



GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

**COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE GEF
JUNE 2016 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 June 2016 Work Program

TABLE OF CONTENTS

BIODIVERSITY 1

1. Regional (Antigua and Barbuda, Barbados, St. Kitts and Nevis and Regional (Commonwealth of Dominica, Grenada, St. Lucia, St. Vincent and the Grenadines)) - Preventing COSTS of Invasive Alien Species (IAS) in Barbados and the OECS Countries- UNEP - GEF ID = 9408.....1
2. Mexico - Conservation and Sustainable Use of Biological Diversity in Priority Landscapes of Oaxaca and Chiapas- CI - GEF ID = 94451
3. Mexico - Securing the Future of Global Agriculture in the Face of Climate Change by Conserving the Genetic Diversity of the Traditional Agro-ecosystems of Mexico- FAO - GEF ID = 93802
4. Antigua and Barbuda - The Path to 2020 - Antigua and Barbuda - UNEP- GEF ID = 94022

CHEMICALS AND WASTE..... 3

5. Paraguay - Strengthening the Environmentally-sound Management and Final Disposal of PCBs in Paraguay– UNIDO - GEF ID = 93573
6. Georgia - PCB-Free Electricity Distribution in Georgia - UNIDO - GEF ID = 92274

CLIMATE CHNAGE..... 5

7. Turkmenistan - Sustainable Cities: Integrated Green Urban Development in Ashgabat and Awaza- UNDP- GEF ID = 9279.....5
8. Global - Technology Needs Assessments-Phase III - UNEP - GEF ID = 9452.....6
9. Turkey - Sustainable Use of Biomass to Assist the Development of Turkey's Economy towards a Low-carbon Development Path - UNIDO - GEF ID = 92186
10. Comoros- Sustainable Development of Comoros Islands by Promoting the Geothermal Energy Sources - UNDP - GEF ID = 90406
11. Bosnia-Herzegovina - Catalyzing Environmental Finance for Low-Carbon Urban Development - UNDP - GEF ID = 91517
12. Tajikistan- Green Energy SMEs Development Project - UNDP - GEF ID = 91918
13. Jordan- A Systemic Approach to Sustainable Urbanization and Resource Efficiency in Greater Amman Municipality (GAM) - UNDP - GEF ID = 92048
14. Togo - Project of Hybridization of Diesel Engines of Multifunctional Platforms with Solar Systems - BOAD - GEF ID = 9393.....9
15. Central African Republic - Promotion of Small Hydropower Based Mini-Grids for a Better Access to Modern Energy Services in Central

African Republic - UNDP - GEF ID = 9291	10
16. Global - Umbrella Programme for Preparation of National Communications and Biennial Update Reports to the UNFCCC - UNEP - GEF ID = 9442	11

LAND DEGRADATION..... 12

17. Regional (Jordan, Egypt) - Healthy Ecosystems for Rangeland Development (HERD): Sustainable Rangeland Management for Biodiversity Conservation and Climate Change Mitigation - UNEP - GEF ID =9407	12
--	----

MULTI FOCAL AREA..... 12

18. Kazakhstan - Sixth Operational Phase of the GEF Small Grants Programme in Kazakhstan- UNDP - GEF ID = 9205	12
19. Peru - Sustainable Industrial Zone Development in Peru – UNIDO - GEF ID = 9206	13
20. Cuba - Incorporating Multiple Environmental Considerations and their Economic Implications into the Management of Landscapes Forests and Production Sectors in Cuba– UNDP - GEF ID = 9429	15
21. Chad- Restoring Ecological Corridors in Western Chad for Multiple Land and Forests Benefits - RECONNECT- IUCN - GEF ID = 9417	15
22. Dominican Republic - Mainstreaming Conservation of Biodiversity and Ecosystem Services in Productive Landscapes in Threatened Forested Mountainous Areas- UNDP - GEF ID = 9424	16
23. Timor Leste - Securing the Long-term Conservation of Timor Leste Biodiversity and Ecosystem Services through the Establishment of a functioning National Protected Area Network and the Improvement of Natural Resource Management in Priority Catchment Corridor- CI- GEF ID = 9434.....	16
24. Regional (Dominica, Grenada, St. Kitts And Nevis, St. Lucia, St. Vincent and Grenadines) - Caribbean Regional Oceanscape Project – World Bank - GEF ID = 9451	17
25. Uruguay - Climate-smart Livestock Production and Land Restoration in the Uruguayan Rangelands - FAO - GEF ID = 9153.....	18
26. Pakistan - Pakistan Snow Leopard and Ecosystem Protection Program (Resubmission) – UNDP - GEF ID = 9231	18
27. Kazakhstan - Conservation and Sustainable Management of Key Globally Important Ecosystems for Multiple Benefits (Resubmission) – UNDP - GEF ID = 9193.....	18
28. Cameroon - Integrated Sustainable Urban Development (SUDP) and Environmentally Sound Management of Municipal Solid Waste Project in Cameroon (Resubmission)- BOAD - GEF ID = 9234.....	20
29. Costa Rica- Conserving Biodiversity through Sustainable Management in Production Landscapes in Costa Rica - UNDP - GEF	

ID = 9416	21
30. Suriname - Improving Environmental Management in the Mining Sector of Suriname, with Emphasis on Gold Mining - UNDP - GEF ID = 9288.....	22
31. Brazil - Realizing the Biodiversity Conservation Potential of Private Lands – UNEP - GEF ID = 9413.....	23
32. Vietnam - Mainstreaming Natural Resource Management and Biodiversity Conservation objectives into socio-economic development planning and management of Biosphere Reserve in Viet Nam- UNDP - GEF ID = 9361	26
33. Malaysia - Sustainable Management of Peatland Ecosystems in Malaysia (SMPEM)- IFAD - GEF ID = 9270	27
34. Honduras - Agroforestry Landscapes and Sustainable Forest Management that Generate Environmental and Economic Benefits Globally and Locally- UNDP - GEF ID = 9262	28
35. Kenya- Sixth Operational Phase of the GEF Small Grants Programme in Kenya) - UNDP - GEF ID = 9241	29
36. India - Green-Ag: Transforming Indian Agriculture for Global Environmental Benefits and the Conservation of Critical Biodiversity and Forest Landscapes) - FAO- GEF ID = 9243	29
37. Seychelles - Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3) – World Bank - GEF ID = 9250.....	30
38. St. Lucia - Integrated Ecosystem Management and Restoration of Forests on the South East Coast of St. Lucia - UNEP - GEF ID = 9406	30

GEF TRUST FUND/MULTI TRUST FUND PROJECTS SUBMITTED UNDER PROGRAMMATIC APPROACHES..... 31

39. Global (Afghanistan, Botswana, Congo, Cameroon, Ethiopia, Gabon, Indonesia, India, Kenya, Mali, Malawi, Mozambique, Philippines, Thailand, Tanzania, Vietnam, South Africa, Zambia, Zimbabwe) : - Global Partnership on Wildlife Conservation and Crime Prevention for Sustainable Development - (Resubmission of 9071) - World Bank/UNEP, ADB, UNDP - GEF ID = 9439	31
40. Global (Central African Republic, Cameroon, China, Guinea-Bissau, Kenya, Myanmar, Pakistan, Sao Tome and Principe, Tanzania, Congo DR) :- TRI The Restoration Initiative - Fostering Innovation and Integration in Support of the Bonn Challenge IUCN/FAO, UNEP - GEF ID = 9264.....	32
41. Global (Chile, Indonesia, Myanmar, Tunisia, South Africa): Leapfrogging Markets to High Efficiency Products (Appliances, including Lighting, and Electrical Equipment) - (PFD Resubmission of #9083) - UNEP/DBSA, UNDP - GEF ID = 9436.....	33
42. Africa (Ghana, Kenya, Senegal, Tanzania, Zambia): EHPMP -	

Environmental Health and Pollution Management Program in Africa - World Bank - GEF ID = 9444	33
43. Madagascar: S3MR Sustainable Management of Madagascar's Marine Resources WWF-US/World Bank - GEF ID = 9433	38

**JUNE 2016 GEF INTERSESSIONAL WORK PROGRAM:
COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: GEF/C.50)**

BIODIVERSITY

1. Regional (Antigua and Barbuda, Barbados, St. Kitts and Nevis and Regional (Commonwealth of Dominica, Grenada, St. Lucia, St. Vincent and the Grenadines)) - Preventing COSTS of Invasive Alien Species (IAS) in Barbados and the OECS Countries- UNEP - GEF ID = 9408

✓ **Germany's Comments**

Germany approves this PIF 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 project spans across several islands therefore mechanisms coordination and information sharing will be crucial for project success. Germany therefore suggests that the PIF should indicate areas of cooperation and information sharing among the islands, as well as sharing of resources, based on a pre-scheduled timeline.

2. Mexico - Conservation and Sustainable Use of Biological Diversity in Priority Landscapes of Oaxaca and Chiapas- CI - GEF ID = 9445

✓ **Germany's Comments**

Germany approves this PIF 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 coordination at the state level should also consider the planning ministries like Seplan in Chiapas, in order to foster connectivity and corridor approaches. Germany suggests strengthening this in the project proposal.

3. Mexico - Securing the Future of Global Agriculture in the Face of Climate Change by Conserving the Genetic Diversity of the Traditional Agro-ecosystems of Mexico- FAO - GEF ID = 9380

✓ **Germany's Comments**

Germany approves this PIF 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 implementation of the Mainstreaming Component (3.1) could benefit from effective coordination with ongoing bilateral and regional projects that are supporting public policies in this area, also creating synergies with the national implementation of the TEEB approach driven by SEMARNAT. Germany suggests that the final proposal takes this into account.

