Management Response: Implementation Plan for Evaluation Recommendations

UN environment programme | Evaluation Office

General Information

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Evaluation Manager	Fabio Fisicaro
Project Evaluation Title	Strengthening Hydrocarbon Pollution Remediation Project (HYPREP) for initiating clean-up from oil contamination in Ogoniland
PIMS #	2030
GEF ID	
UNEP Sub-programme	SP2 – Resilience to Disasters and Conflicts
GEF Focal Area	Chemicals & Waste
Project Manager/ Task Manager	Hassan Partow
Office/Division	Ecosystems Division
Branch & Unit	Response and Recovery Unit
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Implementation Plan finalized *(if different from the date above)*	00/00/00

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
Rec-No	Challenge/problem to be addressed by the recommendation	Recommendation	Priority level (Please select from the drop-down list)	Type of Recommendation (Please select from the drop-down list)	Responsibility	Proposed Implementation time-frame	Acceptance (Please select from the drop-down list)	Reason if not Accepted or Partially Accepted	Management Action(s) to be taken
1	HYPREP is a very complex project with many diverse thematic programmes. In order to be able to concentrate on each of them and source for additional funding, HYPREP should be	HYPREP should organise its workplan into six programmes in a very coordinated manner: 1)Environmental remediation: 1.1 Mangrove ecosystem restoration, 1.2. Shoreline clean-up, and 1.3.	Critical	Partners	HYPREP (UNEP Project Manager to pass the recommendation to HYPREP)	3 months	Partially Accepted	While this covers the core aspects of HYPREP's work, further discussions on the work plan are required taking into	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations

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	categorised into the themes that they are presenting.	Soil and groundwater remediation; 2)Livelihoods and Sustainable Development Project, by building alternative livelihoods through vocational training and supporting Ogoni people in the formation of start-up businesses; 3)Potable Water Project; 4)Power Projects, including the use of renewable energies like solar, wind, and biogas; 5)Building and equipping Health Centres, including performing Public Health Assessments; and 6)Building and promoting the Centre of Excellence for Environmental Restoration (CEER).						account other elements including communications and stakeholder engagement as well as the human resources and budget required. There are also emerging areas of work such as the public health assessment that started recently which would need to be considered.	be taken in consideration to strengthen HYPREP's performance.
2	HYPREP should choose qualified contractors and the best-in-class technology for the hydrocarbon pollution remediation of the high-risk sites.	HYPREP should continue the environmental restoration of medium-risk and high-risk complex sites in the order it usually does: Soil and groundwater remediation, Shoreline clean-up and Mangrove restoration. HYPREP should apply the agreed-upon UNEP Performance Framework to identify and hire new remediation contractors for medium and high-risk complex sites. For the hydrocarbon pollution remediation of the high-risk sites, HYPREP should choose qualified contractors and the best-in-class technology, especially where the population is living above the lots, in order not to endanger them. All other HYPREP Projects (Livelihoods and Sustainable Development Project; Potable Water Project; Power Projects, including	Critical	Partners	HYPREP	3 months	Accepted	HYPREP have commenced dialogue with international remediation companies around the globe including Australia, Europe and China. However, the key constraint will be the availability of sufficient funds to undertake these works.	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.

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		the use of renewable energies like solar, wind, and biogas; Building and equipping Health Centres, including performing Public Health Assessments; and Building and promoting the Centre of Excellence for Environmental Restoration (CEER)) should run parallelly to the environmental remediation projects in order to fulfil the UN 2030 Agenda for Sustainable Development, and to enable and sustain the well-being of the Ogoni people on their land.							
3	Maintain sustainable and stable leader at the Federal Ministry of Environment and the HYPREP project office.	The Nigerian Government should try to maintain a stable leadership at the Federal Ministry of Environment and HYPREP (i.e., Project Coordinator) to enable the sustainable performance of the complex HYPREP workplan and retain knowledge and consistency of implementation activities.	Critical	Partners	Nigerian Federal Government and HYPREP	12 months	Partially Accepted	While stable leadership is undoubtedly beneficial, ministerial appointments are a sovereign matter and fall outside the UN's purview. That said, there has been a reasonable degree of stability so far, with the HYPREP project coordinator holding office for over two years, and the current Minister serving for nearly as long.	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.
4	No Public Health Assessment for Ogoniland exist.	Building upon UNEP's 2011 recommendation for a comprehensive health assessment to be undertaken throughout Ogoniland, HYPREP should engage with the World Health Organization (WHO) and the International Agency	Critical	Partners	HYPREP	6 months	Accepted	This recommendation has been implemented through the signing of an agreement between HYPREP and	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in

