GEF-6 Replenishment - Third Meeting. Norwegian comments.
Bjørnebye,Erik

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12/31/2013 10:25 AM
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1 Attachment

GEF 6, 3rd meeting. Comments on programming, december 2013.docx

Dear both,

I attach some Norwegian comments on the programming document. With regard to the policy recommendations, we have no particular problems with the recommendations as such. On the other hand, we do have some comments on the background offered in para 4 of the Rev. 02 document, as follows:

From the text as it stands, one can get the impression that the GEF is virtually alone in facing the challenges of environmental degradation and threats to the global commons, as if the GEF operates in a vacuum. We think the
presentation of the GEF and its challenges would benefit from including a perspective on, and more references to, surrounding arenas, processes and tasks picked up by others in the common endeavours, allowing the GEF and its important role to stand out more distinctly. (Ref., inter alia, MEA focus on drivers, UNEP's role in normative environmental guidance, etc). We also note that the proposed Integrated Approaches do not go very far in identifying drivers at the most basic levels. We are not suggesting that the GEF should start addressing such basic issues directly, but they need to be referred to in clear terms in order to identify GEF's operative range and how its efficiency and effectiveness may be promoted.

Best regards, and a Happy New Year!

Erik

From: Jvonamsberg@worldbank.org
Sent: 23. december 2013 05:25
Subject: GEF-6 Replenishment - Third Meeting, Paris, Dec 10-12, 2013 - Summary of the Co-Chairs

Dear Colleagues,

1. Please find attached the Co-Chairs' Summary for the Third Replenishment Meeting.

If participants have any comments on the substance of the Summary, please submit them to us in writing by Friday, December 27, 2013.

(See attached file: Co-Chair Summary GEF-6 Third Meeting Paris 2013 final (clean).docx)

2. Also, please find attached the revised version of the Policy Recommendations paper. As discussed in Paris, please provide comment on this and the Programming Directions to the Secretariat by December 31, 2013.

(See attached file: GEF_R.6_21, GEF-6_Rev.02, Policy Recommendations, revised, December 12. 2013.pdf)

With best regards,

Joachim von Amsberg Naoko Ishii
Vice President CEO and Chairperson
Concessional Finance & Global Partnerships Global Environment Facility
GEF 6, 3rd meeting. Norwegian comments.

Programming

General

In general, we note that it is now clearer that much will be left for Council to follow up and implement, not least for the integrated approaches. Which is as it should be; the messages from the replenishment participants should, in principle, be at a higher and more directive level than day-to-day details. We also, generally, commend the changes to the former signature programs, bringing them more “down to earth”, with improved anchoring at national level, and without losing the basic approach. Thus, they have benefited from the integration exercise and now look more realistic, and the ownership issue seems to better covered. Time will show if the changes are real or just cosmetic.

By and large, we do not have many problems with the focal area strategies, but see some detailed comments below.

Private sector seems reasonably covered/included.

Focal areas

Biodiversity

CBD of course have substantial unsolved financial challenges. On the other hand, we note the presence of much biodiversity also under other focal areas. It is very important for biodiversity to achieve eco system based adaptation and mitigation within climate change, and that work under IW supports biological management of resources and areas.

Also important that GEF does not get involved in projects that undermine CBD and the strategic plan for the Cartagena Protocol. Notably, the IA on African food security must be watched closely – it contains elements that we have warned against before.

We support GEF’s catalytic work in countries, and capacity building is important to achieve results beyond projects. Support is needed both for conservation and sustainable use.

Multi focus work is important and should be further developed as a specific GEF contribution with added value beyond the individual convention.

Climate change

- Welcome the intention to explore complementarity and maximize synergies within the evolving climate finance landscape (para 7).
- Appreciate new formulation about performance based mechanisms (para 45) and the incentives links. But what is meant by para 1 (b) in Annex I (“Incentives for signature integrated projects”)? Beware of jargon and poor communication with regard to real content (playing with words between SPs and IAs?)
A question that has received scant attention is GEF policy on disincentives – e.g., fossil fuel subsidies: Would the GEF support countries on renewable energy if that country at the same time is subsidizing fossil fuels, without a binding plan to phase them out?

Program 1: Transformative technologies: It should be made more clear what expectations are and there should be clear statements about the need to avoid locking in old technologies and development of infrastructure that blocks low carbon development.

Appreciate also the emphasis on SLCFs (para 32).

Program 2 is strategically important. Here there are possibilities to initiate changes in and development of national measures with long term effects and which introduce correct incentives, for example carbon pricing or removal of fossil fuel subsidies.

Program 3 (low carbon urban systems): What is different from the IA? Clarify plans for integrating and cooperating between the focal areas on this point.

Program 5 is also important – integrating commitments etc. in national planning processes. GEF should be able to support countries to develop commitments for post 2020, or develop policies and measures to fulfill these commitments. Or would this last point need to appear in guidance from the COP in order for the GEF to be active?

Set-aside for convention obligations and TNAs: $ 135 million sufficient? Could the use of the rest of the set aside for supra-national strategic priorities be spelled out a little more?

Chemicals and waste

Considerable improvements in the strategy; better focused on the convention functions, while also opening up for the broader work under the SAICM strategy. We thus appreciate separate programmes for convention work, and a clear resource prioritization of these. This has also been made clear in the long term objective.

