

Japan's Comments on Programming Document (GEF/R.6/07)

1. Overall comments

The focus of GEF support:

We propose that the GEF strengthen its support to the following three areas: (1) regional air pollution control, (2) the conservation of rare animal and plant species, e.g. the reduction of poaching of African Elephants and Rhinos, and the countermeasures to invasive alien species, and (3) mercury reduction with respect to the Minamata Convention on Mercury to be adopted and signed in October 2013.

GEF6 programs reflecting lessons learned from the previous phases:

We would like to be certain that the GEF6 strategy will be developed based on the past experience and lessons learned such as findings of the OPS5. When comparing the GEF5 and the GEF6 results frameworks for six focal areas, some objectives/programs stay from the GEF5 and others are newly introduced or reprogrammed. We would like to request the GEF secretariat to include correspondence tables showing GEF5 and GEF6 programs by focal area objectives with explanation about why some continue and others are not. We would also like to know what was achieved and what was not in each focal area under the GEF5 on the basis of Results Frameworks used in the GEF-5 Programming Document. For areas which have not brought about expected results, we would like to understand the reasons behind that.

Multi-focal area activities:

As for possible multi-focal area activities to be tackled during the GEF6, we would like to have information about how each focal area, such as biodiversity, climate change, and others, would positively engage in such multi-focal area activities. This is to ensure that such projects bring sufficient synergies and are not formulated and implemented independently focal area by focal area.

Private sector engagement:

We would request tables illustrating prospective engagement by the private sector for each focal area activities, similar to the ones in the GEF5 programming document "Annex 1: expected private sector engagement outcomes for GEF-5," pp. 105-108, GEF/A.4/7.

2. Comments on each focal area

Biodiversity

✧ We would request more concrete information about the participation of the private sector in the biodiversity focal area activities, for example what the roles of the private sector are in GEF6 and how they are practically involved in projects. Especially, objective 4 deals

with Supply Chains of commodity products, and the engagement of the private sector is becoming more and more important. We request the GEF secretariat add information about the private sector engagement in the outcomes and indicator level as well.

- ✧ While we value that the GEF6 objectives and programs are developed in line with the Aichi targets, some of the Aichi targets are left out and we would like to understand the reasons behind that. For example, the support to develop and revise National Biodiversity Strategies and Action Plans (NBSAPs), which is an instrument to place the Aichi targets in the national biodiversity strategy and is related to the Aichi target 17, was included in GEF5 but not in GEF6.
- ✧ We place a high value on the programs related to coral reef conservation and the Nagoya Protocol.
- ✧ We propose to revise the scope of the Nagoya Protocol Implementation Fund as follows, as the description in the programming document is narrowly described compared to the original scope:
Nagoya Protocol Implementation Fund (NPIF) Support
78. The primary objective of the NPIF is to facilitate the early entry into force and create enabling conditions at national and regional levels for implementation of the Protocol. The Fund supports, among others, existing opportunities leading to Projects funded through the NPIF will support the development and implementation of ABS agreements between providers and users of genetic resources that include the three core key elements of the Nagoya Protocol on ABS: PIC, MAT, and Benefit Sharing Providers. (The following sentences remain the same.)
- ✧ Program 7 (coral reef ecosystems) is primarily to conserve coral reef ecosystems, not directly targeted to contribute to the sustainable use of marine resources brought by coral reef protection. Thus, we suggest this program be placed under objective 1 (protected area systems) rather than objective 3 (sustainable use).
- ✧ As output 10.1 (Fully developed valuations of biodiversity and ecosystem services at national scale which have been incorporated into decision-making processes) is unrealistic as an output, we propose to revise as follows:
“Valuations of biodiversity and ecosystem services at national scale which have been considered for decision-making processes”

Chemicals

- ✧ Taking into account that the GEF6 and the transitional period until the Minamata Convention on Mercury become effective partially overlap, it is rational that the GEF6 places priority on “early action (paragraph 27, e)”. We assume that early action includes activities to prepare domestic laws and regulations for countries to ratify the convention and to develop national implementation plans and emissions inventories. As UNEP

expects that the convention to be effective in 2016, we suggest that the programing document clearly state that such activities be conducted in line with the guidance on an indicative list of categories of activities to be developed by the COP at its first session.

- ✧ It is effective to explore synergies and co-benefits of GHG and mercury emissions reduction, and this approach should be strengthened. For example, coal-fired power plants are primary unintentional sources of mercury emissions; thus, by installing equipment for dust removal, desulfurization, and denitration to those plants, the emissions of environmental pollutants, including mercury, possibly reduces. Considering that the size of chemicals and waste cluster may be relatively small, it is recommended the cluster closely coordinate with other focal area activities to benefit from additional resources allocated to those focal areas.
- ✧ Regarding green industry and green chemistry stated in paragraph 52, although we acknowledge the importance of tackling upstream measures in chemicals management and facilitating the private sector engagement in the chemicals area, thorough consideration would be needed to identify how far the GEF expands its support to the activities directly supporting the private sector. Green industry and green chemistry can be rather treated in the context of the Strategic Approach to International Chemicals Management (SAICM), as chemicals in products, hazardous substance within the life cycle of electrical and electronic products, and lead in paint are dealt with as emerging policy issues in the SAICM.

Climate change

- ✧ The detailed design of the Green Climate Fund is currently underway at the GCF board, and it is not easy to discuss the relationship between the GEF and the GCF at this stage. However, it would be requested that the relationship and roles of the two be clarified in the near future. For the time being, the GEF's support to climate change mitigation needs to be continued.

Regional air pollution

- ✧ Given the benefits for regional air pollution control by reducing particulate matters and tropospheric ozone as well as the potential benefits for climate change mitigation by reducing black carbon as a kind of particulate matters and tropospheric ozone, we suggest that the GEF6 allocate sufficient resources to this area. We request the GEF secretariat to consider feasible approach to mainstream assistance in this area in the framework of the GEF, and to present options by the next replenishment meeting.

Oceans and Seas

- ✧ Japan fully appreciates the importance of sustainable fishing practices and supports GEF's effort in this area. For sustainable fishing practices, appropriate regulation on overcapacity

and international trade is indispensable and capacity building in developing countries is of great importance in this context. Japan thus requests GEF to concentrate its efforts on capacity building in developing countries in these fields.

- ✧ The problem of overexploitation is mainly occurring in EEZ, especially EEZ of developing countries, rather than in the high seas which covers only 10-15% of the global fishery yield. As Regional Fisheries Management Organizations (RFMOs) have already been addressing overexploitation and illegal unreported and unregulated fishing, GEF should focus on enhancing the management capacity of coastal developing countries in order to back up and promote the overall efforts of RFMOs and each country.

Sustainable cities

- ✧ Environmental problems accompanied by urbanization have become apparent. Greenhouse gas emissions in cities account for about 75% of total emissions, and problems related to air pollution, waste, and drainage water have become severe in cities in many developing countries. A co-benefit approach would be useful to address these problems concurrently. Given the importance of environment for sustainable development, we strongly support to have a sustainable city signature program.