it eventually gets

burned), there is no reduction in the emission of UPOPs. As per the requirements the use of non-burn technologies for HCW, after treatment the waste needs to be disposed of at a secured landfill or may be used for material recovery.

It is recommended that such methods and the technologies be promoted, wherein the final disposal is done by recycling of the plastic parts of the HCW. This would require not only segregation of the HCW (in terms of plastic and other wastes) but also the separation of sharps at the source of the waste generation. In case of HCW plastics, further segregation in terms of types (syringes, bottles, transfusion kits, gloves etc.) would be needed. Segregated component of plastics can then be treated separately using non-burn technologies (autoclave, microwave, gas chambers etc.) and sent for material recovery.

It is further recommended that the project, facilitate awareness amongst and demonstration to the stakeholders regarding the practice to recycling of the plastic waste out of HCFs. (please see recommendation 8 as well).

Management Response: The PMU and stakeholders agree with this. The partners are meeting in January to give direction on this.

Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Technical Committee meeting	January 2020	Project Team UNDP CO		
Develop an awareness and demonstration of HCF plastic waste recycling manual/kit and a dissemination plan of action	By 28 February 2020	MOH, MEF and NEMA		

Evaluation Recommendation or Issue 6: Extension to Implementation timelines

There was an initial delay in the start of the implementation of the project. Some of the activities involving long procurement processes are presently underway. These activities are important from the viewpoint of the results and effectiveness of the project. The procurement and subsequent implementation of the activities can only be completed if an extension of a year is granted to the project.

Further, in the present case there is a need to provide hands-on training to the ground staff (hospital staff) on the procedures (like segregation of waste, separation of sharps, etc.) to be followed with the introduction of the non-burn technologies for the management of HCW. This should include the pilot run of the whole procedure to be followed for a sufficient period of time. Experience from other projects on health care waste management also highlight that this period after the receipt of the equipment in the HCFs is crucial and requires sufficient time to ensure full acceptance and good operation of the equipment.

It is recommended that a one year no-cost extension to the implementation timelines request be considered, if put forth by the implementation in the last year.

Management Response: The constraints on procurement occasioned in the initial start have been largely addressed. This will facilitate the attainments of most of the project targets. The PMU team feels that this will be achievable. The project team will endeavor to complete the project as originally planned.

Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Multi-year Annual workplans 2020 and 2021 to fully cover the planned activities to project end.	By 31 December 2019	Project Team UNDP CO UNDP RSC		
Adaptive management to fast track planned activities for 2020/21	By 31 May 2020	Project Team UNDP CO		
Seek project extension if key actions for sustainability are yet to be	By 31 December	Implementing		