4. Antigua and Barbuda - The Path to 2020 - Antigua and Barbuda - UNEP- GEF ID = 9402

✓ **Germany's Comments**

Germany approves this PIF in the work program but asks 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 seeks more detailed information and clarification with regard to the actual execution and achievement of the indicators under all components. The PIF in most parts has presented general statements, but has not exactly customized the PIF to the exact components and explained what will be undertaken in the specific situations.
- Germany recommends further strengthening the linkages between the different components to ensure they complement each other.
- There is also concern about the risk allocated to the finances and the certainty that the SIRF Fund will be accessible for Component 1.
- There is also agreement with the STAP request for clarity on Paragraph 3 of the Project Justification. Clear indication of the challenge is still lacking and needs to be strengthened.
- Time, scheduling and the potential failure to complete the works within specific timelines are risks and should be included within the Risk Analysis.
- There is also agreement with the STAP concern regarding the elicitation under Component 2. The 'surrounding communities' component must be addressed either by omitting it from the description or by including sub-components 3.1 and 3.2 under Component 2.

- Under Component 2 (Expansion of protected areas in support of species conservation), the full proposal should describe the data management system for recording of incidents of threats to the species targeted for protection under this Component more clearly.
- As well as Component 3 (Community Management Pilots for in situ management of globally significant biodiversity), the full proposal should clearly indicate and explain the data management system to be implemented.
- A high level of detail and planning is required for Subcomponent 3.2. The full proposal should describe in details how sensitive issues such as storage, contamination and coordination will be dealt with.

✓ **USA's Comments**

- While we support the overall objectives of this proposal, we would like to underscore the STAP's concerns that the proposal is overly vague and lacking critical information on how the components will be operationalized. For example, the proposal contains a small number of points on the expansion of the protected areas network (page 6), which is presumably a large and complex undertaking.
- The proposal is also missing important information in other components. For example, in Component 3.1, which communities will be included and what activities will take place? In 3.2, what is meant by "infrastructure"? In 3.3, the proposal states that "Activities will target farmers..." – what kind of activities are envisioned?
- We urge the Agency to fully address each of the STAP's comments. With further refinement, we believe the proposal could make a lasting contribution to strengthening regulation and financing mechanisms, expansion of protected areas, as well as sustainable use and conservation of biodiversity and genetic resources in Antigua-Barbuda.

CHEMICALS AND WASTE

5. Paraguay - Strengthening the Environmentally-sound Management and Final Disposal of PCBs in Paraguay– UNIDO - GEF ID = 9357

✓ **Germany's Comments**

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

The proposal is mostly well-elaborated and refers to national priorities as set out by the NIP elaboration. Including the Laurety site, the project also tackles a need of very urgent action (immediate reduction of contamination risks). At the same time, implementation does not focus only on "cleaning up", but also on preventive and long-term measures. The envisaged Monitoring and Evaluation system is described in detail, ensuring

continuous review and possibilities for adaption. The cooperation with Alter Vida, a national NGO, is highly welcome, as well as the suggestion of a National PCB Management Center as a center of national technical expertise. Moreover, the consideration of gender aspects has been made in a very positive and constructive way, not only focusing on the higher risk exposure of women and children (as done often). This project seems comparable to the proposal on PCB-Free Electricity Distribution in Georgia (GEF ID: 9227).

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

- Component 1 consists of a variety of activities and outcomes, including capacity development, law enforcement, awareness raising and equipment needs. The bundling of work packages and outputs should be reconsidered in order to gain more clarity and coherence.
- The line between the activities of the proposed GEF-project and those conducted by means of the IADB loan for remediation of the Laurety site should be described in more detail.

✓ **USA's Comments**

- Please consider how lessons learned from the project could be applied to other sectors that use PCBs in Georgia.
- The proposal briefly mentions public participation, but does not describe how it will achieve it – please provide more details on this issue.

6. Georgia - PCB-Free Electricity Distribution in Georgia - UNIDO - GEF ID = 9227

✓ **Germany's Comments**

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

This project is considered to be a valuable measure to support the national implementation of the Stockholm convention. It corresponds to urgent needs of action as assessed during the elaboration of the national implementation plan (NIP). The proposal is very well structured, composed of three clearly defined and complementing components, and shows a comprehensive line of argumentation. Synergies and complementing effects with regard to previous or ongoing projects and activities in the field of POPs in Georgia are well elaborated. The proposed measures are well-balanced between capacity building, law enforcement and technical equipment provision.

The considerable investment (co-financing) from the Georgian State Electro System and private electricity distribution companies improves the sustainability of the project.

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

- The envisaged Monitoring and Evaluation System for project implementation should be elaborated in more detail. The proposal would benefit from considering possible regional cooperation and synergies more thoroughly. Moreover, the possibility and use of a treatment plant for PCB-contaminated equipment/wastes and PCB oils in Georgia could be assessed in more detail with regard to long-term solutions.

CLIMATE CHNAGE

7. Turkmenistan - Sustainable Cities: Integrated Green Urban Development in Ashgabat and Awaza- UNDP- GEF ID = 9279

✓ Germany's Comments

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

The proposal clearly describes the current areas with potential for climate-friendly development in the cities of Ashgabat and Awaza. Given the history in the country of access to free gasoline, heating oil, electricity and water, it is no wonder that end-users have lacked incentives to promote efficient use of resources. The project has therefore identified some low-hanging fruits where mitigation measures will result in significant GHG emissions reductions, for example, in the public lighting, public transport and building sectors. Work on designing, building and placing Turkmenistan's first LEED's certified green hotel, as well as further measures to manage energy, waste and water in hotel operations throughout Awaza are good starting points for the nascent tourism industry in the city.

The method for arriving at GHG emissions savings is not clear, but given the uncertainties regarding the scale of interventions that will be clarified during the PPG, it seems reasonable to expect an updated GHG reduction estimate during project preparation.

Germany encourages coordination and exchange with the Sustainable Cities IAP, and would appreciate information on the links to the integrated approach and notably its global platform.

✓ USA's Comments

- We appreciate the information on how the UNDP will ensure funds it controls are used properly to avoid any fraud/corruption issues, as well as information on the project team's procedures to ensure funds it controls are used for the intended purpose. We continue to have serious concerns that even the proposed accounting measures are not likely prevent significant graft and corruption, as well as our concern that the project as designed is not likely to achieve its stated objectives to reduce greenhouse gasses or create "other environmental, social, and economic development benefits."

- The program is predicated on the “steep and steady rise of the urban population,” however, it is not clear that there are reliable sources of data to support this point.
- The proposal would benefit from informal consultations with representatives of the construction industry, infrastructure developers, and heavy industry near Avaza and Ashgabat who could help to clarify the likelihood that the project will generate genuine environmental benefits.

8. Global - Technology Needs Assessments-Phase III - UNEP - GEF ID = 9452

✓ **Germany’s Comments**

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

Germany welcomes the proposal which aims at enhancing technology transfer in 20 countries through improved Technology Needs Assessments (TNA) and national Technology Action Plans (TAPs).

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

- Germany recommends providing further clarification on the paragraph on partners supporting TNA (6.5): Does this also include the partners which have local projects in place but do not officially engage in TNA?

9. Turkey - Sustainable Use of Biomass to Assist the Development of Turkey's Economy towards a Low-carbon Development Path - UNIDO - GEF ID = 9218

✓ *No comments were received for this project*

10. Comoros- Sustainable Development of Comoros Islands by Promoting the Geothermal Energy Sources - UNDP - GEF ID = 9040

✓ **Germany’s Comments**

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

Germany welcomes the proposal to help the Union of Comoros overcome major shortcomings in its ability to provide clean and efficient energy sources to its population. The current energy situation in Comoros is unsustainable and damaging to the climate with its almost 100% reliance on imported fossil fuels for electricity and its huge energy losses through poor system management. The proposal to further explore the feasibility of exploiting geothermal sources for the installation of a 10MW power plant raises interesting possibilities, but also presents a range of risks that are not fully addressed in

the proposal.

Suggestions for improvements to be made during the drafting of the final project proposal
Germany seeks clarification on the following aspects:

- Who will be in charge of operating the geothermal plant (assuming it moves to the construction stage) and ensuring its maintenance? The state-run utility is described as severely lacking capacity. Will MA-MWE be in charge of running this plant or would it remain in the hands of a private developer?
- Given the significant risks cited for the geothermal project, e.g. a hard-to-reach-site that has no road or water access for drilling, risk of volcanic eruptions, an advanced technology that greatly exceeds local capacities, significant costs (\$80 million if the project makes it through to construction), please provide an explanation as to why other RE technologies were not given preference, i.e. solar? Could a cost-comparison be made to see how much solar could be installed for the equivalent amount of money, i.e. \$80 million? It also seems improbable that the wind potential is so low and a feasibility study should probably be carried out.
- How does the proposed geothermal plant of 10MW fit in with the planned construction of the 18MW heavy-oil power plant? What are total energy demands for Comoros? Why is more focus not placed on improving the efficiency of the currently installed 22 MW of power plants, which only deliver 8MW? It seems like the installation of the 18MW heavy-oil power plant would not permit the country to meet its emissions reductions targets set out in the INDC. Could GEF, UNDP and other project partners condition their support upon stopping the construction of the heavy-oil power plant?
- Does the 1.5 million tons of CO2 savings over the 30 year lifetime assume that the geothermal plant is replacing a fossil fuel plant? Germany would like to seek clarification on how this figure was calculated.

11. Bosnia-Herzegovina - Catalyzing Environmental Finance for Low-Carbon Urban Development - UNDP - GEF ID = 9151

✓ Germany's Comments

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

Germany welcomes the project to catalyze environmental finance for low-carbon urban development in Bosnia/Herzegovina. The project is well-conceived and should be commended for identifying specific areas of complementarity with existing projects that are on-going in the country. By identifying some of the shortcomings of existing projects, this new project seeks to fill in gaps and address important problems that will have a significant impact on GHG emissions and urban livability. Furthermore, opportunities exist for the GEF project to benefit from ongoing efforts, such as UNDP support to the country's 3rd NatCom and 1st BUR, to build up urban MRV systems.

