

Finnish comments to document: Draft GEF-6 Programming Directions (GEF/R.6/13)

Finland considers this revised version to be nicely improved and as such a good basis for further discussions. However, in the end also the level of replenishment will effect on the programming, therefore at this point we will only highlight some points we consider important while trying not to repeat the comments made in May¹.

As a first general point we would like to commend the strengthened synergetic approach presented in the document. Furthermore we note that as we move forward prioritizing support to different goals and programs should be guided by the obligations coming from the Convention. And finally we would like to point out that in line with the draft policy recommendations the gender approach should be more visible, as applicable, in the draft programming document.

Specific comments on focal area strategies and signature programs:

Signature Programs

- We support the idea of seeking synergies and thinking holistically. We also find it necessary to understand the underlying drivers of environmental degradation. However, from our point of view the added value of the GEF is its focus on global environmental benefits and as such supporting the implementation of the MEAs. It would be helpful to further develop the conceptual link between the GEF focal areas, the multi focal area programs and the new thematical signatory programs as a starting point for a selection of potential pilot programs in this category. Piloting of this program concept during GEF6 is necessary in order to get experiences and lessons learned for future discussions and decisions. However, at the same time we need to secure funding for the basic obligations coming from the conventions for which the GEF serves as a financial mechanism. In order to enhance impact the GEF should avoid dispersion of its investments.
- We are rather contented with the way that partnerships are included in the GEF-6 programming. There is an opportunity to achieve some of the aims of the signature programs with innovative and sustainable investments in partnerships.

Climate change:

- The inclusion of the short-lived climate forcers is important from our point of view.
- We acknowledge the inclusion of the CTCN support, as appropriate, as well as the inclusion of the Climate Smart Agriculture (this applies also to the focal area strategy on land degradation).
- In terms of resources, priority should be given to those programs that correspond most directly to COP obligations and guidance. In practice this means giving priority in particular to 3rd strategic aim, the 5th subprogram and the set-asides.

Biodiversity:

- We commend the fact that the NBSAPs should be noted in and guiding the biodiversity related project plans, we consider them the main tool for countries to implement biodiversity related MEAs.

¹ <http://www.thegef.org/gef/sites/thegef.org/files/documents/Finland.pdf>

- It is also good that piloting CITES related project implementation is included to programming as well as supporting the work of the IPBES from the FAS as applicable.
- 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:

- We believe the effective use of water could be better included to the international waters strategy. It is often the key element to sustainable use of water resources.
- 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. 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.

Chemicals strategy:

- We believe this version now takes better into account the recent developments under chemical MEAs (including mercury negotiations and additional POPs).
- We commend the inclusion of the HCFCs, in this respect we believe it is especially important to align the guidance with the Multilateral Fund.

Sustainable Forest Management Strategy

- We note with satisfaction that synergies will be sought with organizations outside the GEF such as the Forest Carbon Partnership Facility. It is important the GEF does not duplicate the work done elsewhere but builds on it and complements it.
- We consider important that also here the special needs of the SIDS and LDCs are noted and that a possibility to implement regional and global projects is put forward.

Small Grants Programme

- We support the continuation of the SGP, it has proved to be one of the best inventions of the GEF. However, at this point without the final OPS report and with the given information we are a bit hesitant to make such radical changes as proposed in the document.