



**GLOBAL ENVIRONMENT FACILITY**  
INVESTING IN OUR PLANET

**COMPILATION OF COMMENTS  
SUBMITTED BY COUNCIL MEMBERS  
ON THE GEF  
NOVEMBER 2017  
WORK PROGRAM**

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF November 2017 Work Program

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**NOVEMBER 2017 GEF WORK PROGRAM:  
COMMENTS FROM COUNCIL MEMBERS  
(REFERENCE: GEF/C.53)**

**BIODIVERSITY**

**1. Angola: Combating Illegal Wildlife Trade and Human Wildlife Conflict in Angola (UNDP) (GEF Financing: \$4,103,800) GEF ID = 9735**

✓ **France's Comments**

We support the project objective, aiming at combatting illegal wildlife trade and reducing human wildlife conflict. However, we would like to underline the following points:

- Communities involvement: Although communities are explicitly mentioned as key stakeholders (and, in fact, beneficiaries if reduced human-animal conflicts), their involvement in the programme could go further. For instance, they could be more involved in the monitoring and control: as in other countries, joint patrols could be organised, with both staff from the administration, and community rangers.
- Capacity building: taking stock of other project experiences, it could be relevant to organise joint training and capacity building sessions, on Human-Wildlife conflicts, and on patrolling, addressed in the same time to public administration participants, as well as NGO and community.
- Monitoring and tracking illegal activities on the spot could also draw lessons from smartphone applications as developed by CIRAD
- Toolkit for human-animal conflicts: again, CIRAD has developed a toolkit with FAO successfully tested in central and southern Africa, including Angola that could be used (or, at least, proceed to an evaluation of successes and failure of the systems).

**Opinion:** favourable, but capitalisation and lessons drawn from other experiences in Africa should be taken into account where possible.

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Despite the revision, the outputs under component 1 still seem highly ambitious considering the budget. Germany suggests reviewing them, further reducing the

scope of component 1 or increasing the allocated budget for this component.

- For Output 1.1.1 Germany suggests using existing methods, e.g. from The International Consortium on Combating Wildlife Crime's (ICWC) Wildlife and Forest Crime Analytic Toolkit.

## **2. Bangladesh: Implementing Ecosystem-based Management in Ecologically Critical Areas in Bangladesh (UNDP) (GEF Financing: \$3,046,347) GEF ID = 9913**

### ✓ Germany's Comments

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The proposed project aims at developing, institutionalising and implementing management plans (including sustainable financing mechanisms, livelihood support, EHI monitoring system and compliance monitoring) for 3 pilot ECAs. This appears overly ambitious given the project timeframe and budget. At the moment, ECA is rather a concept that mainly exists *de jure* under DoE and has not yet been fully institutionalized at local level. Germany suggests further focussing available resources to reduce the risk of over-ambitiousness. Germany regards the following fields of intervention as most important: coordination, sustainable financing as well as strengthening institutional and technical capacities of relevant actors including ECA structures (see bullet point below).
- The selected three pilot sites are currently in different stages of putting the ECA approach into practice. Considering the ECA approach in general and the newly proposed / designated ECAs in particular, institutional development geared towards the establishment of ECA structures and mechanisms, including policy framing and clarification of roles and responsibilities, are needed before built-on interventions can be taken on board. Germany requests that the project specifies how this will be done through the proposed intervention at site level.
- ECAs are multi-stakeholder landscapes. Although DoE holds the official mandate for ECAs, management and planning issues of the areas cannot be addressed through DoE alone. This includes land use planning. Even though roles for the different line ministries have been outlined in the proposal, Germany suggest clarifying how the ministries will be concretely involved on the ground and what their interest would be.
- The project includes Cox's Bazar-Teknaf Peninsula ECA as one of the pilot sites. This site also constitutes a protected area (Teknaf Wildlife Sanctuary) that according to national legislation follows a co-management approach. Germany would like to emphasise that coordination with the existing community based and participatory structures is vital. Duplication and the establishment of parallel structures should be avoided. Germany therefore requests to elaborate on the

envisioned coordination mechanism with the co-management structures in Teknaf.

✓ *United States' Comments*

- There are risks to this project, especially if the government is not able to provide adequate resources or capacity—the proposal accounts for this risk and could provide more details.

**3. Colombia: Sustainable Low Carbon Development in Colombia's Orinoquia Region (World Bank) (GEF Financing: \$5,936,073) GEF ID = 9578**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany welcomes the reference to a number of national policies. However, the proposal would benefit if it clearly identified how the project contributes to the GEF Biodiversity Framework.
- It is mentioned that the project will develop capacities at the regional and local level and outreach to civil society groups during implementation. It would be beneficial for the PIF to list possible CSOs, as well as elaborate on building the capacity given the high staff turnover in Colombian institutions.
- The PIF makes reference to the peace building process but does not mention the newly established agencies (*Agencia de Desarrollo Rural, Agencia Nacional de Tierra, Agencia para la Renovación del Territorio*) and planning processes (particularly the *Programas de Desarrollo con Enfoque Territorial*) which will play a vital role for future land use planning. Germany suggests the Project concept should be adapted to these new post-conflict conditions and opportunities.
- Germany also suggests that during implementation the Humboldt Institute, PNN, the new A-Agencies and the Regional Environmental Authorities (CARs) should be considered as implementing partners.
- In addition, Germany suggests considering ongoing development programs that show overlap with the proposed project. This should include transparent criteria to determine geographic location and activities of the proposed project in order to avoid duplication of efforts and create synergies where possible:
  - “Environmentally oriented regional planning in conflict-affected areas (AmPaz)” implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and its counterparts on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ)
  - “NDC Policy Program” to be implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and its counterparts on behalf of

the German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB)

- “Protecting ecosystem services through their Integration in Regional Development Strategies in the Orinoquia” to be implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and its counterparts on behalf of the German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB)
- “Protection of forests and the climate/REDD+” implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and its counterparts on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ)

✓ Norway’s Comments

- The project area where the project will be implemented (the Orinoquia region - four departments: Arauca, Casanare, Meta and Vichada) has been considered as the final agricultural frontier in Colombia. We are of the opinion that the Sustainable Low-Carbon Development Project will face many risks and challenges. We recommend developing a mitigation risk section to reduce the risks and also wonder whether there is an overall plan for how to operate in high risk / high conflict areas.
- It is positive to see that the program will be implemented in a region that really requires investments together with low carbon and sustainability criteria. The project requires a cross sectorial cooperation between core ministries and a central NGO (WWF) in Colombia as: as Ministry of Agriculture and Rural Development (MADR), Ministry of Environment and Sustainable Development (MADS), National Planning Department (DNP) and we believe that this is a strong asset of the project.
- We also wonder whether the project is aligned with Colombia’s REDD+ strategy and Colombia’s Low Deforestation Development Vision for the Amazon. The Colombia Low Deforestation Development Vision for the Amazon lays out the strategy for how Colombia can achieve the goal of zero net deforestation in the Amazon by 2020. The links between the Project to be implemented and Colombia’s REDD+ strategy and Colombia’s Low Deforestation Development Vision for the Amazon could have been described in the Project Document. The project should also make sure not to duplicate work already supporting REDD+ implementation in Colombia and partially funded by Norway through the Norwegian International Climate and Forest Initiative.
- The Project Document could provide more information on how gender considerations will be handled in the project.

**4. Congo DR: Promoting the Effective Management of Salonga National Park through Creation of Community Forests and Improving the Well-being of Local Communities (UNEP) (GEF Financing: \$5,694,749) GEF ID = 9802**

✓ **Germany's Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The full proposal should specify a strategy for formal recognition of customary rights under modern law vis-à-vis land and resource use rights. The proposal would further gain from a more specific approach on formalization of land tenure aspects and on the process governance.
- It is recommended to examine the option of making signature of the “Ocapi” – Fund a conditionality for this project to be signed.

✓ **Norway's Comments**

- The independent evaluation (STAP) gives the project a good rating, but points out some important issues to be improved regarding the project design.
- The GEF secretariat “PIF” review gives the project a low rating, partly due to its lack of activities in the actual park, and the apparent lack of coordination with National Park implementing agencies.
- However, given the detailed analysis in the project document regarding the history of conflict between local people and park implementers, including the expulsion of local people, the focus on restoring sustainable livelihoods activities in the corridor where the people have been relocated to, seems reasonable and important.
- The analysis of actors and baseline projects in the area could also refer to CAFI, the FONAREDD and CAFI-funded integrated REDD+ programs to be implemented in Mai Ndombe, Orientale and Equateur Provinces.

✓ **United Kingdom's Comments**

- For the projects proposed in DRC, the UK is keen to understand what safeguards are in place.
- We are also keen to see more detail on how the investments line up with other investments in DRC, for example from the FIPS, Carbon Fund, FCPF and CAFI funding.

**5. Ecuador: Safeguarding Biodiversity in the Galapagos Islands by Enhancing Biosecurity and Creating the Enabling Environment for the Restoration of Galapagos Island Ecosystems. (CI) (GEF Financing: \$3,301,472) GEF ID = 9282**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following*

*comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The full proposal should clearly identify how the sustainability of the introduced measures, especially in the component 2 and 3, can be guaranteed. Therefore, Germany suggests elaborating in more detail on the institutionalization of the new social infrastructure and reestablishment of keystone species as well as on the role of local institutions and population in the project's exit-strategy.

**6. Lesotho: Promoting Conservation, Sustainable Utilization and Fair and Equitable Benefit-sharing from Lesotho's Medicinal and Ornamental Plants for Improved livelihoods (UNDP) (GEF Financing: \$2,913,699) GEF ID = 9799**

✓ *Germany's Comments*

- Germany approves this project.

**7. Madagascar: Conservation and Sustainable Use of Biological Diversity in the Northwestern Landscape (Boeny region) - Madagascar (CI) (GEF Financing: \$6,817,431) GEF ID = 9606**

✓ *Germany's Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The implementing agency Conservation International (CI) is not involved in management of any of the protected areas to be supported. The managers of the Protected Areas (PA) (MNP, Durrelle, ASITY, Antrema) are not mentioned as implementing partners in the proposal. The final project proposal should clarify their role and demonstrate the role and contribution by the implementing agency CI.
- The selection of the communes to be supported in developing their communal management schemes (SAC) is not clear. Of the 5 proposed communalities 1 (Katsepy) already has a validated SAC and in 2 (Soalala and Boanary) SAC development is ongoing. It should be explained how the project will work with these already developed SACs.
- Besides support from the General Directorate for the Environment, Madagascar Biodiversity Fund (FAPBM), which is partially funded by the German government through KfW, three of the PAs to be supported by the project already receive funding from the German Government (BMZ) through KfW (Ankarafantsika), NABU (CMK) and GIZ (CMK and Antrema). Against the background that there are many PA in Madagascar with much less or almost completely without funding

“insufficient funding” as a reason for selecting those PA, as stated in the proposal, should be critically reviewed and explained in the final project proposal.

- Communes/Mayors need to be included into the table of implementing partners.
- The project needs to be extremely well coordinated with all development partners and Malagasy stakeholders that are mentioned in the project outline as all of them are working in the same areas and with more or less the same implementation partners.

✓ **Japan’s Comments**

- As it is mentioned in the PIF, biological diversity in many areas in Madagascar has been threatened due to insufficient management related to lack of resources including finance. Therefore, the project design is suitable to aiming at sustainable and long-term management of biological diversity in the target areas.
- In addition, since there are some other organizations providing conservation and/or natural resource management related projects in other areas in the country, collaboration and good communication may help the project to be succeed.

**8. Maldives: Enhancing National Development through Environmentally Resilient Islands (ENDhERI) (UNEP) (GEF Financing: \$3,532,968) GEF ID = 9668**

✓ **Germany’s Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- Germany asks to take the STAP comments fully into account in the preparation of the final proposal.

**9. Mexico: Mainstreaming Biodiversity Conservation Criteria in Mexico’s Tourism Sector with Emphasis on Biodiversity-rich Coastal Ecosystems (UNDP) (GEF Financing: \$7,238,613) GEF ID = 9613**

✓ **Germany’s Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The Strategy for Biodiversity Mainstreaming the Tourism Sector (2016-2022) (SBMT) by Secretaria de Turismo (SECTUR) should serve as the key guiding document for this GEF project since it contains key elements of the planned project: planning, regulation and promotion instruments, Government budget, implementation steps and participation of diverse stakeholders.

- Germany suggests to align project planning and execution according to the Convention on Biological Diversity (CBD) Aichi Biodiversity Targets, especially Strategic Goal A: “Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society”. Germany strongly supports integration and mainstreaming of biodiversity into other policy fields.
- Germany suggests building as far as possible on ongoing initiatives in Mexico, one example of which would be the project: “Ecosystems- based Adaptation (EbA) for the Tourism Sector (ADAPTUR)” funded by the German government through the International Climate Initiative.

**10. Micronesia: Safeguarding Biodiversity from Invasive Alien Species in the Federated States of Micronesia (UNDP) (GEF Financing: \$4,141,509) GEF ID = 9917**

✓ **Germany’s Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- Germany welcomes the PIF. It demonstrates strong linkages with existing systems and cross agency participation, certificate trainings, civil society involvement (as some levels) and reaching fair and sound cost sharing with private sector. However, we suggest addressing the following matters in further detail as part of the full project proposal:
  - How ballast water management controls will be enacted, and not just legislated (as presented in the PIF).
  - How marine biosecurity monitoring would systematically occur, for example, in water at each port, or via some other field methodology.
  - How the government will resource core field monitoring and extension services, which is critical, if resourcing via fees/charges is insufficient.
  - Involvement of the Ministry of Education. The full plan should go beyond a ‘Communications Plan’ and consider specific curriculum innovations and resources, which build intergenerational awareness and compliance with biosecurity measures across society.
  - Certificate qualifications are an excellent proposal. However, the full project should scope how certificate qualifications can be either further developed into sustainable, institutionalised annual skills reinforcement trainings in government operational plans, or supplemented by other mechanisms such as staff swapping, partnership or long term mentoring programmes with other biosecurity regimes. This would increase the sustainability of impact of the proposed project and reduce on capacities.

**11. South Sudan: Capacity Development in Reducing Illegal Wildlife Trade and Improving Protected Area Management Effectiveness in South Sudan (UNEP) (GEF Financing: \$5,329,452) GEF ID = 9551**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Include indicators in the project proposal in order to show how project implementation will be monitored and evaluated.
- Some outcomes are rather formulated as output (e.g. 2.2). Germany suggests rephrasing these.

✓ **United Kingdom's Comments**

- We understand that the Ministry of Wildlife Conservation and Tourism is an executing agency for this project. The UK has concerns about South Sudan's governance capacity and, therefore, does not support funding through government agencies. Could GEF Secretariat confirm that the project can be achieved without using government agencies?

**12. Uganda: Institutional Capacity Strengthening for Implementation of the Nagoya Protocol on Access to Genetic Resources and Benefit Sharing in Uganda (UNEP) (GEF Financing: \$2,560,842) GEF ID = 9481**

✓ **Germany's Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The PIF mentions co-financing and respective activities by the Access and benefit-sharing (ABS) Capacity Development Initiative, hosted by the German Federal Ministry for Economic Cooperation and Development and implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, e.g. on pp. 4, 9, and 15. It has to be noted that the current project of the ABS Initiative ends in March 2018. No new financial commitments to the ABS Initiative in general have been made until now. Hence, a decision to work together with Uganda in a next project by the Steering Committee of the ABS Initiative is not to be expected before the GEF Council Meeting. Germany therefore requests, that reference to co-financing by the ABS Initiative can only be included in the final project proposal after the necessary budgetary decisions have been taken and in close consultation with the ABS Initiative.

✓ **United States' Comments**

- The global environmental benefits that will result from this project are not clearly explained in the PIF. The primary benefit is community involvement in ABS using collaborative forest management on existing conservation areas, but this is not clearly stated.
- There is risk of local community exploitation once traditional knowledge and taxonomy is documented regarding genetic resources in the area. The project should work to mitigate this risk.

