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COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS
ON THE GEF TRUST FUND FEBRUARY 2024 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 February 2024 Work Program

TABLE OF CONTENTS

INTEGRATED PROGRAMS	1
1. Global (Colombia, Eswatini, Ethiopia, Guinea, Indonesia, Kenya, Malawi, Mexico, Mozambique, Nepal, Paraguay, Philippines, Thailand, Uganda, Zambia). Wildlife Conservation for Development Integrated Program (GEF ID 11148). Agencies: World Bank (lead), ADB, CI, IUCN, UNDP, UNEP, WWF-US. GEF Program Financing \$ 135,002,132; Co-financing \$ 892,098,548.....	1
2. Global (Angola, Argentina, Benin, Bhutan, Burkina Faso, Chad, Chile, China, Costa Rica, Ecuador, Eswatini, Ethiopia, Ghana, Grenada, India, Kazakhstan, Kenya, Malaysia, Mexico, Namibia, Nauru, Nigeria, Pakistan, Peru, Philippines, Solomon Islands, South Africa, Sri Lanka, Tanzania, Türkiye, Uganda, Indonesia). Food Systems Integrated Program (FS IP) (GEF ID 11214). Agencies: FAO and IFAD (leads), IUCN, UNDP, World Bank. GEF Program Financing: \$ 252,162,398; Co-financing: \$ 2,201,647,507.....	2
3. Regional (Guyana). Amazon Sustainable Landscapes Program Phase 3 – Addendum Council Meeting Feb 5, 2024. (GEF ID: 11337) Agency: FAO, World Bank. GEF Program Financing: \$3,519,722. Co-financing: \$20,800,000.	6
4. Global (Grenada, Jordan, Madagascar, Maldives, Mexico, Moldova, Panama, Peru, Sri Lanka, St. Kitts and Nevis, Thailand, Trinidad and Tobago, Venezuela, Viet Nam). Clean and Healthy Ocean Integrated Program (CHO IP) (GEF ID 11349). Agencies: FAO (Lead), ADB, CAF, EBRD. GEF Program Financing: \$100,338,691; Co-Financing: \$748,061,993.....	7
5. Regional (Guinea-Bissau, Togo). Guinean Forests (GEF-8 Amazon, Congo and Critical Forest Biomes Integrated Program) Addendum (February 2024). (GEF ID: 11391). Agency: CI, FAO, IUCN. GEF Program Financing: \$10,112,013; Co-financing: \$45,500,000.....	9
6. Global (Malaysia, Nepal, Philippines, Suriname, Ukraine). Greening Transportation Infrastructure Development (GRID) (GEF ID 11467). Agencies: World Wildlife Fund-US (lead), ADB, UNEP. GEF Program Financing: \$ 23,794,476; Co-financing: \$ 408,915,662.....	9
OTHER PROGRAMMES	10
7. Global (Algeria, Ecuador, Egypt, Malaysia, Namibia, Nigeria, Philippines, South Africa). Global Clean Hydrogen Programme (GEF ID 11437). Agency: UNIDO. GEF Program Financing: \$13,129,820; Co-financing: \$141,196,891.....	10

8. Regional (Kazakhstan, Kyrgyz Republic, Tajikistan, Turkmenistan, Uzbekistan). Central Asia Water and Land Nexus (CAWLN) for Ecosystem Restoration, Improved Natural Resource Management and Increased Resilience (GEF ID: 11378). Agency: FAO; GEF Project Financing: \$26,007,810; Co-financing: \$335,504,935.....	10
STAND-ALONE FULL-SIZED PROJECTS.....	11
BIODIVERSITY	11
9. South Africa. Reimagining National Parks for People and Nature - Mega Living Landscapes Project (GEF ID: 11347). Agency: WWF-US; GEF Project Financing: \$8,874,312; Cofinancing: \$55,080,000.....	11
10. Ecuador. Acción Páramos: conservation, restoration and sustainable use of the páramos in Ecuador (GEF ID: 11386). Agency: UNEP; GEF Project Financing: \$4,416,210; Cofinancing: \$25,190,068.....	12
11. Argentina. Inclusive Conservation, Restoration, and Sustainable Use of Biodiversity in Priority Ecoregions (GEF ID: 11394). Agency: UNDP; GEF Project Financing: \$5,279,452; Co-financing: \$39,200,000.....	12
12. Paraguay. Strengthening the System of Protected Areas and Improvement of its Financial Sustainability (GEF ID: 11449). Agency: CI; GEF Project Financing: \$5,079,358; Co-financing: \$12.248,000.....	12
CLIMATE CHANGE MITIGATION	13
13. Antigua and Barbuda. Energy resilience and security for the residential and public sector in Antigua and Barbuda (GEF ID: 11474). Agency: UNDP; GEF project financing: \$8,393,151; Co-financing: \$20,132,229.....	13
LAND DEGRADATION	13
14. Argentina. Recovering the Sustainability of Ecosystems Affected by Drought in Northeastern Argentina (GEF ID: 11336). Agency: UNDP; GEF Project Financing: \$2,913,700; Co-financing: \$20,000,000.....	13
15. Lebanon. Restoring Ecosystem Connectivity for Biodiversity and Sustainable Livelihoods in the Litani Watershed Project (ECONNECT) (GEF ID: 11348). Agency: IFAD; GEF Project Financing: \$2,929,935; Co-financing: \$9,024,240.....	13
16. Tunisia. Adaptive management and restoration of degraded Aleppo pine forest in the Kasserine governorate (Tunisia) to strengthen resilience to climate change, conserve biodiversity, improve productivity and food security (GEF ID: 11389). Agency: FAO; GEF Project Financing: \$2,639,726; Co-financing: \$29,300,000.....	13

CHEMICALS AND WASTE	14
17. India. Accelerating Transition to a Circular Economy in India’s Electrical and Electronic Sector through Sustainable Integrated Approaches (GEF ID: 11405). Agency: UNDP; GEF Project financing: \$ 15,000,000; co-financing: \$105,000,000.	14
18. Cote d'Ivoire. Sound management of polychlorobiphenyls in Cote d’Ivoire, phase II - objective 2028 of the Stockholm Convention. (GEF ID: 11420). Agency: UNIDO; GEF Project Financing: \$4,150,000; Co-financing: \$25,000,000.....	16
19. Indonesia. Polychlorinated Biphenyls-free Indonesia: Financing a shift to more efficient energy systems through the elimination of related waste and contaminated equipment. (GEF ID: 11425). Agency: UNIDO; GEF Project Financing: \$7,245,000; Co-financing: \$50,800,000.	17
20. Morocco. Eliminating hazardous chemicals from the supply chain of the construction sector in Morocco. (GEF ID: 11428). Agency: UNIDO; GEF Project Financing: \$6,000,000; Co-financing: \$42,000,000.....	17
21. Tajikistan. Integrated Program for HFC Phasing Down and Sustainable Cooling for Tajikistan (GEF ID 11430). Agency: UNDP; GEF Project Financing: \$5,185,900; Co-financing: \$36,550,000.	17
22. Uruguay. Towards a more circular Uruguay (Uruguay + Circular) (GEF ID: 11434). Agency: UNDP; GEF Project Financing: \$ 2,639,726; Co-financing: \$ 28,300,000.	18
23. Argentina. Integrated Management for Sustainable Reduction (IMSRed) of POPs, Highly Hazardous Pesticides, and industrial chemicals in Argentina (GEF ID: 11451). Agency: UNDP; GEF Project Financing: \$9,240,000; Co-financing: \$ 46,400,000.	18
INTERNATIONAL WATERS.....	18
24. Regional (Argentina, Bolivia, Brazil, Paraguay, Uruguay). Implementation of the La Plata Basin SAP priorities through regional and national actions. (GEF ID: 11053). Agency: CAF; GEF project financing: \$10,605,000; Co-financing: \$ 221,300,000.	18
25. Regional (Malawi, Mozambique, Tanzania). Strengthening integrated transboundary source-to-sea management of the Ruvuma River Basin and its coastal zones to ensure ecosystem health and livelihood security (GEF ID: 11410). Agency: IUCN; GEF project financing: \$ 7,122,018; Co-financing: \$ 48,365,000.....	18
26. Regional (Comoros, Madagascar, Mozambique). Program for improving sustainable marine fisheries opportunities in SADC – The Case of the Mozambique Channel. (GEF ID: 11452). Agency: AfDB; GEF Project Financing: \$ 5,250,000; Co-financing: \$ 14,200,000.	18

