



GEF NGO NETWORK COMMENTS

DRAFT GEF-6 PROGRAMMING DIRECTIONS (document GEF/R.6/07, March 08, 2013) 30 April 2013

Overall Comments

The GEF NGO Network is happy to see the GEF 6 Programming Directions Document and the various focal area strategies. We welcome the strategic thinking and innovation in the development of the programme including the proposed introduction of signature programmes.

We are happy that Civil society have been recognized as key partners in some programmes - but are concerned that this is not well articulated in others. We propose consideration of inclusion of a new signature programme related to large scale public mobilization in achieving global environmental goals.

We believe that specific mechanisms should be put in place in GEF 6 to address the serious decline in CSO led projects in GEF 4 and 5 as an inadvertent impact of the RAF/STAR. This should be addressed both in the programming directions as well as specific GEF 6 mechanisms.

Biodiversity Focal Area Strategy (page 3-34)

General comments

1. We welcome the approach of the BD FA Strategy, which contributes to achieving the CBD's Strategic Plan and a set of Aichi Targets, based on the document, which explicitly states „BD strategy is composed of 11 programs that directly contribute to achieving the objective...contribute to directly achieving 15 of the 20 Aichi Targets In order to make significant steps to achieve the Aichi Targets by 2020, the GEF-6 period is a critical phase to support and assist eligible countries with appropriate programming guidance and additional funding.
2. UNEP/CBD/COP/DEC/XI/5 *requests* the Global Environment Facility (GEF) to implement the four-year outcome-oriented framework of programme priorities for the period 2014-2018, noting that the Strategic Plan and its Aichi Targets are the key guideline. Hence, the GEF programmes should be grouped according to the Strategic Plan's Strategic Goals A-E in order to clearly and readily show GEF's contribution in achieving these goals.
3. UNEP/CBD/COP/DEC/XI/5 *“Calls upon* the Global Environment Facility to avoid additional and lengthy processes and to utilize existing NBSAPs as the basis for GEF 6 determination of needs based priorities.” We noticed the documents did not respond to

NBSAPs priorities, many of which have been revised in GEF-5. (compare Annex to Dec XI/5: Additional strategic considerations: 3. The GEF-6 biodiversity strategy should take into account that the Aichi Biodiversity Targets provide a flexible basis for Parties which can be adapted, taking into account different national circumstances and capabilities, including in revised national biodiversity strategies and action plans.)

4. The GEF programme composition does not respond to Aichi Targets 14 and 15 on ecosystem services, although e.g. T 15 on restoring 15% of degraded habitats is one of CBD's priorities and will also serve climate mitigation. Decision XI/16 on ecosystem restoration was adopted to highlight the importance of ecosystems: "*Further noting* that ecosystem restoration will play a critical role in achieving the Strategic Plan for Biodiversity 2011–2020, including the conservation of habitats and species". Programmatic approaches for the GEF-6 have been provided by the expert group (see UNEP/CBD/COP/11/INF/35. 20 September, 2012).
5. A program on Aichi Target #1 (awareness raising) is missing to support countries with implementing their CEPA Actions Plans (Communication, Education and Public Awareness) in order to better serve the implementation of other GEF programs and the entire CBD Strategic Plan. It is not enough that awareness-raising as identified in Target 1 will be supported as an element of GEF projects and programs as appropriate, but not as a stand-alone activity. A strong collaboration with UNESCO is recommended. Concrete proposals how to shape GEF actions on Target #1 have been provided by the expert group (compare UNEP/CBD/COP/11/INF/35. 20 September, 2012).

Specific comments on GEF's BD FA Strategy programme portfolio

1. With Programmes #1 and # 2, the GEF continues its successful engagement in protected area work and establishing ecological infrastructure as the backbone of CBD's biodiversity conservation strategy, including developing financial mechanisms.
2. Programme # 4 is very important because it highlights the need to take early action on wildlife crime.
3. Programme # 7 on coral reefs should be a cornerstone of the GEF-6 BD actions.
4. Programme # 9 on implementing the Nagoya Protocol is crucial for the GEF-6 period.
5. The BD and ES valuation programme #10 is strongly needed to move this issue forward at the national level and mainstream BD into the finance sector and decision-making. Actions on how to integrate valuation into national policies should be included.
6. Programme # 11 is very focused on addressing deforestation as a major driver of BD loss. Actions described in para 92 to develop BD-friendly value chains and products are critical in that regard. Herewith, private sector involvement is essential.