**13. Vanuatu: Expanding Conservation Areas Reach and Effectiveness(ECARE) in Vanuatu (IUCN) (GEF Financing: \$2,450,459) GEF ID = 9847**

✓ **Germany's Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- review output 1.1.1-1.1.3. Output 1.1.3. "Management effectiveness assessments" should precede and inform outputs 1.1.1 and 1.1.2.
- Section 5 describes coordination challenges under the given capacity of government and mentions options. We suggest to specify these in the final proposal, including the strengthening of the Government's capacity, e.g. through seconded staff.
- Furthermore, we suggest reviewing the description of the allocation of resources to the different components. While the project is well aligned with the Focal Area Strategies, the allocation of resources is inconsistent and should be adjusted or made more transparent; Table A, e.g. describes the largest amount of resource dedicated to BD-1 Program 1, while Table B assigns the largest amount of resources to component 3, which corresponds to BD-1 Program 2.

In addition, Germany requests to review the proposal with regard to the following two issues:

- For successful implementation, it is crucial to coordinate the planned outputs and activities with previous and ongoing efforts, in order not to duplicate work or conflict with established national processes; e.g. output 3.1.1 and partly 3.1.2 have been addressed already by a currently ongoing project funded by the German government, jointly implemented by IUCN and GIZ. Along the same lines, output 1.1.1 should be well aligned with existing previous efforts.
- While section 2 and 5 describe five other projects including options for coordination with them, the expected in-kind contribution of these projects (of a total USD 2,095,000) should be outlined in more detail, to give a realistic assessment of the certainty of this co-financing. Along the same lines a more

specific outline of the planned contributions by ministries and provincial governments would be beneficial.

## CHEMICALS AND WASTE

### **14. Regional (Burkina Faso, Benin, Mali, Niger, Senegal, Togo): Impact Investment and Capacity Building in Support of Sustainable Waste Management to Reduce Emissions of Unintentional POPs (UPOPs) and Mercury in West Africa (BOAD) (GEF Financing: \$15,924,771) GEF ID = 9371**

#### ✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

This is an ambitious project design. However, it could still benefit from minor improvements, in particular with regard to a more rigorous utilization of state-of-the-art scientific knowledge and best available technologies (BAT).

Suggestions for improvements to be made during the drafting of the final project proposal:

- Project component 1: Establishment of regional capacity to promote sustainable waste management and share experience among partners, Output 1.1. and 1.2.:
  - Given the level of ambition, complexity and size of the project design, Germany suggests the development and adoption of a clear monitoring and evaluation framework for this project. While the project design foresees solid knowledge-sharing mechanism, it lacks a convincing Monitoring & Evaluation (M&E) framework.
  - Additionally, with respect to the inclusion of regional experience, Germany suggests that the regional secretariat may collaborate and exchange knowledge with an on-going BMZ-founded E-Waste programme in Ghana exploring the “Recycling and Disposal of Waste of electrical equipment in an environmentally sound way”.
- Project component 4: Output 4.2. Support for the efficient construction of solid waste treatment and recycling facilities, Output 4.5.2. (Recovery of biogas as electric power or flaring):
  - With regard to some outcomes/outputs, the project design lacks a rigorous utilization and/or understanding of context and country-specific best available technologies and recycling options. On example includes “flaring of landfill gas”, which is not a sustainable practice. Germany supports (in line with a STAP recommendation) for output 4.5.2. a clear roadmap or guidance for the reuse of landfill gas based on best available technologies/practices.

✓ *Japan's Comments*

- The Global Mercury Waste Assessment published by UNEP-IETC highlights that the gap between the provision in the Minamata Convention and current mercury waste management practice is wide. For many countries, the fundamental challenge is waste management itself. In this context, the project proposes integrated approach to address sustainable waste management including mercury waste. This approach goes along with the finding of the UNEP-IETC report. For the GEF secretariat, the review sheet in the database needs to be updated as it does not include the 'agency response'.

✓ *Norway's Comments*

- This region faces substantial environmental challenges including POPs and mercury, and capacity to deal with these challenges is limited. The project will help towards goals of both the Stockholm and Minamata Conventions, and we therefore generally welcome it. In addition, we would like to provide a few comments on how this project relates to waste management issues more generally – with a focus on marine littering and microplastics – and therefore will provide important co-benefits that should also be monitored.
- It is widely recognized, recently at UNEA 3 in a resolution put forward by Norway, that the rapidly increasing levels of plastic litter and microplastics in our oceans is a global concern of humankind and that sound waste management is the most important preventive action, and that this is especially important in geographical areas with the largest sources of marine plastic litter.
- This project will, through the development of sustainable waste management, contribute to the reduction of marine litter and microplastics (in addition to POPs and mercury) in an area with growing economies and poor waste management, and thus contribute to sustainable development goal 14.1.
- It should be noted that poorly managed land fill sites, in addition to posing a health risk and a source of pollution, is an important source of plastic litter to the marine environment.
- It should also be noted that all actions to reduce, collect, and adequately manage plastic waste, will contribute to the reduction of marine litter and microplastics - in line with UNEA 3 resolution on marine litter and microplastics, which encourage member states to " include where appropriate, marine litter and microplastics in regional, national and local waste management plans and in wastewater treatment"
- In the monitoring of the project, as well as in later evaluation, the project's contribution to the reduction of marine litter and microplastics should be included.

**15. Regional (*Kyrgyz Republic, Tajikistan*): Demonstration of Non-thermal Treatment of DDT Wastes in Central Asia (UNEP) (GEF Financing: \$15,120,000) GEF ID = 9421**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- This is a straightforward designed project addressing dichlorodiphenyltrichloroethane (DDT) waste disposal. Germany suggests the uptake of the STAP recommendations, especially on developing a contingency plan for an alternative remedial option in case the chosen Supercritical Water Oxidation (SWO) technology does not provide the expected results during the trial stage.

✓ **United States' Comments**

- Based on our reading of the PIF, the EIA (or other national statutory analysis) has not been completed and approved by the national environmental authorities as mandated by national legislation. Is this correct? Please explain how the project will ensure all legal requirements are fulfilled before moving forward.
- Before CEO endorsement, please include information on any alternatives analyses, impacts assessments, cost benefit analyses, and how such assessments helped shape the path of the project. Please also demonstrate how environmental and mitigation monitoring plans will be implemented, this information was either not in the PIF or not clearly explained.
- Can you provide objective evidence or at least additional sampling results that support estimates of DDT amounts to be treated (errors could result in significant cost overruns)?
- Prior to CEO endorsement, please provide maps for reviewers to locate the proposed three sites. This information will contribute to an understanding of potential environmental, social, biodiversity, and trans-boundary impacts.
- Public consultations should be conducted, as required by national legislation and obligations under the Aarhus conventions ratified by both countries, and detailed as part of the project development. Does the project team have plans to do so? And if not, please ensure this is a part of the next project proposal.
- Can you provide a reference to KG 2006 POPs NIP under the Stockholm Convention and evidence that it has been completed?
- Can you provide references that indicate that the SCWO technology has been successfully used on a commercial scale? This would be helpful for us from a review and general knowledge perspective.

**16. Brazil: Environmentally Sound Management (ESM) Of Lindane In Brazil (UNEP) (GEF Financing: \$11,000,000) GEF ID = 9412**

✓ **Germany's Comments**

- Germany approves this project.

- This is a clear and well-designed project. No further comments/remarks.

✓ **United States' Comments**

- We are quite interested to see if mobile methods can be successfully developed to effectively remediate persistent organic pollutants such as lindane and would greatly appreciate information about these methods as the project is implemented.
- Environmentally sound management of Lindane is a pressing issue in many less developed countries, we encourage the Implementing Agency to think of ways to expand or build off of their work in Brazil to help other countries manage these risks.

**17. Cote d'Ivoire: Sound Management of Unintentional Persistent Organic Pollutants (POPs) and Polychlorinated Biphenyl Ether (PBDEs) to Reduce their Emission from the Industrial Waste Sector (UNIDO) (GEF Financing: \$5,325,000) GEF ID = 9263**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Project component 1: Legal framework and institutional capacities, Project outcome 1: Legal and institutional framework revised
  - While not a prerequisite, Germany suggests to extent the focus of activities on import policies and include further components reviewing and advising on extended import restrictions and regulations regarding e-waste and end-of-life vehicles.
- Project component 4: Monitoring and evaluation, Output 4.2. Project results evaluated
  - The unsustainable release of chemicals due to lack of proper management and disposal, e.g. of e-waste, is a serious and widespread problem in the region. The project has an ambitious design and offers good regional learning potential. As it currently lacks knowledge-sharing regional components, Germany supports the further inclusion of regional knowledge-sharing components.
  - With respect to existing experience in the region, Germany suggests that the project coordinators may exchange knowledge and experiences with an on-going BMZ-funded E-Waste programme in Ghana exploring the "Recycling and Disposal of Waste of electrical equipment in an environmentally sound way".

**18. Kazakhstan: HCFC Phase-out in Kazakhstan through Promotion of Zero ODS Low GWP Energy Efficient Technologies (UNDP) (GEF Financing: \$4,586,200) GEF ID = 9788**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Baseline data suggests that meeting Kazakhstan's obligations under the Montreal Protocol will be challenging, thus ongoing and comprehensive project management analysis (assess and monitor progress during implementation) at Project Preparation Grant (PPG) stage is advised.
- A coordination/steering framework should be put into place, to make sure that all relevant stakeholders are engaged from the onset of the project.
- There are two conflicting statements regarding the envisaged reduction of ozone depletion potential (ODP) tons by 2020. On page 7 the reduction is stated to be 12,78 ODP tons, whereas on page 13 it is stated to be 39.3 ODP tons, this discrepancy should be clarified.
- The climate benefits of this project should be reflected in the overall expected global environmental benefits.

✓ *United States' Comments*

- Could the project team let us know whether this project aims to support Kazakhstan to comply with the 2020 and 2030 HCFC reduction targets under the Montreal Protocol, or comply with the new plan action approved by the Parties at their 28<sup>th</sup> Meeting in 2017?
- It is unusual for a country not to have any consumption of HCFCs in air conditioning. For this reason, this data point in the PIF should be verified. If there is HCFC consumption in air conditioning, even at relatively low levels, it would be critical to include the sector in the project.
- The total funding requested from the GEF appears excessive relative to the quantity of HCFC consumption that needs to be phased out, approximately 3 times what a developing country would receive to phase out a similar quantity of HCFCs under the Multilateral Fund. While it is not unusual for the GEF to provide a higher level of funding than the Multilateral Fund, a justification for the level of funding in this project is needed prior to CEO endorsement.
- The next iteration of the project document should clarify that Kazakhstan will sustain zero consumption of methyl bromide in the future in line with its obligation under the Montreal Protocol.

**19. South Africa: Environmentally Sound Management and Disposal of PolyChlorinated Biphenyls(PCBS) in the Republic of South Africa (DBSA) (GEF Financing: \$8,242,500) GEF ID = 9576**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- General Suggestions:
  - Systematic investment mechanisms to ensure long-term support on the environmentally sound management of PCB should be taken in to consideration in the project proposal.
- Component 1: Institutional Capacity Building and Awareness Raising
  - Mechanisms to prevent sales of contaminated equipment within the country should be put into place and incorporated into institutional capacity building and awareness raising.
- Component 2: Final Treatment and disposal of PCB contaminated oils and waters
  - Germany suggests specifying the parameters for the destruction efficiency of technologies used for final treatment and disposal. Upgrade of existing technology should make sure that environmental standards are met (incineration at very high temperatures to limit emissions to a minimum etc.; see STAP p.2, paragraph 6). Furthermore, the treatment/disposal of 2.500 tons of PCB contaminated oils and equipment should be further defined, weight measures between oils and equipment might be quite different which leads to a varying degree of environmental benefits.

✓ **Norway's Comments**

- The project addresses an important issue, namely remaining stockpiles of substances basically regulated under the Stockholm Convention years ago. During the last governing body meeting this issue figured strongly in the debate, it was not common knowledge that the problem was that serious. We very much welcome this pilot program.

## **CLIMATE CHNAGE**

### **20. Angola: Promoting Sustainable Energy Access for Rural Communities in South-Eastern Angola (UNDP) (GEF Financing: \$3,540,468) GEF ID = 9810**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposal on promoting sustainable energy access for rural

communities in South-Eastern Angola. Energy poverty is a challenge of high significance within the context of sub-Saharan Africa, especially in rural areas (e.g. in Angola, 8 out of 10 households in rural areas live in energy poverty). Addressing this challenge does not only serve the purpose of strengthening socio-economic development, but also carries the potential of major benefits in terms of climate change mitigation, including the protection of forests as carbon sinks, through the promotion of renewable energy (RE) solutions (micro-hydro, solar PV mini-grids, solar home systems, solar lanterns). The approach taken by this project seems promising, as it takes into consideration questions of energy generation, technology distribution and maintenance (e.g. private sector cooperation), capacity building needs (e.g. training provided to technicians), financing options (e.g. mobile payment programme) and energy end-use efficiency (e.g. advanced cook stoves).

Suggestions for improvements to be made during the drafting of the final project proposal:

- Identified RE solutions and maintenance services need to be affordable for rural communities and households or shall be connected to payment schemes reflecting the economic situation of local inhabitants. Regarding the introduction of advanced cook stoves, the choice should also fall onto sustainable solutions, also taking into consideration potential cost for users beyond the lifespan of the project.
- Finally, manufacturing of the low-carbon technologies has not yet been specified. Germany suggests considering the promotion of local production, with regards to additional socio-economic benefits.

✓ *United States' Comments*

- The proposal somewhat articulates how the project/program will be sustained after the GEF grant is used up. It assumes that it is a government priority to ensure on- and off-grid rural electrification, and so that if the project is successful, demand will increase and project could become self-sustaining. It does not address sustaining of existing project resources through and past lifecycle of distributed products (lanterns, stoves).

**21. Bangladesh: Promoting Low Carbon Urban Development in Bangladesh (UNDP)  
(GEF Financing: \$3,767,810) GEF ID = 9368**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the project proposal to assist Bangladesh's burgeoning cities in their pursuit of low-carbon solutions in the face of extremely rapid urbanization. The proposal is thorough in describing the country context and problem of unsustainable resource usage in an urban context. A wide range of stakeholders and significant co-

financing have been identified. The potential for up-scaling project activities is also great.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Notably absent from the project description is any mention of how progress will be monitored. On the one hand, the project will need systems for keeping track of the global environmental benefits. On the other hand, systems will need to be established for monitoring progress, including co-benefits related to human development, on each of the components described in the PIF. Germany encourages careful consideration of how the project will measure its success as it moves into the Project Preparation Grant (PPG) stage.

## **22. Chile: Supporting the Chilean Low Emissions Transport Strategy CLETS (CAF) (GEF Financing: \$2,900,000) GEF ID = 9742**

### ✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the project proposal to support Chile in a transformational shift towards low-emission urban mobility systems. The proposal targets a high-emitting sector with plans to move public transport systems in Chile's largest cities toward zero-emission or low-emission transport modes. The idea proposed has been developed in a participatory manner, vetted by numerous technical experts and has the support of key stakeholders. GEF funds are earmarked for key activities related to policy advice, MRV and knowledge generation and sharing. The co-financing for technical aspects is significant and key barriers and risks are being addressed, resulting in a low risk profile for the project.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Please note that it is difficult to read parts of the proposal as it is a scanned document, and the graphs and tables are, in part, illegible. Plus, the PIF seems to assume that the reader has previous knowledge of Transantiago's operations. For the final project preparation phase, these issues should be resolved so that all technical aspects, as well as relevant historical experiences and contexts are clear.

