



GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS
ON THE GEF TRUST FUND JUNE 2022 WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEFTF June 2022 Work Program

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**JUNE 2022 GEFTF WORK PROGRAM (REFERENCE: GEF/C.62/07):
COMMENTS FROM COUNCIL MEMBERS**

PROGRAMS

1. Regional (Burundi, Congo DR, Liberia, Mali). GEF-7 Africa Minigrids Program Addendum (GEF ID 11009) Agency: UNDP; GEF Program Financing: \$945,079; Co-financing: \$45,400,000.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the proposal, which addresses the major issues for improving the policy and regulatory environment as well as capacities of the private and financial sector to facilitate and accelerate deployment of low-carbon minigrids in the partner countries.

Suggestions for improvements to be made during the drafting of the final project proposal:

- To avoid duplication of efforts and leverage synergies, Germany recommends coordinating project preparation as well as implementation with the following local country offices of GIZ: Burundi, the Democratic Republic of the Congo (DRC), Liberia and Mali. Also the local project teams of the Energising Development Partnership ([EnDev, endev@giz.de](mailto:Endev@giz.de)) can be involved as needed.
- The impact of the proposed program in terms of the increase in RE capacity installed as compared with the total program cost appears rather low. Why is that the case?

✓ **Comment for all UNDP projects**

- In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, and as the independent, risk-based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the UNDP management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

NON-GRANT INSTRUMENT PROJECTS

2. Regional. The Selva Fund (GEF ID 10937). Agency: CI; GEF Project Financing: \$11,118,000; Co-financing: \$77,000,000.

✓ Canada Comments

- The bioeconomy activities outlined in the project proposal are expected to contribute to the protection and restoration of the Amazon Forest whilst supporting sustainable livelihoods for local communities in the Amazon regions of Brazil, Colombia, Peru and Ecuador. The project is strongly focused on livelihood co-benefits and ultimately, achieve global environmental outcomes. The Selva Fund channels support to SMEs for improved land and forest practices in line with practices of the UNCCD. Robust monitoring and evaluations should be encouraged so that best practices can be replicated.
- The proposed NGI project will finance bio-economy activities, forest-based products and commodities value-chains of SMEs in the Amazon region, leveraging on the deliverables of Partnerships for Forest (P4F). Of note that bio-economy is an area that is becoming very popular for programming in the Amazon, with proposals such as The Amazon Business Alliance, and ADELA. It will be extremely important that bio-economy has a nature and conservation focus, and that it does not only focus on utilization of biodiversity. That it results on net biodiversity benefits, reproduction, conservation, as opposed to be driven by economic priorities. Last, the project is invited to coordinate with other projects in order to compliment them, and provide more value added.

✓ Germany Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes this proposal, which will provide financial and technical assistance for bioeconomy, forest-based products and commodities value-chains for small and medium sized enterprises (SMEs) in the Amazon. By promoting sustainable, bioeconomy-based livelihoods, the Selva Fund seeks to contribute to conserving the Amazon Forest and improving employment in rural communities in four countries. At the same time, Germany has the following comments that it suggests to be addressed in the next phase of finalizing the project proposal

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany highly appreciates that the project proposal promotes productive bioeconomy-based activities that contribute to enhancing livelihoods in the Amazon. Given the broad definition of bioeconomy, we recommend applying strict safeguards that ensure that only SMEs are included whose activities do not have negative impacts on standing forest. While this point is generally included in the proposal, Germany believes that the inclusion of commodities poses a certain risk that SMEs that operate on recently deforested land are included.

- We further recommend to establish criteria for funded projects to prevent adverse ecologic effects e.g. resulting from monocultures for bio fuel production.
- Germany welcomes the approach of co-financing and mobilizing private investments for The Selva Fund. The embedding of the Selva Fund in the larger SDG Bond Program is also very promising. To ensure alignment and complementarity, Germany would like to encourage The Selva Fund to coordinate closely with all relevant initiatives on bioeconomy in the four countries included in this proposal, including the Amazon Initiative of the Interamerican Development Bank (IDB).
- In addition, Germany suggests further elaborating the gender strategy and include specific objectives and measures on how the project seeks to contribute to reducing gender inequalities.
- Lastly, given the vast territories in the Amazon that are managed by indigenous peoples and local communities (IPLC), Germany would like to encourage including IPLCs as specific beneficiaries of the project.

✓ **Switzerland Comments**

- Stakeholder engagement is a weak point of the project (as presented); local communities and indigenous have not been consultant and do no figure (separately) in the list of potential stakeholders. How does the project plan on engaging with these important stakeholders and make sure that their rights are not infringed and they benefit from the project as appropriate?
- There is a big gap between the project activities on SME level and the overall goal in more sustainable land use measured in hectares and the criteria to test the environmental and social impact of the project or standards to be used at SME-level are not indicated in the PIF. What criteria does the plan on using? How will the impact generated at the SME level be linked to the overall goal that is the core indicators? It is recommended to use internationally accepted standards like FSC, European Green Bond Standard (Taxonomy), EU Ecolabel etc.

✓ **United States Comments**

- We appreciate the continued work under the GEF NGI window.
- We recommend coordinating with the Ministry of Environment and Sustainable Development in Colombia to improve the impact and sustainability of the project.

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

3. **Venezuela. Conservation and Sustainable Use of Biological Diversity in the Caroni River Basin of Bolivar State (GEF ID 10971). Agency: FAO; GEF Project Financing: \$ 8,765,418; Co-financing: \$52,592,400.**

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany welcomes the project proposal and would like to raise the following points for improvement:
- Under component 1, the proposal states that the participation of IPLCs shall be promoted based on Venezuelan legislation. However, the fair and equitable engagement of indigenous peoples and local communities in the management of PAs (e.g. through community-based management) can achieve better conservation outcomes. It is not clear what is meant with the term 'promoting' participation of IPLCs. We would therefore like to suggest that the participation of IPLCs is ensured in the process of Component 1, rather than promoted, which may not necessarily result in their effective participation.

✓ **United States Comments**

- The proposal mentions several regions of focus, some of which are occupied by armed guerrilla groups that carry out illicit mining activities in protected lands. The proposal does not discuss how these security concerns will be mitigated. There is no reason to believe such efforts would have the backing and support necessary to safely operate in these territories, and more information is needed to understand how the project expects to accomplish its aims amid these significant risks.
- In addition, waterways in this region have been found to be highly polluted with mercury, due to runoff from illicit mining activity. There are documented cases of mercury poisoning in downstream communities. This is an additional risk that impacts biodiversity in the region, and that while beyond the scope of this project, will impact the success of this work.

