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COMPILATION OF COMMENTS SUBMITTED BY COUNCIL MEMBERS ON INTERSESSIONAL WORK PROGRAM APPROVED BY COUNCIL IN FEBRUARY 2012

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the Intersessional Work Program approved by the Council in February, 2012.

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BIOLOGICAL DIVERSITY

1. China: A Landscape Approach to Wildlife Conservation in Northeastern China (World Bank) (GEF Project Grant: $3,000,000)

✓ ***Canada Comments***

While the PIF does outline the connection to past WWF and WCS work, the PIF does not make it clear how it relates to other GEF-supported projects in the area and in other protected areas in China. The project proposes a relatively innovative mainstreaming of biodiversity conservation within development planning processes, including use of the SMART green infrastructure guidelines. Will the project invest in any evidence-based learning around this innovation, helping to determine whether or not it is something that should / could be replicated? The PIF mentions that no indigenous communities will be involved in the project. However, there are important ethnic groups located in this region of China, such as the Oroqen peoples. Why will these and other local ethnic groups not be involved in the project? While the PIF does talk of strengthening the protected areas in Northeastern China, it is not clear how this strengthening will lead to enhanced sustainability, particularly the financial sustainability of these protected areas.

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

2. Ecuador: Advancing Landscape Approaches in Ecuador's National Protected Area System to Improve Conservation of Globally Endangered Wildlife (UNDP) (GEF Project Grant: $4,450,472)

✓ ***Canada Comments***

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Germany Comments***

Germany supports the project proposal regarding the implementation of landscape approaches to support the conservation of endangered species inside and among protected areas. The proposal is well-structured and is consistent with the GEF objectives and in line with the national policy to strengthen the Ecuadorian protected area system and supporting the implementation of the CBD 2011-2020 Strategic Plan. The expected outputs are coherent the project components and with the objectives proposed at project and focal area level. The PIF was developed on the base of a comprehensive analysis on the state of the art and the underlying causes of endangered wildlife, building therefore a good approach to reverse the situation, contributing to the sustainability of protected area systems and to improve the management effectiveness of protected areas. The strategy of the PIF also considers participation and gender aspects in a comprehensive form. In addition, we would like to provide the following suggestions for improvements to be made during the drafting of the final project proposal:

- Coordination with other initiatives that are working in protected areas and at buffer zones landscape level in the country is essential. For instance: Project GEF II, in which some interesting instruments were designed, i.e. systems for monitoring biodiversity (how to use these tools in the new project?), and the GIZ/GESOREN-programme in cooperation with the MAE (e.g. gaps of Continental conservation, subsystems of private and community protected areas, updating of the national strategy on biodiversity, assessment of the effectiveness of management, corridors of connectivity, etc.);
- The GEF-project should support and strengthen processes that are under way, harmonize and formalize instruments and transform or integrate them into normative and legislative frameworks;
- The proposed area of intervention is relatively wide-spread and scattered, it should be considered to concentrate the interventions on certain areas in order to have a better impact;
- It should be considered to incorporate wild flora into the project scope, in order to achieve an increased integrity of actions, since the illegal trade comprises not only species of fauna. Both aspects could be adjusted in the planned measures;

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- It is important to better clarify the role of each stakeholders in the planning process and in the implementation of activities (MAGAP, SENPLADES). At this stage the PIF is not sufficiently clear on this;
- In Component 1, there are some actions mentioned that are already underway in the country, the question is how to ensure their formalization, implementation and sustainability. Regulations per se are not always sustainable in the country, regardless whether it refers to top-down methods or "command and control" regulations. An important question in this context is: What are the mechanisms and incentives that bring other governmental levels as well as communities to accept laws and legal instruments? In addition to that, the allocated budget is relatively high in a component of mainly technical and administrative nature;
- Component 2 should be more pragmatic and comprehensive and put into practice the results of Component 1. More financial resources are required in this component. The role of local stakeholders (municipalities and communities) should also be better clarified and taken into consideration.

3. Guatemala: Conservation and Sustainable Use of Biodiversity in Coastal and Marine Protected Areas (MPAs) (UNDP) (GEF Project Grant : $5,354,545)

✓ ***Canada Comments***

The project document is well presented and logical. It is a good example of a quality PIF. The importance placed on financial sustainability of newly-formed PAs is an important element of the project, as well as engaging local communities and actors in the sustainable use of marine and coastal ecosystems. This PIF provides a great example of highlighting the relation between a GEF biodiversity project and the CBD Aichi targets.

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Denmark Comments***

- The project proposal is well conceived. It identifies clearly what are the threats to the coastal and marine eco-systems in the project area, what are the main drivers and barriers to their protection, and how the project aims to address them.
- The measures to promote long-term economic sustainability and welfare, envisaged as an outcome of the project, may imply trade-offs for local communities' livelihoods in the shorter term. The project should therefore include a strategy of how to mitigate potential negative socio-economic impacts and promote alternatives to unsustainable practices where such are discouraged.
- The considerations regarding financial sustainability of the MPA's are crucial but, as experience shows, this is also an ambitious goal compared to a projects lifetime. Therefore it is suggested to carefully balance the number/areas to be designated as new PA's to the activities that the project realistically will be able to support and prospects to achieve a reasonable level of sustainability.
- The proposed co-financing arrangement with participation of a number of national sector institutions and international donors is welcomed. The mechanisms to ensure effective coordination and harmonization could, however, be more explicitly described
- In view of the identified threats to the marine and coastal eco-systems deriving from important economic sectors, active collaboration based on formal agreements with sector representatives of marine transport, fisheries, energy & mining, etc., and effective enforcement measures are important elements to ensure protection of the MPAs.

- The indicated participatory approach is appreciated and decisive for success in a multi-stakeholder context as the one described. However, the mechanisms and processes for participation are rather cursory described, and mention could have been made of the possible obligations to carry out consultation processes, among others as concerns the right free, prior and informed consent of indigenous peoples and local communities living in the areas of potential new MPAs (*i.a.* as established in the Convention on Biological Diversity and the ILO Convention 169 that has constitutional status in Guatemala).

✓ ***France Comments***

The project will contribute to increase the representativeness of the marine protected areas within the Guatemalan System of Protected Areas (SIGAP).

The project is very well developed but concentrates mainly on the Pacific coast. It is understood that the German KfW is supporting the main MPA of the Caribbean coast, but that doesn't mean that some coordination (particularly on institutional support to CONAP, management effectiveness tools, trainings, etc) should not be coordinated with what will be done on Caribbean coast. Another way to ask the question is to wonder why the Punta de Manabique MPA with KfW assistance is not integrated within this proposal to form a more global assistance to Marine protected areas of Guatemala?

Little information is provided on any issues with indigenous communities in the project areas. This project could support the effort made recently by CONAP and FUNDAECO to increase the involvement of local indigenous communities in Protected Areas co-management schemes. The current PA laws in Guatemala don't allow local communities to participate in PAs co-management schemes. Previous pilot projects were implemented with the help of Netherland and France and demonstrated that co-management schemes were feasible (examples are already in places in the Izabal Province).

Opinion: favourable

4. Honduras: Strengthening the Sub-system of Coastal and Marine Protected Areas (UNDP) (GEF Project Grant: $3,036,364)

✓ ***Canada Comments***

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Denmark Comments***

- The project proposal is well conceived. It identifies clearly what are the threats to the coastal and marine eco-systems in the project area, what are the drivers and what are important barriers to their protection.
- An important aspect that is rather cursory described in the project proposal, particularly in the Logical Framework, is the way that indigenous peoples and other local communities living in the existing and potential future PA's will be included in the process of mapping, identifying and designating PA's and the concepts and plans fo their management. As a minimum it should be ensured that Indigenous Peoples' right to free prior and informed consent and other internationally and nationally recognized rights to consultation (e.g. the ILO Convention 169 ratified by Honduras) are adequately fulfilled in the preparation and implementation phase. Moreover, the context analysis of the project indicates that social conflicts and trade-off's in terms of livelihood options could be potential consequences of the extension and intensified management of PA's, which calls for a highly inclusive and participatory approach from the outset.
- The proposal includes important considerations and actions regarding economic activities for the inhabitants of the PA's and financial sustainability. These are very important but, as experience shows, also ambitious goals compared to a projects lifetime. Therefore it is suggested to carefully balance the number/areas to be designated as new PA's to the activities that the project realistically will be able to support and prospects to achieve a reasonable level of sustainability.
- The inter-institutional approach is laudable, and can as such be part of the solution to the fragmentation of responsibilities and weak coordination that are indicated as one of the barriers to improved protected areas (PA) management.
- While its explicitly described how different institutions are expected to collaborate, for instance SERNA and the Fishing authority (DIGEPESCA), the role of, and mode of collaboration with SAG (the secretariat of agriculture and livestock – not "environment and livestock" as stated in the project documents) should be made more explicit. This is especially important as agricultural development is mentioned as one of the driving forces of eco-system degradation in the Honduran coastal planes, as the Aguán River Basin, in terms of sedimentation problems deriving from up-stream soil erosion as well agricultural pollutants (e.g. from palm oil plantations).

- The proposed co-financing arrangement with participation of a number of national sector institutions and international donors is an important measure of harmonization

✓ ***France Comments***

This project is developed on similar basis as the one for Guatemala and aims at increasing marine protected areas numbers and surface in Honduras.

We support the initiative but the sustainability of the MPA increase in Honduras is not convincing. The project should consider to provide endowment funding to the MAR Fund, the conservation trust fund dedicated to conservation of the MesoAmerican Reef and the MPA network of the region or its Honduras member, the *Fundación Biosfera.* These Conservation trust funds remain one the long term financing solution which should be complementary to financial sustainability solutions promoted by this project.

Opinion: favourable, with the above suggestion.

✓ ***Germany Comments***

Germany asks that Final Project Documents for the following projects will be sent to Council for review four weeks prior to CEO endorsement. The Final Projects should only be endorsed after the following points have been taken into account.

Through this project, Honduras aims to promote the conservation of biodiversity through the expansion of the effective coverage of marine and coastal protected areas and to contribute subsequently to the protection of very unique and important ecosystems in Central America. The proposal illustrates clearly the national situation and political priorities, and presents a thorough problem analysis. Based on this analysis, objectives and outcome of the project are coherent and consistent with the underlying priorities. There are, however, the following concerns which should be addressed before the proposal proceeds further:

The activities described within three of the project components, namely to reach the objective of expanding the coverage of marine and coastal protected areas in Honduras and to guarantee their sustainability in finance and management, do not sufficiently explain how they will deal with the problems and barriers stated which have so far prevented the establishment of effective marine conservation networks, especially when it comes to institutional deficiencies of SINAPH. The full proposal should therefore clearly identify how improved management effectiveness and the strengthening of relevant actors are to be achieved beyond strategic approaches and comprehensive management planning, agreements and monitoring systems;

The Baseline on protected areas presented in the project document and the source given for further information do not match with the figures in the quoted National Protected Areas System of Honduras (SINAPH). SINAPH lists 91 protected areas in Honduras covering almost 4 million ha and not only “approximately 2.3 million ha”. It includes 4 marine national parks (not only 2) and 1 marine nature reserve with a total area of ca. 800.000 ha, not to mention costal protected areas. As the objective of the project is to expand the effective coverage of marine and coastal protected areas in Honduras, these discrepancies should be clarified and presented in a consistent way.

