

INTEGRATED SAFEGUARDS DATA SHEET CONCEPT STAGE

Report No.: ISDSC8397

Date ISDS Prepared/Updated: 10-Feb-2015

Date ISDS Approved/Disclosed: 17-Mar-2015

I. BASIC INFORMATION

A. Basic Project Data

Country:	Mali	Project ID:	P146247
Project Name:	Mali Obsolete Pesticides Disposal and Prevention Project (P146247)		
Task Team Leader(s):	Dahlia Lotayef		
Estimated Appraisal Date:	24-Feb-2015	Estimated Board Date:	30-Apr-2015
Managing Unit:	GENDR	Lending Instrument:	Investment Project Financing
GEF Focal Area:	Persistent Organic Pollutants		
Sector(s):	General agriculture, fishing and forestry sector (100%)		
Theme(s):	Pollution management and environmental health (100%)		
Financing (In USD Million)			
Total Project Cost:	5.14	Total Bank Financing:	0.00
Financing Gap:	0.00		
Financing Source		Amount	
Borrower		1.00	
Global Environment Facility (GEF)		3.19	
DENMARK Danish Intl. Dev. Assistance (DANIDA)		0.95	
Total		5.14	
Environmental Category:	A - Full Assessment		
Is this a Repeater project?	No		

B. Project Objectives

The proposed Project Development Objective (PDO) is to eliminate risks from existing publicly-held obsolete pesticide stocks and associated waste; and implement measures to reduce future accumulations of obsolete pesticides and associated waste.

C. Project Description

The following three components are proposed:

Component 1: Disposal of publicly-held OPs and associated waste and reduction of risk from three priority high-risk contaminated sites.

Sub-component 1.1: Disposal of publicly-held OPs and associated waste

- i. Removal and centralization of low-risk stocks: learning from the successful experience of ASP-Mali, trained national teams will be tasked to remove and centralize stocks defined as low-risk (stocks which do not contain WHO class Ia (extremely hazardous) or Ib (highly hazardous) pesticides and weigh less than 500kg), prior to their disposal as part of the overall disposal contract as described below. Appropriate safeguard measures will be detailed in the ESIA.
- ii. Disposal of low, medium and high risk stocks: a qualified international firm will be contracted for this specialized operation. Disposal will take place in an established treatment or disposal facility in a highly regulated environment (most likely, but not necessarily, in Europe). Overseas shipment of stocks and their disposal will meet the requirements of the Basel and Stockholm conventions.
- iii. Sustainable management of OPs: a full national inventory update will be conducted at project mid-term, with the aim of strengthening data management streams and updating the national OPs database (the PSMS).

DNACPN will utilize the data in the PSMS, recently purchased equipment, risk profiling and approved safeguard documents to facilitate the disposal of the OPs and waste stocks. The amount of stocks to be disposed of and the cost of this sub component will be determined during project preparation on the basis of the sites' audit and the current disposal unit cost.

Sub-component 1.2: Risk reduction from contaminated sites

- i. Risk reduction at three priority high-risk contaminated sites: the sites of Goundam, Bambara Maoude and Kara were pre-identified during ASP-Mali as posing the highest risk of environmental contamination and/or human health impacts. The above-mentioned pre-feasibility study, characterizing the type and extent of contamination at each of the sites, will inform the technical options for risk reduction.
- ii. National plan for decontamination of priority sites: The project will develop a national plan for decontamination of other priority sites, already or to be identified in the country. The plan will be based on characterization of sites and proposals for risk reduction and financing options. In particular, it is expected that sites in the North that have been difficult to access due to security reasons will be evaluated, including Tin Essako (a burial site 150km from Kidal), Gao (a destroyed pesticide store, 1,200km from Bamako), and Anéfis (a well and surrounding area heavily contaminated by dieldrin, 90km from Kidal).

Local and international NGOs could play a role in carrying out independent monitoring of disposal and contaminated soil removal activities via the Pesticides Action Network in Mali (PAN-Mali) with the aim to ensure the objectivity of cleanup operations and promote awareness of civil society. External supervision of disposal compliance with international standards will also be financed.