4. **Nigeria. Conservation of Biodiversity and Sustainable Use of a Lowland Forest Mosaic Landscape in Ogun, Edo, Delta and Ondo States (GEF ID 10990). Agency: FAO; GEF Project Financing: \$3,502,968; Co-financing: \$25,859,000.**

✓ **Canada Comments**

- The security risks are not taken into consideration in the Risks to Achieving Project Objectives (point 5 of the PIF). While ISWAP's stronghold is in northeast Nigeria, experts are noticing what appear to be an expansion of ISWAP's activities westwards and southwards in Nigeria. In Ondo State, a state where this project will be implemented, the June 5 attack in a Catholic Church in Owo that killed 40 people illustrates the serious security risks that are present in Nigeria, even in southeast states like Ondo which is not usually the target of such violent attacks. Moreover, this project will be implemented in lowland forest areas and insurgents and bandits are known to hide and hold camp in forests (insurgents are mainly active in the northeast and bandits in the northwest, however with the expansion of insurgent activities and the potential for further attacks in the southwest, this factor should not be neglected). Considering the high volatility and multidimensional security issues across Nigeria, WWB considers the lack of consideration for security risks to be a red flag for this project. Security threats could affect project assets as well as personnel working for the project.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the project proposal which is strongly linked to existing GEF funded project (FOLUR). While Germany appreciates the complementarity of the two projects, the following point should be taken into account.

Suggestions for improvements to be made during the drafting of the final project proposal:

- There is a close link and seemingly partial overlap with the FOLUR project. While the project proposal describes activities under each Component that are complementary to the FOLUR project, it seems that there is still some overlap in activities planned under Component 1-3. Germany would like to stress that in order to ensure efficient and effective use of GEF funds, the proposed project should by all means avoid any duplication in activities of the FOLUR project.

✓ **United Kingdom Comments**

- This proposal does potentially overlap with the P4F (Partnerships for Forest) programme's work in Okumu National Park in Nigeria, so we need close coordination between this project and the FCDO Nigeria office to avoid duplication.
- In addition FAO is the implementing partner for work under UK PACT in Cross River state Nigeria. The project is titled "Integrated management of mangrove ecosystem and expansion of social protection for fisheries and forest dependents in the coastal communities of Cross Rivers State, Nigeria". UK PACT also works on assuring forest-

positive commodity exports from Edo and Cross Rivers states of Nigeria. It will be helpful to receive reassurances from FAO that outcomes of these projects are differentiated, rather than duplicated, and that FAO are not over-stretching themselves in terms of managing multiple related projects concurrently.

5. Regional (Gabon, Namibia). Enduring Earth: Accelerating Sustainable Finance Solutions to Achieve Durable Conservation (GEF ID 11014). Agency: WWF; GEF Project Financing: \$ 25,000,000; Co-financing: \$96,393,542.

✓ **Canada Comments**

- Several initiatives in environment and climate action are currently funded by GAC in Gabon, but as this project focuses on two countries, it would strengthen and focus Canada's efforts in Gabon, especially considering that forests cover a large area of the country. It would therefore be beneficial to implement a project with a more focused scope regarding resource conservation.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Suggestions for improvements to be made during the drafting of the final project proposal:

- The overall project design is well thought out and structured. However, the project is going to be implemented in Namibia, a party country to the Convention on Biological Diversity (CBD). The proposed project intends to support governments in 'reaching their 30x30 ambitions' and in case of Gabon this seems to be the goal of the project intervention. In case of Namibia, the project will focus on the conservancies without mentioning ambitions to reach the 30x30 goal. The 30x30 goal, while not yet agreed in the ongoing negotiations on a new global biodiversity framework (GBF) under the CBD, is nevertheless an essential and scientifically backed element for reaching global biodiversity targets. Germany would thus like to ask that the proposed project includes a 30x30 ambition for all of the targeted countries.
- In addition, under Outcome 1.2 (Enhanced capacity for domestic resource mobilization in Gabon to achieve PFP goals and commitments) the project addresses an essential element for mobilizing sustainable and long-term resources for biodiversity conservation. Domestic resources play a vital role in this regard, and they already are the largest part of global biodiversity finance. It is therefore not clear why this important aspect of ensuring long-term financing for biodiversity is not part of the project intervention in Namibia. Germany would therefore like to ask that a similar outcome is included for all targeted countries.

✓ **United States Comments**

- Recent oil and gas findings and continued threat from illegal logging both present potential challenges to the success of the project. We would encourage the project developers include these factors and develop an appropriate risk mitigation strategy.

CLIMATE CHANGE MITIGATION

6. Colombia. Energy Efficiency for the Transition to Carbon Neutral Cities in Colombia (GEFID 10917). Agency: CAF; GEF Project Financing: \$7,935,135; Co-financing: \$100,905,560.

✓ **Canada Comments**

- This is the only possible project that may have mercury impacts. It is unclear if the project is only targeted at new building construction or if renovations will also be included. If the project extends to renovations, proper disposal of any mercury-containing lamps should be discussed in the guide to be developed, as part of good environmental stewardship.

✓ **Germany Comments**

Germany approves the following PIF in the work program but requests that the following comments are taken into account:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Building materials play a major role in the energy and CO2 balance during the life cycle of a building. Although the importance of buildings materials is mentioned in the in the proposal, it is not entirely clear what specific measures the project intends to undertake for this matter. Germany requests that the use of sustainable and local building materials is more comprehensively integrated into project implementation and addressed in the proposal.
- A better understanding of how the aspects of climate adaptation and resilience can be addressed in the project would also be appreciated.
- Furthermore, in the sense of an integrated approach, the aspect of citizen participation / civil society involvement, including in the design of residential buildings and public places should be taken into account in the implementation of the project. This could be accompanied by awareness-raising and educational campaigns to reduce private energy consumption.
- Based on the proposal it is not clear why the cities of Barranquilla, Montería and Pasto were selected for the implementation of pilot projects. Germany would therefore appreciate a clearer description of the selection process.
- With regards to Output 1.1.1: From the objective of the proposal and the performance indicators, it reads as if a new regulation or standard is to be developed. The proposal

further develops the previous context of what has been developed in Colombia in terms of energy efficiency and sustainable construction in buildings, so the indicators should refer more to the improvement, revision, strengthening of current standards without ignoring from the outset that there is a road already covered.

