

Japan's Comments on Programming Documents (GEF/R.6/13)

October 4, 2013

We would like to express our appreciation for the secretariat's work to draft programming documents. We are pleased to provide our comments on them as follows:

Indicative Resource Envelopes for GEF6

- We welcome the proposed increase of resource allocation to the chemicals focal area, as it will be useful in enhancing the implementation of the new mercury convention.
- We understand that the proposed figures are meant to be illustrative at this stage and we should not try to identify too much firm implications out of them. That said, for the future deliverables, we would like to ask the secretariat to prepare a set of more realistic and carefully designed options that reflect internally and mutually consistent understandings on relative resource allocations among the focal areas as well as other key factors.

GEF6 Focal Area Strategies

Biodiversity

- The new strategy document clearly illustrates how GEF programs contribute to the Aichi targets, and we welcome this strategy.
- Program 7 (coral reef ecosystems) of page 22 is primarily to conserve coral reef ecosystems, not directly targeted to contribute to the sustainable use of marine resources brought by coral reef protection. Thus, we suggest this program be placed under objective 1 (protected area systems) rather than objective 3 (sustainable use).
- We propose to revise the scope of the Nagoya Protocol Implementation Fund stated in paragraph 81 of page 28 as follows, since the description in the programming document is narrowly described compared to the original scope of the Fund:
Nagoya Protocol Implementation Fund (NPIF) Support
81. The primary objective of the NPIF is to facilitate the early entry into force and create enabling conditions at national and regional levels for implementation of the Protocol. The Fund supports, among others, existing opportunities leading to ~~Projects funded through the NPIF will support~~ the development and implementation of ABS agreements between providers and users of genetic resources that include the three core key elements of the Nagoya Protocol on ABS: PIC, MAT, and Benefit Sharing Providers. (The following sentences remain the same.)
- As the output 10.1 (fully developed valuations of biodiversity and ecosystem services at national scale which have been incorporated into decision-making processes) is not realistic as an output, we propose to revise as follows:
Fully developed valuations of biodiversity and ecosystem services at national scale which have

been ~~incorporated into~~ considered for decision-making processes”

Climate change

- Multi focal area activities are the comparative strengths of the GEF, and we expect that GEF6 climate change focal area activities are designed and implemented to maximize synergy effects and co-benefits with other focal area activities of the GEF. As shown in various previous evaluation works, implementing multi focal area activities have some unique difficulties such as large transaction costs, and we would like to seek clarification by the secretariat that how these difficulties can be addressed in GEF6 programs.

Chemicals and waste

- Among the resources allocated to the chemicals and waste focal area, we are not clear from the document that how much is allocated to POPs, mercury, ODS, SAICM, and wastes. We would like to have breakdown of indicative amounts allocated to each field in the focal area.
- Regarding the CW table 2 on GEF6 support for the Minamata Convention on Mercury (p. 87), we support the composition of the program. We would like to propose that you add activities to support developing a material flow of mercury and introducing a life cycle management of mercury either in Program 2 or 3 of objective CW1. Also, we find that mercury waste-related activities, which are to support the implementation of article 11 of the mercury convention, are missing from the list of examples of potential activities of CW table 2 of page 87. We would like to suggest that you add activities to support environmentally sound management of mercury waste in the list of possible activities.
- Taking into account that the GEF6 and the transitional period until the Minamata Convention on Mercury become effective partially overlap, it is rational that the GEF6 places priority on “early action (paragraph 42)”. We assume that early action includes activities to prepare domestic laws and regulations for countries to ratify the convention and to develop national implementation plans and emissions inventories. As UNEP expects that the convention to be effective in 2016, we suggest that the programing document clearly state that such activities be conducted in line with the guidance on an indicative list of categories of activities to be developed by the COP at its first session.
- It is effective to explore synergies and co-benefits of GHG and mercury emissions reduction, and this approach should be strengthened. For example, coal-fired power plants are primary unintentional sources of mercury emissions; thus, by installing equipment for dust removal, desulfurization, and denitration to those plants, the emissions of environmental pollutants, including mercury, possibly reduces. Considering that the size of chemicals and waste cluster may be relatively small, it is recommended the cluster closely coordinate with other focal area activities to benefit from additional resources allocated to those focal areas.
- Regarding green industry and green chemistry, although we acknowledge the importance of

tackling upstream measures in chemicals management and facilitating the private sector engagement in the chemicals area, thorough consideration would be needed to identify how far the GEF expands its support to the activities directly supporting the private sector. Green industry and green chemistry can be rather treated in the context of the SAICM, as chemicals in products, hazardous substance within the life cycle of electrical and electronic products, and lead in paint are dealt with as emerging policy issues in the SAICM.

Sustainable Forest Management (SFM)

- We welcome having the Program incentivizing SFM again in the GEF6, in order to respond to resource mobilization needs raised in global discussion on SFM at UNFF, FAO, ITTO, among others.
- We would like to request that the four objectives of the SFM strategy in paragraph 24 are set in line with the existing international agreements on SFM, such as Four Global Objectives on Forests agreed upon at UNFF6 in 2006. We would request (1) to add “and protected” after “sustainably managed” for indicator 2.1 to have conformity with Global Objective 3, and (2) to add “and economic, social and environmental benefit of“ after “income from” for indicator 2.3, since it is important that forest-related economic, social, environmental benefits are shared with local communities and small-scale forest owners.

Land Degradation

- Land degradation problems have been addressed by countermeasures against desertification and deforestation. Although the objective LD2 (forest landscape) includes outcome 2.3 (increased investments in SFM in dryland forests ecosystems), the definition of dryland forests ecosystems is not clear. We seek clarification about the demarcation between the activities supported by the land degradation focal area and the activities under the SFM Program.

Signature Programs

- We support the secretariat’s approach to strengthen its integrated multi-sectoral and regional approach through the Signature Programs. We look forward to seeing the secretariat’s proposal incorporating comments raised at the second replenishment meeting.

Sustainable Cities Program

- Given the benefits for regional air pollution control by reducing particulate matters and tropospheric ozone as well as the potential benefits for climate change mitigation by reducing black carbon as a kind of particulate matters and tropospheric ozone, we suggest that the GEF6 allocate sufficient resources to this area. The list of possible activities eligible for support in page 110 includes activities to address regional air pollution concerns, and we welcome this proposal.

- Various countries and organizations have already launched initiatives for urban green growth and sustainable cities, such as Green City Program of OECD, and we would like to understand what added value this Signature Program has on top of these existing activities and we would like to request that this Program is fully coordinated with existing activities. We would also like to have more information about the Program's component 3 "to develop innovative and replicable financial mechanisms/economic models to build the demand for sustainable cities."
- To realize sustainable cities in developing countries, introducing infrastructure with advanced and low-emission environmental technology is indispensable. However, there are various bottlenecks to build such infrastructure such as high initial costs, and large-scale finance to fill the cost gaps of advanced and conventional technologies is needed. We would request that this Signature Program fully includes realistic and feasible exist strategies to move forward from model developments and pilot activities under this Program to actual scaled-up investments.