



GLOBAL ENVIRONMENT FACILITY
INVESTING IN OUR PLANET

COMPILATION OF COMMENTS
SUBMITTED BY COUNCIL MEMBERS
ON THE GEF
APRIL 2016
INTERSESSIONAL WORK PROGRAM

NOTE: This document is a compilation of comments submitted to the Secretariat by Council members concerning the project proposals presented in the GEF April 2016 Intersessional Work Program

TABLE OF CONTENTS

BIODIVERSITY 3

1. Brazil - National Strategy for Conservation of Threatened Species (PROSPECIES) - FUNBIO - GEF ID = 92713
2. Chile - Establish a Network of National Important Agricultural Heritage Sites (NIAHS) - FAO - GEF ID = 90683
3. Djibouti - Mitigating Key Sector Pressures on Marine and Coastal Biodiversity and Further Strengthening the National System of Marine Protected Areas in Djibouti - UNDP - GEF ID = 92154
4. South Africa - Development of Value Chains for Products derived from Genetic Resources in Compliance with the Nagoya Protocol on Access and Benefit Sharing and the National Biodiversity Economy Strategy - UNDP - GEF ID = 92554
5. Turkey - Addressing Invasive Alien Species Threats at Key Marine Biodiversity Areas – UNDP - GEF ID = 9233.....6

CHEMICALS AND WASTE..... 7

6. Regional - Regional project on the Development of National Action Plans for the Artisanal and Small Scale Gold Mining in Africa– UNEP - GEF ID = 92767
7. Belarus - GEF-6 POPs Legacy and Sustainable Chemicals Management - UNDP - GEF ID = 80178
8. China - Capacity Strengthening For Implementation of Minamata Convention on Mercury - World Bank - GEF ID = 9240.....8
9. Ecuador - National Program for the Environmental Sound Management and Live Cycle Management of Chemical Substances - UNDP - GEF ID = 9203.....10
10. Jordon - Reduction and Elimination of POPs and Other Chemical Releases through Implementation of Environmentally Sound Management of E-Waste, Healthcare Waste and Priority U-POPs Release Sources Associated with General Waste Management Activities - UNDP - GEF ID = 9189.....11
11. Mexico - Environmentally Sound Management and Destruction of PCBs in Mexico: Second Phase - UNDP - GEF ID = 921411
12. Nigeria - Environmentally Sound Management and Disposal of PCBs - UNDP - GEF ID = 923612
13. Thailand - Greening the Scrap Metal Value Chain through Promotion of BAT/BEP to Reduce U-POPs Releases from Recycling Facilities - UNIDO - GEF ID = 922213

CLIMATE CHNAGE 13

14. India - Grid-Connected Rooftop Solar PV Program - World Bank- GEF

ID = 9249	13
15. Tonga - Outer Island Renewable Energy Project - ADB - GEF ID = 9355	14

INTERNATIONAL WATERS..... 15

16. Regional (Egypt, Libya, Sudan, Chad) - Enabling Implementation of the Regional SAP for the Rational and Equitable Management of the Nubian Sandstone Aquifer System (NSAS) - UNDP - GEF ID = 9165	15
17. Regional (Guinea, Liberia, Sierra Leone) - West Africa Regional Fisheries Program, Additional Financing - World Bank - GEF ID = 9360	15

LAND DEGRADATION..... 15

18. Global - Land Degradation Neutrality Target Setting Project - IUCN - GEF ID =9365	15
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MULTI FOCAL AREA..... 16

19. Regional (Cambodia, Lao PDR, Myanmar) - Sustainable Management of Peatland Ecosystems in Mekong Countries - IUCN - GEF ID = 9232	16
20. Regional (Guatemala, Honduras) - Integrated Environmental Management of the Rio Motagua Watershed– UNDP - GEF ID = 9246	17
21. Afghanistan- Community-based Sustainable Land and Forest Management in Afghanistan) – FAO - GEF ID = 9285	18
22. Bolivia - Sixth Operational Phase of the GEF Small Grants Programme in Bolivia - UNDP - GEF ID = 9248.....	18
23. Cameroon: Integrated Sustainable Urban Development (SUDP) and Environmentally Sound Management of Municipal Solid Waste Project in Cameroon - AfDB - GEF ID = 9234.....	20
24. Ecuador - Implementation of the Strategic Plan of Ecuador Mainland Marine and Coastal Protected Areas Network - CI- GEF ID = 9369	21
25. Guatemala - Promoting Sustainable and Resilient Landscapes in the Central Volcanic Chain– UNEP - GEF ID = 9059.....	22
26. Kazakhstan : Conservation and Sustainable Management of Key Globally Important Ecosystems for Multiple Benefits - UNDP - GEF ID = 9193.....	23
27. Madagascar - Sustainable Agriculture Landscape Project – World Bank - GEF ID = 9330	25
28. Mexico - Sixth Operational Phase of the GEF Small Grants Programme in Mexico - UNDP - GEF ID = 9167.....	26
29. Myanmar - Rural Productivity and Ecosystems Services Enhanced in Central Dry Zone Forest Reserves - ADB - GEF ID = 9267	26
30. Pakistan - Pakistan Snow Leopard and Ecosystem Protection	

Program - UNDP - GEF ID = 9231.....	28
31. Pakistan - Sixth Operational Phase of the GEF Small Grants Program in Pakistan - UNDP - GEF ID = 9331	29
32. Palau - Integrating Biodiversity Safeguards and Conservation into development in Palau - UNDP - GEF ID = 9208	30
33. Peru - Sustainable Management of Agro-Biodiversity and Vulnerable Ecosystems Recuperation in Peruvian Andean Regions through Globally Important Agricultural Heritage Systems GIAHS Approach - FAO - GEF ID = 9092	31
34. Serbia - Contribution of Sustainable Forest Management to a Low Emission and Resilient Development - FAO - GEF ID = 9089	31
35. Uzbekistan - Sustainable Management of Forests in Mountain and Valley Areas - FAO - GEF ID = 9190	32

NON-GRANT INSTRUMENT PROJECTS..... 34

36. Regional (Africa) - Investing in Renewable Energy Project Preparation under the Sustainable Energy Fund for Africa (SEFA)(non-grant) - AfDB - GEF ID = 9043	34
37. Regional (Indonesia, Philippines) - The Meloy Fund: A Fund for Sustainable Small-scale Fisheries in SE Asia (Non-grant) - CI - GEF ID = 9370.....	36

**APRIL 2016 GEF INTERSESSIONAL WORK PROGRAM:
COMMENTS FROM COUNCIL MEMBERS
(REFERENCE: GEF/IS/29)**

Germany's Overall Comments

Germany welcomes the GEF TF Intersessional Work Programme, that contains a great number of interesting projects.

Please find attached Germany's comments on the GEF TF Intersessional Work Program April 2016 with the request to take these into account during further elaboration.

We would welcome the inclusion of a short qualitative assessment of the Intersessional Work Programme, as it is done for the regular Work Programmes in preparation of the Council Meetings. This assessment could include inter alia the number of projects, a breakdown of projects per implementing agency and an overview of focal areas concerned. Ideally this assessment should be made available at the time when the PIF for the Intersessional Work Programme are sent out to the Council for comments.

Germany has previously commented that it sees the dominance of certain implementing agencies as critical. Also this time, one single agency is about to implement a large share of the projects and funds planned in the current intersessional work programme. The banks and newly accredited agencies do have their share in the programme, however, we would like to see increases in their share in the future.

USA's Overall Comments

The United States appreciates the opportunity to provide comments on the April 2016 Intersessional Global Environment Facility (GEF) Work Program. Below, please find United States positions on seven projects for incorporation into the written record along with technical input on many of the proposed concepts. We look forward with anticipation to seeing our feedback incorporated in the project proposals before CEO endorsement.

Positions

- The United States, in light of its policies for development projects in certain countries, opposes the following projects:
 1. *Enabling Implementation of the Regional SAP for the Rational and Equitable Management of the Nubian Sandstone Aquifer System* in Chad, Egypt, Libya and Sudan.
 2. *Regional project on the Development of National Action Plans for the Artisanal and Small Scale Gold Mining* project in Africa.
 3. *Investing in Renewable Energy Project Preparation under the Sustainable Energy Fund* project in Africa.

- The United States, in light of its policies for development projects in certain countries, abstains from participating in the decision on the following projects:
 1. *GEF-6 POPs Legacy and Sustainable Chemicals Management* in Belarus
 2. *Capacity Strengthening For Implementation Of Minamata Convention On Mercury* in China and the level of detail provided in the project document is insufficient to evaluate the proposal.
- In Addition, the United States also requests to re-review two proposals at least four weeks before CEO ensorsement:
 1. *The Meloy Fund – A Fund for Sustainable Small-scale Fisheries in South East Asia* in Indonesia and the Philippines
 2. *Development of Value Chains for Products derived from Genetic Resources in Compliance with the Nagoya Protocol on Access and Benefit Sharing and the National Biodiversity Economy Strategy in South Africa*

BIODIVERSITY

1. Brazil - National Strategy for Conservation of Threatened Species (PROSPECIES) - FUNBIO - GEF ID = 9271

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany welcomes the project proposal which aims at mainstreaming species conservation into productive landscapes and sectors.