### ✓ United States' Comments

- We recommend revising the PIF to include information regarding private sector financing; consideration and inclusion of other ministries and private sector entities in stakeholder collaboration; better delineation of risk mitigation strategies; and clearer linkages between startup, sustainability, and broader scale up. On the latter, potential is mentioned yet how it will occur is not very well-delineated.
- The proposal identifies some risks, yet does not yet delineate mitigation strategies for most of them. This holistic, ambitious project delineates barriers and a large

number of outputs, and it is somewhat unclear how financial and regulatory risks would be overcome, especially as they may or may not require new legislation.

- Implementation risk appears to be high (not medium) and commercial risk to be medium (not low) due to 1/3 of expected costs' lacking financing.
- The regulatory framework barrier is significant. The environment is not conducive to innovation re: data access, interoperability. How will the project address this hurdle?

**23. China: China Distributed Renewable Energy Scale-up Project (World Bank) (GEF Financing: \$7,278,600) GEF ID = 9749**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposed project that will support China in the development of distributed renewable energy policies and pilots promoting multiple-technology combinations. The project is consistent with China's Country Partnership Strategy (CPS) providing a sectoral dialogue on "supporting greener growth, in particular, shifting to a sustainable energy path". Germany acknowledges that the project will support China's NDC and complements the China Renewable Energy Scale-Up (CRESP) Phase II project, a long-term strategic partnership between the Government of China and the World Bank/GEF.

Suggestions for improvements to be made during the drafting of the final project proposal:

- The project combines in two components policy development and piloting of business / financial models. The first is to support new policy development which will facilitate the investment, development, and implementation of grid access and connection, standards, and urban planning. The second is to pilot scalable business and financing models and applications in select cities that will spur distributed RE scaling-up. The final project proposal should in more detail describe the necessary policies to relieve the existing barriers and already outline potential business / financial models.
- The final project proposal should present an estimated market potential for distributed renewable energies and the potential emission reduction estimation.
- The proposal should clarify more on the envisaged technical specifications of the pilots, i.e. the design and implementation of the proof-of-concepts pilots.

✓ *United States' Comments*

- This project needs major revision, particularly on stakeholder engagement.
- The project/program takes into account potential risks and provides sufficient risk

mitigation measures, although the mitigation approach for #27 implies that projects with greater overall potential benefits would not be competitive without stringent policy reform. This presents an opportunity for reserving funding at the latter end of the project (if project time/lifecycle permits) in order to offer competitive selection of a higher-benefit project should such reforms be implemented within the project cycle time.

**24. Congo DR: Promotion of Waste to Energy Options for Sustainable Urban Management in the Democratic Republic of the Congo (UNIDO) (GEF Financing: \$3,959,589) GEF ID = 9683**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposal to generate energy from waste while improving environmental quality and making the best possible use of waste resources. The proposal is well presented and coherent with GEF funds being earmarked for relevant work on policy frameworks, demonstration projects, awareness raising and monitoring efforts.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Regarding activity 3.1.3 under outcome 3.1 on the biomethanisation of organic wastes, the PIF states that an estimated 10% of the municipal solid waste being landfilled is organic waste that could be used for methane-capture, if separated. Table 2 lists garden and park waste as making up 40% of the total municipal solid waste — this in addition to 9% from food wastes. That would result in almost 50% of the municipal solid waste being comprised of organic waste that could potentially be used for biomethanisation. It would be helpful if during the Project Preparation Grant phase it could be clarified why the yard waste is not considered as an input for the biomethanisation process but rather will be used for combustion.

✓ **United Kingdom's Comments**

- For the projects proposed in DRC, the UK is keen to understand what safeguards are in place.
- We are also keen to see more detail on how the investments line up with other investments in DRC, for example from the FIPS, Carbon Fund, FCPF and CAFI funding.

✓ **United States' Comments**

- We are concerned there may be significant barriers to large populations adopting new waste management protocols, though this may not be an insurmountable challenge given the thought and effort put into stakeholder outreach.

- Related initiatives are not well articulated in the PIF; rather, the project builds off existing landfill and MSW collection and other infrastructure. We encourage the project team to expand their scope of potential related initiatives to include other activities.

**25. Guinea-Bissau: Promoting Better Access to Modern Energy Services through Sustainable Mini-grids and Low-carbon Bioenergy Technologies Among Guinea-Bissau’s Forest-dependent Communities (UNDP) (GEF Financing: \$2,912,702) GEF ID = 9561**

✓ **Germany’s Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany welcomes the proposal to bring off-grid energy solutions to one of the world’s most underserved countries in terms of its energy access. The project will be operating in a difficult post-conflict, highly impoverished environment that presents significant risks to project success. Some of the risks should be more thoroughly addressed during the Project Preparation Grant (PPG) stage and as outlined below. Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Regarding risks (p.14), it is not clear what the level of risks are. The value assignments of P and I should be explained.
- Regarding the technology risk: it is stated the spare parts should ideally be produced locally, but this aspect of locally-manufactured systems and spare parts is not addressed in the PIF. Please elaborate on project plans to support a homegrown manufacturing industry in support of off-grid infrastructure.
- Regarding financial risk: the project could explore financing models like “Pay as you save” which enable users to take out loans, the payback of which, will be less than payments made for business-as-usual energy solutions (in this case diesel-powered generators). Given the current high cost of energy per kwh in the country, it should be financially feasible to present more cost-effective energy solutions with solar power, which is why a pay-as-you-save solution could be viable here.
- Regarding market risk: the PPG should aim to provide certainty that diesel subsidies will be phased out in the targeted regions in order to make solar mini-grids financially viable. Please explain how the “introduction of financially- and socially-viable tariffs for Renewable Energy-based mini-grids “can level the playing field to make renewables competitive with diesel alternatives.

**26. Kiribati: Promoting Outer Island Development through the Integrated Energy Roadmap (POIDIER) (UNDP) (GEF Financing: \$5,379,452) GEF ID = 9905**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposed project proposal that supports development of Kiribati's outer island through the achievement of nationally set renewable energy and energy efficiency targets. With GEF assistance for policy and financial de-risking, the proposed project will facilitate the application of appropriate technological, institutional and policy-oriented options that would enable the widespread application of Renewable Energy and Energy Efficiency technologies. As outlined in the proposal, there is the need for a comprehensive approach to subsume the so far limited and fragmented initiatives (mainly technical demonstration projects), which will fall short of reaching the set target for increasing the share of Renewable Energy.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Government of Kiribati (GoK) officially adopted targets for reductions in fossil fuel use by 2025 through enhanced renewable energy utilization and energy with a Renewable Energy application target of 23-40% for the main and outer islands. The project will support these targets and the NDC implementation. Germany encourages the proposal to formulate long-term targets towards 100% Renewable Energy covered under the Kiribati Integrated Energy Roadmap (KIER).
- The proposal lists in detail the existing barriers and how the project will address them. However, two main barriers are not yet sufficiently addressed in the project components: the lack of reliable data could be complemented with data on national renewable energy resource (mapping); and the so far weak local technical capacity could be encountered not only with institutional capacity development, but with educational and vocational training to ensure sustainable operation and maintenance through domestic technicians etc.
- The PIF states that the project will facilitate community-based, private-sector financed Renewable Energy-based electricity systems. However, a detailed description of the operation and business model is missing so far.

**27. Myanmar: Climate Change Mitigation through Methane Recovery and Reuse from Industrial Wastewater Treatment (UNIDO) (GEF Financing: \$3,984,589) GEF ID = 9830**

✓ *France's Comments*

- Very interesting project which deals with: (i) climate change as most of industrial waste water are untreated and release greenhouse gases (GHG) in the air (methane and nitrous oxide), (ii) local pollution as these waste waters render water resources unsuitable for downstream uses and leading to human diseases, (iii) potential renewable energy generation, (iv) in a country where structural barriers remain high

at all levels (policy, technology, capacity, awareness...).

- In the PIF it is not clear whether the GHG will be recovered through open ponds or closed anaerobic digester although we understand that the project would favor the second option. In selecting the industrial parks for demonstration projects, our recommendation would be to look for sites which would allow the implementation of the second option, as far as possible. Parameters for this choice are economic analysis (investment costs are higher for digester), technology availability and capability of local staff to operate the plants. The choice of the technology used is also important for nitrous oxide emissions (N<sub>2</sub>O) which have a strong and negative impact on the stratospheric ozone layer preservation.

**Opinion:** favorable, provided the above clarifications are provided in the final document.

✓ **Germany's Comments**

*Germany requests for the following project that the Secretariat sends draft final project documents for Council review four weeks prior to CEO endorsement:*

Germany welcomes the ambitious proposal on a comprehensive approach for industrial waste wastewater treatment in Myanmar. Myanmar has already established a comprehensive legislative framework in particular under the Environmental Conservation Law, but lacks particularly an adequate enforced monitoring system as well as regulatory framework. The project seeks to streamline and strengthen other existing policies. Germany would like to emphasize thereby to follow the user-pay and polluter-pay principles as well as to put waste minimization through the reduction, reuse and recycling of raw material, energy and water, in the focus of the project's capacity development and regulation activities.

Germany appreciates the envisaged application of UNIDO's Transfer of Environmentally Sound Technologies (TEST) that has been proven in other projects. In this regards the project is innovative as it applies a holistic approach when targeting effluents from industrial zones. Germany sees a substantial potential for scaling-up, since Myanmar currently has 24 industrial zones with almost 3,500 individual factories, as mentioned in the PIF.

Germany requests that the following points be taken into account during the drafting of the final project proposal:

- The log frame comprising the component, outcomes and outputs should be improved. In particular component 1 should be divided into three components, for example: 1) Enhancing wastewater regulatory framework; 2) Applying TEST integrated approach at industrial parks and companies; 3) Capacity development on industry wastewater treatment and methane recovery power generation technology. Output 1.1 should be more specified in relation to the specific output.
- The PIF states that the project will have both *direct* and *indirect* emission reductions of at 140,000 tons of CO<sub>2</sub>: "Direct CO<sub>2</sub> reduction achieved through increased resource efficiency and wastewater treatment in industries"; and "indirect CO<sub>2</sub> reduction will be accomplished via the use of the organic matter captured by

the wastewater treatment for the production of biogas”. Both activities, i.e. methane emission avoidance and methane capture and utilization are direct activities though. However, the replication factor of demonstration projects is estimated to 1.5 (indirect impact). The full proposal should more clearly present the expected direct emission reduction compared to indirect emission. In addition, the emission reduction calculation is not accurate, e.g. presenting wrong units for the grid emission factor.

- The PIF mentions a current Memorandum of Understanding (MoU) between UNIDO and the World Bank Group with regards to infrastructure investments in the targeted industrial zones in Myanmar. The final proposal should clarify what is covered by the MoU with regards to infrastructure investments in industrial zones and how this is related to the proposed project.

✓ Norway's Comments

- There is no doubt that such a project is important and particularly useful in this area where appropriate waste water treatment is often non-existent. There are certainly also co-benefits both for environment more generally and health.
- We cannot really assess how innovative this particular project is. In further project design and implementation of this and similar projects, one should also take into consideration lessons learnt from comparable projects in other countries including CDM projects.

✓ United States' Comments

- The concept of implementing wastewater treatment technologies through policy alignment and private sector involvement is obviously needed. However, the details of how this will be implemented are somewhat unclear. For example, it is not clear how this project would lead to more ‘sustainable land management’ for agriculture.
- The PIF does not explain what incentives will be in place to entice private industry to be involved and contribute financially to this project.
- There is a lack of focus on the long-term sustainability of this PIF. Reviewing existing policy mechanisms is a good start, but can be thwarted by lack of human capacity or resources in the government. We hope the project team will be able to mitigate or avoid such pitfalls.
- Because the ultimate goal of this project is waste reduction and technology implementation, it is not clear what the plans are for maintaining wastewater treatment technologies past the project time period.

**28. Myanmar: Myanmar Rural Renewable Energy Development Programme (UNDP) (GEF Financing: \$4,934,228) GEF ID = 9890**

✓ Germany's Comments

*Germany approves this project in the work program but asks that the following*

*comments are taken into account:*

Germany welcomes the proposed project proposal which aims at strengthening the enabling environment for renewable, rural electrification in Myanmar. There is a high need for coordination of several activities in Myanmar that the envisaged project addresses.

Suggestions for improvements to be made during the drafting of the final project proposal:

- It is not transparently described, how the private sector financial contribution (TBD, page 5) has been estimated and what conditions have to be fulfilled to enable these financial flows.
- With regard to monitoring, reporting and verification (MRV) of the projects' results, it might be helpful to consider the design and implementation of an MRV system in the context of the envisaged focal point or another suitable institution. This MRV system could provide relevant data for national processes such as the National Communication or NDC progress.
- The ongoing project "Promoting Rural Electrification in Myanmar", funded by the German Government, should be taken into account. While its focus is particularly on mini-grid solutions, core elements such as policy strategy development and regulations as well as capacity development might be redundant to the envisaged GEF activity. Also, both projects partner with the same Myanmar institutions, DRD and MOALI. Thus, it is recommended to envisage stronger coordination between these two activities.

✓ Norway's Comments

- The proposal is addressing relevant challenges and obstacles against renewable energy developments in Myanmar.
- The proposal is based on a large share of co-financing, seemingly non-confirmed. A main question is the completion of the project in case much less of the anticipated funding becomes available.
- Attempts to address mechanisms for building the "tariff-bridge" between (somewhat expensive) off-grid systems and over to the (cheaper subsidized) on-grid systems should be addressed, in order to mitigate investment risks in renewable off-grid installations. Even if the full grid expansion plan according to the NEP will take many years, the mere assumption/hope for the grid to arrive might be enough to diminish the interest of potential renewable energy investors, for financial risk reasons.
- We suggest clarifying project outputs, especially of components 1 and 3. Ensure that duplication of existing/similar activities is avoided.

✓ United States' Comments

- There would be a huge benefit from reducing GHG by moving entire rural village

electricity access to renewable energy; particularly since a recent study showed that 55% of rural villages use diesel generators at present. Unfortunately, the specific targeted reductions related to these activities were hard to decipher in the PIF. Some clarification on this would be helpful.

- Regarding the private sector involvement in this project, perhaps a Southeast Asian energy corporation or NGOs could be considered for inclusion.
- The proposal does not provide enough specificity regarding the project beneficiaries and where they are located in the country. Further, it does not discuss whether the rural areas have indigenous peoples, such as hill tribes, or if certain village populations are economically disadvantaged. Please provide this information prior to CEO endorsement.
- Of the total \$4.67 million grant, it appears that \$2.4 million will be dedicated to the assessment, design, and establishment of public-private partnerships to make operational of at least 15MW of renewable energy. The remainder of the investment manages upstream risks by concentrating on trainings and providing on the ground technical assistance. We are somewhat concerned that risk mitigation measures are not adequately discussed in the PIF and we request that clearly planned and scoped risk mitigation procedures are identified in the final project document.

**29. Nigeria: Improving Nigeria's Industrial Energy Performance and Resource Efficient Cleaner Production through Programmatic Approaches and the Promotion of Innovation in Clean Technology Solutions (UNIDO) (GEF Financing: \$3,898,265) GEF ID = 9714**

✓ *Germany's Comments*

- Germany approves this project.

**30. Nigeria: De-risking Sustainable Off-grid Lighting Solutions in Nigeria (UNDP) (GEF Financing: \$2,639,726) GEF ID = 9743**

✓ *Germany's Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The project proposes to address a significant problem (lack of access to sustainable electricity) in the context of significant barriers that present high risks to project success. The PIF does not go far enough in describing how the barriers will be overcome. In fact, some of the policy barriers should be overcome prior to beginning the project since, for example, in the absence of a governmental commitment to phasing out diesel subsidies for off-grid generators and lighting

purposes, the project will fail due to the inability of solar to compete with diesel. (The PIF itself recognizes this risk as a deal-breaker for project success.) Please confirm if this governmental commitment will indeed be achieved before the PPG stage.

