

GEF-6 Programming Directions

- Comments Sweden –

General remarks

- Sweden welcomes the high level of ambition in the provided programs but wants to underline that a final decision on the proposed programming directions needs to be based on the final results from the OPS-5, the final replenishment level, as well as the additional analytical documents on the added value of the proposed strategies and signature programs presented by the GEF-secretariat prior to the next replenishment meeting.
- In general proposed strategies and signature programs ought to a higher extent reflect a strong focus on LDCs without compromising expected environmental benefits.
- Proposed strategies and signature programs ought to seek synergies and coherence among them as well as among the conventions guiding the GEF.
- Sweden welcomes that draft framework tables have been presented for each thematic strategy at this early stage.
- Sweden would like to see a much closer alignment of the GEF results framework with the World Bank results framework and the CIF Results Framework, both in terms of terminology, concepts and approaches, and in terms of presentation/results reporting. Sweden would welcome if the GEF secretariat would consult the World Bank results team in order to present a revised the draft framework.
- Indicators should be sex-disaggregated wherever possible and provide clear sources of verification.
- Using the results framework for the Climate Change Strategy as an example, Sweden would like to make the following comments:
 - Goals and objectives should be stated as development results to achieve at the end of the strategy period, not as an activity, see Objective 1, program 1 “promote the timely...”
 - Definitions of outputs and outcomes need to be clarified and some outputs need to be expressed as outcomes and vice versa (example: outcome 1.2 is really an output, while output 1.2 seems be an outcome). The GEF can assist countries in developing and putting regulatory frameworks in place (an output), if these frameworks are used and enforced this would constitute an outcome, and if this in turn leads to slower growth in emissions, this would be on impact level.
 - For each indicator, it need to be clearly spelled out if it refers to an output or and outcome (see World Bank Scorecard)
 - Baselines and baseline year need to be established.

- Targets need to be included, or, if not deemed feasible, tracking of each indicator should be included in reporting (see World Bank Scorecard)
- Some frameworks have outcome targets included (biodiversity framework), other not (climate change strategy)

Biodiversity Focal Area Strategy

- Sweden strongly supports the focus of CBDs strategic plan and its Aichi targets as an overall objective for GEF.
- Sweden supports the focus on ecological infrastructure as this is an important key for both viable protected area systems as for the protection and sustainable use of biodiversity and ecosystem services in the overall landscape.
- Sweden supports the program to address the problems with poaching of elephants and rhinos.
- Sweden agrees that islands are of particular interest when it comes to Invasive Alien Species (IAS), but would like to see activities addressing the problems with IAS on the mainland to also be able to come under consideration by the GEF.
- Sweden urges for focus on synergies between the area of biodiversity and climate change adaptation and mitigation.

Climate Change Mitigation Strategy

- Sweden supports the proposed pilot program on result-based financing. The proposal to tie financing to sectorial or regional emission reduction commitments appears as particularly interesting.
- Sweden supports the proposed program for LDCs and SIDs regarding the promotion of renewable energy production which very much is in line with Sweden's multilateral development aid priorities on focusing on the poorest countries in the world.
- Sweden welcomes the program on promoting development, demonstration and financing of low carbon technologies and policies. The program would make an important contribution to the transition towards a low carbon development in developing countries.
- Sweden supports the program aiming to integrate findings of enabling activities into national planning processes and mitigation targets. Sweden welcomes a continued support for countries to prepare and submit reports in accordance with their reporting obligations under the UNFCCC. The National Communications and MRV system developed under the UNFCCC are key for understanding the climate change challenge, countries needs and efforts to address it.
- Sweden urges for actions taken when designing and performing adaptation and mitigation projects to address biodiversity related safeguard.

- Sweden would welcome the inclusion of a reference on short-lived climate pollutants.
- Projects aiming at replacing ozone-depleting substances should avoid the use of substances with a high global warming potential.

International Waters Focal Area Strategy

- Sweden welcomes the strategic approach in particular in regards to ocean-based management.
- Sweden would welcome a clarification on how the proposed strategy aligns with the World Bank's Ocean program.

Land Degradation Focal Area Strategy

- Sweden sees the merit of working with land degradation issues in a wider landscape and with focus to maintain the long term ecosystem services.

Chemicals Strategy

- Sweden believes the GEF 6 strategy is taken the chemicals strategy in the right direction and has significant improvements from the GEF 5 strategy.
- Sweden welcomes the text in *Para 25* which states that the strategy seeks to create a fully integrated focal area for chemicals and waste that is responsive to the instruments listed earlier in the document (Stockholm Convention; Basel Convention; Rotterdam Convention; Minamata, SAICM and Montreal). However Sweden believes this needs to be better reflected throughout the document. For example *Para 38* under the first objective almost sends the opposite signal.
- Sweden believes the objectives are relevant but would like to see a more detailed discussion to what extent the proposed programs and indicators are serving the objectives of the conventions and agreements relevant for the strategy.
- There are two main components Sweden wishes to see strengthened in the strategy – firstly we wish to see further clarity on the role the GEF will play in relation to the Minamata convention in the interim period and beyond and secondly we wish to see that the strategy is in a more direct way responding to the UNEP GC decision on an Integrated Approach to financing for chemicals and waste. Furthermore Sweden would like to see that SAICM is made more directly visible in the strategy. Although many relevant parts are there, Sweden believes that the strategy would benefit from a more direct language on this issue.
- Sweden hopes that time allows for the strategy to be further developed based on the Conference of the Parties for the Stockholm convention above all but also for the Basel convention and to some extent the Rotterdam convention.
- Synergies are mentioned in Annex 2 which Sweden welcomes. Sweden would suggest however that the notion of synergies is also built into programs and indicators.