5. India : Developing an Effective Multiple Use Management Framework for Conserving Biodiversity in the Mountain Landscapes of the High Ranges, Western Ghats (UNDP) (GEF Project Grant : $6,275,000)

✓ ***Canada Comments***

- The project's financial contributions from the private sector is a very positive elements, although $1 million does seem slightly low given the focus placed in the project to working with tea, cardamom and tourism sectors on sustainable use of biodiversity. Is it worthwhile to transform a protected area-centric planning process that does not work, into a landscape-based planning process? What guarantees that moving from PA to landscape will enable success? What are the underlying reasons that the PA-centric planning process does not currently work? Will these be addressed? While it is recognized that a landscape planning approach will bring more diverse actors to the table and allow for sustainable use discussions, will this alone enable success?

- While it is understood that the project does not focus only on PAs, it does intend on strengthening the PAs in this region of India. However, there is little discussion in the PIF in regards to the financial sustainability of the PAs. Furthermore, the project proposes a relatively innovative approach to conservation planning. Will the project invest in any evidence-based learning around this innovation, helping to determine whether or not it is something that should / could be replicated?

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Denmark Comments***

- A basic question could be: Is it appropriate to allocate 37 mill USD in order to protect an area of approximately 27.000 hectares (1.370 USD/ha) of protected land? Even though the Kerala State Government seems to be prepared to deliver 28 mill USD as co-financing, it seems difficult to understand that a "pilot" based on that kind of investment/ha could have broadly relevance and as such be generally implemented for widespread impact.

- It is not easy to find coherence between description of activities and the (rather large sums) allocated for these in the budget. (Like why it will cost more than 30 mill. USD to apply "Multiple Use Mountain Landscape Management" (MUML) and "Community Based Sustainable Management of Wild Resources" in a rather discreet area and assumingly with sufficient respect to sustainability challenges?)

- It is not clear from the documentation how the "Land Scape Level Land-Use Plan (LLLUP)" allocating land "to optimal land-use" based on biodiversity considerations is meant to guide future land-use in reality. What kind of local governing structures will actually take/be responsibility/responsible for actual implementation of the LLLUP? How is the LLLUP meant to fit in with existing plans? Which implications will the LLLUP have on existing land ownership and how is the project going to tackle conflict of interest?

- Not easy to see how local partners have been involved and what kind of actual role they will play

- There seems to be an imbalance between expenditure and presumed impacts and the poverty reduction aspect does not have a prominent role at all. (i.e. no indication of the number of people who eventually could benefit from the project)

✓ ***Germany Comments***

Germany approves the project proposal, but would like to provide the following suggestions for improvements to be made during the drafting of the final project proposal:

We recommend that the assessment and valuation of key ecosystem services (incl. provision of clean water) from the High Range Mountain Landscape should be emphasized more strongly under Component 1 as a basis for the formulation of a *Landscape level Land Use Plan*, for improving governance of the multiple use landscape, and identification of instruments incentivizing sustainable ecosystem management (e.g. through payment for ecosystem services).

6. Mexico: Strengthening Management Effectiveness and Resilience of Protected Areas to Protect Biodiversity under Conditions of Climate Change (UNDP) (GEF Project Grant: $10,172,727)

✓ ***Canada Comments***

We agree with the STAP review that the project is innovative and well-prepared, and we note that the project include a very high level of co-financing, mostly from national sources. The Mexican government should be commended for its efforts. The STAP also suggests that the approach taken in this project could help inform GEF tools on climate resilience of its projects. In this context, can the project invest in any evidence-based learning around this innovation, helping to determine how it could be replicated for other GEF projects?

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***USA Comments***

We believe this proposal has technical merit and is consistent with the Government of Mexico's long term plans and objectives. This project proposal stands to contribute significantly to the conservation of Mexico's biodiversity and is based on sound scientific and technical analyses. We believe that it will also help to sustain the capacity of protected areas to deliver environmental services, and will strengthen the country's capacities for biodiversity protection and management. Furthermore, this project will contribute to the implementation of Mexico's National Strategy for Climate Change in Protected Areas.

✓ ***Switzerland Comments***

Overall Comments

We believe that the overall goals of the project are positive and address important biodiversity conservation priorities. However, we agree with the STAP that the project is not ready to be recommended at this time. The project proposal lacked cohesion and requires more focus and detail on the objectives of the project. Further, we found the project too complicated and ambitious for the implementation during just a four-year period with requested resources, and with the large number of actors and partners it is going to involve.

It's also unclear exactly how this GEF proposal will benefit and streamline work with ongoing efforts, such as that of WWF-Russia and the CAFF working group of the Arctic Council. Many of the "expected outputs" need to be institutionalized over the

course of 20 years or more (such as 1.3.2) and are not tasks that can be accomplished and checked off as complete in the timeframe allotted. It is also not clear how the establishment of a park in Chukotka or an international agreement is tied to the outcomes.

Finally, while indigenous communities are mentioned in the proposal, we would like to see a more concrete explanation of ways in which they would be engaged. Should the project significantly involve the region's indigenous peoples, its capacity to positively impact biodiversity would be enhanced and the project could complement other efforts such as the proposed Beringia Shared Heritage Sister Park Arrangement.

Questions, Concerns and Challenges for further Project / Program Refinement

Component 2, chapter 2.6.: Please explain how the proposed "better stewardship" on private lands and ownership in conservation is expected to be achieved?

Component 3, chapter 3.3.: Please explain how communities are to be involved for improved PA management.

Component 3, chapter 26: Please explain indicators to be used to measure and predict CC im-pacts on a micro-site and which training is to be provided to which target group(s) to build capaci-ties for sustainable monitoring.

Has the 43 Mio USD proposed Government co-financing (all grants) been confirmed?

50% of the protected areas under federal jurisdiction are biosphere reserves which do not qualify as protected areas per se, since only core areas enjoy protection status for biodiversity conserva-tion. The figures provided of the total area protected in the country are therefore misleading. Please clarify.

Risk assessment: The proposed use of "adaptive management" to mitigate threats from CC is too unspecific, providing the proponent with a "carte blanche" to change goal posts at will.

Conclusions and Recommendations

The project is too complex and ambitious as presented and therefore not feasible without major changes. The project timeline of 5 years is much too short to gauge project success. Sustainabil-ity issues and the cost effectiveness of the USD 45 Mio project are inadequately addressed.

The project requires major streamlining and downsizing. Focus should be on clearly defined prior-ity geographical areas offering sound opportunities for stakeholder participation, livelihood stabili-zation of rural poor and community empowerment and fair equity sharing in order to achieve broadly-based ownership in sustainable biodiversity conservation inside and outside protected areas.

7. Namibia: Strengthening the Capacity of the Protected Area System to Address New Management Challenges (UNDP) (GEF Project Grant : $4,000,000)

✓ ***Canada Comments***

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***France Comments***

The project aims at the financial sustainability of the Namibia protected area system.

We globally support the proposal, but it seems to mainly concentrate the effort on the national parks system but its contribution to the development and maintenance of communal conservancies (which is a very promising and successful community based natural resources management - CBNRM system) remain unclear.

Transaction costs to establish and foster operation and maintenance of communal conservancies are not clearly reflected on the "Sustainable Financing Plan for Namibia's Protected Area System:"(February 2010). Conservancies are supposed to be self financing areas, but they need enforcement and training assistance over the long term, which don't seem to be integrated in the sustainable financing plan.

Precision on the contribution of this project to conservancies' long term financing would be appreciated in parallel to its contribution to the national parks system.

Opinion: favourable, with the above clarification.

✓ ***Germany Comments***

The proposed project aims to address new challenges in the management of Namibia's protected areas and communal conservancies (prevention of poaching through effective law enforcement; improved fire management) and to increase funding opportunities for these areas. Germany requests that the following requirement is taken into account during the design of the final project proposal:

- Providing sustainable livelihoods to communities is central to the success of conservation. Under Component 1 the project aims to support the development of financing opportunities for new communal conservancies. The strategy for these areas should be elaborated more clearly vis-à-vis the strategy for increased revenue collection across Protected Areas.
- Institutional sustainability: The project builds on substantial policy and institutional reforms supported by previous projects, and reference is made to MET's new

structure that will provide for decentralization to improve on decision-making and management effectiveness in parks and wildlife management. However, a more thorough institutional analysis and capacity assessment (MET, conservancies, other key stakeholders) is required to assess how the proposed sophisticated enforcement schemes can be effectively implemented and sustained.

- Coordination with other related initiatives: Within the efforts of donor coordination the implementing agency should consider ongoing and emerging projects of German Development Cooperation. In 2011 the Government of the Federal Republic of Germany has committed new funds to the Government of the Republic of Namibia for bilateral Financial Cooperation (KfW) on Integrated National Park Management and for Technical Cooperation (GIZ) on Biodiversity Management and Climate Change.
- In view of transboundary issues involved in fire management and law enforcement (e.g. in the targeted Mamili, Mudumu and Babwata NPs in the KAZA transfrontier conservation area) relevant regional programmes should be taken into account, such as the SADC Regional Fire Management Programme and SADC Programme on Transfrontier Conservation Areas.

8. Peru: Conservation and Sustainable Use of High-Andean Ecosystems through Compensation of Environmental Services for Rural Poverty Alleviation and Social Inclusion in Peru (IFAD) (GEF Project Grant : $5,354,545)

✓ ***Canada Comments***

- This is a valuable project, both due to the importance of the biodiversity in the region, but also because of the opportunity to scale-up of PES activities in the region. The project's co-financing levels are very good, but they are based entirely on a $29 M hard load from IFAD. Firstly, it is not clear that the entire $29 M, which is associated with the broader IFAD "Programme for Local Development Support", is in-fact GEB-related co-financing. Secondly, there is no information on how the project plans on repaying this loan. It would be important to better understand how the project proponents have envisioned dealing with the re-payment of this loan, as no information is provided in the project proposal.

- The project appears to be mostly a water project. While improving water resources is important, it is not clear how this is related to generating global environmental benefits. While we understand the relation between protecting the sources of freshwater and conserving biodiversity, how does water resource management directly relate to the GEF's BD-2 objective?

