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COMPILATION OF TECHNICAL COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON WORK PROGRAM
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NOTE: This document is a compilation of technical comments submitted to the Secretariat by Council members concerning the project proposals presented in the Work Program approved by the Council on June 24, 2009.

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WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (REFERENCE TO GEF C.35/7)
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GENERAL COMMENTS

COMMENTS FROM SWITZERLAND

1. As usual, Switzerland comments on a number of PIFs out of the Work Program. It is our intention to point at those aspects of project design that could lead to weaknesses at implementation stage, once the final project documents are not sufficiently clear. Thereby we want to further increase the quality of GEF projects and programs.

2. Out of the PIFs reviewed, the following seem to be the most critical and require special attention:

- **N°24: Algeria: Integrated approach for zero emission project development in the new town of Boughzoul**

The objectives of the GEF component are important and the concept is overall well designed. However, as per information available, implementation of the overall project seems already to be ongoing. Therefore there are doubts about the role to be played by and the efficiency of GEF involvement at this stage of implementation. Environmental objectives should be integrated into project design as early as possible, otherwise the potential to influence project design is lessened and the cost-effectiveness of the environmental investments is reduced.

- **New Programmatic Approach on BD: India Coastal and Marine Programme**

At a first glance, the programme seems well defined. Nevertheless, quite a lot of crucial issues are treated so far in marginal manner and need further attention, particularly: impact, baseline, the role of the legal framework and of its enforcement, cooperation with the private sector, institutional arrangements.

- **New Programmatic Approach on IW: Sustainable MED**

Particularly there are doubts regarding co-financing: (a) does the co-financing given really exclude baseline financing (as by GEF rules), and (b) is it correct to consider as co-financing contributions from other GEF projects, which are financed by GEF source?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

BIODIVERSITY

1. Regional (Central African Republic, Congo, Cameroon, Gabon, Equatorial Guinea, Congo DR) : CBSP Sustainable Financing of Protected Area Systems in the Congo Basin [UNDP]

COMMENTS FROM GERMANY

1. Germany supports the project in principal but wishes to have more information.
2. The overall project concept makes sense in our view and but we follow the position pronounced by STAP, stating that a minor revision is required in view of the existing risks that additional revenues generated by PA systems (as in complementary outcome III) will lead to a crowding out of original government financing.
3. A recent consultative meeting on ministerial level in Libreville (May 8) has shown that the governments of the Congo Basin countries are still very reluctant in respecting their commitment to install an autonomous financing mechanism. The update of national policies aimed at committing governments to take action needs to be stressed as a priority over revenue generation. For the moment the budget allocated to enhanced revenue generation (indicative GEF financing) outplays the legal framework budget considerably. We further question whether COMIFAC as an executing partner will receive financing at the ministerial level, the Secretariat or through its mandated institution for protected area development, the Regional Protected Area Network (RAPAC). Since project implementation will mostly occur on the national level, COMIFAC would probably play a more coordinating role. This point is an extremely critical one.
4. With 86% co-financing, significant coordination among participating partners is needed for attaining the expected project outcome. The project proposal does not make any suggestions as to how to coordinate this co-financing strategy.
5. We also question the strategy to base the expected strengthening of the institutional framework first of all on a quantification of the economic values of PAs (see expected output 1 for project component 1). Generally spoken, the expected outcomes and outputs seem quite optimistic: an overly ambitious time frame (5 years: implementation 2011 completion 2016) cannot be compensated by financial means. Significant coordination efforts will be necessary, especially in the beginning of implementation. Further clarification and possibly reformulation/modification is needed during the project preparation phase.

6. Concerning Point 13 (“*the project will provide timely financial and strategic assistance to local communities, NGOs, other civil society groups and governments to ensure long-term protection and sustainable natural resource management of globally important priority PA systems across the Congo Basin forests*”) further clarification is needed regarding the definition of “assistance”: how and in which form it should be provided. We insist on clarifying the aspect of “timely” assistance: a degressive (exit) strategy needs to be included in the initial concept. Experiences from other GEF/UNDP projects have shown that financial contributions on local/community level tend to have negative impacts and are not sustainable in their expected positive outcome.

COMMENTS FROM SWITZERLAND

Overall Comments

7. The project objective is to have in place capacities, institutional frameworks and model mechanisms for the long-term financial sustainability of PA systems and associated ecosystems within the Congo Basin.

8. The PIF underlines the importance of the Congo basin for biodiversity and global climate and specifies the key threats to biodiversity. It also states that despite the efforts made with the establishment of Protected Areas, the trend of biodiversity loss on the ground is not improving significantly, among others due to the fact that the PA systems within the Congo Basin operate at extremely low levels of human and institutional capacity, and receive only a minimal proportion of the funding needed to cover the capital investments needed and basic operating costs. In consequence, the project puts emphasis on the improvement of the PA systems and of its financial sustainability.

9. Overall the project is consistent with GEF criteria, strategies and programmes. Basically it seems well conceived and well focused. We also welcome that there is substantial co-financing.

Questions, Concerns and Challenges for further Programme Refinement

Threat Reduction

10. Although the approval of a threat reduction strategy is explicitly mentioned below the expected outputs of component 1 (legal, policy and institutional frameworks), the project’s role and targets to implement that strategy are not clearly outlined.

11. Following the project framework, higher priority seems to be given to innovative revenue generation than to threat reduction.

12. We recognize that the current project has the potential to improve substantially the management of the PA systems concerned, but to alter facts on the ground it will also be essential to take up and explicitly deal with the threats to biodiversity.

Conclusions and Recommendations

13. We fully support the current project, recommend its approval and hope that in further planning more attention is given to the issue of threat reduction.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

14. The project's objective is to put in place capacities, institutional frameworks and model mechanisms for the long term financial sustainability of PA systems and associated ecosystems within the Congo Basin.

15. France clearly supports this approach which will ensure the long term sustainability and the best impact of on-going ambitious conservation initiative in the Congo Basin.

16. The project objectives seem ambitious with, by the end of the project, at least 50 % of estimated costs of necessary core operations for PAs covering at least 5 million ha, being reliably and consistently funded, and at least 50 % of estimated costs of comprehensive management for PAs covering at least 1 million ha being reliably and consistently funded.

17. *The PIF doesn't provide indications on how these costs will be assessed. They should need proper and detailed financial gap analysis for the concerned PAs system, which seem not to be funded and implemented by the project.*

18. Moreover, establishing sustainable financing schemes is usually a long term process. In this regard, the project duration of 5 years seems limited (for not to say unrealistic) to tackle all the project objectives if it envisions the creation of new financial trust funds or financial mechanism.

19. *The project should clarify how it will foster existing or already well engaged sustainable financing schemes.*

20. The project should also try to shorten transaction costs and learning cycles *by increasing practitioner to practitioner's exchanges of experiences, south – south exchanges of experiences between Conservation Trust Funds Managers and PES scheme managers.*

21. One concrete translation of this recommendation could be to increase exchanges with Latin American Countries who have advanced experiences with innovative financing schemes for biodiversity conservation (see Rapid review of Conservation Trust Fund experiences, May 2008 at:

http://www.redlac.org/index.php?option=com_rubberdoc&view=doc&id=48&format=raw&Itemid=177&lang=en)

Opinion: Favourable subject to the above consideration.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**2. Regional (Cameroon, Kenya, Madagascar, Mozambique, Senegal, South Africa) :
Supporting the Development and Implementation of Access and Benefit Sharing Policies in
Africa [UNEP]**

COMMENTS FROM GERMANY

22. GTZ is foreseen as executing agency for this project. The comments of the STAP review will be taken into consideration when developing the full project proposal.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

23. The project is part of a broader scheme launched in 2004 to assist 15 African countries in the finalizing/revising of their national regulatory frameworks on Access and Benefit Sharing (ABS).

24. Concerning its general principles, the project support is focused on technical assistance with a view to build local capacities. It is not clear though where the expertise is going to come from while it is obvious that some of the partner countries do host competent experts. So, the use of local expertise should be a project priority when this expertise is available.

25. Turning to financial aspects, the proposal raises two issues:

- The co financing ratio of 38% appears quite low. We would expect private sector involvement on this ABS topic particularly when it comes to develop pilot business initiative.
- The resources are stretched thin due to the numbers of components and countries and a limitation of the ambitions of the project should be considered to ensure good results. It is for example questionable that pilot business initiative can be supported with a budget of 7 000 USD per initiative (global budget = 85 000 USD for 6 countries and 2 pilot initiative per country).

Opinion: Favourable with a recommendation to focus resources on less activities and identify extra co financing.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

3. Regional (Antigua and Barbuda, Grenada, St. Kitts and Nevis, St. Lucia, St. Vincent and Grenadines) : Sustainable Financing and Management of Eastern Caribbean Marine Ecosystems [World Bank]

COMMENTS FROM GERMANY

26. (Project) can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

27. The project's objective is to improve the management effectiveness of existing and expanded Protected Area networks across the Eastern Caribbean through the establishment of sustainable financing mechanism.

28. France supports this approach which is key to ensure the long term sustainability and the best impact of recent effort in increasing marine conservation in the eastern Caribbean.

29. The PIF surprisingly intends to contribute to the expansion of the MPA networks in the region, by supporting the designation of at least one marine protected area per country, while it's already recognized that existing MPAs are already facing financing gap and sustainability issues. *It would be more cost efficient to secure the sustainable financing of existing MPA network instead of expanding the problem by expanding the number and size of MPAs.*

30. In the same consideration, the PIF recognized that "*poorly planned and regulated coastal development (and the associated issues of land based sources of pollution, sedimentation, habitat destruction and increased human activities)*" are growing threats to marine environment conservation in the region, but is not providing proper means and target to tackle them. Again, *instead of creating new MPAs and expanding their number, the project should try to provide sustainable financing mechanism to tackle land base pollution, source of sedimentation, and habitat destruction already threatening the existing MPAs of the Eastern Caribbean.*

31. At last, the Project envisions establishing a regional endowment fund and five national trust funds. While establishing national trust is relevant, if they first, and foremost, focus on securing sustainable financing of existing MPAs, the justification for the establishment of a regional endowment remains unclear and not convincing.

32. A regional endowment would be relevant only if regional conservation initiatives were to be implemented, which could not be implemented at the national level. This regional endowment can create some additional overheads to national trust funds if this regional fund is

not capitalized while there is currently no regional marine conservation initiative going on (or in project) with adequate financial gap analysis and business planning. Without such regional marine conservation initiatives, the creation of a regional endowment appears to be rushing things. By the way, the governance of this regional endowment is not even anticipated.

Opinion: Favourable subject to the above consideration.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**4. Argentina : Inter-jurisdictional System of Coastal-Marine Protected Areas (ISCOMPA)
[UNDP]**

COMMENTS FROM GERMANY

33. We support the development of the PIF into a full project proposal. The description of the problem and the corresponding strategy to solve it (proposal with its 3 components) are very appropriate. We suggest to increase the financial collaboration and strengthen an active participation of the oil industry for the realization of the project and afterwards, since this industry plays an important role in the region and should be made more responsible for the sustainable management of ecosystems.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

5. Bolivia: Biodiversity Conservation through Sustainable Forest Management by Local Communities [UNDP]

COMMENTS FROM GERMANY

34. Germany supports the project in principle but asks for further clarification.

35. While adequately addressing underlying causes and drivers of deforestation and forest degradation in the Amoro-Madidi corridor, which is highly relevant from the BD perspective, the project design may be over optimistic in seeking substantial increases of income at household and community levels as a result of community forest certification: To date no significant premium prices (except for few products in niche markets) for certified timber have developed; this is especially true for national markets. The challenge of reaching AND maintaining forest certification according to FSC principles and criteria will present a substantial challenge for the communities.

36. In addition, the current national Government has expressed in several situations a critical position towards forest certification. In the project preparation phase, this attitude should be monitored.

