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SV: Decision by Mail: Council review and approval of the February 2012 Intersessional Work Program

Dorte Broen

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Please find attached the comments from Denmark to the following projects:

Disposal of POPs and Obsolete Pesticides and Strengthening Life-cycle Management of Pesticides. Ministries of Agriculture, Environment and Public Health, Benin and FAO. Total project cost USD 11.86 mill. – GEF Grant 1.86:

- 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.

Conservation and Sustainable Use of Biodiversity in Coastal and Marine Protected Areas (MPA’s). Ministry of Natural Resources and Environment of Guatemala (MARN); National Council of Protected Areas (CONAP); The Nature Conservancy (TNC) and UNDP. Total project cost 21,635,989 USD – GEF Grant 5,445,454 USD:

- 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).

Honduras. Strengthening the Sub-System of Coastal and Marine Protected Areas. Directorate of Biodiversity (DIBIO) of the Environment Ministry (SERNA), Institute of Forest Conservation (ICF) and the General Directorate of Fisheries (DIGEPESCA) of the Ministry of Agriculture and Livestock (SAG) and UNDP. Total project cost 14,636,364 USD – GEF Grant 3,136,364 USD:

- 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 for 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 project's 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 it is 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

Implementation of National Biosafety Framework for Ghana (GEFSEC ID: 3045). Biotechnology and Nuclear Agriculture Research Institute, Ministry of Environment, Science and Technology (BNARI) and UNEP. Total project cost 1.436.364 Million USD. GEF Grant 636.364 Million USD:

- In general no remarks – interventions seems to be justified and well-targeted
- However, the issue on “trackability” of goods is important with regard to export of agricultural products to EU (EU Law on GMO’s from 2003). It seems to be somehow overlooked. EU Customs will request info on locality of production site/name of farmer for all agricultural production with GMO content. In terms of “preparedness” it seems to be an important issue to address how “trackability “ could be obtained.
- Well aligned with Ghana PRSP and the National Biodiversity Strategy and National Biosafety Framework (NBF 2004).

India. Developing an Effective Multiple Use Management Framework for Conserving Biodiversity in the Mountain Landscapes of the High Ranges, Western Ghats. Min. of Environment and Forests, Dept. of Forests and Wildlife, Kerala and UNDP. Total project cost 36.9 Million USD. GEF Grant 6.9 Million USD:

- 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)

Sahel region. Disposal of Obsolete Pesticides including POPs and Strengthening Pesticide Management in the Permanenet Interstate Committee for Drought Control in the Sahel Member States. CILSS Executive Secretariat and FAO. Total project cost 47.5 Million USD. GEF Grant 7.5 Million USD:

- 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)

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Emne: Decision by Mail: Council review and approval of the February 2012 Intersessional Work Program

Dear Council Member,

Please find below the letter of notification from Monique Barbut, GEF CEO and Chairperson, on the posting of the GEFTF February 2012 Intersessional Work Program for the Council's review and approval by mail. Council Members are invited to submit their comments to the GEF Secretariat's program coordination registry at gcoordination@thegef.org.

Please note that the STAP reviews for projects 4505 Peru and 4665 Russian Federation will be made available by early next week to accommodate their delayed entry into the work program.

Thank you and best regards,

(See attached file: Letter to Council 1-30-2012.pdf)
<http://www.thegef.org/gef/IWP>