- It appears that the PES schemes will depend on voluntary contributions from private sector, subsidized in the short-term by project funds. How can the proponents ensure a sustainable flow of income into the PES schemes if contributions are voluntary? There is a risk that the payment / compensation rate is not sufficient to interest community members and landowners. How will the project ensure that an appropriate, fair compensation framework is established? And what if the amounts required are higher than expected? How can the financial sustainability of the PES schemes be ensured?

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Germany Comments***

Germany approves the well-prepared project proposal, but would like to provide the following suggestions for improvements to be made during the drafting of the final project: Other international research centers (CIFOR, for instance) have conducted major projects (past, ongoing or incipient) with a focus on Payments for Environmental Services (PES). Their experiences of scaling up payments for watershed services, designing regional compensation systems to safeguard water supplies for downstream agriculture could be of interest in setting up the project. In addition, Peru implements various social programs to alleviate poverty which could be analyzed, for instance, the National Forest Conservation Program for Climate Change Mitigation which combines transfer payments to local communities with regard to conservation and poverty alleviation.

9. Peru: Strengthening Sustainable Management of the Guano Islands, Islets and Capes National Reserves System (World Bank) (GEF Project Grant: $8,922,638)

✓ ***Canada Comments***

It is good to see emphasis placed on sustainable financing and the project mentions developing a sustainable financing plan. How does the $4 million endowment fund fit into the broader sustainable financing plan? Why is it being established before the sustainable financing plan is developed? And why is a separate fund being established here when Peru already has a fund for PA financing? It would be clearer if some of the elements of the sustainable financing plan were flushed out and presented in the final PIF before CEO approval. The project has a good focus on engaging stakeholders and ensuring their involvement in sustainable production component of the project. The STAP provides some excellent feedback, which Canada fully supports, particularly that related to working in a transboundary setting to improve the sustainable use of fisheries resources. We would like to ensure that the STAP's feedback be addressed in the final project proposal.

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Germany Comments***

Germany supports the project proposal and its objectives. The areas under the Reserve System are of particular importance due to their unique ecology and their economic potentials. They are however facing growing threats from overuse and climate change. Activities to improve management practices are therefore urgently needed. To enhance the effectiveness of the project outline we would like to provide the following suggestions for improvements to be made during the drafting of the final project proposal:

- Currently Peru does not have a comprehensive zoning approach for its marine and coastal areas. In the context of developing baseline data and establishing priority sites, the project should consider a dedicated mapping exercise to support the identification of priority zones, and / or coordinate with other stakeholders / projects that are working on similar approaches and might be able to provide data;
- Component 4 refers to the establishment of an efficient, experienced and well-trained coordination team for the project. Since the coordination among stakeholders and especially governmental institutions is of great importance for project success, a clear coordination structure should also be defined, identifying roles and responsibilities and the main lines for communication and decision-making;

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- Component 1 includes the design and implementation of a communication strategy: in order to increase the political and public support for the conservation of marine and coastal areas, a wider public awareness campaign should be incorporated into the project design. This could be complemented with increased scientific research into these areas to inform politics and the public;
- A main objective of the project is the building of capacities of relevant stakeholders: in order to enhance the implementation and follow up of established management plans, rules and regulations, the project should try to follow an integrated capacity development approach for tourism, sustainable fisheries and management, including the definition of joint management / monitoring options;
- Component 2 will develop a stakeholder analysis: in order to have a clear administrative and governance structure, the project could analyse the potential / feasibility for establishing a multi-stakeholder platform including all relevant stakeholders such as particularly also the Peruvian navy, PROABONOS, PRODUCE, etc. which play a significant role in the management of the Reserve Areas.

CLIMATE CHANGE

10. Armenia: Green Urban Lighting (UNDP) (GEF Project Grant: $1,600,000)

✓ ***Germany Comments***

The project plans on conducting educational campaigns, exhibits and displays of advanced green lighting technologies. Please explain in more detail the target groups and scale of these measures.

Furthermore, the piloting of energy efficient projects in component 4 is focused on the demonstration of applicability of energy efficient urban lighting in Armenian cities. Please explain in more detail, how these practices are made public and how the program will contribute to the widespread application after the piloting.

11. Belarus: Removing Barriers to Wind Power Development in Belarus (UNDP) (GEF Project Grant: $3,045,000)

No comments

12. Colombia: Low-carbon and Efficient National Freight Logistics Initiative (IADB) (GEF Project Grant: $3,000,000)

✓ ***Canada Comments***

We note that this is the first time low carbon freight transport is being addressed by the GEF. The project will focus on freight transportation companies with fleets, however they only represent about 5% of all trucks. The PIF does not address how it will incentivise the cost of retrofitting ($25,000 per truck) to single truck owners. They represent about 70% of all truck owners.

✓ ***Germany Comments***

Germany approves the low-carbon and efficient national freight logistics initiative but would like to request that the following questions be clarified during the preparation of the final project document:

- Why is the USD$15 million loan from the IADB not included as part of the co-financing?
- How will the Vehicle Renovation Fund be financed? If the answer lies in the design phase, what assurances exist that financing will be available?
- What happens to the trucks that are phase out through the vehicle renovation fund? Will the project over-see the scrapping/recycling of the trucks, as well?
- How are the stated risks weighted (low, medium high)? Is the fact that such a high percentage of trucks is owned by individuals rather than trucking companies also a risk in terms of reaching the targeted trucks?

13. Dominican Republic: Stimulating Industrial Competitiveness Through Biomass-based, Grid-connected Electricity Generation (UNIDO) (GEF Project Grant: $1,300,000)

✓ ***Canada Comments***

The PIF does not make an environmental, financial, or technical case for why biomass is best suited for this project over other sources of renewable energy. The project states that there is no existing demand from industries in the targeted industrial free zones to implement biomass generation plants. There is a need to develop a financially sustainable exit strategy once the project closes.

✓ ***USA Comments***

I particularly would like to call your attention to our comments on two proposals:

- We would like to review the full proposal of this project.

We have two concerns about this project and would like to review the full proposal to ensure that it addresses these questions and concerns.

First, we share the STAP question on what type of biomass will be used and if there is sufficient volume of biomass for the project to be sustainable. The proposal does mention in a footnote that agricultural waste such as rice husk residue will be used but doesn't provide details for the cost of the materials and transport, nor the actual volume available.

Second, the Secretariat Review document asks how the government will manage the GEF funding, and if 2.5 MW is enough to cover the total energy needs of the Free Trade Zone. Additionally, part of the economic rationale for this project is based on current average electricity costs of $0.18 per kWh, versus a cost of $0.10 for biomass-based power. Industrial users often receive a much discounted rate from the "normal" rate. Another question is how does the biogas project compare to natural gas? In this light, we have some concerns about the financial viability of the project. In particular, we would like to know whether the fairly modest savings resulting from switching from natural gas to biomass will warrant the overall cost and long-term viability of the project.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

✓ ***France Comments***

The project aims at promoting biomass based electricity production for industrial zones in Dominican Republic.

We support this initiative but suggests addressing the following concerns when developing the project brief:

- What is the rationale for selecting biomass power over other renewable energy options? Are there any existing biomass systems in DR which show the financial and technical feasibility of the biomass power systems? Will it be the first such system?

- The PIF proposes to remove legal and policy barriers. How significant are these barriers? Generic barriers are listed and a systematic DR and biomass power system specific barrier analysis is necessary during project preparation.

- As STAP said, the focus of the project seems to be establishment of a 2.5 MW biomass power utility. There are only generic statements on promoting large-scale spread of the technologies. But there is need for serious consideration of activities to promote the spread of the technology. For example - technology standardization (optimized capacities), national biomass resource map, optimized siting of biomass power plants, cost-benefit analysis, and consideration at what cost biomass and electricity will biomass power will be economical.

Opinion: favourable

14. Guyana: Sustainable Energy Program (IADB) (GEF Project Grant : $5,000,000)

✓ ***Germany Comments***

Germany requests that **Final Project Documents are being sent to Council for review four weeks prior to CEO endorsement**

Germany asks that Final Project Documents for the following projects will be sent to Council for review four weeks prior to CEO endorsement. The Final Projects should only be endorsed after the following points have been taken into account.

While Germany welcomes the intention to improve RE-access in Guyana, the connection between the stated problem and proposed solutions is not clear in the PIF. The primary problem, as we see it, is that Guyana is dependent on thermal-based energy generation (i.e. from fossil fuels) which is both cost-ineffective and damaging to the environment. While we understand that a feasibility study for a 150 MW Hydropower project is intended to explore alternative energy to address the problem, we do not understand how the greater focus of the PIF on rural electrification for 134 Ameridian Communities helps to fix the problem. The argument for CO2 emissions reductions in rural areas is not convincing (see below). We would tend to see GEF's role as supporting the feasibility study and conducting the revision of framework conditions for promoting renewable (currently GEF is contributing $100,000 to these activities) rather than the rural electrification activities. The reasons are as follows:

The PIF stated objectives under sec. B.3.: i) electrify Ameridian communities; ii) reduce electricity costs; iii) improve quality of life of villagers, do not support *significantly* the GEF Strategic Objective 3 when we consider cost-benefit.

The numbers provided indicate that only 74,100 (10% of total population) people occupy Guyana's hinterland and of those, about 60,000 (80%) do not have access to energy. The proposal aims to increase renewable energy access to people in the hinterland by 9%, which would give about 5300 people energy access at a cost of USD 20.4 million (when we consider GEF + Co-financing in Component I). When we calculate the cost per ton over 20 years, this works out to USD 62/ton, which is quite high considering the relatively low impact. Furthermore, there is no consideration of how rural electrification, particularly on-grid installed energy, in Guyana's hinterland – one of the world's most pristine and untouched primary forests – might impact development in the future. The potential for economic development in the hinterland is mentioned in the PIF, but no clarification is provided about what might be intended.

If rural electrification is a goal of the IDB, then we suggest allowing IDB to finance these initiatives while GEF focus efforts on the stated problem of improving renewable energy access to the area where 90% of the population lives. This could include doing the feasibility studies and gap analyses for renewable energy and efficiency measures along the coast and looking at the potential for hydropower.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

With regard to the feasibility study for the 150MW Hydropower plant: **please provide more information about the facility under consideration**. Germany is aware of one feasibility study for the Amalia Fall Hydropower Dam, which was rejected by the World Bank for financing due to the anticipated negative social and environmental impacts.

The net GHG reductions for Guyana would need to be assessed as part of the hydropower feasibility study, as the flooding associated with dam construction results in GHG emissions. We estimate that in the case of Amalia Fall, the project would need to offset more than 90,000 Tons of CO2eq/ year to make up for the emissions from the dam construction

15. India: Preparation of Third National Communication (3NC) to the UNFCCC and Strengthening Institutional and Analytical Capacities on Climate Change (UNDP) (GEF Project Grant: $9,010,604)

✓ ***Canada Comments***

NOTE: Canada has several comments on this proposal forthcoming next week.