MULTI-FOCAL AREA PROJECTS.....	19
27. Regional (Cambodia, Lao PDR, Viet Nam). Enhancing transboundary fisheries management in the Lower Mekong Basin (GEF ID 11304). Agency: IUCN; GEF Project Financing: \$10,709,176; Co-financing: \$77,600,000.	19
28. Mongolia. Rehabilitating and conserving the mountain landscapes in Khangai region of Mongolia for improved ecosystem services and community livelihoods (GEF ID 11114). Agency: FAO; GEF Project Financing: \$2,639,726; Co-financing: \$25,000,000.	19
29. Sri Lanka. Promoting sustainable economic benefits through the conservation of critical biodiversity and ecosystem services in the Eastern Coastal Region of Sri Lanka (GEF ID 11116). Agency: UNDP; GEF Project Financing: \$4,507,534; Co-financing: \$26,500,000.	20
30. Brazil. Restoration of Wetlands and other important Amazonian Ecosystems – Capacity building, innovation, development and technological transfer for ecological restoration and climate change mitigation (GEF ID 11167). Agency: FAO; GEF Project Financing: \$5,000,000; Co-financing: \$40,910,000.	20
31. Lesotho. Sustainable Wool and Mohair Value chain Competitiveness project (WaMCoP) (GEF ID 11210). Agency: IFAD; GEF Project Financing: \$5,329,452; Co-financing: \$67,444,000.	20
32. Regional (Cambodia, Lao PDR, Viet Nam). Enhancing transboundary fisheries management in the Lower Mekong Basin (GEF ID 11304). Agency: IUCN; GEF Project Financing: \$10,709,176; Co-financing: \$77,600,000.	20
33. South Africa. Restoration and sustainable management of Land for improved livelihoods in the degraded landscapes of Free State and Northwest Provinces of South Africa (GEF ID 11331). Agency: IUCN; GEF Project Financing: \$5,399,954; Co-financing: \$21,790,120.	21
34. Viet Nam. Enhancing biodiversity conservation and reducing climate vulnerability in Central Vietnam for sustainable development utilizing a landscape approach (GEF ID 11395). Agency: WWF-US; GEF Project Financing: \$9,000,000; Co-financing: \$73,000,000.	21
35. Tajikistan. Tajikistan Ecosystem Restoration and Resilient Agriculture (TERRA) Project (GEF ID: 11398). Agency: IFAD; GEF Project financing: \$8,019,178; Co-financing: \$11,978,050.	22
36. Indonesia. Lake Ecosystem Restoration in Indonesia through Integrated Governance, Landscape, and Community-based Approaches. (GEF ID: 11422). Agency: IFAD; GEF Project Financing: \$7,105,936; Co-financing: \$35,000,000.	22

37. Iraq. Restoration and Preservation of Key Biodiversity Areas and Ecosystems in Anbar Province, Iraq. (GEF ID: 11426). Agency: UNDP; GEF Project Financing: \$ 5,722,146; Cofinancing: \$45,900,000.....	22
38. Colombia. BioSouth: The Pacific-Andean-Amazonian Ecological and Cultural Connectivity Corridor (GEF ID: 11432). Agency: UNDP; GEF Project Financing: \$13,736,697; Cofinancing: \$69,060,096.....	22
39. Timor Leste. Improving wetlands management for biodiversity and improved humanwildlife coexistence. (GEF ID: 11435). Agency: CI; GEF project financing: \$ 2,689,908; Cofinancing: \$12,007,025.....	23
MULTI-TRUST FUND	23
40. Cambodia. Building climate resilience of communities in Cambodia’s protected landscapes: biodiversity-friendly crop-livestock systems for adaptation (GEF ID 11400); GEF Agency: FAO; GEF project financing: \$1,782,040 (GEF Trust Fund) and \$6,237,138 (LDCF); Co-financing: \$21,500,000.	23
41. Dominican Republic. Land Degradation Neutrality for Increased Resilience to Climate Change in Dominican Republic (GEF ID 11402); GEF Agency: FAO; GEF project financing: \$1,766,485 (GEF Trust Fund) and \$2,649,727 (SCCF); Co-financing: \$15,156,920.	23
NON-GRANT INSTRUMENT.....	23
42. South Africa. Private Sector Energy Efficiency Programme Phase 2 (PSEEP2) (GEF ID: 11064) Agency: DBSA; GEF Project financing: \$14,678,968; Co-financing: \$509,000,000.....	23
43. Regional. Innovative use of financial instruments for Biodiversity Conservation and Restoration in Latin America and the Caribbean (GEF ID: 11324). Agency: IADB; GEF Project financing: \$40,180,000; Co-financing: \$641,280,000.	24
44. Global. IFC/GEF Green Global Supply Chain Decarbonization Platform (GEF ID: 11326). Agency: World Bank; GEF Project financing: \$14,678,899; Co-financing: \$150,600,000.....	24
45. Brazil. Living Amazon Mechanism (GEF ID: 11327). Agency: Funbio. GEF Project financing: \$6,200,000; Co-financing: \$46,600,000.....	25

**FEBRUARY 2024 GEFTF WORK PROGRAM (REFERENCE: GEF/C.66/04):
COMMENTS FROM COUNCIL MEMBERS**

INTEGRATED PROGRAMS

- 1. Global (Colombia, Eswatini, Ethiopia, Guinea, Indonesia, Kenya, Malawi, Mexico, Mozambique, Nepal, Paraguay, Philippines, Thailand, Uganda, Zambia). Wildlife Conservation for Development Integrated Program (GEF ID 11148). Agencies: World Bank (lead), ADB, CI, IUCN, UNDP, UNEP, WWF-US. GEF Program Financing \$ 135,002,132; Co-financing \$ 892,098,548.**

✓ **Switzerland Comments**

Assessment

- The program description reflects well the realities and the diversity of needs and challenges in the recipient countries and eco-regions. The four components and their actions are logical and comprehensive. However, the following considerations are unclear or need further attention:
- Expected GEF funding and the range of identified key project actors seem inadequate to address one of program's innovative elements – the zoonotic risk. The links between wildlife and zoonotic diseases and risks – related to use, trade, human-wildlife interactions or shrinking habitats - are well explained and justified. But acting on them will likely require a wider range of actors (health, veterinary services, educational entities, mass media), more funding and the involvement of science / labs. If such expansion is difficult, it is better to set certain program limits/frame ambition and consider ways of interactions with and engagement of other relevant stakeholders and funders.
- The role of local CSOs and local communities seems marginal or unclear despite the statements on stakeholder engagement. Several international CSOs are mentioned as executing entities (some are GEF agencies), and several CSOs are mentioned in co-financing table. The program could benefit from greater recognition and involvement of CSOs in all four project components: they play or can play an important role in anti-poaching campaigns, habitat management, community education and behavior change as well as income diversification. They could be involved through small grant programmes, as knowledge brokers and agents of change.
- While component 4 on Coordination and Knowledge Exchange includes a number of useful activities on experience and knowledge exchange, reporting and coordination, it seems to lack the involvement of local civil society, media and educational entities as important actors in dissemination in local languages among local communities and at country level. In an era of information saturation and user fatigue (users rarely go to websites or may get lost in abundance or complexity), it is important to act and disseminate information in a targeted, creative and proactive manner, where CSOs and activists could be helpful. Otherwise, the exchange and reporting will remain limited to government-to-government or international fora. Ideally, science info on wildlife monitoring needs to be better linked to policy and actions: Component 4 can help in this.

- While Components 1 and 2 are strongly linked to governmental actors, Component 3 Wildlife for Prosperity is mainly linked to communities and the private sector - new economic opportunities and benefits from conservation. Some of the expected activities - such as wetlands and carbon credits - are more related to climate / other biodiversity actions, less to wildlife. If trophy hunting is involved, the potentially high risk of corruption in this luxury and niche business should be carefully assessed and avoided.

✓ **United States Comments**

- On page 19, could the “Updated Tiger Action Plan for Thailand” be officially titled for clarity? It is unclear which document is being referenced and if it is an update to the 2010-2022 Action plan?