- The full proposal should identify more clearly opportunities and obstacles/ risks in mainstreaming threatened species into the regulatory framework for existing and established public sectorial policies to promote species conservation (component 1.2). It is recommended to liaise with the Brazilian Forest Service SFB and international cooperation initiatives on biodiversity and land management, in particular in relation to the Rural Environmental Registry (CAR).

✓ USA's Comments

The United States supports this project, notably its component on enforcement, prevention and public awareness campaigns for illegal wildlife trade and poaching. As the proposal is further developed, we request that Funbio reflects on the recommendations provided by the STAP and our comments below:

- The proposal would benefit from additional detail on the nature of the governance framework to be established;
- The structure of the proposal should be revised to reduce duplication and more clearly distinguish among different actions to be taken, such as to combat poaching and address invasive species;
- The proposal should strengthen linkages with Aichi targets;
- The proposal should strengthen the justification of a global environmental benefit

2. Chile - Establish a Network of National Important Agricultural Heritage Sites (NIAHS) - FAO - GEF ID = 9068

✓ Germany's Comments

- Germany approves this PIF.

✓ **Japan's Comments**

- This project promotes the objectives of the Convention on Biological Diversity and Aichi Biodiversity targets (especially Target 7-sustainable Agriculture, 13-genetic biodiversity, 18-participation of indigenous and local communities). Moreover, under this convention (CBD, The International Partnership for the Satoyama Initiative (IPSI) has taken a global approach by seeking to conserve human-influenced natural environments, such as farmlands and secondary forests. Japan recommends to effectively use the accumulated knowledge, experience and networks from those preceding projects.
- Regarding component 2, it is very important to establish a market-based approach such as adding value for agro-biodiversity conservation to products, utilizing landscapes and networks for eco-tourism, and establishing effective branding. Considering unique and sustainable approach with active participation and engagement of local communities are needed.

✓ **USA's Comments**

- The United States welcomes this proposed project. As the proposal is further developed, we request that UNDP reflects on the recommendations made by the STAP, and strengthens the discussion of mitigation measures to sustain biodiversity as well as the methods that will be used to determine success of stakeholder engagement.

3. Djibouti - Mitigating Key Sector Pressures on Marine and Coastal Biodiversity and Further Strengthening the National System of Marine Protected Areas in Djibouti - UNDP - GEF ID = 9215

✓ **Germany's Comments**

- Germany approves this PIF.

4. South Africa - Development of Value Chains for Products derived from Genetic Resources in Compliance with the Nagoya Protocol on Access and Benefit Sharing and the National Biodiversity Economy Strategy - UNDP - GEF ID = 9255

✓ **Germany's Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- With regard to the ambitious aims and broad scope of the Biodiversity Economy

Strategy and the intended contribution of this project for its implementation, Germany requests that three issues be dealt with specifically during the PPG and in the final project document:

- consultations and dialogue with a broader spectrum of companies (domestic / international)
- targeted analyses of market potentials of the supported value chains, including market trends in the respective business fields (incl. regional and other developing country markets)
- capacity development in terms of market access / compliance issues (e.g. quality and regulatory standards in target markets)
- Successful value chain development will also depend on workable access procedures and effective user measures in South Africa. While these issues will be dealt with in the mentioned Global UNDP Project and by the ABS Capacity Development Initiative), Germany considers it crucial that this project makes an explicit link to the activities of the other ABS support activities with respect to regulatory measures which are already ongoing. (Initial) outcomes of the UNDP and the ABS Initiative's projects need to be reflected in the PPG and in the final project document.

✓ **Japan's Comments**

- A part of component 1 in this project seems to be addressed to business development activities, while it is unclear how the R&D for commercialization and marketing activities finally ensure better conservation and sustainable use of biological diversity in South Africa. We would like to see more explanation for this point.
- JICA and Southern African Development Community (SADC), as a Regional Economic Community comprising 15 member states in South Africa established in 1992, are jointly implementing its first technical cooperation titled "the project for Forest Conservation and Sustainable Management of Forest Resources in Southern Africa (JICA-SADC forest project)" since June 2015. In order to create synergy, close coordination with JICA is highly recommended.

✓ **USA's Comments**

The United States requests to re-review this proposal at least four weeks before CEO endorsement to allow UNDP provide additional clarity as to what the global environmental benefits will be generated from funding this proposal. Additionally, we urge the UNDP to consider the following technical comments:

- This proposal focuses too much on the commercialization and development genetic resources as opposed to the conservation of biological diversity. We recommend that this proposal be revised and the global environmental benefits be more clearly explained. We note that the Nagoya Protocol is intended to share benefits from utilization of genetic resources in order to . . . "contribute to the conservation of

biological diversity and the sustainable use of its components" (Objective 1 of NP). It is not intended to help develop bioprospecting business and markets, nor is the GEF meant to provide funding to help support bioprospecting businesses. Some areas of this proposal seems to expand the Nagoya Protocol's mandate by applying ABS regimes to commodities, not genetic resources. (e.g., references to food flavorings and oils on page 6, production of honey described in page 14).

- The proposal should make clear its definition of indigenous biological/genetic resources and explain why its characterization of bioprospecting only includes these resources. The Nagoya Protocol covers genetic resources and traditional knowledge associated with genetic resources; it does not distinguish "indigenous biological/genetic resources". The United States also questions the global environment benefit of "bioprospecting" and therefore the applicability of this proposal to the GEF mandate.
- One of the species included in this proposal is identified as critically endangered and extinct in one region. We recommend that the proposal clarify how the project (and the bioprospecting of the species) will help protect this species instead of leading to overharvesting and further threat to the species.
- We question the appropriateness of including honey as an end product of the value chain development for *Moringa oleifera*, as honey is a commodity and not a genetic resource.
- We question the reference to this proposal targeting capacity building to facilitate ratification and entry into force of the Nagoya in section calls "link to GEF focal area strategy" on page 17. South Africa has already ratified the Nagoya Protocol, which has already entered into force, so it is unclear how this proposal will support that process.
- The "global benefits" identified on page 21 are unclear, and do not seem to track with the rest of the proposal. For example, there is only one other reference to harvesting guidelines in the document, so it is unclear if this is a major focus of the proposal. Further, it is not clear how this proposal will reverse "threats to genetic integrity" or "ecosystem symbiosis". We recommend that these concepts and processes be clarified, defined, and expanded upon before this proposal is accepted. For example, the concept of "ecosystem symbiosis" is not a common one, and we recommend that drafters clearly explain what it is and how their proposal helps protect it.

5. Turkey - Addressing Invasive Alien Species Threats at Key Marine Biodiversity Areas – UNDP - GEF ID = 9233

✓ Germany's Comments

- Germany approves this PIF.

✓ USA's Comments

- The United States supports the proposed project, which will help integrate Turkey into larger, regional efforts to reduce the spread and mitigate impacts of invasive species. As the proposal is further developed, we request that UNDP reflect on the recommendations made by the STAP with the further suggestion that it add more background on feasibility or lessons learned from similar efforts in nearby regions.

CHEMICALS AND WASTE

6. Regional (Cameroon, Republic of Congo, Central African Republic, Kenya, Swaziland, Uganda, Zambia, and Zimbabwe): - Regional project on the Development of National Action Plans for the Artisanal and Small Scale Gold Mining in Africa– UNEP - GEF ID = 9276

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany appreciates the projects objective to develop National Action Plans to reduce the use of mercury and mercury compounds in, and the emissions and releases to the environment of mercury from, artisanal and small-scale gold mining.

- Germany suggests strengthening the Knowledge management approach of the project which is currently not sufficiently described. It should be further clarified how the Africa Institute will assure the dissemination of the results and tools developed under the project.
- Component 1: Germany recommends that the final regional workshop should be opened to other interested parties and regional focal points for an extended knowledge sharing. The Minamata Interim Secretariat should assure the according knowledge management.

✓ Japan's Comments

- It should be clarified, how the National Action Plan (NAP) would be developed in the countries, especially in Central Africa. It seems difficult to establish the NAP for Artisanal and Small-Scale Gold Mining (ASGM), while a large part of the natural resource burial area is virtually under control of armed groups.

✓ USA's Comments

- The United States, in light of its policies for certain development projects, registered an opposition to this proposal. Nonetheless, the United States welcomes the efforts that will be supported by this GEF investment to avert environmental damage from artisanal and small-scale gold mining in these African countries. We are pleased that

the countries participating have declared their “more than insignificant” ASGM status. As the proposal is further developed, UNEP may: (1) re-consider the appropriate balance of funding between tasks 3 and 4 (where more resources may be needed for task 4); and (2) update the status of ASGM NAP guidance that was provisionally adopted at INC7.

7. Belarus - GEF-6 POPs Legacy and Sustainable Chemicals Management - UNDP - GEF ID = 8017

✓ **Germany’s Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany welcomes the project proposal which aims at eliminating retained POPOs legacies and development of sustainable POPs management capacity within a sound chemicals framework.