37. As an additional line of work, the project could help to strengthen the FSC National Initiative in order to maintain/ improve/ increase FSC involvement in community forestry.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

6. Brazil : Integrated Management of the Ilha Grande Bay Ecosystem [FAO]

COMMENTS FROM GERMANY

38. (Project)... can be supported without a need for further comments.

7. Cameroon : CBSP Sustainable Community Based Management and Conservation of Mangrove Ecosystem in Cameroon [FAO]

COMMENTS FROM GERMANY

39. Germany supports the project. However, for clarification it would be helpful to get more information about the role of IUCN and the capacity of CEFDHAC to play a meaningful role in civil society participation.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

40. The project will try to put in place planning, managing and monitoring capacities, institutional frameworks and consultative mechanisms for the long term sustainability of the mangrove forest ecosystem and their biodiversity through participatory and inclusive participation of communities and other key stakeholders.

41. The project overall assumption is not convincing. It anticipates that “*effective collaborative management and sustainable use of mangrove resources, participatory restoration activities, as well as better representation of mangrove ecosystems in the existing network of protected areas will achieve improved protected area system sustainability and management [...]*”.

42. Collaborative management, participatory restoration activities and better representation of mangrove ecosystems in the PA system is not answering the economics reasons for unsustainable use and harvesting of Mangrove ecosystem products, particularly wood for fire or construction. This assumption doesn't provide practical and realistic alternative to the current unsustainable use of mangroves by local communities.

43. This GEF council is already reviewing another PIF for establishing “Sustainable Financing of Protected Area Systems in the Congo Basin” which considers that the current PA system of the region is not self financed and sustainable on the long term. Integrating mangroves areas in the existing PA system of Cameroon which is not yet self financed and sustainable is not a guarantee of conservation.

44. By the way, the PIF recognizes (in chapter F on Incremental reasoning p7) that this project is not providing a sustainable phasing out strategy: “The project will develop a baseline for long term actions that will continue after the project through governmental, bilateral or other funding”.

Opinion: Favourable if during the next step clear answers can be provided to questions:

- **How will the project support economically sound and sustainable alternative livelihood to the existing unsustainable use and extraction of Mangroves resources?** (Collaborative management, participatory restoration activities and integration of mangrove areas in the Cameroon's PA system are not economically sound and sustainable alternative livelihood to the existing use and extraction of Mangroves resources).
- **How will the project secure the sustainability of its activities without relying on unpredictable and unsecured "governmental, bilateral or other funding" after the end of this project?**

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

8. Central African Republic : CBSP Strengthened management of the national protected areas system through involvement of local communities [UNDP]

COMMENTS FROM GERMANY

45. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

46. The project's objective is to conserve globally important biodiversity through strengthened community-based management of consolidated protected area network in the Central African Republic.

47. The project intends to devolve some biodiversity conservation responsibilities to local community by developing co-management approaches. This overall vision seems relevant if one considers that most CAR's protected areas "only exist on paper due to a lack of human, technical and financial resources".

48. The overall project objective is sound and relevant, but the project approach seems not comprehensive and sufficient.

49. Co-management is not meaning that local stakeholders can take over the responsibilities from government and manage PAs on their own, without support from the official government staff. That means that if the Government cannot provide human, technical and financial resources to control and support the co-management agreements, the local communities or private enterprises could be discouraged and gives up the co-management framework. This is particularly the case with the problem of enforcing regulations or financing recurrent costs that local communities or privates stakeholders are not legally or financially able to bare.

50. *The project should yet provide some realistic proposals to secure core support from government staff and sustainable business planning of co-management schemes for both Protected Areas (Basse Lobaye Biosphere Reserve and Mourou Fadama Ndanda multiple use area).*

Opinion: Favourable subject to the above consideration.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

9. Costa Rica : Consolidating Costa Rica's Marine Protected Areas (MPAs) [UNDP]

COMMENTS FROM GERMANY

51. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

52. The project will aim to consolidate Costa Rica's marine protected areas (MPAs) by increasing their ecological representation and ensuring their effective management and financial sustainability.

53. The project concept is sound, relevant and backed by a strong political will, but its main objective is to expand the marine areas under protected status and to provide a sustainable financing solution, without any consideration of the alternative for unsustainable fishing activities.

54. *The FFEM is already supporting the UNDP/GEF project "Improved management and Conservation Practices for the Cocos Island Marine Conservation Area".* The PIF is not reflecting the huge conflicts that the Cocos Island Marine Conservation area is facing with artisanal and industrial fishing activities. A huge illegal fishing pressure is threatening the National Park of Cocos Island without any alternative solution for sustainable fishing activities in other Costa Rican waters.

55. The fact is that currently no alternative solution is in discussion to the closing and the expansion of the marine protected areas around Cocos Island and more broadly in Costa Rica. Negotiations with the INCOPECSA organization are not progressing if not to say in a stalemate.

56. Another critical issue is the shark finning industries which is still putting threats to sharks populations in Costa Rican waters, because of inadequate legal framework and enforcement, but also no alternative fishing solutions.

57. *The project concept needs to be complemented with sustainable fisheries proposals and proper means to support negotiations with fishermen organizations. If the project is not able to support alternative fisheries solution negotiated with fishermen organizations, this project, which intends to increase the marine areas under protection, will result in fact in a tremendous increase of conflicts.*

Opinion: Favourable subject to the above consideration.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

10. Cuba : Enhancing the Prevention, Control and Management of Invasive Alien Species in Vulnerable Ecosystems [UNDP]

COMMENTS FROM GERMANY

58. It is not clearly outlined how civil society will be incorporated into the project. Participation of a wide range of stakeholders, especially the local population, is often the essential strategy to achieve long term success.

59. It should be discussed if not more pilot areas would be necessary. Additionally it should be reconsidered how to incorporate more institutions and the civil society in the project implementation in the pilot areas. The sustainability of success would increase if there is more than one institution responsible for the implementation.

60. In relation to the other components, the costs for institutional capacity and strengthening seem to be very high.

61. The Project Identification Form exceeds with the amount of 10 pages the generally recommended 4 pages for Project Identification Forms considerably.

COMMENTS FROM SWITZERLAND

Overall Comments

62. The PIF is presented under GEF's Strategic Objective 3 "*To safeguard biodiversity*" of the Focal Area Biodiversity. The project fulfils eligibility criteria under Strategic Programme 7 "*Prevention, control and management of invasive alien species*". The project also contributes to Strategic Objective "*To mainstream biodiversity in production landscapes/seascapes and sectors*" and its programme 4 "*Strengthening the policy and regulatory framework for mainstreaming biodiversity*".

63. The project aims at strengthening the institutional and policy framework for preventing, controlling and managing invasive alien species, enhancing the capacities of relevant protagonists, and coordinating actions of all stakeholders in the field with the objective of safeguarding globally significant biodiversity in vulnerable ecosystems in Cuba.

Questions, Concerns and Challenges for the further Project Preparation

- Criteria for identification of the seven biodiversity-critical protected and productive areas?
The PIF does not provide information/reasons/criteria about the identification of the seven areas selected for activities in the field. We have strong concerns regarding the effectiveness of the adopted site-based approach and strongly recommend considering a species-based approach, according to national priorities.
- National Capacity Self-Assessment (NCSA) for Global Environmental Management
Are there synergies between the GEF project "National Capacity Self-Assessment (NCSA) for Global Environmental Management" in Cuba (ID-2064) and the present one?

Conclusions and Recommendations

64. We support the current proposal and recommend to the GEF the approval of the current PIF, expecting obviously that the above questions are resolved in further planning.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**11. El Salvador : Mainstreaming Biodiversity Management into Fisheries and Tourism
Activities carried out in Coastal /Marine Ecosystems [UNDP]**

COMMENTS FROM GERMANY

65. Germany supports the project proposal but would like to see that the comments provided by the STAP are taken into account in the further development of the project proposal.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

12. India : IND-BD Mainstreaming Coastal and Marine Biodiversity Conservation into Production Sectors in the Godavari River Estuary in Andhra Pradesh State [UNDP]

COMMENTS FROM GERMANY

66. In the document the challenge presented by climate change is considered a risk and not an integral part of the project concept. On the other hand the expected sea level rise among others will have considerable impacts on biodiversity and natural resource management and proposed measures should have the impacts of climate change in mind. From the point of view of mainstreaming, it might be even more successful to clearly focus on the positive contribution biodiversity conservation can have on climate change protection measures than to take climate change as a risk and that conservation measures generally will positively contribute to resilience.

13. India : Strengthening the Implementation of the Biological Diversity Act and Rules with Focus on its Access and Benefit Sharing Provisions [UNEP]

COMMENTS FROM GERMANY

67. **On Component 1:** As stated in one of the excellent publications on the GIST website mentioned in the PIF it is difficult to assess the value of genetic resources for two basic reasons. One reason is mentioned in the STAP review – the methodological reason – what is the basis for calculation and which calculation method is applied, which value is being calculated. The second reason builds on the fact that in many cases genetic material has only negligible value (mostly and mainly derived from its contribution to the general ecosystem services) until it is discovered by a commercial enterprise which develops a successful product. The study summarizes the concern as follows:

68. “However, these studies are for genetic material, which has already been discovered and mostly undervalued due to market imperfections. If we want to know whether the conservation of a species is worthwhile, we need to know the value of **undiscovered genetic material**. Several approaches have been used for this.” (Gundimeda et al. 2006. *The value of biodiversity in India’s forests*. Monograph 4: Green Accounting for Indian States and Union Territories Project; TERI Press, New Delhi, India)

69. Against this background – the problems involved in assessing the economic value of biodiversity and the excellent work done in India – we wonder why the proposal still includes such a strong component even trying to break down biodiversity valuation to the local level (Biodiversity Management Committees). The proponents should be requested to clearly elaborate and justify the added value of Component 1 of the project or to remove the component from the proposal if no sound justification can be provided.

70. **On Component 4:** Much of what is listed here seem to be activities which either have been done or should be done by the GoI whether the project is approved or not – e.g. “Establishment of national network of research institutions working on conservation, sustainable use and IPRs”. We feel that the proposal requires here a clear focus on ABS related issues to avoid duplication of existing efforts of the GoI. Furthermore, inter-ministerial coordination is a major challenge in any country. We wonder how the project intends to address this challenge.

71. **Coordination with other related initiatives:** The proposal rightly mentions the opportunities for collaboration with the other organizations, however, mechanisms for realizing these opportunities are not elaborated. We also recommend to directly involving ICIMOD in the implementation of the project in the Hindukush-Himalayas. Thus the project could directly draw

on the extensive BMZ/GTZ supported work and experience of this regional institution with ABS capacity building activities in the North-Eastern States of India at the State and local level.

72. Overall, we fully agree with the generally positive assessment of the proposal by the STAP review and we share the concerns of the STAP review.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

14. Indonesia : Promoting Sustainable Production Forest Management to Secure Globally Important Biodiversity [World Bank]

COMMENTS FROM AUSTRALIA

73. The proposal is sound and appears to fit well with Indonesian priorities and other activities in the country. The level of private sector funding sought seems ambitious and it would be good to get a sense of the feasibility of this and the likely risks if this amount of private sector co-financing is not secured.

COMMENTS FROM GERMANY

74. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

75. The project aims at promoting the protection of forest ecosystem biodiversity in Indonesia through economic alternatives to logging business. The project will work on the restoration of forest ecosystems in the concessions, non-timber forest products and the promotion of the environmental services provided by these ecosystems.

