

Sixth GEF Replenishment – Programming Directions
Comments from France, 03/05/2013

1. Biodiversity

- The project contains the key issues identified by the CBD as part of the Strategic Plan and the Aichi Targets and the GEF is in line with global policy on biodiversity.

- The implementation of Aichi Target 20 (mobilization of financial resources for biodiversity) requires a rigorous accounting of resources mobilized for biodiversity. In this context, it would be useful to clarify the methodology for tracking co-financing and accounting of financial resources from the private sector and other stakeholders in civil society.

- Clearer links should be established for the implementation of actions under the Global Strategy for Plant Conservation.

- With regard to marine and coastal biodiversity, the emphasis could be placed on the funding of training and capacity building on EBSA (Decision XI/5). On protected areas, better coordination can be found between Aichi Target 11 and the other objectives of the CBD Strategic Plan Optimization (optimization of GEF contribution).

- Concerning the Nagoya Protocol (pages 22 and 23), points 74.c, 76 and 77, the terminology "indigenous peoples" is used. Given the discussions at the last COP on this and the next International Group on Article 8j in October 2013, it is appropriate that the terminology "indigenous and local communities" be used by the CBD and the Nagoya Protocol, instead of "indigenous peoples".

2. Chemicals

- The proposed strategy appears to be relevant at this stage, as well as the long-term goal of "significantly reducing the exposure of humans and the environment to hazardous materials and waste" and the three strategic objectives.

- Clarification is needed on innovative programming options (p.119 and p.131 Appendix 2): even though this approach seems interesting to raise additional funds, we question the funding on the basis of performance. This approach can be beneficial for projects where measurement and verification are possible (such as the elimination of certain substances) and/or when a country has set numerical targets to reduce emissions. However, these funds should be based on accurate assessments of the existent waste that are not always available. In programming terms, the amount that could represent this type of project in the "Chemicals and Waste" portfolio could be clarified.

3. Land Degradation

General Comments:

- The strategy should take into account the recommendations of the Committee in charge of the review of the implementation of the UNCCD (CRIC11), and in particular the difficulties experienced by countries in accessing GEF funding to support the production of national reports in 2012 (note that it has resulted in a significant drop in the rate of "reporting" to the Convention, calling into question the relevance of the analysis of information provided by the parties).
- GEF support to the implementation of the strategic objectives of the UNCCD will also focus on the accuracy of the impact of land degradation indicators to strengthen the implementation of the Convention and its evaluation.

Specific Comments:

- On page 96 § 23 we propose the following addition (in bold): "*The goal of the land degradation focal area is to contribute to preventing, arresting and reversing current global trends in land degradation, specifically desertification and deforestation*".
- There should be more of a reference to oasis systems and the importance of preserving, as recalled in "The Future we want" statement.

4. International Waters

General Comments:

- France supports the merger with the water of the UN ECE Convention (also voted during the 6th MOP in Rome in November 2012), but recognizes that the ongoing construction of laws and institutional framework for transboundary waters does not permit rapid progress.
- The document could specify how the projects in this focal area will be coordinated with ISARM (Internationally Shared Aquifer Resources Management) of UNESCO regarding aquifers.
- Taking into account the water/security - food/energy nexus and the issue of conflict of uses should be addressed on the basis of the integrated management of transboundary water resources.
- The document could do more to highlight regional and local issues. For example, if the Mediterranean is already facing water stress as well as the Sahel, is more a matter of good management as a lack of resources.

- In addition, issues related to the degradation of the quality of inland waters, particularly in relation to eutrophication and chemical pollutants are not specifically addressed.

- On the question of the oceans, the relationship between Objective 3 of the theme and the signature program remains to be defined in order to avoid the risk of duplication of projects. Reducing pollution by nutrients causing hypoxia in the oceans relates primarily to the integrated management of coastal areas, especially in agriculture. This part, as well as that relating to the degradation of marine habitats and associated ecosystems, deserve a multifocal approach, in connection with biodiversity, which rely on approaches such as "contract of the bays." Finally, the restoration of fisheries, in addition to the proposed actions (the fight against illegal fishing, economic management, incentives for sustainable fishing) should include limiting catch and release. The concept of adapting fisheries to the needs of the sector and market opportunities, as presented in the signature program is an interesting approach, which will first be taken to minimize waste, but also to integrate economic and development spectrums, which is expected to mobilize funding and greater involvement of the private sector, who will find some benefit.

Specific Comments:

- It is stated on page 66 in section 4 that "There are numerous international conventions, treaties, and agreements on international waters." However, the Convention on the Transboundary Watercourses and International Lakes, which came into force in 1992 in the framework of the Economic Commission for Europe of the United Nations (UNECE), is currently the only international legal instrument (although it is limited to European region) of reference in relation to international water governance.

The New York Convention or the "1997 Convention" negotiated under the United Nations Law of the uses of international watercourses for purposes other than navigation exists but is not yet effective. In a context where it seems necessary to strengthen international governance in the field of water, we propose the following additions to support activities related to the ratification and implementation of the 1997 Convention:

- On page 73, in paragraph 24, the relationship is not necessarily clear from the Globallast IMO Convention on ballast water management and "«new opportunities for expanded collaboration with the soon-to-become global UN Economic Commission for Europe (ECE) Water Convention". We propose the following wording to replace it (additions in bold): *"Building on the GEF International Waters success in support to ratification of **relevant conventions such as Globallast Convention, Anti-Fouling Convention, engages activities to support the reinforcement of global governance on water trough UN Economic Commission for Europe (ECE) Water Convention and the New York Convention on the law of the non-navigational uses of international watercourses**"*.