- Germany would like to note that the co-financing amount brought in by remaining PCB holders (component 1) seem exceptionally high. The incremental cost reasoning and financing should consider risks involved if this funding would cease and the likelihood of such a scenario happening. The comprehensive site evaluation and risk assessment before remediation, as described in outcome 2.2 (Component 2), seems a sensible approach to be more efficient and cost effective. Yet, the mentioned on-site active or passive treatments should be further specified and their practicability should be demonstrated as to avoid unanticipated higher costs or failure when performing the treatments.

✓ **USA’s Comments**

- The United States, in light of its policies for certain development projects, registered an abstention to this proposal. Even so, the proposed project which seeks to promote protection of health and environment through elimination of retained POPs legacies and development of sustainable POPs management capacity within a sound chemicals management framework in the Republic of Belarus, is consistent with prior investments – and with the criteria outlined by the conventions. We encourage UNDP to respond to the STAPs comments.

8. China - Capacity Strengthening For Implementation of Minamata Convention on Mercury - World Bank - GEF ID = 9240

✓ **Germany’s Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Germany seeks specification on the envisaged co-financing, especially with regard to the co-financing amount brought in by the national and local government which is not further specified and seems to be insufficient. The relatively low contribution of the Chinese government cannot be justified due to the magnitude and urgency of the pressing Hg-issue in the Chinese economy.
- Germany strongly recommends strengthening the project proposal. The PID needs further elaboration, the Concept Description is only preliminary and the description of Outputs and Outcomes needs to be further specified. The description of envisaged activities should be added.
- The expression of a clear political will of the Chinese government is missing and there is no indication which Executing Agencies will be involved.

✓ **Japan's Comments**

- Japan recognizes the importance of this project, but would like to clarify the reason for its co-financing share (currently 1:1) –this appears to be low compared to a standard GEF project.

✓ **USA's Comments**

The United States, in light of its policies for certain development projects, registered an abstention to this proposal. Additionally, we note that the proposal is not very detailed and thus was difficult to evaluate. Even so, if this proposal is properly executed, it could be very useful for China's implementation of the Minamata Convention. If it is successfully linked to legislative and regulatory changes, it could result in substantial improvements in information and reduced risk from mercury contamination. As the proposal is further developed, we request that WB reflect on the recommendations provided by the STAP, and consider our comments below:

- The proposal should provide a significantly greater level of detail, including specificity of tasks to be undertaken, the direct relation of project activities to Convention requirements, links to previous related GEF projects (including the GEF/UNIDO VCM project), the sectors in which the activities will be carried out, and how this proposal will account for risk mitigation;
- The proposal should clearly articulate how the strategy will result in the institutional changes needed to obtain environmental benefits. It should make clear who within the government would be developing the strategy and how the strategy and recommendations will be integrated into a legislative and regulatory framework in a way that will produce tangible results;

- The discussion of “human exposure at selected mines” should take into account the existing information that has already been developed on this subject;
- The level of co-financing seems low – and should be increased over time to be consistent with the GEF co-financing guidelines;.

9. Ecuador - National Program for the Environmental Sound Management and Live Cycle Management of Chemical Substances - UNDP - GEF ID = 9203

✓ **Germany’s Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany supports the adoption of an environmental sound management and life cycle management of chemical substances in Ecuador as envisaged in the project proposal.

- Due to the size and extent of this chemicals and waste programme it seems important to show how all components are aligned to reach the goal of establishing a life cycle management for chemicals in Ecuador. The project proposal would benefit from demonstrating more clearly how components 2 and 3 help to achieve component 1. It is not sufficiently described how the Life Cycle Assessment (LCA) is part of each component.
- Component 1: When developing the methodology under outcome 1.2.1, lessons learnt from previous projects should be considered as well as other already developed tools (e.g. European Platform on Life Cycle Assessment).
- All components are marked as technical assistance while GEF is looking for investment components. Against this background it would be recommendable to consider which component could become an investment component.

✓ **USA’s Comments**

- The United States supports the proposed project. As the proposal is further developed, we request that UNDP reflects on the recommendations provided by the STAP. We also recommend that the proposal further define and integrate additional elements of non-ASGM priority sector work and provide more information on the relative priority and resource allocation of the potential areas identified for institutional capacity building.

10. Jordan - Reduction and Elimination of POPs and Other Chemical Releases through Implementation of Environmentally Sound Management of E-Waste, Healthcare Waste and Priority U-POPs Release Sources Associated with General Waste Management Activities - UNDP - GEF ID = 9189

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany acknowledges the reduction and elimination of POPs and other chemical releases through implementation of environmentally sound management of E-Waste, healthcare waste and priority U-POPs release sources associated with general waste management activities:

- Under component 1 the project includes as one risk mitigation strategy a producer pay system with direct incentives and awareness/training initiatives. Germany suggests that the project proposal outlines what kind of incentives are considered to prevent the social displacement of the informal sector.
- Within the knowledge management approach for the project, it is not clear what kind of user-friendly form will be used and how the experience could be shared in detail in a systematic way. Germany hence recommends to define adequate outputs of component 4: project evaluation and monitoring in more detail.
- The information on the financing type for component 3 in the indicative project description summary table is missing and should be completed.

✓ *USA's Comments*

- The United States supports the proposed project. As the proposal is further developed, we request that UNDP reflects on the recommendations provided by the STAP. We also recommend that Output 3.1.4 on national energy from waste management capability through utilization of waste derived fuel in commercial cement kilns also address Minamata Convention requirements related to emissions from cement kilns and ensure that convention requirements are met in the sector.

11. Mexico - Environmentally Sound Management and Destruction of PCBs in Mexico: Second Phase - UNDP - GEF ID = 9214

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the clearly outlined project proposal which aims at minimizing the risk of exposure from PCBs to humans and the environment, while promoting Mexico's timely compliance with the Stockholm Convention requirements for PCB management, including Convention decommissioning and destruction provisions.

- Since the enforcement of the PCB disposal law is identified as a medium to high rated risk, Germany suggests including enforcement capacities in the project proposal.
- Component 2: It remains unclear on how the existing decontamination and destruction facilities will be upgraded. Germany seeks more detailed information on the planned activities and steps.

✓ **USA's Comments**

The United States supports this project. As the proposal is further developed, we request that UNDP reflects on the recommendations provided by the STAP and our comments below:

- The proposal should provide additional detail on the current status of PCB destruction, including whether previous underutilization of existing PCB destruction facilities represents a barrier to project success, the status of existing PCB inventories, and the status of Standard 133.
- The proposal should clarify the expectations for the envisioned public-private partnership, including the incentives for private industry to participate.
- The proposal would benefit from discussion of expected project follow-ons, including the potential for regional follow-on activity and how lessons learned will be shared.

12. Nigeria - Environmentally Sound Management and Disposal of PCBs - UNDP - GEF ID = 9236

✓ **Germany's Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany welcomes the projects overall objective to reduce Nigeria's population exposure to PCB effects and associated risks.

- As described in component 1, the adoption and enforcement of a PCB regulation has not been successfully implemented during previous projects. Germany strongly recommends that the reasons for the earlier challenges in the implementation are outlined in the project proposals and that the proposal demonstrates clearly how these risks will be managed in the current project. Germany strongly recommends that the lessons learned and experience previously made will be taken into account in the formulation and implementation of the final project. The current proposal would

benefit from showing how the civil society will be involved and which awareness raising initiatives can be adopted to specifically educate women.

13. Thailand - Greening the Scrap Metal Value Chain through Promotion of BAT/BEP to Reduce U-POPs Releases from Recycling Facilities - UNIDO - GEF ID = 9222

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany appreciates the project's approach to promote and introduce BAT/BEP measures in the scrap metal recycling facilities in order to reduce or eliminate unintentional POP releases.

- Component 2: Since the project will support the implementation of a well-organized scrap metal recycling chain, the project proposal would benefit from stating the in-depth assessment as well as further activity steps more accurately. Also, the indicated risk mitigation strategy to involve stakeholders should be described more precisely.
- Germany strongly recommends to describe in detail what kind of industry associations, NGOs, academic and research institutions will be involved in the implementation of the project and to designate the principle stakeholders.
- As the alignment with National Priorities is described as fully consistent, the corresponding check box should be marked.

CLIMATE CHNAGE

14. India - Grid-Connected Rooftop Solar PV Program - World Bank- GEF ID = 9249

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the Government of India's ambitious goal of "providing uninterrupted power for all homes, industrial and commercial establishments, and adequate power for farmers by 2022 through its *24X7 Power for All* program" as outlined in the Program-for-Results Information Document. With regard to renewables, the GOI aims to install "100GW of solar power by 2022 - a 30- fold increase from 3.4GW in early 2015. This includes an official target of installing 40GW of grid connected rooftop solar PV (GRP) by 2022."