As noted in our email of February 24 in which we indicated that Canada would send additional comments on India's Third National Communication project, we would like to share the following with you:

- We welcome this proposal by India to prepare its Third National Communication to the UNFCCC and appreciate the complexity and scale of effort required to undertake this exercise.
- To aid in understanding ongoing cost pressures for donor countries more information on how the cost of the project was determined would be appreciated. We note in particular that past NatCom and other climate change projects in India have made investments in data-gathering methodologies, human capacity and systems. Does this factor into your cost projections?
- We are supportive of India's decision to include the preparation of their first Biennial Update Report (BUR) to the UNFCCC within the scope of this project. However, it is not clear what methodology was used to determine the appropriate level funding. Can you explain your costing for the BUR?
- There seems to be overlap between project component 7 (Other new information required under the aegis of the Convention) and other project components. Expected outputs 1 (Information on national circumstances), 2 (National inventory), and 3 (Information on mitigation) are the most resource intensive segments of the component, but are also covered under other project components dedicated to each (Project components 1, 2, and 4). Would it be possible to explain the distinction between these components further?
- The proposal states under project component 5 that it will fund "Comprehensive description of systematic observations and research on climate change". Does this fall under the mandate of the SCCF as opposed to the GEF TF?

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

✓ ***Germany Comments***

Germany requests that **Final Project Documents are being sent to Council for review four weeks prior to CEO endorsement**

Germany asks that Final Project Documents for the following projects will be sent to Council for review four weeks prior to CEO endorsement. The Final Projects should only be endorsed after the following points have been taken into account.

Germany welcomes India's ambitious proposal for robust national reporting, including several new milestones, such as using 2006 IPCC Guidelines, Tier 3 inventory methodologies and the development of a national emissions factor database.

Given the high costs of the proposed activities, Germany requests to receive the draft final project proposal, which should include details regarding the calculation of costs and clear distinctions between costs for the biennial update report to be submitted in 2014 and the national communication to be submitted in 2016, four weeks prior to CEO endorsement.

In addition, German requests the following points be taken into consideration:

- Please include information on domestic MRV in Component 7, as this is part of the Durban outcome and is omitted in the summary table.
- CEO endorsement of the TNC must be contingent on the submission of India's second national communication to the UNFCCC.

16. India: Promoting Business Models for Increasing Penetration and Scaling up of Solar Energy (UNIDO) (GEF Project Grant: $4,365,174)

✓ ***Canada Comments***

The PIF does not clearly state which objective under the climate change focal area it will support. It is not clear what business models will be promoted by the project or which industries will be targeted. A Global project (which included India) that came to a close in 2010 developed a strategic market intervention approach for solar technologies. It would be beneficial for the PIF to take into account lessons learned from the terminal evaluation.

✓ ***Switzerland Comments***

Overall Comments

The project addresses both climate change mitigation and adaptation and contributes to assisting India in addressing its important energy challenge. The project seems well anchored in the econ-omy given that it revolves around important Indian industrial manufacturers and innovative tech-nologies. It has a large range of institutional partners and supporting donor agencies, which should allow it to influence the sector in a sensible way and have a large impact in terms of cost and energy savings. The multi-stakeholder approach of the project should also allow the project to have a strong replication effect. Solar appliances for medium and high temperature use appear to be relevant for a country like India, where the resource is accessible and local technologies have already been developed. Moreover, the initiative is in line with National and Regional poli-cies and programmes for the development of renewable energies, in particular for solar energy appliances. The project also addresses socio-economic aspects since it supports local economies and tends to provide local employment.

Questions, Concerns and Challenges for further Project / Programme Refinement

- In many cases, energy efficiency measures could reduce cooling needs and the size of the plants. It does not appear in the document. Synergies with energy efficiency programs should be sought to combine the approaches.

- Very often the least cost is considered for bids. During the pilot phase, and later, other pa-rameters should also be considered. The lowest bid may not be the best approach. A per-formance-based bid comparison should be developed. This would allow a better technology choice based on actual energy costs and not investment price alone.

- Industry associations should be identified and associated with the process of selecting the pilot plants. The impact for replication would be then enhanced.

- The question of dissemination of information regarding the operation and maintenance of the solar appliances supported by the project (best practices, drawbacks,

actual costs…) will need to be addressed seriously so as to make sure that knowledge is effectively disseminated. This will be particularly important for the Replication/Scaling up phase.

- The fact that there are many stakeholders is both a strength and a risk for the project, as this may lead to lengthy decision-making processes, lack of flexibility and potential freezes if the stakeholders should disagree on the projects to support and/or the manufacturers to involve or not. However, it does seem that the project focus was well identified so as to be comple-mentary to existing supporting schemes. In addition, the project brings added value through providing investment capital to grant beneficiaries. A way forward may be to spend extra time on project preparation to agree on criteria for selection of applications to be supported by the project and/or appointing a technical committee that would be in charge of selecting the projects.

- The social impact of the project could be strengthened further by including a share of small scale industries. This would need to be done in coordination with the existing UNIDO-GEF "Promoting energy efficiency and Renewable Energy in selected Micro, Small and Medium Enterprises (MSME)" Project. Alternatively, one might want to include them in the project by encouraging the larger-scale industries to join the project with a smaller-scale industrial "part-ner" to whom they would provide technical support. In addition, the project could increase its socio-economic impact by supporting local consulting entrepreneurs engaged in designing so-

lar energy installations, through targeted training and capacity building programmes. Finally, it might be demonstrated by the project that the development of solar installations and tech-nologies, by reducing the cost of energy production, will ultimately benefit India's poor and vulnerable population which has no access to energy today.

Conclusions and Recommendations

This project certainly ought to be supported because it addresses key challenges for India: its sustainable energy production in coming years. In addition, the energy and cost savings will be sufficiently important to have a tangible impact on both India's industrial and energy sectors. The project's strength is that it is anchored in the local economy and makes use of a variety of com-plementary incentives and supporting mechanisms: targeted technical support and knowledge dissemination, provision of investment capital, grant mechanism. In addition, the project content is in line with India's national policy objectives and will be implemented in coordination with MNRE and IREDA. Further project preparation may need to address the issues of dissemination of in-formation, smooth stakeholder coordination and increased social impact of the project. However, it is recommended to consider the remarks stated above in the final project development.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

✓ ***France Comments***

The project aims at promoting business models for increasing the penetration and scaling up of solar energy in India.

We strongly welcome this project, and suggest consideration of the following issues in the next phase of project design to enable achievement of the goals of the project:

- The project aims at demonstration of technical and financial viability. Will just installation of systems alone ensure financial viability? What specific measures will be undertaken to ensure this? Currently the industry may be depending on subsidized diesel or electricity under the baseline scenario. Are the technologies selected currently financially viable? Are there any examples already in the field?

- This project proposes ambitious plan to promote solar energy sources in industrial applications in India. The PIF states 16 sectors will be considered. There is a need for prioritizing the sectors and technologies for intervention based on a number of specific criteria, such as technical feasibility, GHG mitigation potential, cost-effectiveness, and replication potential.

- The PIF does not specify if the project focuses on the promotion of solar energy in large industries or SME or both. Barriers in these sectors and implementation approaches/business models will be different.

- The biggest risk of potential high investment cost for solar technologies and how this risk will be addressed needs to considered during project preparation.

Opinion: favourable

✓ ***Germany Comments***

Coordination with the activities of other donors should be sought more actively. This could help to avoid unnecessary overlaps and create room for synergies. The recently established donor platform of the Ministry of New and Renewable Energy (MNRE) offers a good basis for an improved exchange of the implementing agency with other donors.

Lessons learned from the project "Commercialisation of Solar Energy in Urban and Industrial Areas (ComSolar, 2009-2013)" implemented by GIZ with MNRE should be taken into account during further project design. Activities of this Indo-German project are very similar to the proposed GEF project.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

✓ ***Japan Comments***

1. JICA signed a loan agreement with the Government of India amounting to 30 bil JPY (approx.400 mil USD) in June 2011 to finance new and renewable energy development, including solar energy, through IREDA.

http://www.jica.go.jp/english/news/press/2011/110616.html#a04

2. PIF of the proposed GEF project names IREDA as co-financier, but only mentions about ADB credit line.

http://www.gefonline.org/ProjectDocs/Climate%20Change/India%20-%20(4788)%20-%20Promoting%20Business%20Models%20for%20Increasing%20Penetrati/PIF%20India%20Solar%20v6.0_for%20re-submission%20to%20GEF%205Jan12%20FINAL.pdf

3. The proposed GEF project can be combined with financial assistance from JICA through IREDA for better implementation of solar energy policy in India.

17. Lebanon: Small Decentralized Renewable Energy Power Generation (UNDP) (GEF Project Grant: $1,450,000)

✓ ***France Comments***

The project aims to combine technical assistance for creating an enabling policy environment and sustainable renewable energy services with support for developing and expanding the use of the financing mechanisms for the promotion of small, decentralized RE applications

The project is focused on small decentralized RE for power generation systems. Normally one associates small scale decentralized power system for decentralized and off grid applications. However, the PIF talks about only on-grid connection. The PIF also states that in Lebanon in many areas there is frequent black outs and no electricity supply from the grid. Thus, it may make sense to consider largely decentralized applications of power generated from decentralized systems.

Potential risks from possible high costs of SPV electricity needs to be addressed.

Opinion: favourable

18. Pakistan: Sustainable Energy Initiative for Industries (UNIDO) (GEF Project Grant: $3,550,000)

✓ ***Germany Comments***

The scope of the proposed project is relevant to the needs of the industrial sector in Pakistan. It is completely in line with the activities being carried out by the German Development Cooperation, through the GIZ Renewable Energy and Energy Efficiency (REEE) Project. Furthermore, GIZ REEE has been actively working with the three public institutions selected as implementation partners for this project. However, the following issues need to be addressed:

1. The Federal Ministry of Environment (signatory of the PIF) has been dissolved as the provinces are dealing with Environment now.
2. ENERCON, originally part of the environment ministry and no part of ministry of water and power, is presently a very weak institution with severe lack of technical and managerial staff. Furthermore, a recently submitted bill by ENERCON for the enforcement of an 'Energy Conservation Act' was rejected by Parliament
3. Since the contribution of the three public sector implementing agencies to the project is 'in kind', it is very unclear how the accreditation center would be established and run
4. Soft loans amounting to 9.5 million USD from local banks may not be available for the industry
5. The number of persons trained in EnMS over the period of four year by the Accreditation center appears to be very small in relation to the amount of investments the project aims to generate

As provincial government are now active in developing energy legislation and carrying out RE and EE initiatives at the provincial scale, it may be a good idea to include them in the project activities.