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

15. Mexico : Integrating Trade-offs between Supply of Ecosystem Services and Land use Options into Poverty Alleviation Efforts and Development Planning [UNEP]

COMMENTS FROM GERMANY

76. (Project)... can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

16. Morocco : MENARID - A Circular Economy Approach to Agro-Biodiversity Conservation in the Souss Massa Draa region of Morocco [IFAD]

COMMENTS FROM GERMANY

77. The project fits well with overall policy on climate change adaptation and resources management. In case the project is to work in the Draâ valley, good cooperation should be established with the research programs IMPETUS and BIOTA as well as with the PRONALCD carried out with GTZ support.

78. The project is attached to the Ministry of Environment, but a strong relationship should as well be established with the High Commissioner on Forests and Desertification control.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

79. The project aims at the protection of south Morocco ecosystems biodiversity through the promotion of “produits de terroirs” for an economical valorisation in the protected area of Souss Massa Draa.

80. The objectives of this project, in particular, the promotion of “produits de terroirs” proposed by the project, are very close to the objectives promoted by the project “Protection and valorisation of South Moroccan Oasis” supported by the “Ministère de l’Aménagement du Territoire”, UNDP and FFEM. *These initiatives should have to work closely in order to propose and to implement common strategies of valorisation and marketing.*

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**17. Pakistan : Mountains and Markets: Biodiversity and Business in Northern Pakistan
[UNDP]**

COMMENTS FROM GERMANY

81. Germany asks for further clarifications with regard to this proposal.

82. As far as we understand, the project is going to focus on three or four specific biodiversity products derived from mountain areas in Pakistan: *Lycium barborum*, *Pinus gerardiana*, morel mushrooms and a group of non-specified MAPs. The proposal regards “insufficient market demand for products from Community Biodiversity Enterprises” as a risk which may threaten the project success and the project foresees to this end detailed feasibility studies and market analyses as well as the provision of extensive marketing support. While these market risks are known to exist, it is difficult to understand why the proponent has not carried out feasibility and market studies before submitting the proposal.

83. *Lycium barbarum*, for example, is a widespread species and is regarded in parts of its distribution area (e.g. in Central Europe) as invasive. It is particularly abundant in China. So it is hard to believe that it is a really high-value product which can sell well. *Pinus gerardiana*, on the other hand, is widespread but populations are almost everywhere small and in low density. Plantations have been established in Afghanistan. It is thus not clear whether the populations in the northern Pakistan target areas (which apparently cover an area of 10,000 km²), do provide a sufficient resource base for a relevant number of Community Biodiversity Enterprises (over 40 such enterprises are going to be founded under this project).

84. The project plans to stimulate the demand for “green products” and “organically produced superfoods”, and foresees to this end the introduction of a certification system. We doubt whether the non-existing certification of bioproducts from northern Pakistan is actually a bottleneck in marketing: *Pinus gerardiana* is, for example, regarded as a species growing under perfectly natural conditions, far from human influences, and any certification system will probably not lead to a comparative advantage in the marketing of its edible seeds.

85. The project will work with Community Biodiversity Enterprises, which are at present apparently not yet existent but still have to be established by the project. This may be a long process, and it should carefully be examined whether these enterprises will actually become fully functional in the life span of the project. Was the alternative to rely on private companies through public-private partnerships instead of establishing new enterprises not considered? This could under certain circumstances be a more cost-effective and probably more sustainable option.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

18. Panama : Mainstreaming biodiversity conservation through low-impact ecotourism in the SINAP [IADB]

COMMENTS FROM GERMANY

86. Germany supports the project proposal but would like to see that the comments provided by the STAP are taken into account in the further development of the project proposal.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**19. Papua New Guinea : PAS Forest Conservation and Protected Area Management
[UNDP]**

COMMENTS FROM GERMANY

87. (Project)... can be supported without a need for further comments.

20. Philippines : CTI Partnerships for Biodiversity Conservation: Mainstreaming in Local Agricultural Landscapes [UNDP]

COMMENTS FROM GERMANY

88. In general, projects on biodiversity conservation in the Philippines should be promoted due to the unique marine and terrestrial characteristics of the country. However, the proposed “Partnerships for Biodiversity Conservation: Mainstreaming in local agricultural landscapes project” can be seen as overambitious both from the side of institutional-set up and outputs to be achieved.

89. The institutional component does not pay tribute to the difficult tasks to coordinate and reach consensus in the proposed multi-stakeholder setting, e.g., coordination between the agriculture and natural resources management and trade related line agencies. Coordination becomes even more complex if Local Government Units (LGUs) are involved, as existing national laws provide conflicting mandates and responsibilities.

90. Next to coordination and legal issues, the expected outputs/achievements e.g. covering general conservation issues, biodiversity-friendly agriculture, trade and business promotion, land use planning, fiscal and investment reforms are over-ambitions and unrealistic. They also clearly exceed the mandates, capacity and capability of the executing partners and involve long lasting change processes plus political decisions/backup which is at present not entirely guaranteed.

91. The project should thus be scaled down to realistic targets, and, dependent on this, should have a responsible executing agency, e.g. DENR. An involvement and funding of NGOs and LGUs should be envisaged, however, based on a more precise location of the key ecosystems and landscapes to be targeted. The decision criteria should also include current and past donor support, political frame conditions and experience records.

92. We support the general objective of this PIF but **major revisions** as pointed out above are necessary for developing it into a full project proposal.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**21. Tanzania : Strengthening the Protected Area Network in Southern Tanzania:
Improving the Effectiveness of National Parks in Addressing Threats to Biodiversity
[UNDP]**

COMMENTS FROM GERMANY

93. The project depends heavily on wildlife tourism as major financial source of the national park system and other protected areas. It is questionable whether the Southern Tanzanian protected areas can render additional income or will rather reduce the tourism income in the Northern wildlife tourism area by setting up competing attractions.

94. The project proposal is of utmost importance and has a high potential to sustain Tanzania's biodiversity. The project objective and the planned activities are well formulated and clear. The risk analysis (Part G) and following recommendation should be taken into account during further elaboration of the project document. We fully support the development of the PIF into a full project proposal.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

22. Venezuela : Strengthening the Marine and Coastal Protected Areas System [UNDP]

COMMENTS FROM GERMANY

95. The high inflation rate of the Venezuelan Bolívar can be a problem for the financial calculation. It is not clear how this was considered in the present calculation.
96. The complete financial dependency on PDVSA, as nearly the only co-financing institution, is very critical: On the one hand due to its dependency on the prices of the global oil market, on the other hand because PDVSA has an enormous financial background so that financial support of other organisations – as mentioned in the project outline – might be insignificant or not forthcoming.
97. During the development of the project document emphasis should be put on the co-management an agreement, taking into account that participation of local stakeholders, communities and civil society is an essential part to achieve sustainable solutions.
98. The national park institute INPARQUES, which up to the moment is not mentioned in the project outline should be incorporated into the project development and implementation.
99. It is highly recommended to involve institutions with the technical know-how in the area of marine and coastal conservation, e.g. the universities UCV-Caracas, UDO-Maturín, USB-Caracas and LUZ-Maracaibo, the IVIC-Caracas and Fundación La Salle in Caracas and Isla Margarita.
100. It needs clarification, if the project is really consistent with national priorities and plans, e.g. the actual government does not focus on “decentralized development of the territory”, as mentioned in the PIF document.
101. The Project Identification Form exceeds with the amount of 8 pages the generally recommended 4 pages for Project Identification Forms considerably.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

CLIMATE CHANGE

23. Regional (Burundi, Kenya, Rwanda, Tanzania, Uganda) : Promoting Energy Efficiency in Buildings in Eastern Africa [UNEP]

COMMENTS FROM GERMANY

102. Comments from Germany:

- Arguments in favor of EE in buildings are all compelling and relevant.
- Surprising that no baseline study was done prior to project proposal. How do we know what the scope of energy inefficiency is in the existing buildings in order to know the response needs? Would be good to know what the energy demands are in buildings in each of the 5 countries. If only 5% of Rwandans and 2% of Burundians have access to electricity, then what is the expected impact of EE measures?
- Development of environmentally sound human settlements is not a decision-maker priority, as stated in the proposal, and it is not clear how this hurdle will be overcome. How will the EE policies get past decision-makers who are concerned with quantity vs. quality?
- Success of project hangs on the formulation and enforcement of necessary policies and by-laws, and proposal is to lobby bureaucrats to achieve this goal. What sorts of assurances are there from the five countries that a favourable outcome can be achieved?

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

103. The project aims at promoting energy efficiency measures in the buildings sector in 5 countries.
104. The project is supported by N-Habitat. 100,000 units are built every year in the region. The region has one of the highest annual rate of urbanization in the world (4%).
105. More appropriate design and performing construction, efficient cooling/heating, ventilation and lighting systems are needed.

106. The project will seeks to mainstream EE into the existing legislation and to build on ongoing initiatives and develop an EE regulatory system for new buildings.

Opinion: Favourable.

WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (REFERENCE TO GEF C.35/7)
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24. Algeria : Integrated Approach for Zero Emission Project Development in the New Town of Boughzoul [UNEP]

COMMENTS FROM GERMANY

107. Groundbreaking project with a very large mandate and scope as well as a demanding plan for coordinating seven different program components. UNEP should ensure that the necessary policy frameworks and incentives to promote renewable energy and efficiency measures are in place from the outset of the project.

COMMENTS FROM SWITZERLAND

Overall Comments

108. The project document is well written and well conceived. The project justification is well addressed and gives all the necessary information. The introduction provides useful information on the economic and demographic growth that is taking place in Algeria as well as valuable information on the natural assets of Algeria that can be turned into renewable energies. The government of Algeria has acknowledged the necessity to promote renewable energies (RE) and energy efficiency (EE) and all stakeholders seem ready to collaborate in this adventure. All seven components are well described and there is no major concern about the concept as such.

Questions, Concerns and Challenges for the further Project Preparation

109. According to the document, introducing renewable energy (RE) and energy efficiency (EE) should lead to two major outcomes: (i) reducing the domestic dependence on natural gas, thereby assuring energy resources for strategic application; and (ii) creating new job opportunities for clean technology transfer for sustainable development. (According to the news agencies, the project Phase I has been awarded to an international company for \$650 Million.)

110. These two outcomes are pertinent but we have one reservation as regard outcome (ii) job creation: since it seems that more than 7,000 workers are to be directly imported from Philippines thus entering into direct competition with local workers. Besides the social and economical aspects, there is of course an environmental impact of such transfer of workers that should not be underestimated.

111. If one wants to arrive at or be near zero emission in the new town of Boughzoul through an integrated approach, special care has to be given during the planning phase of the project. Indeed, experience shows that the preparation phase is crucial since it gives the opportunity to all

stakeholders in the project to share their views and recommendations ensuring optimization of the project in terms of energy efficiency etc. Thus, the main challenge lies in GEF's ability to ensure a successful implementation of the component 2 Energy Efficiency in buildings while taking into account that phase 1 of the project has already been signed and approved by the Government of Algeria. In that regard, we are a little concerned about the information picked up on the website (...) that approximately 7,000 workers will be “imported” from the Philippines. Besides the social and economic considerations, one can wonder if this decision is environmental-friendly.

- Component 1: Clean energy policy framework
The policy framework is a major added value to the project. It will ensure coordination among the different government institutions and agencies involved in RE and EE activities. It will also aim at strengthening legislative and financial support and serve as a baseline for new projects of this kind. It is crucial that all stakeholders approve the framework before the detailed planning and construction of the town actually begins.
- Component 2: Energy efficiency in buildings
On the basis of the information gathered, the contract for the first phase has already been signed with an international company based in South Korea. Thus, it seems difficult to develop a “mandatory EE code in new buildings as well as standards and labels for different types of appliances” in the course of the project. Experience has shown that such codes should be defined and approved before the beginning of the project. It is crucial that such codes be fully integrated in the building standards of the town of Boughzoul before the mass planning has actually been completed.
- Component 3: Development of adapted urban management plans
Developing context specific urban strategies that integrate the environmental constraints is wise. The timeframe is adequate and should ensure a successful implementation of the strategies to be developed.
- Component 4: Development of RE master plans
The attention paid to the development of RE master plans is appreciated and in line with Algeria's natural assets which can be turned into renewable energies. Solar and, to a lesser extent, wind energy have a strong and long-term potential in Algeria. It is important to set up a green energy programme that includes all sectors of the modern societies.
- Component 5: Promotion of EE and RE pilot projects
Using the RE master plans and experience gained in Boughzoul is a good initiative.
- Component 6: Capacity strengthening for technology transfer
No comment
- Component 7: Capacity strengthening for technology transfer
No comment

Conclusions and Recommendations

112. The project should be supported, but one should make sure that the impact of the projects on objectives and strategies comes early enough in the design process. As per information available, it is likely that this has been missed in phase I.

