

Government of Canada's Comments on Draft GEF-6 Programming Directions (GEF/R.6/13/Rev.1)

Overall Comments

- Canada welcomes the revised programming directions and appreciates the improvements made in strengthening the focal area strategies, notably regarding their improved responsiveness to MEA CoP guidance.
- The GEF's overall focus should continue to be on programming related to the legally-binding instruments for which the GEF serves as financial mechanism, with some strategic programming on voluntary initiatives, guided by the generation of co-benefits.
- Canada welcomes the GEF's efforts to mobilize the private sector and the focus on synergies amongst focal areas, consistent with country-driven programming.
- Canada requests greater transparency regarding the proposed use of all focal area set-asides, including their alignment with MEA CoP guidance.
- As proposed, Canada does not support the "Signature Programs", given concerns regarding their consistency with MEA CoP guidance and country ownership, as well as the scale of the initiative being proposed. If these concerns were addressed, Canada could favourably consider a smaller, pilot initiative that uses existing funds, including national allocations and global/regional and private sector set-asides.

Comments by Focal Area Strategy, plus the Sustainable Forest Management Strategy, follow.

Draft GEF-6 Biodiversity Strategy

- Canada welcomes the revised draft of the GEF-6 Biodiversity Focal Area Strategy, as it better explains its alignment with the 2020 CBD Strategic Plan, including the 20 Aichi Targets.
- To further improve the Strategy’s alignment with the priorities of CBD Parties, we propose more emphasis and resources be placed on Program 3 (Managing the Human-Biodiversity Interface) and Program 7 (Ridge to Reef+: Maintaining Integrity and Function of Globally Significant Coral Reef Ecosystems), with less emphasis and resources for Program 1 (Sustainable Financing of the National Ecological Infrastructure), Program 6 (Implement the Cartagena Protocol on Biosafety), and Program 9 (Implement the Nagoya Protocol on Access and Benefit Sharing), including given the focus on activities that are largely soft investments (i.e., Program 1).
- Program 3 (Managing the Human-Biodiversity Interface) is particularly important, especially activities related to expected outcomes 3.2 – 3.4 on biodiversity outside of protected areas. Given that historically less investments have been made on biodiversity outside of protected areas, compared to in protected areas, we propose significantly increasing the funding to address their relative underfunding to date. Similarly, seascapes and marine ecosystems should also be prioritized and allocated additional funds in GEF-6, as less work has been done on these areas compared to terrestrial ecosystems. (In terms of the Strategy’s organization, we note that outcomes 3.2 – 3.4 might be better placed under Biodiversity Objective 2, “Reduce threats to globally significant biodiversity”, as these outcomes seem to be less related to the actual management of protected areas.)
- For Program 6 (Implement the Cartagena Protocol on Biosafety), it is not clear why substantially more resources are being proposed, as in GEF-5, \$40 million was provided to support all remaining Parties to have Biosafety Frameworks in place. Similarly, given that the Nagoya Protocol is not yet in force, it is not clear why an almost doubling of investments in this area is proposed. We request the Secretariat to provide a clear rationale for these, or to scale back, as appropriate.
- We note that Program 4 (Reducing Widespread Poaching of African Elephants and Rhinos and Illegal Trafficking of Elephant Tusks and Rhino Horns) and Program 5 (Avoiding Imminent Extinction in Island Ecosystems: A Time-sensitive Agenda) explicitly limit their geographic scope. As previously noted, our view is that both proposed Programs address critical CBD priorities of endangered species and invasive alien species. While we understand the need to focus efforts based on the potential to generate global environmental benefits, we do not agree with limiting recipient country eligibility from the outset. We understand that Program 5 could include priority work on invasive alien species outside of islands, if demand exists. Indeed, if demand for projects in non-island areas is high, the GEF should necessarily prioritize projects based on expected results. Similarly, if there is high demand to address endangered species outside of Africa and species other than rhinos and elephants, and if the potential for global environmental benefits is high, the GEF should consider supporting these projects. Accordingly, we request that Programs 4 and 5 be made more generic in their scope and be renamed “Program 4: Reducing threats to the most

endangered species” and “Program 5: Avoiding species extinction due to invasive alien species”.