19. Serbia: Reducing Barriers to Accelerate the Development of Biomass Markets in Serbia (UNDP) (GEF Project Grant: $2,845,000)

✓ ***Germany Comments***

The project in its current form is very broad in scope. Successful implementation of all project components seems quite challenging in light of the limited budget allocated to individual components. Furthermore, the description of the activities under each component is very general and lacks detail, e.g. on specific institutions and stakeholders to be involved in project implementation. We would suggest a stronger focus on clearly defined fields of activity, that can be implemented within the proposed budget – rather than attempting the removal of too many barriers at the same time.

Furthermore, we recommend close coordination with activities of German development cooperation in further developing the proposed GEF project. As part of the German Climate Technology Initiative, a program for the biomass market development in Serbia is currently under preparation on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ) and will be implemented 2013-2017 through KfW and GIZ. The implementing agency should actively seek contact and exchange in order to ensure synergies and complementarities and avoid inefficient overlap of activities.

Apart from mentioning large cuts in GHG emissions, the PIF contains no information on the potential quantity of GHG reductions associated with the project. This makes it impossible to assess whether the project will promote global environmental benefits in a cost-effective manner.

20. Ukraine: Introduction of Energy Management System Standard in Ukrainian Industry (UNIDO) (GEF Project Grant: $5,550,000)

✓ ***USA Comments***

We would recommend that the project look to USAID's Municipal Heating Reform Project (MHRP) that has been working in municipal heating sector since about 2009 and has partnered with 38 cities throughout Ukraine: (http://mhrp.org.ua/index.php?option=com_content&task=view&id=2&Itemid=5).

INTERNATIONAL WATERS

21. Global: A Transboundary Waters Assessment Programme: Aquifers, Lake/Reservoir Basins, River Basins, Large Marine Ecosystems, and Open Ocean to Catalyze Sound Environmental Management (UNEP) (GEF Project Grant: $5,000,000)

✓ ***Switzerland Comments***

Overall Comments

The objective of the proposed project is to undertake a global assessment of transboundary water bodies, through a formalised consortium of partners, to support informed investments by the GEF and other international organizations, and to be sustained through a periodic process in partnership with key institutions aiming at incorporating transboundary considerations into regular assessment programmes. The project design encompasses a global baseline assessment on five different types of transboundary water bodies, namely aquifers, lake basins, river basins, large marine ecosystems and open oceans. An additional project component targets data and information management, networking and monitoring.

We acknowledge that the GEF Medium Sized Project (MSP) for a Transboundary Water Assessment Programme (TWAP) of 2009 and 2010 upon which this proposed project expands, has de-veloped and validated system and indicator-based assessment methodologies, and has established a consortium of partners ready to collaborate and share information toward such a global assessment.

We also understand that without a global comparative baseline system assessment to determine priority transboundary concerns and priorities for investments, and to track the status of these water systems over time in order to determine whether they are exhibiting improvement or continuing degradation, the GEF and the international community risk spending their scarce financial re-sources in a manner that is not cost–effective.

The PIF indicates a co-financing ratio with GEF funds of 1:4.8 which is in line with recommended ratios for GEF IW projects. The co-financing will come from the implementing agency UNEP and various project partners as in-kind contributions and grants.

We agree with the STAP in welcoming this innovative and ambitious project. We also agree with the STAP's advisory response that the project should consider reducing the coverage of resource systems, particularly removing the large marine ecosystems and the open oceans as the re-sources allocated to these are minimal and will probably not enable adequate work.

We also feel that the ownership of the global baseline assessment and by this, the concept for transferring it into an on-going periodic assessment, is not sufficiently clear. We see that GEF it-self could take this ownership role by taking the assessment results as strategic guidance for their future investment decisions.

Questions, Concerns and Challenges for further Project / Programme Refinement
Carrying out the global assessment is a different task from developing the assessment method-ologies. The robustness and comparability of the assessment results will depend on how far the necessary data collection is standardized, objective and time consistent. Some indicators, such as on detailed governance arrangements, while being of great scientific interest and indispensa-ble for a detailed project design, might not be easily amenable for a robust, periodic and compa-rable global data collection.

We suggest seeking for reduction potential in the foreseen indicator set with a view to facilitate a prompt and continual data collection. We also propose to re-evaluate whether the foreseen Com-ponent 6 on data and information management is sufficiently funded and which institutional re-sponsibilities are best suited to assure a timely completion of this task.

To foster periodic updating and public perception, linkage to other global water assessments should be sought, particularly with the World Water Development Report.

Conclusions and Recommendations
We recognise the importance of the targeted ecosystems, their transboundary character, the relevance of the project objectives and their consistency with GEF strategies and strategic pro-grams.

We recommend continuing with project preparation while taking into account the issues raised above.

✓ ***France Comments***

The project aims at undertaking a global assessment of transboundary water bodies. It concerns aquifers, lake basins, river basins, large marine ecosystems and open ocean.

We globally support the proposal, but we think that he project should consider those tow points:

- The project covers a too broad spectrum (subjects, geographic areas) with regards to the limited time available, in particular as it is based on a very great number of partnerships ;
- Who is the project for? One issue is also the local ownership, which means that data produced by the national contributors for the project must be consistent with data used at national level.

Opinion: favourable

22. Global: Development of a Methodology With Tools and Decision Support Systems to Incorporate Floods and Droughts into IWRM in Transboundary Basins (UNEP) (GEF Project Grant: $4,090,275)

✓ ***France Comments***

The goal of the project is to develop a methodology with tools and decision support systems to incorporate floods and droughts into IWRM in transboundary basins. The project is intended to address the needs for systems that support decision making processes of water management in river basins.

We support the proposal, as it is innovative and address the need to integrate extreme climate events (floods and drought) into basin level planning processes and tools like hydrogeological decision support systems and water safety plans.

However, the project should consider to better taken into consideration local needs and resources (existing tools for example, human resources in transboundary basin authorities to maintain and use those tools) to become operational.

Opinion: favourable

✓ ***Germany Comments***

Germany requests that **Final Project Documents are being sent to Council for review four weeks prior to CEO endorsement:**

Germany asks that Final Project Documents for the following projects will be sent to Council for review four weeks prior to CEO endorsement. The Final Projects should only be endorsed after the following points have been taken into account.

Germany is not able to assess the PIF due to the general and unspecific information provided.

In the PIF is indicated that in up to five pilot basins the Decision Support Tool will be applied. These five pilot basins will be selected out of 30 ongoing lake and river basin GEF projects. We would like to see in the PIF in which river basins the DSS will be applied, who will be the national key institutions as well as the GEF recipient countries. In addition, we encourage UNEP to indicate in the PIF how cooperation with existing bilateral and multilateral initiatives in these river basins will be organized.

LAND DEGRADATION

23. Angola: Land Rehabilitation and Rangelands Management in Small Holders Agropastoral Production Systems in Southwestern Angola (FAO) (GEF Project Grant: $3,013,636)

✓ ***Germany Comments***

The full project proposal should make reference to existing land use and development planning approaches at regional and communal level. The envisaged land-use planning exercises by the project should be integrated in and based on these existing processes in order to facilitate the up scaling of the approach in other regions of Angola. In this sense the concept of the proposed integrated land management plans needs to be explained more in detail.

The identification of communal pastoral areas and transhumance corridors has to be done at a higher geographical level, such as province or region in order to assure coherency between the different municipalities and to avoid future conflicts. In this sense, the project proposal needs more explanations also referring to the FAO land delineation approach.

24. Botswana: Mainstreaming SLM in Rangeland Areas of Ngamiland District Productive Landscapes for Improved livelihoods (UNDP) (GEF Project Grant: $3,081,800)

No comments

25. Pakistan: Sustainable Land Management Programme to Combat Desertification in Pakistan (UNDP) (GEF Project Grant: $3,791,000)

✓ ***Germany Comments***

Germany would like to compliment UNDP on the very impressive amount of baseline data compiled, but has serious doubts on the feasibility of the approach in the enormous scale of 800.000 ha, especially in the current political insecurity Pakistan is facing.

1. We consider a significant, measurable decrease in extent of degraded areas on a landsacle level (Project component 1) to be unrealistic within a project timeframe of 5 years. We kindly request to differentiate between the area covered by new land use plans, and the total area were the improved SLM practices will actually be applied.

2. While the PIF recognizes the importance of participatory approaches, we have reservations regarding the level of participation that can realistically be achieved given the large scale targeted for a time period of five years. We recommend putting more emphasis on the participation of local communities and farmers, and less emphasis on scale.

3. The PIF mentions that "The project will develop and implement a gender inclusion strategy" We recommend that the inclusion of gender aspects should not be "postponed" to a separate strategy, but should be an integral part of the PIF and the overall approach from the beginning, and should therefore receive more emphasis in the PIF

4. The PIF mentions that "legal basis for land use planning will be established making land management decisionmaking more informed". We consider the legal basis as a pre-condition for introducing SLM on a large scale, and therefore we request a clarification whether the expected outcomes can be achieved without a reform of the current legal basis.

5. Germany development cooperation is preparing a project on protection and sustainable management of Biodiversity in Khyber-Pakhtunkwa, to be implemented by German International Coopperation, GIZ. This project has strong linkages to SFM and the UNDP PIF and is scheduled to start end of 2012. We recommend to contact the GIZ country office to discuss possible synergies, especially on land use planning, on supporting provincial structures in Khyber-Pakthunkwa, and on supporting the implementation of the National Action Plan for Biodiversity.

26. Uzbekistan: Reducing Pressures on Natural Resources from Competing Land Use in Non-irrigated Arid Mountain, Semi-desert and Desert Landscapes (UNDP) (GEF Project Grant: $2,313,600)

✓ ***USA Comments***

We commend this timely proposal as improved food security and reduced environmental degradation in Uzbekistan as a whole require that the urgent problems facing non-irrigated lands in this country be addressed in the near future.

✓ ***Switzerland Comments***

Overall Comments

This review is focused on three main issues:

• A Institutional set-up

• B Innovative approach - *ILUP* Integrated land-use planning - includes socio-economic benefits for the population.

• C Test of approach within district based case studies

Ad A: Institutional set-up

Institutional development of the "territorial planning system" (current terminology used in Uzbekistan) and the transition to Integrated Land Use Planning (ILUP) is ambitious but very well chosen und absolutely right as the overall goal of the project. (See output 2.2.1 and 2.3.2).

