



**Andrew.Velthaus**  
09/04/2007 03:26 PM

Subject: GEF West Africa Regional Biosafety Project: US Comment

On behalf of US Council Member Kenneth Peel, I am writing to convey further technical comments on the West Africa Regional Biosafety Project for the GEF CEO to take into consideration prior to endorsement.

The United States appreciates the revisions that the World Bank has made to the project, which address many of the issues that we raised when the project proposal was first circulated in June 2006. In particular, we are pleased that the Bank has revised the project so it will build on the technical foundation already established in the region by organizations like INSAH and that the WAEMU project will collaborate with other regional biosafety initiatives and with ECOWAS. We also appreciate the expanded scope of the regional Biosafety Clearing House.

However, we are concerned about a new indicator that was not included in the June 2006 version of the proposal. A new proposed key performance indicator for the project is "the percentage of risk assessments incorporating measurements of: (i) presence or absence of contamination through gene transfer to wild species and the concentration level...." As written, it is not clear what will be measured and when. Risk assessment should be conducted prior to the release of LMO's, and therefore prior to any opportunity to measure gene transfer. Further, this indicator is inconsistent with the internationally accepted paradigm for risk assessments to be conducted on a case by case basis, which would determine whether any risk management measures would be warranted.

We request, therefore, that the World Bank revise this indicator prior to CEO endorsement so that it reads: "the percentage of risk assessments performed that take into account, inter alia, potential impacts arising from gene transfer." We also note that the success of the project as measured by all of the proposed indicators is dependant on the submission of applications for environmental release that would prompt risk assessment, and therefore outside the control of the project. Applications for risk assessment might well be lower than anticipated by the project. We would encourage the project to undertake risk assessments as training exercises, which could also be evaluated for meeting these indicators.

I am happy to discuss this request further with GEF Secretariat staff and/or World Bank staff.

Warm regards,

Andrew

Andrew Velthaus  
International Economist  
GEF and IFAD Desk Officer  
US Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Room 5406 F

