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COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS
ON THE JUNE 2022 LEAST DEVELOPED COUNTRIES FUND WORK PROGRAM

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

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**JUNE 2022 LDCF WORK PROGRAM (REFERENCE: GEF/LDCF.SCCF.32/03):
COMMENTS FROM COUNCIL MEMBERS**

STAND-ALONE FULL-SIZED PROJECTS

1. Comoros: Strengthening the Resilience of Climate-Smart Agricultural Systems and Value Chains (GEF ID 10997); GEF Agency: UNDP; GEF project financing: \$8,932,420; Co-financing: \$46,214,494.

✓ **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 aims to increase the climate resilience of key agricultural value chains through innovation, diversification and strengthened capacities to sustainably improve the livelihoods of smallholders and contribute to the national economy of the Union of Comoros. Germany appreciates the comprehensive focus on strengthening systemic, institutional, and individual capacities for enabling climate resilient agriculture in a sustainable manner, diversification of climate resilient value chains and the implementation of climate resilient practices in targeted areas. This is crucial as agriculture forms the backbone of the island state's economy, accounting for 48% of the country's GDP in 2017, accounting for major part of exports and employing 80% of the country's labor force.

Germany provides the following suggestions for improvements to be made during the drafting of the final project proposal:

- Germany appreciates the detailed description of climate change impacts faced by the country and the agriculture sector, and the associated threats to livelihoods. The adaptation rationale of the project is clear. In addition, the components as outlined in the proposal appear logical and comprehensive. However, more detailed information on the design and content of trainings on climate smart agriculture under Component 1, Output 1.1 would be helpful. While the strong focus on embedding trainings in existing curricula and building of soft skills, such as communication, are acknowledged, it would be useful to know more about the training content and the innovative media that can be used for its delivery. It would also be useful to understand how the outputs from Components 2, 3 and especially 4 can inform these trainings, if conducted on a rolling basis.
- Germany acknowledges the project's gender analysis component and preparation of a gender action plan to identify gender specific barriers. However, it is unclear how gender considerations will be specifically integrated into the project components and outputs. While the language around gender is assessment heavy, it is somewhat unclear what approaches are being proposed to specifically build women's adaptive capacity and empower them to make their own decisions and improve their socio-economic

conditions. For example, along with farmers' cooperatives, will all-women's self-help groups be set up to specifically address the identified gender barriers?

✓ **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 four-week review period.

2. Global: Accelerating investment in nature-based solutions (NBS) to help address climate adaptation in Least Developed Countries (LDCs) (GEFID: 10961); GEF Agency: World Bank; GEF Project financing: \$10,000,000 LDCF; Co-financing: \$6,280,000.

✓ **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 aims to increase the uptake of nature-based solutions (NBS) for addressing climate resilience and adaptation challenges across the World Bank portfolio. The program aims to achieve the objective through the development of targeted knowledge, tools and operational support modalities for task teams and their government clients. Germany appreciates the integration of relevant stakeholders to ensure cross-sectional knowledge management to enhance the pipeline of NBS investment in LDCs with adaptation and nature benefits.

Germany approves the following PIF in the work program. Suggestions for improvements to be made during the drafting of the final project proposal include:

- Germany approves of the aim to enhance the capacity of national governments to design and implement NBS. It further approves of the aim to indirectly support local communities through the development of a pipeline for NBS investments. To the extent feasible and recognizing that national-level stakeholders are the direct beneficiaries of the project, local / indigenous communities should also be consulted to identify NBS needs given that knowledge on NBS is often embedded at the local / indigenous levels. By involving local actors in policy/tool/knowledge product design at the national level, there will be a greater chance of uptake at the local level.
- Germany notes the list and description of technical initiatives and partnerships where the new project could collaborate and build synergies and suggests that during the final project preparation stage that the roles and contributions of these other initiatives be

more clearly defined and described. For example, the involvement of the University of Oxford's Nature-based Solutions Initiative (NBSI) could be clarified regarding how their research and valuation reaches local stakeholders in LDC governments. The descriptions of the City Resilience Program (CRP) and the Sub-national Climate Finance Initiative (SCF) do not provide much clarity on the link to the new project and how, for example, the CR Program's expertise and knowledge in the relevant LDCs can be used to build urban resilience and adaptation in the NBS space. Germany, therefore, again suggests engaging, to the extent feasible, with LDC local governments or to encourage LDC ministries to engage in multi-level governance solutions in their project development.