✓ **Denmark/Norway Comments**

General comment for projects in Mozambique:

- Mozambique has approx. 15 bi- and multilateral partners within the area of Blue economy, oceans and fisheries. The Mozambican Ministry of the Sea, Inland Waters and Fisheries has limited resources. It can be challenging to follow up and engage in donor collaboration, in addition to core business. It is important to discuss how the programmes give value added, in addition to all other ongoing collaboration programmes in this sector.
- Several of the projects have components that focus on community projects and sustainable improvement, based on alternative resources. Very many projects take this approach in MOZ. Experience shows that when funding has terminated and the project pulls out, it is difficult to see sustainable results.
- How will the project work in order to secure that changes and improvements are sustainable and long-lasting?

2. **Global (Angola, Argentina, Benin, Bhutan, Burkina Faso, Chad, Chile, China, Costa Rica, Ecuador, Eswatini, Ethiopia, Ghana, Grenada, India, Kazakhstan, Kenya, Malaysia, Mexico, Namibia, Nauru, Nigeria, Pakistan, Peru, Philippines, Solomon Islands, South Africa, Sri Lanka, Tanzania, Türkiye, Uganda, Indonesia). Food Systems Integrated Program (FS IP) (GEF ID 11214). Agencies: FAO and IFAD (leads), IUCN, UNDP, World Bank. GEF Program Financing: \$ 252,162,398; Co-financing: \$ 2,201,647,507.**

✓ **Switzerland Comments**

Assessment

- The program components and ambitions could benefit from further elaboration, in particular less global ambitions, more realistic plans in relation to the available budget and geographic coverage. Global context and description of the program could be reduced in line with the GEF-recommended size/template, while information on focus countries and target food systems (livestock, crops, commodities, aquaculture), and work areas (especially 1 and 2)

could be further refined, with focus on pragmatic measures, some risks reevaluated and duly considered.

✓ **United States Comments**

- The United States appreciates the opportunity to review this integrated program and looks forward to reviewing the associated child projects in the future. In particular, we would like to better understand the role of the Global Coordination Project and how it will promote the “synergies” described in the PDF. We’d also like to see how the M&E plan will identify outputs directly associated with this program. As written, many of the outputs are not necessarily indicative of the interventions provided and guided by the GCP.

✓ **Denmark/Norway Comments**

Overall comments:

- While the programme encompasses a holistic approach to transform the global food systems, along the whole value chain approach including business models, incentives and finance frameworks and policy and institutional conditions, the programme suggests doing this by a traditional value chain approach. An approach that has been in effect in the EU for several years now with very little evidence of success, despite the resource richness of the involved farmers, producers, businesses, consumers and involved countries and governments.
- A “Whole food system” implies considering a holistic approach to the particular geography, biosphere, environment, geopolitical and economic landscape to achieve an overall goal of climate smart, integrated and climate and economically resilient systems but instead of working with the framework around these systems, to influence towards targeting these frameworks, to ensure their support of the whole food system, the funnel is working in the opposite direction, trying to work with narrow target areas. In choosing specific value chains, one ignores the changing world and lacks future proofing of the project. While palm oil, livestock ect. are the crops of today, technology, changing trade patterns, political priorities or consumer patterns can change the production at a whim, rendering the child projects progress obsolete.
- Choosing instead to work with the frameworks, the geographic, biological, political, economic possibilities in the child projects would enable testing innovative solutions and new technology for sustainability. For example, the best solutions for cleaning polluted water may very well be independent of which crop is grown or production undertaken in a geographical area and may instead be dependent on factors like rainfall, flooding, drainage etc. Working on moving from chemical pesticides to biocide may be less impacted by the type of crops grown and more dependent on the fact that systems are in place globally to approve chemical pesticides while each new biocide has to be approved by every single country, to import it, making the implementation of a shift from chemical to biocide lengthy and costly. The viability of upscaling new, climate resilient and indigenous foods may be hampered by the fact that they are not tradeable outside each country due to the fact that there is no standard for them in the Codex Alimentarius, which has traditionally focused on the mainstream, intensively grown and produced food systems. In the same manner, tariffs and economic support for farmers biases towards certain systems irrespectively of the type of crops grown.

- For the project to succeed the importance of handling policies, leadership (Public and Private) and governance cannot be underestimated. It is crucial that the responsibility for the climate protection transitions from a policy and governance level to a private sector level leaving policymakers and governance with the role of making the policies and control of the private sector compliance.
- Considering the scope of the project, the actual mass of land impacted seems very low and whether this can achieve the desired “tipping point” is doubtful.

Questions:

- How does the project address the food system architecture stacking against the SMEs and low-income countries?
- Does the project address the fact that farming systems worldwide are dominated by an ageing and in low income countries often uneducated workforce that lacks means of gaining knowledge and often are driven by cultural practices?
- How will the project address the fact that the “silo” or cluster ideology is present not only in receiving countries but also very much in the donor countries and organizations and if this is not addressed, how will it be implemented effectively at the receiving end? (41) And under this topic how will the project address barriers within (43) and the demand driven ongoing intensification of the food systems from the western countries as well as the fast rising demand from the East?

Comments for the Kenya child project:

- We recommend that IFAD reaches out to the Danish Embassy in Nairobi for further coordination and information sharing. In Kenya, Denmark has a strategic approach to the food sector incorporating governance and policy through the SSC project, agriculture and financing through the bilateral programmes, AgriFI and MESPT as well as a close collaboration with the trade council on climate smart solutions, private sector involvement through the East African office of DI and the DFC on research and capacity building.
- Other development partners would be the FAO and possibly the WFP considering their diversification into food safety and procurement. On a country base SIDA has good insights into relevant Counties for the chosen value chains. For trade Solidaridad and Trade Marks Africa are relevant to ensure market access.
- To be successful relevant Competent Authorities have to be involved at National level and in the chosen counties it would be beneficial to enter through the Council of Governor’s agricultural secretariat and for implementation to work with their Climate Change Units whose work can be aligned with Flocca.
- It is worth considering whether a program of this magnitude should be implemented in a cross cutting environment rather than on value chain alone. Into the planning the trade relations with China on fish and the middle-east on livestock should be taken into consideration.

Comments for the Burkina Faso child project:

- Programme level : Important to focus on both technical assistance and investments.

- It is highly relevant to invest in sustainable/nature positive food systems in Burkina Faso.
- The project is in line with national priorities regarding the preservation of biodiversity and climate change. In 2015, Burkina Faso adopted its National Adaptation Plan for climate change with a global objective of ensuring the conservation and management of natural resources in a sustainable manner. The transition government of Burkina Faso also adopted an operational plan 2023-2025, focusing on 8 strategic priority value chains including maize, rice, livestock and fish which are supported by the child project.
- Many complementarities with our bilateral engagements – the FS-IP has a structural dimension and works on a national level. Potential for many synergies with bilateral engagements on community resilience, value chains and private sector.
- SP-CNDD is an underfinanced department of the Ministry of Environment, Water and Sanitation. It would be worth considering how SP-CNDD can best be supported to take leadership as program executing entity to ensure the necessary cross-ministerial coordination.
- Burkina Faso is undergoing a security crisis. We encourage GEF and IUCN to continue their support and programming in fragile and conflict affected contexts like Burkina Faso and to emphasize conflict sensitivity in programme design and implementation. In the programme risk matrix on p.67 the political and governance risk is considered low in general, while it is acknowledged that the risk might be higher on a country-specific basis. This needs to be taken into account in child project formulation.
- We would like IUCN to follow up with the Danish Embassy on relevant areas. Of special interest for the embassy would be:
- The ideas and experiences regarding nature-based solutions, private sector role and incentives to preserve and regenerate nature/biodiversity/ecosystems.
- Questions: Given the challenging current political context in Burkina Faso, how does GEF plan to address the fiduciary risks of working with state-structures? What kinds of safeguards are envisaged for the FS-IP?

Comments for the Indonesia child project:

- We recommend that FAO reaches out to the Danish Embassy in Jakarta for further coordination and information sharing. The sector cooperation programme of the embassy currently is engaged in the following activities, which may be relevance to the Child project targeting livestock in Indonesia:
- Organic Dairy – improving framework conditions for organic dairy production through capacity building in the dairy sector and knowledge sharing about animal disease control.
- Food Loss & Waste – Reducing food loss and waste throughout the value chain through 1) improved framework conditions, 2) knowledge sharing for resources efficient agriculture and food production, processing and transportation and 3) initiatives to drive behavioural change in consumers.