113. The questions, concerns and challenges noted above should be taken into consideration while designing the terms of reference for town planning and design.

Additional Comments

114. The objectives of the GEF component are important and the concept is overall well designed. However, as per information available, implementation of the overall project seems already to be ongoing. Therefore there are doubts about the role to be played by and the efficiency of GEF involvement at this stage of implementation. Environmental objectives should be integrated into project design as early as possible, otherwise the potential to influence project design is lessened and the cost-effectiveness of the environmental investments is reduced.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

115. The new town of Boughzoul (200 km south of Algiers) will have 400,000 inhabitants. The project is facing sustainable development challenges with regard to the scarcity of natural resources.

116. The GoA has committed 1 Bn\$ for this 15 year project. The GoA would like to build an innovative urban management master plan model integrating a zero emission approach. This approach implies a clean energy framework, the development of energy efficiency buildings, drawings of master plans for transport, waste and public lightening.

117. The GoA is seeking technical assistance from UNEP/DTIE.

118. **Opinion:** The ambitious project is an opportunity for working on the conception of new cities with the use of new concepts.

- *It requires strong experience and leadership to lead such a project.*
- *Are the Development Agency of Boughzoul and UNEP/DTIE endowed with such capacities?*

If yes, Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**25. Argentina : Third National Communication to the United Nations Framework
Convention on Climate Change [World Bank]**

COMMENTS FROM GERMANY

119. (Project)... can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

26. Armenia : LGGE Improving Energy Efficiency in Buildings [UNDP]

COMMENTS FROM GERMANY

120. (Project)... can be supported without a need for further comments.

27. Cambodia : Reducing Greenhouse Gas Emissions through Improved Energy Efficiency in the Industrial Sector [UNIDO]

COMMENTS FROM GERMANY

121. Comments from Germany:

- According to the World Resources Institute, as of 2005 Cambodia had 0 GHG emissions from the industrial sector, however in the proposal as of 2007, 20% of the country's emissions are from industry. Would be useful to know the source of emissions data used for the proposal.
- UNIDO's experience in implementing this type of project should be more adequately explained.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

122. The project targets energy efficiency in the industrial sector in Cambodia. Cambodia industry is characterized by captive power generation (on site power production) from fuel, coal or wood.

123. The four most energy intensive industrial sectors are the brick-making industry, rubber refining, rice milling and garments.

124. The project will be based on energy efficiency pilot projects in those 4 sectors complemented by transversal capacity building and institutional strengthening activities. This two-pronged approach is legitimate.

125. *The dissemination of the results relies nevertheless on several hypotheses that are questionable or to be detailed:*

- It is clear that the high price of energy in Cambodia today is an incentive to develop energy efficiency projects. Nevertheless, the discovery of oil in the country and the development of several hydro power schemes might change this favourable context. *The feasibility of the project should look into the possible evolution of the energy price in Cambodia and the possible impact on the project.*
- The development of a local production of energy efficient equipments to lower the price of those equipments should be looked into carefully. The development

of such a production can be capital intensive while better deal might be reach with regional providers as long as a minimum market for such equipment is developing in Cambodia.

Opinion: Favourable with a need to detail some hypothesis.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

28. Chad : SPWA-CC Promoting renewable energy based mini-grids for rural electrification and productive uses [UNIDO]

COMMENTS FROM GERMANY

126. Major clarifications and revisions are needed when developing this PIF into full project document.

- One of the principal arguments for the project is poverty reduction, which goes beyond GEF's mandate. It has to be made sure that GEF resources will only finance activities that are in line with its mandate.
- (Component 3) Financial support, institutional capacity and legal framework: Proposal does not address the problem of political instability as potential barrier to promoting private-sector investment in renewable energy sector.
- Creating a market environment: What is meant by "strong private sector interest" and private- sector involvement in mini-grid financing? \$1.3 million in co-financing from the private sector is expected, but the type of financing is unknown. Can specific financiers be named? Local banks? Chadian private sector? Are local banks in a position to appraise and finance RE projects? This needs to be clarified and specified before Council approval of the final project document.
- While RE resources may be abundant and the need for energy access urgent, success will hang largely on the ability to mobilize investments from the private sector. What indications are there that a return on investment can be achieved? No mention of pre-feasibility studies in the proposal.
- UNIDO's experience with this type of project should be elaborated upon.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

127. The project aims at developing the use of renewable and biomass for mini- electricity grids on a 2 sites (2*1MW) and strengthening the legal and regulatory framework related to them.

128. The project is part of the "GEF Programmatic Approach on Access to Energy in West Africa".

129. Opinion: No detail is given regarding the sites, the technology, the potential partners and investors.

130. *However, the GoT is committed to grant 800 000 \$ and Multilateral agencies 1,9 M\$ although the project seems to be at an early stage.*

Opinion: Favourable, subject to precisions on these commitments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**29. Colombia : Energy Efficiency Standards and Labels in Colombia (S&L Colombia)
[UNDP]**

COMMENTS FROM GERMANY

131. In 2001, Colombian government launched a standards and labeling program and developed 30 EE and labeling procedures for variety of appliances, but manufacturers are not using labels due to voluntary nature of the program. What sorts of assurances exist that prior to project approval the Ministry of Mines and Energy (MME) will pass the ministerial regulation required to make standards and labels usage mandatory? At present it is only being considered by the ministry.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

30. Egypt : Improving the Energy Efficiency of Lighting and Building Appliances [UNDP]

COMMENTS FROM GERMANY

132. Comments from Germany:

- Good use of innovative financing mechanism to overcome the higher cost of CFLs: poorer households can pay off the cost of CFLs in installments through their regular electricity bills.
- GTZ is working in Egypt to design the framework for an Energy Efficiency Agency with which project developers may collaborate.
- Project plan lacks a recycling or disposal plan for CFLs, which due to mercury content, are considered toxic.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

133. The project is a follow-up of an earlier GEF-funded Energy Efficiency Improvement and Greenhouse Gas Reduction.

134. The new project is focused on efficient lighting and appliance standards and labels. The objective is to facilitate the market transformation in accordance with the political signal sent by President Mubarak in 2007 (“save 20% by 2020”).

135. The sales of CFL are to be boosted from 4 million units in 2007 to 15 million by 2015. The project will:

- (a) support this large scale energy efficient initiative;
- (b) strengthen the implementation, regular updating and enforcement of the standards and labels for appliances; and
- (c) develop feedback mechanism for adaptive management and monitoring.

136. The energy context in Egypt is more in favour of energy efficient measures and actions.

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

31. Gambia : SPWA-CC Promoting Renewable Energy Based Mini Grids for Productive Uses in Rural Areas in The Gambia [UNIDO]

COMMENTS FROM GERMANY

137. Comments from Germany:

- Long-term viability of project depends on the energy provided being used for productive purposes (income generation). More info is needed on the links between grids and productive uses. Adding value in the agriculture sector is mentioned as one productive use for the new electricity grids. Are there actual development plans linked with agriculture production in the areas identified for grid installations? Are there specific agriculture products that are being targeted?
- Will non-productive uses of the electricity generated also be permitted? (for homes?)
- What assurances are there that private sector will invest in mini-grids? Since the concept of installing mini-grids for rural electrification is new to Gambia, shouldn't funding for Components 2 and 5 be contingent upon a successful outcome of Component 1 (demonstration projects)?
- UNIDO's experience with this type of project should be elaborated upon.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

138. The project aims at developing the use of renewable and biomass for mini- electricity grids on 3 sites and strengthening the legal and regulatory framework related to them. There are six minigrids working actually. All of them are fossil fuel based. Gasification of biomass is considered.

139. The project is part of the "GEF Programmatic Approach on Access to Energy in West Africa".

140. Opinion: No detail is given regarding the sites, the technology used, the potential investors. The contribution of the GoG is unknown at this stage. *A more indepth insight seems necessary to design adequately the technical assistance.*

Opinion: Favourable if these information can be provided.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

32. Ghana : SPWA-CC Promoting of Appliance Energy Efficiency and Transformation of the Refrigerating Appliances Market in Ghana. (under West Africa Energy Pprogram:3789) [UNDP]

COMMENTS FROM GERMANY

141. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

142. The project aims at improving the energy efficiency of the refrigeration appliances used in Ghana (2 millions). The project amongst others will draft regulations, design labels, establish test facility and CFC collector and incinerator.

143. Opinion: The project should cover not only refrigeration but air conditioning as well. The EE issue has to be linked with ODS eradication. *Therefore, a link with MLF has to be established in particular with the AFROC Project (UNIDO) supported by FFEM, GTZ and JICA.*

Opinion: Favourable.

33. Kazakhstan : Energy Efficient Design and Construction in Residential Sector [UNDP]

COMMENTS FROM GERMANY

144. Clarification is needed regarding the contribution of the project to improved construction materials. The Kazak government has set a priority of producing 70% of its building materials domestically, and glass, bricks and cement are named as three of the prioritized industries to support. Since these are also three of the most energy intensive industries in the world, shouldn't the project also include a component on efficiency measures specifically targeting these industries? Does the planned work with provincial governments to increase domestic production of high energy performance construction materials include these 3 energy-intensive industries? Would labeling scheme for construction products include these industries?

COMMENTS FROM SWITZERLAND

Overall Comments

145. Kazakhstan has huge natural resources of metals, minerals and fossil fuels, and is one of the most carbon intensive economies world-wide. Due to a strong growth in the construction sector with 20% additional heated space annually, energy consumption in the residential sector is strongly increasing. The existing buildings and the building technology today exhibit a poor quality standard with respect to energy efficiency. Building components such as windows, insulation, and heating equipment are also of a poor technical standard and industry in the country does not have the know-how of present-day technologies. Also for imported components, quality is not safely guaranteed. Furthermore, the technical knowledge of engineers and architects does not reflect the standard in building technology available in Western Europe. Finally, today's tariff system for heating costs does not create sufficient incentives for consumers to invest in energy efficiency. Consequently, CO₂ emissions will steeply increase due to the growth in the residential sector in the next decades. The target of the project is to implement new building technologies to break this trend and to reduce the energy consumption for newly erected buildings. For this purpose, four activities are planned, i.e.: (1) improve the enforcement of energy efficiency standards, (2) expansion of markets for energy efficient products, (3) raising the awareness for integrated building design, and (4) demonstration of integrated building design with two pilot residential buildings.

Questions, Concerns and Challenges for further Project Preparation

146. Both know-how and components for low-energy buildings are basically available in Western Europe. Hence the target of know-how transfer seems realistic and can be highly

efficient, as it can enable a multiple effect when introduced in the current stage of a strongly increasing residential sector.

147. On the other hand, political boundary conditions might question the success of the project, as it is described in the section F as a risk. It is essential to change tariff systems in a way that cross-subsidies are safely eliminated and consumption-based billing of energy consumption is introduced. Hence measures to reach this target are essential and need to be strengthened in further project preparation.