- In the part on co-financing, although the counterparts of the cities are referred to as mobilized investments, it is not clear from the text of the proposal how the cities count or mobilize such financing for the investment of the projects. Further elaboration on this issue would be appreciated. In most of the proposals, the counterparts of the cities fall due to lack of financial support.
- Additionally, the proposal defines the municipal councils as co-financiers. This requires clarification, since usually city councils as entities do not directly receive or co-finance investments or projects. Alternatively, it is suggested to change it to the municipal government entities in charge of the implementation of the projects, for example, environmental or planning secretariats.
- The project proposal identifies the Colombian Council of Sustainable Construction, the Colombian Chamber of Construction – CAMACOL as a private sector representative and key actor in the implementation of component 1. It would be appreciated if within the identified barriers and risks, the role of CAMACOL could be mapped out and how possible risks and barriers of involving such a strong market player can be mitigated and overcome.

✓ **Switzerland Comments**

- How does the project ensure complementarity to and synergies with other EE projects and initiatives on the same subject?
- The success of the project will to a large extent depend on an active, knowledgeable and flexible project PEU, which can effectively interact with the various stakeholders including the different Government agencies and entities. How will the PEU be set up and equipped to fulfil this role?
- The PIF does not focus on thermally comfortable buildings, but rather on energy efficiency and decarbonisation. The building's owners and tenants might not be aware of the environmental aspects, but have a good understanding of thermal comfort (How does the project plan on addressing this issue, if at all?)
- The PIF mentions the importance of "life cycle approaches" which also integrates grey emissions from construction processes and building materials. In future this will be a major challenge for a zero-emission building sector. How does the project plan on addressing this challenge?

✓ **United States Comments**

- We recommend coordinating with the Ministry of Mines and Energy and Financiera de Desarrollo Nacional (FDN) development bank for Output 1.1.6.

7. **Brazil. Strengthening the National Transparency System in Brazil Under the Paris Agreement (DataClima+)** (GEF ID 10932). Agency: UNEP; GEF Project Financing: \$3,835,616; Co-financing: \$500,000.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Suggestions for improvements to be made during the drafting of the final project proposal:

- While the proposal states that the “Ministry of Science, Technology and Innovations (MCTI) is responsible for the management of climate data, development of climate data systems and production of UNFCCC reports” the overall political mandate for the general climate agenda, NDC and the national transparency system of the Paris Agreement lies with the Ministry of Environment (MMA). The mandates of both ministries are not clearly defined, which recently became evident again through the publication of [presidential decree No 11.075](#), which designs a National System for the Reduction of Greenhouse Gas Emissions (SINARE) operated by MMA. The decree states that a joint act of the Ministers of MMA, Ministry of Economy (ME) and MCTI may establish compatibility mechanisms with the National Emissions Registry System (SIRENE) operated by MCTI, but there is no guarantee that this will happen. MCTI and MMA did not seem fully aligned about the decree, and there is a possible overlap between SINARE and SIRENE and MCTI’s mandate in registering and reporting emissions reductions and removals. Taking this lack of clarity into account, Germany requests specifying MMA’s role within the project.
- The „Climate Policy Programme Brazil” (PoMuC) implemented by GIZ, funded by the German Ministry for the Environment (BMUV) within the International Climate Initiative IKI - a project mentioned under Table 3 - contains a component to support a transparency system (Paris Agreement), in cooperation with MMA. PoMuC furthermore supports the development of a new module under SIRENE to register corporate GHG inventories. The “Supporting Brazil in the implementation of its National Agenda for Climate Change Adaptation” (ProAdapta) project, also funded by BMUV/IKI, supports the MCTI with “AdaptaBrasil”. All three components potentially overlap with the project proposal. Germany requests adding this information to the proposal and to align with BMUV and GIZ to avoid double efforts, identify synergies and achieve maximum impact.
- Germany welcomes the focus on gender-sensitivity. To support inclusive policymaking, it is recommended to compile disaggregated data for other groups which are vulnerable to climate change, especially indigenous and black people.
- Germany appreciates the aim to make all data publicly available through public dashboards, facilitating greater national transparency on climate action. In this regard Germany stresses the importance of accessibility. It is recommended that all data is cost-free, barrier-free, accessible through a smartphone and easy to understand.

✓ **United Kingdom Comments**

- In relation to the third component of this project; supporting national policy- and decision-makers to more effectively incorporate climate data and projections into their regulatory processes.

- Brazil through its Science Ministry (MCTI) is already technically adept at managing its GHG data. It already has good GHG emissions trajectories and calculations – although comments on the proposal do pick-up this possible duplication with previous projects.
- We support development an integrated national data system to strengthen data utility and transparency. Most critical is how data is deployed to policy makers beyond MTCL. It will be helpful to understand how Brazil (MCTI) intend to utilize this data against their COP26 NDC commitments, which are to halve emissions by 2030 leading to net-zero by 2050.

8. Turkmenistan. Developing National Capacity of Turkmenistan through Improving Regulatory Environment towards Energy Efficient and Sustainable Building Sector (GEFID 10996). Agency: UNDP; GEF Project Financing: \$2,068,004; Co-financing \$28,446,643.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes this proposal, which addresses the major issues for improving the regulatory environment in Turkmenistan towards an energy efficient and sustainable building sector. At the same time, Germany has the following comment that it suggests be addressed in the next phase of finalizing the project proposal.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany recommends including a pilot in Component 1, which demonstrates costs involved and gains for energy efficiency to modernize or retrofit existing private and public buildings to a nearly zero-energy standard.
- The aspect of sustainable and local building materials should be strengthened in the project design and implementation, as it is a crucial factor for the overall energy and CO2 balance during the living cycle of a building.
- The local level of government should be strengthened. Climate-sensitive planning, which for example plans the construction of new buildings, their height, orientation, and design in relation to cold air corridors, green and blue infrastructure as well as social infrastructure, can contribute significantly to energy and CO2 reduction. Therefore, sustainable urban planning should be considered more in the project design.
- Also, the aspect of climate adaptation and resilience can be adressed in more detail.

✓ **Switzerland Comments**

- Does the project plan on considering thermal comfort as one of the indicators to be measured in order to support follow-up decisions and new standards for upscaling?
- It would seem important to coordinate the project with other ongoing GEF Sustainable Cities project in order to expand the political impact of EE project to the entire new city. Does the project plan on doing so and if so, how?