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

- Regarding the high political-related risks of the project, Germany seeks clarification on how the project will succeed in retro-fitting government buildings in the face of a very complex administrative and governmental structure in the country. Please provide information, whether building managers are open to these changes.
- With regard to waste management, and in line with STAP comments, Germany suggests providing more detail about plans to reduce emissions from waste itself, especially with regards to the methods that will be applied (i.e. recycling, reducing organic waste, waste-to-energy, etc.).

12. Tajikistan- Green Energy SMEs Development Project - UNDP - GEF ID = 9191

✓ *Germany's Comments*

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

Germany very much welcomes the proposal which addresses the almost unused potential of renewable energy in general and of small hydropower plants in particular in Tajikistan. Rooted in baseline scenarios and a risk assessment, the proposal delivers a compact overview of measures and envisaged targets. Cooperation partners and existing initiatives are clearly referenced as well. The proposal also ensures a gender-sensitive approach which is welcomed.

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

- The proposal would benefit from being embedded more clearly into the overall strategy of the country to deliver renewable energy. Could the project deliver market transformation on bigger scale as well? This would raise the ambition of the project and might upscale possibilities.
- Clearer indicators of success, for instance, in raising public awareness could be added. Further, linkages between the three components could be pointed out in more detail to present a more complete and comprehensive picture of the envisaged project.

13. Jordan- A Systemic Approach to Sustainable Urbanization and Resource Efficiency in Greater Amman Municipality (GAM) - UNDP - GEF ID = 9204

✓ *Germany's Comments*

- Germany welcomes the project on sustainable urbanization and resource efficiency in the greater Amman municipality. The project's rationalization and objectives are well presented and justified, and the planned components and expected results, which

focus on transformational changes for greater energy efficiency in the building and street lighting sectors, are well conceived. The presentation of the overall sustainability challenge within the context of the massive refugee influx from Syria, which has added significant pressure to energy and water systems in the country, is very compelling and the need for a solution urgent.

- Germany concurs with the proposal.

✓ **USA's Comments**

- Energy efficiency is an important avenue of cooperation to pursue. This proposal includes many of the benefits, but we are not convinced this project as outlined would get at some of the institutional and financial barriers to broader uptake and sustainability unless UNDP makes headway on the enforcement and financial incentives for efficiency measures.
- The focus on streetlights is useful; we have heard from the GAM that they consume a lot of electricity.
- The proposal mentions (p. 13) launching an Energy Star type program, but we understood UNDP had such a program already in place. Please clarify.
- We are not sure the Agency needs to spend so much on demonstration projects to jump-start a retrofit industry (p. 15). We think it might be more important to ensure that efficient products and equipment are readily available on the local market, can be maintained, and are marketed appropriately.

14. Togo - Project of Hybridization of Diesel Engines of Multifunctional Platforms with Solar Systems - BOAD - GEF ID = 9393

✓ **Germany's Comments**

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

Germany welcomes the efforts made by Togo to promote rural electrification via the use of renewable energies

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

The project design could benefit from considering the following aspects:

- The term “PTMF” should be specifically defined to clarify whether they just include an electricity generation unit or also a motor and different productive elements as the picture in annex 2 implies.
- Prices for PV technology have gone down dramatically in recent years. During project preparation, please conduct a detailed cost-revenue analysis (from the investor's point of view) and chose policy instruments that avoid over-subsidization.

Public funds should be used to catalyse private investments. A complete funding of the PTMF investment costs is not necessary as the sale of electricity will generate revenues and the operation of the units might be profitable even without or very little subsidies from public budgets.

- Please consider using batteries as part of the PTMF as it allows storing surplus solar energy for hours of no sunlight and thus further reduces the need to use fossil fuel (diesel) and emit greenhouse gases.
- Germany encourages coordination and information sharing with all donors active in the sector, including German technical and financial cooperation, in order to generate synergies.

✓ **USA's Comments**

- We appreciate the Agency's feedback on worker safety. The project intends to provide guidance and training for the implementation of hybrid diesel and multi-platform solar systems (see below). We would like to underscore our concerns for worker safety, and request that these trainings provide adequate instruction for safety and protection so those installing the systems understand the necessary precautions.
- In addition, the project proposes to dispose of 80,000 tons of POPs. Please ensure the project uses the appropriate safety gear and workplace safety measures to do so.

15. Central African Republic - Promotion of Small Hydropower Based Mini-Grids for a Better Access to Modern Energy Services in Central African Republic - UNDP - GEF ID = 9291

✓ **Germany's Comments**

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

Germany welcomes the project proposal which aims at providing electricity to rural communities in the Central African Republic.

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

The project design would benefit from considering the following aspect:

- Germany would like to note that PV technology should not be excluded from the project. It could have several advantages over small hydropower as it is not dependent on a suitable location, requires no additional grid connection to the villages, requires less maintenance and is likely to have cheaper production costs. PV technology has experienced great price reductions in recent years. Some cells have been designed to capture a broader range of the solar spectrum, thus working efficiently even when it is cloudy. However, average sunshine hours in the Central African Republic are much higher than, e.g., in Germany, where approximately 40.000 MW of PV capacity have

been installed so far and are currently operating at ca. 0.12 € per kWh. Germany would therefore like to encourage the Central African Republic to consider the use of PV technology as it is likely to allow for a faster, cheaper, easier and larger development of rural electrification.

✓ **USA's Comments**

- With regard to the project's global environmental benefits, although it can be expected to produce fewer CO₂ emissions than other potential power sources, depending on the size of the reservoir and if the reservoir is cleared before flooding, significant amounts of methane (a more potent GHG than CO₂) will be released. Please take this into account as you further develop this project.
- One risk of installing micro-hydro is coordinated water management between all of the dams to optimize water release and power production. We recommend the project include awareness raising with government officials about the potential benefits of incorporating centralized coordination among relevant agencies.

16. Global - Umbrella Programme for Preparation of National Communications and Biennial Update Reports to the UNFCCC - UNEP - GEF ID = 9442

✓ **Germany's Comments**

Germany approves this PIF 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 the need of training for the executing agencies to implement sustainable reporting on the domestic level in Component 2 of the PIP. The set-up of processes for regular reporting and the knowledge dissemination of the guidelines in the implementation agencies are crucial for the project success.

✓ **USA's Comments**

- We request information on what project-level procedures will be put in place to ensure funds are used for the intended purpose. Furthermore, we are concerned about the availability of reliable data for this project, which will be an important element in the project's success.
- For Uzbekistan, it is important to note that it has not yet submitted an INDC. In addition, there are no details on the stakeholders that will be involved.

LAND DEGRADATION

17. Regional (Jordan, Egypt) - Healthy Ecosystems for Rangeland Development (HERD): Sustainable Rangeland Management for Biodiversity Conservation and Climate Change Mitigation - UNEP - GEF ID =9407

✓ Germany's Comments

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

Germany supports the project proposal, but asks that the following comments are carefully considered.

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

- The current land tenure situation impedes sustainable management of rangeland in both countries, Jordan and Egypt. While reflected in the project proposal, this crucial problem needs to be given more concrete reflection and attention, especially in the risk section, as this situation might affect or even hinder other components in their efficiency.
- The proposal is very focused on establishing the Hima land management approach for SRM, highlighting the support of Hima communities. There are alternative approaches in Jordan which have shown good performance, especially for biodiversity conservation, and should be considered, such as the well-founded “Community-based Rangeland Rehabilitation Program” (CBRR) developed by the Jordanian Royal Botanic Garden (RBG) or rangeland management measures performed by the Royal Society for Conservation of Nature (RSCN) which do not necessarily follow the Hima system as privileged by IUCN. The proposal mentions generally other management systems but a broader survey of existing alternatives should be taken into consideration before upscaling preferentially or exclusively the Hima model.
- Spreading knowledge results through the FAO-led Pastoralist Knowledge Hub should be considered.

MULTI FOCAL AREA

18. Kazakhstan - Sixth Operational Phase of the GEF Small Grants Programme in Kazakhstan- UNDP - GEF ID = 9205

✓ Germany's Comments

Germany approves this PIF in the work program but asks that the following comments

are taken into account:

Germany approves the project proposal which aims at building social-ecological resilience of steppe and desert landscapes of Kazakhstan.

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

- Support to climate change adaptation planned in SGP should be climate informed. Identification and selection of adaptation measures should be based on vulnerability assessments. Vulnerability assessments ensure the integration of the climate dimension into the investment decision for adaptation – e.g. it is not only about planting shelter belts, but it must be a conscious, climate informed and transparent decision why out of a wide variety of possible measures in a locally specific case the shelterbelts have been chosen. Methodological approaches of international organizations active in the Central Asian region in climate change adaptation, such as UNEP and GIZ, should be taken up.
- Baseline analysis of pasture management should be strengthened taking into account the barriers for livestock mobility that include land tenure regulations and status of herders and pasture committees, user rights and access of small households to pastures.
- Sustainable management and use of game species with direct involvement of local communities should be mentioned in the PIF among types of projects eligible for small grants. For this, well-tested approaches and successful experiences in community-based wildlife management should be taken into account, such as community-based trophy hunting in Tajikistan and Pakistan and Namibia's Community Based Natural Resource Management Programme which combines tourism and hunting to incentivize local communities to rehabilitate habitat and protect wildlife, including endangered species.