Graph 1 in the proposal shows the sectoral planning links to land use in general. The overarching competence splitting is evident but does not evidence the powerful status of the State Committee for Land Resources and Geo-Cadastre (=sector 4) for all aspects of land use. The State Commit-tee – in western systems this would be the ministry and the planning authority for agriculture, which in Uzbekistan is directly subordinated to the Ministry of Economy - is responsible for the overall planning in the irrigated agriculture system and the cotton industry. These are the most powerful land use sectors within the central planning system of Uzbekistan.

It will be a major challenge during the implementation of the project to support this State Commit-tee with the transition to innovative concepts of ILUP. Recently, the Committee's staff, specifically in the district branch offices, seems not to be particularly receptive for a transition from old fa-shioned centralized planning to integrated landscape management in arid mountain, semi-desert and desert areas of Uzbekistan. ILUP in such marginal areas surely concerns not only forestry and rangeland management (as defined several times in the objective system) but also such sec-tors as socio-economic benefits for community-based market oriented garden

agriculture, i.e. benefits for the local population. Another important sector per absolute surface concerned (about 10 large protected areas LPA as zapovedniki, zakasniki, national parks are within arid mountain, semi-desert areas) is nature conservation as a key priority identified by the National Biodiversity Strategy and Action Plan (BSAP, 1998, update 2008) cited within the revised PIF**.**

BSAP for Uzbekistan emphasizes the protection of all biological resources including forests and pastures, as the restoration of structures and functions of degraded ecosystems in arid mountain, semi-desert and desert areas as well. Several Uzbek LPA having worldwide importance in the IUCN system are located in these focus areas of this GEF project.

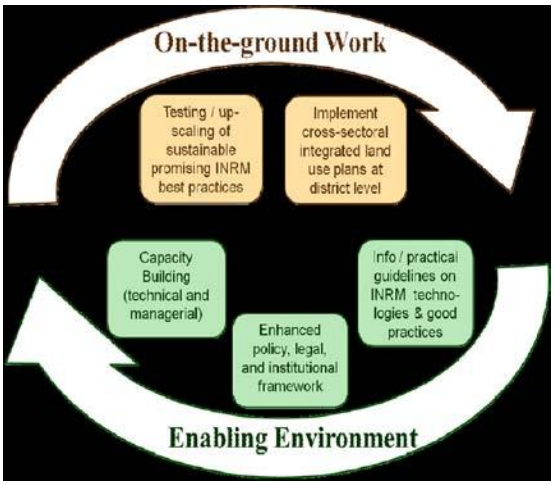
From this example it is evident that the 17(!) sectors relevant for land-use planning are too com-plex to be integrated in ILUP. It seems very unlikely to show benefits from the very innovative ILUP approach for Uzbekistan within a national central planning system. The benefits and the value added of ILUP must be shown as the main goal within this GEF project; on lower planning level that means on district and community levels rather than probably up-scaled to oblast level. And the ILUP approach must be step-by-step oriented as well on locally based benefits.

Ad B: Innovative approach - *ILUP* Integrated land-use planning and socio-economic bene-fits for the population

70 % of Uzbekistan's overall surface area is arid and semi-arid. The largest desert in Central Asia, the Kyzylkum, covers the greater part of the lowlands and plains to the west and south of the country. Despite donor-supported efforts, the process of degradation within the majority of these landscapes (including Tien Shan mountains) is continuing, and in many cases is likely to accelerate. This is especially the case in the pasture-use context, as households are not recog-nized as land users and thus have no official pasture-use rights, despite the fact that in many areas (including the project target districts) household livestock out-numbers those of state farms.

Within the 5-years project duration GEF will invest in on-the-ground activities at selected districts to change the baseline course of actions, and support the institutional, policy and methodological mechanisms needed to sustain the ILUP approach after the project end.

The graph below was elaborated after the first review and – very positively – integrated in this current version of PIF. It shows the testing on-the-ground approach of ILUP in target districts, to be broadened as one of the main recommendations of this review.



Further it is recommended to apply ILUP in the transition zone of irrigated agriculture, pastoralism zone and biodiversity conservation in the dry steppe, (semi)-desert and mountain landscapes e.g. in the in Bukhara Oblast.

The needs of local population as small scale farmers and pastoralists must be addressed through local participation. Participation has to be integrated in this innovative ILUP approach starting on the community level in the target districts.

AD C: Test of approach within district-based case studies

One of the main objectives of this GEF project is to demonstrate best practices on natural re-source management based on an ILUP approach adopted to specific UZBEK planning conditions. Application and up-scaling of promising "show cases" at district or even oblast levels could serve as experience for further implementation of ILUP on the national level.

Steering and follow-up of step-by-step implementation of this "bottom-up" approach (one focus on community and oblast levels) must be strongly assured – this being particularly important if speaking about the top-down land-use planning system in Uzbekistan conducted by the State Committee for Land Resources and Geo-Cadastre for the last 50 years. It is recommended that steering of this specific activity in target districts must be regularly and locally assessed by impact monitoring and locally defined indicators of land-use (see PIF under Integrated land-use plans related to output 1.2.1 and 1.2.2)

An open-end identification of more than 2 test districts (up to 5 would be ideal) along with a catalogue of criteria (to be defined) is useful as well.

Questions, Concerns and Challenges for further Project / Programme Refinement

Ad A In order to test, adapt and upscale the ILUP approach, it is strongly recommended to estab-lish and monitor a specific, rather strict project steering for these target districts (+ community / + oblast) and for the integration of a broader institutional set-up with "bottom-up" components. Ex-ternal support for the steering of the target district ILUP approach should be integrated during the overall project duration.

Ad A Involving other state planning institutions and non-governmental organisations seems rec-ommendable: Environmental "governmental" NGO, Committee on nature conservation and its de-partment on Environmental Impact Assessment (EIA) and Uzbek based consultants dealing with sectoral or territorial planning.

Ad B Competence splitting within land-use planning in Uzbekistan is evident. This will likely hinder innovative approaches as ILUP.

Ad B Component 1 intends to involve district stakeholders responsible for land use i.e. forestry enterprises, shirkats, private farmers, local self-governing structures, and, most important of all, local communities and individual households. Question: How to ensure this during project imple-mentation. Top-down mentality of land-use planning in Uzbekistan is dominant.

Ad C Question: How have target districts been identified and with which overall objectives will the ILUP case studies be elaborated?
We would recommend to define criteria for selection of these pilot districts. Criteria could be: rep-resentative, typical or even "hot spot" districts for infrastructure impact or soil degradation.

Conclusions and Recommendations

Ad B Recommendation to test the ILUP approach on "hot spots" of environmental protection such as infrastructure planning, highways in mountains, oil and gas facilities, and irrigation reconstruc-tion in semi-desert ecosystems. Other environmental hot spots specifically should be identified along the boundaries of irrigated and semi-deserts landscapes in the Southwest of Uzbekistan.

Ad B International programs and networks active in Uzbekistan and in neighbouring states such as Kyrgyzstan and Kazakhstan are recommended to be involved to bring in transboundary ex-perience related to instruments and tools on natural resource management. CACILM has already invested by documenting best practices of soil and water conservation in arid landscapes using the World Overview of Conservation Approaches and Technologies WOCAT system. Such ex-perience could be extended to this project as well. This would allow to link the ILUP approach on the one hand to participatory tools oriented to the development of concrete soil and water con-servation technologies and on the other hand to the UNCCD process.

Ad C To further widespread application of ILUP, it is strongly recommended to broaden the test within concrete planning situation in target districts from 2 (as foreseen in project) up two 5 target districts.

The level of community planning and the above oblast level have to be included, thus addressing this know-how gap between the two levels (raijon/oblast) of the recent system of "Territorial plan-ning in Uzbekistan". It is recommended to set the criteria for the definition of target districts oriented on three dimensions of sustainability including such for the local socio-economic situa-tion of the population.

Ad C It is recommended that steering of on-the-ground activities in target districts must be regu-larly assessed by impact monitoring and locally defined indicators oriented on the success of par-ticipation and adaptation in/of the ILUP approach.

Ad C Recommendation to use community, district and oblast level outcomes of ILUP approach for policy dialogue to decision makers in Tashkent and Oblast centers – on the basis of on-site "show cases".

- ✓ ***Germany Comments***

Germany approves the PIF. Nonetheless, it has to be clarified that a Co-financing of Grant and in-kind 750.000 mentioned under C. a) would be Co-Financing by BMZ, with GIZ only being the implementing agency of BMZ and b) a GIZ-UNDP cooperation is currently still under negotiation, i.e. not fully clarified. If approved, this could only be a co-financing limited by the GIZ project duration, i.e. ending 12/2014.

The GIZ project on participatory pasture management in Farish Rayon, Jizzakh Oblast (PIF p15) is also considering the option of a joint GEF/UNDP/GIZ project with additional GIZ project funds only for the PPG.

MULTI FOCAL AREA

27. Colombia : Conservation and Sustainable use of Biodiversity in Dry Ecosystems to Guarantee the Flow of Ecosystem Services and to Mitigate the Processes of Deforestation and Desertification. (UNDP) (GEF Project Grant: $8,787,819)

✓ ***Canada Comments***

We note that the PIF has no link to Focal Area outputs in its Section A.

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Switzerland Comments***

Overall Comments

The project addresses different stresses for keeping and sustainably managing dry forest in the Atlantic Region of Colombia. It is especially interesting how the proposal links SMF/SLM with re-duced decertification, biodiversity conservation and mitigation of climate change (through REDD+). This is seen as a major strength of this proposal. Although this level of complexity is challenging, major lessons can be learned, not only for Colombia, but also for other countries. Thus UNDP, as the GEF agency responsible for this project, should secure knowledge transfer beyond the partner country.

The proposal seems to be based on a sound background of technical and natural science related issues. However, the social dynamic in the regions and its impacts on landscape use is not so well documented. This is perceived as a weakness that can jeopardize the long-term sustainabil-ity of the activities of the project.

Questions, Concerns and Challenges for further Project / Programme Refinement

• Social drivers and underlying drivers of resource degradation should be included in the analy-sis and corresponding activities aimed at addressing the most important drivers should be de-fined

• Colombia has set environmental friendly legislation for at least 30 years. The CARs, regional authorities in charge *i.a*. of environmental issues were created in the 80s. In the document it is stated that environmental-friendly legislation has not been implemented at the regional level. It would be important to clarify why, and how the project will address these deficits.

• For securing long-term feasibility it will be important to integrate an economic dimension in the project. In the proposal only payments (or transfers) from REDD+ are considered. Besides the fact that modalities for payments for REDD+ have not yet been agreed within the UNFCCC, the potential for emission reductions and carbon enhancement in dry forest is reduced. It is recommended by this reviewer that the project proponents consider other economic activities that can be pursued when promoting sustainable management of natural resources. It would be good to consider non-timber forest products (NTFP), ecotourism and Payments for Envi-ronmental Services. If so, local communities and local authorities will need to include considerations on skill development and entrepreneurship training.