- Does the project plan on engaging other actors including the new city administration, planners, engineers and involve public participation in order to make the entire new city more energy efficient and better adapted to climate impacts? In our assessment such a city-wide approach will promote innovation and increase the project's replication and demonstration potential.
- Does the project consider RE production, namely off-grid solar power? In our assessment the project (design) would be greatly if it (showed how it helps) boost(ed) the use of solar energy, reduce(ed) urban heat island effect and promote(d) climate-smart city concepts that result in dual mitigation and adaptation benefits.
- How does the project plan on mitigating the risk that the 2 new buildings are built among the last ones, beyond the GEF project duration? In our assessment it would be important to ensure that the two projects are implemented early and can thus have a lighthouse effect for the entire area development.

✓ **United Kingdom Comments**

- While the project is focused on domestic emissions Turkmenistan has other more impactful emissions (e.g. methane) it would be helpful if this domestic emissions project could act as a catalyzer for more GoT focus wider emissions reduction.

✓ **United States Comments**

- We are supportive of the objectives of this project, notably the creation of modern building codes and developing a system to do rigorous inspections that includes meaningful penalties and enforcement. However, the project must include training of building inspectors and establishment of a more professional administration for building inspections to ensure successful enforcement of these building codes.
- We would also encourage the project developers to consider how this pilot program can be scaled across the country.

✓ **Comment for all UNDP projects**

- In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, and as the independent, risk-based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the UNDP management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

LAND DEGRADATION

9. Argentina. Comprehensive Land Management in Forestry and Agri-food Systems of Three Water Basins in Argentina to Contribute to Land Degradation Neutrality (LDN) and to Mitigation and Adaptation to Climate Change (GEF ID 10866). Agency: CAF; GEF Project Financing: \$2,959,481; Co-financing: \$24,971,732.

✓ Canada Comments

- The project, if successful, will address existing issues in Argentina’s land management approach to make the land targeted by the project more resilient to climate change, more productive and reduce GHGs from soil erosion. The project’s goals are linked with Argentina’s NDC, as noted in the STAP Review, the project could also utilize tools and resources from the UNCCD. However, it is interesting that the co-funding for this initiative is from domestic public entities only.
- The proposal describes different target beneficiaries of the project. It’s important to clarify who are the “target population” (Project Outcome Indicator 1.2.1) and “target audience” (Project Outcome indicator 1.2.2) in these respective indicators.
- The project aims to increase agricultural productivity. Therefore, it is important for the project to monitor changes in the agricultural productivity as a result of the interventions. If appropriate, consider adding a SDG indicator 2.3.1 Volume of production per labour unit by classes of farming / pastoral / forestry enterprise size (source: <https://www.fao.org/sustainable-development-goals/indicators/231/en/>)
- Deforestation: As the project aims to reduce land degradation, the project should consider monitoring a net change of forest covers in the water basins - the sum of all forest losses (deforestation) and all forest gains (forest expansion) (reference: <https://www.fao.org/forest-resources-assessment/2020/en/>) that tells an overall trend of forest cover at the landscape level.

✓ Germany Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the proposal, especially as it aims to make use of the synergies between actions to achieve Land Degradation Neutrality, and climate change adaption and mitigation.

Suggestions for improvements to be made during the drafting of the final project proposal:

- ✓ Explore potentials to align LDN targets and NDC targets in order to increase synergies in monitoring and reporting as well in integrated planning for coordinated implementation of the UNCCD and the UNFCCC in order to ensure outputs that combine multiple objectives regarding LDN, adaption to and mitigation of climate change.
- ✓ Consider linking to ongoing global initiatives working on related objectives, such as the Group on Earth Observations Land Degradation Neutrality ([GEO LDN Initiative](#) . Tools like [LUP4LDN](#) (Land Use Planning for Land Degradation Neutrality) may be helpful to better

plan and monitor LDN interventions, thereby addressing barrier 1 mentioned in the proposal (weak and uncoordinated planning and oversight of land use at landscape scale).

✓ **United States Comments**

- We have strongly opposed the use of non-voluntary land degradation neutrality (LDN) targets because Land Degradation Neutrality is only one approach of many to combat the impacts of drought and desertification. We support in a general sense the aim or aspiration of land degradation neutrality, but we want to ensure that LDN is not promoted to the exclusion of other approaches or being codified with mandatory targets.

10. Burkina Faso. Sustainable Land Management to Strengthen Social Cohesion in the Drylands of Burkina Faso (GEFID 11003); Agency: UNDP; GEF Project Financing: \$3,502,968; Co-financing: \$12,300,000.

✓ **Canada Comments**

- This is a strong project proposal for an area in need of forest/land management in order to increase the country's resilience to climate change. The project also applies a gender sensitive approach which aims to recognize and assist the participation of women in land management.
- The project aims at strengthening social cohesion among different actors and land use groups at a landscape level. However, the proposal does not explicitly specify what measurable indicators will be used to monitor changes in different aspects of social cohesion (e.g. trust, reciprocity, sense of belonging, experience of being valued, needed by others, etc.) in the process of improving governance and sustainable land management.
- Currently, the proposal indicates "Data on gender disaggregated count of project beneficiaries is collected annually, in addition to other relevant socio-economic data, including on social cohesion indicators, stakeholder engagement and community outreach will be reported under Component 2." As promoting social cohesion is one of the key goals of the project (as shown in the title of the project), the proposal should elaborate what aspects of social cohesion that are most important in the selected landscapes, why they are important, and the measurable targets of the important social cohesion dimensions.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes this proposal which applies the Land Degradation Neutrality Concept practical approach while promoting social cohesion. At the same time, Germany has the following comments that it suggests to be addressed in the next phase of finalizing the project proposal.

Suggestions for improvements to be made during the drafting of the final project proposal:

- Further elaborate on how social cohesion is addressed by the project and which concrete actions - beyond gender mainstreaming and the inclusion of vulnerable groups - contribute to ensuring social cohesion.
- Elaborate on how the project will contribute to the objectives of the Great Green Wall Initiative (GGWI)
- Germany highlights the potential of exchange with ongoing projects of the German development cooperation present in Burkina Faso, such as the Global Projects “Soil Protection and Rehabilitation of Degraded Soil for Food Security (ProSoil)” (2014.0156.1) and “Responsible Land Policy” (2015.0124.6). Further, learnings from the concluded project “Erosion control, soil fertility protection and recuperation of degraded surfaces, adaptation to climate change” (201297522) could be taken into account.