Expected outcome: Elimination of POPs, POPs waste and other harmful substances originating from

publicly-held OPs and associated waste, and reduction of health and environmental risks from highly contaminated soil

Expected key outputs:

- i. Disposal of 580 tonnes of publicly-held OPs and associated waste (target to be confirmed)
- ii. An updated national inventory of publicly-held OPs and associated waste
- iii. Reduction of risk emanating from highly polluted soil in Goundam, Bambara Maoudé and Kara
- iv. A national plan for decontamination of prioritized sites polluted by pesticides

Component 2: Reduction of re-accumulation of OPs and associated waste

ASP-Mali's key "prevention" achievements are the development of a National Prevention Plan (PNP, dated July 2007), development and updating of legal and regulatory texts for re-accumulation control, regulation enforcement support to government agencies, and pesticide and waste management training to stakeholders. In addition, PAN-Mali educated and raised the awareness of farming communities to the health risks of pesticide mishandling. Several programs were gender focused, addressing the specific requirements of women. With regard to empty pesticide containers, pilot activities were carried out in two of Mali's four cotton zones : PAN-Mali raised the awareness of communities to the health risks of re-using contaminated empty pesticide containers, and as a result, most of the containers were collected into collection points/stores in the villages, where they are still being held. Finally, ASP-Mali helped activating the CNGP as a multi-stakeholder body responsible for overseeing control of pesticides; however, CNGP did not continue functioning once ASP-Mali was closed due to lack of funding.

Analysis of remaining key weaknesses along the pesticide life cycle in Mali shows that (i) there remain some legislation gaps related to OP management procedures and responsibilities, container management and pesticide import and registration; in addition, the texts and PNP that were developed by the ASP-Mali need to be formally endorsed and put to implementation; (ii) there is a lack of sustainable funding sources for pesticides, OPs and empty containers management and for the CNGP; (iii) weak collaboration between importers/distributors and DNACPN, including on data management (for both pesticides and OPs); (iv) there are capacity gaps for pesticide inspection and control, and OPs management in the public sector; and (v) there is need for continued awareness raising and communication with communities about OPs mishandling. The following activities are proposed accordingly:

Sub-component 2.1: Pesticide management policy, regulation and institutional support

- i. Finalization of draft ordinances and procedures for pesticide management, and submission for endorsement by the CNGP before submission for official approval:
 - Draft Ordinance on the implementation of the Polluter Pays Act No. 01-020 (May 30, 2001) related to management of pollution and nuisance from seized OPs and related waste;
 - Draft Inter-Ministerial Ordinance on empty pesticide containers management;
 - Draft Inter-Ministerial Ordinance on rules for packaging, transportation, storage and disposal of pesticides;
 - Draft ordinance on pest and pesticide control agents' registration;
 - Draft ordinance determining terms and conditions for pesticide use.
 - Forms and procedures for inspection and control of pesticides sale, import and/or

formulation;

- Procedure for pesticides transportation control;
- Procedures for managing seized pesticides and closed off stores;
- Procedure for pesticide marketing applications;
- Procedure for notification of OP detention to DNACPN; and
- Draft text on OPs seizure and detention notification, in accordance with Article 38 of Act No. 01-020 (May 30, 2001) on pollution and nuisance.

ii. A feasibility study on sustainable financing instruments for pesticides management in Mali. The study will include sections on the pesticide life cycle, empty container management, review/analysis of the role of the private sector, and actions to ensure the sustainable operation of the CNGP. The study will eventually be endorsed by CNGP and then submitted to the Government with concrete recommendations for implementation.

iii. Institutional support:

- Support to DNACPN's data management ability, focusing on the PSMS as the main data management instrument, and looking at the various data streams, including periodical inventory of pesticide stores;
- Support to DNACPN's strategic orientation and management capabilities;
- Support to DNACPN to implement the polluter pays principle for OPs (information, raising the awareness of users, and reinforcement of DNACPN's enforcement capacity); and
- Training stakeholders in pesticide inspection and control, management of seized pesticides and pesticides resale and trade (distribution/sale).

iv. Evaluation and updating of the PNP accordingly, and having it endorsed by the concerned authorities. The mainstreaming of key elements of the PNP into government's annual work plans and budgets is expected as part of the recommendations of the sustainable financing study.

Sub-component 2.2: Empty container management

Continuing ASP-Mali's container collection efforts by (i) scaling up collection efforts to all cotton-producing regions and (ii) establishing a recovery structure whereby collected containers are centralized for subsequent treatment (recycling or safe disposal) in accordance with the results of the sustainable financing study.

Sub-component 2.3: Communication and awareness raising

Updating and implementing ASP-Mali's communication plan (for communication between the DNACPN and government stakeholders) and developing and implementing a communication and awareness raising plan with the audience being affected communities and stakeholders.

Expected outcome: Sustainable reduction of new accumulations of OPs and associated waste

Expected key outputs:

- i. Finalized ordinances and procedures for management of pesticides, OPs and waste endorsed by the CNGP and submitted for official approval
- ii. A feasibility study on sustainable financing instruments for pesticides management endorsed by the CNGP and submitted to government for approval
- iii. Training sessions for DNACPN staff and other stakeholders
- iv. Collection and recovery of empty pesticide containers in all cotton zones

- v. Implementation of communication and awareness raising tool for internal and external audiences
- vi. An updated and endorsed PNP (on the basis of other outputs)

Component 3: Project management

The project will be managed according to the following principles: (a) ensuring strong project delivery; (b) building on existing competences and expertise from ASP-Mali; and (c) ensuring sustainability of institutional arrangements (including sustainable financing) and capacity. A PMU will therefore be embedded within DNACPN and comprise designated staff from the ministry; technical consultants could be considered for a limited period of time at the beginning of the project. It is expected that the PMU will comprise a coordinator, an administrative and financial manager, an accountant and a procurement specialist (either from PAPAM or a consultant due to shortage of experienced procurement specialists in the government).