- With regard to paragraph 38 on page 76 which deals with governance, we propose the following formulation (additions in bold): *« GEF-6 will focus support on more effective conjunctive management and sustainable use of transboundary surface and groundwater resources, together with associated ecosystems and the services they provide. Partly due to lack of comprehensive information on groundwater resources and to the 'invisible nature' of*

groundwater, governance of this resource remains in an incipient stage when compared with that for surface water. Therefore in order to reinforce international governance on water, GEF-6 support will create the enabling environment and necessary capacity to achieve consistency of water governance frameworks for river and connected groundwater basins including through the ratification activities and implementation of the New York Convention on the law of non-navigational uses of international watercourses. This will become increasingly important as groundwater is used for irrigation for expanding food production and, on the other hand, provides a buffer to sustain water supplies in times of drought”.

5. **Climate Change Mitigation Strategy**

- The document clearly identifies the areas in which the GEF has an added value: supporting the reporting and evaluation of mitigation actions, including through the funding of National Communications and biennial reports, the search for synergies with the other focal areas and support for innovation (upstream of other instruments).

- It is a priority for France to clarify the role of the GEF in the light of (i) the highly fragmented and sub-optimal global financial architecture today and (ii) the creation of the Green Climate Fund. It is important to avoid replication and seek complementarity of institutional structures. In this context, we will closely monitor the work of the Business Model Framework of the Green Climate Fund, which will allow us to have concrete evidence and enable us to make more detailed comments on the strategic positioning of the GEF and its programming as well as long-term strategy with regard to climate change. The various papers requested from the Secretariat during the first Replenishment Meeting for GEF-6 will also inform the French position on these issues. In anticipation of these elements, however, we can formulate the following note: for programs related to innovation and technology transfer, there is no reference to the Technology Mechanism established under the UNFCCC or the arm of it the "Climate Technology Center and Network (CTCN)." Therefore, the decisions of the UNFCCC call on the GEF, under its mandate that is still underway for the implementation of the Poznan Strategic Program, to support the operationalization of the Technology Mechanism and CTCN.

6. **Strategy for Sustainable Forest Management**

General Comments:

- In general, the strategy and targets identified cover the priority areas. The approach developed corresponds to the contents of the national group of tropical forests: a landscape approach, restoration, PSE, governance and capacity building, focus on the causes of deforestation, etc.

- The GEF strategy will try to incorporate as much as possible the conclusions and recommendations adopted by the UNFF 10.

- In addition, the document repeatedly stresses the importance of forests for mitigation of climate change, forest conservation and the fight against land degradation, but mentions very little on adaptation to climate change (indirectly in paragraph 4, directly in paragraphs 21 and 36 - lacks in Objectives 2 and 3 in particular).

Specific Comments:

- Page 135 on the causes of deforestation and forest degradation: the text speaks only of agriculture, which is certainly the most important cause of deforestation. It would be better to also name other causes (mining, illegal logging, etc.), which are also cited in the rest of the document.

- Pages 139 and 140: we stress the importance of the GEF in strengthening its support to SIDS and LFCCs. The latest study of the special working group on financing sustainable management of the Collaborative Partnership on Forests, prepared in advance of the UNFF 10, mentions the small amount of funding received by these countries compared to countries with high forest cover (better off in REDD + funding). However, if these countries (SIDS and LFCCs) have less mitigation potential, forests are very important from the perspective of biodiversity conservation, the fight against land degradation and climate change adaptation.

- Regarding the first objective, the issue of securing land rights is never raised (it is for objective 2). However, to address the causes of deforestation, especially in agriculture, it is important to consider this issue, not only for the rights to the forest land, but also for the rights to agricultural land (in logic of the landscape approach advocated in the introduction).

- In addition, paragraph 27 says that we must work in conjunction with the process of preparing REDD + strategies, which is a good thing, but it is also necessary to work in conjunction with national forest programs developed by countries and national biodiversity strategies or action plans, as well as adaptation plans.

- Finally, in addition to working to reduce deforestation and forest protection of high conservation value, it is important to fight against the "fragmentation" of forests (this term is at no time mentioned in the document).

- With regard to the second and third objectives, it is regrettable that there is no question of adaptation to climate change.

- On the options for managing the GEF-6 SFM Portfolio, it is unfortunate that the issue of SIDS and LFCCs not be reproduced in paragraph 49. The GEF had nevertheless identified (paragraph 20d) that the coupling of the incentive to the STAR actually penalizes countries with modest STAR allocations and that the implementation of regional actions were particularly important for SIDS and LFCCs.

- Finally, regarding the schedule, some of the proposed indicators are qualitative and are therefore difficult to evaluate.

8. Signature programs

Regarding signature programs proposed by the Secretariat, we will wait for the clarifying elements requested at the first Replenishment Meeting for GEF-6 before making detailed comments.