✓ **United States Comments**

- Increased attacks from violent extremist organizations are causing large-scale internal displacement in Burkina Faso. Desertification and resource scarcity are contributing to the violence. However, we remain concerned about the implementation of this program which seeks to address those root causes. The PIF discusses the problems of violence and internal displacement, but it does not address implementation risks and mitigation measures.

✓ **Comment for all UNDP projects**

- In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, and as the independent, risk-based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the UNDP management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

CHEMICALS AND WASTE

11. Iraq. Integrated Persistent Organic Pollutants (POPs) Management Project (GEF ID 10972). Agency: World Bank; GEF Project Financing: \$13,487,495; Co-financing: \$89,000,000.

✓ **Canada Comments**

- Canada supports this project as it is in line with the Stockholm Convention. PCBs are a priority as the deadlines to remove from use (2025) and destroy/irreversibly transform them (2028) are fast approaching. Additionally, updating National Implementation plans is a Convention obligation.

✓ **Switzerland Comments**

- Important information regarding the project components, activities, outputs, and outcomes are missing. E.g. no information on the technologies used to dispose the hazardous chemicals and the contaminated equipment is provided. Also, information about the baseline scenario is lacking. When does the Secretariat intend to present this information? Will the PIF be presented again at the 63rd Council Meeting in December or will a revised version be circulated to Council members in-between meetings?

12. Costa Rica. Strengthening the National Capacity for the Management of POPs in Costa Rica (GEF ID 11015). Agency: UNDP; GEF Project Financing: \$4,000,000; Co-financing: \$16,550,000.

✓ **Canada Comments**

- Canada supports this project as it is in line with the Stockholm Convention. PCBs are a priority as the deadlines to remove from use (2025) and destroy/irreversibly transform them (2028) are fast approaching.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Suggestions for improvement to be made during the drafting of the final project proposal:

- The PIF is well reasoned and designed. By addressing the management of POPs and strengthening institutional capacities, it directly contributes to the goals of the Stockholm convention and the GEF chemicals and waste focal area strategy.
- Please assess whether synergies with other development projects in Costa Rica can be used. A relevant project might be “Transformative Low Carbon and Climate Resilient Pathways of Costa Rica” (implemented by GIZ) which also addresses sustainability issues in the sugarcane production (among other value chains).

✓ **Switzerland Comments**

- Overall the PIF is considered of high quality. However, the project would benefit from the inclusion of a gap analysis of the existing policies against the Overarching Policy Strategy like proposed by SAICM to advance and strengthen the sound management of chemicals and waste not only in the area of POPs, but for all hazardous chemicals and waste fractions to achieve a coherent and comprehensive management system and to overcome deficiencies in a closer cooperation and coordination among all relevant stakeholders dealing with hazardous chemicals and waste in the country.

✓ **Comment for all UNDP projects**

- In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan

that address the OAI recommendations are being implemented, and as the independent, risk-based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the UNDP management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

INTERNATIONAL WATERS

13. Regional (Malawi, Mozambique, Uganda). Groundwater for Deep Resilience (G4DR) in Africa (GEF ID 10970). Agency: FAO; GEF Project Financing: \$5,786,073; Co-financing: \$33,210,000.

✓ Canada Comments

- We would like to emphasise the importance of ensuring a gender inclusive approach to project development, decision-making and implementation as women are disproportionately impacted during times of water scarcity given their roles as primarily “water managers” at the household and community levels.

✓ Germany Comments

Germany approves the following PIF in the work program but requests that the following comments are taken into account:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany has been a supporter of AMCOWs Groundwater program, and as such, welcomes the efforts to further develop this initiative. However, the proposal should address in more detail the synergies with previous and ongoing APAGroP activities, to build upon the achievements reached so far. Since the project management unit will be taken over by IWMI, Germany asks how the project will ensure ownership within AMCOW, accountability to its member states and anchoring of the program within the African Institutions.
- The PIF claims a lack of consideration of groundwater in discussions on the Africa-wide water agenda. However, in the description of the baseline scenario the PIF names several Africa-wide initiatives, especially the AMCOW-AU calls for greater consideration of groundwater and the establishment of the AMCOW Groundwater program APAGroP. Germany asks to review the assessment of the actual status of groundwater in the Africa Water agenda, and this might refine the scope of the project.
- The PIF does not reflect how the project interacts with the several programs, initiatives and actors that are engaged in the field of water resources management with AMCOW, including groundwater resources and transboundary waters. Furthermore, it is not visible how a dialogue has taken place with target groups like MS, REC’s and L/RBO’s. To address the needs of African institutions and avoid a risk of overlapping of mandates

and parallel structures, Germany asks for a coordination mechanism that harmonizes activities, identifies synergies to increase the efficiency of the project and finally maximizes outcomes.

- Germany acknowledges the need to combine, refine and disseminate the existent continental information on groundwater resources and its uses (component 2), of demonstrating the benefits of groundwater (component 3) and of proper knowledge management to secure and disseminate the results (component 5). However, Germany assesses the ambitions of the outcomes (cost/benefit ratio) of the components 2, 3 and 5 as relatively low, considering the invested funds.
- For component 4, Germany welcomes the initiative of including youth in the solution of Africa's groundwater challenges. The initiative has similarities to other ongoing efforts in this direction, mainly the UNESCO Groundwater Youth Network, and Germany asks to specify the relation to these and other international initiatives, in order to use synergies.
- Lack of groundwater planning is identified as a major barrier to unlock the potential of groundwater for development. Groundwater planning is under sovereignty of national states and responsibility of national or sub-national authorities, and it remains unclear how the project channels its agenda-setting and piloting activities to the relevant authorities at the national level at a wider scale. The PIF could benefit from a clearer description of how the proposed activities deliver the envisaged outcome.

14. Regional (Argentina, Bolivia). Integrated Water Resources Management in the Transboundary Bermejo River Basin (GEF ID 10995). Agency: CAF; GEF Project Financing: \$6,350,000; Co-Financing: \$45,700,000.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes this proposal, which will update the basin's TDA and SAP processes and will foster strengthened cooperation between Argentina and Bolivia for water resources management. Germany highly welcomes the proposed approach to include groundwater dimensions into the river management plans and activities, as this promises an integrated and conjunctive management of water that is essential to meet future challenge of the region. At the same time, Germany has the following comments that it suggests being addressed in the next phase of finalizing the project proposal.

Suggestions for improvement to be made during the drafting of the final project proposal:

- Germany acknowledges the effort in data acquisition to define conceptual groundwater models and to identify recharge and discharge areas of aquifers. Such data generally serves as baseline data for numerical groundwater models that allow predictive modelling of different groundwater scenarios. To make further use of this data, Germany suggests preparing steps to create a numerical groundwater model, by building further partnerships.