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		for Research on Cancer (IARC) and submit a common costed proposal for undertaking the Public Health Assessment of Ogoniland.						WHO's International Agency for Research on Cancer in late 2024, followed by the commencement of fieldwork in April 2025.	consideration to strengthen HYPREP's performance.
5	Hydrocarbon pollution has protruded deeper into the ground and into the groundwater, therefore, a renewed assessment of the remediation sites needs to be performed.	HYPREP should perform a renewed assessment of the high-risk complex remediation sites.	Critical	Partners	HYPREP	6 months	Accepted	HYPREP are presently evaluating bid documents for characterisation of complex sites from experienced international companies. Works are aimed for completion by the end of 2025. However, presently it is questionable whether HYPREP have sufficient funds to proceed with remediation works on complex, high-risk sites.	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.
6	Create good publicity for the HYPREP project.	HYPREP should initiate and work on good project publicity using the results of all the good projects and the sustainable development community in Ogoniland, through local and international media outlets and leading newspapers.	Critical	Partners	HYPREP	3 months	Accepted	The monthly HYPREP Herald captures all of HYPREP's activities and is circulated to a host of national and international stakeholders. In addition, in recent months, HYPREP have employed a qualified individual who is managing all of HYPREP's on-line news on	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.

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								various platforms including Facebook, Linked-In and Instagram.	
7	The HYRPEP pilot projects in the following thematic areas: vocational training and microfinancing for livelihoods rehabilitation and building resilience; potable water and sanitation projects; power and renewable energy projects; health projects; and enabling food security projects should be replicated. Once the funding has been provided, HYPRER should co-implement, scale-up, and replicate some of the HYPREP pilot projects, also collaborating with thematic UN Agencies under a coordinated action of the UN Country Team in Nigeria. Replicate and scale-up various HYPREP projects together with International Organizations, including diverse UN Agencies.	The successful pilot projects that have been implemented in all HYPREP pillars should be scaled-up and replicated by sourcing funding from international donors.	Critical	Partners	HYPREP	6 months	Partially Accepted	Before scaling up pilot projects, a comprehensive review should be undertaken to assess them including lessons learned, with particular attention to operation and maintenance aspects—especially for infrastructure-related components. Discussions with the UN Country Team, regarding technical support to HYPREP including potential scale-up of interventions have commenced and are ongoing.	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.
8	HYRPEP should prepare a Gender Strategy for inclusion and improvement of livelihoods of women through training and job creation. It should also prepare Human Rights Strategy including livelihoods improvement strategy for all vulnerable population and persons living with disabilities.	HYRPEP should work on strengthening the human rights and gender dimensions by preparing a Gender Strategy and Human Rights Strategy.	Critical	Partners	HYPREP	6 months	Accepted		Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.

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9	According to UNEP's Environmental Assessment, the 1 billion USD was initial funding for approximately five years of project implementation. Provide sustainable financing and replenishment for the HYPREP's Trust Fund and sustainable continuous implementation of HYPREP's activities.	After performing the renewed assessment of the high-risk complex sites, and having assessed the costs for their remediation, the Nigerian Federal Government and HYPREP should seek additional funding for the replenishment of the HYPREP Trust Fund, whose first funding was 1 billion USD.	Critical	Partners	Nigerian Federal Government and HYPREP	12 months	Accepted	The Minister of Environment and Chair of the Board of Trustees are actively exploring additional funding for HYPREP. SPDC have recently sold-out to Renaissance, and it is questionable whether Renaissance will contribute to the Ogoni Trust Fund. It is likely that future funding for HYPREP will have to come from the FGN - who are the majority shareholder in all oil JVs.	Draft letter to the Minister of Environment sharing the HYPREP evaluation report and requesting that its recommendations be taken in consideration to strengthen HYPREP's performance.
10	No risks on potential reputational risk for UNEP were identified. Given the complexity and nature of the project, and mandate of UNEP, this type of risk should have been considered at design. Furthermore, the Environmental Social and Economic (ESE) Review Note included in the approved Project Document identified UNEP/HYPREP as a low-risk project. Given the nature of the project and context of implementation, the ESE screening decision does not seem to have identified the appropriate risk level to the project.	UNEP should review its Risk Log templates to prompt for an assessment of reputational risk and ensure that the appropriate level of safeguards risk is identified at project design.	Critical	UNEP-wide	UNEP Policy and Programme Division	6 months			