- Germany supports the targets and ambition set forth by the GOI. While the document

describes clearly the problem facing India's energy sector, as well as its goals for innovating and improving, it is not clear what the role of the GEF Funding will be. GEF is only mentioned as a possible source of funding in the proposed second component on institutional support and technical assistance, which then raises the question of how the project will measure the incremental cost and environmental benefits of the GEF funds.

✓ USA's Comments

- The United States welcomes the proposed GEF concept for the Grid Connected Rooftop Solar PV program (GRPV Program), which aims to install up to 750 MW of solar PV on rooftops throughout India. We support the notion raised by the STAP that one of the major challenges faced by this project is how to scale up the GRPV program. We note that the U.S.-India Clean Energy Finance Task Force is collaborating on a credit enhanced warehousing facility for small renewables, including solar rooftops and that this process will uncover and help overcome systemic barriers blocking deployment and leveraging of public resources to attract private capital support clean energy projects like the GRPV Program. We therefore encourage the WB, as it develops this proposal, to reach out to the U.S. Department of State to see if any of the lessons learned from the U.S-India Cleaner Energy Finance Task Force may helpfully inform the approach to addressing policies and regulations, along with a variety of other factors that may impact project design.

15. Tonga - Outer Island Renewable Energy Project - ADB - GEF ID = 9355

✓ Canada's Comments

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the project to expand access to Solar PV throughout the island chain of Tonga. The project proposal is well formulated, addresses a specific and urgent need to provide clean, reliable, and affordable energy in a geographically challenging context. Solar power offers needed opportunities to avoid fossil fuel imports for diesel generators and employment potential for system operation and maintenance.

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

- Given the focus on operations and maintenance, it would be helpful to add information about where the hardware will be sourced, information about the supply chain for spare parts and how technical support could be administered in such a remote part of the world.

INTERNATIONAL WATERS

16. Regional (Egypt, Libya, Sudan, Chad) - Enabling Implementation of the Regional SAP for the Rational and Equitable Management of the Nubian Sandstone Aquifer System (NSAS) - UNDP - GEF ID = 9165

✓ USA's Comments

The United States, in light of its policies for certain development projects, registered an opposition to this proposal. Nonetheless, we see strong merits in supporting regional collaboration on the transboundary Nubian sandstone aquifer. As the proposal is further developed, UNDP should respond to the STAP comments and may reflect on our technical comments:

- The proposal should make more explicit what global environmental benefits and MEA targets are being addressed by the project;
- The proposal should provide greater detail on how Component 2 will “address the SAP priorities to strengthen national and regional capacities on water resource and ecosystem management and assist in increasing awareness within the wider stakeholder groups (including the indigenous population) on ecosystem management and protection,” and how the outcome on training will be made sustainable.

17. Regional (Guinea, Liberia, Sierra Leone) - West Africa Regional Fisheries Program, Additional Financing - World Bank - GEF ID = 9360

✓ USA's Comments

- The United States is very supportive of this proposed project, which will build off the ongoing World Bank West Africa Regional Fisheries Program (WARFP). The WARFP has demonstrated positive results towards establishing and improving sustainable fisheries in the region, in particular continuing to improve governance and sustainable fisheries management. We are hopeful that such efforts will continue to be productive, and that in the full project proposal the “additionality” of GEF financing is made clear.

LAND DEGRADATION

18. Global - Land Degradation Neutrality Target Setting Project - IUCN - GEF ID =9365

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany supports this global project which aims at supporting/ enabling countries to establish national voluntary targets for Land Degradation Neutrality (LDN).

- With regard to the identification of measures associated with national Land Degradation Neutrality (LDN) targeting, the proposal would benefit from being more explicit about the scope of this deliverable. Germany would recommend that the content of “measures” goes beyond priority areas/zones (para 15) or general opportunities (para 16), but reflects identified opportunities by sector and explicitly outlines the identified linkages to on-going policy development processes (enabling and regulative environment) as well as on-going investment programmes.

✓ **USA’s Comments**

- The United States welcomes the proposed concept. As the proposal is further developed, we request that UNDP provide additional detail on how this project will differ from the previous pilot project to develop Land Degradation Neutrality targets in fourteen countries and how funding will be allocated among project activities and across the three target countries.

MULTI FOCAL AREA

19. Regional (Cambodia, Lao PDR, Myanmar) - Sustainable Management of Peatland Ecosystems in Mekong Countries - IUCN - GEF ID = 9232

✓ **Germany’s Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

- Germany considers it very important to take governance aspects into account when envisaging improving the sustainable management of peatland ecosystems in the Mekong Region. An assessment of current land tenure and governance should be taken into account to be able to identify appropriate conservation measures.
- It should be considered to focus on unprotected peatlands in Laos since the Beung Kiat Ngong wetlands are already receiving considerable donor support.

✓ **USA’s Comments**

The United States welcomes this IUCN proposal, which is geared towards addressing a significant gap in the sustainable management of Peatland Ecosystems with interventions

in the Mekong Region. As this proposal is further developed, we request that the ICUN take into account the STAP recommendations, along with several comments below:

- The project developer may consider conducting a comprehensive assessment of peatland values, including economic opportunity costs of peatland conservation, community livelihoods and ecosystem benefits. In the absence of financial incentives to maintain and sustainably manage peatland forests, higher profitability can be gained by conversion to non-sustainable commercial land uses such as logging, fertilizer production, palm oil plantation.
- To pursue the zero-deforestation supply chain approach pilot suggested by STAP, the project developers may consider investigating key stakeholders and policies to link them with the project targets on establishing institutional and financing mechanism for peatland management. Ideally the private sector, a critical peatland conversion driver, should be involved in the participation processes since the beginning to increase the likelihood of accessing sustainable finance at the project end.
- The project could consider a risk on ‘Limited land use monitoring capacities’ of target countries. The risk could be mitigated by science and technology, which will be useful for improving peatland baseline data and monitoring areas of conservation improvement. They could also benefit from the real-time Land Cover Monitoring System to be developed by SERVIR Mekong.
- Prior U.S. experience suggests that more meaningful stakeholder participation in peatland management and conservation is a key element that needs serious attention in Myanmar, Cambodia and Laos, particularly when project developers mobilize multi-stakeholder processes aimed at developing and implementing policies and measures to address climate change, high carbon sequestration and drivers of deforestation and degradation. We therefore suggest that IUCN build on the current success of decision Support Tool Identifying and Addressing Drivers of Deforestation and Forest Degradation developed by ASEAN Regional Knowledge Network on Forest and Climate Change (ARKN-FCC) in collaboration with [USAID LEAF](#).

20. Regional (Guatemala, Honduras) - Integrated Environmental Management of the Rio Motagua Watershed– UNDP - GEF ID = 9246

✓ Germany’s Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany generally agrees with the proposal, welcomes the envisaged synergies with activities implemented with funding from the German government and supports the suggestions for improvement made by STAP.

- Germany especially supports the STAP suggestion to include groundwater together with surface water issues in the diagnostic analysis, because of the concerns about pollution from POPs and other contaminants.

- The institutional arrangements for waste management along both sides of river Motagua should be taken into account more explicitly in the further development of the proposal as a basic precondition for sustainability of project outcomes.
- In project component 3 (Innovative pilot initiatives) Germany suggests to assess the possibility of increasing the targets for project outcome 3.4.1 Rehabilitation (conservation and protection, reforestation, natural regeneration, remediation).

✓ USA's Comments

21. Afghanistan- Community-based Sustainable Land and Forest Management in Afghanistan) – FAO - GEF ID = 9285

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- The expected co-finance of US\$ 35.000.000 to be provided by the Government of Afghanistan seems to be very high.
- The project document therefore should be more explicit on the budgetary origin and the proportion of expected in-kind and financial contributions. Germany strongly recommends considering an alternative implementation scenario that would secure feasibility even in case of only moderate contributions of the host government.

✓ USA's Comments

- The United States is supportive of the proposed GEF concept and appreciates the strong emphasis on stakeholder engagement and a strong participatory process. Prior to CEO endorsement, we encourage the FAO to responding to the STAP recommendations and to elaborate and expand upon risk mitigation as the concept is further developed into a full project proposal.

22. Bolivia - Sixth Operational Phase of the GEF Small Grants Programme in Bolivia - UNDP - GEF ID = 9248

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

Germany welcomes the 6th operational phase of the GEF Small Grants Programme which has been successfully running in Bolivia for many years. Germany welcomes that an additional focus proposed in the PIF includes support for the development of landscape strategies and the implementation of landscape management plans.