Conclusions and Recommendations

This proposal is very interesting and deserves support. However it is recommended to address the comments mentioned above, before authorizing the funding.

28. Seychelles: Expansion and Strengthening of the Protected Area Subsystem of the Outer Islands of Seychelles and its Integration into the broader land and seascape (UNDP) (GEF Project Grant: $1,785,500)

✓ ***Canada Comments***

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Germany Comments***

Germany approves the project proposal, but would like to provide the following suggestions for improvements to be made during the drafting of the final project proposal: Bearing in mind that 1) the (future) Seychelles PA System provides a huge potential for marine and terrestrial bioprospecting, and that 2) the Seychelles ABS framework is being updated with respect to the requirements of the Nagoya Protocol, it is suggested that the full project proposal should elucidate how future access regulations to genetic resources from the PA network will look like and how potential benefits arising from ABS agreements could contribute to PA management and financing. In this context, it would be desirable to have in the full proposal a rationale embedded which explains why particular IUCN PA categories and management / governance types have been chosen and what is their particular comparative advantage? This will be instrumental for knowledge management as well as possible up-scaling options of the project approach.

POPs

29. Regional (Burkina Faso, Cape Verde, Gambia, Guinea-Bissau, Mali, Mauritania, Niger, Senegal, Chad) : Disposal Of Obsolete Pesticides Including POPs And Strengthening Pesticide Management In The Permanent Interstate Committee for Drought Control In The Sahel (CILSS) Member States (FAO) (GEF Project Grant : $7,450,000)

✓ ***Canada Comments***

[850 tons of POPs disposed ($6.9M) - $8,179/ton]

- We agree with the STAP that the PIF is quite comprehensive and appears sensitive to the unique issues and circumstances in the Sahel. However, we support the improvements suggested by the STAP, particularly acknowledging the gendered division of labour in agriculture and the associated exposure level to pesticides.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

✓ ***Denmark Comments***

- Comprehensive, well written and clear description. Very relevant and strong in-build poverty orientation in the sense that the poor will be the most affected and harmed by mismanagement of POP´s

- Regarding risks: Some Danida experiences with similar activities in the late 90-ties up to 2002:

    - International NGO´s or national NGO´s might chose to intervene in the process with the purpose of making the producers responsible (and pay for) the cleaning-up or creating resistance against stockpiling and destruction of POP´s/Obsolete Pesticides in specific locations. Activity 1.1.4 (Disposal in "an environmentally sound manner" (locally) might then become hindered and the activity seriously delayed, more expensive or even impossible to carry out as planned).

- The actual locality chosen for stockpiling of POP´s before destruction is critical for minimising risks for potential environmental disaster. In Mozambique unprecedented and unexpected flooding in year 2000 almost developed into disastrous pollution of the waterways caused by the flooded stock of obsolete pesticides already compiled and concentrated for later destruction

- It would probably make sense to allocate some focus on the issue of legal or illegal import of (almost already) obsolete pesticides as well in order to minimise the size of the problem.

- The project seems to be well imbedded into relevant existing regional structures (Comité Inter Etats de Lutte contre la Sécheresse au Sahel – CILSS)

✓ ***Switzerland Comments***

Overall Comments

We fully agree with the opinions as expressed in the STAP-Review Wellington-Moore/Bouwman and support the suggestion to take gender aspects better into consideration, especially in connection with awareness and capacity building, of seasonality and climate vulnerability, and optimizing lab capacity.

Questions, Concerns and Challenges for further Project / Programme Refinement

Because of the quantity and variety of participants, co-financing institutions, involved organizations and ongoing projects in the field, in which the GEF-project is planned to be embedded, there is a certain risk of high transaction costs which may lessen teh funding available for action on the ground.

Conclusions and Recommendations

While further refining the project, special attention should be paid to:

• clearly defining responsibilities for every element of the project;

• taking into account the work and the results of completed or ongoing projects in the field as well as to the experience gained by those involved;

• not duplicating elements of the project in different countries, wherever collaboration or tak-ing-over of standardised solutions are possible.

• close follow-up of the execution, comprehensive controls and evaluation of outcome and impacts.

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

- ✓ ***Germany Comments***

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

In the context of project component two, a collecting–and-recycling system for used pesticide containers is supposed to be implemented. According to the current description, an involvement of the private sector is not envisaged. We doubt that without the involvement of the private sector such a system would operate successfully in the long run. Hence, we advise to try to get the private sector involved, in particular of the informal collectors.

30. Benin: Disposal of POPs and Obsolete Pesticides and Strengthening Life-cycle Management of Pesticides (FAO) (GEF Project Grant: $1,830,000)

✓ ***Canada Comments***

[250 tons of POPs disposed ($3.85 million) - $15,400/ton]

There is no rationale for the relatively high per ton cost of disposing POPs. While this is Benin's first POPs disposal project, this should be addressed in the PIF.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

✓ ***Denmark Comments***

- The problem analysis seems OK, though it is not quite clear if the amount of illegal pesticides, including endosulfan, coming into Benin and being used by the farmers is more or less the same as before Benin banned endosulfan in November 2009.
- Inconsistency between the B. Project Framework table and the text in B.2. The Framework table mentions disposal of approx.. 250 tons of existing POPs and other obsolete pesticides, whereas the text in B.2 describes "600 tons of POPs obsolete pesticides including 350 tons of endosulfan will be disposed of, and contaminated sites posing immediate risk to human health and the environment will be remediated." Apparently, the disposal will take place in Mali, but how it will be done and what the facilities for such disposal in Mali are not mentioned or described. (It would actually be quite interesting, as Mali does probably not have a plant like KOMMUNEKEMI in Denmark.)
- Component 3. "Strengthening the regulatory framework and institutional capacity for sound pesticide management" does not give many details on how enforcement of the existing regulations and the pesticide legislation law will be strengthened.
- Seven other initiatives in the African region are mentioned, with which this project will be coordinated.
- The project is well aligned with Benin's efforts to improve management of pesticides.

- Denmark has phased out its support to the Agricultural Sector in Benin, but this project "Disposal of POPs and Obsolete Pesticides and Strengthening Life-cycle management of Pesticides" is definitely still highly relevant.

✓ ***France Comments***

The project focuses on interventions related to safe disposal of pesticide POPs and other obsolete pesticides. It will not only deal with the disposal of existing POPs and obsolete pesticides but also has a strong capacity building component.

We globally support the initiative, but we would like to underline the importance of taking into consideration social aspects, especially considering all the activities linked with the change of behaviour. To encourage behavioural change, marketing social approaches could be used, bases on baseline studies to define motivating factors and willingness to change.

Opinion: favourable

✓ ***Germany Comments***

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

In the context of project component two, a collecting–and-recycling system for used pesticide containers is supposed to be implemented. According to the current description, an involvement of the private sector is not envisaged. We doubt that without the involvement of the private sector such a system would operate successfully in the long run. Hence, we advise to try to get the private sector involved, in particular of the informal collectors.

31. Cameroon: Disposal of POPs and Obsolete Pesticides and Strengthening Sound Pesticide Management (FAO) (GEF Project Grant: $1,710,000)

✓ ***Canada Comments***

[300 tons disposed ($2.13M) - $7,100/ton]

- We agree with the STAP recommendation to highlight how climate vulnerability is taken into consideration, as is the case in other similar projects, for future lessons learned.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

✓ ***Germany Comments***

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

In context of project component two, a collecting–and-recycling system for used pesticide containers is supposed to be implemented. According to the current description, an involvement of the private sector is not envisaged. We doubt that without the involvement of the private sector such a system would operate successfully in the long run. Hence, we advise to try to get the private sector involved, in particular of the informal collectors.

In project component three, the intention to upgrade an already existing laboratory is mentioned. We would like to have further information on the costs for analytical equipment and especially on the fixed costs to keep the laboratory operative in the long run. Who is supposed to cover the fixed costs in the future?

32. India: Development and Promotion of Non-POPs alternatives to DDT (UNIDO/UNEP), (GEF Project Grant: $10,000,000)

✓ ***Canada Comments***

It seems that this project will duplicate work being done by the Global Alliance for Alternatives to DDT, established by the Stockholm Convention COP in 2009. The STAP has also identified several major revisions, including the presumption that Neem Products (an alternative to DDT) have few or no toxicological effects. Similar projects funded by the GEF have focused on introducing and scaling-up alternatives to DDT, not identifying alternatives within the project.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

33. Indonesia: Introduction of an Environmentally Sound Management and Disposal System for PCBs Wastes and PCB Contaminated Equipment in Indonesia (UNIDO) (GEF Project Grant : $6,000,000)

✓ ***Canada Comments***

[3000 tons POPs disposed ($16.9M) - $5,633/ton]

- Based on the preliminary PCBs inventory, it is estimated that there is about 23,000 tons of PCB contaminated oil to manage. The PIF should clearly stipulate how the remaining 20,000 tons that will not be disposed will be handled or stored.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

✓ ***Switzerland Comments***

Overall Comments
According to the *Project Review Sheet*, PIF-drafts passed four times through the Secretariat and various aspects have been commented on in detail.

Unfortunately, at the moment of this review, the STAP-reviewer's comments were not available on the GEF's website.

Questions, Concerns and Challenges for further Project / Programme Refinement
As the GEF has already financed a series of similar projects in different countries and UNIDO as executing agency has been working for years in the field of PCB management and disposal, there is legitimate expectation and confidence, that

• the elements of the project will, after the phase of detailed planning, be tailored to the specific situation in Indonesia,
• the abundant guidance for environmentally sound management of PCB and the lessons learned in similar projects are taken into consideration,

• within this project unnecessary studies and pilots will be avoided by directly adopting BAT/BEP for every technical solution (as stated in the numerous declarations "*the project will.....".* .

INTERSESSIONAL WORK PROGRAM: COMMENTS FROM COUNCIL MEMBERS (Reference GEF GEF/IS/25

Conclusions and Recommendations

While elaborating the details of the project, the expertise offered by the GEF-Secretariat and the STAP should be used. We consider a STAP approved review (considering also the aspects men-tioned above) as mandatory prior to submission of the project brief for CEO endorsement.

34. Kazakhstan: NIP Update, Integration of POPs into National Planning and Promoting Sound Healthcare Waste Management in Kazakhstan (UNDP) (GEF Project Grant: $3,400,000)

✓ ***Canada Comments***

The project should consider lessons learned from similar projects (Tunisia GEF ID: 2995, and Global GEF ID:1802).

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

✓ ***Switzerland Comments***

Overall Comments

According to the *Project Review Sheet*, PIF-drafts passed four times through the Secretariat and have been commented in extenso on various aspects. The PIF now recommended for clearance still consists in principle of 3 more or less isolated projects: NIP-update, mercury and POPs in connection with Health Care Waste Management (HCWM).

