

## Management Response: Implementation Plan for Evaluation Recommendations

### General Information

Eval ID	690
Evaluation Manager	Janet Wildish
Project Evaluation Title	Terminal Evaluation of the UNEP/GEF project "Defining and Demonstrating Best Practices for Exchange of Information on Chemicals in Textile Products"
PIMS #	
GEF ID	5662
UNEP Sub-programme	SP5 – Chemicals, Waste and Air quality
GEF Focal Area	Chemicals & Waste
Project Manager/ Task Manager	Eloise Touni; Tessa Goverse
Office/Division	Economy Division
Branch & Unit	Economy - Chemicals and Health Branch
Final PDF Report distributed by Evaluation Office (Date)	08/12/2021
Total # of Recommendations as per Report	7
Implementation Plan Sent to PM/TM (Date)	30/12/2021
Implementation Plan Returned by PM/TM (Date)	21/01/2022
Implementation Plan finalized (if different from the date above)	

### Implementation Plan

No	Challenge/problem to be addressed by the recommendation	Recommendation	Priority level	Type of Recommendation	Responsibility	Proposed Implementation time-frame	Acceptance	Reason if not Accepted or Partially Accepted	Management Action(s) to be taken
1	UNEP is developing a follow up GEF initiative for the Asia region: Reducing uses and releases of chemicals of concern, including POPs, in the textiles sector – GEF ID: 10523. According to the developer of the proposal, the lessons and good practices of the project under evaluation will be taken into consideration to develop the proposal. For the project under evaluation, due to disagreement between UNEP and FECO on the	UNEP is developing a new regional proposal on chemicals in textile products, the local context and practices in the textile sector of the participating countries (Bangladesh, Indonesia, Pakistan and Vietnam) should be duly considered while developing the proposal for the Asia Textile Project	Critical	Project	Chemicals and Health Branch, GEF Chemicals and Waste Unit.	To be included in the project proposal to be submitted to GEF	Accepted		Asia regional proposal CEO Endorsement Request to include lessons and good practices from the China textile project.

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	scope of information exchange on chemicals, and also on whether there was need to include information in the wastes, the development of the information exchange tools was delayed.								
2	Recognising the above average risk to women, children and impoverished communities, the project document mentioned awareness raising activities targeting women and vulnerable groups would be done. It also mentioned that participation of women in the project would be promoted. There was no evidence however whether these activities and proposals were undertaken during project implementation	To ensure that human rights and gender equality dimensions are considered during project implementation, it is recommended that these dimensions are included not only in the project design, but also in all work planning and that appropriate indicators are developed in the project results framework to track their implementation.	Critical	Project	Chemicals and Health Branch	During the development of future proposals in which the human rights and gender equality are important dimensions that need to covered.	Accepted		Future project proposal development to include gender analysis which includes indicators and a monitoring plan
3	The project has been successful in the delivery of all outputs. However, the rate of uptake of project results has been slow. In particular, the small enterprises, and to a certain extent medium enterprises as well, were reluctant to adopt the CiE on line platform for reporting information on chemicals.	In order to increase the rate of uptake, the project results should be promoted among the enterprises of the textile supply chain, targeting small and medium enterprises. To encourage them in that direction, they should be made aware of the Made in China 2025 national strategic plan	Important	Partners	FECO / CNTAC	October 2021 – December 2023	Partially Accepted	We seek further guidance from the Evaluation Unit on how UNEP can address these recommendations that are for the Chinese government to complete with SMEs. The Management Action proposed for UNEP may not be able to complete the recommendation for FECO to raise awareness of SMEs on chemical issues (which we understand are not currently addressed by	1. CHB to prepare letter and invite FECO and CNTAC to brainstorm on relevant uptake of the project's deliverables, into future textile related initiatives. 2. BCRC Indonesia to invite FECO and CNTAC to present at Asia Regional textile inception & technical meetings on SME and chemicals (due to start in Q3 2022).