- Regarding Program 4 (Reducing Widespread Poaching of African Elephants and Rhinos and Illegal Trafficking of Elephant Tusks and Rhino Horns), Canada does not support the proposal to have the GEF make stand-alone investments in fighting illegal wildlife trade. GEF Council members have agreed that the GEF, in coordination with the CBD Secretariat, should seek opportunities to generate co-benefits between CBD-driven GEF biodiversity focal area projects and other biodiversity-related conventions for which the GEF is not the financial mechanism, including CITES. However, the current Program does not approach this issue that way. Instead, it specifically targets initiatives that are within the CITES mandate and outside the CBD’s direct mandate. As a constructive way forward, and as noted above, Program 4 should take a more generic approach and be revised as appropriate.
- Additional details on what is being proposed regarding the biodiversity focal area set-asides are requested, particularly on the amount to be used for global/regional projects, and the amount to be used for the updating of National Biodiversity Strategy and Action Plans and funds for national reports. We also request a clear description of the proposed incentive system under the focal area set-aside and its intention.
- Given that funding for the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) is voluntary and it is not covered under GEF’s mandate, we cannot support providing GEF funds as proposed (on pages 30-31).

Draft GEF-6 Chemicals Strategy

- Canada welcomes the revised draft chemicals and waste focal area strategy, as it more directly responds to, and addresses, the chemicals and waste agenda.
- Canada supports the proposed increased in the funding for this focal area, as it will help accommodate the increasing number of POPs listed under the Stockholm Convention as well as the new Minamata Convention anticipated to enter into force during the GEF-6 period. Canada further proposes that no carve-out for the proposed “signature programs” be taken from this focal area as they are unrelated to this focal area; Canada does not support the proposed \$25 million carve-out.
- Canada welcomes and supports the inclusion of the focus on innovative and sustainable financing under Program 2 (Promote innovative and sustainable financing, business models and economic approaches and solutions for eliminating harmful chemicals and waste). Program 2 responds to calls to incorporate chemicals industry involvement and mainstreaming into the discussion on chemicals financing, as agreed by countries with the UNEP Financing Options process.
- Canada supports the proposed Climate Change Mitigation focal area set-aside for coordination between the GEF and the Montreal Protocol Multilateral Fund.

- Canada strongly supports keeping the focus of GEF funding on MEAs and the approach of prioritizing within the chemicals and wastes focal area, such that greater attention is provided for initiatives where the GEF is the financial mechanism, including Stockholm and Minamata Conventions.
- We appreciate that the strategy highlights its intent to focus on legally-binding MEAs first, and then support for other activities under non-binding instruments, so long as they support those MEAs. This should be consistently reflected throughout the strategy with a focus on the following priorities:
 - The core control obligations of the relevant conventions should be addressed first, along with national reporting
 - Softer obligations, such as the remediation of contaminated sites should be of lesser priority
 - Activities under SAICM that are agreed (e.g. emerging issue activities agreed at ICCM-3, such as chemicals in products)
- Specifically, this should also be made clear in the tables at pages 87 and 88 for the Stockholm and Minamata Conventions respectively. In addition, we note that while paragraph 28 accurately reflects the importance of the MEAs in dictating priorities, paragraph 29 contradicts it in citing two obligations that are very soft. There is no guidance from Stockholm COPs 1 to 6 that the GEF should deal specifically with stockpiles, contaminated sites, supply chains or green chemistry.
- To more clearly set out the funding intentions of the Strategy, we request that proposed allocations are given for the programmes outlined. This could be done by adding notional allocations to the Chemicals and Waste Focal Area results framework on pages 89-92, consistent with the results framework model used for other focal areas.
- BAT/BEP to be funded are those decided by the respective COPs and as such, the strategy should be more clearly written to indicate that best available techniques that are funded are those decided upon by the Stockholm and Minamata Conferences of the Parties. For example, paragraph 29 states that “The GEF will focus on working with governments and the private sector to find alternatives to toxic chemicals and reducing waste generation through green chemistry and other innovative approaches.” It should be clear here that the GEF would fund those alternatives and technologies that the respective MEAs COPs have decided are the environmentally sound ones.
- Canada does not support the proposed GEF funding of regional centres of the Conventions (page. 76, paragraph 38). This funding is not consistent with those MEAs’ decisions of having self-sustaining centres; a change to this approach would have to be decided by the respective COPs.
- With regards to reporting, Program 3 (Support conventions reporting and national plans and promote their integration into national planning processes and actions) needs to reflect that

the reporting issue is relevant only for Parties to Stockholm, given that the GEF has not funded reporting by CEITs under the Montreal Protocol in the past, and that the Mercury Treaty's Parties will not be reporting in this replenishment period. This will enable the funding available to be targeted appropriately. In addition, as there is no "joint reporting" under the synergies process, this reference should be removed from paragraph 51.