Questions, Concerns and Challenges for further Project / Programme Refinement
It is not clear, whether the mercury or the POP issues in connection with HCWM are of a high pri-ority in the implementation of the NIP: emission inventories are not accurate, the measures de-scribed for sound HCWM would reduce the overall TEQ emissions by roughly estimated 1.5%, by using 75% of the required funds.

A thorough update of the NIP seems necessary to allow prioritization of the fields of interventions that guarantee a rational use of the scarce financial means. It seems unlikely that such an update (including capacity building measures) can be made with less than 400’00 USD.

About 75% of the funds are foreseen for *Minimization of uPOPs emissions (and mercury from medical devices) through demonstration of sound HCWM.* The measures listed seem to be mostly of the soft type (such as: mapping, tracking, planning, training, minimizing, cooperating, etc), it is not clear whether part of the funds are also used for improved facilities.

According to a comprehensive concept for sound HCWM, tailored to local conditions and having good chances for implementation, the necessary measures can be defined and the dis-posal/destruction facilities realized.

Conclusions and Recommendations

In teh light of teh concerns expressed, we recommend dividing the project into two phases and executing the steps accordingly:

Phase 1:

1. Detailed and comprehensive NIP update
2. Identification of priority measures to reduce emissions with great efficiency and effective-ness, in fields that are identified as relevant to achieve essential impacts (maybe mer-cury/POPs in connection with HCWM, maybe others are more important?).
3. Elaborate and submit a project proposal according to the determined priorities for phase 2

Phase 2:

4. Project review – clearance
5. Realization of the measures step-by-step
6. Controls of the elements executed and evaluation of outcomes and impacts

35. Morocco: Disposal of Obsolete Pesticides including POPs and Implementation of Pesticides Management Programme (FAO) (GEF Project Grant: $3,500,000)

✓ ***Canada Comments***

[1000 tons POPs disposed ($4.4M) - $4,440/ton]

- Although this is the most cost effective disposal project on a per ton basis, only 15% of the gross project funds are allocated for disposal. Additionally, this is Morocco's second POPs disposal project. The first was part of the regional "Africa Stockpiles Programme" which did not achieve its objectives.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

✓ ***Germany Comments***

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

In the context of project component two, a collecting-and-recycling system for used pesticide containers is supposed to be implemented. According to the current description, an involvement of the private sector is not envisaged. We doubt that without the involvement of the private sector such a system would operate successfully in the long run. Hence, we advise to try to get the private sector involved, in particular of the informal collectors.

36. Pakistan: Comprehensive Reduction and Elimination of Persistent Organic Pollutants (UNDP) (GEF Project Grant: $5,150,000)

✓ ***Canada Comments***

[1500 tons POPs disposed within Pakistan ($17 M) - $14,766/ton]

- Other similar projects include a component to inform communities about the dangers of repurposing POPs containers, this project should strive to include this. Which POPs, or types of POPs (i.e. pesticides) does the project address? Will the project be disposing of just the 1,200 of obsolete POPs stockpiles, or also the 300 tons of PCB in equipment? We note that if the project is only including the disposal of obsolete POPs and not POPs in equipment, the cost per ton would be $14,766/ton, which is higher than most POPs disposal projects.

Since many of the Disposal projects are very similar, they should strive to include lessons learned in the PIFs. The focus on these projects is on disposing of POPs. However, these projects allocate varied amounts to the specific activity of disposing of POPs. As this is the central activity of the project, the projects should strive to maximize the amount of project resources allocated to POPs disposal activities. There should also be a concerted effort to coordinate the initiatives of countries in the same regions (i.e. Benin and Cameroon) to take advantage of economies of scale and share information on challenges faced and on the resulting improvements for pesticide management. It is promising that these projects are about capacity building and the actual management of POPs, rather than simply updating NIPs.

SUMMARY OF PIFS5 UNDER PREVIOUSLY APPROVED PROGRAMMATIC APPROACHES

1. **China: Strengthening the Management Effectiveness of the Protected Area Landscape in Altai Mountains and Wetlands (UNDP) (GEF Project Grant: $3,544,679) under the CBPF-MSL Mainstreams of Life – Wetland PA System Strengthening for Biodiversity Conservation Program**

✓ ***Canada Comments***

All of the biodiversity projects being proposed should provide information on how they relate to the country's obligations to the CBD, particularly the Aichi Targets. As presented, the PIFs is not clear on how it will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

✓ ***Switzerland Comments***

Overall Comments

The project addresses key conservation issues typifying the biodiversity-rich trans-boundary Altai Mountain ecosystems. The focus on wetland- and associated watershed conservation is well chosen and of greatest ecological and economic importance within a geographic region display-ing already measurable signs of global climate change. Water within this region is a key issue, being of critical importance to the livelihood of traditional nomadic herders and their livestock as well as to the survival of the biodiversity-rich wetlands located within the lower reaches and flood plains of the targeted watersheds.

The conservation barriers related to the target area are well documented by the proposal, with un-controlled mining, overgrazing of sensitive subalpine grasslands and land tenure issues (free range access) being of special concern.

Questions, Concerns and Challenges for further Project / Programme Refinement
The project could be improved by using a more holistic approach to watershed management. This implies participatory integrated spatial land-use planning to cover entire water catchment areas. Spatial land-use planning is essential for the identification of gaps in the protected area system and would provide a sound basis for wise land-use decisions. One result of participatory planning should be inter alia the production of regional and local ecological sensitivity maps providing guidance to decision makers regarding sustainable land-use issues. For the proposed project this implies additional efforts in order to create an enabling political, administrative and regulatory framework and capacity development of all stakeholders to be involved in integrated spatial land-use planning.

The risk assessment as presented appears rather weak and not critical enough. The majority of the identified risks and barriers to biodiversity conservation should be rated high with a low mitiga-tion potential. This applies in particular to all issues related to mining and free range access. The risks and mitigation potential associated with obvious competing and overlapping land and re-source-use mandates on a regional level should also be addressed.

It is not clear, how the proposed 40% budget increase on a regional and local level for improved management of the PA network will be achieved.

It appears doubtful that GEF efforts will be able to effectively address the issues of increasing habitat fragmentation, the required integrated participatory spatial land-use planning, and sustainable economic development in the target area.

Conclusions and Recommendations

This programmatic approach meets GEf's strategic objectives and national qualifying criteria und should be endorsed in principle with due consideration of the expressed concerns.

It is recommended that the project places stronger emphasis on trans-boundary cooperation. This is of special significance for the protection of micro-watersheds shared by Mongolia and China and with respect to migratory mammals (i.e. Argali sheep) with home ranges straddling the inter-national boundary.

2. Russian Federation: Conserving Biodiversity in the Changing Arctic (UNEP) (GEF Project Grant: $5,733,944) under the ARCTIC GEF – Russian Federation partnership on Sustainable Environmental Management in the Arctic under a Rapidly Changing Climate (Arctic Agenda 2020)

✓ ***Canada Comments***

We would like to commend Russia on its efforts to expand biodiversity conservation in the Arctic Region. The project includes strong linkages to work at Arctic Council, which is very positive. We note that the co-financing envisioned is a little low given the opportunities that would seem to exist with key project stakeholders and interested third parties, including natural resource extractive industries in particular. Their contribution of approximately $2.2 million could be increased. Canada shares the STAP's views that while the PIF provides detailed information about specific activities, it needs to do a better job of linking these activities back into a logical project framework and focus on how project interventions will lead to outcomes and global environmental benefits. This is a very ambitious project with many challenging and undefined elements. Canada therefore looks forward to seeing the STAP's comments addressed in a revamped PIF in the near future.

✓ ***USA Comments***

- We would request that this PIF be pulled from the work program and revised and resubmitted

We believe that the overall goals of the project are positive and address important biodiversity conservation priorities. However, we agree with the STAP that the project is not ready to be recommended at this time. The project proposal lacked cohesion and requires more focus and detail on the objectives of the project. Further, we found the project too complicated and ambitious for the implementation during just a four-year period with requested resources, and with the large number of actors and partners it is going to involve.

It's also unclear exactly how this GEF proposal will benefit and streamline work with ongoing efforts, such as that of WWF-Russia and the CAFF working group of the Arctic Council. Many of the "expected outputs" need to be institutionalized over the course of 20 years or more (such as 1.3.2) and are not tasks that can be accomplished and checked off as complete in the timeframe allotted. It is also not clear how the establishment of a park in Chukotka or an international agreement is tied to the outcomes.

Finally, while indigenous communities are mentioned in the proposal, we would like to see a more concrete explanation of ways in which they would be engaged. Should the project significantly involve the region's indigenous peoples, its capacity to positively impact biodiversity would be enhanced and the project could complement other efforts such as the proposed Beringia Shared Heritage Sister Park Arrangement.

✓ ***Switzerland Comments***

Overall Comments
This is a well prepared, scientifically and technically sound, globally important and timely project of great relevance. It meets important GEF strategies and numerous other national and interna-tional qualifying criteria. The selected target areas are of critical ecological importance and cover some of the globally most threatened and important ecosystems highly susceptible to climate change. At the same time the targeted arctic tundra, peat and coastal transitional ecosystems play a key role as significant carbon sinks reflecting the true meaning of ecosystem goods and services.

The project addresses sustainable biodiversity conservation through the proposed strengthening of existing protected areas in cooperation with local indigenous people, government agencies on the national, regional and local level, and private sector stakeholders, inside and outside the pro-tected areas. The holistic approach of this project is highly commendable. The root causes of key threats to the targeted ecosystems are well defined and practical mitigation measures are pro-posed convincingly. The indicators chosen to monitor project success and cost effectiveness are practical and easy to apply.

GEF's incremental contribution is well argued and documented. The proposal's comprehensive risk assessment is honest and the corresponding mitigation measures appear realistic.

Questions, Concerns and Challenges for further Project / Programme Refinement
The PIF document is unusually long but very comprehensive. It is suggested that the project could be improved through better integration of indigenous people and other stakeholders into the decision-making and implementing process in order to achieve ownership in sustainable conser-vation efforts.

Conclusions and Recommendations
This programmatic approach should be fully endorsed.

✓ ***Germany Comments***

Germany approves and welcomes the project proposal, which covers all relevant aspects of biodiversity conservation and climate change issues. The three components of the project address mitigation, adaptation and the sustainable management and use of biodiversity. In addition, we would like to provide the following suggestions for improvements to be made during the drafting of the final project proposal: From an economic perspective, the project should possibly take aspects of both Payments for Ecosystem Services (PES) and of the Economics of Ecosystems and Biodiversity (TEEB) more into consideration, in order to explore concepts of economic valuation of natural resources and its adequate integration into political and economic decision-making.