- Given the transboundary nature of the project and the different activities proposed, it is suggested to identify executing partners early on, so that they can participate in the PPG phase.
- The project includes only actions at the regional level and thus considers the total of the population as beneficiaries. Germany suggests identifying how project activities will address specific population groups like most vulnerable population in terms of poverty and climate change vulnerability. More specific gender indicators are also suggested.
- The global environmental problem identified is accelerated erosion. Germany suggests specifying the specific project interventions that will address this problem. Links to land restoration global benefits (such as carbon capture) could also be added.
- While the proposal mentions Bolivia's Multiannual Program for Integrated Management of Water Resources and Integrated Management of Watersheds, 2017-2020, it doesn't describe the governance mechanisms, civil society platforms and planning tools that it has established for strategic basins – notably for the Guadalquivir sub-basin, which can serve as a basis/model for the project's interventions.
- Germany considers that the Basin Management Plan of the Guadalquivir River is a key input for the new SAP.
- For component 1, Germany suggests that synergies with the new Geographic Information System of the State Government of Tarija should be considered.
- Component 3 mentions legal, institutional, and legislative reforms. Germany suggests specifying the process of formulation, harmonization, and approval of the reforms in both countries. Also, adding an item to the Risks table where mitigation measures are given in case there are difficulties during the reform process.
- For component 4 (and PPG), Germany suggests taking as a model the Interinstitutional Platform of the Guadalquivir Basin, as well as the technical and social councils that have been established in the context of the Basin Management Plan of the Guadalquivir River. The model could also be adapted to the specific situation of the other Bermejo sub-basins.

15. Global (Ecuador, Guatemala, Mauritania, Morocco, Panama, Senegal). Mainstreaming Sustainable Marine Fisheries Value Chains Into the Blue Economy of the Canary Current and the Pacific Central American Coastal Large Marine Ecosystems (GEF ID 11011). Agency: UNDP; GEF Project Financing: \$10,733,945; Co-Financing: \$36,255,000.

✓ **Germany Comments**

GERMANY REQUESTS FOR THE FOLLOWING PROJECT THAT THE SECRETARIAT SENDS DRAFT FINAL PROJECT DOCUMENTS FOR COUNCIL REVIEW FOUR WEEKS PRIOR TO CEO ENDORSEMENT:

The proposal includes a solid analysis of issues around fishing and seafood consumption, reiterates known problems and some of the root causes of overfishing. However, the suggested

solution/ project seems to be a transferred “one-size-fits-all” market-based approach which has been used (and sometimes been successful) in developed countries, especially the EU and US Seafood Markets. The proposal does not lay out, what a context adapted approach looks like. Also, while the project proposal focusses on conservation outcomes, these must not come at the cost of approaches and programs in support of food insecure people in developing countries. It is equally required to develop means for transforming fisheries that supply domestic markets and food insecure populations on a path towards sustainability. None of the associated risks with market-based approaches such as food/nutrition insecurity is addressed, and no mitigation measures have been identified. Throughout the proposal, international and domestic markets are lumped together which risks the envisioned project outcomes and conservation gains.

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- A clear outlook towards safeguarding local food and nutrition security: the applicant has rightly identified that “seafood is a basic staple food in developing economies. Future seafood price increases will further limit access for poor and vulnerable local consumers.” At the same time, the executing agency suggests connecting the targeted fisheries to be listed on their (and thus financed through the project) website fishsource.org, which “aims to make this information more accessible to seafood buyers”, i.e. attracts international buyers to products that are needed for local nutrition supply, e.g. the small pelagics of West-Africa. This bears the risk of price increase and outcompeting local buyers as has happened with women buyer groups and fish meal producers/factories in the region.
- Consider local circumstances: there is a special issue with small pelagics being used for fish meal and fish oil (FMFO) in Mauritania. The suggested market-based solutions such as eco-labelling (and even a double certification with a to-be-developed social certification system based on the Monterey criteria) will undoubtedly increase the costs for fish products locally, jeopardizing the accessibility of important protein and micronutrients for the poor of the region. Addressing ecological sustainability is not enough to solve the issue, transition/redirection towards more human consumption is imperative, but nowhere addressed in the proposal.
- Redefine beneficiaries and adjust accordingly: this proposal is geared towards the interests of major (Western) buyers, retailers (with tools such as roundtables, certification, FIPs) and the agenda of the self-proclaimed (US) “Sustainable Seafood Movement”, local stakeholders should be equal beneficiaries at least, if not mainly.
- Address political issues: it remains unclear if/how the project plans to work along the coast north of Mauritania. Sovereignty over Western Sahara is contested between Morocco and the Polisario Front and its legal status remains unresolved. The United Nations considers it to be a “non-self-governing territory”. Only the Moroccan Government is listed as a stakeholder to be considered; the beneficiaries of the project remain unclear in this context and more political sensitivity is necessary when trying to achieve conservation gains.

✓ **United States Comments**

- Morocco is the only country listed that has a Sustainable Fisheries Partnership Agreement in place with the European Union. This project should complement and/or enhance the Sustainable Fisheries Partnership Agreement, and not duplicate work under this agreement.
- We would advise that success in countering overfishing and the related worker abuses (e.g., nonpayment of wages, abusive working conditions, forced labor) hinges on collaboration between ministries, including fisheries ministries and labor ministries, with port and maritime officials, trade unionists, and civil society. Fishery workers, whether crew, artisanal, port workers or fish processing workers, can be protected and empowered through approaches that create functional mechanisms for them to participate in preventing, identifying, and remedying abuses. This approach to worker involvement would contribute to the goals of the project while mitigating environmental and social risks and can be part of the project activities on engaging the project sector and artisanal fishers.
- We recommend coordination with Panama's Ministry of Agriculture and the Panama Maritime Authority. Working with flag registries in Panama, along with other countries, could allow for additional means to address the risk associated with illegal fishing.
- We want to encourage coordination civil social organizations, like MarViva in Panama, and with existing private sector entities developing sustainable seafood programs.
- We also note the lack of mention of working with Spanish Authorities, despite the long-running dispute over maritime boundaries in the Canary Islands Upwell. To make progress on sourcing and labeling sustainable seafood, there would likely need to be an agreement between Morocco and Spain on fisheries licenses.