- Germany approves of the development of a gender engagement strategy and recommends developing targeted procedures in order to address the identified barriers and issues. For example, it is still unclear how the specified goal of 50% female participation in the foreseen training will be reached given the outlined structural challenges of women in many LDCs.
- It is very valuable to see that the approach shall benefit locals. Building on that approach we strongly suggest to integrate further environmental and social safeguards as a precondition for the implementation process to ensure the investments deliver benefits for people as well as for biodiversity and climate.
- There is no reference included that clearly defines what NbS are. We suggest to integrate a link to the UNEA resolution UNEP/EA.5/Res.5 (<https://www.unep.org/environmentassembly/unea-5.2/proceedings-report-ministerial-declaration-resolutions-and-decisions-unea-5.2>) to make sure its definition of NbS provides a solid basis for the project.

3. Madagascar: Upscaling Ecosystem-Based Adaptation for Madagascar's Coastal Zones (GEF ID: 10939); GEF Agency: UNEP; GEF project financing: \$7,105,936 LDCF; Co-financing: \$21,142,450.

✓ **Germany Comments**

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

Germany welcomes the proposal which aims to enhance the resilience of extremely vulnerable coastal communities of Madagascar to the adverse impacts of climate change. Germany acknowledges the way the interactions between climate change threats and the non-climate drivers of vulnerability are addressed and welcomes the focus on strengthening community ownership and acknowledges the establishment of strategic partnerships with private sector actors to strengthen resilient value chains and market access. In addition, Germany welcomes the adoption of highly participatory approaches for integrating EbA and good natural resources management practices into local development plans.

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

- Germany acknowledges the intent to embed this proposal into the multiple projects, which share a focus on improving the livelihoods of coastal communities of Madagascar through ecosystem-based approaches and resilience building. While Germany recognizes the value that the proposal adds to the landscape of individual projects and its complementarity to existing projects, it stresses the importance of establishing a knowledge sharing mechanism that allows for learning to be exchanged across all interventions, including the ongoing NAP process in Madagascar to strengthen the institutional capacity and policy and legislative framework for EbA in coastal zones.
- Germany would like to stress that land tenure issues are a decisive factor for local land use plans to be an effective tool for addressing environmental degradation. As the proposal points out, land conflicts, in particular those triggered by climate migration, and the widely used practice of slash and burn agriculture encroaching into the project intervention areas, may be a severe risk to the project. Regarding land tenure rights and land conflicts, the proposal is fully reliant on the progress of the World Bank project “Madagascar Agriculture Rural Growth and Land Management (CASEF)”, which aims to tackle the existing gender gap in women’s land rights by massive certification of land. While CASEF will contribute significantly to a systematic registration of land, it is doubtful that all land tenure conflicts will be solved by 2022 in the four projects areas. Hence, conflicts and disputes regarding state domain and untitled private property could considerably slow the project’s progress. Germany strongly encourages that the project clarifies how to address land tenure rights and land use conflicts.
- The identification of sources of long-term financing for the operation of the Regional Integrated Coastal Zone Management (ICZM) Committees and Locally Managed Marine Areas (LMMAs) from the public and the private sector will be key to ensuring their existence as a coordination platform for adaptation mainstreaming in coastal areas across Madagascar. Germany acknowledges the mentioning of potential innovative financing instruments in the proposal (e.g., partnering with equity funds that are supporting adaptation-oriented MSMEs) and encourages the exploration and inclusion of other new and existing financing experiences in the final proposal.
- Germany supports the project’s aim to establish a sustainable financing and investment platform for ecosystem-based businesses bringing together government, financial and MSME representatives. We would like to stress however the challenges with regard to competition and conflicting market interests that this may involve and would like to see these risks better addressed in the final proposal.
- Germany supports the concept of Locally Managed Marine Areas (LMMAs) and acknowledges that the proposed project will build on the existing experience in their implementation. We would like to stress the importance of integrating the lessons learned in the final project design, in particular on how to integrate the private sector in the process.

- Germany would like to ask for some formal improvements: Improve the readability of Problem tree (figure 7) and the Theory of change (figure 8) and add missing figures on the number of beneficiaries and communes of the PAZC and LDCF Project (page 27).