CLIMATE CHANGE MITIGATION STRATEGY (PAGE 35-65)

General comments

With regards to climate change – we support the enhanced emphasis on LULUCF (Land use, land Use Change and Forestry) and agriculture; and also the proposed integrated approach for low carbon cities to link action to address both climate change and chemicals.

Although it is not discussed in the paper we do however feel that for GEF 6 the country allocations should be adjusted to reflect emissions related to agriculture, forestry and land use

(AFOLU) and not just industrial emissions as currently. This would enhance allocation to countries where AFOLU emissions are greater than Industrial emissions – which is the majority of GEF Recipient countries.

We also believe that some priority should be made to support the leadership of Least Developed Countries (LDCs) and Small Island Developing States (SIDS) in promoting low-carbon development strategies. Earlier this week LDCs highlighted their willingness to make significant reductions in their already low emissions. This should be supported.

Specific comments

1. Para 10, page 39, “A strong focus will also be placed on ensuring the sustainability of project outcomes beyond the project duration. In particular, the GEF will encourage countries and Agencies to develop innovative initiatives to ensure the sustainability of technical assistance provision and institutional capacity of stakeholders to unlock climate change mitigation impacts.”
COMMENT – To take into considerations the experience from the indigenous peoples.
2. Para 13, page 41 “The GEF-6 Climate Change Mitigation strategy supports technology transfer at several key stages, from the demonstration and deployment of innovative low-carbon technologies, towards their market diffusion and adoption.”
COMMENT – To add in “....adoption, implementation and scaling up.”
3. Para 14, Page 41 Programme 1 will consider all key sectors with mitigation potential , including energy efficiencyforestry
COMMENT – Add in “agriculture”
4. Para 25, page 44, (i) Innovative technologies and management practices successfully demonstrated, deployed, transferred and financed.
COMMENT – To add in “... financed and scaled up”
5. Para 25, page 44, (ii) Enabling policy, legal and regulatory frameworks and mechanisms created and put into place to accelerate low-carbon innovation, technology transfer, market diffusion and adoption.
COMMENT - included into development planning and relevant sectoral and investment plans and policies
6. Para 26, d. page 47, Outcome (i) Innovative, effective and efficient climate change mitigation policies adopted and enforced along with instruments that address their economic consequences.
COMMENT - are included in development planning,
7. Para 26, d, page 47 Outcome (ii) Awareness raised among governments and private investors regarding climate change related risks and opportunities conducive to more private investment in the low carbon economy.
COMMENT - and continuity of GEF initiated programs
8. Para 26, d, page 47 Indicators
COMMENT – To add into a new indicator, *iv. The share of projects that are sustainable beyond the project implementation period*
9. Para 31, page 48, Outcome (i) Sustainable urban policy, legal and regulatory frameworks adopted and enforced for low carbon urban development
COMMENT – are included in the development planning.

10. Para 32, page 49
COMMENT – Suggest to add an extra sentence after (IPCC 2007): “One of the largest emissions sources in the AFOLU Sector is from peatland drainage and degradation emitting an estimated 2.5 billion tones of CO₂/year from 0.03% of the land area.”
11. Para 33, iv
COMMENT – Suggest to add “and wetland loss” after deforestation.
12. Para 36, d, page 52, Indicator (i) Extent to which agriculture, forestry, and other land use policies and regulations are adopted and enforced
COMMENT – Also to take into consideration their sustainability
13. Para 36, d, page 53, Indicators:
COMMENT - Suggested additional indicator Area of peatlands and other wetlands managed to reduce emissions from drainage and fires
14. Annex 1 Para 3 a, Page 63.
COMMENT – ADD: “or rapid deforestation/wetland loss” after urban centres
15. Annex 1 Para 5
COMMENT – Add: “climate –smart” between sustainable and agriculture.

