

## China

### Comments on Draft GEF-6 Programming Directions

Dear Sir or Madam,

Regarding the proposed document on programming directions submitted to the Paris Replenishment meeting, China has comments and suggestions as follows.

1. We suggest the Secretariat make the document more concise and simplified, and prioritize the key areas under each of the focal areas in accordance with the comments made by the participating countries.

2. The programming document proposed many detailed programs under each focal area. We would suggest that the Secretariat revert to the traditional practice whereby it only sets out strategic objectives and broad priorities. The specific project as well as programs will be designed by the recipient countries in accordance with the national circumstance and needs. The description of the key areas should take the guidance of the conventions into full account, and be relatively broad rather than being too detailed. For instance, program 5 under the biodiversity strategy is named “avoiding imminent extinction in island ecosystems”, in fact the Aichi Target 9 with respect to invasive alien species and pathways does not differentiate between island and continent ecosystems. Therefore, we suggest to rename it as “to prevent invasive alien species to protect globally important biodiversity”. We suggest that the Secretariat make similar adjustment on other programs and replace the name of “ programs” with “ priority areas”.

3. In general we support the proposed signatory programs, based on the understanding that it is only a pilot and will mobilize additional resources, or utilize global or regional set-aside, without impacting country allocations.

4. For programmatic multi-focal area approaches, we in principle agree with the view that environmental issues are interlinked and an integrated approach is needed. And we support the GEF to explore cross-sector programmatic projects at both regional and global levels. In the meantime, it is important to take into account the views expressed by many countries, and make it very clear in the programming document that: (i) multi-focal area projects already account for more than 40% of GEF-5 (?) projects, wider adoption of such approach will be based on solid analysis of evidence; (ii) Country ownership, demand driven, and differentiation among recipients are the key words in pursuing multi-focal area programmatic approach. Recipient countries will decide whether to adopt such approach on specific projects, and it will not become a precondition for project application.

5. On climate change: (i) we suggest deleting the description of "by stabilizing the

atmospheric concentration of carbon dioxide below 450ppm" as this lacks scientific evidence and certainty. (ii) We suggest supporting marine related activities in climate change area, including demonstration of marine energy utilization, low carbon development and emission reduction in marine industries, etc. (iii) it is important to point out that the bar on climate change mitigation projects has been raised excessively high and there are a lot of new policy conditions that run against the general trend of respecting country ownership and laxing policy conditions. For example, the document suggested promoting city or economy-wide emission reductions by the performance-based financing. In our view, this performance-based financing will be feasible at the project or sector-based level, but not at city or economy-wide level particularly in big countries. The GEF is too small to finance emission reductions at the city or national scales, and it is neither feasible to buy policies and emission reductions commitment. Another example is the proposal to design and publish scorecards to assess national policies for clean energy development and private sector engagement, and this name-it-or-shame-it approach is very controversial and will never work. And also it is inappropriate to set minimum annual emission reduction and co-financing targets for mitigation projects and require each project to have a market-based financing component. GEF should clearly hear the views of developing countries on their feasibility and practicability.

6. On biodiversity, in addition to point 2, some further comments: regarding Program 2" expanding the reach of global protected area estate", it will be difficult to expand the reach of protected areas as a result of global population growth and economic development. Thus we suggest GEF pay attention to the strengthening of infrastructure and capacity building, and rehabilitation of degraded ecosystems in existing protected areas, while making efforts in expanding the reach of protected areas. For Program 11 "taking deforestation out of the supply chain of global commodities", we think this concept is quite narrow and suggest it be adjusted as "promoting the protection of agriculture, forestry and fisheries, and sustainable use of biodiversity".

7. On land degradation focal area, the document should explain more about the severity and negative impacts of global desertification. Nowadays the world is still facing the serious situation of combating desertification in arid and semi-arid areas, and desertification has become an important barrier for relevant countries and regions against their efforts made to achieve sustainable development. The GEF should increase its support to resolve the problem of land degradation.

8. On sustainable forest management, the document mentioned that GEF will mainly play a role in promoting multiple benefits of forests and support relevant conventions on forests to realize their objectives. Considering that the Non-legally Binding Instrument on All Types of Forests (NLBI) and the United Nations Forum on Forests (UNFF) are the main channels of sustainable forest management cooperation, we suggest the GEF focus on the implementation of NLBI, realization of the four global

forest objectives and the relevant processes of UNFF, while paying attention to the objectives of other forest conventions. Regarding project activities, we think the GEF should attach importance to capacity building of developing countries, including methodology, policy and technology development of sustainable forest management.

9. On chemicals, as GEF has been designated as the financial mechanism of the Mercury Convention, we suggest the GEF Trust Fund establish a new focal area for mercury. In the meantime, an effective allocation and reporting system for the funding into POPs and mercury related activities should be set up, so as to ensure that funding needs of developing countries for time-bound implementation activities can be met. We also suggest that GEF provide support to the activities before the effectiveness date of the Mercury Convention, and key areas it supports should also cover the termination of primary mercury mining activities, the control of mercury emissions to the atmosphere, and the remediation of contaminated sites, etc.

10. On international waters, we suggest that integrated prevention and control of cross-border pollution be added as one of the key areas. With regard to Program 3.1 "reduce nutrient pollution causing ocean hypoxia", we suggest eutrophication be included as part of it.

We would highly appreciate it if you could kindly take our comments into consideration in further developing the programming document. And we look forward to a revised and more concise version soon.

Best regards,

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Ministry of Finance  
China