- Similarly, for Program 3, the National Implementation Plans (NIPs) for Stockholm are only updates and therefore should be streamlined and less costly in the overall resource allocation for this activity. Further, Mercury NIPs are optional and the COP may choose to provide guidance, which should be taken into account when determining their level of priority.
- In Program 4 (Support global monitoring, development of registries, inventories and data collection), most activities outlined are COP activities funded through the Stockholm Convention's budget and this is anticipated to be done in the same manner for the Minamata Convention. Thus the rationale for the last sentence of paragraph 43, which states that Strategic Objective One "will also provide resources to monitor the effectiveness of the conventions", is unclear since both Stockholm and Minamata have collective processes for effectiveness evaluation, and this is not a matter for individual funding efforts.
- In regards to the proposed programming on ozone depleting substances (ODS), this should respond to an analysis of what ODS consumption is left, versus what projects have already been approved. This analysis should be included in future iterations of the document, in order to justify the level of resources allocated to Program 7 (Complete the phase out of ODS in CEITs and assist Article 5 countries under the Montreal Protocol to achieve climate mitigation benefits).

Draft GEF-6 Climate Change Strategy

- The GEF should continue to support climate change as a top priority and at a level similar to GEF-5; given the uncertainty in the climate finance architecture, the GEF should continue to be a source of certainty.
- Canada welcomes the proposed support related to short-lived climate pollutants, the SME small grant/loan program (mentioned in Annex 1), and the proposal to integrate national reporting and enabling activities into national planning processes, including the building of domestic capacities.
- The focal area strategy should focus on areas where the GEF has received guidance from the UNFCCC. In that regard, the GEF should not focus its scarce resources on funding areas like public transit or large-scale expensive technologies, such as carbon capture and storage.
- Canada welcomes the focus on Sustainable Forest Management and agriculture within the focal area strategy, and requests that the GEF clarify its relative niche and actively ensure it avoids duplication with other bilateral and multilateral programs related to REDD activities (e.g., FCPF, UN REDD, etc.).

- In terms of the references made to monitoring, reporting, and verification activities, the GEF should ensure that countries utilize existing/agreed methodologies as much as possible and avoid creating duplicative efforts.
- Canada requests additional details regarding the climate change mitigation focal area set-aside, particularly how the activities are related to UNFCCC guidance.

Draft GEF-6 International Waters Strategy

- Canada notes that under GEF-5 some funding was made available as part of this focal area to address the issue of sustainable global fisheries in areas beyond national jurisdiction. Canada proposes that this approach be continued in GEF-6, and that the focal area include support for sustainable global fisheries management; Canada does not support a special carve-out for a signature program that should be done as part of regular focal area programming. To reintegrate the programming within the focal area, focus could be shifted from the first two objectives of the focal area (“Catalyze sustainable management of transboundary waters” and “Balancing competing water-uses in the management of transboundary surface and groundwater” respectively) to the third objective (Rebuilding marine fisheries, restore and protect coastal habitats, and reduce pollution of coasts and LMEs).
- Canada requests that the focal area objectives 1 and 2 be strengthened, as they have relatively weak connections to the GEF’s core mandate of generating global environmental benefits.

Draft GEF-6 Sustainable Forest Management Strategy

- Canada welcomes the proposed Sustainable Forest Management Strategy, as it supports projects that generate co-benefits amongst GEF focal areas, and strengthens the sustainability of the GEF’s impact.
- The draft Strategy could be further improved by: being more explicit about the GEF increasing responsiveness to national plans and strategies; ensuring that the projects and/or programmes are country-led rather than project-led; and, having a landscape level perspective.
- In addition, while there is some recognition of related initiatives or programmes (e.g., FCPF and UN REDD), the potential synergies should be more fully recognized in the Strategy. When considering programs of projects in the REDD+ or the land use, land-use change and forestry (LULUCF) area, the GEF should first look for opportunities to contribute to addressing financing gaps in the implementation of countries' Readiness Plans and/or national REDD+ strategies.