148. In addition, the project focuses on energy efficient building, which is a high priority issue in the residential sector. However, energy production should be integrated in the project plan. A second priority target is to replace fossil fuels by renewable energies where applicable. Here, for example, automatic wood combustion plants should be evaluated to replace fossil fuels in district heating nets, small-scale wood heating appliances should be considered in medium-scale building (obviously with wood supply coming from sustainable production), and decentralized solar energy for warm water might be considered. With respect to heating technology with both fossil fuels and biomass, know-how transfer of technologies enabling higher efficiencies in the conversion of fuels to collectible energy might also be considered, as this offers an additional and relevant potential of CO₂ savings.

Conclusions and Recommendations

149. The implementation of energy efficient buildings in the residential sector in Kazakhstan has a huge potential for GHG savings at low CO₂ cost. The project proposal focuses on four activities to introduce energy efficiency in new buildings which complement each other and promise a relevant impact. The project can be supported and has potential to be complemented with measures to replace fossil fuels by renewable energies. In addition, it might act as a catalyst to start-up initiatives for energy saving in existing buildings in future.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

34. Liberia : SPWA-CC Installation of multi-purpose mini-hydro infrastructure (for energy & irrigation) [UNIDO]

COMMENTS FROM GERMANY

150. Comments from Germany:

- Project is promoted within GEF Strategic Area: Promoting Market approaches for Renewable Energy, however market approach is unclear. What sorts of productive uses are envisioned to raise the return on investment in mini-hydropower plants? Clarity on the long-term sustainability of project is required due to heavy dependence on donor financing.
- Climate risks high: will hydrological studies be conducted and climate information gathered and analyzed prior to project implementation to ensure project viability?
- UNIDO: clarification is required with regard to how this project has a “strong industrial” focus, thereby giving UNIDO a comparative advantage.

COMMENTS FROM SWITZERLAND

Overall Comments

151. The PIF provides a good description of existing barriers and concludes that there is a lack of national capacity for exploring mini-hydro resources. At the same time it is suggested that the project will:

- establish a hydropower site in an off-grid isolated community;
- use the process for learning by doing;
- build local capacity;
- review existing regulatory framework;
- recommend financial mechanisms promoting private sector involvement;
- lay the foundation for a market environment for mini-hydro;
- have a significant demonstration effect;
- contribute to scaling up and replication;
- conduct a baseline study of the region, for future monitoring and review;
- develop a tariff and management model;
- address repair and maintenance issues;

- promote productive end-use and income-generating activities;
- reduce the country's dependency on fossil fuels;
- avoid considerable amounts of GHG emissions;
- strengthen local manufacturing; and
- assist in market linkages and networking.

152. All these features are relevant and probably feasible in a well-defined, properly managed 100 Mio. USD program and with a time horizon of 10 years – but definitely not in the framework of a 5.7 Mio. USD project with a project period of 48 months.

153. It is suggested splitting the project into 3 phases and addressing the identified issues step by step.

Questions, Concerns and Challenges for the further Project Preparation

154. It is suggested that the risks that might prevent the project objective are reviewed.

- **Risk 1:** Insufficient flow during dry season. This risk has a great influence on the financial viability of the scheme provided the generated electricity could be sold. The proposed mitigation measure (“the use of storage trough reservoir dams and deliberate introduction of flow regulation in project design and construction”) is highly unprofessional. An appropriate measure would be to select a site where the hydrological parameters are sound and compatible with the energy demand of the local population.
- **Risk 2:** It is unclear to what extent hydro-power could be a substitute for thermal or diesel power stations and it should be kept in mind that presently the vast majority of people in Liberia is not served with electricity. It is most likely that more thermal and hydro is required.
- **Risk 3:** This risk can be mitigated by simplifying the project and reducing the number of goals to be achieved.
- **Risk 4:** Banking on subsidies will undermine the sustainability of the project. The best mitigation strategy is to involve experienced experts understanding low-cost approaches.
- **Risk 5:** Envisage afforestation programs in the catchment areas of the mini hydro schemes.

Conclusions and Recommendations

155. Basically we support the project objective and recommend the approval of the project. However we feel that the goals are too ambitious, and therefore recommend splitting the project into 3 phases: (1) preparation of work plan, baseline survey, (2) site selection, feasibility study, detail design, and (3) implementation, capacity building. Furthermore we expect that in further planning special attention is given to minimize the risks, as discussed above.

**35. Malaysia : CF Industrial Energy Efficiency for Malaysian Manufacturing Sector
(IEEMMS) [UNIDO]**

COMMENTS FROM GERMANY

156. Comments from Germany:

- Need for EE measures is clear but scope of project is described in very broad terms. If SMEs in manufacturing sector are the focus of the project, and manufacturing SMEs comprise 96% of all manufacturing sector (37,866 SMEs), where is the starting point and what specific EE measures will be undertaken? Project plans to demonstrate “energy savings in industry through application of systems optimization”, however no details are provided.
- **Energy Unit Index:** this term needs to be explained. Numbers provided for cement and steel sectors are incorrect, resulting in a misleading presentation of gigajoules per ton of product produced. As this affects priority setting, the clarification needs to be made.
- Is UNIDO the appropriate agency to execute?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

36. Nigeria : SPWA-CC Mini-grids based on Renewable Energy (small-hydro and biomass) Sources to Augment Rural Electrification [UNIDO]

COMMENTS FROM GERMANY

157. Comments from Germany:

- Project proposal is similar to proposal for Gambia and comments are also similar: What assurances are there that the private sector will invest in mini-grids? What productive uses of the mini-grids are planned to incentivize private sector investment?
- Would it be possible to take a 2 phase approach to funding this project: first test the mini-grid approach with pilots, and second proceed with dissemination measures based on a successful pilot phase?
- UNIDO's experience with this type of project should be elaborated upon.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

158. The project aims at developing the use of hydro and biomass for mini- electricity grids (0,5 to 2 MW).

159. The potential of investment is important with respectively 2000 MW and 600 MW according to the Renewable energy master plan (2015-2020) established in 2005.

160. The project aims at realizing this potential by supporting demonstration project (at least 3 MW) and assistance to conducive financing, policy and institutional environment.

161. The project is part of the "GEF Programmatic Approach on Access to Energy in West Africa".

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

37. Nigeria : SPWA-CC Promoting Energy Efficiency in Residential and Public Sector in Nigeria [UNDP]

COMMENTS FROM GERMANY

162. Project plan lacks a recycling or disposal plan for CFLs, which due to mercury content, are considered toxic.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

163. The project aims at improving the energy efficiency of a series of electrical equipment commonly used by the residential and public sector (refrigeration appliances, air conditioners, lighting, fans, motors). The improvement is sought through the development of standards and labels and demand side management programs. The project is part of the regional ECOWAS project supported by the GEF/UNIDO (Standards and labels). It will be implemented in partnership with the GoCuba which was one of the first countries to have replaced at national scale incandescent lamps by CFL.

164. Opinion: Nigeria is the most populated country in Africa. In spite of abundant energy resources, the country is facing shortage and unequal distribution.

165. *Definition of S&L is most desirable but the conditions of control and implementation are to be improved in parallel.*

166. The project needs to be supported.

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

38. Peru : Energy Efficiency Standards and Labels in Peru [UNDP]

COMMENTS FROM GERMANY

167. (Project)... can be supported without a need for further comments.

39. Sierra Leone : SPWA-CC Promoting Mini Grids Based on Small Hydropower for Productive Uses in Sierra Leone [UNIDO]

COMMENTS FROM GERMANY

168. Comments from Germany:

- The project falls under GEF Strategic Area: Promoting Market Approaches for Renewable Energy. However, the project description tends more towards poverty reduction measures in rural areas. **It needs to be clearly specified before Council approval of the final project document which activities the GEF will pay for and these activities have the clear objective of generating global environmental benefits.**
- Stated barrier to success includes: doubts about the assured financial returns and security of the investments. What assurances are there that the private sector will invest in mini-grids? (Currently no private sector contribution is foreseen in project financing and project is reliant on bi- and multi-lateral financing.) What productive uses of the mini-grids are planned to incentivize private sector investment?
- Would it be possible to take a 2-phase approach to funding this project: first test the mini-grid approach with pilots, and second proceed with dissemination measures based on a successful pilot phase?
- What assurances are there that the government will enact the needed policies to promote renewable energies in rural areas, thereby facilitating a successful implementation of the project?
- What is the industrial focus of this project that gives UNIDO the comparative advantage?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

40. South Africa : Market Transformation through Energy Efficiency Standards and Labeling of Appliances in South Africa [UNDP]

COMMENTS FROM GERMANY

169. Revision of the tax system is mentioned but should be elaborated upon to identify potential incentives and financing mechanisms. Could, for example, tax rebates be provided for investments in EE appliances? On the supply side: would it also be possible to levy taxes on the relatively cheap supply of energy (coal) to incentivize investment in efficient appliances?

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

170. The project aims at promoting energy efficiency standards and labeling of appliances in South Africa. To do so, the proposal is to work on the policy and regulatory framework, to build the capacities of the relevant stakeholders and to adopt minimum energy standards.

171. These preliminary steps would pave the way to a broader shift of South African market towards more energy efficient appliances, while this shift is today still difficult due to the low price of South African electricity and the obstacle represented both for household and providers by the higher prices of the energy efficient appliances.

172. The project appears necessary and welcomed in the current situation of energy crisis in South Africa *but we can regret that it does not consider any further step than the Minimum Energy Standard Adopted. It should leave the door open to more ambitious move, should the South African government intensify its efforts to promote energy efficient appliances nationally.*

Opinion: Favourable.

41. Ukraine : Improving Energy Efficiency and Promoting Renewable Energy in the Agro-Food and other Small and Medium Enterprises (SMEs) in Ukraine [UNIDO]

COMMENTS FROM GERMANY

173. Comments from Germany:

- Scaling up of EE measures and fuel-switching are provided as the approach for agro-food industry. Are there any specific technologies or RE sources beyond biomass gasification that can be named?
- Can more specific information be provided about the types of agro-industries that will be targeted?
- Buy-in from government and private sector in terms of co-financing is commendable.
- Government adoption of the necessary regulatory frameworks to support the project is categorized as “high risk”. Would it be possible to gain greater assurance that the needed frameworks will be put in place prior to project implementation?

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

42. Vietnam : Vietnam Clean Production and Energy Efficiency Project [World Bank]

COMMENTS FROM GERMANY

174. Comments from Germany:

- *This project has a budget of over \$100 million, of which GEF financing is about 2%. Please explain where co-financing is supposed to come from.*
- Given the large scope of the project, there are not a lot of details provided with regard to how energy efficiency will be achieved. Each of the three components proposed is a project in and of itself. Which industries will be targeted? Which technologies will be required? What measures will be taken to create an energy efficiency investment market in component 2? How will the market for energy efficient appliances be achieved? The answers to these questions should be clear to project developers prior to the approval of the final project document.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

175. This project is part of a long term partnership of the WB with the GoV since 1997 (EVN, MoST, MoC, MoIT) in the field of energy efficiency and falls in the context of willingness of the WB to support the expansion of opportunities in this filed.

176. The project targets:

- (a) the new industries which should opt for efficient technology,
- (b) the development of third party energy service providers (ESCOs) and
- (c) the promotion of efficient household electrical appliances.

177. The project is in line with the WB strategy and complements other ongoing initiatives with UNDP (Promoting Energy Conservation in SME) or UNIDO (Promotion of Energy standards).

178. *A global capitalization of the all lessons learnt from these various initiatives should be planned and integrated in the project.*

Opinion: Favourable.

INTERNATIONAL WATERS

43. Global (Albania, Bosnia-Herzegovina, Bulgaria, Algeria, Egypt, Croatia, Lebanon, Libya, Morocco, Montenegro, Macedonia, Syria, Tunisia, Turkey, Serbia) : MED Sustainable MED Governance and Knowledge Generation [World Bank]

COMMENTS FROM GERMANY

179. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

180. The project aims at supporting the actions implemented by the riparian countries on the Mediterranean Sea within the framework of the Barcelona Convention in particular, the protocol on the Integrated Coastal Zone Management (ICZM) which has been approved recently. *That is the reason why the project is relevant and allowed to strengthen the initiatives supported by France to promote an Integrated Coastal Zone Management around Mediterranean Sea.*

Opinion: Favourable.