INTERNATIONAL WATER FOCAL AREA STRATEGY (pg 66-89)

1. Para 19, page 72, top paragraph, before the sentence: “GEF is uniquely positioned to be a catalyst for cooperation and bringing about transformational shifts in country cooperation and regional development”
COMMENT – To add in "The main goal is to strengthen cooperation among States in the field of sustainable use of water resources in order to increase the efficiency of co-management and use of transboundary water resources and water infrastructure, enhance the stability of water supply and implementation of innovative technologies."
 2. Para 20-28, to include the following: At the planning stage, GEF support comes from the fact that the States should endeavor to enhance cross-border co-operation in accordance with the key instruments of international law, including the UN Convention on the Protection and Use of Transboundary Watercourses and International Lakes and The Convention on the Law of Non-Navigational Uses of International Watercourses , which define the basic principles of transboundary rivers and their respective territories should use the transboundary rivers in an equitable and reasonable manner to prevent harm to other watercourse States.
- or
3. Para 27 include the following: "as well as to meet the requirements of UN Convention on the Protection and Use of Transboundary Watercourses and International Lakes and The Convention on the Law of Non-Navigational Uses of International Watercourses
 4. Para 29, page 74, on GEF support the participation of civil society.
COMMENT : This is not enough. One of the real mechanisms of public participation may be considered Public Councils created under different structures. We consider it appropriate to

add a mention of this. In particular in PROGRAM 1.1: "Foster cooperation for sustainable use of transboundary water systems and economic growth" in the "Outputs" to change as "# of regional institutions and Public councils for joint management of transboundary water body / and related resources established". Or give as a separate item. Support the development of public participation may be reflected in the indicators.

National and international institutions of water management demonstrated in practice inertia and sluggishness in solving the problems of water resources management, conservation and restoration of water bio ecosystems. In this regard, it should actively promote a radical increase awareness and public participation through NGOs and the public to actively influence the solution to the problems of rational use, conservation and restoration of water bio ecosystems. Knowledgeable and organized public today is a positive and effective factor in solving the above problems.

Experience in resolving water conflicts at various levels, within and between countries, shows the importance of continued participation in projects and negotiation the decision-makers, technical experts and civil society. Typical example:

Water as the main subject of discussions between Hungarians and Slovaks facilitated dialogue between the conflicting ethnic groups in the region. Dialogue ended with the agreement of the clean-up and management, as well as a number of joint projects, which are still being implemented. Sense of belonging and moral obligation of the action actually taken against the will of national governments, forcing the government to follow the decisions taken.

NGO activities may include the following: participation in joint committees, in the negotiations on water sharing and other cross-border issues, cooperation with NGOs in neighboring countries, participated in the drafting of legislation and agreements, conducting public awareness of companies. NGOs can assist in improving skills, share knowledge and experience, the development of cultural communication, possession of instruments of IWRM.

6. **COMMENT** – It is advisable to more clearly to focus on the support of GEF new modern approaches and models for the management of transboundary waters, in particular the widespread implementation of Water Evaluation And Planning System (WEAP); Technology of Alternative Dispute Resolution (ADR), etc.

LAND DEGRADATION (pg 90-108)

We support the approach in the Strategy for land degradation and the inclusion of land degradation as a signature programme. The prioritization of Africa is also supported. However we would like to encourage further consideration of addressing the degradation of wetlands – which have high biodiversity, play a critical role in climate regulation and provide life support services to many.

Page 100 para 29 (b) SLM for climate smart agriculture

We support this proposal but suggest to add: viii Modify Agricultural practices on organic soils

According to IPCC AR4 – one of the most cost effective emission reductions related to better agriculture management on organic or peat soils. These soils are also easily degraded by agricultural drainage which leads to subsidence and fires – a serious source of broader land and environmental degradation affecting water supply, flooding, agricultural productivity etc. Introduction of climate smart Best management practices can reduce degradation and enhance sustainability and reduce GHG emission.

