U.S. Comments

GEF-6 Programming Directions

April 30, 2013

We would like to express our appreciation for the work of the GEF in recent years to support a wide variety of important work that benefits the world’s efforts on forests, biodiversity, international waters, persistent organic pollutants, ozone, and climate change. We strongly support continued efforts through the GEF in these areas, as well as taking on new challenges following the successful conclusion of negotiations for the Minamata Convention on mercury, for which the GEF will be the financial mechanism.

Climate

Regarding climate, we see opportunities to build on the complementarities and comparative advantages between the Climate Change Focal Area and other climate financing options such as the Climate Investment Funds (CIFs) and the nascent Green Climate Fund (GCF). At the same time, the GEF’s central role in providing support for reporting and Convention compliance should be preserved in GEF-6. We will need to consider carefully the GEF’s role in climate, as the climate finance architecture continues to evolve, but any changes to the GEF’s Climate Change Focal Area must take into consideration the continued work of the CIFs until their eventual sunset and that the GCF may take some time to become fully operational.

Chemicals

The GEF’s role in supporting mercury pollution reduction efforts will intensify in the coming years as its serves as a financial mechanism for the recently adopted Minamata Convention. In addition, chemicals continue to be used in virtually all industries and manufacturing processes globally, and sometimes in unsustainable ways. We note that the UNEP Global Chemicals Outlook concludes that urgent action is needed to reduce the growing risks to human health and the environment posed by unsustainable management of chemicals worldwide, including mercury, pesticides, and persistent organic pollutants. We look forward to considering chemicals programming needs in GEF-6, including opportunities to increase chemicals-related cross-cutting projects.

Biodiversity

The United States recognizes the leading role the GEF has played in funding biodiversity conservation, and we support a continuing role for the GEF in this area. We note that the GEF’s biodiversity portfolio seeks to strike a balance between conservation and sustainable use, and the GEF has supported interventions at the ecosystem, landscape, protected area, and species levels, all of which are important and mutually reinforcing.
We are pleased by the GEF’s proposed approach to address the problem of wildlife trafficking, which has the potential to undercut global conservation efforts. We support the approach of building the capacity of range states to combat wildlife trafficking. We are also pleased to see the GEF working on issues of consumer demand, which is a key driver of the illegal wildlife trade.

We encourage the GEF to continue its efforts in the range states. In doing so, the GEF should ensure that its work complements those countries’ efforts to stand up regional Wildlife Enforcement Networks (WENs) in the Horn of Africa and Central Africa, as well as other efforts to combat wildlife trafficking in those regions. We urge the GEF to ensure that its work on reducing consumer demand for illegal wildlife products complements and builds upon already existing programs tackling this challenge.

**Land Degradation**

The United States supports the positive contribution that the GEF has made in combating land degradation. In GEF-6, efforts should focus on how to help countries avoid further degrading their land and on how to restore land that is already degraded, taking into account the need to combat climate change and enhance food security.

**Sustainable Forest Management**

We would like to recognize the work of the GEF over the last ten years in supporting sustainable forest management, including the cross-cutting “incentive mechanism” program for sustainable forest management and REDD+ (SFM/REDD+) in the current replenishment period. We will evaluate the successes and challenges of the SFM/REDD+ pilot during GEF-5, and consider the most appropriate ways to carry this work forward during GEF-6.

**International Waters**

With regard to International Waters, the United States is pleased to see an emphasis on Public-Private Partnerships, as well as an increased focus on regional projects. We do believe, however, that Large Marine Ecosystems and ecosystem-based management merit greater consideration in the GEF-6 strategy for International Waters. The Large Marine Ecosystems approach is an integral and complementary component to the wider International Waters portfolio. A Large Marine Ecosystem approach could provide a foundational approach to address explicitly ecosystem-based approaches to trans-boundary regional issues of joint concern. Additionally, while Areas Beyond National Jurisdiction are important in relation to global fisheries under threat, near-shore fisheries on which communities rely also merit consideration, in relation not just to overfishing, but also habitat destruction and shifts due to climate change.

**Integrated Approach to the Global Environmental Commons in Support of Sustainable Development**
We appreciate the GEF Secretariat’s proposal for an integrated approach in promoting complementarities between focal areas while contributing to Rio+20 follow-up. Before we are comfortable with any new organizational approach, among other things, we will need to know:

- that there is a clear strategy to measure results;
- who will manage and be accountable for the program;
- who will contribute funding for baseline development activities;
- how GEF funds will be used strategically to contribute to the incremental cost of achieving global environmental benefits; and
- how the program will be more effective than current approaches.

**Improving Existing Approaches**

We support continuing the current allocation system for the GEF, which is essential to achieving results and ensuring accountability. At the same time, we are also open to proposals to improve the STAR.

*Strategic Planning*

The Secretariat, Evaluation Office, and STAP have all agreed that GEF funding must be more strategically deployed. We therefore want to see a more comprehensive, holistic proposal for how effective strategic planning can be incorporated in the GEF.

*Projects not just at the national level*

We would like to better understand the conditions under which it is more effective to deploy resources in different ways. For example, we heard during the replenishment meeting that regional and multi-focal projects can carry additional transaction costs. When do the benefits of these projects outweigh the costs?

We would also like to better understand how we can build on the resource allocation system to address projects that are not at the national level or can be implemented by the private sector or civil society. For example, we can point to a successful set-aside at the African Development Bank where incentives are provided for using allocations towards regional projects.

*Impact*

How can the GEF improve its focus on and tracking of indicators with regard to broader adoption and multifocal projects?
Resource Efficiency

We would like to see proposals on how the GEF can make its scarce resources go further—i.e., ways to further leverage the GEF’s investments; improve performance of these investments; and broaden the donor base to demonstrate the GEF’s continued attractiveness and relevance.

Corporate Programs

The United States believes that corporate programs can help support capacity development and promote cross-cutting work. However, the corporate programs proposed are not sufficiently integrated with each other, and in some cases they replicate recent work. For example, the NCSAs were only recently completed; we think it is too early for an update. Cross-cutting capacity development work should largely be addressed within the context of projects and programs rather than as part of a separate work-stream.

With regard to Council Member funding, we recognize that some Council members may wish to schedule pre-Council meetings; however such meetings should not result in the diversion of GEF funding from its critical implementation objectives. Relatedly, we expect that any developed country member traveling to visit GEF projects will fund his or her own travel.