**44. Regional (Algeria, Egypt, Lebanon, Libya, Morocco, Mauritania, Tunisia) : MED
Regional Coordination on Natural Resources Management and Capacity Building (TA)
[World Bank]**

COMMENTS FROM GERMANY

181. Comments from Germany:

- Even in at this stage, we think it is important to specify the participating countries and we would like to see that all participating countries are mentioned in the document.
- In the final project design attention needs to be given to the formulation on appropriate performance based indicators to measure the impact of the interventions. Based on the outputs as they are formulated in the PIF we think it will be challenging to develop measurable indicators.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

182. The project aims at harmonizing the national approaches in hydrological data collection management in the riparian countries of Mediterranean Sea. This objective should allow at regional level a better understanding of telluric pollution risks and the regional sensibility to climatic variations.

183. *The studies actually working on by “Plan Bleu” as regards the management of the regional hydrological data and the impacts of the climate change on the water resources should be an interesting contribution to this project.*

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

45. Egypt : MED Enhanced Water Resources Management [World Bank]

COMMENTS FROM GERMANY

184. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

185. The project aims at improving fresh and ground water quality in the Nile delta in order to reduce the risks of pollution in the Mediterranean Sea and in the aquifers.

186. The focal point of the project relates to the treatment and the reuse of waste water.

187. Taking into account the threats in the Nile delta because of the hydrological modifications link to climatic changes, the objectives of this project are particularly relevant.

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**46. Syria : MED Coastal Rivers and Orontes River Basins Water Resources Management
Project [World Bank]**

COMMENTS FROM GERMANY

188. (Project)... can be supported without a need for further comments.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

47. Tunisia : MED Greater Tunis Treated Wastewater Discharge in the Mediterranean Sea. [World Bank]

COMMENTS FROM GERMANY

189. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

190. The project aims at developing waste water re-use in the gulf of Tunis in order to use them for agricultural irrigation and aquifers recharge.

191. The project should improve the coastal ecosystems statement in the gulf of Tunis.

192. This project is closely linked with the project “Gulf of Tunis”, funded by FFEM, aiming at assessing the gulf of Tunis ecosystems. *These Projects should have to discuss and compare their strategies and approaches in order to define and implement a concerted intervention.*

Opinion: Favourable.

LAND DEGRADATION

48. China : PRC-GEF Partnership- Capacity and Management Support for Combating Land Degradation in Dryland Ecosystems [ADB]

COMMENTS FROM AUSTRALIA

193. AusAID (the Australian Agency for International Development) has worked with the Qinghai Provincial Government (specifically, the Qinghai Forestry Bureau) for the last six years on projects related to forestry resources management. While in a different sector to dryland farming, which will be addressed in the GEF project, many of the principles appropriate to the project in this province will be the same.

194. AusAID's support to this sector in the Qinghai province now focuses on:

- (a) Establishing a Monitoring and Evaluation (M&E) methodology for effective monitoring of the impacts of the Forestry Ecological Programs using multiple criteria analysis tools. The purpose is to develop broader data sets that can be used in province-wide and national policy making, focusing specifically on how to expand and sustain the benefits of forestry programs.
- (b) Conducting studies to assess the capacity for carbon sequestration in forests, grasslands and wetlands in Qinghai Tibet Plateau and assess the potential ecological benefits and market value of carbon sequestration as a compensation mechanism.

195. Both these elements are similar to the activities proposed in the GEF project (monitoring and payment for environmental services) which will operate in the same province. AusAID would be very interested in collaborating with the ADB and our partners in the Qinghai Forestry Bureau during the implementation of the GEF project, so that AusAID can share the lessons learned from our work and learn from the GEF project.

COMMENTS FROM GERMANY

196. (Project)... can be supported without a need for further comments.

COMMENTS FROM SWITZERLAND

Overall Comments

197. The objective of improving the performance of GEF co-financed partnership in China is highly relevant. “The Project will serve as the core organizational and coordination framework for the PRC’s efforts to combat land degradation.” (**PIF/I.**) However, the project as the core framework for a huge effort to combat land degradation is too narrowly focused on the GEF programme and is not specific enough in the support of policy and management for combating land degradation. The project is intended to achieve outcomes in multiple dimensions (test approaches, pilot projects, deepening of understanding, legislative capabilities, institutional reforms, studies, CBAs, PES and compensation mechanisms, IEM, SLM, RBM, new SLM technologies, comprehensive LD monitoring and assessment, innovation for SLM, sustainable financing for SLM, scaling up). The project lacks clear orientation; the PIF shows little conceptual coherence in its structure and the wording is fuzzy. The issues at stake are complex, and the project must indeed deal with this complexity, but it should not try to do everything everywhere. There are positive experiences in supporting capacity development for dealing with land degradation by integrating approaches and experiences of and among many agencies, experts, and programmes in China (e.g. BEST PRACTICES for Land Degradation Control in Dryland Areas of China). This compilation of best practices developed by the China-GEF partnership and LADA according to WOCAT methodology is an example of how to develop instruments and processes for effective knowledge management and sharing.

Questions, concerns and challenges for further project preparation

198. One fundamental question is how to develop a coherent conceptual framework for integrating the multitude of existing approaches, methods, and tools. Further questions concern where and when learning processes, negotiations and decision-making will take place, as well as who is to do what, and who can do what best.

Conclusions and Recommendations

199. The project has to focus and specify its support in order to do an effective and efficient job of providing support and not to become an institution implementing programmes for a certain time and then leaving behind a big gap in China. The main focus should be on support and fostering of capacity development based on an overall concept of knowledge management that can frame and accommodate the various components.

200. A broadly shared concept and understanding of SLM and IEM in the context of China can offer the topical framework for proper monitoring and assessment of LD as well as approaches and technologies for SLM. Policy advice, legislative capabilities and institutional reforms have to relate to this shared overall concept of SLM and IEM.

201. Collaboration between major global programmes such as LADA and WOCAT will allow for integration of global knowledge and methodologies to foster innovation based on scientific

knowledge and local expertise and knowhow. The methodology of WOCAT (hosted and CDE, University of Bern) offers a promising potential to enhance the project.

WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (REFERENCE TO GEF C.35/7)
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MULTI-FOCAL AREAS

49. Global : Development Market Place 2009: Adaptation to Climate Change (DM 2009) [World Bank]

COMMENTS FROM GERMANY

202. **This project is an adaptation project.** There is no basis for financing it under the GEF Trust Fund as: (1) it does not provide for global environmental benefits; and (2) the Strategic Priority on Adaptation has finished. Projects on adaptation should only be financed under the SCCF and the LDCF. In spite of this, Germany doesn't want to stop this project as we believe that it is a good activity that needs to be brought forward. However, we consider this as an exceptional case and we would like to make it clear that we won't approve adaptation projects under the GEF Trust Fund anymore in the future.

203. With regard to the PIF we have the following comments and questions: To what extent is this approach an effective instrument for exchange about development approaches in the area of climate change? In what way does contribute to a community of practice? Lessons and experiences from the past rounds of "Development Market Place" (which started in 1998) should be evaluated to maximize learning and stimulate sustainable dialogue. This should also be reflected in the budget, giving greater attention to component four (possibly drawing on experiences not only of winning projects of this year, but also of past years).

COMMENTS FROM SWITZERLAND

Overall Comments

204. The aim to foster innovation for development and adaptation is relevant. The Development Market Place approach was conceived to foster technological innovation for development. CC in developing countries increase the challenges of vulnerability and resilience. These are related to technologies, but the critical dimensions are rather to be found in resource governance and in the institutional capacity to regulate resource management. In this nexus, the significance of technologies depends highly on the context, which is subject to high local, social and temporal differentiation (CC). Therefore, any global approach to fostering effective innovation for adaptation is quite limited. The importance of institutional innovation and capacity is underestimated in the project design under review.

Questions, concerns and challenges for further project preparation

205. Selection criteria focusing on measurable results and “financial sustainability” are problematic. The concept of “financial sustainability” seems confusing: does it refer to a sound financial ground for implementing the project (which should be included in the criterion of “realism”) or does it imply the attempt to assess, at this stage, the “economic” feasibility of the innovation in question, which in fact depends on the very institutional context that needs to adjust in order to achieve sustainable development?

206. High emissions from travel contribute to CC. The project’s approach to communication is not sufficiently adapted to the overall aim to reduce CC impact. Are any mechanisms foreseen to control such side-effects of the project?

Conclusions and Recommendations

207. The project can become much more effective by developing and applying mainly process criteria (rather than the currently proposed criteria focusing on measurable results and “financial sustainability”) for fostering innovation for sustainable development.

208. The project can also become much more credible and effective by drastically reducing emissions caused by the project itself by burning fossil fuel.

209. Overall, we support its objective and recommend the approval of this project.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

210. The Development Market Place is an almost 10 year old initiative of the WB aiming at supporting development innovative projects.

211. The DM 2009 is related to the climate change adaptation issue at community levels (climatic extremes, fresh water, soil fertility and agriculture).

212. Around 25 projects are targeted (k\$50 – k\$300 per project).

213. *The initiative is comparable to the Small Grant Support Initiatives put in place by the FFEM. It has to be supported jointly by the WB and the GEF.*

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

50. Algeria : MENARID Conservation of Globally Significant Biodiversity and Sustainable Use of Ecosystem Services in Algeria's Cultural Parks [UNDP]

COMMENTS FROM GERMANY

214. (Project)... can be supported without a need for further comments.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

215. The project aims at strengthening the biodiversity protection in Algerian cultural heritage sites, in particular, the sites of Tassili and Hoggar.

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

51. Indonesia : SFM Sustainable Forest and Biodiversity Management in Borneo [ADB]

COMMENTS FROM AUSTRALIA

216. The proposal fits with Indonesia priorities and other activities. However, the proposal is ambitious, aiming to do many things without a great deal of funding. The project objective is very broad – to "ensure effective management of the forest resources and biodiversity" - and entails that any number of activities would be relevant, a large number of which are outlined.

217. Consequently, it is unclear whether the activity is focusing on reducing emissions (REDD), biodiversity conservation or sustainable forest management. If all of these outcomes are sought, there is no clear link between the different areas. All five components are closely interlinked and the proposal would be strengthened by an indication of these links. For example, strengthened institutions (Component 1) are required to improve land use planning and reduced emissions (Component 2) and to secure sustainable financing (Component 5).

218. Of particular interest to the Australian Agency for International Development (AusAID) is the plan to develop a greenhouse gas emission baseline for Indonesian Borneo. AusAID would be very interested in developing a link between this work and similar work undertaken in the bilateral Australian-Indonesian Kalimantan Forests and Climate Partnership (KFCP). KFCP will develop a baseline for a particular site in Central Kalimantan and some of our work could be shared, while the KFCP would benefit from a greater understanding of the baseline for all of Borneo.

COMMENTS FROM GERMANY

219. The project proposal is supported in general but further amendments concerning donor coordination is needed.

220. Germany already supports a programme in Indonesia "Forest and Climate change". One of its components also aims to improve sustainable resource management, nature protection and the situation of local livelihoods in the Heart of Borneo-area. The project proposal under section "E" does not make any reference to other initiatives by bilateral donors to ensure coherence, to make use of synergies and to avoid duplication of activities.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

221. The project aims to support the biodiversity protection of the forest ecosystems in Indonesia. The expected outcomes are the strengthening of the institutional framework, the support to the incentive mechanisms (REDD, Certification) and the protection of specific threatened ecosystems.

Opinion: Favourable.