3. Regional (Guyana). Amazon Sustainable Landscapes Program Phase 3 – Addendum Council Meeting Feb 5, 2024. (GEF ID: 11337) Agency: FAO, World Bank. GEF Program Financing: \$3,519,722. Co-financing: \$20,800,000.

✓ **Denmark/Norway Comments**

- Potential program synergies and stakeholder engagement: FAO Guyana have since 2018 received funding from the Guyana REDD+ Investment Fund (GRIF) to implement the “Sustainable Land Management and Development (SLDM)-project” in coordination with Guyana Lands and Surveys Commission (GLSC). The SLDM-project is due to end in July 2024. We’d encourage the implementing partner FAO to consider how to take advantage of and/or build on work done in the SLDM- project for the ASL-program in Guyana.
- Stakeholder engagement: Other GEF Agencies listed are UNDP, WWF-US and CI, in addition to FAO. These organizations have local chapters in Guyana too, and we strongly encourage a stakeholder engagement plan to include meetings with these actors with the aim to identify potential synergies with other programs/projects.
- Similarly, further details on how Guyana’s Environmental Protection Agency (EPA) as the executing entity will engage other relevant government stakeholders would be beneficial. We note that the Guyana Lands and Surveys Commission is not referred to among the sources of co-financing, and wonder whether this entity’s potential role in the project has been considered.
- Set-up of biodiversity credits: For this workstream we’d strongly support the analysis of lessons learned from Guyana’s work with the benefit-sharing mechanism for carbon credits described in the country’s Low Carbon Development- strategy (LCDS). We encourage the implementing partner to pay special attention to considerations and risks regarding indigenous people’s rights and the importance of FPIC in the policy-elaboration.
- Risk analysis: The outlined risks to program outcomes refer to the program at a regional level. As such, country-specific risks are not assessed, but several of the identified risks seem relevant to Guyana. It would be worth paying particular attention to the social risks related to the biodiversity credits, assessment of required FPIC processes (differing views between CSO/indigenous organizations and the government), and partnerships with non-governmental organizations.
- Other project components: It is unclear what the “regional collaboration”- component of the ASL-program objective entails. (This might be further described in Annex H “Child project information” but this and other annexes were not available for review).
- It would be desirable to include a definition of “sustainable land and water management”- practices and “sustainable production” to be implemented, to compare working definitions and focus with those of other projects/programs, like the SLDM- project (ref. above) and EU-led programs in the field.
- We encourage the implementing partner to pay attention to the set-up of the Project Management Unit and secure proper staffing “in-house” to avoid depending to extensively on external consultants. It could be worth considering including representatives from other

relevant government agencies in the PMU or in the project steering committee to promote greater cross-sectorial collaboration, ownership to ASL and synergies to other projects.

- We support the suggestions of the revised STAP screening from June 2023 to reflect relevant aspects of the Kunming-Montreal Global Diversity Framework in the program.

4. Global (Grenada, Jordan, Madagascar, Maldives, Mexico, Moldova, Panama, Peru, Sri Lanka, St. Kitts and Nevis, Thailand, Trinidad and Tobago, Venezuela, Viet Nam). Clean and Healthy Ocean Integrated Program (CHO IP) (GEF ID 11349). Agencies: FAO (Lead), ADB, CAF, EBRD. GEF Program Financing: \$100,338,691; Co-Financing: \$748,061,993

✓ **Switzerland Comments**

Assessment

- The Program proposes to meaningfully tackle marine hypoxic zones and associated environmental impacts in 14 countries representing nine large marine ecosystems. It expects to leverage interests and skills of a set of critical global institutions whilst building upon opportunities of a cohort of national Child Projects. The Program is in an initial stage of preparation particularly as regards to a comprehensive stakeholder analysis, cooperation mechanisms among/across Child Projects, existing baseline, gender assessment and action plan, identification of co-benefits, Child Project alignment, climate risk assessment, and targets setting for core indicators.
- The Program's core impact indicators encompass 943,444 ha of marine/terrestrial protected areas created or under improved management, 7,903,744 ha other landscapes and marine habitats under improved practices, 96,712 ha of land and ecosystems under restoration as well as 9,188,000 tons GHG emissions mitigated, with 616'752'000 people benefitting (50.9% women) and expects to achieve a range of co-benefits such as enhanced food security, better human health, strengthened resilience to the negative impacts of coastal degradation, and improved employment opportunities, income, livelihoods gender equality and social inclusion.

Open questions

- What exactly is the potential number of direct and indirect beneficiaries of the Program in the countries/regions/globally? (The brief descriptions of the child projects hint (qualitatively / in percentages) to the population targeted nationally, and there is only a consolidated quantitative estimation of the "population benefitting from GEF-financed investment" at Global Coordination Project level.)
- How does the Program ensure / what kind of mechanisms are foreseen on the child projects to Leave No One Behind more broadly/systematically? The document only makes a strong case for collaboration with the health and water, sanitation, and hygiene (WASH) sectors to assess the water and sanitation needs of vulnerable and indigenous groups, so they can be empowered to take on new roles and participate in nutrient pollution mitigation agendas.
- Which are the experiences and lessons learned from past similar Integrated Programs building on a cohort of national Child Projects? Insights from comparably multi-faceted endeavors in

their identification, deployment and monitoring would be a valuable addition to the Program Framework Document.

- What are the real prospects of the sustainability of the knowledge platforms and communities of practice put in place can be brought forward in six years? Knowledge platforms and communities of practice often reach a certain degree of maturity and self-perpetuation after a decade of substantial efforts only.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We noted the ministries listed in the PIF are not fully up to date and we ask the PIF be updated to reflect the current names of the ministry partners.

✓ **Denmark/Norway Comments**

- This program addresses an important issue that affects the ocean's health, e.g. marine hypoxia. This is an expanding environmental crisis that deteriorates global ocean health, including biodiversity loss, degraded ecosystem services, and associated socio-economic harm. This is happening in Vietnam as well, with deterioration of coral reefs in coastal areas and water resources in urban areas including Hanoi. For instance, Hanoi metropolitan authority has banned floating restaurants, which were identified to be key causes of massive death of fish in West Lake. However, this remains a gap for Vietnam in terms of awareness, policy framework and best management practices and cross-border cooperation. The GEF financing aims to enhance water management and compliance to address hypoxia caused by nutrients, and other pollutants, into the Gulf of Tonkin (Vietnam) with total budget of US\$ 4.16 million. It is therefore relevant for Vietnam and complimentary to Norway's on-going support in blue ocean economy, climate change adaptation and marine plastic pollution combat.
- FAO is a long-term and reliable partner in Vietnam. We therefore support them. However, while FAO is a strong technical agency, their cross-sector coordination and governance capacity seems relatively limited as our UN-REDD experience in Vietnam showed. We would like to emphasize the importance of ensuring that FAO and all other agencies involved in the implementation of the program are aware of their responsibility to coordinate and avoid overlap with existing and ongoing processes. This should be mandatory reporting back to the GEF from FAO as the GEF Agency for CHO-IP.
- Deoxygenation is a large concern worldwide and the loss of oxygen is pronounced in the open ocean, occurring in coastal waters, enclosed seas and fjords. We assume that there is existing research confirming the status of hypoxia in the identified areas where the program is planning to work. In order to follow the development and expected improvement of oxygen levels in these zones during implementation of the program, there is a high need to have research with solid baselines in place, documenting and enabling M&E.

5. **Regional (Guinea-Bissau, Togo). Guinean Forests (GEF-8 Amazon, Congo and Critical Forest Biomes Integrated Program) Addendum (February 2024). (GEF ID: 11391). Agency: CI, FAO, IUCN. GEF Program Financing: \$10,112,013; Co-financing: \$45,500,000.**

No comments received

6. **Global (Malaysia, Nepal, Philippines, Suriname, Ukraine). Greening Transportation Infrastructure Development (GRID) (GEF ID 11467). Agencies: World Wildlife Fund-US (lead), ADB, UNEP. GEF Program Financing: \$ 23,794,476; Co-financing: \$ 408,915,662.**

✓ **Switzerland Comments**

Assessment

- The project is directed towards addressing an environmentally important topic requiring immediate action, with significant potential environmental impact. This includes the urgent need to protect and restore ecosystems and biodiversity, as well as to enhance the quality of life for local communities.
- The selected countries appear well-suited for the project, given the presence of strong political will, which is essential for its success. Moreover, these countries are experiencing a high demand for the development of new transportation infrastructures. However, the current situation in Ukraine should be considered in project planning.
- The proposal lacks a detailed plan for the implementation of each child project and the allocation of budgetary resources. This gap hampers the clarity regarding how the project will be executed and if/how funds will be utilized efficiently.