Washington, DC 20220  
Phone: (202) 622-5575  
Fax: (202) 622-2023

-----Original Message-----

From: Mevidente@thegef.org [mailto:Mevidente@thegef.org] On Behalf Of secretariat@thegef.org  
Sent: Thursday, August 09, 2007 3:42 PM  
To: "Mr. Adolfo Rosellini~Lg=8289%011541148197413%Fax"@worldbank.org; james.hall@ausaid.gov.au; leander.treppel@bmf.gv.at; acklinsguy@yahoo.com; theo\_worou@yahoo.fr; raphael@mre.gov.br; helene\_corneau@acdi-cida.gc.ca; carlosm@maap.gov.cv; casml23cv@yahoo.com; gdoungoube2000@yahoo.fr; jzou@worldbank.org; mawaheb@eeaa.gov.eg; ncsa\_egypt@yahoo.com; depenvdg@eol.com.er; "Mr. Mogos Woldeyohannes~Lg=8289%0112911126095%Fax"@worldbank.org; Tiina.Jortikka-Laitinen@formin.fi; Hanna-Leena.Lampi@formin.fi; julien.rencki@dgtpe.fr; Anne.touret@dgtpe.fr; Sandrine.de-guio@dgtpe.fr; marita.steinke@bmz.bund.de; Vera.Rosendahl@bmz.bund.de; "Ms. Marita Steinke~Lg=8289%011492285353980%Fax"@worldbank.org; Dkumar3@worldbank.org; vvualnam@worldbank.org; "Mr. Eshagh Alhabib~Lg=8289%011982166703177%Fax"@worldbank.org; ludovica.soderini@tesoro.it; yasushi.oonishi@mof.go.jp; kazuteru.sato@mof.go.jp; tkajiwara@worldbank.org; rkabwaza@sdpn.org.mw; kabwaza@hotmail.com; Claudia\_grayeb@hacienda.gob.mx; ecopolicy@mediu.moldova.md; violeta.ivanov@gmail.com; gs.jong@minbuza.nl; eb@mfa.no; sshah2@worldbank.org; lakaykiko\_ox@yahoo.com; fsbravo@denr.gov.ph; "Mr. Anatoly Totskiy~Lg=8289%01174952548283%Fax"@worldbank.org; alejandro.nieto@meh.es; thomas.kolly@bafu.admin.ch; petipong@mnre.go.th; wsuraphruk@yahoo.com; j-wheatley@dfid.gov.uk; Joldersma, Dirk; Velthaus, Andrew  
Cc: ruzikdav@rambler.ru; interdpt@rambler.ru; zkhanl@worldbank.org; wardr@gob.bb; tina\_guthrie@acdi-cida.gc.ca; maria.alban@minrelext.gov.co; "Ms. Andrea Alban~Lg=8289%0115715627610%Fax"@worldbank.org; pastvinsky@env.cz; geeand@um.dk; MIL@um.dk; petgeb@um.dk; esid@ethionet.et; shimelisf@yahoo.co.uk; martinma@afd.fr; msarr@gamtel.gm; rvonkleist@worldbank.org; otengyeboah@yahoo.co.uk; apurnomo@menlh.go.id; rezvanianmasoud@yahoo.com; Claudia.mordini@tesoro.it; shuichi.takano@mofa.go.jp; nobuyuki.kikuchi@mofa.go.jp; "Mr. Shuichi Takano~Lg=8289%01181355018244%Fax"@worldbank.org; slutfi@worldbank.org; p.napica@micoa.gov.mz; "Mr. Vincent van den Bergen~Lg=8289%01131703391306%Fax"@worldbank.org; emilio.sempris@cathalac.org; nmotapinto@worldbank.org; khpark81@mofat.go.kr; environment@mofat.go.kr; silviu.stoica@mmediu.ro; elin.miller@foreign.ministry.se; anton.hilber@deza.admin.ch; chris.whaley@defra.gsi.gov.uk; reifsnnyderda@state.gov; griscombw@state.gov; matuszakjm@state.gov; nvtai@yahoo.com; nvtai@monre.gov.vn; undpgef@undp.org; john.hough@undp.org; gefprojects@unep.org; kristin.mclaughlin@rona.unep.org; Sheila.aggarwal-khan@unep.org; wbgefoperations@worldbank.org; Rkhanna2@worldbank.org; doug.taylor@rona.unep.org; Guadalupe.Duron@rona.unep.org; stapsec@rona.unep.org; GEFSEC@worldbank.org; theo\_worou@yahoo.fr; spconedd@yahoo.fr; mndiama@aol.com; astoure@hotmail.com; fdtoure@sentoo.sn; yfolly@yahoo.fr; dcblack11@yahoo.com; neko26charles@yahoo.com; komzem@tajnet.com; min-eco@elcat.kg  
Subject: GEF Projects circulated for Council's comments/information --

Regional (Benin, Burkina Faso, Mali, Senegal, Togo) BD; Antigua and Barbuda MFA; Regional (Tajikistan, Kyrgyzstan) LD

Please find attached letters of notification from Monique Barbut, GEF CEO and Chairperson, on the posting of the following project documents for the Council's comments/information.

#### Full-Sized Projects

1. Regional (Benin, Burkina Faso, Mali, Senegal, Togo): West African Regional Biosafety Project

<http://www.thegef.org/uploadedfiles/08-08-07%20Regional%20-%20West%20African%20Reg%20Biosafety.pdf>

(See attached file: 08-8-07 Council letter.pdf)

2. Antigua and Barbuda: Demonstrating the Development and Implementation of a Sustainable Island Resource Management Mechanism in a Small Island Developing State

<http://www.thegef.org/uploadedFiles/08-07-07%20Webposting-%20ID%201614-Antigua%20&%20Barbuda.pdf>

(See attached file: 08-07-07 ID 1614-Antigua-Barbuda-Demonstrating Dev-Sust Island Res-CEO Ltr to Council.pdf)

3. Regional (Tajikistan, Kyrgyzstan): Sustainable Land Management in the High Pamir and Pamir-Alai Mountains - and Integrated and Transboundary Initiative in Central Asia Phase I

<http://www.thegef.org/uploadedFiles/08-07-07%20Webposting-ID%202377-CEO%20Endorsement%20ltr%20to%20Council.pdf>

(See attached file: 08-07-07 ID 2377-Regional - SLM High Pamir-CEO Endorsement ltr to Council.pdf)

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**To:** Secretariat@Thegef.Org  
Gcoordination@Thegef.Org  
Pblissguest@Thegef.Org  
Mzimsky@Thegef.Org  
**cc:** Sgorman@Worldbank.Org  
Ccrepin@Worldbank.Org