- Other barriers that are described but not satisfactorily resolved include:
  - Lack of end-user credit information: how will the project address the barrier about lack of financial credit data availability regarding individual clients (end-users), which is required for the technology providers to engage with a Pay-As-You-Go (PAYG) system? What can the project do in concrete terms to support the “growth of the consumer credit industry”?
  - Telecom financial services: what will the project do in concrete terms to facilitate the payments within the PAYG system. If the mobile service providers cannot provide this financial service, how will payments happen in rural settings?

✓ **United States’ Comments**

- Our experts have significant concerns with this project since many of the essential policies, regulations, and financial services essential to success are not in place – or at least at the scale and in the locations, they are needed. The project acknowledges these challenges and notes that much of its efforts will focus on overcoming these constraints – but there is no discussion of how these risks will be overcome. What will the project team actually do to get the government to adopt policies it has not adopted to date (despite much scoping and planning)? How will the project team make the necessary financial services available in areas where they currently are not? This needs to be clearly articulated in the project document prior to CEO endorsement.
- While there are, no serious environmental concerns associated with the project, there are two critical economic concerns that pose barriers to project success and that the project team should take into account:
  - The poverty rate in rural Nigerian communities is high. Poor people tend to be extremely risk averse when offered new technologies at a cost because the penalty for making a bad investment is high. The proposed public awareness and demonstration sites could help overcome this.
  - The lack of Mobile Money Networks could seriously limit the effectiveness of a planned pay-go (PAYG) system of financing the new standalone electricity/lighting systems.
- We appreciate the project team’s response regarding the GEF’s value added, which was too often described vaguely in the PIF, making it difficult for our experts to identify what will actually be done on the ground with the GEF funds. We hope that such vague presentations of project activities are not repeated in the future, since it sets us back in our ability to adequately review GEF projects.
- The PIF identifies an impressive set of programs, organizations, and stakeholders that do related work in rural Nigeria and emphasizes which ones it will work

closely with. Additionally, the last half of page 18 discusses how the project will work with civil society, NGOs, gender equality, and women's empowerment. What exactly will this work entail? The explanation is quite vague and leads the reader to think that perhaps such aspects have not been thoroughly thought out.

- The project envisions facilitating the creation of a working market for renewable light and energy products. By definition, such a market would have a critical mass of willing buyers and sellers and so would likely be self-sustaining. The proposal needs to be much more convincing, however, that it can help create this working market.

### **31. Niue: Accelerating Renewable Energy and Energy Efficiency Applications in Niue (AREAN) (UNDP) (GEF Financing: \$3,321,563) GEF ID = 9752**

#### **✓ Germany's Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany appreciates the integrated approach that the project takes by addressing policy, institutional, financial, technological and information-related barriers that have been impacting the successful expansion of renewable energy (RE) sources within the local energy sector and the widespread application of energy efficiency (EE) measures. The project is well aligned with the local policy landscape and refers directly to the target of scaling up RE energy supply from 2 to 80 percent by 2025 that has been set out in the Niue Strategic Energy Road Map 2015 – 2025 and is reflected within the country's Nationally Determined Contributions (NDC).

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- As one of the major barriers to current efforts undertaken on RE expansion has been grid instability (343 kWp solar PV installed of which only 80 kWp is operational), Germany emphasizes to ensure that this component receives sufficient attention, as it is an important prerequisite for the widespread distribution of already installed and additional capacity.
- Taking note of the baseline projects (total investment around USD 16,600,000 USD) currently under implementation, Germany further encourages the intention to strengthen synergies with these projects, while at the same time focusing on complementary actions in the proposed GEF project (e.g. improving grid-performance, awareness raising and information dissemination about cost-effective EE and RE technology applications) instead of duplicating efforts undertaken by other actors active in the energy sector.
- As the implementing GEF Agency UNDP has already gained great experience on the topic of RE and EE within five projects in the Pacific region, Germany suggests to further outline how the information exchange network will be operationalized, what stakeholder will be having access to it and what specific topics will be addressed (e.g. policies and regulations, technical trainings, low-carbon

applications).

✓ **United States' Comments**

- Project costs for policy/planning/analysis deliverables seem somewhat high given Niue's very small size, and with what "pilot applications" the project entails is perhaps somewhat unclear.

**32. Solomon Islands: Stimulating Progress towards Improved Rural Electrification in the Solomons (SPIRES) (UNDP) (GEF Financing: \$2,639,726) GEF ID = 9787**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

Germany welcomes the proposed project proposal which aims at strengthening the enabling environment for renewable, rural electrification on the Solomon Islands. There is a high need for coordination of activities on the Solomons that the envisaged project addresses. Identified issues for consideration are:

- The estimation of direct and consequential GHG emission reductions lacks a detailed description of the applied methodology and underlying data.
- The description on page 4 highlights that there is no detailed information available on the full potential of renewable energies such as wind or solar PV on the Solomon Islands. Thus, it might be considered to include an assessment of this potential in component 3 of the project proposal.
- Germany suggests evaluating how the private sector can be incentivized properly to guarantee leverage of co-funding and a reliable implementation of technologies in the future. A transparent communication of the potential and levelized cost of electricity (LCOE) of renewables would be a helpful element (see comment above).
- In the context of knowledge management, it might be worth to consider a strengthening of the educational system for developing renewable energy related labour skills. Capacity building for the local colleges or universities including set-up or adjustment of study courses might be useful to sustain long-term implementation and operation of small-scale renewables.
- Germany suggests exploring and preparing options for financing incremental costs of renewable electrification after completion of the project. This can include both domestic and international climate finance sources.
- The PIF mentions on page 8, that there are other "energy projects in the country at various stages of implementation such as electrification projects of boarding schools, which follows the same scheme that were earlier implemented by GIZ and

funded by European Governments (Italy, Turkey).” The full proposal should further elaborate and clarify on the project’s relation to these activities.

**33. Trinidad and Tobago: Energy Efficiency through the Development of Low-carbon RAC Technologies in Trinidad and Tobago (UNDP) (GEF Financing: \$ 5,152,392) GEF ID = 9789**

✓ *Germany’s Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany welcomes the proposed project and appreciates its innovative character that has been proposed in similar project proposals recently (e.g. GEF Project ID = 9612 in Mauritius). The type of project is highly innovative as it addresses two international conventions (UNFCCC and Montreal Protocol) at the same time and combines energy efficiency and natural refrigerants paving the way towards climate and ozone layer friendly technology in the Refrigeration and Air Conditioning (RAC) sector. Through Multilateral Fund (MLF) funding, HCFC-22 will most likely be displaced by consumption of HFC refrigerants. The GEF project will support alternative approaches to displace HFCs with low Global Warming Potential (GWP) alternatives, including natural refrigerants.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The PIF in paragraph 30 states “there is no manufactures or assembly facilities for RAC equipment” in the country. However, paragraph 19 describes the market conditions and supply chain. The final project proposal should clarify on this.
- The project will make a significant change in the existing consumption of inefficient technologies for refrigeration and air conditioning, mostly in the commercial and residential sectors. As one of the main barrier identified are heavily subsidised energy prices (e.g. low electricity tariffs for industrial, residential and commercial customer). Average prices are much lower than in other Small Island Developing States (SIDS) and a major challenge to the promotion and implementation of energy efficiency programs. However, the project component does not address this essential barrier. Germany would like to encourage the project to consider energy price reform in the proposal or analyse ongoing activities in this regard in the final proposal.
- Electricity consumption for air conditioning and refrigeration equipment by sector is not officially available (paragraph 13) at the moment for Trinidad and Tobago. The final proposal should in detail describe how the expected emission reduction potential is derived by elaborating on current baseline and penetration data.
- The project will promote a series of pilot activities by scaling up baseline interventions co-funded by the Montreal Protocol mainly by the private sector, e.g. district cooling projects. For these activities feasibility studies will be completed. Germany would like to ask to also consider renewable energy technologies in these

studies, such as solar cooling system driving adsorption or absorption chillers.

✓ **United States' Comments**

- We generally support the objective of this project, and hope that with detailed reporting it could serve as an example for future collaboration between the GEF and the Multilateral Fund to maximize the climate benefits of the HFC phase-down.
- We strongly recommend that the project design include development of national minimum energy performance standards for the various categories of equipment in the RAC sector, including a clear plan for how to achieve adopting and implementation of the standards.
- The project proposal seems to predetermine the best low-GWP technology prematurely at this stage of project development. Technology neutrality is essential to an effective consideration of the best technology choice available at the time for a specific location. Absent neutrality, technology selection is biased, inhibiting innovation and potentially the sustainability of the project. The full project proposal should demonstrate full consideration of all available technologies that will produce and environmental benefit while maximizing the effectiveness and sustainability of the project. This consideration cannot be limited to only CO2 and hydrocarbons, but must give equal consideration to all potential low-GWP alternatives to HCFCs and HFCs.
- In light of the high level of funding envisaged for the technology interventions planned under Component II of the project, it will be important for the project proposal to be specific about the types of technology interventions planned (sectors, applications, costs of individual conversions, alternatives selected etc.) as well as their replicability and potential to lead to a market change towards enhancement of energy efficiency across the RAC sector.
- There are some discrepancies in the levels of funding indicated for Components I and II between Section B of the PIF and the table on pages 19-20.

## INTERNATIONAL WATERS

### **34. Regional (Albania, Bosnia-Herzegovina, Croatia, Montenegro): Implementation of the SAP of the Dinaric Karst Aquifer System: Improving Groundwater Governance and Sustainability of Related Ecosystems (UNDP) (GEF Financing: \$5,145,000) GEF ID = 9919**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany appreciates the detailed PIF addressing an innovative approach integrating groundwater and surface water monitoring and management in the Dinaric Karst Aquifer system.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Taking into account the subsequent political challenges, the full proposal should examine the possibility of integrating the two further non-EU Dinaric Karst-sharing countries Serbia and FYA Macedonia to enhance the scientific and technical exchange at a regional level.
- Please revise the section on stakeholder involvement with regard to adding their roles and responsibilities.
- Furthermore, Germany suggest to reassess the risk level in the full proposal, as political support for cooperation and data sharing across four (or even more) countries can be very difficult to obtain. Lack of sustained political support is described as a “major risk” in the PIF, which should be reflected in at least a moderate risk level.

**35. Regional (Belarus, Ukraine): Fostering Multi-Country Cooperation over Conjunctive Surface and Groundwater Management in the Bug and Neman Transboundary River Basins and the Underlying Aquifer Systems (UNDP) (GEF Financing: \$2,731,050) GEF ID = 9767**

✓ Germany's Comments

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany appreciates the thoroughly researched project proposal, which addresses an innovative and pressing topic.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Some of the outcomes should be revised with regard to a precise description of measurable goals (i.e. Outcome 1.1, 2.1, 3.1). Furthermore, it should be ensured that each outcome is matched with a least one output, demonstrating how it shall be achieved (i.e. Outcome 4.1). Generally, the proposed alternative scenario could be elaborated a little further to improve the understanding of the proposed concept (i.e. introduction to ecohydrogeology).
- The section on key stakeholders needs to be revised in order to clearly describe the roles and responsibilities of the main actors.
- The brief risks section should be reassessed to ensure that all risks are addressed.

**36. Regional (Benin, Congo, Cote d'Ivoire, Cameroon, Gabon, Ghana, Guinea, Equatorial Guinea, Guinea-Bissau, Liberia, Nigeria, Sierra Leone, Sao Tome and Principe, Togo, Congo DR): Strengthening of the Enabling Environment, Ecosystem-based Management and Governance to Support Implementation of the Strategic Action Programme of the Guinea Current Large Marine Ecosystem (UNEP/FAO, UNDP, UNIDO) (GEF Financing: \$4,416,210) GEF ID = 9911**

✓ *France's Comments*

- We would like to bring to GEF's and UNEP's attention that FFEM is supporting or carrying due diligence on several projects in this geographical area, crossing over both thematic and pilot sites (such as Marine Protected Areas) targeted in the document project, in particular:
  - On-going projects:
    - Supporting BacoMab, trust fund for Parc National du Banc d'Arguin and Parc National du Diawling, en Mauritanie
    - Supporting Bioguiné, trust fund for protected areas in Guinee Bissau, including Bijagos archipelagos
    - Supporting small island initiative (pilot islands in the focus area: Gorée (Sen), Orango and Urok (GUBissau), Principe (STP)
    - Livelihoods/reforestation of mangrove for carbon credit in Senegal
  - In the final instruction phase:
    - Support to RAMPAO, the west African network of PMA
    - Coastal risks and adaptation on Western Africa - WACA

**Opinion:** favourable, provided the articulation of this project with the above-mentioned projects is considered when drafting the final project document

✓ *Germany's Comments*

- Germany approves this project.
- Germany welcomes the proposal. In particular, the implementation of the FAO-Code of Conduct for Responsible Fisheries as well as the FAO-Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (VGSSF) are seen as crucial for the project's success. The joint programming with the Regional Fisheries Committee (e.g. for the West Central Gulf of Guinea /FCWC and for the Gulf of Guinea COREP) is appreciated. The project design builds on many relevant interventions in the region (e.g. the FAO-based EAF-Nansen Project by NORAD) and is fully in line with the African Fisheries Reform Strategy supported by the Conference of Ministers of Fisheries and Aquaculture (CAMFA / AU-NEPAD 2014). This project is expected to facilitate intersectoral collaboration and strengthen the regional capacities as well as governance systems, which is likely to become leveraged by planned investments under the Africa Package of World Bank and African Development Bank of approximately 778 million USD of loans and grants in the GCLME countries.

**37. Regional (Bosnia-Herzegovina, Moldova, Montenegro, Ukraine, Serbia): Danube River Basin Hydromorphology and River Restoration (DYNA) (WWF-US) (GEF Financing: \$4,422,018) GEF ID = 9801**

✓ *Germany's Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany notes the relevance of the project proposed. The project objective, outcomes and outputs are well presented in the summary.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The PIF lacks a clear description of the envisaged outcomes and outputs in the description of the components. The rather general and quite lengthy introductory paragraphs could be shortened in favor of a more comprehensive description of the planned targets and measures as well as their interlinkages.
- The innovation described seems rather business-as-usual, as integrated approaches to water resource management as well as (external) stakeholder engagement have been practiced for numerous years. To convince with an innovative approach, this section thus needs some revision.

**38. Regional (Burundi, Ethiopia, Kenya, Rwanda, Sudan, Tanzania, Uganda): Enhancing Conjunctive Management of Surface and Groundwater Resources in Selected Transboundary Aquifers: Case Study for Selected Shared Groundwater Bodies in the Nile Basin (UNDP) (GEF Financing: \$5,329,452) GEF ID = 9912**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

The PIF addresses a very important topic, which will contribute to a holistic approach to water resources management in the Nile Basin.

Suggestions for improvements to be made during the drafting of the final project proposal:

- This excellent and thoroughly researched PIF could be improved with regard to the description of the foreseen dissemination in component 3. In the final project proposal, it would be desirable if the concrete activities and actors for upscaling the pilot activities and reaching Outcomes 4 and 5 were described in more detail. This also includes a more detailed description of the knowledge management approach of the project.
- Furthermore, the section on gender equality and women's empowerment could be further elaborated on in order to supply the gender consultant who is to be recruited with a good basis to start from.
- Additionally, to the reference to national sector policies, the linkage between climate change and water should be included in the proposal, where applicable, referring to the priorities within the individual NDCs.
- Germany is already supporting a regional UNDP project "Enhancing Conjunctive Management of Surface and Groundwater Resources in Selected Transboundary

Aquifers: Case Study for Selected Shared Groundwater Bodies”. In this context, we would be interested in the findings of your study on transboundary aquifers.

✓ *United States’ Comments*

- Why is this being coordinated through the NBI and not both the NBI and the Intergovernmental Authority for Development (IGAD)?
- Will all the data from these projects and programs be made publically available? Through both the NBI and IGAD?

