

## **China's Comments on GEF Programming Document**

We would like to thank the Secretariat for the very comprehensive programming document. It's a general comment that we believe the new approach for programming under the GEF-6 marks quite dramatic change from the previous practices. If we understand correctly, we are shifting from bottom-up and country-driven approach toward more centralized, top-down and GEF-SEC driven approach. The Secretariat is not only setting goals and objectives under each focal area, but also formulating specific programs and allocates resources to each program under each focal area. We are not sure how that can reconcile with country ownership and country drivenness. We would not repeat what Mr. Liang has already said during the discussion in New Delhi, but share some specific comments with you.

1. There are some texts in the programming document that prejudices the negotiation results and need to be revised. For instance, in climate change mitigation focal area, page 44 of the document states that "GEF aims to enable recipient countries to prepare for the new climate regime under the UNFCCC, with universal emission reduction commitments", which obviously need to be re-worded. Also on Page 63 which is about an output of program 4, "sectorial

policies and policy and regulatory framework" are set as one of the indicators, which is inappropriate given the fact there is no consensus on sectorial mitigation efforts under the negotiation process.

2. The word "programs" under each focal area are quite confusing, and can easily be interpreted as "projects" or "group of projects". We are not sure whether the Secretariat is in good position to program and manage so many projects on behalf of the recipient countries. We would rather interpret and change the word "programs" to "priority areas", and delete specific amounts of resources for each program.

3. Many proposed "programs" are quite exclusive and need to be made broader. For example, the 10 programs proposed in the biodiversity strategic planning do not fully reflect the objectives of the Convention and Aichi targets. The geographical scope and objects of protection in some programs are too specific and exclusive, which does not reflect the eco-diversity in different countries. In addition, we believe that the GEF-5 programming has already set the good framework and foundation, which should be kept consistent in GEF-6.

4. In terms of chemicals focal area, we have 3 specific comments. First, given the shortage of financial resources in the

focal area of Chemicals, we insist that activities with legally binding targets should be prioritized when financial resources are allocated. Second, given the different forced reduction targets of ODS, POPs and mercury under different Conventions, we suggest that the implementation activities of ODS, POPs and mercury should be planned separately with independent resource allocation. Third, on actions to be taken in mercury area, apart from Artisanal Small Scale Gold Mining (ASGM) and policy development, air emission, mercury-added products and mercury processes are suggested to be added. Fourth, also in mercury area, on the table on page 87 on areas to be financed, it is suggested to add coal-fired power plants, non-ferrous smelting, cement production, and waste incineration into the major sources.

5. China suggests that GEF-6 should continue to increase its support to developing countries in capacity building in a comprehensive way, instead of focusing only on enhancing capacity on synergy.

6. There seems to be too much emphasis on multi-focal area project, it is important that we should not rush on multi-focal area projects without strong evidence on the ground.

7. We suggest that we stick to the policy of improving direct access and expanding NIEs. However, it is regrettable that this

policy and practice has not been continued in the programming document.

We would highly appreciate it if our comments on draft GEF-6 programming document be fully reflected in the final version.