- To implement these plans it is important to involve all relevant stakeholders. However, it is not clear who of the stakeholders will have the leading role in the development of these strategies and plans. In the past the implementation of these kinds of plans has often failed for that same reason. Germany therefore highly recommends involving the local and regional municipality and departmental governments as well as the administration of the Natural Parks and Natural Areas for Integrated Management in all stages and activities. Furthermore, it is recommended to interrelate it with/in the development plans of the municipalities and their area planning. The communities need to be strengthened to demand the integration of activities in the annual operational plans of the municipalities.
- Germany appreciates the project outcomes on strengthening local governance (1.1) as well as increasing the organizational skills of community and local civil society organizations (2.1). However in the extended project description the elaboration on these topics is very limited, the focus is on the development of technical skills, and the elaboration and dissemination of best practices and research results. Germany asks to elaborate more on how the capacities of different local stakeholders will be strengthened.
- The relatively high amount of co-financing (grants and in-kind) by local governments (municipalities) as well as CSOs is surprising, especially as the budget of the municipalities has decreased drastically in recent years. In the PIF neither the number and names nor the role of the municipalities within this project are elaborated on. Germany therefore asks to specify the role of the local governments.
- Germany appreciates that the PIF seeks to foster synergies with interventions of other development cooperations, e.g. Biocultura (COSUDE). The German development cooperation has pilot projects that, even if they are not located in the project areas, have objectives that are very compatible. Therefore, Germany suggests to seek cooperation with the following programs of the German development cooperation, implemented by GIZ:
 - PROBOSQUE especially with regard to the policy and innovation platforms as well as forestry
 - AIRAD (Support of the implementation of the autonomous regime) with regard to sub-regional planification processes
 - ENDEV Bolivia (Energising Development Bolivia) with regard to the topic of improving energy efficiency and renewable energy.
- Germany suggests to consider the newly published Plan for Economic and Social Development (Plan de Desarrollo Economico y Social) 2016-2020 as part of the National Priorities.

23. Cameroon: Integrated Sustainable Urban Development (SUDP) and Environmentally Sound Management of Municipal Solid Waste Project in Cameroon - AfDB - GEF ID = 9234

✓ **Germany's Comments**

Germany has objections against the following PIFs in their current form and requests that certain requirements are fulfilled before PIF approval:

Germany welcomes that climate change is being taken up in the context of urban planning in Cameroon, where the demographic changes, rapid urbanization and unsustainable settlement practices are placing the population at risk and contributing to environmental decay and avoidable GHG emissions. Issues of waste management, sustainable transport and safe settlements are certainly at the heart of Cameroon's urban development challenges.

- However, the proposal as it stands could benefit from a more coherent and concrete description of project priorities, proposed activities and outcomes. The STAP comments are very helpful in terms of making concrete suggestions for improving technical aspects of the proposal. In addition, Germany recommends revisiting the objective of the proposed project and restructuring the components to clearly state how project priorities will be addressed in an "integrated" way.
- Current wording is often vague and the resolution of challenges (i.e. at-risk population in the face of floods and climate change) does not seem to always be reflected in the proposed actions. For instance it remains unclear whether the project will support the development of specific national-level environmental directives, which will subsequently need to be implemented and monitored at the city level. ("The focus within this urban planning and management program will be to identify the most appropriate and feasible entry points to create good urban planning policies which are applicable at the national level as part of a larger sustainable development program, but be specified at the local level, focusing on sustainable integrated land use and urban planning as a key pillar around which broader urban planning activities will be centered.")
- In general, the proposal would benefit from a more structured description of its components and a more coherent description of specific activities to be implemented in support of project priorities (e.g. waste management, reduced GHGs, and improved urban transport).

✓ **USA's Comments**

- The United States supports the objectives of this GEF concept, which will address the root causes of critical urban environmental issues in Yaounde at the systems level through integrated and environmentally sound urban management practices. The United States expresses support to the STAP recommendations to help the AfDB further strengthen the project prior to CEO Endorsement. Additionally, if possible, we welcome additional discussion in the full proposal for how risks to project

implementation will be mitigated and how this proposal will build on or enhance other related investments in Cameroon being undertaken by other institutions.

24. Ecuador - Implementation of the Strategic Plan of Ecuador Mainland Marine and Coastal Protected Areas Network - CI- GEF ID = 9369

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

- Germany requests incorporating in the final project design, a stronger focus on incentives and benefits for the local population and communities within Component 1 as well as within Component 3 (71c). This focus is needed to achieve strong community support for conservation objectives with protected areas in implementation as for example Sociobosque/ SocioManglar.
- The potential for economic initiatives related to the sustainable use of mangroves should be explored, considering also the role the private sector can play in this respect. Methodically the TEEB approach could provide appropriate guidance.
- The PIF makes reference to co-financing from the Ministry of Environment in several points (Table in part C, points 10, 34, 58, 87). Points 29 and 30 (Barrier 7) rightly mention that government funding to protected areas will be reduced in the future. Germany requests that the Sustainability strategy (85-88) be explained more explicitly under the current Ecuadorean government's co-financing limitations. It also suggests including financial limitations and narco-trafficking in the risk table
- Germany requests that the pollution concerns mentioned in points 15 and 33 be addressed in the project proposal, especially in Components 1 and 2.
- Under Part 5 Germany recommends adding the benefits an MPA network can provide for adapting to climate change impacts as well as for the sequestration of blue carbon.
- In terms of cooperation with German Development Cooperation, synergies with the ongoing programme on Biodiversity and Climate Change (ProCamBío MAE-GIZ) and with the programme on protected areas (SNAP) should be explored (107).

✓ USA's Comments

The United States is supportive of this very strong proposed concept, which will help lead to global environmental benefits relating to the treatment of coastal protected areas. As the proposal is further developed, we request that CI reflect on the recommendations provided by the STAP and our comments below:

- The proposal may be strengthened through greater consideration of public support and stakeholder engagement. What other local or regional CSOs are operating in the

area? Women's cooperatives?

- Building social networks may be necessary to maintain the ecological MPA networks that will be strongly emphasized as a part of this project. For this reason, adding in person components and strengthening the capacity building effort could be helpful. For example, doing in person instead of video trainings provides an opportunity to bring together the MPA leads to learn from each other and build their network.
- Addressing climate adaptation goals and resilience would strengthen the project and better ensure sustainability of efforts.
- A stronger elaboration and focus on creative collaborative management and engagement strategies rather than primarily enforcement would strengthen the project. Considering hotels and other tourism facilities would be beneficial. Are there successful models of sustainable tourism projects in the area that can be involved to help scale up models in this project? What type of tourism policy needs to be developed? Enforcement? Coastal development for tourism guidelines? Required infrastructure to support tourism (solid waste and waste water disposal and treatment for example? Use of local employees and materials? Also there are notations of guidelines (output 1.1.6) that are not listed.

25. Guatemala - Promoting Sustainable and Resilient Landscapes in the Central Volcanic Chain– UNEP - GEF ID = 9059

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany requests that the following requirements are taken into account during the design of the final project proposal:

- Since October 2013, the Climate Change Framework Legislation exists (Decreto 07-2013). Articles 15c and 15d together with Art. 17 determine the cooperation and responsibilities between the various government institutions. The full proposal should reflect the legal requirements set by the Framework Legislation and how the project contributes to its objectives.
- As regards the Payment for Watershed Services, the full proposal should clearly identify how the water-users, communities and municipalities will structure their cooperation under Component 1. The proposal needs to specify clearly the flow of funds, the transparency and conditions of payments for services. The municipalities are obliged by municipal law (e.g. Articles 35a, 142, 143 of the Municipal Code, Decreto 12-2002) with certain tasks that affect directly the use and payment of water services. Germany strongly recommends that the full proposal seriously considers the existing legal regulations in order to establish a functioning and legally backed PWS.
- Germany considers it important that the full proposal considers current projects and programs of other donor organisation and indicates areas of cooperation. GIZ for

instance (Program ADÁPTATE II) is active in the project area (San Marcos, Quetzaltenango, Sololá) working together with ANACAFÉ and MAGA on aspects of organic coffee farming in the context of adaptation to climate change. The EU regional Program PROCAGICA, implemented by GIZ, will also promote organic coffee farming in the region.

- Since the government has changed in January 2016, a confirmation of the allocation of funds by the new government should be sought, especially regarding the Ministry of Environment and Natural Resources (MARN) whose financial resources have been cut for 2016 and only serve to maintain operations.

26. Kazakhstan : Conservation and Sustainable Management of Key Globally Important Ecosystems for Multiple Benefits - UNDP - GEF ID = 9193

✓ Germany's Comments

Germany has objections against the following PIFs in their current form and requests that certain requirements are fulfilled before PIF approval:

Germany has objections against the PIF in its current form and will only be able to approve the PIF after some of the following changes have been made:

- As the co-financing both by CSO and the state seems highly unrealistic, inter alia due to the current economic situation in KAZ, and the status of mentioned state programs is unclear (new phase of Zhasyl Damu program has not been confirmed, the availability of funds envisaged by the Strategic Plan of the Ministry of Agriculture for 2014-2018 is unclear and the Strategy for Protected Areas System Expansion until 2030 became inoperative in 2010), Germany requests that the final proposal realistically assesses the co-financing and cooperation potentials and reflect these accordingly.
- The project addresses very different ecosystems, spread over a large geographic area, partly poorly defined in geographic terms. Intervention areas should be clearly defined and conservation values, threats and expected project impact be clearly geographically linked. As the Snow Leopard (SL) only inhabits mountain grasslands the PIF's link to the parent program is unclear, please provide further clarity. Germany hence suggests that there should be either a focus only on mountain ecosystems or the focus on SL should be given up.
- Section A.1.1 contains factual errors and misinterpretations that affect the justification of the project based on global environmental values (esp. the status of threatened species). Some "indicator species" are generalists that are not suitable for measuring project impact. Germany strongly recommends to review this section thoroughly for factual errors and to adjust it accordingly.
- The PIF describes the insufficiencies of PA management and enforcement, but the aimed increase of area coverage would exacerbate this problem. Assumptions about

unsustainable legal hunting quotas are poorly justified, while actual and potential benefits of well-regulated hunting are not mentioned. Serious conflicts (e.g. between forest users and PAs in the Altai region) are not mentioned. Private financing bears the risk of exploitation through influential and wealthy groups. These factors can lead to the alienation of current land users, and the reassignment of land-use rights to third parties. The viability of intended PA expansion and the associated risks for conservation and livelihoods need to be carefully assessed.