MINAMATA CONVENTION

- There is a need to further develop and clarify the role of GEF 6 in relation to the Minamata Convention, in the interim period but also after the convention entering into force. The Diplomatic Conference for the new convention will be held in Japan in October in this year. Sweden believes that it would benefit those discussions if the GEF 6 is as clear as possible on what role it can play and how it will respond to the invitation to serve as the financial mechanism to the conventions in order to facilitate ratification and a rapid enter into force of the convention.
- The strategy document should be further developed and strengthened in relation to how the GEF can support countries in their work towards ratification and the implementation of obligations to ensure their compliance. A clearer mercury component needs to be developed as a subset of the second objective. Sweden also believes that enabling activities in relation to the Minamata convention should be better reflected in several of the programs.
- Sweden therefore wishes to see the programming strategy further developed to better take into consideration the needs in relation to the Minamata Convention. Examples of areas that needs to be further developed in the document are A) Enabling activities including rapid assessments, B) Detailed inventories, C) Development of specific legislation, storage facilities etc., D) ASGM activities, E) Capital investment (moving away from manufacture or mercury-added products or processes using mercury), F) Capacity building workshops and G) Mercury containing products.

AN INTEGRATED APPROACH

- Sweden would like to see a specific mentioning of an Integrated Approach. To some extent an Integrated approach is partly covered by the strategy for example through indicators and outcomes related to mainstreaming and industry involvement, but we do not at this point see that the strategy responds well enough to the decision on an integrated approach taken at the UNEP GC earlier this year. We suggest that the elements of an integrated approach especially in relation to the role and responsibility of industry in cost recovery systems are included. This could be included in what is now program 3 under objective nr 2 and then moved to objective number 1.

SAICM

- GEF 6 includes a substantial part of the period between now and 2020, which is the goal for sound chemicals management. SAICM has sent clear signals and invitations to the GEF and Sweden would like to see a more developed response to those invitations in the strategy. The first objective is of special relevance for SAICM and this could be developed in the suggested programs and indicators.

Sweden suggests the following alternative wording (Due to the formatting of the document we have not been able to comment with tracked changes):

- *Para 37: Assist countries to implement actions to further encourage industry involvement in the integrated approach, including the development of legislation on the responsibilities of industry and national administration, the provision of incentives for sound chemicals and wastes management, and promotion of measures by industry to internalize costs as per the polluter pays principle*
- *Para 40*
 - *Outcomes: Countries develop legislation on the responsibilities of industry and national administration.*
 - *Indicators: Number of countries with legislation that have put responsibilities for sound chemicals and wastes management on industry in order to reduce the costs for national administration.*
- *Para 49 g: Development and demonstration of private sector partnerships, economic instruments and financing models including addressing the responsibilities of industry and national administration to reduce and eliminate chemicals and waste*
- *Para 51: Number of countries with legislation that have put responsibilities for sound chemicals and wastes management on industry in order to reduce the costs for national administration.*
- *Para 53: Amend to: In the necessary policy, economic and regulatory instrument, the responsibilities of industry and national administration should be addressed. Furthermore partnerships with the private sector.... should be considered.*
- *Para 56: ...To deal with the extent of global pollution caused by chemicals and waste of global concern, actions to further encourage industry involvement in the financing are needed for long term sustainable actions,*
- *Para 60: indicators: Add: Number of countries with legislation that have put responsibilities for sound chemicals and waste management on industry in order to deliver chemicals control.*

Sustainable Forest Management Strategy

- Sweden supports the proposed goal which clearly expresses the need of increased regional and global cooperation.
- Sweden supports the programs aimed at building capacity development for SFM within local communities as well as building technical and institutional capacities. Sweden would like to stress that enhanced capacities in this area would enable more countries to contribute to the global efforts to address climate change.

- Sweden urges for synergies between biodiversity, climate change, land degradation and forest management strategies. These issues are strongly linked and would benefit by being addressed in relation with each other.

Integrated Approach to the Global Environmental Commons in Support of Sustainable Development

- Sweden supports the proposed integrated approach and particularly the proposed program on sustainable cities since sustainable solutions in cities are becoming increasingly important with projected urbanization trends.

Corporate Programs Strategy

- Sweden supports the emphasis on integrating environmental sustainability across key development sectors, and across various actors including government, civil society and the private sector.
- Sweden would like to see a stronger focus on women organizations as well as organizations promoting women's rights within the GEF Small Grants Program.