realized and no other solution is identified to complete all activities by the planned completions dates. It is generally not recommended to extend project duration and all other alternate solutions to accelerate delivery and satisfactory completion by the agreed deadline will be preferred.	2020	Partner UNDP CO		
Evaluation Recommendation or Issue 7: Prioritize the hardware procurement activities				
There is a provision of USD 1.3 million (out of total GEF funding of about USD 4.5 million) for procurement of HCW management equipment. Considering the long procurement process, it is recommended to prioritize procurement of these equipment to ensure timely and proper utilization of this provision. This will also help towards better overall utilization of the budget for the project.				
Management Response: The project team agree with the recommendation. The specifications for hard ware have been agreed with and procurement will proceed as expected. In addition, MEF has required that all procurement plans be shared by Feb 2020				
Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Identify and provide specification of all the hardware for the HCW management	By 31 January 2020	Project Team UNDP CO		
Procurement plan to cover all the hardware for the HCW management. Procurement to follow as planned.	By 30 June 2020	Project Team UNDP CO		
Evaluation Recommendation or Issue 8: Facilitate implementation of measures/ technologies to dispose of SW in ESM and recycling of plastics in HCW by private sector participation.				
There is a high level of interest amongst government counter parts to involve private sector for treatment of SW. The counties where the interventions under the project are being carried out has already initiated efforts in this direction. However, in the absence of any past experience and specific knowledge about the suitable PPP models for treatment of SW, the efforts are not focused. It is recommended that the project facilitate uptake of PPP for disposal of SW and for recycling of plastics in the HCW. In this regard following sequential activities may be undertaken;				
<ul style="list-style-type: none"> a) Preparation of a report on the best practices and case studies of PPP for SW in other developing countries having similar situation b) Based on a) and specific conditions of Kenya, recommendations regarding SW disposal technologies and recycling of plastics in HCW and the corresponding PPP model c) Sensitization of the stakeholders (relevant government officials, politicians, representatives of industry etc.) about the findings of a) and b) above d) Study tour of the stakeholders to the countries/locations where such PPP initiatives are working successfully 				
Management Response: The partners concur that SW management at county level requires private sector investment to be sustainable. Kenya as a country is yet to identify disposal technologies that will work for the volumes generated at urban settlements. The recommendations are fully taken.				
Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Develop a private sector dialogue and engagement framework	By 31 March 2020	Project Team		
Preparation of a report on the best practices and case studies of PPP for SW in other developing countries having similar situation	By 31 December 2020	Project Team		
Based on a) and specific conditions of Kenya, recommendations regarding SW disposal technologies and recycling of plastics in HCW and the corresponding PPP model	By 31 December 2020	Project Team		
Sensitization of the stakeholders (relevant government officials, politicians, representatives of industry etc.) about the findings of a)	By 31 March 2021	Project Team		

and b) above				
Study tour of the stakeholders to the countries/locations where such PPP initiatives are working successfully	By 31 March 2021	Project Team UNDP CO		
Evaluation Recommendation or Issue 9: More involvement of private sector (e.g. waste recycling firms) in the project activities				
The project design has provided for taking on board the private sector (recyclers) to increase the collection of recyclable waste. Somehow, the level of involvement of the private sector in the project is lagging. It is recommended that the level of involvement of the private sector be increased.				
Management Response: The roles of private sector players in waste recycling to be identified and linkages with the community collectors facilitated.				
Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Potential areas for Private Sector engagement in the waste recycling value chain clearly identified for the respective counties	By 28 February 2020	Project Team		
MOUs/Supply Contracts signed with the companies that contain targets and the support to attain increase in recycling	By 30 April 2020	Project Team		
Evaluation Recommendation or Issue 10: Formalize the dropping of the activity to replace mercury devices with non-mercury devices				
For the activity of developing the procedure and guidance for the replacement of mercury devices with non-mercury (Target 29). It was found during the survey that the inventory of Thermometers and Sphygmomanometer with mercury is not much at the HCFs. Accordingly, it was decided by the project team that this activity/Target be dropped from the results frame-work of the project. It is recommended to formalize this, through the SC meeting.				
Management Response: The partners agree to the recommendation.				
Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Revision of Target 29 through the PSC	By 31 January 2019	Project Team UNDP CO		
Monitoring of the replacement of equipment with mercury to continue but not as part of the project reporting targets	By 31 May 2021	Project Team		
Evaluation Recommendation or Issue 11: Hire Technical Advisor for the project				
It would help, if the project implementation gets the benefit from the expertise of an international technical expert, hired under a contract for a longer period (part-time) to advise the project team on a regular basis (please see recommendation 11). The project may appoint an international technical expert to help and provide guidance on technical matters.				
Management Response: This technical advisor would be valuable in monitoring and evaluation of delivery against the SC requirements.				
Key Action(s)	Time Frame	Responsible Unit(s)	Tracking	
			Status	Comments
Review budgets and activities to identify resources for the engagement of technical advisory services	By 31 January 2020	Project Team UNDP CO		
Engage technical advisor as allowed by resources, as and when required	Ongoing (ASAP) till 31 May 2021	Project Team UNDP CO		

* The implementation status is tracked in the ERC.