

## **Austrian Comment on the Draft GEF-6 Programming Directions Chemicals Strategy**

We welcome the GEF-6 Programming Directions for the Chemicals Strategy and support in general the line, which has been proposed.

We appreciate the GEF's acceptance of the integrated approach for financing options for the chemicals and wastes sector, which has recently been decided at the UNEP Governing Council, which includes the creation of a focal area for the chemicals and wastes.

We also appreciate the activities, which have been carried out by the GEF in relation to Mercury and SAICM so far as well as the GEF's intention to continue supporting these areas.

As regards the details, we are of the view that new developments, such as the recently agreed convention on mercury (future Minamata Convention) and the afore-mentioned decision of the UNEP GC on an integrated approach for the chemicals and wastes sector, should receive more consideration as it has been foreseen in the current draft. Parts of the document, where this could be taken into account, are:

Page (further on p.) 111, vi.

The last sentence should be extended and then could read: "In addition, the UNEP Governing Council in February 2013 invited the GEF to consider the integrated approach in the context of its 6<sup>th</sup> replenishment to revise its focal area structure and strategy in order to address the chemicals and wastes agenda, and consider ways of further strengthening its relations with the conventions it serves as a financial mechanism.

p.116, 25.

At the end of para 25 (which relates to the support for the Mercury Convention) it should be added:

"In providing resources for an activity, the GEF Trust Fund should take into account the potential mercury reductions of a proposed activity relative to its costs.

Under the GEF-6 strategy, GEF projects in relation to mercury should focus on supporting the interim period of the Minamata Convention and also on institutional strengthening."

p.117, 27.

The suggestions under point 27 seem very much focussed on POPs only.

p.118

As regards the strategic objectives and programs (Strategic objective 1 with program 1 and 2), we are of the view that reporting should not have the highest priority, therefore, e.g. “national plans...” should come before convention reporting. In addition “institutional strengthening”, which incorporates other sorts of capacity building and enabling activities, should be included.

The same is valid for p.120.

p.121, 40.

The foreseen outcomes are partly very general, one could establish a stronger relationship to the targets of the conventions and add:

“v. Countries meet their convention obligations” (or implementation objectives).

Under point 41, same page, an “iv. Reduction of tons of mercury” or any other significant indicator for mercury reduction should be added.

p.123, 51. Indicators

Mercury should be included (for example under i.).

The same is relevant for p.127, 71. Indicators. An indicator for mercury should be included. Point 71 is, additionally, lacking any indicator in relation to the Montreal Protocol and SAICM.

p.128, Annex 1

In the column for “expected outcomes and indicators” seems to be based very much on previous activities, however, mercury and SAICM etc. should be taken into account as well.

p. 133, GEF Small Grants Program

We very much appreciate the small grants program of the GEF and any activity which aims at supporting LDCs and SIDS. In this respect we are of the view that the SGP of the GEF should be more elaborated and developed.