Open questions

- The main question(s) concerns the organization of child projects, in particular:
- What target does each child project follow?
- What measures and which infrastructures are planned?
- What targets do the child projects need to meet regarding the indicators suggested for the monitoring?
- How will the child projects be organized? How is the stakeholders process organized?
- In the child projects, the focus is either on ports or roads/highways. Why are railways not included? To pursue a holistic sustainable approach, it would make sense to promote those modes of transport that are land-efficient when implementing sustainable transport infrastructure.
- Are current technological developments considered when planning the new infrastructures? For roads, one should for example consider autonomous driving and the necessary technical enhancements for connectivity (V2X) as well as charging infrastructure and smart maintenance.

- Are there political measures within the countries in which the child projects are planned that could conflict with the intended results of the project? If such conflicts exist, what steps are being taken to resolve them?
- How will the committee deal with the current geopolitical situation in Ukraine? How does this impact the project? Will post-war infrastructure reconstruction play a role?

OTHER PROGRAMMES

7. **Global (Algeria, Ecuador, Egypt, Malaysia, Namibia, Nigeria, Philippines, South Africa). Global Clean Hydrogen Programme (GEF ID 11437). Agency: UNIDO. GEF Program Financing: \$13,129,820; Co-financing: \$141,196,891.**

No comments received.

8. **Regional (Kazakhstan, Kyrgyz Republic, Tajikistan, Turkmenistan, Uzbekistan). Central Asia Water and Land Nexus (CAWLN) for Ecosystem Restoration, Improved Natural Resource Management and Increased Resilience (GEF ID: 11378). Agency: FAO; GEF Project Financing: \$26,007,810; Co-financing: \$335,504,935.**

✓ Switzerland Comments

Assessment

- Overall, the program presents a number of weaknesses on the level of design, governance and required funding for scalability and replicability.

Open questions

- What incentive mechanisms will be created to enable the implementation of Integrated Watershed Management framework on the farmer and forest owner level?
- The sub regional IWM coordination projects are not well laid out. What exactly will the proposed activities on the sub-regional level be/look like?
- No information is provided about how the national water and land management policy updates will prohibit or limit large water consuming agricultural and forestry activities, which are the key drivers of water shortage. This aspect should be covered in the proposal.
- What are the selection criteria for the national Child Projects and how to they take into consideration the water land interdependencies (e.g. degraded land in watersheds), relation of SLM, LDN focused Child Projects to WLN?
- The project in Turkmenistan will catalyze Nature-Positive Transformation of the agricultural sector. What is the definition of FAO for Nature-Positive and related activities? Will it tackle fertilizer, pesticide use and their lobbying industries?
- The impact indicators (ha land restored / under improved management, tCO2e mitigated, # of people benefitting) could be more concise in terms of how they relate to IWM and

biodiversity What type of land will be restored, how will the land be selected (public, private land?), management practice on the selected land in the past 20 years? How can this figure be increased?

- How well equipped is the International Fund for Saving the Aral Sea, Program partner, currently to drive policy change work in the region and make the proposed project a success?
- Enforcement of regulation is a known barrier to effective and sustainable land, water and natural resource management. How far will the project consider this challenge?
- The program states that it will have a vertically integrated gender strategy to benefit women. Please include women focused monitoring indicators into the M&E plan.
- Executing agencies/partners for the child projects: how and when will they be selected and how they will interact, what are their roles and responsibilities?
- What is the private sector's role in financing the scaling up of the child projects business models? How will the private sector be involved into the project design from the onset?
- Will FAO provide the remote sensing EO data and tool to the private sector, farmers? How?
- A significant driver for the degradation of the hydrological regime is the hydropower energy generation. This is not being addressed as part of the solution, besides integrating the CAWEP Energy-water-land nexus project in Central Asia.

STAND-ALONE FULL-SIZED PROJECTS

BIODIVERSITY

9. South Africa. Reimagining National Parks for People and Nature - Mega Living Landscapes Project (GEF ID: 11347). Agency: WWF-US; GEF Project Financing: \$8,874,312; Cofinancing: \$55,080,000.

✓ United States Comments

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rationale for receiving GEF funding.

✓ Denmark/Norway Comments

- The Application states that the stakeholder engagement has been excellent (page 29). However, it seems like Indigenous Peoples and Local communities have not been consulted (page 31, page 11 section 3)?
- The Application provides a good background in general to the key problems behind conservation and social-/economic development, however it doesn't clearly describe the main reasons to why the 3 project-areas are currently not being well managed. A bit more background information for these areas specifically would be beneficial.

- This would also provide more information to the logic behind the ToC and outcomes which are, in part, not fully clear (ex. page 19 section Outcome 1.1, page 21 Component 2).
- There are three main components of this project. Regarding component 3 “Increase knowledge sharing on the benefits of Mega Living Landscapes (MLL) amongst society”. Is there already extensive knowledge about MLL’s positive benefits that can be shared at the start of the project, or will the potential benefits of this specific project be shared? If the latter, the project needs to carefully monitor the “benefits” and have a plan for how to communicate results as the project is ongoing (real-time Monitoring, Evaluation and Learning).
- Risk mitigation strategies: there is not sufficient description of how to mitigate mentioned risks.
- Annex E: Rio markers: the project is marked as significant (1) for Biodiversity. Shouldn’t the project be marked as principle (2)? (The OECD-definition of principal is “an activity can be marked as principal when the objective (biodiversity) is explicitly stated as fundamental in the design of, or the motivation for, the activity.”)

10. Ecuador. Acción Páramos: conservation, restoration and sustainable use of the páramos in Ecuador (GEF ID: 11386). Agency: UNEP; GEF Project Financing: \$4,416,210; Cofinancing: \$25,190,068.

No comments received.

11. Argentina. Inclusive Conservation, Restoration, and Sustainable Use of Biodiversity in Priority Ecoregions (GEF ID: 11394). Agency: UNDP; GEF Project Financing: \$5,279,452; Co-financing: \$39,200,000.

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rationale for receiving GEF funding.

12. Paraguay. Strengthening the System of Protected Areas and Improvement of its Financial Sustainability (GEF ID: 11449). Agency: CI; GEF Project Financing: \$5,079,358; Co-financing: \$12,248,000.

No comments received.

CLIMATE CHANGE MITIGATION

13. Antigua and Barbuda. Energy resilience and security for the residential and public sector in Antigua and Barbuda (GEF ID: 11474). Agency: UNDP; GEF project financing: \$8,393,151; Co-financing: \$20,132,229.

✓ **United States Comments**

- The United States is supportive of the objectives of this project. We do want to ensure, however, that due diligence is conducted on all parts of the solar supply chain. We ask that potential suppliers provide supply chain mapping down to polysilicon and ensure they don't use suppliers where credible evidence exists of use of forced labor.

LAND DEGRADATION

14. Argentina. Recovering the Sustainability of Ecosystems Affected by Drought in Northeastern Argentina (GEF ID: 11336). Agency: UNDP; GEF Project Financing: \$2,913,700; Co-financing: \$20,000,000.

No comments received.

15. Lebanon. Restoring Ecosystem Connectivity for Biodiversity and Sustainable Livelihoods in the Litani Watershed Project (ECONNECT) (GEF ID: 11348). Agency: IFAD; GEF Project Financing: \$2,929,935; Co-financing: \$9,024,240.

No comments received.

16. Tunisia. Adaptive management and restoration of degraded Aleppo pine forest in the Kasserine governorate (Tunisia) to strengthen resilience to climate change, conserve biodiversity, improve productivity and food security (GEF ID: 11389). Agency: FAO; GEF Project Financing: \$2,639,726; Co-financing: \$29,300,000.