52. Philippines : CTI Integrated Natural Resources and Environmental Management Sector [ADB]

COMMENTS FROM GERMANY

222. The project concept requires revisions, in particular considering the mandate and capacity of the Department of Environment and Natural Resources (DENR) in the Philippines. So far, DENR has a mandate in protected areas declared under the NIPAS Act. The latter, however, is often disputed by Administration of Local Government Units and Provinces, which are mandated to implement Natural Resources and Environmental Management by law. A consensus and cooperation is thus essential to achieve sustainability.

223. The revisions should include proposals for an improved staff capacity of DENR plus a project steering structure which involves line agencies, NGOs and LGUs because the expected outcomes require a close collaboration of key stakeholders. However, in view of the limited implementation capacity of DENR, endowment of e.g., NGOs could be envisaged.

224. The revised proposal should also consider a concept for monitoring of environmental parameters, in particular water quality plus the impact of the project outcomes on marine and terrestrial biodiversity including livelihood aspects of the population concerned.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

53. Tanzania : SFM Sustainable Woodland Management in the Miombo Areas of Western Tanzania [UNDP/World Bank]

COMMENTS FROM GERMANY

225. Further revision is needed for this proposal.

226. The project proposal contains a bundle of valid information and proofs a knowledgeable background of the author. However, Germany shares the view of the STAP. Also we see a discrepancy between the problems described, the large project area and the expected outputs by the project on the one hand and the quite small budget of 2 million per year on the other hand. The project seems to be too ambitious the way it is designed.

PERSISTENT ORGANIC POLLUTANTS

54. Regional (Angola, Burundi, Djibouti, Eritrea, Ethiopia, Comoros, Rwanda, Sudan, Uganda, Congo DR) : AFLDC: Capacity Strengthening and Technical Assistance for the Implementation of Stockholm Convention National Implementation Plans (NIPs) in African Least Developed Countries (LDCs) of the COMESA Subregion [UNEP/UNIDO]

COMMENTS FROM GERMANY

227. STAP recommendations should be implemented. With regard to STAP comments N°3 (strengthening regional analytical and monitoring capacities), the SC COP4 decision regarding technical assistance should be taken into account. This decision emphasises the establishment of SC regional centres. However, currently none of the nominated regional centres in Africa has yet met the requirements for nomination. Many of the proposed centres lack in-house analytical and monitoring capacities. In line with the strategy for technical assistance discussed during COP4, first priority should be given to strengthening of the proposed regional centres, before considering sub-regional centres. The project should support capacity building in those regional centres that have a fair chance to be nominated as SC centres. This is preferable to current plans which carry the risk of spreading efforts too thin at sub-regional or national level. Capacity building should be extended in a broader manner, targeting chemicals management in general, not only those chemicals regulated under the SC. As mentioned in COP4 guidance document to the GEF, sufficient financial support to sustain new monitoring activities should be provided at regional rather than sub-regional and national levels through this project.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

228. The project proposes to support the partner countries in the implementation of their National Implementation Plans relating to POPs as part of their commitments toward the Stockholm convention.

229. The POP targeted are PCBs, obsolete pesticides and DDT, POP produced by the combustion of landfill, industrial or agricultural wastes. The considered activities are ranging from institutional to technical support. They target capacity building of public and private stakeholders as well as a clear identification of the problems the countries are facing.

230. *The preventive, informative and methodological approach of the project is necessary. It will need to rely later on follow up ground actions which can be costly to eradicate some of the products.*

231. *The articulation with the other GEF POP supported programs (PCB, African Stockpile) will be crucial in the process.*

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

55. Egypt : Integrated and sustainable POPs Management Project [World Bank]

COMMENTS FROM GERMANY

232. STAP recommendations should be taken into account.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

233. The project proposes to assist Egypt to manage its PCB, Dioxins and Furans (POP produced by combustion of wastes) and obsolete stockpiles.

234. The activities proposed do not raise any question. A careful attention should be paid though to the use of lesson-learned from the first phase of the African Stockpile Program on Obsolete pesticide.

235. *The project should consider in particular developing a prevention component to avoid the generation of new stock of pesticides building on the on-going work down in Tunisia with FFEM and FAO support.*

Opinion: Favourable.

56. Eritrea : Prevention and Disposal of POPs and Obsolete Pesticides [FAO]

COMMENTS FROM GERMANY

236. Germany agrees to the project proposal. Changes outlined below should be made during further planning steps and during project implementation. Before CEO endorsement Eritrea should follow the procedures for notification of DDT use stipulated in the Stockholm Convention.

237. Comments:

- The project has no comprehensive training and extension strategy to implement IPM at farm level in the various crops concerned. Experiences from IPM programmes all over the world have shown that it is generally not sufficient to train a few staff at national level without knowing and effectively addressing the constraints for IPM implementation at the farm level. FAO itself has a wealth of experience in training farmers and field extensionists; those experiences should be used to develop a meaningful IPM programme. Only with such kind of programme, significant changes in pesticide and pest management practices at farm level can be achieved.
- Project component n°1 expected outputs n° 2: Although Phase I of the project has been completed, it is still not clear which share of the 400 tons obsolete pesticide stocks belong to the POPs category. Please verify whether it is 1400 m2 or m3 of contaminated soil?
- Continued DDT use is mentioned in the project proposal. However, Eritrea has not yet notified the Secretariat of the Stockholm Convention of its intention to use DDT (see Provisional DDT Register Pursuant to Paragraph 1 of Part II of Annex B of the Stockholm Convention, accessed 1 June 2009). The project should not be endorsed by the CEO before the procedures stipulated in that Paragraph of the Convention are duly respected by the Government of Eritrea.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

57. Honduras : Strengthening National Management Capacities and Reducing Releases of POPs in Honduras [UNDP]

COMMENTS FROM GERMANY

238. There is no co-funding from the private sector included. It is general practice in GEF-funded projects dealing with environmentally sound management and disposal of PCBs from transformers and capacitors to demand significant amount of co-funding contributions from the private sector. If funds from the private sector are mobilised, the risk for project implementation – currently rated by the GEF agency as “medium” - would probably decrease.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

58. Mozambique : Disposal of POPs Wastes and Obsolete Pesticides [FAO]

COMMENTS FROM GERMANY

239. Germany agrees to the project proposal. Changes outlined below should be made during further planning steps and during project implementation. Before CEO endorsement Mozambique should follow the procedures for notification of DDT use stipulated in the Stockholm Convention.

240. Comments:

- Project component 1, expected outputs 4.3: There is no indication of the expected quantity of highly toxic pesticides to be removed as part of this component. Furthermore, there is no indication which quantity of the pesticides to be disposed belongs to the POPs category as listed under the Stockholm Convention.
- It should be explained in detail why the project includes activities in Botswana (see page 5, 3rd line from the top).
- The project proposal mentions improved management of imported DDT for malaria control. Mozambique has requested with the Stockholm Convention an exemption for public health use from “2005 up to 2008” (see Provisional DDT Register Pursuant to Paragraph 1 of Part II of Annex B of the Stockholm Convention, accessed 1 June 2009). The project should not be endorsed by the CEO before the procedures stipulated in that Paragraph of the Convention are duly followed by the Government of Mozambique, including a justification for the continued need for DDT use.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

241. The project proposes to assist Mozambique in the disposal of its POPs wastes and obsolete pesticides stockpiles. France co finances a similar project in Tunisia and Mali and thus reiterates its support to the approach.

242. *Building on the experience of those 2 projects, it recommends paying a special attention to prevention activities beyond disposal and elimination of the current stocks to ensure that new stock do not reappear.*

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

59. Nigeria : Less Burnt for a Clean Earth: Minimization of Dioxin Emission from Open Burning Sources [UNDP]

COMMENTS FROM GERMANY

243. We strongly advise the GEF agency to focus project activities on one particular sector only to enable sound project management and to maximize impact across the country. The project activities should target exclusively municipal waste management. Component 4 should be removed from the project at the present stage as the agricultural sector is targeted. The STAP comments clearly point at the complexity of issues surrounding current bush burning practices. The issue of bush burning should be addressed within a land degradation or forestry protection framework. Isolated action on UPOPs in this area will be not cost-effective.

COMMENTS FROM SWITZERLAND

Overall Comments

244. The project focuses on two relevant sources of UPOPs in Nigeria: uncontrolled burning of municipal waste and burning bush clearing. The generic strategy chosen seems to be appropriate, but many questions are still open. It seems that the current environmentally unsound practices of open burning have a strong economic background (people living from waste separation using burning as a separating and compacting method). The project aims at helping to introduce Integrated Waste Management Strategies, but it is somehow open what exactly this means, how such strategies can contribute to UPOPs-reduction and how the economic background of the people concerned is taken into account.

245. Also in the case of bush clearing the general idea is clear, but the strategy (mainly awareness raising) is somehow poor (how would you explain the relevance of TEQ to people in the bush?) and neither are alternatives discussed nor are risks and benefits of the current practices shown (perhaps the benefit of reducing POPs has to be seen in a context of other risks like hygiene, pest control, etc.).

Questions, Concerns and Challenges for further Project Preparation

246. It is not clear how composting will work technically. Is there a separate collection of compostables planned or separation of collected municipal waste (which probably would not lead to good results)?

247. Is separation of other waste categories (e.g. metals, glass, paper, batteries, plastics, etc.) through separate collection also planned? What would be the destination of these materials? (probably these materials are more important with respect to UPOPs).

248. It should be shown exactly how this project will assist the implementation of Integrated Waste Management Strategies (responsibilities in the two projects, persons involved, milestones). How is it possible to make sure that there is a common strategy for both activities? How is double financing of the same activities avoided?

Conclusions and Recommendations

249. The project idea to reduce significantly UPOP emissions from uncontrolled burning of municipal waste and from burning bush clearing is clearly relevant. But important questions still are open. The proposal needs minor and major revision.

250. Therefore, we support its approval, but expect that in further planning special attention is given to the questions raised above.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

**60. Tajikistan : POPs Pesticide Elimination, Mitigation and Site Management Project
[World Bank]**

COMMENTS FROM GERMANY

251. Comments from Germany:

- Budgeted costs for pesticide disposal seem to be on the higher side. Final disposal of 800 tons of obsolete pesticides by means of incineration should not exceed USD 4,000 per ton.
- We have doubts that a co-financing contribution of USD 6.42 million will actually be made available for the component *Reducing farmer reliance on POPs pesticides*. According to accessible information, the World Bank Cotton Sector Project will only do Farmer Extension in some districts of one province, thus involving a limited number of farmers. General training on farm management, book keeping etc. should not count as co-financing contribution for a project in the POPs focal area. Only the share of the project costs that is spent for genuine extensionist and farmer training on IPM technologies and strategies may qualify as co-financing. More detailed information should be provided on the co-financing contribution.
- The section on cost-effectiveness needs significant improvement. Cost-effectiveness of the IPM training programme cannot yet be assessed. Information is lacking on the number of targeted farmers, their pesticide use patterns and the potential to reduce pesticide use in cotton production. Also, the assessment of the cost-effectiveness of the pesticide disposal options needs to be presented in a more transparent manner.

COMMENTS FROM SWITZERLAND

Overall Comments

252. The purpose of the project is for Tajikistan of high importance. As no investment has been made in disposing stockpiles and, even more urgent, also in safeguarding sites, project component 1 is to be implemented as soon as possible. The importance of project components 2-4 is given to complete and sustain the activities in project component 1.

253. The description of the issue, the approach and the technical and economical background of the project within the PIF document are in line with standard approach corresponding to the

overall requests. The coordination with other regional activities in the field is foreseen and activities are planned to organize this cooperation. The value added by GEF involvement is reported and plausible. Co-financing of local partners is important and will contribute substantially to final disposal activities.