✓ **Comment for all UNDP projects**

- In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, and as the independent, risk-based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the UNDP management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

MULTI-FOCAL AREA PROJECTS

16. Djibouti. Conserving Biodiversity and Restoring Ecosystem Functions in the Day and Mabla Mountains (GEFID 10874). Agency: UNDP; GEF Project Financing: \$3,269,028; Co-financing: \$,9,000,000.

✓ **Canada Comments**

- Farmer-Managed Natural Regeneration (FMNR) techniques have a long history of success in increasing tree and vegetation cover and land productivity in grazing lands in Niger. They may have a potential to enhance natural regrowth of shrubs and trees in Djibouti and complement the techniques that are currently included in the sustainable grazing agreements. Consider exploring FMNR techniques as one of the interventions in the agreements if they have not been considered yet.
- The choice of solar energy to power the water pumping systems in Ouadis represents the most appropriate technological solution in the context of the GEF proposal. In addition, it reduces GHG emissions from fossil fuels in these communities and is an environmentally and economically attractive option for these communities. It's important to have increased transparency and traceability in solar panel supply chains given the link between the solar panel industry and forced labour in the Xinjiang region.
- It's important to mention the issue of waste management from renewable energy equipment (solar panel, batteries, etc.). Without imposing all responsibility for waste management on the implementing partner, an analysis of how this will play out would be welcome.

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany welcomes the project proposal which builds on previous projects in the area. The following points for improvement are suggested:
- The project heavily relies on country ownership and commitment, including mobilization of domestic finances. Country ownership and commitment are vital elements in the long-term success of the project itself as well as in the long-term success of sustainable PA management (in particular domestic financing, which is supposed to increase by USD 300,000 annually, and the PA agency to be created). We would like to suggest that the project proposals sets out how such long-term commitments are going to be secured (e.g. through legislative measures) and what alternatives might be used in case domestic support cannot be maintained in the long run.
- The creation of alternative livelihoods based on livestock increased by at least 20% may also negatively impact biodiversity and ecosystem services. The project should thus

consider a careful assessment of the positive and negative impacts expected from such activities.

- One way of ensuring that biodiversity and ecosystems of PAs are protected by local communities is by applying a community-based management approach. The project proposal mentions community engagement several times, without going into the details of how such engagement will be carried out. Given the importance of fair and equitable engagement of indigenous peoples and local communities, we would like to suggest that the project evaluates the potential impacts of all community-related activities on these communities (not necessarily will each group in every community be in favor of the activities to be carried out).

✓ **Comment for all UNDP projects**

- In light of the recent audit report by the UNDP Office of Audit and Investigations (OAI) of UNDP GEF Management, all projects included in the Work Program implemented by UNDP shall be circulated by email for Council review at least four weeks prior to CEO endorsement/approval. This shall take place as actions of the Management Action Plan that address the OAI recommendations are being implemented, and as the independent, risk-based third-party review of compliance by UNDP with the GEF Policy on Minimum Fiduciary Standards is being completed. Project reviews will take into consideration the relevant findings of the external audit and the UNDP management responses and note them in the endorsement review sheet that will be made available to the Council during the 4-week review period.

17. Indonesia. Protection of Biodiversity and Sustainable Land-use in Conservation Landscapes in South Sulawesi, Gorontalo and East Nusa Tenggara (GEFID 10913). GEF Agency: UNEP; GEF Project Financing: \$8,400,000; Co-financing: \$38,900,000.

✓ **Canada Comments**

- Biodiversity conservation is a priority of this project. Habitat suitability of the project areas (Output 1.1.1) for certain species may (or may not) change under different climate change projections/scenarios. Analysis of habitat suitability or projected spatial distribution of the species can inform design and implementation of habitat restoration and species protection. And, this analysis should form a crucial basis for the Integrated Conservation Landscape Plans. It is understood that climate change projections/scenarios potentially affecting the target provinces have been considered. Consider making it explicit that output analysis (1.1.2) includes the analysis of potential spatial distributions of endemic or threatened species (including economically important plant species of concern if possible) and therefore habitat suitability for the species in the region under different climate scenarios and time frames. If this has not been considered, including this analysis is welcome.
- The project identifies deforestation or loss of forest cover as a major concern for the Wallacea region, and the proposal indicates that the project would result in a reduction of 20% in the current rate of deforestation. It's important to consider adding a project

outcome indicator that reflects the impacts of the project on reduced deforestation such as the net change of forest cover in the project landscapes - the sum of all forest losses (deforestation) and all forest gains (forest expansion) (reference: <https://www.fao.org/forest-resources-assessment/2020/en/>).

✓ **Germany Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Suggestions for improvements to be made during the drafting of the final project proposal:

- Germany welcomes the project proposal, in particular the landscapes approach, as well as the focus on OECMs, social forestry schemes and agroforestry, and would like to raise following points for improvement:
- Generally, the description of the project proposal is at times hard to follow due to long, sequencing sentences. We would like to strongly suggest that language is simplified by using punctuation more clearly to clarify content of the proposal.
- Regarding Output 1.1.1., it would be helpful to differentiate between a) identification of drivers, b) (participatory) identification and prioritization of measures to halt them and c) identification of optimized investment to finance these measures.
- Regarding the identification and implementation of sustainable sources of financing in Component 3, we would like to suggest that the assessment of market potential of the targeted commodities is carried out before the commodities are chosen. Please indicate from the start more clearly on what basis the commodities are chosen, including their market potential.
- Secondly, regarding Component 3, we would like to seek clarification on the de-risking of the commercial investment. De-risking will play an essential role in securing investments and thus in securing the long-term viability of the project. The language here is however unclear (see comment regarding improving difficult language) and we would like to suggest that the project proponents clarify in more detail how the de-risking will be carried out (which funds are to be used).

18. Chad. Innovative Approach to Protect Ouadis Through the Promotion of Non-connected Mini-grid Solar Energy in Three Municipalities (Mao, Kekedena and Nokou) of Kanem Region, Chad (GEFID 10998). Agency: UNEP; GEF Project Financing: \$2,954,534; Cofinancing: \$21,500,000.

✓ **Canada Comments**

- The choice of solar energy to power the water pumping systems in Ouadis represents the most appropriate technological solution in the context of the GEF proposal. In addition, it reduces GHG emissions from fossil fuels in these communities and is an environmentally and economically attractive option for these communities.
- However, in the PIF document on p.36, it's mentioned that "out of the main 4 types (monocrystalline, polycrystalline, PERC, and thin-film) and the 2 standard sizes (60-cell

and 72-cell) of the Solar Panels available on the markets the best type will be selected based on the expert's guidance and stakeholders needs". It would also be important to ensure transparency and traceability in the supply chains of solar panels due to the link with the use of forced labor in the solar panel industry in the Xinjiang region. The GEF Council should ensure that the implementing entity has sufficient mitigation actions in place to avoid the use of forced labour in its solar supply chain.