✓ **United States Comments**

- The United States appreciates the opportunity to review this document. We would like to better understand how this project will mitigate security risks associated with this project, including risks of terrorism, IEDs, and unexploded ordances.

CHEMICALS AND WASTE

17. India. Accelerating Transition to a Circular Economy in India's Electrical and Electronic Sector through Sustainable Integrated Approaches (GEF ID: 11405). Agency: UNDP; GEF Project financing: \$ 15,000,000; co-financing: \$105,000,000.

✓ Japan Comments

Overall comments:

- Addressing WEEE and increasing its circularity is critical to address pollution from e-waste and reduce associated carbon and environmental footprints. We welcome this project, which has a potential to contribute to such objectives. However, there are some concerns on the project design that should be addressed.

Comments:

- Project structure:
 - Addressing the design and production is critical to reduce environmental impacts by the electronics sector. At the same time, e-waste recycling and management are also essential to reduce concerned chemicals including POPs. Strengthening this aspect including on Components 1 and 3 will help the project achieve the objectives. Also, it is not clear if the level of funding on Component 2, which is quite vague at this point, is necessary given that this is technical assistance component, compared with Component 3 with investment. The total funding amount should be reviewed accordingly.
- Finance:
 - Grant of co-financing is envisaged of \$60,000,000 as an investment in circular design. However, it is not clear how it is related to the implementation of the project, as they would invest under the regulation without the intervention of the project. Explain how the project will actually mobilize financing as grant. Also, no grant or public/private loan is expected around the recycling and treatment of e-waste. This should be added to this project, including public financing support to recycling and ESM of e-waste, on top of the product design part.
 - In terms of GEF financing, the GEF grant allocation should be carefully reviewed, based on the revised project structure.
- Component 1:
 - E-waste recycling and management should be more focused, in addition to the eco-design.
 - Regulatory approaches on eco-design and e-waste recycling and management: Importing EU's approach with minor modification in this sector may not be as effective as expected. Taking into account the past experience in India is critical. Learning from successful e-waste recycling and management models in Asia with a similar condition helps the project achieve objectives in the implementation.

- Financial instruments/mechanisms: As public financial support will be a key driver of ESM of e-waste, this should be elaborated and clarified during the preparation phase.
- Component 2:
 - It is not clear how this component will address the product design, production process, and collection of used EEE through pilot projects. Intervention plan with OEMs should be carefully designed before the implementation, with close coordination with Component 1. Scope including types of EEE and targeted chemicals should be more clarified.
- Component 3:
 - Strategies on how to scale recycling and ESM of e-waste in India in line with E-waste regulations and Component 1, mobilizing the informal sector, should be developed, including on large and small scale facilities with targeted e-waste and quantity. Types of e-waste to be recycled and treated should be more clarified in pilot projects assuming this model will target small scale facilities involving the informal sector.
 - How the GEF grant is used to invest in a pilot project should be more clarified.
- Indicators:
 - While understanding the uncertainties of types and quantity of e-waste the project will address and chemicals avoided in the production phase through the project interventions, targeted chemicals and hazardous materials should be more elaborated.
- Safeguards:
 - Environmental and social risks are categorized as moderate. First, these should be separated into two distinguished categories. Second, depending on what types of e-waste (and associated hazardous materials) and types of treatment technologies, which are not identified yet, environmental and health risks can be significant. Third, inclusion of the informal sector is a key to successful implementation of the project. It is not clear how the project will mitigate the impact on the informal sector through formalization of e-waste management businesses.
- Gender aspects:
 - While gender-sensitive approaches are highlighted throughout the document, no analysis is shown on what roles women are playing differently in from the production design phase to e-waste management phase. Beneficiaries (men/women) should be also revised accordingly.
- ✓ **Denmark/Norway Comments**
 - Circular economy and waste management is high on agenda in India. Electrical and electronic sector is contributing significant waste and it is increasing significantly as the Indian electronics industry has been growing at a compound annual growth rate of about 18% in the last decade.

- India is the third largest generator of e-waste. The large quantities of e-waste, having hazardous substance, poses risks to humans, our environment and to sustainable economic growth of the country.
- About 95 % e-waste handling and management is through informal processes, which are crude and unscientific. This leads to release of harmful chemicals into air and soil.
- If treated scientifically, the e-waste can be a good resource as some precious metals and some scarce metals can be recovered from this waste stream.
- Of late, India has brought out regulations for handling and treatment of waste and e-waste, including extended producers responsibility. Implementation of these policies is however very inadequate. This is due to several factors such as lack of awareness among people, lack of skills among those responsible for handling and management of e-waste, lack of infrastructure and last but not the least, shortage of funds with the authorities responsible.
- The project under consideration aims at knowledge creation, awareness raising, capacity building, strengthening institutional mechanisms, identification of best available technologies and investments and also implementing a few pilot projects. This shall hopefully fill some of the gaps that exist in the e-waste management sector in India and hopefully equip India in better management of e-waste.
- The project is thus very relevant for India.
- The implementing agency of the project with the Ministry of Environment and Forests, Government of India is the appropriate authority that brings out rules and regulations for management of waste and e-waste, in particular. They shall be able to bring in other relevant stakeholders in the project implementation process. The Norwegian Embassy is cooperating with the Ministry of Environment, Forests and Climate Change on Circular economy issues and is in dialogue with them regarding a global treaty on plastic pollution prevention. We have in our cooperation with the Ministry of Environment, Forests and Climate Change, seen that the capacity can be a bit limited, and therefore it is promising that the Ministry seeks assistance from the GEF regarding e-waste.
- The project document is well drafted, giving a good account of background conditions in India regarding the waste and e-waste, the gaps in the sector and required intervention.
- The results framework includes quantitative indicators regarding residual plastic disposal, removal or disposal of POPs, mercury, GHG emission mitigation, etc.
- A detailed assessment of risks has been carried out, including its rating. Gender dimension have also been sufficiently integrated into the project activities and results.

18. Cote d'Ivoire. Sound management of polychlorobiphenyls in Cote d'Ivoire, phase II - objective 2028 of the Stockholm Convention. (GEF ID: 11420). Agency: UNIDO; GEF Project Financing: \$4,150,000; Co-financing: \$25,000,000.

No comments received.

19. **Indonesia. Polychlorinated Biphenyls-free Indonesia: Financing a shift to more efficient energy systems through the elimination of related waste and contaminated equipment. (GEF ID: 11425). Agency: UNIDO; GEF Project Financing: \$7,245,000; Co-financing: \$50,800,000.**

No comments received.

20. **Morocco. Eliminating hazardous chemicals from the supply chain of the construction sector in Morocco. (GEF ID: 11428). Agency: UNIDO; GEF Project Financing: \$6,000,000; Co-financing: \$42,000,000.**

No comments received.

21. **Tajikistan. Integrated Program for HFC Phasing Down and Sustainable Cooling for Tajikistan (GEF ID 11430). Agency: UNDP; GEF Project Financing: \$5,185,900; Co-financing: \$36,550,000.**

✓ **Switzerland Comments**

Overall judgment

- The PIF is of very high quality, the planned elimination of Hydrofluorocarbons (HFCs) is well documented and calculated. The project approach and the four components of intervention are logic and are proven in many similar projects of the Montreal protocol. The theory of change is plausible and coherent.

Comments:

- The project has very ambitious targets for the elimination of the use of Hydrofluorocarbons (HFCs) in the cooling and air-conditioner sector of the country. During the PPG phase of the project, a well-defined monitoring system with clear and strict milestones should be developed, including a plan on how to monitor the progress of the project during and after the implementation.
- The co-financing of the project is mainly in kind and grants. To have at the end of the project reliable information about the real situation, a good monitoring needs to be in place.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We had a series of questions regarding to current capacity with Tajikistan. In particular:
- Is there already an HFC recycling system in Tajikistan, or is this project looking to establish one?
- How large a need is there to acquire tools/equipment/portable devices to recover HFCs? Equipment that is used to recover other types of refrigerants such as CFCs and HCFCs or even hydrocarbons (HCs) are generally able to be used for HFCs as well.
- How will the “cooling as a service” business model developed under this output be used? Does Tajikistan plan to use “cooling as a service” as a strategy in any particular region, or conduct a pilot program?

- 22. Uruguay. Towards a more circular Uruguay (Uruguay + Circular) (GEF ID: 11434). Agency: UNDP; GEF Project Financing: \$ 2,639,726; Co-financing: \$ 28,300,000.**

No comments received.