Questions, Concerns and Challenges for the further Project Preparation

254. Questions, Concerns and Challenges for the further Project Preparation:

- Who will be trained, from which institutions, who will be the trainers?
- Who is responsible for an applied setup and how will it be monitored?
- What is in general the content of the monitoring system and which independent authority will be responsible?
- Who is the project leader and who is responsible for time schedule and budget?
- What has been done so far in the domain of the targeted objectives in Tajikistan, who are the main national and international project teams involved, etc.?

Conclusions and Recommendations

255. Contribution to project 2 in relation to the other project seems to be quite small. Maybe a larger budget for the field work and reducing budget of project 2 makes sense. This has to be clarified in more detail. Points b, c are described sufficiently at this stage of the project submission status, but have to be elaborated in more detail in the next phase.

256. With respect to the national Pesticides activities in general and the inventory specifically it is re-recommended that the following key issues are considered:

- All applications of Pesticides should be considered in the inventory and the National Action Plan. According to the findings, further or new priorities can be set if necessary,
- An important part of the inventory should also be possibly contaminated soil and sites.
- It is of utmost importance that the data obtained during the inventories can be recorded efficiently until the SC requirements have been fulfilled. Therefore, a standardized database for Tajikistan should be one of the priority activities.

NEW PROGRAMMATIC APPROACHES IN THE JUNE 2009 WORK PROGRAM

1. BIODIVERSITY: GEF Coastal and Marine Program (IND-BD) [UNDP]

COMMENTS FROM SWITZERLAND

Overall Comments

257. The goal of the proposed programmatic approach and the two projects subscribed to it is to demonstrate multi-sectoral approaches to mainstream biodiversity conservation objectives in economic activities in two marine eco-regions of India. The programme covers three components: (1) mainstreaming of coastal and marine biodiversity conservation into sectoral policies and a knowledge management system, (2) institutional capacity development, and (3) sustainable community livelihoods and natural resource use in the buffer of marine protected areas and other areas of high biodiversity value. As a result of the proposed programme, the main underlying barriers to sustainable coastal and marine ecosystem management will have been removed in the two demonstration sites and key production activities will be taking place in ways that are more compatible with the maintenance of the coastal and marine biodiversity at the landscape level.

258. Overall the PDF of the programmatic approach and the corresponding PIF of one of the two subscribed projects (which is also part of WP C.35) seem well described and consistent with GEF criteria and strategies.

259. However, the range of production activities to be tackled is wide and covers fisheries, aquaculture, medium and large-scale industries, ports, and tourism. Therefore, the goals of the programme are to be considered as rather ambitious and merit special attention. Our main questions and concerns are outlined below.

Questions, Concerns and Challenges for further Programme Refinement

260. Questions, Concerns and Challenges for further Programme Refinement:

- ▶ **Measurable impact in the field? And what about the legal framework (and barriers) and its enforcement?**

The programme puts emphasis on mainstreaming biodiversity conservation into sectoral policies and will have to deal with a wide range of threats to biodiversity (e.g. regarding the industrial activities they include: industrial discharges and

spillage of offshore oil exploration and production and shipping that result in pollution and bio-accumulation of heavy metals and synthetic compounds).

Nevertheless, little information is found in the PDF on the legal framework and its enforcement. For us it is difficult to understand that the change towards more environmentally sound industrial production would take place only on a voluntarily basis. This point has to be clarified; otherwise it is difficult to believe that any impact in the field will be measurable.

► **Need for a sound baseline. Agree with concerned sectors on the input data. Identify the most relevant threats and prioritize measures.**

At a first glance, the project framework of the subscribed Godavari River Estuary Project (PIF BD3936) seems well-detailed and also refers to indicators regarding biodiversity (“*population of indicator species [e.g. Olive Ridley turtles] remains stable*”). The related expected output however is little concrete: “*fisheries, industrial, port and tourism development policies of Andhra Pradesh incorporate coastal and marine biodiversity considerations*”.

What are the current trends of those species? Without baseline and assessment of the current trends, it is not possible to appraise whether such a goal can be attributed as a success of the programme.

Please note that such a baseline should not cover exclusively biodiversity, but should include also all those production activities that the programme tries to deal with.

There is a need for both an identification of the relevant sources, and for a prioritization of measures, otherwise the programme risks being overcharged and dispersing its efforts. Unfortunately, so far neither the programme’s PDF nor the subsequent project PIF clarify the ways to proceed in this respect.

► **Institutional arrangements?**

The current programme involves several sectors, thus the design of the institutional arrangements is crucial for its success. The PDF leaves quite a lot of questions still open. Thus more detailed information must be provided in, and is expected from, the final documents.

► **The risk that cooperation from industries may not be forthcoming initially due to apprehension that their economic interests would be compromised, and that the benefits gained from participation in the project may be minimal.**

We consider this risk (identified by the programme designers) as substantial and the corresponding mitigation measures discussed in the PDF as comprehensible but as not sufficient. We believe that a potential to reduce that risk lies with the

legal framework (see also our comments above), and therefore recommend analyzing further related opportunities and barriers.

► **Little information on co-financing.**

Following the PDF, GEF financing of the programme would be 10.5 million USD, whereas co-financing would come up to the amount of 17.7 million USD; a cash and in-kind contribution by the project government.

In order to well-situate the GEF contribution, information about the type of the co-financed activities has to be given.

Conclusions and Recommendations

261. We fully support the current programme and recommend its approval. Nevertheless, for further planning, a fine-tuning of the focus is needed and we expect that the questions discussed above are taken up.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

262. The overall program concept is good and relevant in articulating the mainstreaming of coastal and marine biodiversity conservation into sectoral policies, institutional capacity building and sustainable community livelihood and natural resource use in the buffer of marine protected areas and other areas of high biodiversity.

263. *The project could be improved by detailing sustainable financing scheme. It would be relevant to request for every site of intervention that action plan need to be supported by a detailed business plan with sustainable financing strategy.*

Opinion: Favourable opinion subject to the above consideration.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

2. INTERNATIONAL WATERS: Mediterranean Environmental Sustainable Development Program (MED) [WORLD BANK]

COMMENTS FROM SWITZERLAND

Overall Comments

264. The Mediterranean Environmental Sustainable Development Program (Sustainable MED) objective is to enhance and accelerate the implementation of transboundary pollution reduction, improved water resources management, and biodiversity conservation measures in priority hotspots and sensitive areas of selected countries of the Mediterranean basin that would help achieve the Strategic Action Plan's targets. The Sustainable MED program is a continuation of the Investment Fund of the GEF/IWs Mediterranean Sea Large Marine Ecosystem Strategic Partnership which was approved by the GEF Council in August 2006.

265. To secure and enhance the delivery and impacts of the Sustainable MED program, it will seek to put in place "sustainability elements" supported by the GEF. This will include: (i) the initiation of a governance structure consisting of a "Higher Council for Environment and Sustainable Development" for renewed and coordinated assistance; and (ii) the initiation of a "Know-MED Center" which will allow for a targeted approach to knowledge generation, capacity building, informed decision making, and overarching technical assistance for new investments.

266. We concur with the STAP's advisory response that the elements on governance structure and a technical assistance centre can become important foundational components for the sustainability of the investment component. As a prerequisite to this, the relevance of the Sustainable MED program to the riparian countries' economies will have to be proven.

Questions, Concerns and Challenges for the further Project Preparation

267. The given justification of the GEF grant financing is the pilot nature of some of the investments as well as the significant global importance of the transboundary resources managed. It is further mentioned that, given the urgency of addressing the water crisis and the constraints faced by a number of the countries in the region due to the food crisis and economic downturn, it is expected that grant funding will probably have a great impact. While acknowledging this rationale, we also see a certain risk that the grant financing lessens the pressure for a stringent needs testing from the perspective of the riparian countries' economies. Hence, an early determination of well targeted knowledge products for identified user groups will be a critical issue for the sustainability of the knowledge system.

268. The Mediterranean Sea Region is generally expected to become one of the most affected regions in terms of climate change, particularly in terms of pronounced future droughts. We feel that developing and monitoring options for climate change adaptation could thus be of joint importance for the riparian countries and could constitute a directional issue for the Sustainable MED program. We would therefore welcome an early development of this investment type.

269. The proposed Higher Council is expected to consist of one member from each participating country at cabinet or ministerial level and to also include representatives from all line ministries. The role of the Council is intended to be complementary to the role of the Mediterranean Commission on Sustainable Development which includes only representatives of Ministries of Environment. We assume that the sustainability of this new governance structure will mainly depend on how far a complementarity can be achieved between the proposed Higher Council and the existing Mediterranean Commission. While developing the TORs for the Higher Council, thoughts should be given on how to assure that the cabinet or ministerial level will represent the overall governmental position.

270. The identified projects under the Sustainable MED program will all require some payment for environmental services in one or the other form to successfully run beyond the program. We therefore fully support the proposed focus of the technical assistance to the public sector on this issue.

271. Regarding co-financing: First of all we welcome and recognize the enormous amount of co-financing. Following the PDF, GEF financing of the programme would be 50 million USD, whereas co-financing would come up to the considerable total amount of 737 million USD; including among others 547 million USD in the subscribed Tunisian project, a World Bank loan (with GEF agency source) of 210 million USD, and an UNEP grant (again with GEF agency source) of 3 million USD. We would like to outline the following observations:

- In general, we expect that further information on co-financing will be given in the final project documents, not only on the sources but also on the type of the co-financed activities. For that we underline the existing GEF policy and rules not to consider baseline-financing as co-financing.
- Is it correct to consider contributions as co-financing, if the source is the GEF itself, as mentioned above? In our point of view, it should not, as otherwise it puts wrong the overall picture of co-financing, and last but not least would contradict the efforts regarding sustainability.

Conclusions and Recommendations

272. We recognize the importance of the targeted ecosystems, their transboundary character, the relevance of the program objectives and their consistency with GEF strategies and strategic programs.

273. We recommend continuing with program preparation while taking into account the issues raised above. And particularly regarding co-financing, we expect that detailed information will

be given, showing among others that GEF rules regarding baseline- & co-financing are respected.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

274. The program works out to involve the actions implemented within the framework of the former regional projects (PAS MED, PAS BIO). It includes 10 projects aiming to improve fresh and ground water management in the riparian countries on the Mediterranean Sea.

275. *Some of these projects are co funding by FFEM (Gulf of Tunis, Nador - Morocco). It should be interesting to plan the coordination of the actions implemented within the framework of these projects.*

Opinion: Favourable.

**WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS
(REFERENCE TO GEF C.35/7)**

3. POPS: Capacity Strengthening and Technical Assistance for the Implementation of Stockholm Convention National Implementation Plans (NIPs) in African Least Developed Countries (LDCs) and Small Islands Developing States (SIDS) [UNEP/UNIDO]

COMMENTS FROM GERMANY

276. Comments from Germany:

- Component 5 aims at identification of contaminated sites. The amount of resources foreseen for this component seems to be on a higher side, if only site identification and development of remediation plans is foreseen. For a total amount of USD 1.6 million, it should be possible to determine the type of chemicals by analytical surveys and to implement the most urgent provisional safeguarding measures in at least a fair number of sites to protect human health and the environment from leakages of chemicals.
- The program should provide opportunities for regular exchange of information and for sharing of best practices with GEF projects already approved in non-LDC and non-SIDS countries in Africa, e.g. the Nigeria UPOPs project of the June 2009 work program.
- The STAP recommendation to extend capacity building to other toxic chemicals should be implemented.

COMMENTS FROM FRANCE (RECEIVED JULY 22, 2009)

277. The program targets capacity building and technical assistance to LDCs and SIDS relating to POP. It proposes a mix of activities focused on legislative and regulatory framework, capacity building of key public and private stakeholders, disseminating adequate methodologies and tools in the industries to limit the “collateral” production of POPs, dissemination, etc.

278. The general principles of this program do not raise any specific issue.

Opinion: Favourable.