FOCAL AREA STRATEGIES FOR GEF-4 – WORKING DRAFTS AND PROPOSED PROCESS

ADDENDUM

The attached comments received from the Netherlands should be included in Annex I of document GEF/C.30/5.
Netherlands comments on the draft GEF Focal Area Strategies

Land degradation
The strategy connects well with the Netherlands policy on land degradation, with sufficient emphasis on implementation, dialogue, policy integration and strong national ownership and involvement in the implementation. Country plans will need to be explicit on the results foreseen and timelines. It is recommended to denominate the contribution of this focal area to MDG 1 and 7.

The first three strategic objectives seem to be adopted from the three dimensions of TerrAfrica (WB/NEPAD); coalition, investment and development and management of knowledge. The fourth objective (cross focal area synergies and integrated ecosystem approaches to SLM) reflects the specific positioning of GEF and strengthens the GEF objective to create synergies among focal areas. Indeed we feel this is an important objective, not only at the level of the financial mechanism, but also within the scope of the conventions relevant to SLM. The synergies between UNCBD; UNFCCC; Ramsar Convention; UNFF; the African Convention on Conservation of Natural Resources, and the UNCCD need to be strengthened.

The involvement of stakeholders has been underscored in the draft document. What we miss however is the mentioning of new business opportunities for domestic investment. To extend the area of sustainable managed forests, we need significant domestic investment, and business development. New business models need to be explored. The role of private banks (i.e. micro credits) should not remain unmentioned, as well as opportunities offered by carbon credits (bio fuel) and other financial instruments.

Climate change
The draft paper looks more like an informative sheet than a strategy clarifying objectives and proposed results, and will need some redrafting in that sense. Since both inputs and outcomes differ a lot for mitigation and adaptation, it could be worthwhile to draft separate strategies for both areas, all the more since adaptation to climate change does not provide direct global benefits and is typically a mainstreaming area.

The Netherlands supports the distinguishing in priority and low priority areas. It is not right, however, to base this categorization solely on the expected portfolio composition. Priority setting should be based on policy decisions. Low GHG emitting electricity generating technologies for example are not less a priority because there is ‘little work’ in this area, or because GEF does not expect to expand its operations here in the short term. Therefore we suggest the following:
- including two instead of three categories in the strategy (first and second priority) and clarifying what choices will be made in case of competing interests;
- including OP7 in the ‘high priority’ category, notwithstanding the fact that activities in this field are of relevance only to a small proportion of countries with significant implementation capacity. The area has been appointed as a high priority in the WB Investment Framework for
Clean Energy and Development, and we think it recommendable that GEF contributes to its success, were feasible.

**Biodiversity**
This document requires some major changes and editing to make it an understandable and effective strategy. The set up could be much clearer. We recommend a more convenient presentation, such as for example in the strategy for POP and land degradation (see below). Prevent fuzzy language (e.g.: It stays unclear until page 8 what the fourth strategic objective will be. What is meant with ‘biodiversity friendly managed landscapes’?)
The strategy text should put much more attention on sustainable use of biodiversity and the human development dimension, since this covers the actual state of art in the UNCBD, and because Official Development Assistance is the principal source of funding for the GEF. Even in the scope of ‘Protected Areas’, due attention should be given to the linkages between poverty reduction and biodiversity conservation.

Dissemination of good practices (like capacity building and the policy – practice linkages) should be part of every strategic objective and not be not a separate one. Concerning ABS, and other mainstreaming issues, it is important to adress the development of effective international regimes for ABS, and not only domestic capacity building.

The strategy pays little attention to partnership and cooperation. Much more reference is needed for example to opportunities for partnership with the private sector and other stakeholders. Besides the strategy should more eye for regional activities.

**International waters**
From the current document it is difficult to deduce the expected results and the ambitions for GEF4. The strategy connects well with international consensus in the field, including the objective to contribute to MDG and WDDS targets. Also ecosystem values have been integrated sufficiently. Herewith the strategy is comprehensive and consistent, but it may be overambitious. Both indicators and possible outcomes are quite vague and preliminary and need to be specified.