19. Peru - Sustainable Industrial Zone Development in Peru – UNIDO - GEF ID = 9206

✓ **Germany's Comments**

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

Germany welcomes the project proposal which aims at introducing the concept of sustainable industrial development in Peru, with a focus on low-carbon and clean technology practices. With regard to the holistic approach of sustainable industrial zone development, Germany suggests that the following aspects are further defined, specifically during the PPG and in the final project document:

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

- The proposal highlights that the concept of sustainable industrial zones is new in Peru, which makes a sound and comprehensive analysis of status quo of industrial areas and industries even more important. Germany suggests undertaking **intensive**

- analysis of status quo of industrial areas in Peru** to understand the country and the local political, economic, environmental and social framework conditions.
- The project objective aims to pilot low-carbon technologies and practices in one Peruvian sustainable industrial zone (IZ Callao). For sustainable industrial zone development, the successful management is highly important, including pro-active service orientation, intensive stakeholder dialogue, facilitating networking and monitoring responsibilities within the Industrial Park and this during all phases of the “life cycle” of an industrial zone, including introduction, planning/design and operation). Successfully supporting and enabling organizational and management structure in Callao to perform these tasks should have role model character for new industrial parks (according to proposal nationwide 8 Industrial Parks are planned / “Several thousand companies are located in industrial clusters not specified as industrial parks showing the potential for up-scaling”). The proposal mentions a “management board”, but doesn’t specify further the status quo (capacities, mandate etc.) of IZ Callao regarding an **organizational and management structure**. Germany considers it important that the proponent further specifies on the existence of these structures as well as associated challenges. Germany therefore recommends aligning adequate budget to related activities and to reflect this aspect adequately in the project structure, capacity building component and with regard to a sufficient time scheduling.
 - Component 3 concentrates on clean and low-carbon technologies pilot demonstrations in 35 companies. Still the proposal does not sufficiently conclude how the piloting of improved environmental performance in these companies will be reflected and accompanied on park management level. Germany recommends that during PPG the advisory approaches for supporting the adoption of industrial park **management plans**, the installing of **monitoring instruments and information management systems** on park management level are assessed and integrated into the project structure. This can include monitoring and collecting data on pollution parameters, risk management, occupational health and safety, energy and resource efficiency.
 - The German Development Cooperation is implementing in Mexico the “Programa Gestión Ambiental Urbana e Industrial II (PGAU II)” project on urban-industrial management. The project COPLAN (“Plataforma de Cooperación de América Latina del Norte”) has supported on regional level the establishment of networks and exchange platforms to strengthen transfer and capacities on environmental and climate-friendly technologies. Germany recommends that during PPG and in the final project outline the **cooperation and knowledge exchange to thematically close projects** in Latin America (also central and north) are integrated.
 - As a holistic approach sustainable industrial development should as well consider climate change impacts. Not only in terms of emission reduction (mitigation) but also in terms of adaptation to climate change related risks, thus preparing industries and industrial zones for extreme weather events. Callao is in direct proximity to the sea, flood risk therefore might be a crucial concern. In Peru, climate change is characterized in terms of two key impacts: i) retreating glaciers, restricting water

supply in coastal and highland regions and ii) the El Niño phenomenon, leading to both heavy rains and droughts. Germany recommends including activities on strengthening resilience through **climate risk management** in industrial zones /parks in the final project document.

20. Cuba - Incorporating Multiple Environmental Considerations and their Economic Implications into the Management of Landscapes Forests and Production Sectors in Cuba– UNDP - GEF ID = 9429

✓ **Germany's Comments**

- Germany recognizes the importance of this project and supports the proposal in all its components.

21. Chad- Restoring Ecological Corridors in Western Chad for Multiple Land and Forests Benefits - RECONNECT- IUCN - GEF ID = 9417

✓ **Germany's Comments**

- Germany fully supports this project proposal in all its components and highly appreciates the close coordination with staff of the German development cooperation in the country initiated by IUCN in developing this proposal. The four project components are solid with regards to their contents and complement the activities of the German development cooperation. Germany particularly appreciates and highlights the importance of support to the Orientation and Decision Making Authorities (ILOD).

✓ **USA's Comments**

- We appreciate the Agency's feedback on worker safety. The workforce needed to restore and maintain ecological corridors in Western Chad will be working in hazardous conditions. We would like to underscore our concerns and request that workers receive appropriate training and protective gear to ensure their health and safety.
- Please ensure the guidelines developed for the project include information pertaining to workplace safety, particularly for those working with mercury, POPs, ODP, groundwater management, soil degradation, and fisheries.

22. Dominican Republic - Mainstreaming Conservation of Biodiversity and Ecosystem Services in Productive Landscapes in Threatened Forested Mountainous Areas- UNDP - GEF ID = 9424

✓ **Germany's Comments**

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

Germany agrees with the proposal which aims to strengthen landscape management and generate environmental benefits, with a particular focus on biodiversity and ecosystem services.

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

- Germany suggests to carefully revise the planned amount of co-funding in the full proposal by the Dominican Ministry of Agriculture (54 Mio \$ US) and verify if this amount can realistically be made available, especially 15 Mio \$ US in cash.

23. Timor Leste - Securing the Long-term Conservation of Timor Leste Biodiversity and Ecosystem Services through the Establishment of a functioning National Protected Area Network and the Improvement of Natural Resource Management in Priority Catchment Corridor- CI- GEF ID = 9434

✓ **Germany's Comments**

Germany approves this PIF 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 final proposal should elaborate in more detail on how the envisaged project will cooperate and take into account the work of other actors working on similar issues in Timor-Leste, these include among others the EU-Global Climate Change Alliance implementation in Timor Leste.
- Outcome 2.1. The outputs related to this outcome need to be based on a solid analysis of drivers of land degradation. The final proposal should either state what data already exists or include an analysis of drivers of land degradation in Timor-Leste.
- Output 2.1.1. elaborates on the process to adopt NRM plans in the traditional system. However, information is lacking on how this process is envisaged in the national system, and where the links are between the two systems and potential challenges for the project's success. Including this information in the full proposal would be of great use.
- Section Environmental problems and root causes: Paragraph 24 should be strengthened. The upland erosion also contributes considerably to the availability of water (quantity) since it affects the water recharge capacity of the upper catchment

areas. Thus, upland erosion control is critical for upper catchment management. The problem analysis should also consider impacts on water quantity.

In Timor Leste a great number of donors are active in closely related areas of activities; therefore Germany recommends exchanging experiences / lessons learned and close coordination with these donors.

✓ **USA's Comments**

- The proposal identifies a large number of problems, but there is no clear implementation plan. How will the project ensure the many legislative changes required will be adopted?
- How will the project activities (e.g. the community ranger program) be sustained when the GEF funding concludes? How will the villagers continue to make money when the proposal states that the government has no money to devote to protection?

24. Regional (Dominica, Grenada, St. Kitts And Nevis, St. Lucia, St. Vincent and Grenadines) - Caribbean Regional Oceanscape Project – World Bank - GEF ID = 9451

✓ **Germany's Comments**

Germany approves this PIF 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:

- A development of five national and one regional Marine Spatial Plan (MSP) as well as five national coastal blue growth master plans are envisaged in this project document. However, the involvement of the five countries and their resulting ownership is not laid out. The co-financing table shows a contribution from the regional Organization of Eastern Caribbean States (OECS) which will be responsible to develop the regional MSP. For national integrated Marine Spatial Plans involving diverse stakeholders at national level and in most cases several different ministries, a strong commitment is needed to steer the process. Regarding the implementation, the PIF refers to other WB projects in the region which are not transparent for external reviewers through the document at hand. This should be clarified during the drafting of the final project proposal.

✓ **USA's Comments**

- This proposal for a Caribbean Regional Oceanscape seems reasonable overall and could make a welcome contribution to the region. However, we would like to emphasize the importance of close cooperation and collaboration between the proposed WB initiative and the existing and well-established CLME+ (Caribbean and North Brazil Shelf Large Marine Ecosystem) project being implemented by UNDP. In particular, we encourage active alignment of relevant “Oceanscape” activities

under the CLME+ SAP (Strategic Action Programme) objectives and activities. Some of the “Oceanscape” project elements are complementary and would make good contribution to the elements of the CLME+SAP. Other initiatives are somewhat similar, thus effort should be made to not duplicate efforts.

- With relation to Marine Spatial Planning (MSP) and related “cutting edge tools” (e.g. page 10 of PIF), including reference to skills and technology transfer from the United States: NOAA has expertise in capacity building for MSP (and MPAs) in general, and in particular in partnership with GEF-funded, UN-implemented global LME projects. Should the WB project wish to pursue elements of MSP for implementation in its initiative (e.g. paragraph 25 sub-bullet ii; paragraph 28, esp. subcomponent 3), we suggest that it engage NOAA through the CLME+ project to participate in advancing this proposed aspect of the “Oceanscape” project.
- With relation to the focus on “blue economy” and “blue growth”: while in concept this is a valuable emerging approach, there is risk in an overemphasis on economic growth at the expense of environmental sustainability. As the project works to develop “blue economy” plans, we encourage the implementers to maintain a primary focus on a sustainable ecosystem that will develop and support economic (and social) sustainability and growth.

25. Uruguay - Climate-smart Livestock Production and Land Restoration in the Uruguayan Rangelands - FAO - GEF ID = 9153

✓ *No comments were received for this project.*

26. Pakistan - Pakistan Snow Leopard and Ecosystem Protection Program (Resubmission) – UNDP - GEF ID = 9231

✓ **Germany’s Comments**

- All comments made by Germany have been addressed and integrated in the revised PIF.