The PMU's main tasks will be to monitor and evaluate project progress; prepare work plans and procurement plans; facilitate stakeholders' workshops and meetings; and report on project progress and financial status via periodical report according to an agreed timeline. Project M&E will be carried out using ASP-Mali's existing M&E system, including software, data collection methods and reporting formats according to an agreed results framework.

Expected outcome: Effective project management and M&E

Expected key outputs: periodical progress reports, including mid-term and completion reports, Interim unaudited Financial Reports, internal and external financial audits, annual work plans and procurement plans

Implementation and institutional arrangements

DNACPN will be the project Implementing Agency under the supervision of the Director General, or any other high level official of DNACPN as designated by the Minister of Environment and Sanitation. The project will be overseen by a National Steering Committee (NSC, based on the Steering Committee of ASP-Mali), which will be chaired by the MEA Minister and include representatives from relevant ministries and directorates, pesticide importers and NGOs. The NSC will endorse work plans and budgets, provide overall guidance to the PMU and ensure continued government commitment to project objectives.

Where appropriate, the project may seek specialized guidance from consultants and ad hoc thematic working groups under the NSC. Previously, a Prevention Working Group and a Soil Decontamination Working Group were formed to help plan and implement prevention and soil decontamination activities. It is therefore likely that these groups will be reconvened for the purpose of the proposed project. In addition, discussions are ongoing between the World Bank and CLI about the possibility of providing the PMU with technical support for disposal (OPs inventory and collection training, review and supervision of the disposal contract, training and supervision of work in the contaminated sites, etc.).

D. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

E. Borrowers Institutional Capacity for Safeguard Policies

F. Environmental and Social Safeguards Specialists on the Team

Maman-Sani Issa (GENDR)

II. SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	In essence, the project's overall environmental and social impact is expected to be highly positive because of the nature of its activities. The project will reduce the risks of exposure and consecutive potential acute intoxication of human and the environment by removal and safely disposing hazardous wastes (obsolete pesticides, empty containers, and highly contaminated soils). Therefore, the negative risks and/or impacts will arise from the processing, mainly during the repacking, transportation, remediation of sites, and temporary storage prior evacuation, as for any activity related to the handling of hazardous wastes. These adverse consequences would affect human health (the communities living close to the sites and the employees of the contractor) and the environment through contaminated dusts or in cases of accidental leakage or spills. The project is categorized A, and the WBG environmental, health and safety (EHS) guidelines also apply. The ESIA will integrate social mitigation measures. The environmental assessment report of ASP-Mali will be updated, consulted upon and disclosed in-country and at the Bank InfoShop prior to appraisal.
Natural Habitats OP/BP 4.04	No	The project will not finance any activity that involves or affects natural habitats.
Forests OP/BP 4.36	No	The project will not finance any forest management related activity or any activity likely to indirectly induce forest exploitation/degradation.
Pest Management OP 4.09	Yes	The project involves the management of obsolete pesticides, which will be addressed in the ESIA.
Physical Cultural Resources OP/BP 4.11	No	The project's activities will not induce digging up, exploitation of borrow pits or quarries, or be implemented at sites with physical cultural resources.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project implementation areas.
Involuntary Resettlement OP/	No	The project activities do not involve land acquisition

BP 4.12		leading to involuntary resettlement or restrictions of access to resources or livelihoods.
Safety of Dams OP/BP 4.37	No	The project will not finance any activity related to dams.
Projects on International Waterways OP/BP 7.50	No	The project will not finance any activity which may induce water resources uptake from the Niger river, of the modification of its ecosystem.
Projects in Disputed Areas OP/BP 7.60	No	The project area is not being implemented in areas under dispute between countries.

III. SAFEGUARD PREPARATION PLAN

A. Tentative target date for preparing the PAD Stage ISDS: 02-Mar-2015

B. Time frame for launching and completing the safeguard-related studies that may be needed.

The specific studies and their timing¹ should be specified in the PAD-stage ISDS:

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The updating of the existing ESIA was completed in December 2014 and it was made available on the Web and sent to the InfoShop on December 24, 2014.

IV. APPROVALS

Task Team Leader(s):	Name: Dahlia Lotayef	
<i>Approved By:</i>		
Safeguards Advisor:	Name:	Date:
Practice Manager/ Manager:	Name:	Date:

¹ Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.