**39. Regional (Colombia, Ecuador): Integrated Management of Water Resources of the Mira-Mataje and Carchi-Guaitara, Colombia–Ecuador Binational Basins (UNDP) (GEF Financing: \$3,850,000) GEF ID = 9566**

✓ *Germany’s Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes this project proposal, as it promotes internationally accepted principles in a region where they have not been applied sufficiently so far.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Please ensure that the envisaged co-financing amount, which derives from cash as well as in-kind financing by the two recipient governments, is planned realistically.
- The description of the outcomes 2, 3 and 4 could be more precise: in component 2, the outcome is not clearly stated; in component 3, the description of the outcome demonstrates a rather vague and technical understanding of the concept of Integrated Water Resources Management (IWRM); in component 4, innovative aspects need to be defined to ensure true innovation.
- Introducing IWRM seems to be challenging; firstly, with regard to the understanding of the concept of IWRM in the respective project countries, and secondly in view of the acceptance required for the implementation of the underlying principles of IWRM. Instead of merely stating these challenges, the full proposal could provide some insights on how to confront them in the frame of this project.
- A section on knowledge management should be explicitly included in the full project proposal.

**40. Regional (Mali, Niger, Chad): Economic Growth and Water Security in the Sahel through Improved Groundwater Governance (World Bank) (GEF Financing: \$13,577,982) GEF ID = 9886**

✓ *Germany’s Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany recognizes the importance of this project proposal for moving towards water security in the Sahel region.

Suggestions for improvements to be made during the drafting of the final project proposal:

- The project appears to lack some ambition concerning the regional scope given the large total project sum (incl. over 1 mio. USD co-financing). Therefore, it is suggested to include the other Sahel countries (Mauritania, Senegal, Burkina Faso, Nigeria, Sudan, Ethiopia and Eritrea) at least with regard to the envisaged knowledge management in component 3, where appropriate and feasible. If this regional exchange is already foreseen, the description could be improved in the final project proposal.
- Furthermore, data quality is an issue, which should be clearly addressed in the description of component 1 of the final project proposal. Data deficiencies need to be recognized and considered in the project design. This could, for example, be included in a risks section, which was not included in the PIF due to the different format applied.
- The impacts of climate change on the water sector, especially in the project countries, and the role data plays for any adaptation measures could be highlighted in the project proposal, referring to the respective NDCs, where applicable. In this regard, Germany could facilitate contact with BGR, one of its implementing agencies which is very knowledgeable in the field of ground water issues in particular.
- Lastly, Germany appreciates the will to involve key partners during project planning to ensure that activities are delivered in synergy with ongoing and existing work and that duplications are avoided. This should include the Lake Chad Basin commission, among others. Close coordination with other development partners should also be ensured during project implementation, which is already foreseen in the concept, but can be challenging in practice.

✓ *United States' Comments*

- We agree with the STAP's recommendation to add restorative actions for over-exploited areas as well as inclusion of climate change considerations and adaptive management options in groundwater management plans in Component 2.
- The U.S. Millennium Challenge Corporation (MCC) has plans to do a detailed geospatial survey and hydrogeological study of groundwater in southern Niger, and capacity building for water resources governance. This proposed work seems to align closely to the World Bank Sahel Irrigation Initiative Support Project (SIIP). One thing that has not been fleshed out from MCC's planning is the long-term monitoring (and plans for sustainability-driven adjustments) of abstraction rates. For these reasons, the U.S. is glad to see that long term monitoring is a primary objective for this proposed GEF activity.

- Which national and local stakeholders will be engaged for coordination purposes during the short and long-term monitoring phases?
- USAID's future investments will not be in the same zones as this proposed project, but the USAID mission would be interested in discussing how to layer their investments with this effort and other GEF-funded activities. Please send the project lead contact information to Rebecca Fisher and Lauren Stowe, and they will make the necessary connections.

**41. Regional (Mauritania, Senegal): Strengthening Trans-boundary Cooperation for Improved Ecosystem Management and Restoration in the Senegal delta (Mauritania and Senegal) (IUCN) (GEF Financing: \$3,061,009) GEF ID = 9594**

✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Strengthening the shared governance system to foster the conservation and adaptive management of transboundary ecosystems as well as sustainable regional development are sound and proven to work approaches. It is welcomed that the MAVA's Foundation investment in Senegal Delta Transboundary Biosphere Reserve (SDTBR) of 1 million USD as co-financing to the IUCN/GEF project will be used to strengthen the management of key sites of critical importance for small pelagic fish stocks with improved data collection, development of marine protected area plans incorporating pelagic fisheries, capacity building of fishing communities in critical coastal sites and improved enforcement of regulations. It is also appreciated, that the project will consolidate existing activities to reduce poverty as well as identify additional revenue-generating actions by promoting the increase of the added value of fish through improved artisanal processing. The respective described priority actions are: developing local processing methods, improving the sanitary and commercial quality of fishery products, and improving the sanitary conditions for processing staff (especially women). All these priority actions can be seen as important for a higher local value-addition in the context of around 40% of post-harvest losses in the fisheries value-chain globally. The project design should be prepared to also enable investments into cold-chains and higher value processing as well as marketing where feasible. Maybe synergies with decentralized renewable energy projects could be gained (e.g. BMZ financed "Program for sustainable energies" 2015.2217.6 implemented by GIZ). Ideally more alternative livelihood options for local fisheries villages can be identified than market gardening and ecotourism. For example, a cooperation with vocation training interventions could provide options (e.g. BMZ financed "Being successful in Senegal", 2016.2220.8 implemented by GIZ).
- Germany would like to add the following:

- The project documents should incorporate the implementation of the FAO Code of Conduct for Responsible Fisheries (CCRF) as well as the FAO-Voluntary Guidelines on Small Scale Fisheries (VGSSF) in their component 2 project design.
- A strong collaboration with the Commission Sous-Régionale des Pêches (CSR) about any coastal fisheries intervention in this transboundary context is advised.
- The project design should be prepared to also enable investments into cold-chains and higher value processing as well as marketing for fisheries products where feasible.
- The project should actively seek for more synergies with other interventions to identify alternative livelihoods for local fishing communities.

## LAND DEGRADATION

### 42. Angola: Sustainable Land Management in Target Landscapes in Angola' Southwestern Region (FAO) (GEF Financing: \$2,639,726) GEF ID = 9798

#### ✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- For better consistency, names and terms used should be harmonized, i.e. the name used for Ministry of Agriculture (both MINADER and MINAGRI appear) and the translation of the 2004 LOTU Law, referred to as Land-Use Management Law (page 6, point 13) and as Land Use Planning and Urban Development Law (page 10, point 47).
- There is need to ensure adequate co-financing before approving the PIF: Confirm 5 million USD under sources of co-financing (from multi-lateral partners, still under negotiation).
- Page 10, §51: Reference could be made here to the SDGs: Angola adopted the UN Sustainable Development Goals in 2015, whereas SDG 15.9 stipulates that: “by 2020, ecosystems and biodiversity values are integrated into national and local planning, development processes and poverty reduction strategies, and accounts”.
- Page 12, §61-65: Component 1 on agro-ecological zoning (AEZ) focusses on capacity building of MINAMB staff on AEZ, but does not include the wider application of AEZ for land-use planning in inter-sectoral planning processes. As outlined in §12, several Ministries are involved in land management and land use planning, i.e. Ministry of Agriculture, Ministry of Territorial Administration (MAT) and Ministry of Urban Development and Housing (MUH), with a recently created

National Institute of Territorial Planning and Urban Development (INOTU) under MAT. The component should therefore also include the following activity: Enhance inter-ministerial exchange and coordination on how data and information on AEZ can be used for wider land use planning purposes (could be added to §61). Beneficiaries of trainings should furthermore not be limited to MINAMB staff.

- Page 12, §61-65: In line with output number 1.3 on LDN indicator monitoring, the same section should include reference to the LDN target setting and monitoring process as follows: The activities will directly contribute to the LDN target setting and monitoring process (this could be added to §64).
- Page 17, §94: The German Federal Ministry for Economic Cooperation and Development ended Technical Cooperation with Angola in 2013. Cooperation could however be established with the GIZ-hosted global “Economics of Land Degradation Initiative” for Component/Outcome 3 (Economic analysis).

**43. Djibouti: Sustainable Management of Water Resources, Rangelands and Agropastoral Perimeters in the Cheikhetti Wadi watershed of Djibouti (UNDP) (GEF Financing: \$3,215,068) GEF ID = 9599**

✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany welcomes the integrated land-water management approach of the proposal adapted to the local conditions. Regarding the mechanisms and institutions to be established by the project (i.e. finance platform; Agropastoralism field school; Watershed Committee; Knowledge platform and Monitoring system), it is suggested to provide further detail on their (financial) sustainability after the end of the project.
- The project content is directly related to SDG 15.3 on Land Degradation Neutrality. Therefore, it is suggested to visualize this linkage through reference to the respective conceptual framework in order to ensure synergies with ongoing and/or future Land Degredation Neutrality initiatives.

**44. Macedonia: Promoting Sustainable Land Management (SLM) Through Strengthening Legal and Institutional Framework, Capacity Building and Restoration of Most Vulnerable Mountain Landscapes (UNEP) (GEF Financing: \$3,662,545) GEF ID = 9759**

✓ Germany's Comments

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany welcomes the explicit contributions of the project to the national Land Degradation Neutrality (LDN) process. However, the ownership of the national actors in this process is not clearly described. Therefore, it is suggested to provide further detail on the existing progress by national partners and how their roles and mandates will be considered and strengthened by the project.
- The project output 1.1.4 “Land Degradation Neutrality is achieved through inclusion of Land Degradation Neutrality targets into selected policies and commitments and innovative financing sources are mapped out” is a long-term goal and the feasibility of the achievement of this output in the project lifetime should be reconsidered.
- The project output 1.1.8 “The national erosion map updated, the Rulebook defining the methodology for recognition of erosive zones and zones affected by erosion prepared and applied in the pilot sites” depends on the endorsement of the Rulebook/methodology for the development of the national erosion maps. The sequence of the activities should follow a logical sequence: first definition of the methodology and development of Rulebook, then governmental endorsement and then development of national erosion map.
- The project output 1.2.1 “State Committee on Land Management ensuring integration of Sustainable Land Management and Land Degradation Neutrality aspects in national framework and mainstreaming into relevant policies established” should be supported with an additional output developing roadmaps and establishing interinstitutional mechanisms for policy mainstreaming.
- Regarding the section C. Indicative sources of co-financing for the project by name and by type, concerns are raised regarding the realistic amount of co-financing and possible overlapping of contributions.
- In detail:
  - It is stated that the Ministry of Environment and Physical Planning will provide 5,000,000.00 USD as a grant. The average annual budget of the MoEPP is 11 mil USD (the budget for 2017 is available on the following link: <http://www.finance.gov.mk/mk/node/4105>). It seems a bit unrealistic that they will deduct 5 million in period of 4 years (1.25 mil USD per year), or 15% from their annual operational budget.
  - It is stated that the Ministry of Environment and Physical Planning will provide 8,000,000.00 USD as an in-kind contribution. Taking into consideration that the annual operational budget of the Ministry is 11 million USD, it is a bit unclear how 2 million per year will be provided for in kind contribution (for example resources, office spaces, complimentary activities/projects etc.).
  - It is stated that the Ministry of Agriculture, Forestry and Water Economy will

provide 3,500,000.00 USD as an in-kind contribution. Taking into consideration that this Ministry is not the main beneficiary, it is unclear how this amount of in-kind contribution will be delivered in the period of the project implementation (for example resources, office spaces, complimentary activities etc.).

- The in-kind contributions of the University of Skopje and the University of Tetovo is estimated on 1 million USD per institution, and on page 14 it is written that the contribution will consist in technical knowledge; supporting awareness-raising activities and development of educational materials for SLM. Since the above-mentioned contributions are significant, it is good if the activities are clearly defined and not overlapping with the in-kind contribution of the Ministry of Environment and Physical Planning and the Ministry of Agriculture, Forestry and Water Economy.

## MULTI FOCAL AREA

**45. Global (Afghanistan, Albania, Armenia, Bahamas, China, Cuba, Ethiopia, Georgia, Jordan, St. Kitts And Nevis, Lao PDR, St. Lucia, Marshall Islands, Mali, Niger, Nigeria, Papua New Guinea, Palau, Sierra Leone, Turkey, Tuvalu, Tanzania, Ukraine, Uganda): GEF SGP Sixth Operational Phase- Strategic Implementation using STAR Resources, Tranche 2 (Part IV) (UNDP) GEF Financing: \$19,167,177) GEF ID = 9857**

✓ **Germany's Comments**

- Germany approves this project.

**46. Regional (Barbados, Belize, Colombia, Costa Rica, Cuba, Dominican Republic, Grenada, Guatemala, Guyana, Honduras, Jamaica, St. Kitts And Nevis, St. Lucia, Mexico, Panama, Suriname, Trinidad and Tobago, St. Vincent and Grenadines): CREW+: An Integrated Approach to Water and Wastewater Management Using Innovative Solutions and Promoting Financing Mechanisms in the Wider Caribbean Region (UNEP/IADB) (GEF Financing: \$14,943,938) GEF ID = 9601**

✓ **Germany's Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany recognizes the urgent need to improve the treatment of wastewater in the Wider Caribbean Region to ensure water resources security and thus sustainable development in the region.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The full project proposal should be condensed with regard to generic descriptions and expanded concerning i.e. the description of the proposed components, which

remains rather vague on the PIF, as well as with regard to specifics such as the type of innovative technologies for wastewater treatment proposed. Precise definitions of innovation are often lacking and need to be included in the full project proposal. This should also address the treatment objectives. Currently, the PIF shows a certain lack of consistency, maybe also due to the lengthy descriptions, which should be obliterated in the full project proposal.

- The upscaling potential should be carved out clearer, especially focussing on the connection between the institutional framework and financial leverage. It is correctly stated that both are closely linked: where supportive policies and regulations already existed, there was greater incentive to seek access to the financing mechanisms to implement wastewater infrastructure projects. Based on this insight, the question arises why only half of the partner countries (9 out of 18) are selected for consolidation, improvement and reform of the institutional, policy and legislative frameworks. This selection should be openly addressed and reasoned in the full project proposal.
- Different financial modalities for wastewater management projects were successfully tested and evaluated in the frame of the GEF CReW project. The full project proposal should include concrete ideas on how the lessons learnt will be used for scaling up successful approaches. It could generally be advisable to place stronger focus – also with regard to the available project funds – on the upscaling and implementation of successful approaches than on testing new financial mechanisms and technologies, as a bundle of lessons learnt seems to be already available from experience within the frame of the CReW-project.

**47. Regional (Belarus, Georgia, Ukraine): Promoting Accelerated Uptake of Environmental Technologies and Promotion of Best Practices for Improved Water, Chemicals, and Waste Management in the Black Sea Basin (EBRD) (GEF Financing: \$5,933,105) GEF ID = 9571**

✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- This is a very well designed and thought-through project. Minor suggestions for improvements:
  - Along the lines of the STAP review, Germany suggests to include a monitoring and knowledge transfer component in the PIF to ensure dissemination of knowledge to related GEF projects and other relevant stakeholders that could benefit from the knowledge gained through this project.

**48. Regional (Benin, Sao Tome and Principe, Togo): Investments Towards Resilient Management of Guinea Current Large Marine Ecosystems (World Bank) (GEF Financing: \$20,247,607) GEF ID = 9906**

✓ Germany's Comments

- Germany approves this project.
- All comments made by the secretariat and the STAP in the PIF Document are answered to full satisfaction, especially the approach to strengthen coastal resilience by taking into account the challenges which arise from coastal development as well as including the concept of marine spatial planning.

**49. Regional (Bolivia, Brazil, Colombia, Ecuador, Guyana, Peru, Suriname, Venezuela): Implementation of the Strategic Action Programme to ensure Integrated and Sustainable Management of the Transboundary Water Resources of the Amazon River Basin Considering Climate Variability and Change. (UNEP) GEF Financing: \$11,735,780) GEF ID = 9770**

✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes this project proposal, as it is among the first to strive for the implementation of an Integrated Water Resources Management (IWRM)-approach across the entire Amazonas basin from source to sea, including a basin-wide environmental monitoring approach. The outputs of the project are already formulated in a detailed and convincing manner.