- Also, it would be important for the initiative to mention the problem of waste management from renewable energy equipment (solar panel, batteries, etc.). Without imposing all responsibility for waste management on the implementing partner, an analysis of how this will play out in the near future would be an important point to raise.
- Low productivity in the agricultural sector is one of the drivers for further land degradation, and the protection of productivity of the ecosystems is one of the key goals of the project. If possible, consider monitoring changes in agricultural productivity (either through SLM or solar-powered water pump system) and add an appropriate indicator e.g. a SDG indicator 2.3.1 Volume of production per labour unit by classes of farming / pastoral / forestry enterprise size (source: <https://www.fao.org/sustainable-development-goals/indicators/231/en/>)
- What is the added value of the publication of one peer-reviewed article to the protection of Ouadis ecosystems (Component 1)? There are better forms of knowledge production and sharing (e.g. workshops, training, demonstration sites, etc.) than the publication in a scientific journal if its objective is to inform land use mapping and local people's decisions on their activities. The publication can be welcomed to anyone who wants to study and contribute to the development of scientific knowledge but the fund should focus more on innovating education and training for local people.

✓ **Germany Comments**

GERMANY REQUESTS FOR THE FOLLOWING PROJECT THAT THE SECRETARIAT SENDS DRAFT FINAL PROJECT DOCUMENTS FOR COUNCIL REVIEW FOUR WEEKS PRIOR TO CEO ENDORSEMENT:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- In general, the PIF does not sufficiently describe the link between solar energy water pumping and how it can address the issue of land degradation. It is implied that solar powered water pumping is intended to provide water for irrigation so that land can be sustainably managed to restore land and prevent deserts from spreading. However, many details of the proposed approach remain unclear. The co-benefits between solar waterpumping, food security and LDN should be described explicitly and in more detail.
- Furthermore, the potential to align LDN targets and NDC targets to increase synergies in monitoring and reporting should be explored. A successful project approach shall include integrated planning for coordinated implementation of the UNCCD and the UNFCCC to ensure outputs that contribute to the achievement of multiple objectives regarding LDN, adaption to and mitigation of climate change.

- In addition, it shall be mentioned that by implementing LDN measures, carbon can be sequestered in soil and vegetation. An analysis of how SLM in the area contributes to lower greenhouse gas emissions could be included.
- SLM ("Sustainable Land Management") is mentioned many times, but not specified. Please elaborate in more detail which SLM techniques shall be deployed.
- The proposal also needs to take into account the PDP Kanem (Plan de Dvpt Regional) as well as the PDC (Plan de Dvpt Communal) of the targeted pilot communities.
- UNDP must inform the Comité Provincial d'Action (CPA) about the project measures planned and undertaken in Kanem Province to allow for the coordination of different humanitarian and development actors.
- The conflict prevention and economic aspects are mentioned, but in a very general way. For the economic aspect, it would be necessary to develop reflections on:
 - the agricultural value chain (Forecast: protection of 600 ha of production). How to sell these products and ensure harmonious economic development?
 - the (financial) motivation for the 3000 people who will contribute to the restoration of the land in the short but also medium term.
 - the strengthening/existence of local skills for the maintenance of these solar systems?
- Water resources management aspects shall be included throughout project planning and implementation, incl. capacity building measures ("use what you need").
- In Project Output 1.1 „A package of good SLM practises applicable to Ouadis restoration/protection” it should be considered to consult the WOCAT Database. Further, it should be ensured, that project findings are also uploaded on WOCAT to ensure knowledge transfer to similar projects.
- To advance a just and socially equitable energy transition Germany recommends that the aspect of employment promotion should be considered even more strongly in the project design, e.g. through the construction of wells and the installation and maintenance of solar panels.

In addition, we do have some questions with regard to the proposed project:

1. Feasibility:

- The project will focus on only 3 Ouadis (1 per commune) and provides for the restoration of 1500 ha (on average 500 ha per Ouadi).
 - Is such a surface really available around a single wadi?
 - Are the proposed 3000 people (women and men) to be engaged in the restoration of these lands sufficient (on average 1 person per 0.5 ha)? How do you plan to provide enough water for such a large surface?
 - How will environmental restoration work on remote surfaces (e.g. dunes) be envisaged? And how can it be ensured that land restoration continues in the medium term?

2. Stakeholders:

- The Association for the Development of the Region of Baga-sola ADERBA is listed as a participant of the project, although it is not the same province. Is this a mistake? Please elaborate.
- How will the project ensure that sufficient experts on SLM ("Sustainable Land Management") are available, especially technicians active at the provincial level?

3. Budget:

- 5,500,000 USD of the total project funds of 21,550,000 USD is expected to be contributed by the recipient country government or its subordinate institutions. In the current context, the availability of these state fund appears insecure (empty State fund, Chad declares food emergency).

✓ Switzerland Comments

- It is not clear to use how the Global CO2 emission savings as per PIF are derived. The number seems to be highly overestimated and unrealistic when related to direct emission reduction as stated. Even if indirect emission reduction is included, there will be very high uncertainty from estimating the impact of changed land management practices. Could the secretariat provide more details?
- A more detailed break-up of the project funding would be needed for assessing if fund allocation is efficient. Could such a break-up be provided?

NON-EXPEDITED ENABLING ACTIVITY

19. Global (Burkina Faso, Burundi, Central African Republic, Cameroon, Comoros, Congo DR, Gabon, Ghana, Kyrgyz Republic, Lesotho, Mongolia, Niger, Pakistan, Rwanda, Zimbabwe, Cote d'Ivoire, Ecuador, Eswatini, Fiji, Gambia, Guinea-Bissau, Mauritius, St. Kitts and Nevis, St. Lucia, Sierra Leone). Umbrella Programme for the Preparation of National Communications (NCs) and Biennial Transparency Reports (BTRs) to the UN Framework Convention on Climate Change (UNFCCC) (GEFID 10973). Agency: UNEP; GEF Project Financing: \$32,131,880; Co-financing: \$0.

✓ Canada Comments

- Canada supports the Umbrella Programme which would be the first to provide institutional support to improve climate management and governance for Cameroon/Gabon/DRC.