27. Kazakhstan - Conservation and Sustainable Management of Key Globally Important Ecosystems for Multiple Benefits (Resubmission) – UNDP - GEF ID = 9193

✓ **Germany’s Comments**

Germany approves this PIF in the work program but asks 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 believes it is a necessary precondition for successful implementation of the proposed project to have a realistic estimation of the possible level of co-financing and scope of the project. It is important to note that baseline funding, already decided independently of the GEF project and earmarked for specific purposes, should not be considered as co-financing. The final project document should explain in detail the envisaged co-financing of the proposed GEF-project by the Government of Kazakhstan in its additionality to funding of ongoing programs and under current budgetary conditions (moratorium until 2018). Germany also asks for the evidence of the indicated co-financing by CSOs using verifiable documents.
- The project, as detailed in the revised PIF, still focuses on three very different and not directly interlinked complexes of ecosystems in five large mountain systems, three river deltas and one desert region, i.e. nine large project regions. Therefore, Germany underlines the recommendation, in line with the STAP comment, considering possible increases in terms of effectiveness and efficiency of the proposed project by limiting the project intervention on fewer ecosystem types and project regions. In the development of the full proposal possible increases in terms of effectiveness and efficiency should be thoroughly considered. The full proposal needs to justify the geographical focus soundly justified in the light of this analysis.
- Germany appreciates that the Global Snow Leopard and Ecosystem Conservation Program is no longer parent program. Among the addressed ecosystems, snow leopard only inhabits mountain grasslands. Improved protection of mountain forests is therefore irrelevant for snow leopard conservation. The final project document should therefore elaborate on the interlinkage between the components focusing on forest and woodland ecosystem types and the Component III focusing on snow leopard which remains not fully coherent in the PIF.
- Germany had requested a revision of the presented justifying information. The revised PIF still contains factual inaccuracies and several indicator species do not seem suitable for detecting project impact on ecosystems conservation. For example, presented numbers of ibex in East Kazakhstan are unrealistically low; and it is generally unlikely that legal hunting pressure, but not poaching, is the reason for the decline of this species. Germany therefore considers the more profound description of biodiversity values of the sites as well as final selection of the biodiversity indicators (including baseline and target population values or threat reduction values) an important step as indicated in the implementing agency's response to our previous comments.
- Germany would like to underline the importance of increasing the quality of protected area (PA) management and governance for achieving positive impacts on biodiversity conservation. Germany considers this an extremely important dimension of Aichi Target 11. Therefore, the proposal would benefit from building upon a thorough analysis of these issues, on the root causes of the described unsatisfactory performance of existing PA and elaborates clearly on envisaged improvements of management quality of protected areas. The PIF also does not sufficiently address issues related to the expansion of the PA system, related restrictions on current land-users and the assignment of long-term leases of PA lands to third parties. Given these

issues and the unsatisfactory performance of existing PA, the expansion of the PA system bears the risk of being not effective and counterproductive for the conservation of ecosystems and target species. The full proposal should clarify these issues.

- Germany appreciates that the conservation of ungulates through sustainable hunting as well as the direct involvement of local communities in the management and use of game species are now included in the project outputs through “Community based sustainable hunting scheme piloted in at least one district”. The German government has supported successful pilot activities, sharing of best practice experiences and consultations, which show the general feasibility of this approach and opportunities of its adapted application under the conditions of Kazakhstan.
- Germany also appreciates that the inclusion of forest users is mentioned in the revised PIF as well as the illegal trade in saxaul. The participation of communities as forest users, however, should be addressed more specifically and consistently in the description of outputs and activities of the full proposal.

28. Cameroon - Integrated Sustainable Urban Development (SUDP) and Environmentally Sound Management of Municipal Solid Waste Project in Cameroon (Resubmission)- BOAD - GEF ID = 9234

✓ **Germany's Comments**

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

The multi-focal area approach, tackling climate change issues as well as chemicals and waste management in growing urban areas in Cameroon is appreciated. Germany considers SUDP as a very important approach to improve livelihoods and to lower environmental degradation in and negative environmental impacts of urban areas. The proposal tackles two of the most pressing issues in urban areas in Cameroon, namely waste and transport, focusing on the two biggest cities of the country.

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

- The possible interlinkages/synergies between the two tackled issues (waste and mobility) should be pointed out more clearly. The proposal suggests a coordination mechanism for integrated urban planning, including waste management and transport, but fails to list possible synergies/benefits. While the first component, dealing with planning, legislation, capacity building and awareness raising, integrates both issues, the second component, aiming at environmentally sound technologies, neglects the transport sector and looks rather as a stand-alone hazardous waste project.
- Moreover, Germany supports the STAP review concern that a deeper exploration of waste valuation and ways to generate revenue for waste management is needed.

- Moreover, the very high amount of co-financing through AfDB loans as well as the unknown contribution of the private sector raises questions regarding the sustainability of the financing concept.

✓ **USA's Comments**

- While we are supportive of the overarching objectives of this proposal, we believe there are significant issues with its organization and logical flow.
- We agree with the STAP that the proposal seems to bring together multiple issues (e.g. mentions of land use planning and then waste management), without fully explaining the connections.
- We believe the Agency needs to better identify the main objectives of the proposals, as they are not abundantly clear.
- There are overlaps between the different project components, which need to be reconciled in order for the project to be executed in the most efficient way possible. For example, Component 1.2 includes the outcome “Local-level material use policies designed to reduce avoidable waste production and limit the burden of excessive materials entering waste streams” while Component 2 mentions that “Options for waste management valorization will be explored, including composting, recycling, and biogas capture at dumpsites/landfills.”
- The proposal would benefit from additional information on how the outputs will be achieved. For example; for Outcome 1.3, who is the targeted audience for the awareness-raising campaign? And how many households would be targeted in the capacity building program, what are the “effective municipal waste measures” that will be presented, and how will they map on to the infrastructure that is available to these households?
- We urge the Agency to take the STAP’s comments into consideration as it revises the proposal.

29. Costa Rica- Conserving Biodiversity through Sustainable Management in Production Landscapes in Costa Rica - UNDP - GEF ID = 9416

✓ **Germany's Comments**

Germany approves this PIF 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 PIF so far does not refer to thematic synergies with two projects funded by the German Government (BMZ, BMUB) dealing with “Landscape Management” (CCAD-GIZ-BMZ) and “Biocorridor Management” (BMUB-GIZ). Germany suggests analysing the cooperation potential and including it in the full proposal where appropriate.

- The full final proposal should clearly incorporate a coordinating and cooperation structure with the “Programa Nacional de Corredores Biológicos (PNCB) de Costa Rica”, carried out by the National Conservation Authority (SINAC) and GIZ-Project “Apoyo a la Implementación del PNCB en el Marco de la Estrategia de la Biodiversidad de Costa Rica (2014 - 2020) “.

✓ **USA’s Comments**

- We are pleased to see that this proposal will test the approach in both rural and urban areas of Costa Rica that have received far less support for conservation initiatives than other hot spots in Costa Rica such as the Osa Peninsula. We are particularly pleased to see that it mentions both establishing “inter-institutional financial sustainability strategy for long term funding” and “increased collaboration between institutions that form part of the National Forestry Authority” as these are two areas in which GOCCR is rather weak. We also think the connection with the private sector is very positive.
- The U.S. Department of State has partnered with USAID and the USDA to implement an EC LEDS cattle program in Costa Rica that is focused on reducing emissions in cattle sector in Costa Rica. This program could possibly complement this component of the proposal.

30. Suriname - Improving Environmental Management in the Mining Sector of Suriname, with Emphasis on Gold Mining - UNDP - GEF ID = 9288

✓ **Germany’s Comments**

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

The proposal by Suriname is well-structured and has a very clear objective. Germany appreciates in particular the chosen multi-focal and integrated approach (biodiversity, forest, climate change mitigation, chemicals and waste, health/working conditions, sustainable local livelihoods) which is necessary to implement sustainable management of chemicals. At the same time, the project addresses a very vital and growing sector of Suriname’s economy, the mining sector. Moreover, Germany welcomes the goal of mercury emission reduction - even though Suriname has not ratified the Minamata convention yet – and highly appreciates the particular emphasis on strengthening institutional abilities to address mining in protected areas (Component 1). The integration of regional cooperation (component 1) and the broad stakeholder involvement are likely to strengthen the success of the project, even though regional cooperation could be broadened. Public-private partnership concepts which can contribute to the integrated approach of financing sound management of chemicals and wastes are considered.

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

- Improved health among miners should be included as envisaged outcome, accompanied by an appropriate indicator and measurement mechanism (e.g. clinical studies). A clear description of the foreseen monitoring and evaluation system of the project should be included.
- The capacity building by training local personal of NIMOS in combination with the funding of field equipment for sampling (Component 1) is highly welcome, but specification of envisaged sampling types and equipment would be appreciated. It is of high importance to consider locally affordable techniques and technologies to avoid that cost-intensive analyses have to be conducted outside of the country.

The proposed solution strategies concerning already existing mining sites within protected areas should not remain limited to the considered option of offsetting with park expansion, but also explore other options. Compensation by means of expansion in the management area and increased institutional presence might not be enough, especially in regard to illegal operations of already existing sites and illegal installation of new infrastructure. Simple compensation without consequences for already existing operations could enforce new buildings of illegal infrastructure that seeks to be tolerated once it has been built.

✓ *USA's Comments*

- We very much appreciate the information provided on how UNDP will ensure that funds are used properly and avoid any fraud/corruption issues, as well as the procedures the project team will put in place to ensure funds are used for the intended purpose. We would like to underscore our concerns about these issues. We would also like to express concern about the co-financing envisioned given Suriname's co-financing track-record, and urge the Agency to develop contingency plans should the funds mentioned not be available.
- The proposal would be strengthened by addressing the need for an ASGM National Action Plan that conforms to the requirements of Annex C of the Minamata Convention. The text supporting the development of a Mining Strategy should state include the following text: "Mining Strategy including the Minamata ASGM NAP."
- While the proposal discusses the risks to miners from mercury ingestion, it should also risks from airborne emissions. This can be achieved in a number of areas. In addition to identifying risks from of the ingestion of fish, the proposal should identify and target risk from inhalation (pages 8 and 12). Additionally, efforts to identify improvements that could be implemented during the refining stage should include more specific activities such as encouraging the adoption and use of mercury capture systems.