Suggestions for improvements to be made during the drafting of the final project proposal:

- To add clarity to the Indicative Project Description Summary, outcomes and outputs could be linked more clearly, for instance by including numeration. It could also be helpful for the description of the components, outcomes and outputs in the proposed alternative scenarios.
- The section on root causes could be improved by restructuring them along the proposed strategic actions proposed to add to the consistency of the PIF.
- Under Component 3: 'Integrated environmental monitoring and reporting' of the project which responds to topic 3d of the Strategic Action Program (SAP) "Reducing the vulnerability of the most important bio-aquatic ecosystems of the Amazon Basin with special focus on the protection of endangered fish species and regulation of fishing activities.", fisheries come up as a topic. It will be addressed by setting up biodiversity databases and monitoring systems including fish species that play important commercial and nutritional roles within the riverine system. Based on these data a management regime to protect endangered fish species and to regulate fishing activities (Outcome 3) can be achieved. We welcome the planned involvement of key private sector stakeholders from the fishery sector, including small to industrial scales and would like to suggest the UN Food and Agriculture Organisation (FAO)-Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (VGSSF) as one

guiding document through this specific process within the overall project.

- Please avoid duplication in section 6) Innovation, sustainability and potential for scaling up, especially with regard to the listed innovative aspects.
- The knowledge-management approach presented in the PIF could be expanded in order to lay the ground for a dissemination of lessons-learned in other transboundary river basins in the region and beyond.

**50. Algeria: Rehabilitation and Integrated Sustainable Development of Algerian Cork Oak Forest Production Landscapes (FAO) (GEF Financing: \$3,411,644) GEF ID = 9806**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- This proposal can greatly benefit during formulation phase from clearly stating the following:
- Strengthening the analytical part: Reference to the reasons why earlier attempts to management of cork forests including regeneration have fallen short would be an asset, as well as further explanation in which regard this new approach will be different from earlier attempts and overcome past barriers;
- The full proposal should be explicit with regard to forest governance aspects vis-à-vis the expected behavioural changes (e.g. limitation of access of cattle, goats, sheep to forests);
- Furthermore, an explicit and detailed strategy for gender differentiation with regard to future forest use, protection and shared benefits is suggested.

**51. Bahamas: Meeting the Challenge of 2020 in The Bahamas (UNEP) (GEF Financing: \$6,243,004) GEF ID = 9791**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- All comments made by the secretariat and the STAP in the PIF Document are answered to full satisfaction. The focus on ecospecific mangrove restoration for combining conservation of biodiversity and climate mitigation efforts is highly

welcomed.

**52. Belize: Integrated Management of Production Landscapes to Deliver Multiple Global Environmental Benefits (UNDP) (GEF Financing: \$5,108,933) GEF ID = 9796**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes this proposal for the Belize Central Corridor where biodiversity is under increasing threat from agribusiness and small-scale farming. Finding ways on how to integrate protection of remaining forests, create feasible corridors for wildlife and support local communities as well as promote sustainable forms of agricultural production with large landowners is highly relevant in this region.

Suggestions for improvements to be made during the drafting of the final project proposal:

- The proposal is very ambitious in terms of its objectives, it tries to combine many goals in a difficult area where human pressure on the environment is quite high. We suggest further sharpening the focus on biodiversity outcomes and if possible adjusting the level of ambition of objectives, indicators and co-funding.
- The projects wants to promote products (sugarcane, banana) with large-scale agricultural producers with enhanced value chain benefits in markets. However, the large-scale agribusiness has been a main driver of deforestation in Belize and is the highest threat to the conservation of the Belize Central Corridor (together with the deforestation in and outside protected areas by small-scale farmers). We ask the final proposal to elaborate clearly how the support of agroindustrial production as lined out in the proposal (“value chains”) would avoid further deforestation and ensure positive biodiversity impacts.
- Germany also highly recommends including a more detailed overview of the impressive amount of co-funding from Belize. It is of fundamental importance to ensure that resources reserved for the proposed project do not constrain the effective implementation of ongoing conservation efforts.
- Furthermore, Germany recommends building on the experiences and seeking cooperation with development partners such as GIZ who has been working in the area in the past 6 years. The final proposal should elaborate how cooperation with these actors is envisaged.

**53. Burkina Faso: Integrated and Sustainable Management of PONASI Protected Area Landscape (UNDP) (GEF Financing: \$5,279,452) GEF ID = 9764**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following*

*comments are taken into account:*

- Germany welcomes the proposal and supports the suggestions for improvements contributed by STAP.

**54. Cambodia: Integrated Natural Resource Management (INRM) in the Productive, Natural and Forested Landscape of Northern Region of Cambodia (UNDP) (GEF Financing: \$3,340,320) GEF ID = 9781**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- Germany welcomes the proposal and underlines the STAP recommendations, especially those relating to the inclusion of a sound stakeholder analysis for Component 2.

**55. Cameroon: Removing Barriers to Biodiversity Conservation, Land Restoration and Sustainable Forest Management through Community-Based Landscape Management – COBALAM (UNEP) (GEF Financing: \$3,105,023) GEF ID = 9604**

✓ **France's Comments**

- Support to protection of Sacred Forests managed by communities (component 1) is interesting by linking biodiversity protection and socio-cultural traditions
- Integrated multi-sector approach and support to collective governance is relevant to address the multiple drivers of degradation and competition in land use
- In the context of decentralization in Cameroun, municipalities will be key stakeholders for this approach at local level. Close coordination with the Participative National Development Program (PNDP) led by the Ministry of Economy, Planning and Landscape Management (funded by C2D – French Debt Swap and followed by AFD) will be important. PNDP supports municipalities in developing consultative frameworks for land use planning at local scale including different sectors (agriculture, forests, environment, etc.). This aspect is well identified in the project note (p.14).
- In South region, coordination could also be developed with PROFEAAC, project led by CIFOR and MINFOF, under due diligence by FFE (subject to final approval). This pilot project, in the communes of Dzeng and Mindourou, is developing (i) low cost methods to estimate and monitor forest degradation at municipality scale, (ii) pilot models at municipality scale of forest sustainable management. Under the lead of the municipality, this model is combining sustainable artisanal logging in community forests (through official Permis d'Exploitation de Bois d'Oeuvre – PEBO delivered by MINFOF), reforestation measures and agroforestry.

- In the North-West Region, Mount Oku is well identified in the project note as a beekeeping favorable region as alternative to reduce poverty (in component 2). Oku Honey is registered as one of the first geographical indications in Africa, a program to support this GI/value chain is led by OAPI (African Organisation of Intellectual Property) and funded by AFD. Technical support is brought to bee-keepers cooperatives by OAPI and the NGO Man and Nature to valorize on niche markets honey and bee wax as sustainable forest product. Eventual support from the project should coordinate with these initiatives.

**Opinion:** favourable, provided the articulation of this project with the above-mentioned projects is considered when drafting the final project document

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The key role of the decentralized authorities in Cameroon has to be more clearly described and taken into account when further elaborating the proposal. Especially with regard to the roles the councils play. These are the designated authorities to develop the legal and technical framework through the Council Development Plan, which include sustainable land management (SLM) and sustainable Forest management (SFM). Against this background and with view of ensuring sustainable impacts of the project Germany suggests including the Councils as key actors into the project activities.
- Germany further suggests providing more analyses of the agro-ecological potential in the project region in the context paragraphs since this is a decisive factor for mainstreaming biodiversity in the agricultural sector and the respective plans to be developed with support of the project.
- Due to the cross-cutting nature of the proposed project we further suggest ensuring close collaboration with the relevant actors in Cameroon such as Government units responsible for biodiversity.

✓ **Norway's Comments**

- The project seems relevant, and refers to existing challenges and lessons regarding community forests in Cameroon, which has been a pioneering country for this in the Central Africa region
- Under “Coordination” with relevant GEF-financed and other initiatives, it would be useful with a reference to CAFI as Cameroon is a partner country and is developing a national REDD+ investment plan in partnership with the WB/IBRD.

**56. Chile: Mainstreaming Conservation of Coastal Wetlands of Chile's South Center Biodiversity Hotspot through Adaptive Management of Coastal Area Ecosystems**

**(UNEP) (GEF Financing: \$5,146,804) GEF ID = 9766**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

**Suggestions for improvements to be made during the drafting of the final project proposal:**

- The full proposal should state much clearer how the project ensures that sectorial politics are overcome and authorities cooperate to ensure integrated and participatory management. Formal leadership of the environment ministry in the process (and legal power to enforce cooperation of other authorities) should also be elaborated more. It is also important to specify the measures that ensure the further uptake and implementation of SLM after the project has finished, as sectorial management is hard to overcome and faces many obstacles from the main stakeholders.

**57. Congo DR: Mai-Ndombe REDD+ Integrated Project (GEF) (World Bank) (GEF Financing: \$6,210,046) GEF ID = 9760**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

**Suggestions for improvements to be made during the drafting of the final project proposal:**

- The project proposal addresses the most pressing issues: slash and burn agriculture, artisanal charcoal production, reforestation, biodiversity conservation, low-impact logging and capacity building of institutional actors, however:
  - The project should have a stronger focus on strengthening the partner's capacities: Due to the recent incomplete territorial reform, lack of personal and financial capacities, as well as general political volatility, the need to strengthen the capacities of Democratic Republic of Congo (DRC) partner institutions, particularly at provincial level, seems to be more crucial than mentioned in the project proposal. It remains doubtful whether the project's host ministry (MEDD) can really ensure the enforcement of environmental and social safeguard policies.
  - Due to the DRC's moratorium on logging concessions there are presently many inactive concessions in the area of project implementation. Verification of the location and number of active forest concessions will be crucial in order to define the sites for project implementation.
  - Community land rights and biodiversity issues and related impacts on emissions

should be given more attention in the overall objectives of the project as well as in project monitoring.

✓ **Norway's Comments**

- The CAFI and GEF programs are to “serve as a catalytic investment” to the ER Program in Mai Ndombe which is part of the World Bank’s FCPF portfolio. This project’s Emissions Reductions Payment Agreement (ERPA) valued at 60 million USD is listed as “tentatively to be signed with the DRC in June 2017”. It should be noted that this has not yet been signed and negotiations around the ERPA are still ongoing.
- The driver analysis of forest loss and related CO2 emissions seems solid, as well as the lessons learned.
- It is also pointed out here that the project was designed to be included in the National Investment Plan of the “national REDD+ Fund” (FONAREDD?) being developed by the UNDP while constituting the foundation of the Emissions Reduction program and focusing on emissions reduction goals for 2015-2020. This seems somewhat outdated.
- There is a clear overview of what activities will be funded by CAFI and how the GEF component will complement this, such as capacity building of the ministry at the national level.
- It is stated that the GEF local implementing agency will probably be the same as the agency selected by CAFI for the PIREDD Mai Ndombe. This agency has been identified as the World Bank since the end of 2016, and the application should have been updated accordingly.
- The project should also work on minimizing fiduciary risks in its implementation. This is also something CAFI is working on and the fiduciary risk mitigation measures of this project should be at the same level as the PIREDD Mai Ndombe.

✓ **United Kingdom's Comments**

- For the projects proposed in DRC, the UK is keen to understand what safeguards are in place.
- We are also keen to see more detail on how the investments line up with other investments in DRC, for example from the FIPS, Carbon Fund, FCPF and CAFI funding.

✓ **United States' Comments**

- The proposal is vague and needs to provide more information on how it will have clear and significant environmental benefits. It was extremely difficult for our experts to review this proposal with any technical rigor given the lack of details.
- The proposal should identify more extensively and specifically the risks to the project achieving the objectives (1a-1h) and provide clear risk mitigation strategies

that including updating throughout the life of the project.

- The project supports objectives 1b, 1c, 1f, and 1h of the parent proposal but should provide further details on how the additional financing complements and adds values to the ERPD. Both the GEF AF and the CAFI AF appears to be bridge funding until negotiations of the ERPA are complete and in place.
- The project needs to be clearer on objectives and metrics. Just listing hectares or tons of carbon is insufficient, the proposal should detail how these metrics be measured, by whom, and against what standards.
- As stated above, there is insufficient information to determine whether the funding and co-financing per objective are appropriate and adequate to achieve the expected outcomes and outputs. This becomes even more difficult to understand when part F. – “Project’s Target Contributions to Global Environmental Benefits” – in the WB PCN/GEF data sheet appears to be for the entire project and not of the incremental GEF AF funds components. Please provide more detail prior to CEO endorsement.
- The project supports objectives 1b, 1c, 1f, and 1h of the parent proposal but the specifics are lacking. For example, under objective 1b, the GEF AF will fund \$1,000,000 to “more completely address biodiversity conservation issues which would otherwise receive only partial attention under proposed emphasis of the CAFI funding.” While it is commendable to complement funding, the proposal does not define the biodiversity conservation issues that would otherwise receive partial attention. What is the incremental cost that the GEF funding is covering? This is just one example of where the project has not adequately articulated how additional financing will be spent.
- The ERPD has a larger number of partners. The list of partners should be reviewed to be sure that maximum synergy and efficiencies has been taken into account.

**58. Fiji: Community-based Integrated Natural Resource Management Project (FAO)  
(GEF Financing: \$2,119,425) GEF ID = 9880**

✓ **Germany’s Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Component 2 - Sustainable Forest Management:
- Based on extensive experience of German cooperation in Fiji with regard to sustainable forest management (especially the need for training on low impact logging and the application of an newly established diameter limit table), coordination and collaboration between the Food and Agriculture Organization and GIZ in long-term training modules is recommended.
- Project Description/Root causes:

- The outcomes of an ongoing analysis of drivers of deforestation and forest degradation and identification of response strategies by Fiji Forestry Department financed by Forest Carbon Partnership Facility for the REDD+ Readiness Process should be taken into consideration for the full proposal.
- Project Description/Component 2.2.1:
- The proposal sets an ambitious target for mangrove restoration. The full proposal will need to rationalise this amount and include maps of intervention.
- Mangrove forests present a specific management sub-set of forests, thus should be treated separately under each sub-heading (scale of loss, policy environment, etc.). The integration of mangrove conservation would be beneficial in this context.
- Reference could be made to the newly developed National Qualification on Resilience (Certificate Level 1 to 4), which includes entire sub-strands on agriculture, forestry and coastal management (mangroves) respectively.
- Project Description/Baseline projects; Proposed alternative scenario/Component 2:
- Reference is made to climate-resilient root crops identified by SPC/GIZ, “Coping with climate change in Pacific Island regions” (CCCPIR) as baseline project but should be included more clearly in envisaged climate-smart agriculture practices under component 2 of the alternative scenario.
- Proposed alternative scenario/Component 2
- Development and institutionalisation of “Training of Trainers” modules present a complex and long-term process. Consequently, the full proposal should elaborate more detailed which institutions are envisaged and how this institutionalisation is supposed to happen. Entry points could be community-based trainings on resilience by the Ministry of Youth. Further trainings are planned via the Technical Colleges and Fiji National University. SPC/GIZ CCCPIR education component could act as broker.

✓ **United States’ Comments**

- The proposal does not provide much detail about the added value from this project. It states the importance of GEF funding – for example expanding capacity at the local level – but does not give specifics on activities.
- The explanation of the project’s sustainability plan is limited and lacks sufficient technical details. The proposal mentions market-oriented value chains developed through the project, but does not state what these might be, even examples would be welcome. In addition, a lack of market opportunity was a listed risk and should be addressed during project development (this was not clearly stated in the PIF).

**59. Gambia: Landscape Planning and Restoration to Improve Ecosystem Services, and Livelihoods, Expand and Effectively Manage Protected Areas (UNEP) (GEF Financing: \$5,644,685) GEF ID = 9772**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The level of ambition (1000ha) with regard to Sustainable Land Management measures improving productivity and sustainability of land use on rangelands and farmlands and thereby reducing pressure on public areas appears relatively low. The full proposal should elaborate further on economic incentives for population and local government to accept use restrictions in public areas.

