



Canada's comments on the GEF work program discussed at the 41st Council Meeting

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Dear Colleagues,

Thank you for the opportunity for Canada to provide written comments on the GEF Work Program that was discussed at the 41 GEF Council meeting. Canada notes with appreciation that this work program is the most robust and one of the largest ever presented to the Council, totalling more than half a billion dollars. The quality of the work program is high, and we commend the recipient countries, the GEF Secretariat and the various implementing agencies for their work. We are particularly pleased that GEF financing for the incremental costs of the projects is supported by co-financing at unprecedented levels – a 1 to 8.6 ratio.

General Comments:

- We note that the work program continues to reference a POPs focal area, instead of the Chemicals Focal Area. In fact, it sometimes mentions an Ozone Focal Area, and a Sound Chemicals Management and Mercury Pilot focal area. This should be corrected given the fact that the GEF-5 programming document refers to the Chemicals focal area.
- We are pleased to see more chemicals focal area projects presented in this work program. We are glad to see countries starting to focus on actions required to implement the Stockholm Convention. It is unfortunate, however, that no mercury pilot projects have yet been presented.

Comments on Specific Projects/Programmes:

In terms of specific proposals, we are particularly impressed with several projects:

- The regional programmatic approach “Asian Sustainable Transport and Urban Development Program (ASTUD)” (ADB/World Bank) in Bangladesh, China and Mongolia which seeks to support Asian cities in realizing GHG emission reduction and local co-benefits through the integration of low-carbon transit structure. The program expects direct GHG emission reduction of 17 to 18 million tons of CO<sub>2</sub> equivalent, and includes co-financing of \$988 million.
- Canada would like to congratulate Brazil and the World Bank for developing a quality proposal in the “Brazil Marine and Coastal Protected Areas” project, and showing a solid commitment to expanding marine protected areas in Brazil. We also believe that the involvement of Petrobras in this proposal is positive and will no doubt provide a good example for enhanced engagement of the private sector through GEF projects. The STAP makes some good suggestions to further improve the proposal, which we look forward to seeing when it is presented for approval.
- The Colombia “Development of National Capacity for the Environmentally Sound Management and Disposal of PCBs” project provides good engagement with the private sector, and a good level of private sector co-financing. It would be important to clarify in the final project proposal if the project will indeed be able to remove all barriers to safe management and disposal of PCBs, particularly the high costs and the lack of facilities for PCB disposal.

We also have several comments and concerns on specific proposals:

- On the **China Municipal Solid Waste Management** project: Canada agrees with GEF STAP comments in that the project focuses on BAT/BEP for incineration of municipal solid waste and, therefore, the reduction of dioxins and furans, instead of looking at upstream alternatives to incineration such as waste reduction, recycling, composting, etc... We also wonder that given that China’s municipal solid waste is high in organic matter and has a low calorific value, if incineration is indeed the best option for China’s municipal solid waste. Finally, we note that the 2<sup>nd</sup> most important source of global mercury emissions is the incineration of municipal solid waste. We wonder, therefore, if the GEF should be supporting a project that focuses on this.
- On the **Algeria Environmentally Sound Management of POPs and Destruction of PCBs Wastes** initiative, it is not clear if 5,000 tonnes or 2,336 tonnes of PCBs are to be phased out through this project. Additionally, the cost appears relatively high compared to other similar initiatives. One reason may be the focus on disposing of PCB waste domestically instead of taking advantage of available, lower cost opportunities outside of Algeria. We wonder if the GEF should fund this higher cost because Algeria has a preference to dispose of PCB waste within its borders? What is the incremental cost?
- On the **Vietnam Hospital Waste Management Support** project, we note that Vietnam has already benefitted from one hospital waste project through the UNDP global project “Demonstrating and Promoting Best Techniques and Practices for Reducing Health-care Waste to Avoid Environmental Releases of Dioxins and Mercury”. We note that there are other priority areas listed in Vietnam’s NIP for the Stockholm Convention that have not yet received any support.
- On the **Global SolarChill Development** project, we note that this technology has benefitted from over ten years of support from various entities, funds and investors. We wonder, therefore, if additional grant support is what is required. This is particularly relevant given that, after reading the details in the PIF, the proposal is not for technology development, but for demonstration and marketing / market analysis. Perhaps it would be best for the GEF to look at using a non-grant instrument for this project. We also note that the co-financing from the Multilateral Fund of the Montreal Protocol is through a UNDP project. However, UNDP is not mentioned in the project proposal, and it is not clear that the UNDP MLF project is completely aligned with this GEF proposal.

- On the **Bangladesh Development of Sustainable Renewable Energy Power Generation** project, we share the STAP's concerns on why / how the three specific renewable energies were selected. We also note that the type of private sector co-financing included in the proposal is listed as "unknown". This should be clarified as the project proposal is further developed. We note that this sector can be particularly attractive for private sector investment.
  
- On the **Bolivia Conservation and Sustainable Use of Agrobiodiversity to Improve Human Nutrition in Five Macro Eco-regions** project, we note the comment made by the STAP that numerous agrobiodiversity projects have been supported in Bolivia over the years. While coordination and complementarity are clearly explained, we wonder if indeed another GEF-supported agrobiodiversity project in Bolivia is needed, given all of the new priorities and targets established at the CBD COP-10. We also note that the proposal focuses on agrobiodiversity for food security in Bolivia, and focuses on several key local crops. While this is certainly important for Bolivia's food security and should be supported, we wonder if it should be the GEF, with its focus on global environmental benefits, that should be called upon to provide this support.
  
- On the project entitled "**Global Sustainable Fisheries Management and Biodiversity Conservation in the Areas Beyond National Jurisdiction**" with FAO/UNEP/World Bank, as a fishing nation, Canada supports the initiative. Poorly managed international fisheries resources and illegal fishing operations undermine a nation's domestic efforts at strong fisheries management, reduce fishing opportunities for fish harvesters, and undercut international prices for globally trade fish and seafood products. Initiatives, such as the FAO Compliance Agreement, Port State Measures Agreement, International Plan of Action on Illegal, Unreported and Unregulated Fishing, and Global Record of Fishing Vessels, are regarded as key activities in the fight against illegal, unreported and unregulated fishing, although implementation of these initiatives can be costly for many States, due to the need for capacity building, creation of global databases, and creation of information sharing mechanisms. Science for stock assessments is constantly being improved; science for ecosystems affected by fishing activities is a relatively new area of investigation and much science still remains to be developed, particularly to support policy priorities, such as the identification and protection of vulnerable marine ecosystems from impacts of some fishing activities. Basic data collection is often lacking, which undermines the ability not only of States to undertake management efforts, but also for regional fisheries management organizations to establish robust science-based recommendations. Biodiversity conservation can be improved through better science understanding, which in turn is based on proper data collection of fishing levels of target fish species, bycatch species, and biological characteristics, species interactions, and Habitats. Canada continues to support efforts to improve management and enforcement of the world's fisheries along with efforts to identify and protect marine biodiversity components through global cooperation and coordination, capacity building and improved science, which this initiative will help to address. The Program on Global Sustainable Fisheries Management and Biodiversity Conservation in Areas Beyond National Jurisdiction is an innovative program and GEF involvement in this area is crucial because it will bring together countries and the fishing community at all points along the processing line, including industry and relevant global agencies and conventions thereby enabling a new framework and a way forward in ABNJ. The proposed multi-focal area program consists of four projects that will promote efficient and sustainable management of fisheries resources and biodiversity conservation in the ABNJ, in accordance with the global targets agreed in international forums.

Once again, thank you for the opportunity to provide our input.

Regards,

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