- 23. Argentina. Integrated Management for Sustainable Reduction (IMSRed) of POPs, Highly Hazardous Pesticides, and industrial chemicals in Argentina (GEF ID: 11451). Agency: UNDP; GEF Project Financing: \$9,240,000; Co-financing: \$ 46,400,000.**

No comments received.

INTERNATIONAL WATERS

- 24. Regional (Argentina, Bolivia, Brazil, Paraguay, Uruguay). Implementation of the La Plata Basin SAP priorities through regional and national actions. (GEF ID: 11053). Agency: CAF; GEF project financing: \$10,605,000; Co-financing: \$ 221,300,000.**

No comments received.

- 25. Regional (Malawi, Mozambique, Tanzania). Strengthening integrated transboundary source-to-sea management of the Ruvuma River Basin and its coastal zones to ensure ecosystem health and livelihood security (GEF ID: 11410). Agency: IUCN; GEF project financing: \$ 7,122,018; Co-financing: \$ 48,365,000.**

No comments received.

- 26. Regional (Comoros, Madagascar, Mozambique). Program for improving sustainable marine fisheries opportunities in SADC – The Case of the Mozambique Channel. (GEF ID: 11452). Agency: AfDB; GEF Project Financing: \$ 5,250,000; Co-financing: \$ 14,200,000.**

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We noted the ministries listed in the PIF are not fully up to date and we ask the PIF be updated to reflect the current names of the ministry partners.

✓ **Denmark/Norway Comments**

General comment for projects in Mozambique:

- Mozambique has approx. 15 bi- and multilateral partners within the area of Blue economy, oceans and fisheries. The Mozambican Ministry of the Sea, Inland Waters and Fisheries has limited resources. It can be challenging to follow up and engage in donor collaboration, in

addition to core business. It is important to discuss how the programmes give value added, in addition to all other ongoing collaboration programmes in this sector.

- Several of the projects have components that focus on community projects and sustainable improvement, based on alternative resources. Very many projects take this approach in MOZ. Experience shows that when funding has terminated and the project pulls out, it is difficult to see sustainable results.
- How will the project work in order to secure that changes and improvements are sustainable and long-lasting?

Comments:

- The PIF states: “Over-fishing in Mozambique is mainly due to the use of destructive fishing practices and the degradation of the ecosystems. The main destructive fishing practices in Mozambique include the use of inappropriate fishing gears such as mosquito nets, gill nets, traps and poison. These practices do not discriminate between 12/1/2023 Page 20 of 104 species and they also destroy the habitats. Beach seine fishery harvests adults and juveniles of both small and large species. Generally, catches of small and juvenile shrimp outweighs those of adult shrimps.”
- This is relevant for artisanal and coastal fishing. However, this statement should be questioned, as there is also a big challenge related to IUU and industrial fishing, as the country has very limited capacity and resources to engage in MCS (Monitoring, Control and Surveillance).
- How will the Program approach the challenges regarding IUU and industrial fishing?

MULTI-FOCAL AREA PROJECTS

27. Regional (Cambodia, Lao PDR, Viet Nam). Enhancing transboundary fisheries management in the Lower Mekong Basin (GEF ID 11304). Agency: IUCN; GEF Project Financing: \$10,709,176; Co-financing: \$77,600,000.

No comments received.

28. Mongolia. Rehabilitating and conserving the mountain landscapes in Khangai region of Mongolia for improved ecosystem services and community livelihoods (GEF ID 11114). Agency: FAO; GEF Project Financing: \$2,639,726; Co-financing: \$25,000,000.

No comments received.

- 29. Sri Lanka. Promoting sustainable economic benefits through the conservation of critical biodiversity and ecosystem services in the Eastern Coastal Region of Sri Lanka (GEF ID 11116). Agency: UNDP; GEF Project Financing: \$4,507,534; Co-financing: \$26,500,000.**

No comments received.

- 30. Brazil. Restoration of Wetlands and other important Amazonian Ecosystems – Capacity building, innovation, development and technological transfer for ecological restoration and climate change mitigation (GEF ID 11167). Agency: FAO; GEF Project Financing: \$5,000,000; Co-financing: \$40,910,000.**

✓ **United States Comments**

- The United States recommends coordination with the Ministries of Environment, Finance, and Indigenous Rights, as they all have important equities in restoration projects.

- 31. Lesotho. Sustainable Wool and Mohair Value chain Competitiveness project (WaMCoP) (GEF ID 11210). Agency: IFAD; GEF Project Financing: \$5,329,452; Co-financing: \$67,444,000.**

No comments received.

- 32. Regional (Cambodia, Lao PDR, Viet Nam). Enhancing transboundary fisheries management in the Lower Mekong Basin (GEF ID 11304). Agency: IUCN; GEF Project Financing: \$10,709,176; Co-financing: \$77,600,000.**

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We note that the proposed project bears similarities to an activity that the Southeast Asia Fisheries Development Center (SEAFDEC) is undertaking with USAID funding, including developing an inland fisheries management plan. We would therefore recommend that the project implementers closely coordinate with SEAFDEC.

✓ **Denmark/Norway Comments**

- With total GEF's financing of US\$ 12 million, the project aims to improve the management of cross-sector trade-offs and to harmonize national/regional fisheries management. This will make substantial contributions to the safeguarding of food security of local communities as well as to the conservation of globally significant biodiversity in Lower Mekong countries, e.g., Cambodia, Laos, Vietnam (CLV), and possibly Thailand.
- The project is highly relevant for the Lower Mekong region and Vietnam particularly, as a downstream country of the Mekong River. The Lower Mekong region is the world's largest inland fishery and the third most biodiverse river system in the world after the Amazon and Congo (and by far the most biodiverse relative to size). Among nearly 1,200 fish species in this region, there are several globally threatened species that are on the IUCN Red List.

- Importantly, the project addresses root causes of transboundary water management in Mekong region, including hydropower development and hydrological fragmentation, unsustainable exploitation of the fish and fisheries, land use change and wetlands degradation, lack of integrated transboundary fisheries resources management, limited climate change adaptation initiatives etc. While IUCN is the right coordinating agency, it would be crucial to include responsible ministries in all countries to make sure they can negotiate and reach consensus in transboundary water resource management. Currently, selected agencies vary across the three countries, for instance, Ministry of Agriculture, Forest and Fisheries in Cambodia, Mekong Commission in Laos and Research Institute of Aquaculture in Vietnam. Maybe there is strong reason for this difference that could be clarified.
- The rationale is to maintain river integrity, fish stocks and biodiversity at 2020 levels to sustain livelihoods and food security, through improved transboundary fisheries management. At the same time, it is stated that “Hydropower development has had major considerable transboundary impacts on the river ecosystem and aquatic biota” and that one of the key problems is poorly planned hydropower development. There are other environmental issues which will also impact the river, including climate change, but the impact of hydropower dams is expected to far outweigh impacts arising from changing climate. It is not evident how the project will contribute to address this key challenge, including the ownership status of the large dams on other tributaries.

33. South Africa. Restoration and sustainable management of Land for improved livelihoods in the degraded landscapes of Free State and Northwest Provinces of South Africa (GEF ID 11331). Agency: IUCN; GEF Project Financing: \$5,399,954; Co-financing: \$21,790,120.

No comments received.

34. Viet Nam. Enhancing biodiversity conservation and reducing climate vulnerability in Central Vietnam for sustainable development utilizing a landscape approach (GEF ID 11395). Agency: WWF-US; GEF Project Financing: \$9,000,000; Co-financing: \$73,000,000.

✓ **United States Comments**

- On page 36, please ensure that Target 4 on human-wildlife conflict includes all species also listed in “National Program on Conservation of Endangered and Rare Wildlife species prioritized for protection until 2030, with a vision to 2050”.

✓ **Denmark/Norway Comments**

- The project promotes new approaches in unlocking investment resources and addressing the root drivers of biodiversity loss. There seems to be good continuation and linkages with previous projects/initiatives with regional collaboration. WWF is coordinating agency in partnership with MONRE, which is responsible for biodiversity conservation in Vietnam. These are relevant partners. However, it is crucial to engage MARD, which is mandated to manage forestry, protected areas, and forestry carbon credits as well as local communities and private sector in this process.

