



GEF Council--February 2012 Intersessional Work Program--comments from Canada  
JAN.SHELTINGA

to:

gcoordination

02/24/2012 02:40 PM

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History: This message has been forwarded.

Dear Secretariat,

Thank you for the opportunity to provide comments on the February 2012 Intersessional Work Program. Attached please find comments from Canada on the following projects:

### **CLIMATE CHANGE PROJECTS**

#### Colombia - Low-carbon and Efficient National Freight Logistics Initiative

- 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.

#### Dominican Republic - Stimulating Industrial Competitiveness Through Biomass-based, Grid-connected Electricity Generation

- 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.

India - Preparation of Third National Communication (3NC) to the UNFCCC and Strengthening Institutional and Analytical Capacities on Climate Change

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

India - Promoting Business Models for Increasing Penetration and Scaling up of Solar Energy

- 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.

## **BIODIVERSITY PROJECTS**

General comment on biodiversity projects:

- With the exception of the Guatemala project "Conservation and Sustainable Use of Biodiversity in Coastal and Marine 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 are not clear on how they will help the country meet the Aichi targets. The project proponents should provide this information in the final project proposals.

China "A Landscape Approach to Wildlife Conservation in Northeastern China":

- 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.

Guatemala "Conservation and Sustainable Use of Biodiversity in Coastal and Marine Protected Areas (MPAs)":

- 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.

India "Developing an Effective Multiple Use Management Framework for Conserving Biodiversity in the Mountain landscapes of the High Ranges, Western Ghats":

- 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?

Mexico “Strengthening Management Effectiveness and Resilience of Protected Areas to Protect Biodiversity under Conditions of Climate”:

- 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?

Peru “Conservation and Sustainable Use of High-Andean Ecosystems through Compensation of Environmental Services for Rural Poverty Alleviation and Social Inclusion in Peru”

- 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 loan 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?

Peru “Strengthening Sustainable Management of the Guano Islands, Islets and Capes National Reserve System”

- 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.

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”:

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

Russian Federation “ARCTIC Conserving Biodiversity in the Changing Arctic”:

- 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.

## **POPS PROJECTS**

India - UNIDO/UNEP Development and Promotion of Non-POPs alternatives to DDT

- 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.

Kazakhstan - NIP Update, Integration of POPs into National Planning and Promoting Sound Healthcare Waste Management in Kazakhstan

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

### **POPs Disposal Projects – General Comments**

- 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.

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 (GEF \$7.45M, co-financing \$40.04M)

[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.

Benin - Disposal of POPs and Obsolete Pesticides and Strengthening Life-cycle Management of Pesticides (GEF \$1.83M, co-financing \$10.03M)

[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.

Cameroon - Disposal of POPs and Obsolete Pesticides and Strengthening Sound Pesticide Management (GEF \$1.71M, co-financing \$7.55M)

[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.

Morocco - Disposal of Obsolete Pesticides including POPs and Implementation of Pesticides Management Programme (GEF \$3.5M, co-financing \$25.73M)

[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.

Indonesia - Introduction of an Environmentally Sound Management and Disposal System for PCBs Wastes and PCB Contaminated Equipment in Indonesia (GEF \$6M, co-financing \$24M)

[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.

Pakistan - Comprehensive Reduction and Elimination of Persistent Organic Pollutants in Pakistan (GEF \$5M, co-financing \$20M)

[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.

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

Regards,

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Date: 01/30/2012 05:42 PM

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

Sent by: rmesa@thegef.org

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\[attachment "Letter to Council 1-30-2012.pdf" deleted by JAN SHELTINGA/ACDI-CIDA/G\\_C/CA\]](http://www.thegef.org/gef/IWP[attachment )