Details: Positive that it has been made more clear that work should be in line with GEF’s global mandate and not include all waste. Now, perhaps, it goes a bit too far in the other direction? Much of the waste work under Basel and Montreal may fall outside the definition in para 22. In other words, we are positive to the new focus on work where GEF is financial mechanism, but it may be unfortunate if we are to exclude supporting good measures and approaches to, for example, dangerous waste that are broader than under the conventions. This may be the case under enabling activities (Program 1 and 2) and support for regional approaches (Program 6).

In Program 1, “regulatory” could have been included along with economic approaches. The text makes it clear that this is the case. We find that stimulating the establishment of basic rules and regulations is the most important enabling element. Rules and regulations with clear separation of roles between authorities and industry is also important for releasing resources from industry with a view to promoting better health and safety standards.

Very positive that Program 2 specifies possible support for a country’s development of initial assessment and plans for small scale gold digging under the Minamata convention.

Costs and resource requirements for Minamata and Stockholm may be too low, but this would depend on the final replenishment level.
IW

IW1: The goal is important and probably necessary to secure distributional goals for fresh water resources.

IW 2: Important goal. Program 2.1 is more diffuse and has no clear focus. For Program 2.2, focus is clearer, but at the same time very ambitious and demanding.

IW 3: 3.1 has clear objective, but is less clear on how to reach it. 3.2: Good focus and clear and ambitious objective. 3.3 enters into a complex problematic where strong economic interests is an important driver. Perhaps better initially to concentrate on coastal fishing? And then perhaps extend focus when some lessons have been learned? There are stronger capital interests involved on the high seas, and these are more difficult to deal with, even with the assistance of regional fishery organizations.

- Note that GPO is still there, cautiously mentioned here, but not in the IA section. What is current status? And what exactly does "...implemented in synergy with...." (para 56) mean or imply? And what are the "other relevant initiatives"?
- Program 3.3. (sustainable fisheries): Para 68 have optimistic goals - what are they founded on? Para 69 have some quite woolly formulations - could you explain clearly what is intended here? Para 70: Could you describe the mentioned "innovative, market based approaches"? (This para is also a bit unclear).

Land degradation

- Appreciate the removal of ambiguities around the term «guidance» in relation to UNCCD.

Sustainable forest management

- But the same cannot be said of the SFM text (para 16) ("combined guidance..." and including also UNFF).

- Explain (para 21) link to IA on Sustainable Cities in a little more detail?

- Paras 42 – 47: Much good and interesting stuff on operational aspects.

Integrated approaches

Introductory explanations are generally good and most welcome. The closer link to and complementarity with the focal area strategies are appreciated. Making it clear that substantial proposals will be brought to Council for operationalisation is appropriate – this is something we missed in the earlier version. Financing modalities also appear realistic (we hope), as do references to country ownership/incentives.

Amazon Basin

We basically support the approach outlined; the Amazon region’s environmental importance cannot be overstated. Nor can the value of a regional approach be overstated, especially with regard to jurisdictional cooperation, monitoring and verification progress.
Under expected results, we find (para 7) the last sentence on consequences for vulnerable groups, etc., to be too weak: "...pilot WILL SEEK TO AVOID adverse consequences".

Also here (para 11), unfortunately, we note careless wording on the GEF being THE or A financial mechanism – it is not THE FM of the UNCCD.

In para 13, we would like some information on the results of the scoping missions by the Secretariat to see governments and other stakeholders.

**Sustainable cities**

We find this approach interesting, and of course very challenging. As most of the area that will be covered by urban settlements in 2050 has not been built yet, it is obvious that ability to plan and make use of existing knowledge about wiser development is what the GEF should concentrate on supporting.

We appreciate the assurance (para 17) that there will not be direct GEF investment in large infrastructure projects.

Para 23: We are not clear on the $10 million link to the SFM strategy; not on the link itself, nor whether the $10 million is what is envisaged for the regional and/or global component?

Para 25: Is UN Habitat included in the envisaged initial consultation? We ask that reference is made ("other relevant partners").

**Commodity supply chains – deforestation**

No doubt about the importance – and challenges - of this subject. We agree with the point that the approach to commodity production is fragmented. We just hope the GEF is the right institution to take a lead here – not least given the lack of experience, ref. the statement on "paradigm shift for the GEF’s operational modalities" (para 11). In this context, we would advise to secure assistance of appropriate trade expertise – trade aspects not being openly mentioned in the description of the approach. Trade and climate change, trade and biodiversity are established disciplines within the context of MEAs, in the OECD, addressed together in a group in the WTO etc.

We note that consultations have not yet taken place (para 16)? Does this mean that so far, this is a drawing board theoretical exercise?

**Food security/ Sub-Saharan Africa**

In spite of the re-working, the content is still very similar to the one presented as signature program – the impression is one of "window dressing" rather than changes of substance in the programme and approach to possible partners. Thus, our earlier substantial comments still stand.

The overall tone is still a bit theoretical – it seems everything lies in the future, while this of course is the development issue with the longest history and at the heart of the entire millennium development goal exercise. To be convincing, the GEF must clearly build on former achievements and make clear choices about its strategy in a way that is convincing
about its added value. We would appreciate some insights on the foundation on which the proposal is built? The description is also unclear on which/what kind of institutions will be in the lead here. We note that the role of AGRA has been toned down, and ask you to note that this is a continuing concern for several delegations along with the concern about African ownership that we again reiterate. As for the other approaches, the good point is that proposals will be brought to Council for deliberation and decisions.

The resource considerations: Could the estimates of outside mobilization/co-financing (para 26) be overly optimistic? On what are they based?

Fisheries: Any worth while factual content may perhaps be transferred to the appropriate IW part?

Corporate programmes

Appreciate new version of SGP. Can all be done within the same envelope?