

16th May 2013

Finnish comments to document: Draft GEF-6 Programming Directions

The document is a good first draft and a good basis for discussion.

Finland has been and is strongly supporting synergetic approaches; the step of developing a sustainable forest management program in the GEF5 negotiations was an important one. This multifocal area approach, which also according to the OPS5 is an emerging modality in GEF programming, should be strengthened. Besides the traditional Rio Convention related focal areas there are possibilities to provide synergies through e.g. combining financing through biodiversity and international waters focal areas. These opportunities for synergies between different focal areas or between different goals within a focal area should be used whenever possible.

As another general comment, we would like to acknowledge the progress made by the GEF in including the gender approach to its project programming. This can be seen also in the draft programming document here and there, and we encourage the GEF to continue to take into account the special needs and expertise of both women and men in an integrated manner.

Thirdly, we have noted that climate change has been broadly taken into account in different focal area strategies; this is a good start but should be further strengthened. We propose taking climate sustainability as a cross cutting issue throughout the GEF programming.

Comments on focal area/thematic strategies:

Climate change:

- We welcome that the possibilities for synergies are presented in relation to mitigation and adaptation as well as more broadly in the document. As stated above we encourage continuing with this synergetic approach.
- We commend the focal area's overall goal of mainstreaming climate mitigation planning and policies into countries' strategic decision making in order to move towards reduced emissions and low-carbon development paths. The three objectives under the focal area: 1. Promote innovation and technology transfer; 2. Demonstrate systemic impacts of mitigation options; and 3. Foster enabling conditions to mainstream mitigation concerns; are a good starting point for further work.
- What comes to the GCF we would like to point out, that we need to follow closely the work done by the Board and take the progress made into account as needed in the GEF climate change focal area strategy development. However, at the moment it seems appropriate not to make too big changes for this replenishment round, but secure now the funding to the mitigation activities in the developing countries and review the situation during the seventh replenishment negotiations.

Biodiversity:

- The CBD's Aichi Targets constitute the overall framework for the implementation of the CBD and this is well reflected in the biodiversity focal area of the draft programming directions. It is important to outline the relevance of the Strategic plan and its Aichi Targets for the entire family of biodiversity-related MEAs in the GEF-6 programming directions.
- Enhancing synergies among MEAs is a key for achieving efficiency and effectiveness in the delivery of the objectives of the conventions. The programming directions do not adequately address the need for enhancing synergies and coherence among biodiversity-related MEAs taking into account recent political commitments calling for this and the urgent and apparent need to find more efficient and effective ways to address to accelerating pace of biodiversity loss and ecosystem degradation. GEF should support the work in enhancing synergies among the MEAs in generally but also in relation to the biodiversity-related conventions, inter alia, through facilitating the operationalization of IPBES to serve biodiversity conventions as a whole in accordance with its mandate and rules. Furthermore, the National Biodiversity Strategies and Action Plans (NBSAPs) form a key instrument to support the implementation of the CBD, but also other biodiversity MEAs have through recent COP decisions adopted NBSAPs as an overarching framework for incorporating their objectives and actions. To this end, the GEF-6 programming directions should provide more emphasis to the formulation and implementation of NBSAPs and with particular emphasis of promoting NBSAPs as synergistic frameworks for the implementation of the biodiversity-related MEAs.
- However, in relation to the Nagoya Protocol and the Nagoya Protocol Implementation Fund (NPIF), we think it might be worth considering whether it would be feasible to include all of the Nagoya Protocol goals to the biodiversity focal area strategy in GEF6, since the main trust fund provides opportunities to synergies and also contributes to the fight against fragmentation of aid, and following the agreed principle that these kind of standing funds should be interim in nature.

International Waters

- The Programme areas in the GEF international Waters focal area strategy are relevant and address the future challenges related to water protection and management. It is positive, that also ground water is part of the programme. Finland underlines the importance to link these activities to the implementation of global water commitments, such as MDG 2015 goals, outcome of Rio +20 (including the recommendations related to oceans and links to food security) and development of the post 2015 goals where water should be one important thematic area.
- We support the focus of the Strategy to promote transboundary water management. It is important to support both a long-term political dialogue as well as demonstration scale investments on local and/or national level. Expanded collaboration with the global UN

Economic Commission for Europe (ECE) Water Convention can provide new opportunities.

- It is anticipated that also another global treaty regime – the United Nations Watercourses Convention (UNWC) – will be in force in the near future, hopefully by the end of 2013. The UNWC is a framework treaty that codifies the principles of customary international water law. It governs the use of international watercourses and sets the basis for bilateral and regional transboundary water agreements. The Convention has already influenced many regional agreements, such as the SADC Protocol. We propose that the GEF Strategy would have reference to this Convention, too, as many countries use provisions of this Convention when drafting regional and bilateral agreements.
- Furthermore, the Ramsar Convention on Wetlands is of critical importance for securing the conservation and wise-use of wetlands and water resources, including freshwater and saline inland waters and marine waters up to a depth of 6 meters. The Ramsar Convention is of critical importance to securing human well-being through improved ecosystem services, inter alia, by providing flood regulation and shelter belts from increasing storms. The objectives of the convention should be better reflected in the International Waters Focal area and the Biodiversity Focal area, ideally through a multi-focal approach.
- Globally over 80 % of collected and discharged wastewater is not treated. Quite clearly this will be one cause of the coming water crises we are facing because the limited water resources are further decreasing as a result of water pollution. Long-term target setting and proactive strategies for pollution reduction from different sectors is a key issue. GEF Strategy could include more focus on the pollution reduction.