31. Brazil - Realizing the Biodiversity Conservation Potential of Private Lands – UNEP - GEF ID = 9413

✓ *Germany's Comments*

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

Germany agrees with the proposal. The PIF addresses a crucial question of combating deforestation and biodiversity loss in the non-Amazonian regions in Brazil through fostering the framework conditions for the monitoring of native vegetation in private rural lands. The project aims at supporting the implementation of the forest code that is of paramount importance for the achievement of the Aichi Targets in Brazil. However, Germany sees some major conceptual concerns regarding the involvement of key actors, the design of a multi-level strategy as well as regarding the definition of the ecosystem services component, among others.

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

With relation to stakeholder involvement

- Germany suggests that in order to achieve a greater local empowerment through a bottom-up approach in Part II – 2 additional national public policy institutions such as the Brazilian Forestry Agency (SFB), who is responsible for the implementation of the Brazilian Forest Code, and the Environmental Organizations of the Brazilian States (Environment Secretariats and their implementing agencies) should be included in the project implementation.
- Furthermore the proposal would benefit from a closer cooperation with national networks such as Observatório do Código Florestal and with rural extension agencies at federal level (ANATER) or at regional level, especially for mainstreaming capacity building efforts.
- The final proposal should consider how cooperation with further academic institutions beside the PUC-Rio can be established in order to support the implementation of all three components for example with the department of Ecology, Landscape Management and Conservation (LEPAC) from the University of São Paulo (USP), in particular the “Interface Project” which focuses on the evaluation of ecosystem services in restored forest landscapes.

Regarding the “associate projects”

- Germany suggests to consider closer cooperation with the following projects of German cooperation for Sustainable Development “Environmental regulation in Brazil – CAR” (funding BMZ, implemented by GIZ), “Rural Environmental registry in the Amazon” (funding BMZ, implemented by KfW), as well as “Biodiversity Conservation through the integration of Ecosystem Services into Public Policy and Business Action (TEEB Regional-Local)” (funding BMUB, implemented by GIZ) regarding the ecosystem services dimension.

With regard to “consistency with national priorities”

- Germany suggests to include clear reference to the “Action Plan for Prevention and Control of Deforestation and Fires in the Cerrado – PPCerrado”, as it is a federal operative program that includes land use planning for conservation of biodiversity, protection and sustainable use of water resources as well as actions

to encourage economic activities and an environmentally sustainable maintenance of natural areas and restoration of degraded forests. In addition, regarding specifically the incentive schemes and the output 3.2.1., the National REDD-strategy “ENREDD+” that aims to contribute to climate change mitigation through the elimination of illegal logging, conservation and recovery of forest ecosystems and the development of a sustainable low carbon forest economy, generating economic, social and environmental benefits should be taken into account.

With relation to components 1 and 2:

- Germany would like to emphasize that the full proposal should clarify the proposed indicator system for ecosystem services. Specifically, elaborate on how the output 2.1 will be achieved since the proposal does not define any baseline/indicators for ecosystem services provision. This should include identification of those ecosystem services and how these will be measured. According to the CBD, the indicator “Trends in the delivery of ecosystem services and equitable benefits from protected areas” is one of the additional proposed indicators for measuring the achievement of Aichi Target number 11. In the output 1.2.1 it is necessary that the proposal specifies again how the improved provision of ecosystem services will be monitored and measured.

Regarding component 3

- Germany would also like to emphasize that the full proposal should clearly identify how the NAMS will be linked with landscape management strategies, river basin and protected areas management plans at the regional-local level (mainly at the state level). By the Federal Law No.140/2011, the federal government, states and municipalities share responsibilities in the protection, defense and preservation of an ecologically balanced environment. Consequently, it is important that the project integrates an analysis on how this multilevel cooperation will work, for instance in capacity building, learning from management experiences of private areas in the state level, etc.
- Likewise in component 3, Germany requests that efforts will be directed towards the implementation of the previous instruments of the environmental regulation (e.g. CAR registration, validation of CAR, elaboration and implementation of Environmental Programs – PRA). Therefore the risks classification should be revised in two cases: The establishment of the CRA market will be time-consuming. Although the regulatory framework for the new incentive scheme is at the design stage, there is no time perspective when this market will be fully operational. Therefore Germany recommends that the risk for the implementation of the CRA market should be changed from “medium” to “high”. In addition, the validation of CAR registries should be considered as “high” risk because of the importance of validation for the quality of the information from SiCAR. Without validation, no further measures can be taken in regard to the conservation of private set-aside areas.

✓ USA’s Comments

- The project's component 1 mentions General Coordination, Guidelines and Federal regulations for Private Set-Aside Areas (PSAA) established by the Brazilian Forest Code – Law 12.651/12: Developing a regulatory framework is a legislative activity and is not covered by the project. The proposal states elsewhere that there is a lack of coordination among the various levels of government and various laws. we agree that a lack of coordination within the various levels of Brazilian government (federal, state and municipal) is an institutional problem. Public servants are already mandated to provide inputs to improve legislation that depends on the political will of Congress. Our suggestion is to reallocate the money set aside for this purpose to other project goals.
- As to output 2.1.2 referring to APA Pouso Alegre, we would like to highlight the management plan for this area that was recently approved . We recommend that the project implementers reflect the plan details in the final project. Rural property owners do have set-aside areas and are reportedly eager for the implementation of CRA – the environmental reserve quota. The project is in line with implementation of the Brazilian Forest Code and will provide some of the necessary tools to implement the Code.

32. Vietnam - Mainstreaming Natural Resource Management and Biodiversity Conservation objectives into socio-economic development planning and management of Biosphere Reserve in Viet Nam- UNDP - GEF ID = 9361

✓ *Germany's Comments*

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

Germany welcomes the proposal. However, Germany would like to encourage that the full proposal considers how to support the development of a comprehensive conceptual approach for protected area management and their sustainable financing in Vietnam. This comprehensive approach should rather build on existing, already tested approaches as well as take into account the capacities in the responsible Vietnamese government institutions at national, provincial and local level, instead of laying the focus on introducing new concepts and instruments.

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

- The development of a legal framework integrating the mitigation hierarchy, especially biodiversity offsets, as mentioned under project component 1 seems ambitious in the current political context. Germany therefore suggests that the corresponding project outcome may need to be revised in the further development of the proposal. The revision should explicitly take into account the current legal framework, lay out clearly which laws and regulations would have to be amended and introduced, respectively, as well as describe how mechanisms like biodiversity offsetting could be implemented and enforced in collaboration with state and private enterprises.

- Furthermore, the full proposal should take increasingly into account lessons learned from other GEF-financed projects such as “Removing Barriers Hindering Protected Area Management Effectiveness in Vietnam” (completed) and “Conservation of Critical Wetland Protected Areas and Linked Landscapes” (ongoing) both implemented together with the Biodiversity Conservation Agency (MONRE). Successfully developed and implemented approaches and instruments should be taken up in the full proposal in order to support the development of a comprehensive and coherent approach to protected area management and sustainable financing in Vietnam. Especially outcome 3 of the proposed project “Knowledge and experience of sustainable financing options” could benefit from these experiences.
- Page 8 mentions a lack of “landscape level planning”. It is unclear what is meant by this terminology. Vietnam realizes two types of sectoral spatial planning in relation to environment and landscape protection: “environment protection planning” and “biodiversity planning”. The full proposal should base its argumentation on these existing planning instruments.

✓ **USA’s Comments**

- This detailed and ambitious project proposal is consistent with the goals of CBD and UNCCD. Vietnam has established a strong baseline scenario, and made clear and achievable targets with GEF funding. The risks associated with properly engaging stakeholders may be slightly understated in the table when compared with the more detailed explanation in the background text of the proposal; nevertheless the concept is solid and could make a lasting contribution to sustainable management and conservation in Vietnam.

33. Malaysia - Sustainable Management of Peatland Ecosystems in Malaysia (SMPEM)- IFAD - GEF ID = 9270

✓ **Germany’s Comments**

Germany approves this PIF in the work program but asks 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:

To complete the proposal a few additional issues should be integrated into the proposal:

Component 1, output 1.2

- Sustainable palm oil production is mentioned as the only agricultural activity on peat land, however experiences in other countries suggest that it could be worthwhile to include alternative agricultural activities which are better adapted to peatland ecosystems:

- Paludiculture (wetland agriculture) should be taken into account as this concept does not require lowering the water table of peatland therefore avoiding land and forest fires as one of the biggest threats to peat ecosystems and at the same time stopping emissions from oxidation of peat soils
- While mentioning repeatedly involvement of communities, no measures are mentioned to protect the communities and how to take into account their interests:
 - Social safeguards should be planned and integrated into the proposal and implemented in the field

Component 2, output 2.2

- The international community and individual countries are developing MRV concepts to measure emissions and emission reductions. Peatlands as one of the ecosystems with the highest storage capacities of carbon should be an integrated part of such a MRV system.
 - To measure the effectiveness of reduction of GHG emissions and the success of the project the activities of the project should be integrated into a national MRV system. Therefore a monitoring concept for the project has to be developed and established and an emission baseline has to be established at the start of the project
- Peatland rehabilitation is an important part of the project. However, some of the peatlands might be already beyond rehabilitation because the ecosystem is too heavy damaged.
 - A rehabilitation concept should be developed and criteria established in order to assess the ecological and economic feasibility of individual peatlands to be rehabilitated or not.

34. Honduras - Agroforestry Landscapes and Sustainable Forest Management that Generate Environmental and Economic Benefits Globally and Locally- UNDP - GEF ID = 9262

✓ Germany's Comments

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

- Germany acknowledges the high importance of this topic and the envisaged interventions.
- Germany recommends reviewing the geographical distribution of the project region (project justification): e.g. Choluteca, Valle and El Paraiso constitute in our understanding the Southern Part of the country, characterized by a hot and dry climate; the “corredor seco” stretches from south up to Copán along the western part of Honduras, titling it as “corredor seco-húmedo” does not seem correct.