CHEMICAL STRATEGY (Pg 109-133)

The GEF NGO Network is broadly happy with the Chemicals and waste strategy and the receptiveness of the GEF TAG to consider earlier inputs from the Network representative.

With regard to the support for CSO involvement we believe that it should not only be restricted to SGP funding - there should be reference to the option for Medium sized projects implemented by CSOs in the strategy. It would also be useful to highlight the value of capacity building and exchange of experience and lessons learned through use of regional or international networks.

Specific comments are as follows:

1. We believe that reference should not be made to retorts as an example for a possible technical solution for ASGM in Annex 2: Innovative Programming Options in the GEF-6 Chemicals and Waste Strategy. Part 2. Private sector partnerships.

Tests made by in Indonesia revealed high levels of mercury in the ASGM and gold shops area where retorts are applied. The levels of mercury in most of the goldshops were as high as 50 times the US EPA safe level of 1000 ngr/m3.

The retorts generally only capture 30-40% of the mercury vapor. The remaining is still evaporated to the air. The captured mercury will be condensed in a water bucket/container and can be used again for 2-3 times and then it will be disposed off with the tailings because the quality is downgraded.

Therefore using the retorts only delays the release of mercury to the environment. We believe that the best way to reduce mercury contamination in ASGM is stop using mercury in ASGM, apply non-mercury methods.

2. Page 120, Strategic Objective 1: Create the enabling conditions and environment to manage harmful chemicals and waste, second paragraph, the following sentence should be added:

“It will also encourage civil society involvement in national and sectoral policy development and monitoring of implementation to ensure broad recognition of public needs and requirements.”

3. PAGE 123 -In Strategic Objective 2: Program 2:

We want to ensure that safe alternatives and alternative techniques and practices are promoted for reducing harmful chemicals. Thus the word "safe" should be added to the following sentence: Deploy **safe** alternatives and alternative techniques and practices for reducing harmful chemicals.

In the same part, last sentence (before Outcomes) partnerships with civil society groups should be added:

Along with the necessary policy, economic and regulatory instruments, partnerships with the private sector, other economic and productive sectors **and civil society groups** will need to be developed to ensure capacity building and exchange of information and lessons learned.

Para 43, page 121: In Outcomes a new bullet point should be added:

- **Global demand for cleaner products increased**

4. In the part on Innovative programming options (para 31 and Annex 2) we are happy to see the proposed support for civil society initiatives to be included as part of the innovative programming options which will be utilized in implementing the three strategic objectives of the Chemical Strategy. However we believe that the text should be adjusted to include MSPs as well as SGP funding – possibly as follows:

In GEF-6, nongovernmental organizations can submit and receive approval for projects focused on elimination of hazardous chemicals and waste.

Partnership with this sector will be supported through GEF Small Grant Program (SGP) **and GEF Medium Size Project (MSP)** where a proportion of funding given to initiatives on chemicals and waste will be shared equally with other GEF SGP **and MSP** national priorities such as climate change and biodiversity.

INTEGRATED APPROACH TO THE GLOBAL ENVIRONMENT COMMONS IN SUPPORT OF SUSTAINABLE DEVELOPMENT (PG 153-165)

We welcome the proposal for Signature programmes but hope that further information can be provided on their scope and modality. Depending on the envisaged resource allocations – some proposed programmes may need to be further streamlined.

We believe that consideration could be made to including some aspects of cross cutting Capacity development in the signature programmes – such as mainstreaming global environment issues into national development and economic planning processes or Enhancing global civil society movements for large scale mobilization of community action to address the global environment.

CORPORATE PROGRAMMES (PG 166-180)

We strongly support the continuation and enhancement of the Country Support Programme (CSP) and cross cutting capacity development (CCCD). We believe that the proposed focus of CCCD to mainstream Global environment issues into national frameworks is a very strategic direction to enhance transformational change.

We also support the continued evolution of the Small Grants programme (SGP) to a more integrated approach with broadened partnerships. However a higher core allocation to the SGP is needed in GEF 6.