✓ **United States' Comments**

- As mentioned in the STAP review, there are economic concerns that could undermine this project. Poverty drives the need to utilize available land for subsistence agriculture, grazing, and charcoal production. Unmanaged bush fires also limit the success of forest restoration projects. In addition, eco-tourism companies in the capital area may benefit more from the conservation efforts than local communities, thus undermining the program goals for local sustainability. We hope that the project team will aim to mitigate these risks.
- The rationale for the GEF's added value to this project is not clear. Specifically, unsustainable agricultural practices in The Gambia are used for a reason, but those practices are culturally and generationally ingrained in communities, which makes SLM extremely challenging. From our experience in the country, the tools to manage land are few and the effort required to manage the land with limited tools is great. Children often play an important role in agricultural production and public schools need to incorporate project concepts of Biodiversity and SLM in order to effectively and simultaneously reach all generations of community members.
- The project could collaborate with the U.S. Peace Corps Environmental Sector to garner volunteer support from those already living in the project area villages. We encourage the project team to consider how the Ministry of Education could be called upon to disseminate relevant project training to teachers in the project area. Children could be exposed to concepts of biodiversity at school and in the community in order to be more consistent with project goals.
- Sustainability is mostly described as top-down effort in this PIF. Community LGAs and environmental groups should be more involved with brainstorming strategies to continue project goals on their own. As noted in the STAP review, there needs to be a stronger emphasis on women and children to make it more sustainable. In addition, Biodiversity and SLM concepts should be adopted by schools as a foundation for agricultural courses and school garden development.

**60. Guinea: Integrated Management of Natural Resources in Middle and Upper Guinea (UNDP) (GEF Financing: \$ 7,060,274) GEF ID = 9783**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- Germany supports the requests made by the STAP.

**61. Guyana: Strengthening the Enabling Framework for Biodiversity Mainstreaming and Mercury Reduction in Small and Medium-scale Gold Mining Operations (UNDP) (GEF Financing: \$ 4,543,352) GEF ID = 9565**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- This is a very well designed and thought-through project. Minor suggestions for improvements:
  - Co-operation with the GEF programme "Global Opportunities for Long-term Development of ASGM Sector (GEF-GOLD)" is suggested, as their respective project objectives are closely intertwined and co-operation could lead to a mutual benefit, maximizing global environmental benefits.

✓ *Japan's Comments*

- The project addresses the ASGM issue in Guyana with the conservation of forest-based biodiversity. Such the multi-focal project will enhance collaboration among different stakeholders and promote co-benefit approach on sound mercury management. For the GEF Secretariat, the review sheet in the database needs to be updated as it does not include the 'agency response'.

✓ *Norway's Comments*

- The overall project seems quite good, is well justified and has a sound approach.
- Nevertheless, some information in the proposal seems outdated. The information on the Norway-Guyana relationship is not up to date. The CI project on Gold Mining in Guyana was kicked off early 2017. This project document was signed in May 2016.
- For correct information about the Norway- Guyana agreement, please refer to the press-release underneath. Please note that the agreement still stands, and is not currently being re-negotiated: <https://www.regjeringen.no/no/aktuelt/press-release-guyana-and-norway-agree-on-how-to-take-partnership-dialogue-forward/id2520691/>
- In the situation analysis there is no reference to the current oil find in Guyana, and the consequences this has for Guyana's economy. This should be reflected in the document.

- The project document refers to ‘The surge in gold prices a few years back’ several places. Please note that the gold prices actually have been quite stable the last 1.5 years, around USD 1200-1300 per ounce. Before that, the prices dropped from 2013 (Check Bloomberg or Infomine for information). However, Guyana had a record high export of gold in 2016 despite the prices being low, given that they exported larger quantities (but not at a higher price).
- When it comes to inter-institutional coordination in relation to land management, the project document gives a good description of the current challenges in Guyana. Please note that FAO recently submitted the project ‘Sustainable Land Management and Development’ to the GRIF, which is expected to be approved soon.
- The MRVS project in Guyana is conducted by Conservation International and Guyana Forestry Commission, not REDD+, although funded by the Norway-Guyana agreement. For the current project ‘MRVS year 6-9’ it is explicitly stated that data will be shared with the Guyana Mining Commission, and that joint efforts will be sought to address illegal mining.
- When it comes to capacity building of miners in Guyana, UNDP could refer to its program on Development Minerals <http://developmentminerals.org/index.php/en/>. Even though gold mining is not targeted, synergies may be drawn from the capacity building activities in e.g. Jamaica.

**62. Haiti: Sustainable Management of Wooded Production Landscapes for Biodiversity Conservation (UNDP/FAO) (GEF Financing: \$6,186,964) GEF ID = 9777**

✓ *Germany’s Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The project is consistent with national priorities.
- Coordination with other initiatives will be necessary to ensure complementarity: GIZ, working since 2009 in the border region of the Massif La Selle, in the fields of conservation, connectivity and the strengthening of sustainable production methods (mainly coffee-based agroforestry systems); AFC, setting up a large scale GCF-financed project with similar approaches in the southwest.
- The project should address more clearly the rehabilitation of unproductive coffee plantations. Given the fact, that unexploited space is virtually not available, willingness to invest will depend on compensation mechanisms for the time of installation of new plantations.
- In the light of population pressure, sustainable intensification of land use practices should be given priority over extension of PA.
- Output 1.1 appears not feasible. “Regional governments” as such do not exist,

municipal governments do not perform land use planning and do not have substantial funds to do so.

- It would be helpful to have more profound analysis of the tangible potentials for „scaling up“ and „gender mainstreaming“ (example Output 2.4./66: income for women through processing)

✓ **United States' Comments**

- This project could incorporate the “healthy soil = nutritious food = vibrant communities” concept, so we recommend the plan of operations consider inclusion of education and outreach activities such as field days, workshops and demonstrations (particularly to young people) that show the importance of life in the soil and how to improve soil health, infiltration rate, organic matter, etc.
- The overall cost of project implementation seems expensive, and raises a concern that funds may not be used as intended. Has the implementing agency explain why they require such a large amount for such a small intervention? The GEF Secretariat should closely monitor the expenses and financial management of this project to assure all funds are used appropriately.

**63. Indonesia: Integrated Management of Peatland Landscapes in Indonesia (IMPLI) (IFAD) (GEF Financing: \$ 4,895,872) GEF ID = 9239**

✓ **Germany's Comments**

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany welcomes the PIF, selecting the Giam Siak Kecil Peatland Landscape as a UNESCO Man and Biosphere Reserve as primary project site. The geographic intervention focusing on peatland management are in line with the national Peatland restoration plan where the province of Riau is one of the priority provinces. Close coordination with other initiatives present in this province is required.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Within the project concept Germany is suggesting highlighting the leadership role of the Peat Agency (BRG) on national level and acknowledging that the legal status of biosphere reserve (Cagar Biosfer) is still underdeveloped in Indonesia.
- Further work on the national legal framework for this protection status is suggested.
- While the private sector (SINAR MAS) is mentioned in the proposal, little information is provided how the private sector is supposed to be included in the local management set up of the project and the biosphere reserve. Further details on the development of the multi-stakeholder approach especially with the private sector are encouraged.

✓ *Japan's Comments*

- Recognizing the importance of peat land management in Indonesia, this proposed project design is suitable.
- As for the JICA (The Japan International Cooperation Agency) project in the country, JICA is currently implementing some projects/studies/researches in close cooperation with MoEF, BRG and other related ministries and local governments. When the project starts, it is recommended that this project team and JICA expert team will exchange information.

✓ *Norway's Comments*

- The baseline description is to the point and the project justified. The project can contribute both to the national peatland restoration agenda and to achieving national climate goals. This assessment builds on the assumption that project implementation will be in line with Indonesian regulations on peat management, including water levels, engagement with relevant stakeholders etc.
- The project could contribute significantly to emission reductions from peatlands in Indonesia and thus also contribute to achieving the goals of the bilateral cooperation between Indonesia and Norway on REDD+. We would like to point out that initial steps of the implementation of a similar project, including preparing detailed peat maps with LiDAR technology, have already taken place in South Sumatra, another province on Sumatra. This project is carried out with financial support from Norway's International Climate and Forest Initiative. The proposed GEF6 project could build upon experience and lessons learned from that project, which so far has been successfully implemented.
- The risk management matrix, in particular the risk mitigation part, could be improved. Opposition to the peat restoration agenda and land tenure conflicts are risks that should be taken into account in the program document.

**64. Indonesia: Strengthening of Social Forestry in Indonesia (World Bank) (GEF Financing: \$14,317,909) GEF ID = 9600**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The full proposal should be more explicit with regard to the economics and gender implications, to user rights and benefits derived from restoration-related activities under the Social Forestry concept.

✓ Norway's Comments

- This project is very relevant, as social forestry is an important part of delivering on improved land use management, forest and bio-diversity protection and stronger rights to land by communities. The project document also demonstrates a strong technical understanding of the context of the sector.
- The success of this project hinges on the relationships that the World Bank can foster with the relevant government institutions at national and sub-national level.
- The World Bank is linking this project to other ongoing work on sustainable landscapes management that they have in country. This is natural, given the clear links that exist between this project and the overall WB-programs in the forest and environment sector. However, there is a risk that if this project is too closely dependent on progress on other fronts of the World Bank interventions, it may fail. The project should therefore, in our view, be able to be implemented independently from the rest of the World Bank interventions in the field, should other parts of the work fall behind.
- In general, the project description is very strong from a technical point of view, but it lacks an overall political analysis of how the different land-tenure issues may be handled in an Indonesia context. What is the political economy analysis of the land-tenure sector, and what is the potential for cross-ministerial coordination and effective implementation in this field? These are highly complex issues that need to be analyzed in order to make real progress for land and forest protection, and strengthened land-tenure rights for communities.
- Here are some more detailed comments on the project proposal:

Stakeholder Mapping and Consultation

- Stakeholder mapping and consultation are very critical when building the concept, particularly because social forestry is a relatively new concept in Indonesian forestry. Summary of problems and recommendations resulted from the recently held Land Tenure Conference 2017 could be a good baseline for this project because it addresses social forestry but in the context of other related issues. Consultations with the network from Land Tenure Conference, such as the CSO Coalition for Land Tenure is highly recommended and could be beneficial to build a solid program.
- Considering the multi-dimensional nature of Social Forestry, it will be critical to make stakeholder mapping for this project from its initial stage. The stakeholder mapping could help to make an inventory of existing resources, network and pool of expertise and to build a good strategy for well-coordinated and integrated implementation. This is especially relevant to make a speedy but accurate and appropriate implementation on the ground as targeted by the Government.

**65. Jamaica: Conserving Biodiversity and Reducing Land Degradation Using an Integrated Landscape Approach (UNDP) (GEF Financing: \$6,210,046) GEF ID = 9862**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- Clarify the role of Maroons and other relevant target groups and stakeholders for achieving the project objective
- The issue of land degradation should be elaborated more prominently in the proposed landscape management approach for conserving biodiversity (refer. To components 1, 2 and 3)
- Component 2 should consider to include the ridge to reef approach as to contribute to supporting connectivity of biodiversity and to reducing land degradation
- Define key ecosystems and the criteria to be applied for their selection; clearly distinguish terminology for planning units and ecosystems
- Include the development of a knowledge management strategy to combine the different components and tools mentioned in 7.
- Revise the proposal to make it more reader-friendly.

✓ **United States' Comments**

- This project would be an excellent way to promote the “healthy soil = nutritious food = vibrant communities” concept. It fits in with the objectives of the project, so we recommend the plan of operations consider inclusion of education and outreach activities such as field days, workshops and demonstrations (particularly to young people) that show the importance of life in the soil and how to improve soil health, infiltration rate, organic matter, etc.
- The overall cost of project implementation seems expensive, for this reason, the next project proposal should have a more detailed budget so that the costs and benefits are clear.

**66. Liberia: Conservation and Sustainable use of Liberia's Coastal Natural Capital (CI)  
(GEF Financing: \$3,944,220) GEF ID = 9573**

✓ **Germany's Comments**

- Germany approves this project.

✓ **United Kingdom's Comments**

- We understand that significant concerns have been raised about the Government of Liberia diluting its marine protection policies, including reducing its exclusion zone. We are keen to see detail of political economy analysis to understand better

the incentives, vested interests and challenges and opportunities of implementing marine protection. The project should not proceed until this has been carried out and we are reassured that the project is consistent with government policy.

**67. Madagascar: Conservation and Improvement of Ecosystem Services for the Atsinanana Region through Agroecology and the Promotion of Sustainable Energy Production (UNEP) (GEF Financing: \$3,789,955) GEF ID = 9793**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- It is not clear why the main implementing partner of this initiative to promote agroecology (application of ecological concepts and principles to agricultural production for the optimization of agroecosystems) is the Ministry of Environment, Ecology and Forests but not the Ministry for Agriculture.
- Although the proposal works on land use planning at regional and district level, the Regional Land Use Scheme (SRAT) is not mentioned.
- Component 2 on restoration of degraded landscapes does not mention the National Strategy on Forest Landscape Restoration validated in February 2017. Issues specifically mentioned by the Forest Landscape Restoration Strategy, such as land tenure security and private sector involvement, should be given more attention in the proposal in parallel to technical matters.
- The component on improved cooking stoves and energy production seems interesting but it is not clear why Atsinanana with its relatively abundant wood resources has been chosen as intervention zone for the project.

**68. Myanmar: My-Coast: Ecosystem-Based Conservation of Myanmar's Southern Coastal Zone (FAO) (GEF Financing: \$3,046,347) GEF ID = 9261**

**69. Namibia: Namibia Integrated Landscape Approach for Enhancing Livelihoods and Environmental Governance to Eradicate Poverty (NILALEG) (UNDP) (GEF Financing: \$10,823,744) GEF ID = 9426**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

The proposed project proposes an integrated landscape management approach for the joint implementation of the Rio Convention. This is innovative and allows for making

use of synergies between addressing land degradation, biodiversity and climate change simultaneously. Key for the implementation of such an approach is land use planning and the actual enforcement of land use plans.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Outputs 1.2 1.3 and 1.5 are directly linked to the ongoing Land Degradation Neutrality (LDN) pilot project, implemented by Ministry of Environment and Tourism (MET) and German development cooperation. The proposal needs to refer to the LDN pilot project and take into account corresponding activities and lessons learnt.
- The proposal offers a relatively thorough assessment of measures implemented by the Namibian government in conjunction with development agencies. However, also other directly related projects financed by the German development cooperation are only superficially mentioned (Land Reform project related Strategic Environmental Assessment/Integrated Regional Land Use Plan measures) or not at all (Biodiversity Management and Climate Change (BMCC) I, Namparks, Community Forestry Project, De-bushing as well as Conservation Agriculture).
- There are a couple of obvious overlaps in terms of Component 2 and some of the abovementioned German Cooperation measures (e.g. development of nature-based enterprises and introduction of conservation agriculture techniques, bush encroachment and public works programme), and proper pre-implementation engagement would be crucial in order to avoid duplication of efforts.

**70. Niger: Integrated Management of Oasis Ecosystems of Northern Niger (IMOE -NN) (UNEP) (GEF Financing: \$4,596,588) GEF ID = 9405**

✓ *Germany's Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany welcomes the proposed project and its objective to contribute to integrated management of vulnerable ecosystems of Niger. However, the proposal lacks some important information.

Therefore, Germany requests that the following suggestions are taken into account:

- The project components as described in section B. should be checked against the description of the component in the Project Overview (page 4), as there is some inconsistency between the two descriptions (e.g. section B under component 1 refers to the establishment and operationalization of a support fund for Oasis and Arid Valley Forests, which is mentioned in the Project Overview only as being part of a national strategy on oasis systems).
- Under the chapter Threats in Chapter 1 (Project Description) describes in very detail the geophysical consequences if water volumes drop. However, the reasons

for this phenomenon are described only as “irrational human activities”. As the project sets out to address these activities, the chapter should describe more in detail these irrational activities.