There is a lot of juggling with objectives, concerns and targets in the document. The introduction explains that OPS3 documented good results in achieving the first objective for the GEF IW Focal Area; ‘to foster international, multi-country cooperation on priority transboundary water concerns through more comprehensive, ecosystem-based approaches to management’. Are we now moving forward to the second objective, or will the two objectives in para. 2 be replaced by the three strategic objectives in para. 5? What is the importance of the four major concerns in para. 4? How do we understand the list of principles in para. 7? Are these linked to the objectives? What is the meaning for example of identification of a few strategic areas of portfolio growth including new geographic areas, demonstration activities, and contributions to conflict resolution and stability, with a focus on groundwater and SIDS in response to STAP guidance’ as a principle to manage the portfolio?
We miss an explicit link to other relevant programmes such as the UNEP GPA. Besides we miss stakeholder participation (end-users!) in the strategy.

GEF focal area strategy for persistent organic pollutants
Very clear and result oriented strategy. No comments. The set up of this strategy could an example for all the strategy documents (Mission; Strategic Objectives; Anticipated evolution of priorities under GEF4; Strategic objectives for GEF4).

Ozone layer depletion
Very clear and result oriented strategy. No comments, only a question: In the Montreal Protocol possible practical solutions related to the destruction of HFC-23 in new HCFC-22 facilities, have been discussed. Could the GEF, through the focal areas for Persistent Organic Pollutants, Climate Change, Ozon Layer Depletion, or through the Strategy to address the cross cutting issue of sound chemicals management contribute to this?

GEF strategy to address the cross cutting issue of sound chemicals management
The introduction is unnecessarily long and descriptive, herewith unwillingly strengthening the image that this strategy is quite vague and not very result-oriented. Some editing is necessary here. We do not need the information in para. 2 and 3 to understand why the GEF should be interested in chemicals management. Policy issues have been concluded and decided on. What is needed is a strategy that convinces the GEF council that chemical management is well addressed throughout the focal areas of GEF. Part II is therefore very interesting, but does still not make clear how the new incentive towards chemical management is been dealt with. Is it all a matter of better reporting on existing activities, or will our contribution improve and expand?

Para 5. We do not agree with the first sentence. On the contrary, we feel that the ‘broad acknowledgement’ mentioned here is lacking in many developing countries. It is reality that many developing countries do not see themselves confronted (yet) with problems related to the use and production of chemicals, while many ‘developed’ countries struggle with management issues. From the thirty-six Netherlands partner countries only one (Albania) has mentioned chemical management as a priority for cooperation. Since we try to work in a country driven manner within the GEF basing the interventions on existing priorities, we think we should prevent to generalise too much.

Para 9. on adaptation to climate change seems to be a bit forced. No wonder, since adaptation is a cross cutting issue itself, linking to every other focal area of the GEF. We do not think it is necessary to explain the linkages among the various cross cutting issues.

Para 13. it is not very clear to us in what way this targeted research will be organised. Is this the contribution of STAP? Will it be country driven? Or does it take place within a GEF focal area?

Support to sustainable forest management across the GEF focal areas
We very much welcome the effort of the GEF Secretariat to draft this paper clarifying the expected contribution of GEF4 to sustainable forest management. This is extremely important, considering our aim to address the SFM-elements within the conventions to which the GEF serves as a financial instrument and the ongoing discussions within the scope of the UNFF negotiations. The relevant elements of UNCBD, UNFCCC and UNCBD policies have been listed smartly in the first paragraph. We are not sure however about the statement in para. 2 about the importance given to each of these elements within GEF project interventions so far. We think that the subject could be dealt with somewhat better and that the present strategy is a first step to do so.

The documents is clear in its presentation how the GEF expects to expand its engagement in SFM beyond current practise, and states that a review of the incrementality of selected activities need to be executed. A similar review could certainly be part of our efforts to develop operational guidance in this field. We understand that besides incrementality issues certain other external or internal barriers may exist to implement SFM activities within the GEF portfolio (see also the remarks on these barriers in para 7(a) of the present draft). We believe that these possible barriers should be analysed together with the review of incrementality. It is recommended to refer to the possible contribution to MDG 1 and 7 and the social aspects of SFM, besides the conservation goals.