- Germany seeks further clarification on the compensation of ecosystem services and the role of private users of resources in this regard, also bearing in mind that the awareness regarding the value of ecosystem services is still limited among the population.
- Given that “Eco-stoves” is a well-known concept in the country, Germany suggests building on and utilizing experiences and lessons learnt.
- The project proposal would benefit from taking into account other closely related projects, including in the same geographical region, such as GIZ’s “PROCAMBIO” Project and coordination with such projects should be ensured.

35. Kenya- Sixth Operational Phase of the GEF Small Grants Programme in Kenya) - UNDP - GEF ID = 9241

✓ *No comments were received for this project*

36. India - Green-Ag: Transforming Indian Agriculture for Global Environmental Benefits and the Conservation of Critical Biodiversity and Forest Landscapes) - FAO- GEF ID = 9243

✓ **Germany’s Comments**

- Germany supports the proposal without further comments.

✓ **USA’s Comments**

- This very ambitious proposal seeks to generate substantial changes to India’s agricultural system. While we are supportive of the overall objectives and think this proposal could make very important contributions, we believe the proposal would benefit from further refinement of the interventions planned. We underscore the STAP’s concern that the broad nature of this proposal has come at the expense of clearly defined objectives and interventions.
- We also share the STAP’s concern that there is a lot of discussion of the “Green Landscape Conservation Strategies” and the “Common Vision for Sustainable Agriculture,” but there is not much information on what will happen on the ground as a result.
- The description of the alignment with the Conventions needs to be strengthened.
- Many of the stated goals are vague and difficult to implement, let alone to measure progress on (e.g. “out-sized catalytic change,” shifting to an “outcome focus from an output focus,” guaranteeing with seemingly absolute certainty major changes in nation, regional and local policies).
- In our experience, it will be very difficult for India to reduce its use of groundwater and other sources of water as farmers currently have no incentive to use alternate

irrigation methods.

- When improved, we believe this project will make significant contributions to several of the Aichi Biodiversity Targets, especially with regard to prioritizing conservation action in areas with the highest ecological value. This effort would contribute to an important, long-term transformation of the country's land use and agricultural practices, make a lasting contribution to global environmental goals, and contribute to sustainable management and conservation in India- where the continued pressures of population and poverty place considerable strain on resources.

37. Seychelles - Third South West Indian Ocean Fisheries Governance and Shared Growth Project (SWIOFish3) – World Bank - GEF ID = 9250

✓ **Germany's Comments**

Germany approves this PIF 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 gives a good background, facts and figures on the situation of natural resources and existing challenges in governance. However, it is not clearly described how these challenges will be approached. For example in paragraph 13 it is mentioned that “The MPAs are managed by different organizations and fall under the mandates of three ministerial portfolios.” As the partner ministry in the country, that will also provide co-financing, is the Ministry of Finance, Trade and the Blue Economy; an explanation about how to set up an integrated approach with other concerned ministries and stakeholders would be helpful.

38. St. Lucia - Integrated Ecosystem Management and Restoration of Forests on the South East Coast of St. Lucia - UNEP - GEF ID = 9406

✓ **Germany's Comments**

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

Germany agrees with the proposal.

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

- Regarding Component 1 (Strengthening regulations, institutions and financing mechanisms), Germany suggests that the full project proposal elaborates on the methods for undertaking the Protected Area Management Scoring, a key indicator under this component
- The full proposal should elaborate on Knowledge Management in more detail.

- Success under Project Component 2 (Restored/Rehabilitated productive landscapes), Output 2.2 as it corresponds to Program 6 under the International Waters Strategy should be tracked using the GEF International Waters Tracking Tool. Reference to the use and applicability of this tool should be indicated.

GEF TRUST FUND/MULTI TRUST FUND PROJECTS SUBMITTED UNDER PROGRAMMATIC APPROACHES

39. Global (Afghanistan, Botswana, Congo, Cameroon, Ethiopia, Gabon, Indonesia, India, Kenya, Mali, Malawi, Mozambique, Philippines, Thailand, Tanzania, Vietnam, South Africa, Zambia, Zimbabwe) : - Global Partnership on Wildlife Conservation and Crime Prevention for Sustainable Development - (Resubmission of 9071) - World Bank/UNEP, ADB, UNDP - GEF ID = 9439

✓ **Germany's Comments**

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

Germany welcomes this comprehensive approach to promote wildlife conservation, combat poaching, tackle illegal wildlife trade and reduce demand. Based on a thorough analysis of root causes, the proposed approach and objectives are aligned along the entire illegal trade chain, addressing conservation, sustainable use, law enforcement and demand reduction. A positive element is the explicit consideration and involvement of (local) communities. Germany also welcomes the combination of urgent, short term measures, with necessary long term solutions. Overall, the objectives seem fairly ambitious. Reducing poaching numbers and illegal wildlife trade as well as increasing arrests and convictions is highly complex, and will require time, political will and resources; same applies particularly to demand reduction as this needs behavior change.

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

- Outcome 2: involving communities and increasing benefits from wildlife will in many countries also require policy and legal frameworks to support access to natural resources, land use rights, governance of protected areas, and benefit sharing agreements. This needs to be taken into account;
- The strengthening of the dialogue between particularly African range-states and esp. Asian consumer countries should be included and reinforced where feasible;
- Germany suggests strengthening the element of enhancing site-based enforcement also through ranger motivation (e.g. social security, strengthening the link between performance and valued rewards etc.);
- There are a number of operational and planned German-funded initiatives (mainly implemented through GIZ and KfW) which are highly relevant for the implementation of this program, such as the global cross-sectoral project to combat

poaching and illegal wildlife trade (GIZ “Polifund”, KfW activities in SADC region, especially the support to Zambia-Malawi TFCA). Cooperation with these ongoing initiatives should be taken into account; coherence of interventions should be assured.

- A German funded project under SADC was completed in 2015, executing a forest inventory under REDD+ in the eastern Part of Eastern Province. Outcomes should be taken into consideration for the preparation of forest management and land use plans.

✓ **USA’s Comments**

- We are pleased to see the GEF supporting significant efforts to combat wildlife trafficking. The program hits all of the important angles needed in this area, with good targets and indicators. But some weakness remain in terms of ensuring efforts are complementary to and not duplicative of activities implemented by other organizations.
- The rationale for a program instead of several separate projects is not fully explained.
- Please provide more detail regarding the co-financing and how it will be acquired.
- A lot of the resources on this issue are going to elephants, rhinos, and big cats. With a program of this size, we recommend a more strategic view in places, pursuing strategies designed to benefit all species and biodiversity as a whole. We also suggest that a higher percentage of funds go to demand reduction, which is equally important to the other activities and is also somewhat underserved by initiatives.
- What project level procedures will be in place to minimize misuse of funds.
- We have some concerns about the sites selected. For example, South Africa’s Kruger National Park already receives considerable support from donors, and rhino poaching fell there last year while it increased at other sites. It is not clear that there is a need for UNEP to also join efforts there.

40. Global (Central African Republic, Cameroon, China, Guinea-Bissau, Kenya, Myanmar, Pakistan, Sao Tome and Principe, Tanzania, Congo DR) :- TRI The Restoration Initiative - Fostering Innovation and Integration in Support of the Bonn Challenge IUCN/FAO, UNEP - GEF ID = 9264

✓ **Germany’s Comments**

Germany approves this PIF 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:

- Essential remarks from STAP are shared by Germany and entail significant concern. The child projects appear to stand alone with no conceptual input from the programme. It is difficult to derive how the programme framework will guide the child projects in

core issues of institutional and operational sustainability, such as extension and service systems, technical education, land tenure and incentives.

- Germany suggests further clarification, how the programme is meant to encourage political will for governance reform and investment into restoration approaches. Political will appears as an assumption rather than a purpose of the programme.
- Economic models on costs and benefits of landscape restoration need to be exemplified in order to underpin the plans for private investment generation.
- Germany recommends incorporating coordination and networking with existing initiatives and programmes in the field of landscape restoration at international as well as national levels more systematically.

✓ **Japan's Comments**

- When considering a target country in GEF projects, it is important to take into consideration the impact of externalities and scale of economy (GDP, foreign currency reserves etc.) of each country, with a view to effective utilization of limited GEF resources.
- In general, while we acknowledge that the GEF allocates fund along with the STAR system, Least Developed Countries (LDCs), lower income countries and less developed region in these countries should be prioritized in allocating GEF resources.
- Accordingly, the funding for the projects that take place in countries with larger economic scale should be covered by co-financing of related institutions instead of GEF resources.
- From these points of view, GEF secretariat may wish to reconsider whether the target countries and regions

41. Global (Chile, Indonesia, Myanmar, Tunisia, South Africa): Leapfrogging Markets to High Efficiency Products (Appliances, including Lighting, and Electrical Equipment) - (PFD Resubmission of #9083) - UNEP/DBSA, UNDP - GEF ID = 9436

✓ **Germany's Comments**

- Germany recognizes the importance of this project and supports the proposal in all its components.

42. Africa (Ghana, Kenya, Senegal, Tanzania, Zambia): EHPMP - Environmental Health and Pollution Management Program in Africa - World Bank - GEF ID = 9444

✓ **Canada's Comments**

Overall, Canada supports the intent of this project, which addresses issues that the target countries are struggling with that cause significant environmental and health damage. For example, Artisanal and Small-scale gold mining (ASGM) issues, in a largely illegal context. Establishing the frameworks to address those issues is a good start. We also note with appreciation that this is one of the first integrated attempts to assist African countries to develop strategies and plans to reduce the risks of exposure to harmful and toxic chemicals, such as mercury, lead, waste and POPs.