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								Made in China 2025).	
4	The manufacturing restricted substances list (MRSL) of the CiP project has been adopted by the Chinese textile sector as group standard (T/CNTAC 8-2018). Of the 92 hazardous chemicals listed in the MRSL, 42 are prohibited/restricted under the Chinese Regulations, and the remaining 50 are not. Of these 50 chemicals, 3 are listed as POPs and one has been proposed for listing under the Stockholm Convention. Ideally, all the 51 non-regulated chemicals listed on MRSL should be prohibited/restricted under the Chinese Regulations in that they can no longer be legally used in the textile sector. Otherwise, one can argue that although they are restricted under the group standard T/CNTAC 8-2018, since they are not legally prohibited/restricted so they can be used.	For the 4 chemicals of concern under the Stockholm Convention, as China has ratified the convention, the evaluation recommends that the relevant authorities take the necessary actions to include them in the prohibited/restricted list of the national regulations once these chemicals are approved to take effect in China.	Critical	Partners	Chinese Government / MEE	October 2021 – December 2022	Partially Accepted	We seek further guidance on how UNEP can address recommendations for third parties. The Management Action proposed will likely not alone result in the recommended change in Chinese regulations which is beyond UNEP's control.	CHB to prepare letter to MEP, to share project results and evaluation recommendations, and ask for a meeting to share current status and explore future opportunities. As this recommendation goes beyond the scope of the concluded GEF project, we will explore interest from the Government for a follow up project or support for this regulatory change.
5	It was found that most small and some medium enterprises were reluctant to adopt the CiE system to report or exchange information. In China, it is difficult to truly implement the CiE system for exchange of information as it is solely based on enterprises' willingness to adopt such systems in the absence of mandatory policy or legal requirement. 41 of the 92 chemicals on the MRSL are already prohibited/restricted by national regulations	As a way to ensure that these chemicals are no longer being imported or manufactured locally, and hence no longer used in textile sector, it is recommended that the relevant enforcing authorities take the necessary steps to strictly check for compliance with national policies and regulations at chemical manufacturing enterprises or during importation of chemicals.	Critical	Partners	FECO/CAIQ	To start soonest possible and onward.	Partially Accepted	We seek further guidance on how UNEP can address recommendations for third parties. The Management Action proposed is accepted but will likely not alone result in the recommended change in enforcement activity. Neither FECO or CAIQ are enforcement agencies	see above action. As this recommendation goes beyond the scope of the concluded GEF project, we will explore interest from the Government for a follow up project to support enforcing agencies.

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								mandated for such checks.	
6	<p>It was stated that the global scope of the project under evaluation would include multiple industries in the future, such as toy industry and electronics industry. Currently, the UNEP-led GEF global initiative, Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM) (GEF ID 9771), is being executed by the SAICM secretariat. China is one of the 43 beneficiary countries. The Component 2 of this initiative relates to the life cycle management of chemicals in building products, toys and electronics. For China, this component is being executed by the Basel Convention Regional Centre (BCRC) in Beijing, which is hosted by the School of Environment of Tsinghua University</p>	<p>Although the project under evaluation has ended, UNEP/FECO should consider establishing a cooperation with the UNEP-led GEF global initiative, Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM) initiative in order to promote the project results that would be mutually beneficial.</p>	Important	Project	UNEP/FECO	November 2021 – December 2022	Accepted		<p>1. Project results summary to be prepared and uploaded on saicmknowledge.org knowledge platform</p> <p>2. Discussions with government partners (see Recommendations 3, 4, 5 above) to be facilitated via the SAICM FSP work on toys (meetings &amp; in-country partners)</p>
7	<p>To report financial expenditures, FECO included an additional item, exchange loss, to reflect the loss incurred due to the fluctuating exchange rate between the Chinese Yuan and the US Dollar. Over the project duration the loss amounted to \$30,260, which was 4.8% of the total amount received by FECO. Noting that project management cost is generally 10% of the total GEF grant, the exchange loss represented half of PMC for FECO. This loss did not however affect</p>	<p>One way to mitigate the risk of exchange loss might be that the agency receiving the funds to have an account in the currency of the funds being transferred.</p>	Opportunity for improvement	UNEP-wide	UNEP	In all future initiatives where transfer of funds might result in exchange loss	Partially Accepted	<p>It is not possible to know in advance whether exchange differences would be loss or gain, and these are anticipated to balance out overall.</p>	<p>GEF C&amp;W team to review all bank accounts registered &amp; propose to all non USD account holders to consider opening US\$ project account where feasible and in line with government and other EA policies.</p>

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	execution as \$20,502 was unspent for project personnel at project closure. This would have been problematic had all the budget been disbursed.								