4. Niger: Strengthening the Resilience of Small Farmers through Climate Smart Agriculture Techniques in Tahoua Region (GEF ID: 11004); GEF Agency: UNDP; GEF project financing: \$8,932,420 LDCF; Co-financing: \$40,800,000.

✓ **Germany Comments**

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

Germany welcomes the proposal which aims to reduce food insecurity for small farmers in the Tahoua region by strengthening their resilience to climate change, using ecosystem restoration and climate-smart agriculture (CSA) techniques and technologies, and supporting the development of the private sector. Germany appreciates the dual approach to the recovery of degraded land in Tahoua by adopting Nature-based Solutions and conducting training programmes on ecosystem restoration practices and wood energy resource management (component 1) and by promoting and applying CSA (component 2). In addition, Germany supports the focus on the development of the private sector in local communities, in particular on women- and youth-led local Micro and Small Enterprises (MSEs) and entrepreneurs, in order to overcome barriers related to the limited access to funding from both - public and private sources (component 3).

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

- Germany supports the project's aim to particularly target women and youth. While the project proposal lays out how youth education campaigns will be conducted, e.g. through various channels, activities and media, it falls short on how women will be mobilised in local communities and become involved, i.e. through which specific women-focused activities. Any obstacles that could discourage women from participating – such as level of education and literacy, social rules, land tenure issues and conflict dynamics among communities, should be factored into the project, in particular into the capacity-building elements.
- Germany supports the Nature-based solution approach of the project. However, the proposal mentions that it may lead to the introduction of alien invasive species, a modification of existing ecosystems, the establishment of a monoculture that lacks biodiversity and true ecosystem function, and may damage natural habitats (i.e. small classified forests and potential cultural heritage sites). Germany recommends addressing these issues also during the education campaigns and sharing the assessment results of the research centers and ESIA (Environmental and Social Impact Assessment /Biodiversity Action Plan) and linking the results with indigenous agricultural knowledge.

- The proposal mentions the project risk of exacerbating existing discriminations against women and youth, as well as among women and youth, and suggests the certification and labelling of products produced and processed by women as a risk management measure. Germany suggests providing further information on the certification and labelling process considering that product certification based on robust, traceable criteria can be a lengthy and expensive process that will depend upon a functioning national quality infrastructure (standards-setting, accreditation entities, certifiers, etc.).

✓ **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 four-week review period.

5. Regional (Africa - Burkina Faso, Chad, Djibouti, Eritrea, Ethiopia, Mali, Mauritania, Niger, Senegal, Sudan): Great Green Wall Climate Change Adaptation Regional Support Project (GEF ID 11000); GEF Agency: IFAD; GEF Project Financing: \$ 8,932,420; Co-financing: \$29,878,600.

✓ **Germany Comments**

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

Germany welcomes the proposal which aims to increase knowledge management among member states of the Great Green Wall initiative, identify digital innovations and provide small grants for climate adaptation and resilience measures. Germany appreciates the focus on poor communities and farmers who are strongly impacted by the consequences of climate change. The proposal also seeks to address a number of barriers on adaptation including limited engagement of sectoral ministers and a lack of documentation of adaptation actions and its results.

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

- Germany supports the project's focus on documenting adaptation actions and creating evidence of adaptation results that can also be used by future project developments. Germany therefore strongly encourages the development of a State of Adaptation Report that spells out the adaptation activities and results from the Great Green Wall Initiative as proposed under component 1.