35. Tajikistan. Tajikistan Ecosystem Restoration and Resilient Agriculture (TERRA) Project (GEF ID: 11398). Agency: IFAD; GEF Project financing: \$8,019,178; Co-financing: \$11,978,050.

✓ **Switzerland Comments**

- It is recommended that in further developing the project, to put more emphasize on biodiversity outcomes to justify its multi focal ambitions.
- Further, strengthening collaboration with local governments, which is not explicitly mentioned in the PIF, could help secure sustainability of project outcomes by rooting and anchoring project activities within the administration.
- The co-financing of the project by the beneficiary is modest and in terms of recurrent expenditures (in kind) coming from the annual recurrent budgets of the regular program of the Committee of Environmental Protection. Other ministries and agencies involved in the project (e.g., agriculture, forestry, water resources) do not seem to contribute resources. It is recommended to broaden the base of co-financing to ensure the ownership of the project by the Government.

36. Indonesia. Lake Ecosystem Restoration in Indonesia through Integrated Governance, Landscape, and Community-based Approaches. (GEF ID: 11422). Agency: IFAD; GEF Project Financing: \$7,105,936; Co-financing: \$35,000,000.

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rational for receiving GEF funding.

37. Iraq. Restoration and Preservation of Key Biodiversity Areas and Ecosystems in Anbar Province, Iraq. (GEF ID: 11426). Agency: UNDP; GEF Project Financing: \$ 5,722,146; Cofinancing: \$45,900,000.

No comments received.

38. Colombia. BioSouth: The Pacific-Andean-Amazonian Ecological and Cultural Connectivity Corridor (GEF ID: 11432). Agency: UNDP; GEF Project Financing: \$13,736,697; Cofinancing: \$69,060,096.

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rational for receiving GEF funding.

39. Timor Leste. Improving wetlands management for biodiversity and improved humanwildlife coexistence. (GEF ID: 11435). Agency: CI; GEF project financing: \$ 2,689,908; Cofinancing: \$12,007,025.

No comments received.

MULTI-TRUST FUND

40. Cambodia. Building climate resilience of communities in Cambodia's protected landscapes: biodiversity-friendly crop-livestock systems for adaptation (GEF ID 11400); GEF Agency: FAO; GEF project financing: \$1,782,040 (GEF Trust Fund) and \$6,237,138 (LDCF); Co-financing: \$21,500,000.

✓ **United States Comments**

- The United States appreciates the opportunity to review this project. We would like to see additional information on risk mitigation for other non-climate related threats in Prey Lang, including illegal logging, snaring/wildlife trafficking, land grabs, and economic land concessions.
- We note that the collaborators listed on the project do not have significant experience in Prey Lang, and we would like to better understand how these collaborators will apply their knowledge to this unique and complicated region.
- The descriptions of the Boeung and Prey Lang Wildlife Sanctuaries would benefit from a brief description and background on the endangered and protected species that reside in these sanctuaries.

41. Dominican Republic. Land Degradation Neutrality for Increased Resilience to Climate Change in Dominican Republic (GEF ID 11402); GEF Agency: FAO; GEF project financing: \$1,766,485 (GEF Trust Fund) and \$2,649,727 (SCCF); Co-financing: \$15,156,920.

✓ **United States Comments**

- If appropriate, we would also encourage that the drought and flood preparedness measures considered under Outcome 2.2 also include preparedness in urban and semi-urban areas.

NON-GRANT INSTRUMENT

42. South Africa. Private Sector Energy Efficiency Programme Phase 2 (PSEEP2) (GEF ID: 11064) Agency: DBSA; GEF Project financing: \$14,678,968; Co-financing: \$509,000,000.

No comments received.

43. Regional. Innovative use of financial instruments for Biodiversity Conservation and Restoration in Latin America and the Caribbean (GEF ID: 11324). Agency: IADB; GEF Project financing: \$40,180,000; Co-financing: \$641,280,000.

✓ **United States Comments**

- All biodiversity is important for nature conservation. There is not an internationally recognized definition for megadiversity and thus it should not be included as a rationale for receiving GEF funding.

✓ **Denmark/Norway Comments**

Overall Comments:

- Although there is big potential in this project in terms of finance for nature, there are weaknesses/criticism that has been raised against “Debt for Nature Swaps”. The criticism involves for example the lack of transparency when the deals are negotiated/finalized, and that the government of the country involved does not have the competence needed to negotiate the deals in the most favorable way for the country.
- How is transparency being promoted in this project?
- How will the project strengthen the governments competencies in this area to make sure the deals are negotiated on the most equal terms (as this is not part of the eligibility/selection criteria)?

Comments:

- Efficiency: Another critic against these Debt for Nature is that it is not always the most efficient forms of support for conservation. How shall efficiency be analyzed prior to implementation? This question is also linked to the National Biodiversity Finance Plans that several countries have developed and/or will be developed.
- Monitoring, Evaluation and Learning: Component 3 of the Program (Knowledge component) is important given that we need more information about these kinds of instruments and its financial and environmental performance. Further, linked to previous comments, it is critical that there is an external evaluation looking also at the debated elements of Debt for Nature Swap of relevance for this project to gain more knowledge.

44. Global. IFC/GEF Green Global Supply Chain Decarbonization Platform (GEF ID: 11326). Agency: World Bank; GEF Project financing: \$14,678,899; Co-financing: \$150,600,000.

No comments received.

45. Brazil. Living Amazon Mechanism (GEF ID: 11327). Agency: Funbio. GEF Project financing: \$6,200,000; Co-financing: \$46,600,000.

✓ **Denmark/Norway Comments**

- General: The project document presents a good description of the situation and on what the program will contribute to, in addition to justify the need of the project. The project addresses a very central agenda that needs innovative solutions and is in desperate need for finance. We appreciate that the focus on socio-biodiversity and supply chain includes the recognition of the role local communities play to impede deforestation and forest degradation.
- Theory of change: The project document includes an elaborated theory of change that shows a well-thought planning.
- Project's two components: The project document states that "The combined action of the project's two components offers synergies that make it possible to create a virtuous circle of capacity-building, advance financing, and structural investment that strengthens sustainable value chains.". There is however no explanation on how this will be possible.
- Cultural dimension: On page 19, the project document mentions "Cultural barriers of communities afraid of taking credit in the market." It is VERT, one of the three institutions, that will address this barrier. VERT is described as an institution specialized in capital market experience, track record and experience with small market. The project document presents no information of VERT's experience in dealing with communities in that region. Is this aspect been taken into account?
- Partners: We see as positive a model that includes both cooperatives and the private sector in a bottom-up approach, and we appreciate a good presentation of the three institutions in the project document: VERT, Funbio and Natura. However, it seems to lack information on how they will work together/cooperate in a concrete way. The project document mentions more than 20 years of experience with this approach, but little information/reference is to be found on this approach: it is stated that the partners are capable and complementary of working on all front of the project without explain how.
- Off-taker: According to the project document the institution "Natura" operates as an off-taker and investor but also ensures the viability of its business model by sharing investments and risks. The Norwegian Embassy in Brazil has good track record and experience with the off-taker "Natura" and this is valued positively. However, more information explaining the double role of Natura both as a financial supporter (investor) and off-taker should be included. Are there any Control mechanisms on off-takers that ensure that there will not be conflict of interests?
- Other initiatives: We appreciate the inclusion on cooperation with ongoing initiatives. However, we could wish to see a description on how the program will relate (synergies/overlapping) to existing platforms/programs and potential partners as the Amazon sustainable landscape impact programme (financed by GEF through a GEF-6) and Norway's International Climate and Forest Initiative's (NICFI) supported program COPAIBAS

(implemented by Funbio). For COPAIBAS, for example, there are no apparent overlaps as the project scope and target communities are to be a bit different.

- Securitization of natural assets: Securitization of natural assets is very interesting, but it should be covered by good risk mitigating measures, and the project could be better at explaining the rationale behind the financing schemes. For people who have little experience with finance terms and schemes it seems complicated.
- Risk: The reporting on risk management is assessed as comprehensive: it is positive that each risk is rated from low to high. However, the risk matrix can be further improved by emphasizing each existing risk in a combination of probability and impact. It would be good to explore the risks as the cooperatives see it, and also what their alternatives are on financing/loans.