- The conservation of ungulates through sustainable hunting and the inclusion of forest users are only vaguely addressed in the PIF and the direct involvement of local communities in the management and use of game species as well as the illegal trade in Saxaul is not mentioned at all. In line with the STAP review, we recommend adopting and adapting “a well-tested approach, such as the Namibian CBNRM initiative”, including pilot projects for community-based wildlife management based on experiences by GIZ and Panthera in Kyrgyzstan, Tajikistan and Pakistan.
- Germany seeks clarification on how planned activities will lead to intended project impacts, especially regarding how the valuation and integration of ecosystem services will be included in decision making and how the development of land use plans translates into sustainable pasture management.
- The actual situation regarding the Green Economy process in KAZ should be reflected in the proposal and there should be cooperation with sectorial agencies responsible for infrastructure to reduce threats for species.
- Using DNA markers for the SL monitoring program by at least 4 research institutions and 1 laboratory is unrealistic given the technical requirements and costs and comparably small population of the species in the country. Germany strongly suggests to consider collaborating with established and experienced foreign research institutions instead, which would far more realistically allow for technical quality and cost efficiency.

✓ **USA’s Comments**

The United States is very supportive of this project, which primarily aims to stabilize and recover the snow leopard population in Kazakhstan (and throughout its range). The landscape approach described in the proposal has the potential to provide habitat and protection for a wide range of species beyond the snow leopard, and, if successful, its scale could make it a good example for replication elsewhere. As this proposal is further developed, we recommend the UNDP take the helpful input from the STAP into account, along with our technical comments:

- Although the scientific and data-related risks are described in the proposal and adequate mitigation measures are included, there is limited discussion about how the proposed project would address conflicts among a number of policies that guide wildlife habitat management and other economic activities (e.g., tourism, forest harvest, or other pressures prioritized over snow leopard habitat protection). Similarly, there is no discussion of the risk and mitigation actions related to private entities (e.g., local communities who rely on existing firewood collection practices).

We recommend these are further explored and incorporated into the full project proposal.

- The PIF mentions that tourism and associated government policies are a driver of snow leopard habitat loss and population decline. However, the appropriate government body (e.g., ministry) is not clearly included in the proposal. Further, there is not a consideration of how current community practices may contribute to habitat loss and degradation and how these may be addressed (e.g., how households replace firewood that is currently gathered from forests close to villages?) There is also limited discussion of how existing policies that conflict with habitat conservation will be addressed. The framework (i.e., landscape planning, updated monitoring and patrolling approaches) is suitable to address other ecosystems or species, but there is no discussion of options for where this approach could be replicated elsewhere.
- We recommend that: (1) the contributions of this project to specific Aichi targets be made more explicit and (2) risks associated with climate change be included.

27. Madagascar - Sustainable Agriculture Landscape Project – World Bank - GEF ID = 9330

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

- Germany recommends that the project clearly outlines how sustainable agriculture and sustainable forest management can be interlinked through the landscape approach in the selected regions so that agriculture is not a driver of deforestation (in general few SFM activities included). Furthermore, the proposal should demonstrate how in particular the local communities can be integrated into the project activities since the landscape approach is a participative approach. On-going environmental governance developments and synergies with other sectors (land tenure policy reform, energy reform to restore 40.000 ha/year, high corruption rate) and activities at the landscape level (Madagascar (MEEMF) pledged to restore 4 mio ha until 2030 under the NEPAD, BMZ, WRI initiative “African Forest Landscape Restoration 100” AFR 100) should be considered.
- In component 1.1, the project should make sure that the activities are coherent with other existing regional land use plans (SAC/SRAT).

✓ USA's Comments

The United States supports this set of projects, which articulate clear and measurable goals (increased yields, areas treated for improved irrigation, acres of forest brought under forest management plans, etc.) critical to agricultural sustainability. As the proposal is further developed, we request that WB reflects on the recommendations

provided by the STAP and our comments below:

- We recommend explicit statements as to how the proposed activities will meet each of the Aichi targets to evaluate whether they are appropriately aligned;
- The full project proposal may more clearly articulate how the identified lessons learned from similar programs in the past will be applied. In particular, there more details may be provided in the areas of community participation and engagement of national and local government entities.
- The project should take measures to ensure that intensification is achieved in a sustainable way that protects the local environment and waterways.

28. Mexico - Sixth Operational Phase of the GEF Small Grants Programme in Mexico - UNDP - GEF ID = 9167

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

- Germany acknowledges the Small Grants Programme in Mexico and considers the planned activities very reasonable, especially in case they account for the strengthening of civil society. In general, Germany notices that the coordination for the Mesoamerican corridor in Conabio is only marginally addressed and that it could be strengthened.

29. Myanmar - Rural Productivity and Ecosystems Services Enhanced in Central Dry Zone Forest Reserves - ADB - GEF ID = 9267

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

The project will be implemented at a time with opportunities for shaping the countries future development path. The project can contribute meaningfully to the review and re-shaping of policies to achieve mainstreaming biodiversity and ecosystem services into sectoral policies like water and land use. It is noted favorably that the project seeks to connect with ADB projects targeting the improvement of infrastructure. In order to strengthen this aspect of the proposal Germany suggests that:

- The budgets allocated to the four components are revisited. Component 2 and 4 foresee the development of arguments on why and how to better integrate biodiversity and ecosystem services into sector policies and into the overall policy process. However, budgets for the two components are very low given the scope of the task,

which entails the risk that very few activities will be conducted, especially in the capacity building realm.

- In order to mainstream biodiversity and ecosystem services, targeted analysis (Component 2) is necessary. Also a good understanding of the policy process and stakeholders are essential to ensure that arguments developed and strengthened by the analysis are heard in the political arena (Component 4). Both components need capacity that has to be built during the project. Examples of how to build that capacity can be found e.g. in the work to build capacity under IPBES, the GIZ-ValuES project or the SGA-Network. Project implementers should be encouraged to reach out and connect with these initiatives where possible.

✓ *USA's Comments*

The United States is supportive of this GEF concept, which targets avoided and sequestered GHG emissions, biodiversity, and improved agricultural and forest management practices. We recommend that the ADB consider the following before GEF CEO Endorsement:

- The project may benefit from more discussion on how to sustain project activities beyond the funding life. For example, irrigation and other infrastructure will need maintenance in order to be effective in the long term. Who will be in charge of this, and how will training be administered over the life of the technology? How will education and other support be sustained?
- The project may benefit from a clear description of how the proposed activities will benefit farmers and forest workers. What will motivate them to participate? How will they receive economic benefits from the proposed activities? Can these economic benefits be estimated as part of the full project proposal?
- The project may benefit from a more detailed discussion of the goals of existing projects and how they relate to the proposed project to demonstrate additionality of the new funding such that projects are not duplicative. The project mentions a variety of other initiatives aiming to improve environmental outcomes in the region, including ongoing GEF projects, IFAD, USAID, UNDP, and others. The project may benefit from reaching out to the International Crops Research Institute for the Semi-Arid Tropics (ICRISAT). Although ICRISAT is not based in Myanmar, the organization has experience improving watershed management and agricultural livelihoods in similar countries, including India.
- The project aims to incorporate a variety of stakeholders throughout implementation, including indigenous people and women. However, the project may benefit from a more thorough description of how these stakeholders' concerns and viewpoints will be incorporated into outcomes and goals. Some questions may include: How will farmers benefit from adopting the proposed remedial actions? Improved soil health and water management will ultimately lead to improved yields, but this may initially be difficult to demonstrate. Why would farmers invest in these practices when they do not own the soil? Many of the benefits resulting in improved yields will take years to

accrue. A defined strategy of how the project will incentivize adoption is recommended.

- The project may benefit from a more thorough description of how proposed activities and benefits will be maintained in the long term. For example, the project mentions the establishment of a pilot payments for ecosystem services (PES) program. Who will administer this program, and will it be maintained if it is demonstrated that the program is successful? The scaling up of the program is likely contingent on its success with stakeholder buy-in. If stakeholder groups are actively involved and can experience demonstrated success and benefits, it is likely that the practices and proposed activities will be adopted on a broader scale.