- Germany appreciates the intent to strengthen complementarity and collaboration between projects funded by the GCF and the GEF. In regard to the GCF project “The Africa Integrated Climate Risk Management Programme: Building the resilience of smallholder farmers to climate change impacts in 7 Sahelian Countries of the Great Green Wall (GGW)”, Germany seeks clarity whether the activities on knowledge management proposed under the GEF project’s first component are meant to cover knowledge sharing and learning from both projects, or if it is focused mainly on activities and information generated by the small grants activities of the GEF project.
- Germany acknowledges the importance of knowledge generation and sharing. However, the indicators proposed for component 1 do not capture the extent, quality and usefulness of knowledge exchange. Two of the proposed indicators (having all beneficiary countries involved and involving relevant GEF and GCF projects) only indicate a minimum of what would be expected from project partners and implementers. Germany therefore requests that the indicators of component 1 are further specified to enable an indication of useful knowledge exchange that can meet the project’s stated aim of creating evidence for future adaptation project development.
- Germany also acknowledges the importance of innovative solutions to address climate risks. However, the respective indicator “Number of innovations identified” is not nuanced enough to capture the usefulness and quality of the innovations. Germany therefore suggests adjusting the indicator, for example through a scorecard that distinguishes different types of innovations and different potential for upscaling.
- Component 3 proposes enhanced coordination between NDC/NAP implementation at the country level (output 1.1.3). While Germany acknowledges the importance of such coordination, several of the target countries already have support on NAP implementation from the GCF and other multilateral or bilateral donors including support from the NAP Global Network. Germany therefore seeks further information on how specifically the project would enhance such coordination through its activities to understand whether output 1.1.3 indeed constitutes a unique contribution to what is already being undertaken by existing support projects.

6. Regional: Africa African Climate Risk Insurance Facility-Derisking Adaptation to Climate Change in Africa (GEF ID 11008); GEF Agency: AfDB; GEF Project Financing: \$8,940,768; Co-financing: \$25,000,000.

✓ **Germany Comments**

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

Germany welcomes the AfDB’s proposal to enhance the uptake of climate-related disaster risk insurance amongst Regional Member Countries (RMCs) by strengthening the mandate of the African Climate Risk Insurance Facility (ADRFi) programme and the uptake of parametric insurance solutions. The creation of a guarantee facility to facilitate payments to The African Risk Capacity (ARC) on behalf of RMCs is an important element to bolster the ADRFi as a key

support vehicle in Africa. Germany also supports the efforts of AfDB to take on a stronger role in promoting climate-related disaster risk financing and management solutions in collaboration with ARC and beyond, as this aims to address the RMCs' appetite for insurance solutions at the micro, meso, and macro levels. The project intends, for example, to support the uptake of index insurance in agriculture by strengthening the capacities of local financial markets and insurers, to improve relevant frameworks, and to enhance access to risk analytics and related infrastructure.

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

- While the proposal intends to strengthen local insurance markets, support for ARC products seems to be the main aim. To ensure the sustainability of any capacity-building in support of risk and insurance literacy, especially amongst micro and meso level actors such as “local insurers, farmers, associations and cooperatives”, the proposal should consider promoting access to micro- or meso level index insurance products to address any insurance appetite the project may create. Such products may include those currently developed through other AfDB projects. The project should also align with efforts to build inclusive financial markets at the national level, e.g. by integrating fiscal and regulatory incentives into relevant frameworks.
- It is likely that micro and meso level insurance solutions will require (partial) premium support. Please clarify options for ADRiFi or other funds such as e.g., the IIF¹ to subsidize premium payments directly or indirectly. In terms of beneficiary selection and allocation of premium support, any reference to the InsuResilience Principles for Premium and Capital Support is welcomed.
- The indicated size of the guarantee facility is USD 4.5 million. Given the amount of countries' premium payments to ARC, please clarify how this amount was determined and whether it can be deemed sufficient to meet the objective of “cushioning inefficiencies in the preliminary years of implementation”. Additionally, more information is needed on the initial sources of guarantee facility financing and a resourcing strategy for replenishment over time.
- Please clarify whether the planned development of Disaster Risk Financing (DRF) Strategies is *additional to* or *in support of* already ongoing DRF strategy development activities under ADRiFi.

¹ <https://www.insuresilienceinvestment.fund/>

- Regarding capacity-building in the context of risk analytics and insurance literacy, please describe linkages with other initiatives, e.g., CREWS², the GRMA³ or MAP⁴.

7. Regional (Pacific - Kiribati, Solomon Islands, Timor Leste, Tuvalu): Blue Pacific Finance Hub: Investing in Resilient Pacific SIDS Ecosystems and Economies (GEF ID 10986); GEF Agency: ADB; GEF project financing: \$8,990,830; Co-financing: \$53,700,000.

