GEF-6 replenishment – Second meeting (Delhi, 10-11/09/2013) Brazilian Delegation Comments on GEF/R.6/13/Rev.1

A) BIODIVERSITY

- The draft program is fully aligned with the recommendations of COP-10 to the GEF and CDB's Strategic Plan 2011-2020, which is very positive. The choice to tackle drivers of degradation is adequate.
- The development of Program 9, on the implementation of the Nagoya Protocol on Access and Benefit Sharing, shows that the GEF is prepared to contribute positively to the implementation of the Protocol ahead of its come into force. At this initial stage, he focus on capacity building and development of national frameworks and regional collaboration is well designed.

B) CLIMATE CHANGE MITIGATION

- GEF-6 will coincide with the negotiation of a new instrument under UNFCCC. The GEF can therefore contribute to assessments of countries' mitigation potential and she light on adaptation needs, a direct contribution to the negotiation process. But we need to make sure that the level of resources for national communications remains ambitious.
- Strongly disagree with the justification provided to the reduction of 10% in the CC program. While we recognize the need to enhance other programs, including chemicals, the justification provided by the GEF (Page 2) "given the emergence of new financial mechanisms, including the Green Climate Fund (GCF)" goes against UNFCCC agreements and the understating that climate finance needs to be **new** and **additional**. The governing instrument of the GCF (Decision 3/CP.17) itself clearly indicates that the Fund has to mobilize **new**, **additional**, **adequate and predictable financial resources** to developing countries". Bearing in mind that the GEF remains one of the most important financial instruments of UNFCCC, this finance gap is critical.

- On page 44, there is a reference to a new climate change regime. But Brazil understands that the Durban Platform for Enhanced Action (ADP) and its resulting instrument will be part of the UNFCCC regime. Suggest replacing this language for "instrument under the Convention applicable to all Parties".
- Page 55, para 52: in order to make REDD+ initiatives more attractive to the GEF, suggest including the following language: "prominent carbon pools in these ecosystems, in particular the development of the elements in paragraph 71 of Decision 1/CP.16".
- Page 55, para 53: Similarly, in order to encourage modality "payment for results" under GEF-6, suggest the inclusion of the following in the paragraph: "forest management. This Program may include results-based payments for mitigation in the forest sector following modalities of procedures agreed by UNFCCC".

C) CHEMICALS

- GEF-5 earmarked \$420m for chemicals, of which \$375m were targeted for projects on POPs (Persistent Organic Pollutants). The draft program for chemicals does not yet indicate level of resources for each subprogram. It is important to maintain the level of funding for POPs while ensuring adequate levels of funding for commitments under the forthcoming Minamata Convention, since GEF-5's resources were limited.
- On page 71, the document makes reference to SAICM (Strategic Approach to International Chemicals Management) as a decision *adopted* by UNEP's Governing Council. This is not right. SAICM was proposed by UNEP's Executive-Director, throughout the consultative process on financing chemicals, but since many pledges, particularly be developed countries were not embedded, the GC only *took note* of the proposal.
- On page 77, it is worthwhile to make a clear reference to the development of inventories for mercury, which are foreseen under the forthcoming Minamata Convention.

D) INTERNATIONAL WATERS FOCAL AREA STRATEGY

IW focal area strategy should broaden its approach, supporting initiatives of research and food security on South Atlantic and those that promote a better understanding of the role of Oceans on climate change and their impacts. It is mandatory to include the themes pointed as priorities on Rio+20 Summit (ref. A/RES/66/288) that are currently missing:

- · Measures to prevent the introduction and manage the adverse environmental impacts of alien invasive species;
- · Initiatives that address ocean acidification and the impacts of climate change on marine and coastal ecosystems and resources;
- · Addressing potential environmental impacts of ocean fertilization;
- · Conservation of coral reef and mangrove ecosystems and realizing their social, economic and environmental benefits.

E) AMAZON SIGNATURE PROGRAM

- The proposal is too focused on programs targeting work in protected areas, which are already a major focus of Brazilian policies and other GEF projects. The Program could be expanded to provide support to the development of non-timber forest products and add value to supply chains.
- Page 149, paragraph 105: what is the evidence to conclude that the New Forest Code will bring back high deforestation rates? The evidence points rather to an opposite direction: a sustained trend of decrease in deforestation rates in the Amazon since 2005.

F) SUSTAINABLE CITIES SIGNATURE PROGRAM

The initiative prioritizes Africa and Asia, despite available data from ONU-Habitat indicates that Latin America is the most urbanized region in the world. The Sustainable Cities program would be remiss if it did not reflect this tendency in its workplan. The environmental impacts of the strong urbanization process in Latin America are undeniable, as such, it is essential that increased funding be directed towards Latin America.

Brazil is recently implementing a national program on sustainable cities, the "Brazil+20", bridging intersectorial initiatives and multistakeholder engagement, and the interconectiveness of policies on local/national levels. Our experience could contribute to the development of methodologies and indicators, knowledge sharing, technology transfer and scaling up impact. The interconnection of the Brazil+20 program with Sustainable Cities initiative would unveil opportunities of knowledge sharing and multiplication of benefits.

It is also important to emphasize some points that are not very clear in the document and need to be mentioned, such as:

- Sustainable Construction Foster the use of green materials in construction, like bamboo wood, and their use on large scale. Promotion of bioconstruction techniques and technologies to reduce energy and water consumption.
 Technology transfer and development to produce low cost buildings.
- Urban Mobility and Transportation Development and implementation of innovative technological solutions that contributes to quality and higher efficiency of collective transportation and urban mobility in a inclusive way and with lower environmental impact.
- Waste Treatment To enhance the adequate solid waste and water treatment of sewage by promoting technologies that reduce costs of implementation and reduce environmental impact on water resources and soils.
- Sustainable energy systems Promotion of more efficient systems for generation, transmission and consumption of electricity, new technologies for biomass-based energy generation and innovative applications of existing renewable source energy.