- That said, Canada has concerns that should be addressed in the revised program for resubmission to Council for approval.
- Canada shares many of the concerns raised by the GEF Secretariat and STAP, particularly as those related to ASGM and the obligations in the Minamata Convention. We look forward to hearing how these comments are fully addressed.
- In general, our concerns with the program include: the need for more direct interventions with Artisanal and Small-Scale Mining (ASM) miners at the community level; the focus on one, yet unproven, method of remediating contaminated sites; dealing with cross-border regional issues; and insufficient costing details. Specific concerns are outlined below in more detail.
- It is our understanding that the proposal incorrectly references the Artisanal Gold Council (AGC) as having been consulted. Please correct the statement and/or ensure appropriate stakeholder engagement is conducted, including the AGC, as appropriate.
- Canada wishes to highlight that this program would be undertaken in advance of international guidance on managing contaminated sites and determining best practices for remediation of ASGM. This guidance is in the early stages of development under the Minamata Convention. This should be taken into account and reflected in the project proposal and when available, the guidance should be used, where relevant.
- In Canada's view, at this time resources would be better spent on a comprehensive assessment of ASGM sector in Tanzania and Ghana and the preparation of National Action Plans (NAPs), as required under the Minamata Convention and as a basis for work related to managing mercury in the priority sectors. The documents notes that both Ghana and Tanzania have signed the Minamata Convention and are considering ratification, and that UNEP is supporting preparations of NAPs. In this context, it would be important to clarify the value-added of GEF funding toward these separate projects and how the proposed program would avoid duplication.
- We note that, while the PFD describes objectives and outcomes that are in line with the Minamata Convention (e.g., formalization of the ASGM sector, regulating mercury trade, promoting the reduction of emissions and releases from ASGM, prevention of exposure to vulnerable populations), there are few details provided on how these objectives would be attained and how the proposed 50 ton reduction in mercury emissions would be achieved. Please elaborate.

- In particular, the outcome of *increased number of miners using non-mercury methods* is a valid goal and is in line with the UNEP ASGM Guidance; however, it is unclear how this outcome will be achieved based on the information provided. In addition, we note that the financing for this activity is added in with the financing for regulatory requirements for post mine closure rehabilitation, making it difficult to determine what portion of funds would be spent on each outcome. Please clarify.
- Canada requests that the proposal include climate change adaptation and mitigation considerations, especially in view of opportunities for cleaner technologies in the ASGM sector, use of reclaimed lands, and the effects of the mining sector on carbon sequestering ecosystems, such as forests.
- In general, there appears to be an over reliance on strategy and plan development, and a top-down approach across the proposed projects. In Canada’s experience with ASGM communities, significant effort needs to be put into stakeholder engagement and mobilization as artisanal miners are not homogeneous and tend to operate in areas of high informality and/or illegality. Long and sustained engagement is required to gain trust. Canada requests that the program have more direct interventions with ASGM miners at the community level. Further, to improve capacity, Component 3 should be strengthened to include more human resources and local level training.
- Related to the comment above, the following statement may be misleading: “P.21 Government resources are scarce, but political will (including the will to prosecute, and a newfound coordination and cooperation among the various national agencies in-country and across borders) will be the linchpin of success in designing this program”. The capacity in the targeted countries is limited. Particularly, the capacity to prepare and prosecute thousands of cases is non-existent in Ghana, and with elections in 2016, the government is not willing to address ASGM issues. Please clarify the statement and ensure the proposal reflects current political situations in the targeted countries.
- In the document, it is unclear how the projects will deal with cross-border issues as only the participating countries of Kenya and Tanzania share borders, whereas Ghana, Senegal and Zambia have no neighbouring countries participating in the initiative. Please clarify how the program will develop sub-national collaboration platforms between the target countries and neighbouring states, including as the program involves illegal migration of artisanal miners.
- While improving environmental management in post-consumer mineral and metal salvage and recycling is a laudable approach, Canada has concerns that informal urban waste recycling communities will be difficult to engage with, when compared to ASGM communities. Technical challenges to improving recycling techniques and regional/global e-waste trade dynamics are enormous, and it should be made clear in the program document how this will be effectively dealt with.
- The proposal should make a clearer link between the two types of informal economic communities (ASGM/urban waste recycling communities), as well as their likely geographic situation (urban/rural). Similarly, given that the proposal includes a strong

emphasis on building government capacity for regulation and enforcement, while recognizing that there are limited financing options for remediation of degraded sites, there should be clear subnational and municipal engagement strategies included.

- Please clarify the following statement: “The component will attempt to support countries to address perception relating to mercury exposure, which includes unsafe practices (Mine Shafts etc.)”, given that all mercury use and management happens above ground and not in mine shafts.
- In terms of the proposed child projects, they appear to be, in general, very costly, when judged against the outcomes and indicators. As well, costing for sustainability of government regulatory and enforcement actions and additional large-scale remediation is unclear. Canada requests clarification on the costing, with justification included.
- Please see comments on specific projects below.

Comments by project:

Tanzania:

- We note that the Tanzania project proposes Phytoremediation and mechanical technologies to lessen the impact of mercury. We wish to underscore that, focusing on one as yet unproven method of remediating contaminated sites may not be the best use of GEF funds at this time, given that guidance will be developed under the Minamata Convention on managing contaminated sites to determine best practices for remediation. Work on this guidance development is presently in early stages. To improve the project, Canada proposes that the alternatives are carefully studied and included in the proposal, which will help miners’ confidence in the proposed intervention and future interventions.
 - For example, one alternative is that interventions could focus on mercury reduction and recovery in order to address management issues during processing and burning of amalgam. To address potential site legacies, techniques such as phytoremediation, water containment, and eventual filling should be further studied, based on biophysical and local context.

Component 1:

- ❖ Canada recommends focusing on areas that can make an impact at the country level. The goal of strengthening environmental monitoring services by inspections offices is sound. However, the objective of putting in systems for regulating the mercury trade will need to be developed through implementation of the Minamata Convention.

Component 2:

- ❖ The goal of supporting the efforts of the Government of Tanzania to formalise the ASGM sector is sound and reflects the objectives set out in the ASGM article in Minamata Convention. The objective of collaborating with local manufacturers on lower cost mercury management equipment is also sound. To improve this component, Canada suggests that the additional objective

related to rehabilitation of 2-3 pilot abandoned mines be removed as they rely on unproven methods.

Component 3:

- ❖ Support to the Government of Tanzania to strengthen policy and regulatory frameworks should include a reference to the development of a National Action Plan to implement the requirements of the Minamata Convention.

Ghana

- Overall, the project proposal contains appropriate objectives that aim to address areas of urgent need in Ghana. That said, there is also a strong need to for capacity-building in Ghana, including through training.
 - Canada requests that the project have more direct interventions with ASGM miners at the community level, particularly as most of ASGM miners are illegal. In Ghana, when ASGM-related projects are licensed (through due presentation and approval of the environmental assessment and environmental management plan), there is no follow up on the implementation of environmental instruments due to low capacity at the Environmental Protection Agency. In such a context, even if inspection protocols or other tools are developed/strengthened, their implementation is difficult, given the lack of human resources. Given this, component 3 should be strengthened to include more local level training.

✓ Germany's Comments

Germany has objections against this PIFs in its current form and requests that certain requirements are fulfilled before PIF approval:

- Germany would like to underline that we **welcome the programme proposal** in general, especially its regional approach and synergistic character while proposing country-specific measures, serving the achievement of several MEAs and respecting the great interlinkage between sound chemicals management and environmental and human health. We would therefore welcome a revised version of the programme by October this year.
- Germany agrees with the majority of the concerns shared by the STAP review, Switzerland and the US. Already in its current status, including 5 African countries, the program proposal lacks coherence, this should be resolved before adding more UN regions to the project.

Germany's major concerns are

- a high risk of duplication due to insufficient display of how the programme will integrate experiences already made by projects in the region and how it will complement already ongoing or shortly starting/planned activities, including those supported/executed by the Basel- and Stockholm-Secretariat; especially the insufficient consideration of collaboration with the Basel Secretariat and other ongoing activities concerning e-waste;

- the lack of clarity about how the project will be related to the chemicals management component of the PMEH (Pollution Management and Environmental Health) - Initiative by the World Bank (link is mentioned, but not elaborated);
- the lack of coherence between the set objectives of the child projects and the overall objective as well as the insufficient display of how the child projects respect trends in environmental health;
- the strong focus on end-of-pipe-solutions without sufficient consideration of upstream causalities, as pointed out in the STAP review;
- a seemingly low cost-efficiency as pointed out very well by the comments provided by Switzerland;
- the lacking integration of Customs in the measures aimed at reduction of mercury emissions.

**43. Madagascar: S3MR Sustainable Management of Madagascar's Marine Resources
WWF-US/World Bank - GEF ID = 9433**

✓ **Germany's Comments**

Germany approves this PIF 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:

- During further project preparation, please note taking into account that there will be no support through German GIZ in coastal Small-Scale Fisheries, as mentioned in the project document in the “Baseline” paragraph (p. 10) and under the “Sustainability Strategy 1”. A project appraisal mission in March 2016 decided to plan an inland aquaculture approach instead.

✓ **USA's Comments**

- The project lists as a partner the “Ministry of Environment, Ecology, Oceans and Forests” (along with the Ministry of Living Marine Resources and Fisheries). As a result of the recent cabinet reshuffle in Madagascar, that Ministry has now been renamed the “Ministry of Environment, Ecology and Forests” and as such, that Ministry no longer has responsibility with regard to Oceans. Instead, a separate, cabinet-level position has been established within the Ministry of Living Marine Resources and Fisheries. That position is the Secretary of State on behalf of the Ministry of Living Marine Resources and Fisheries responsible for the sea, with incumbent Leonie Ylenia Randrianarisoa. The Program Framework should be revised accordingly, and financing previously allocated to the Ministry of Environment should probably be re-allocated to the Ministry of Fisheries.