✓ **Germany Comments**

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

Germany welcomes the proposal which aims to identify, prepare and finance investments that increase the resilience of Pacific coastal communities and ecosystems with primary focus on the four least developed countries (LDCs) mentioned above. LDCF funding is specifically requested for strengthening countries' capacity and governance to finance a climate-resilient blue economy, by identifying, preparing and financing blue economy projects, as well as disseminating knowledge on a climate-resilient blue economy, including through the establishment of the Blue Pacific Finance Hub. Germany acknowledges the necessity to ensure that Pacific coastal communities, marine and coastal economies, marine and coastal ecosystems become more resilient to climate change. Given the ocean's socioeconomic importance for the target countries, it is essential to ensure their resilience to climate change, which can be boosted by leveraging the post-COVID-19 "build back better" momentum across the region.

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

- The climate change impact section would be strengthened by a stronger emphasis on historical climate change and associated impacts in the target countries, as the current focus is mostly on projected climate change.
- As a climate change project, the rationale for funding needs to specifically focus on how LDCF-funded activities will increase the countries' resilience to climate-related impacts. The environmental considerations (overfishing, plastics, pollution) need to be presented as compounding issues in a climate change context and addressed as a result of the project's co-benefits and not core activities.
- It would be beneficial to describe stakeholder engagement mechanisms for the project identification process, ensuring multiple stakeholders (public and private sector, civil

² <https://public.wmo.int/en/climate-risk-and-early-warning-systems-crews#:~:text=The%20specialized%20Climate%20Risk%20and,the%20world's%20most%20vulnerable%20countries.>

³ <https://www.v-20.org/our-voice/news/press-releases/german-government-enhance-sovereign-risk-and-resilience-insight-in-partnership-with-the-insurance-development-forum-and-v20-climate-vulnerable-countries> and <https://www.v-20.org/our-voice/news/press-releases/v20-group-and-the-idf-call-for-joint-collaboration-and-international-support-to-strengthen-global-physical-climate-risk-management-capabilities>

⁴ <https://careclimatechange.org/multi-actor-partnership-climate-and-disaster-risk-finance-in-the-context-of-the-insureilience-global-partnership-igp/>

society) are involved and share their on-the-ground knowledge of blue economy-related needs to address climate change in their country.

- To the extent that this is possible, project beneficiaries' estimated numbers should be disaggregated by gender to highlight the gender benefits.
- The indigenous populations' climate vulnerability should be accounted for, both in terms of climate impacts and how these will be addressed under the project.
- It would be useful to clarify the loan leveraging process under the Hub, as it will only provide grants, especially as leveraged finance is estimated to rise to USD 500m by 2030.
- It would be useful to identify projects for scale-up and replication from the ADB's Ocean Pipeline for the Pacific region (2022-2024) that could feed into the national and regional ocean-climate adaptation investments to be identified under this project.

8. Tuvalu: Ecosystem Based Adaptation for Improved Livelihood in Tuvalu (GEF ID: 10926); GEF Agency: UNEP; GEF project financing: \$4,416,210; Co-financing: \$5,485,645.

✓ **Germany Comments**

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

Germany welcomes the proposal which aims to reduce vulnerability to climate change through adaptive agricultural practices and ecosystem management in Tuvalu, with a focus on *pulaka* (giant swamp taro) cultivation as part of subsistence farming.

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

- The proposed ecosystem-based adaptation (EbA) measures seem appropriate but rather general in nature and should be further specified during the PPG stage. In this context it is essential that all project activities, EbA and technological solutions, are based on current and projected climate change information. For instance, while the proposal refers to sea level rise (SLR) and aims to address its impacts, it remains unclear, what level of SLR the *pulaka* cultivation as planned in the proposal would withstand. Germany therefore requests assurance that all project activities consider relevant climate change impacts, and that available climate change information, including projections on SLR, are fully incorporated into the project design.
- The proposed project aims to support 4,200 people as direct beneficiaries, thereby targeting the whole rural population of the country. While Germany appreciates the aim to benefit as many people as possible, it does not seem likely that the whole rural population would be direct beneficiaries, or, for instance, take part in the trainings offered by the proposed project (see PIF p. 15, Number of people trained 4,300). We suggest adjusting the figures for a more feasible account of actual direct beneficiaries.

- Finally, Germany agrees with the additional recommendations of the GEF Secretariat (see PIF review p. 29), especially on the importance of including a safe disposal plan for the material planned to be used in the *pulaka* pits, as well as consulting with vulnerable communities and indigenous peoples during the PPG stage and fully integrating their perspective and knowledge into the project design.