Chemicals strategy

- The GEF6 Chemicals strategy responds to the messages from the multilateral processes. It also emphasizes in many ways the general development towards increased synergies in the implementation of MEAs on chemicals and wastes. This approach is in line with a policy that Finland has consistently promoted for many years. The strategy seems thus to enable financing of synergistic projects concerning also other conventions and non-legally binding instruments (e.g. SAICM) than the conventions where the GEF serves as the principal financial mechanism (Stockholm Convention on Persistent Organic Pollutants (POP) and the upcoming Minamata Convention on mercury).
- We agree with the three objectives chosen for the chemicals and waste strategy but believe closer consideration is needed in relation to the programmes and indicators. There are some areas where the programmes do not seem to cover all recommendable areas of work.
 - o We are generally satisfied on the way that the POPs issues are covered in the strategy and the programs. During the GEF5 period, however, 10 new POPs

have been listed. It is important that this expansion of the scope of the convention is acknowledged.

- In 2006 governments adopted the SAICM in an attempt to harmonise global management of harmful chemicals and waste through a cradle to grave approach. The GEF has provided support to some SAICM activities. There are recent international decisions for example under Rio +20 and the UN Governing Council 2013 to strengthen SAICM to meet the WSD goal of 2020 and an increase in funding would be helpful. As the GEF 6 covers most of the time between now and 2020, a broader focus on global benefits within the context of SAICM is needed, we believe this being especially important in the context of objective 1.
 - Mercury Minamata Convention has recently been negotiated to control the use of mercury. The Convention selected the GEF as the financial mechanism. In the list of priority funding (p.117) only activities enabling ratification of the Minamata convention are listed. The list could be expanded to cover rapid assessments, development of specific legislation, activities related to artisanal small scale gold mining (ASGM) and capacity building activities. Also under objective 2 we would like to see a more specific mentioning of mercury. There could be a programme covering mercury related enabling activities (see suggested activities above).
 - To broaden the scope for synergistic approaches between conventions some attention should be paid to investigate and possibly support synergistic measures to phase-out or regulate the use of HFCs (hydrofluorocarbons). Increasing amounts of HFCs are used as refrigerants to replace chemicals that are depleting the stratospheric ozone layer. On the other hand HFCs have a substantial global-warming potential. HFCs have so far not been regulated in the agreements on climate change and there is not any agreement on inclusion of HFCs into the scope of the Montreal protocol either, because HFCs do not contribute to ozone depletion. Although there is a broad acknowledgment of this problem the solution would need cooperation between the Montreal protocol and the international processes dealing with climate change. Financing in this area would create a multi-focal area approach between chemicals and climate.
- The main goal of the GEF is to support Global Environmental Benefits which usually means that support is allocated to bigger developing countries, therefore, as this is especially important in relation to sustainable chemicals management it is praiseworthy that in the chemicals strategy the special needs of the LDCs and SIDS have been taken into account.

Sustainable Forest Management Strategy

- The SFM program that was developed for the GEF5 is, as it should, included again in the GEF6 programming. The role of sustainable forest management in sustainable development and poverty alleviation is widely recognized. SFM has also tools for

preventing land degradation through afforestation and reforestation. Therefore it is important to support the implementation of SMF in GEF, and especially support the capacity building in those countries that do not yet have proper framework for implementing SMF.

- By focusing on clear goals the effectiveness of funding can be increased. The four objectives presented in the draft working paper cover well the important elements.
- We would also like to refer to the UNFF 10th Session resolution (WG2) on means of implementation for SFM, in particular the part directly addressed to the GEF. As the UNFF resolution is a consensus statement by its Member States and does not prejudice the outcome of GEF6 replenishment negotiations, we suggest that the messages contained therein be taken into consideration in full as other parts of the resolution are also addressed to the GEF implementing and executing agencies and Parties to the GEF.

An Integrated Approach to the Global Environmental Commons in Support of Sustainable Development

- As an idea the integrated approach is good and interesting, however, we would need further clarification what the goals and actions would be in real terms and how does this fit into the GEF Programming as a whole and how it would work in relation to different focal area strategies. It could be worth considering whether some of these ideas could fit into the existing focal areas instead of creating new programme(s).
- We have also some specific comments:
 - o Forests: The two signature programmes concerning forests focus on aspects that are linked with CO2 emissions and are therefore in a central role in mitigating climate change. Could some of these elements be included in the SFM strategy?
 - o Sustainable Cities: The paragraphs on sustainable cities and harnessing local action for global commons make a clear case for the need to have a signature program on this theme. The challenges faced by cities, as well as, the impacts that cities will have on global commons are presented in a comprehensive manner. The two-fold approach of 1) retrofitting existing urban systems, and 2) promoting policy and strategy measures to facilitate new urban development in a sustainable fashion, has merit.
 - With regard to the component on integrated urban design we would like to point out that policy and governance support under this theme would not only lead to sustainable development with resilience and sound ecosystem management. In addition, a central outcome could be the reduction of greenhouse gases through improved policies, plans and designs for more compact, better integrated and connected cities.

- If the sustainable cities initiatives would be supported the focus should be on developing planned city extension methodologies to guide the sustainable development of cities experiencing rapid urban growth, to enhance access to basic urban services (water, sanitation, energy, mobility, waste management and drainage)¹, and to create an energy efficient, safe and healthy built environment.

¹ as stated in Governing Council resolution (HSP/GC/24/L.3) on strengthening UN Habitat's work on urban basic services.