- The additionality of the intervention compared to the mentioned baseline projects should be outlined in a clearer way: the baseline projects (that also are mentioned as co-financing projects) are listed but it is not clear in which way they form the baseline or how experiences will feed into the proposed project and where the synergies lie, especially with the projects financed by Germany. Also, it should be explained what a “business-as-usual” development project would look like.
- It would be helpful to divide the additional cost reasoning into the three components and describe in detail where the increment compared to the baseline projects lies.
- Under the description of component 3 it is stated that the capacity building in forest management will include the reduction of firewood harvesting volumes. Firewood harvesting will only be reduced if the people have alternatives for energy in view, otherwise reforested areas will soon be used again for firewood collection. Ideas on how the project can provide alternatives for firewood consumption should be outlined here.
- As already stated in the STAP review, chapter 6 (Knowledge management) remains weak and overlaps with the baseline scenario. The recommendation of the STAP review to put in place a formal knowledge management system should be taken up.

**71. Panama: Ecosystem-based Biodiversity Friendly Cattle Production Framework for the Darien Region of Panama (CAF) (GEF Financing: \$3,519,725) GEF ID = 9589**

✓ *Germany’s Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposal; the results can serve as valuable guidance for future lending operations in the agricultural sector.

Therefore, Germany recommends putting special emphasis on sustainability in the final project proposal. In particular, with regard to developing incentives which promote the transition to silvo-pastoral Systems (SPS) and to discouraging the approval of credits for “business as usual” cattle ranching. The latter in addition to the mainstreaming of sustainable use and conservation objectives into the lending operations and development portfolios of the Bank for Agricultural Development.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Indigenous people might not be cattle farmers, however, their reserves are increasingly threatened by land use changes. Indigenous people should therefore participate as actors and interest groups in the development of the land use plan of the Darien.
- Clearer distinction between the development of training for extension service

providers, the integration of such capacity building programmes into MIDA's "National Outreach and Extension Programme for Cattle Farming" (Output 1.3.1) and the training provided to cattle ranchers by (trained) extensionists (Output 1.2.1) would be beneficial. It might be worthwhile to move current Outcome 1.3 before current Outcome 1.2.

**72. Philippines: Enhancing Biodiversity, Maintaining Ecosystem Flows, Enhancing Carbon Stocks through Sustainable Land Management and the Restoration of Degraded Forestlands (FAO) (GEF Financing: \$2,639,726) GEF ID = 9554**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposal, which is overall sound and considers key issues such as alternatives to reforestation; the importance of tenure and restrictions to sustainable forest management; collaboration between Forest Management Bureau and Biodiversity Management Bureau; support to farmers; and sustainable use.

Suggestions for improvements to be made during the drafting of the final project proposal:

- The overall focus is on ecosystem restoration (paragraph 36) linked to the National Greening Program (NGP). Path dependencies are a risk of such an approach. An effective (rehabilitation) strategy should comprise a diverse suite of adaptation strategies to avoid path dependencies and ultimately a reduction in adaptive capacity. Conserving existing forests is often more effective than forest rehabilitation (restoration) or replanting/planting new forests. Supporting natural regeneration is another effective strategy.
- A monitoring system will be established for the project linked to existing systems, particularly forest audit system (paragraph 60). When taking this positive approach we suggest considering two important issues: First, the proposed Monitoring & Evaluation (M&E) system should not be limited to output monitoring (ha planted etc.) but focus on impacts. Secondly, the institutional set-up and sustainability of such an M&E system need to be detailed in the proposal. This is particularly important given recent developments in Department of Environmental and Natural Resources (DENR) such as Lawin and eBMS and requests to keep databases in DENR central (KISS) and not in staff Bureaus.

✓ **United States' Comments**

- Our in-country experts believe that there is a risk that this project might unintentionally deny local communities access to the degraded land that will be restored. There seem to be appropriate mechanisms in place for stakeholder engagement, redress of any lost income, and benefit sharing provisions, however we would like to stress the importance in insuring these mechanisms are duly

following through project implementation.

**73. Philippines: Integrated Approach in the Management of Major Biodiversity Corridors (IA-Biological Corridors) (UNDP) (GEF Financing: \$12,260,241) GEF ID = 9584**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The proposed project region is home to many indigenous people. Their important role in and contributions to the effective management of protected areas should be considered more prominently in the proposed project. This suggestion is based on extensive experiences of German development cooperation with their Philippine partners which could inform the further development of the proposed project.
- The PIF mentions locally managed conservation areas (OECMs) “*Expansion and diversification of PA system*. Following the experience and lessons from a recently concluded UNDP-GEF NewCAPP project, the PA System master planning will include recognition of other area based conservation measures (OECMs) such as indigenous community conserved areas (ICCAs) and local conservation areas (LCAs) managed by local government units (LGUs).” But does not mention Critical Habitats (CH).
- The PIF also does not mention ongoing activities of the German development cooperation implemented by GIZ together with Biodiversity Management Bureau (BMB) on the establishment of CHs, the integration of their establishment in the Forest Land Use Planning (FLUP) and ultimately the integration of FLUPs in Comprehensive Land Use Planings (CLUP). We therefore suggest consideration of Critical Habitats as one category of OECMs and the respective ongoing activities by BMB and development partners.
- Concerning monitoring (“Output 1.4 A compliance monitoring and enforcement strategy developed and adopted”) The PIF is not specific about, for example enforcement monitoring and monitoring for PA management, but prominently mentions scientific monitoring. However, for effective PA management (“Output 2.1 PA specific management measures implemented in 11 protected areas in the two pilot corridors that increase management effectiveness”) patrol-based spatial data collection is needed to provide up-to-date and timely information for management decision-making and planning. The Forest Management Bureau (FMB) introduced the system Lawin through the B-WISER project. BMB uses (e)BMS. We strongly suggest adding a section (including output) about the use of a Department of Environment and Natural Resources (DENR) spatial patrol and biodiversity monitoring system based on the integration of Lawin and eBMS (enhanced Biodiversity Monitoring System). The final proposal should elaborate this in more

detail explaining how the involved institutions can cooperate and establish a central database at DENR-KISS. Support to such DENR wide system would not only address the institutional concerns mentioned in the PIF but would also increase coherence with activities planned in proposal GEF ID 9554.

**74. Seychelles: A Ridge-to-Reef Approach for the Integrated Management of Marine, Coastal and Terrestrial Ecosystems in the Seychelles (UNDP) (GEF Financing: \$3,898,914) GEF ID = 9431**

✓ *Germany's Comments*

- Germany approves this project.

**75. Sierra Leone: Sustainable and Integrated landscape management of the Western Area Peninsula (UNDP) (GEF Financing: \$5,209,910) GEF ID = 9903**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the well-designed project that aims at improving the effectiveness of protected area management including all major components such as institutional capacity building, updating of management plans and development of financing strategies.

Suggestions for improvement to be made during the drafting of the final project proposal:

- Forced evictions and relocations of (indigenous) people might become necessary to reduce encroachment on key biodiversity areas (see "Risks"). At CEO Endorsement stage, detailed information on potential activities in this regard (How many people? Where? Which groups? Form of compensation? Etc.) shall be provided in the proposal. Based on this information the strict implementation of all related GEF guidelines and principles needs to be ensured.
- Securing sustainable financing is expected to be a key challenge for the Western Area Peninsula Multi-Use Landscape. At CEO Endorsement stage, the most promising incentive-based financing approaches shall be presented in detail. Also, the potential role the private sector shall be clear at this stage.

**76. Solomon Islands: EREPA - Ensuring Resilient Ecosystems and Representative Protected Areas in the Solomon Islands (IUCN) (GEF Financing: \$4,918,364) GEF ID = 9846**

✓ *Germany's Comments*

*Germany approves this project in the work program but asks that the following*

*comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- While for the three national government agencies (MECDM, MOFR, MAL) cross sector partnership agreements (Memorandum of Understanding (MOU) style frameworks) are envisioned under Output 1.1.1. For coordination with the three national government agencies (MECDM, MOFR, MAL), the placement of project liaison officers could be helpful.
- The proposal could benefit from including coordination mechanisms with other donors and/or implementing partners. We suggest considering this in the proposal.
- 1.6 Sustainability outlines measures aimed at improving local ownership in general terms. Germany suggests elaborating on their operationalisation in more detail. Again, the strategic placement of liaison officers could assist in fostering ownership.
- In order to ensure successful implementation, the final proposal should provide a detailed overview of the envisaged co-financing, specifying the contribution by different ministries.

✓ **Japan's Comments**

- Regarding the output 2.1.2, it sounds quite ambitious to declare 200,000 ha of protected areas with landowners' consent considering the system of land tenure in Solomon Islands. To acquire landowners' consent, it is important to provide adequate incentives and develop a system for fair benefit sharing during the project implementation. In addition, this project will cover four provinces. Therefore, effective monitoring system needs to be taken into account.
- As for the JICA (The Japan International Cooperation Agency) project in the country, JICA is currently implementing a project titled "The Project on Capacity Development for Sustainable Forest Resource Management in Solomon Islands" and this project has a component of sustainable forest management pilot activities by communities in two pilot sites, which have not been selected yet. When the project starts, it is recommended that this project team and JICA project team will exchange information.

**77. Sri Lanka: Managing Together: Integrating Community-centered, Ecosystem-based Approaches into Forestry, Agriculture and Tourism Sectors (UNDP) (GEF Financing: \$3,346,708) GEF ID = 9372**

✓ **Germany's Comments**

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposal as it addresses a crucial challenge of biodiversity conservation by integrating sustainable Natural Resource Management practices into sector development plans and regional landuse plans.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Against the background of identified shortcomings in inter-agency communication and given the large number of stakeholders to be involved the full proposal should clearly identify a suitable steering structure and a strategy to ensure that ecosystem services can sustainably be integrated into forestry, agriculture and tourism sector decision making processes.
- GIZ on behalf of the Federal Ministry for Economic Cooperation and Development (BMZ) is currently implementing the project “Supporting Wilpattu National Park and Influence Zone Management in Sri Lanka” together with the Department of Wildlife Conservation. Germany recommends to seek an exchange on its approach and the lessons learnt with the project.

**78. St. Kitts And Nevis: Improving Environmental Management through Sustainable Land Management in St. Kitts and Nevis (UNEP) (GEF Financing: \$3,015,982) GEF ID = 9785**

✓ *Germany’s Comments*

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Suggestions for improvements to be made during the drafting of the final project proposal:

- The proposal addresses the three main barriers as explained pg. 6-7 ‘barriers’. However, how to improve the lack of updated and comprehensive data and its effective use should be included in the KM section, e.g. Outcome 3. This includes a clearer explanation how the project will contribute to improve local capacities through making effective inputs into national education, technical and/or academic training programmes, rather than just providing manuals or best practices – the latter does not necessarily or automatically prompt their use.
- Outcome 2.2 states 100 farmers as beneficiaries of training in land restoration and agricultural practices. Germany recommends explaining how this will be scaled up.
- Mangrove area (20 ha) are to be restored (pg.10, 2.1) - meaning newly established? Or, rehabilitated (pg.11, 4); pg.12 Aichi targets) - meaning brought back to their former state? Please clarify, and explain how will this be achieved (reference to 2.1)?
- Much focus is put under 1.3 reduced pressure on three indicator species at two Key Biodiversity Areas (KBA) sites (pg. 2, 9). Where are these mentioned under 4)

Table comparing baseline scenario and incremental cost? Point 2?

- Explain where protection of sea grass beds come in the proposal as they are mentioned under point 2 in 4) pg. 11 – or consider concentrating on mangroves – 20 ha, only.

**79. Sudan: Strengthened Protected Areas System and Integrated Ecosystem Management in Sudan (UNDP) (GEF Financing: \$4,100,913) GEF ID = 9425**

✓ *Germany's Comments*

*Germany approves this project in the work program but requests that the following comments are taken into account:*

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany agrees with the further guidance from STAP. The scale of the project seems overly ambitious and should be reconsidered, especially the hierarchy of interventions outlined in the Project Description Summary should be revised, simplified and show a clear prioritization. Germany requests that conflict, security and governance aspects are integrated into the components by making use of existing tools for projects with conflict dimensions. The role and participation of civil society organisations, indigenous peoples and local communities in project design and implementation should be outlined in detail, in particular with regard to the participatory management of protected areas and the envisaged establishment of new protected areas.

**80. Sudan: Sudan Sustainable Natural Resources Management Project- Additional Financing (World Bank) (GEF Financing: \$5,504,586) GEF ID = 9575**

✓ *Germany's Comments*

- Germany approves this project.

**81. Tanzania: Safeguarding Zanzibar's Forest and Coastal Habitats for Multiple Benefits (UNDP) (GEF Financing: \$5,181,671) GEF ID = 9400**

✓ *Germany's Comments*

- Germany approves this project.

**82. Thailand: Sixth Operational Phase of the GEF Small Grants Programme in Thailand (UNDP) (GEF Financing: \$2,381,620) GEF ID = 9558**

✓ *Germany's Comments*

- Germany approves this project.

## NON-GRANT INSTRUMENT PROJECTS

### 83. Global: CPIC Conservation Finance Initiative - Scaling up and Demonstrating the Value of Blended Finance in Conservation (IUCN) GEF Financing: \$8,250,000) GEF ID = 9914

#### ✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

- Germany welcomes this highly relevant and innovative project. However, Component 2 should include decisive criteria to evaluate the biodiversity-friendliness of an investment. Germany suggests defining and including such criteria in the final proposal.

#### ✓ Norway's Comments

- We consider blended finance in conservation activities to be a way forward that could have significant potential in the coming years. Innovative use of public funding to raise investments from the private sector could bring additional and strongly needed capital into important programs for conservation and sustainable land use.
- The GEF initiative is one of several dealings with blended finance in conservation. The description of challenges to be approached and the model for proposed activities correspond well to similar initiatives. We note that in many ways this initiative will create knowledge and experience on blended finance which could be important for further developments in GEF including for GEF-7.

## PROGRAMATIC APPROACHES

### 84. China: PRC-GEF Partnership Program for Sustainable Agricultural Development (UNDP/FAO, World Bank) (GEF Financing: \$12,303,945) GEF ID = 9768

#### ✓ Germany's Comments

*Germany approves this project in the work program but asks that the following comments are taken into account:*

Germany welcomes the proposal but requests to consider the following issues in the final project proposal:

The programme proposal is sound and well elaborated. The root causes and its drivers are clearly stated. The barriers achieving sustainable agricultural development in China are described in details and are relevant. *The baseline scenario* on agrobiodiversity

conservation states the various responsibilities mainly by state government and the Ministry of Agriculture.

- However, Germany suggests that the important role of universities and agricultural research institutions in the different provinces concerning promotion of agrobiodiversity conservation should be given more emphasis.
- Under *current and recent initiatives* the EU supported Biodiversity Project (ECBP), concluded by 2012, its lessons learned and achievements should be mentioned and considered in the project set up.
- On the *involvement of the target group*: in the component to 2.1 ii) the establishment of at least three successful business partnerships between farmers and commercial marketing outlets in five target provinces seems to be too little considering the total investment by the programme. In addition, the envisaged target population of 40,000 people in capacity building, skills development and partnerships needs to be revised. The amount spent (total programme expenditure divided by 40,000 people) per person would be about \$2400, which raises the question of efficiency.
- Further recommendations:
  - include agriculture universities and research institutions at target provincial level in the programme set up and activities by the programme
  - consider lessons learned from the EU supported Biodiversity Project (ECBP) in the project design
  - consider the establishment of more than three business partnerships (at least three in each province) between farmers and commercial marketing outlets in the five target provinces increase efficiency of the programme by considering a higher target population in the programme set up.