

China's Comments on GEF Programming Document

2013-12-23

We would like to thank the Secretariat for this updated programming document. We've noticed that some of our comments addressed during last meeting and/or submitted by email subsequently have been taken in by the current version of the document. In general, we believe GEF should target at more ambitious replenishment goal for the GEF-6, we support the GEF to pilot the Integrated Approach programs as an important innovation for GEF-6, and we generally agree with the objectives and priority programs of different focal areas. However, we still have some specific comments need to be reflected in final version of programming document.

1. On climate change, firstly, as the provision of the UNFCCC convention, mitigation action of developed and developing country should subjected to MRV (Monitor, Report and Verify) and ICA (International Consultant and Analysis) respectively, relevant wording in this document should be modified. Secondly, project objectives on national, urban and industrial emission reduction target should comply with the provisions of the Convention and set by developing country itself on a voluntary basis. Thirdly, analysis of climate change should be consistent with what is happening under

the UNFCCC convention, and not to prejudge the outcome of the negotiation.

-- Text on Para 9 on page 40 need to be rewritten, for example
“ The Durban platform...launched a process to develop a legal instrument...such instrument should seek to engage all countries to take meaningful action to reduce emissions” should be rewritten as
“ develop a protocol, another legal instrument or an agreed outcome with legal force under the convention...It’s expected that such outcome will enhance the implementation of the convention.”

--Text on para 14 ©, the sentence “necessary policies to reach 2015 climate agreement” should be deleted as it prejudge the negotiation outcome.

--Statement of “transformational shift toward a low emission development path” is not consistent with convention guidance, and need to be changed.

2. On bio-diversity, we in general agree with the objectives and programs. However, we hope that the secretariat look into the allocation across programs and make them more balanced. For example, the allocation for program 8 should be increased given the importance and pressing task of implementing ABS, and the allocation for program 9 is quite big and might be reduced.

3. On chemicals, we have four observations:

--Although the allocation for chemical focal area has been

increased, there is severe under-funding for both POPs and Mercury even in the case of high scenario. Again we would call for large replenishment size.

--Regarding mercury, we have some suggestions. On page 83 of the programming directions, regarding 31.(b) in enabling activities, only National Action Plans (NAPs) for Artisanal and Small Scale Gold Mining(ASGM) is mentioned for the Mercury Convention, we suggest that the national plan also cover other activities under the Convention, including pollution sources survey, phase-out plans for mercury-added products and manufacturing processes in which mercury or mercury compounds are used, and plans for shutting down mercury mines, etc. On page 85, program 4, "industrial boilers" is suggested to be added under 40.(b) reduction and elimination of mercury from emissive sources, "mercury mines" added to the supply chain under 40.(c).

-- It is not clear yet the method of allocating financial resources of this focal area to individual beneficiary parties. The GEF should match the financial allocation with the missions of reduction and phasing-out of individual parties defined in the Conventions, so that GEF could utilize the financial resources more effectively, and achieve the maximum of global environmental benefit.

--The programming document put a lot of emphasizes on synergies across focal areas. While encouraging multi-focal area

projects and co-benefits, the requirement should not become prerequisite condition for project approval.

4. On international waters, we have two observations:

--The objective of IW-1 “catalyze sustainable management of transboundary water system” emphasizes management and balance of transboundary water system. Considering the international acknowledged developments on Ecosystem Based Management, we suggest GEF put more emphasizes on transboundary ecosystem issues rather than focusing on transboundary water system only.

--Besides three programs under IW-3, which are reducing ocean hypoxia, prevent loss and degradation of coastal habitats, and foster sustainable fisheries, we suggest GEF to add more programs to cover some other equally important challenges, such as transboundary breeding migration and migratory species protection, alien species intrusion, overall ecological habitat vulnerability, and transboundary pollutions. By supporting above suggested programs, GEF may help developing countries to establish action plans and innovative coordination mechanisms to better handle transboundary issues.

We would highly appreciate if our comments be fully reflected in final version of programming document.