30. Pakistan - Pakistan Snow Leopard and Ecosystem Protection Program - UNDP - GEF ID = 9231

✓ Germany's Comments

Germany has objections against the following PIFs in their current form and requests that certain requirements are fulfilled before PIF approval:

Germany has objections against the PIF in its current form and will only be able to approve the PIF after some of the following changes have been made:

Germany welcomes the ambitious proposal but requests to reassess the figures presented in the PIF concerning co-financing. The current figures are deemed unrealistic and should be reviewed.

- Germany has concerns that particularly provincial governments are in the position to co-finance the planned projects with the indicated amounts.
- Furthermore Germany suggests that component 1 landscape level approach for snow leopard conservation is further developed using a multi-stakeholder and cross-sectoral approach involving all relevant stakeholders and government departments (not just the Wildlife Departments).
- Germany also recommends clarifying interlinkages between component 1 and 2 to ensure a coherent overall approach.
- In the development of the final project proposal it should be assessed if component 3 can comprise activities to encourage alternative sources of income (other than livestock).
- Activities implemented under component 4 should take into account existing initiatives when developing GIS-based information systems in Pakistan.
- Germany further suggest that the final project proposal takes into account the information available in the regional Biodiversity and Action Plan for KP (KPBSAP) as well as the revised NBSAP and uses these strategies as orientation.

- The final project proposal should clearly address all the concerns and issues raised in the STAP review.
- Germany approves this PIF.

✓ USA's Comments

- The United States supports this project, noting that it has the support of the Snow Leopard Foundation and the Ministry of Climate Change, with substantial co-financing. We welcome the proposal's inclusion of outreach to local communities to create awareness and buy-in. As the project is developed further, we recommend that it continue to balance the twin benefits of endangered species conservation and climate-smart restoration and adaptation

31. Pakistan - Sixth Operational Phase of the GEF Small Grants Program in Pakistan - UNDP - GEF ID = 9331

✓ Germany's Comments

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

- Germany acknowledges the project's approach to refine its geographic focus on the Indus Delta and welcomes the intention under Component I to provide small grants to organizations "[...] in pursuit of strategic landscape level outcomes related to resource management for biodiversity conservation, climate change mitigation and adaptation and integrated water resources management." However, Germany notes that while the PIF contains information about climate change impacts on Pakistan as a whole, no more detailed information on climate change impacts and vulnerabilities specific to the Indus Delta are provided. **Germany recommends considering relevant vulnerabilities to climate change and projected impacts specific to the Indus Delta, to make the case for focusing on this geographic area.**
- Germany welcomes efforts to apply a "strategically designed programmatic approach to maximize the impacts and sustainability" (p. 10), in contrast to previous interventions which "in most cases [...] [remained] isolated and lack holistic impact or vision" (p. 10). **Germany encourages the implementing agency to apply appropriate methodologies to track and document the benefits of this approach over the duration of the 6th Operational Phase of the SGP.**
- Germany appreciates the project's aims to build capacities of CBOs and NGOs to address the essential problem of "organizational weaknesses of the communities living and working in affected urban and rural landscapes to act strategically and collectively in building social and ecological resilience" (p. 9). Project outcome 1.2 includes capacity building, yet the related project outputs (1.2.1-1.2.3) do not reflect specific activities for capacity building. **Germany recommends to ensure that**

capacity building, described in the PIF as “a learning-by-doing approach in which the project itself is a vehicle for acquiring practical knowledge and strengthening organizational skills” (p. 19) **is carried out during small grant projects in a way that measurably increases capacities of participating organizations.**

32. Palau - Integrating Biodiversity Safeguards and Conservation into development in Palau - UNDP - GEF ID = 9208

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

- Germany recommends that the project should go beyond biodiversity safeguards, as these are only minimum standards for avoiding risks, and look for biodiversity co-benefits wherever possible.
- Germany seeks clarification on the order of project activities which remain unclear. Germany suggests establishing clear milestones and to clarify who will be responsible for the measures and which capacity building measures would be required.
- Germany welcomes the strong focus on capacity development of key institutions and awareness raising of tourists. However, especially in order to improve agricultural practices, more public awareness raising within communities is needed.
- Germany also welcomes the establishment of a landscape planning platform for increased coordination of activities. In the proposal there seems to be a strong focus of the platform on forest-related outputs. This is understandable considering the vast extent of forest area in Palau, however, landscape planning should also include other outputs that are e.g. linked to sustainable agriculture.
- Germany seeks clarification how business plans that integrate biodiversity concerns (component I) and the generated funds shall be utilized after their development.
- Germany recommends considering the introduction of financing mechanisms such as Payment for Ecosystem Services schemes and tourist fees for visiting PAs in order to increase financial sustainability.
- Germany also suggests considering the development of incentives/disincentives for promoting adherence of tourism sector to the new standards developed under component 1 on a nation-wide scale.

✓ *USA's Comments*

- The United States recognizes the importance of strengthening biodiversity conservation in Palau's development. We concur with STAP's assessment and recommend a narrowing of the project's focus, for example to specific

implementation barriers, invasive alien species management, or land management.

33. Peru - Sustainable Management of Agro-Biodiversity and Vulnerable Ecosystems Recuperation in Peruvian Andean Regions through Globally Important Agricultural Heritage Systems GIAHS Approach - FAO - GEF ID = 9092

✓ *Germany's Comments*

- Germany approves this PIF.

✓ *USA's Comments*

- The United States concurs with STAP that the proposal is a solid one, but seems ambitious. We encourage the FAO to consider the STAP suggestions to improve the proposal.

34. Serbia - Contribution of Sustainable Forest Management to a Low Emission and Resilient Development - FAO - GEF ID = 9089

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

- In spite of carrying “resilience” in the project title, the proposed concepts and interventions are focused exclusively on mitigation when it comes to climate change. Given the high vulnerability of forests in Serbia to the consequences of climate change due to the generally bad condition of forests, dry summers and the high risk of forest fires, we strongly recommend to include adaptation to climate change into the promoted SFM concepts and into the proposed activities related to inventories, monitoring, knowledge management, stakeholder coordination and capacity building.
- Besides, the PIF is focussed on forest ecosystems within the forest boundaries without taking into account its relationships to the wider landscape (agriculture uses, watersheds, buffer zones, biomass energy production etc.). Particularly, the proposed activities targeting enhanced multi-sectoral coordination would strongly benefit from a landscape approach and we therefore recommend including it in the strategic framework of the project.

✓ *USA's Comments*

The United States supports this proposed project to promote multifunctional sustainable forest management in Serbia to conserve biodiversity, enhance and conserve carbon stocks, and secure forest ecosystem services in productive forest landscapes. We

recommend that the FAO consider the following before GEF CEO Endorsement:

- The project cost for the 1st component (\$17 million) may be too high, since the 2nd national inventory is building off of the first inventory with the addition of incorporating biodiversity and carbon stock evaluation based on existing carbon MRV systems, and directing national policy changes and coordination.
- Carbon measurement for bioenergy and forest products should be, with explanation provided on how deforestation abatement and reforestation efforts will coincide with bioenergy plans. Given that one of three barriers to management is deforestation in the form of illegal timber extraction, forest clearing due to agricultural pressures and fires, a better strategy might be to focus first on promoting forest health, a regenerative rate of growth, and higher value wood products, that can promote the forest value, and later incorporate energy markets in sustainable management. Essential to the project success will be the increase of forest area under sustainable and multi-functional forest management and guideline establishment.
- A greater share of resources should be placed on monitoring the success of plan.

35. Uzbekistan - Sustainable Management of Forests in Mountain and Valley Areas - FAO - GEF ID = 9190

✓ *Germany's Comments*

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

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

- The target of the total area on which forest management will be improved is 121,750 hectares. Although this number is calculated in detail in the table in Annex I, nonetheless it seems to be unrealistic, given the challenges of sustainable forest management in Uzbekistan. Germany recommends to review these figures on a more realistic base.
- Germany strongly recommends that the Uzbek government priority to produce medicinal and aromatic plants and its emphasis on planting species which in short time provide economic benefits to the Uzbek government, as well as to local communities, should be taken into account in the project proposal.
- The project plans to provide direct benefits for 500 households. Germany seeks clarification on whether this is an appropriate impact considering the total project cost of 13,000,000 USD, i. e. 26,000 USD per household.
- Although the project provides many other benefits for the forestry sector of Uzbekistan (components 1 and 4), the ratio costs and socio-economic impact should be reflected.

- The project proposal suggests implementing measures such as protecting existing high quality forest from illegal woodcutting and over-grazing in Ugam Chatkal National Park. The project would benefit from developing more concrete measures, e.g. valuation of ecosystem services of forest in terms of carbon sequestration or ecosystem services of pastures on state forest fund could be considered. Further, the project should be coordinated with Tashkent Region Authority which is responsible for this area.
- The table in annex 1 explains in detail how the target of sequestering 3.2 million t CO₂ will be achieved. The biggest amount will be sequestered in Ugam Chatkal National Park. It seems to be very unrealistic to expect that illegal firewood cutting and livestock grazing can be halted on the entire area (70.000 ha).
- Germany seeks clarification on the values of tC/ha/year sequestered as they appear to be very high for the given forest ecosystems or forest plantations.
- Germany recommends reviewing the basis of calculation and rendering a more realistic estimate of carbon sequestered.
- The project proposal suggests that MFD will ensure to coordinate output 2.4 (IKI project ‘ecosystem based land and forest management of the tugai habitats of Amu Darya river for improved livelihood of local communities and as adaptation strategy to climate change’). Germany suggests to establish a simple coordination mechanism between MFD, FAO and GIZ, also embracing the activities of the Regional BMZ financed Programme “Sustainable and Climate Sensitive Landuse for Economic Development in Central Asia” in Uzbekistan and the current joint GIZ-MDF project: “Development of participatory forest management model for establishment of sea-buckthorn (*Hippophae* spp.) plantations on the territory of state forest fund of the Republic of Uzbekistan”.
- Output 2.2: As the proposal suggests tree planting in agriculturally used landscapes, some of them irrigated agricultural lands with high and rapid economic returns, the opportunity costs of afforestation are very high. The proposal would benefit from providing more information on incentives that will be used to ‘motivate’ farmers to abandon their traditional modes of land use as well as to compensate farmers during the transition to full production of tree crops (e. g. pistachio: first harvest after 5-8 years and full production only after 13 years).
- Germany strongly recommends correcting the information in the project proposal regarding ongoing projects:
 - The BMZ/GIZ Programme for the sustainable use of natural resources in Central Asia will end by 04/2016. From 05/2016 the follow-up programme is called ‘Regional Programme on Sustainable and Climate-Sensitive Landuse for Economic Development in Central Asia’.
 - The EU/GIZ programme FLERMONECA has ended in 2015. There is no follow-up project.
 - There is also an UNDP Project under implementation, titled: “Reducing Pressures on Natural Resources from Competing Land Use in Non-Irrigated Arid

Mountain, Semi-Desert and Desert Landscapes of Uzbekistan” also called as LAND project, of which one of the components is related to sustainable rangeland and forestry management in target districts of Uzbekistan.

✓ **USA’s Comments**

- The United States supports the proposed project. As the proposal is further developed, we request that the FAO reflects on the recommendations provided by the STAP, notably the concerns about agricultural financial incentives and mechanisms and stakeholder preferences, as well as concerns about use of pistachios relative to other crops or trees.

NON-GRANT INSTRUMENT PROJECTS

36. Regional (Africa) - Investing in Renewable Energy Project Preparation under the Sustainable Energy Fund for Africa (SEFA)(non-grant) - AfDB - GEF ID = 9043

✓ **Germany’s Comments**

Germany approves the following PIF in the work program but asks that the following comments are taken into account:

Germany welcomes the proposal to significantly increase access to safe, clean, affordable energy in Africa through the expansion of renewable energy. Furthermore, the efforts underway to explore means for making the Project Preparation window under SEFA sustainable by piloting reimbursable grant schemes are commendable: “The ultimate objective would be to develop a more “sustainable” facility with new projects being financed with funds from successful projects.” Plans to leverage GEF funds to “strengthen SEFA’s mandate and approach to grant deployment, provide more resources to keep up with its deal-flow as well as provide a test platform for alternative utilization of grant instrument as a catalyst of change” seems like an appropriate use of GEF resources.

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

- The focus of SEFA is on facilitating small- to medium-scale renewable projects. It would be helpful however to include a definition for what they consider to be small- to medium-scale renewables. Typically a large-scale project would be anything over 10 MW. Upon looking at the pipeline of projects that have been approved, six out of 11 of the projects are to generate between 20 - 120 MW. Germany hence suggests that the proposal outlines how the SEFA plans to distinguish itself from, or add-up to, the Africa Renewable Energy Initiative, which shall focus on large-scale renewables in Africa and is not mentioned in the proposal.
- Germany suggests indicating why the project proposal excludes off-grid and geothermal technologies.

- The proposal cites the medium-to-high-credit and financing risk for renewable energy project, noting that some of the projects receiving GEF financing will likely not be finalized for reasons “outside AfDB’s control” and that in such cases, the grant money will be written off. Germany seeks clarification whether there could be a mechanism in place to trigger GEF funds once certain risky aspects of the preparation phase are completed, such as getting regulatory frameworks in place first and whether such a mechanism incentivizes greater success in overcoming some of the risks cited that are outside AfDB’s control, (eg. lack of equity, PPA not signed, expiry of provisional licenses, inconclusive feasibility studies, E&S challenges, policy and regulatory gaps, etc.)
- The proposal states that USD920 million in financing will come through the private sector, however, this is listed as “indicative.” Germany seeks more information about this figure and what indications there are showing that such a figure is realistic? Are there estimates of what the total impact would be on emissions / MW installations if so much money were indeed leveraged through the private sector?
- SEFA can play an instrumental role in promoting private investment in small-scale renewable energy projects by providing project preparation funding that will help private power developers to defray early-stage project development risk, one of the key roadblocks to more significant investment in small-scale renewables in Sub-Saharan Africa today. In that context, SEFA should also explore possible links with the GET FiT programs currently under preparation by Germany (e.g. in Zambia), specifically with a view to connecting projects receiving SEFA project preparation funding with potential financiers and providers of risk mitigation.

✓ *USA’s Comments*

The United States, in light of its policies for certain development projects, registered an opposition to this proposal, though this is a potentially valuable program – that may be able to utilize relatively small amounts of concessional financing from the GEF and the AfDB to leverage \$955 million in investment for renewable energy in Africa. As this project is further developed, the United States recommends that the AfDB take into account the input from the STAP and may wish to consider the following technical comments:

- The United States is supportive of the Non-Grant Instrument Pilot (NGI) and expects this NGI concept will have additional financial details as it is converted from a concept into a full project proposal.
- SEFA could focus on matching funds for project pre-development work to help achieve maximum investment impact. We recommend that the AfDB focus on completing the \$1-3 million project requirements for a \$75 million solar or wind project that carries a lower risk as a part of this investment – and support an exclusion for investment in geothermal energy for this particular renewable energy project. A typical geothermal project requires \$30 million for exploration and drilling for a four well project to create \$20 in steam assets, making it a sector that is still too risky for

SEFA target project developers.

37. Regional (Indonesia, Philippines) - The Meloy Fund: A Fund for Sustainable Small-scale Fisheries in SE Asia (Non-grant) - CI - GEF ID = 9370

✓ *Germany's Comments*

- Germany approves this PIF.

✓ *Japan's Comments*

- Japan International Cooperation Agency (JICA) has some projects in the field of coastal resource management in Vanuatu, Tunisia and Senegal. In order to create synergy, close coordination with those projects (JICA and GEF) is highly recommended.

(Especially JICA is interested in how to utilize loan in the GEF project)

✓ *USA's Comments*

The United States is supportive of improving fisheries management in Indonesia and the Philippines and is optimistic that investment funds may be usefully applied to address existing gaps. However, at least four weeks before CEO endorsement, we request to re-review the full project proposal to ensure that CI is able to respond to the STAP comments and better articulate: (1) The status of coral reef fisheries; (2) The socio-economic drivers that contribute to the threats they seek to address; and (3) The link between the proposed intervention and they outcomes sought. Additionally, we request that CI also consider taking steps to address the following:

- Better explain how loans to processors benefit fishermen. Small scale fishers in these two countries usually do not typically own any of the processing resources. Instead, they sell to a middle man who process elsewhere. The funding scheme proposed seems to assume that these processing plants, usually owned by larger companies, pass along the extra profits they get from producing and selling a product from functional fisheries handling or processing equipment. If this assumption is not true, how will this model be modified and made sustainable after GEF financing runs out?
- Explain how the selected indicators (e.g. coral reef ecosystem under community rights based management and VPUE) indicate that fisheries management is effective. VPUE, for instance, could increase (what they want) if the resource becomes so scarce that what is left now is suddenly valuable.
- Improve explanation of how a dialogue will be started and maintained with communities that use an area jointly. The high number of constituents claimed to be reached by the RARE campaign needs to be clearly explained.

- Describe the governance scheme that will support this plan. Before any of these TURFS and other measures are implemented, a strong governance regime is needed. Tools that are used without a governance scheme are limited in their impact and success.
- Better explain how the requirement that loan recipients can only buy from TURFs will be effective. Rationale: (1) Our understanding is that not all species of fish are traded outside of the local or regional area. And that the common way to sell a fish is whole, not processed. Thus, not all trade needs to be processed by new equipment, if by any equipment at all; (2) Internationally traded species like blue swimming crab are sources from hundreds of different communities, many not part of this proposed project; (3) Sustainability certifications are not yet implemented in many cases – it is catch documentation that is being implemented and a lot of fish is caught legally. Often sustainability is not part of the discussion.
- Consider synergies with other ongoing investments, including USAID’s work with RARE and Bloomberg through a Global Development Alliance.
- The United States is supportive of the Non-Grant Instrument Pilot (NGI) and expects this NGI concept will have additional financial details as it is converted from a concept into a full project proposal.